

CODE OF CONDUCT

2026



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MESSAGE FROM THE CHIEF EXECUTIVE OFFICER



Dear colleagues,
Present in more than 28 countries, we operate in increasingly complex and demanding environments. In this context, our values are more than ever the foundations on which we rely to conduct our operations and achieve our collective ambition: *Driving a new generation of mobility*, which sets the Group on a path of responsible growth for the future generations to come. It is therefore crucial for us to maintain the highest levels of ethics and compliance in all our activities, wherever we are.

**ETHICS IS NOT
JUST A MATTER OF
RESPECTING THE
LAW. IT IS ABOVE
ALL A MATTER
OF VALUES.**

Ethics is not just a matter of respecting the law. It is above all a matter of values. Our values are the roots of our responsible business model, whether it is respecting laws and human rights, rejecting any form of corruption, or exemplary management of our resources and environmental impacts.

Each and every one of you has the responsibility to know this new Code of Conduct, to put it into practice daily, and to be its ambassador to all those who work with and for us.

The Group has implemented a whistleblowing procedure to freely and safely report any violation, to ensure a safe and ethical framework for all our operations.

The Executive Committee and I are counting on your personal and collective commitment to make our values and actions a source of exemplary performance.

Félicie Burelle
Chief Executive Officer
OPmobility SE

**"We feel responsible for
future generations"**

**"We engage
with passion"**

OUR VALUES

**"We trust
each other"**

**"We dream big
and deliver"**

**"We take risks
to open new ways"**

WHAT IS THE PURPOSE OF THIS CODE?

This Code is intended to help you to understand and apply the ethical values that fundamentally bind us together at OPmobility, and which apply to all our businesses, wherever we have a presence.

It defines the nature of the relationships that we wish to have within the Group to ensure good relations, both internally and with all our stakeholders including our customers, suppliers, other partners, administrative bodies, shareholders and the financial community.

It sets out OPmobility's commitments and your commitments in terms of ethics, which must guide us in our day-to-day activities.

Each item of the Code appears as follows:

1 – The principle

An explanation of the ethical standard that everyone must observe and see applied.

2 – The rules of conduct

A summary of the rules of conduct that must guide your actions and those of OPmobility to ensure compliance with the principles of conduct in our day-to-day activities.

Some of the rules of conduct set out in this Code are further detailed in specific codes/standards as follows:

- The IT charter setting out the rules for using the IT and digital resources at your disposal;
- The charter for the prevention of insider dealing;
- The competition law compliance code;
- The OPUS rules.

All these codes/standards can be accessed on our intranet. You must familiarise yourself with them and apply the rules that they contain.
The Code of Conduct is available on [opmobility.com](https://www.opmobility.com)

TO WHOM DOES THIS CODE APPLY?

This Code applies to OPmobility SE and to all companies controlled by the Group ("the Group" or "OPmobility").

It applies in all countries where OPmobility has a presence. We must therefore not only always respect the regulations, cultures and environment of those countries, but also apply the principles set out in this Code when we are there.

It applies to everyone: senior executives, team managers and employees.

I have responsibilities as a senior executive/team manager. Do I have additional responsibilities?

Yes, you must set an example, ensure that those for whom you are responsible have the resources and the knowledge to comply with the Code, and assist any employees who, in good faith, ask questions about the Code.

In return, every employee must, by their behaviour, demonstrate a personal and constant commitment to comply with the law and with the ethical rules set out in the Code.

WHY COMPLY WITH THIS CODE?

OPmobility is determined to conduct its business at all times and in all places in compliance with the law and with ethical rules, which implies strict compliance with the rules set out in this Code.

We must show our customers the high level of ethics to which OPmobility has always adhered. We must also make sure that our partners and suppliers apply the same ethical standards as ours.

Failure to comply with the rules contained in this Code could have serious consequences, not only for OPmobility and all its employees but also for the individuals involved. In particular, it can result in potential fines, imprisonment and damages as well as compromise the reputation of the parties involved. It could also affect OPmobility business (in its relations with its customers, for example through its exclusion from contracts).



OPmobility takes the violations of its Code of Conduct and of related policies and procedures very seriously. Any breach may result in disciplinary measures, up to dismissal in compliance with applicable provisions, as well as legal proceedings brought against the offender.

LET'S TALK IT OVER

There's no such thing as an irrelevant question.

If you have any doubts, ask yourself the following questions before making a decision:

- Am I complying with the Code of Conduct and OPmobility's internal policies?
- Is it the right thing to do?
- Does my behaviour put OPmobility at risk?
- Am I approving something unusual?
- Would I like my decision or my actions to be reported in the press?

Your contacts

You may have concerns about certain practices and need help or advice to resolve them.

You may also have a question about this Code, or be put in a situation, or be aware of a situation, that appears to you contrary to the rules contained in this Code or be faced with a situation that is not covered by this Code.

The normal procedure for raising such concerns is to contact your immediate superior.

However, a dedicated procedure is also available to you in the event that:

- you think that informing your immediate superior could cause difficulties;

- the irregularity in question relates to bribery and corruption, fraud, anti-competitive practices, discrimination, harassment in the workplace, health, hygiene, safety at work, product quality/ safety or protection of the environment.

You can submit an alert by telephone or web through our EthicsPoint platform using the contact details below. This independent service is available 24/7.

opmobility.ethicspoint.com

For more information, please consult the Whistleblowing procedure

[Whistleblowing procedure](#)

Employees who, in good faith and without ulterior motives, use these methods to warn of the existence of situations in conflict with the Group's ethics and Code of Conduct of which they are personally aware of will benefit from the protection of whistleblowers and will not be subject to any sanction or retaliation. They must however rely on information formulated in an objective manner and attach to the form any document or information likely to prove the alleged facts.

- #1 To observe human rights
- #2 To observe freedom of expression and employer/employee dialogue
- #3 To guarantee employees' health and safety
- #4 To promote the diversity of staff
- #5 To prohibit and prevent any form of harassment
- #6 To prevent bribery and corruption and influence peddling
- #7 To respect the environment

OPMOBILITY'S COMMITMENTS

COMMITMENT #1

To observe human rights

THE PRINCIPLE ▾

OPmobility undertakes to observe and promote human rights, in accordance with the United Nations Global Compact, in every country in which it is established.

OPmobility will ensure that, wherever they may be located, its employees are offered and guaranteed safe and healthy working conditions and observance of fundamental freedoms.



The rules of conduct

Thus, OPmobility guarantees:

- that its employees have freely chosen their job and that they are free to leave on the terms set out in their employment contract, which specifies the essential elements of their employment (salary, working hours, etc.);
- that no child is employed by the Group. In accordance with the standards of the International Labour Organisation (ILO), and without prejudice to more protective local provisions, OPmobility undertakes not to hire any person of less than 15 years of age for work of any kind, or any person of less than 18 years of age for work involving specific risks (for example, the handling of hazardous products).

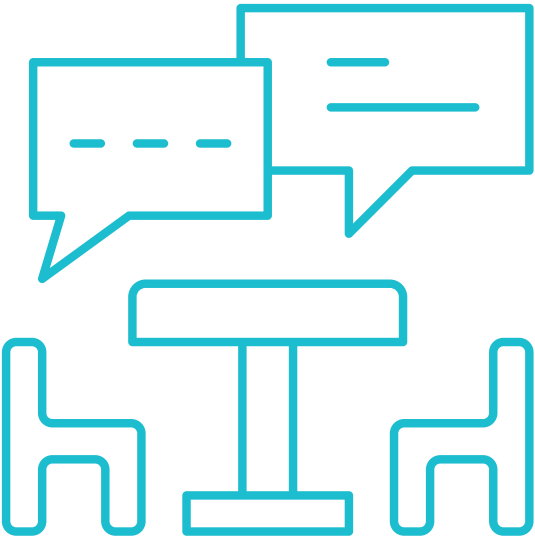
COMMITMENT #2

To observe freedom of expression and employer/employee dialogue

THE PRINCIPLE ▾

OPmobility respects everyone's convictions and recognizes its employees' right to freedom of expression.

OPmobility undertakes to develop employer/employee dialogue and encourages its employees to express themselves freely in order to improve their working environment while acting in accordance with the rules contained in the Code.



The rules of conduct

- OPmobility undertakes not to interfere politically or religiously (by way of adoption of a position, intervention or support), in any of the countries in which it is established, in favour of a political party, religious community or any other political or religious organization.
- OPmobility recognizes its employees' right to form the union organizations of their choice and/or to organize staff representation, within the framework of the regulations.
- OPmobility undertakes to keep its employees or their representatives informed in good time about its activities, and to comply with its obligations in each country to inform and consult its employees.

COMMITMENT #3

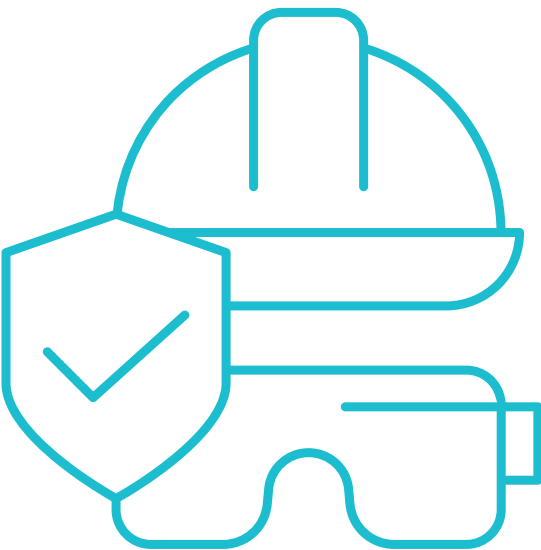
To guarantee employees' health and safety

THE PRINCIPLE ▾

OPmobility undertakes to put a working environment in place which protects its employees' physical and mental health and safety.

This is an absolute priority for the Group, and everyone must make it their business.

The Group's ambition is to strive for zero accident.



The rules of conduct

OPmobility has set up a health and safety management program reflecting the Group's intention to continue to improve both the physical and mental safety of its employees, so that the working environment is kept safe and free of danger.

Thus:

- OPmobility undertakes to make its directors and team managers responsible for safety issues, to increase their vigilance and involvement (with training courses in safety management in all countries where the Group is established).
- OPmobility will ensure the conformity of equipment (with audits of machinery and equipment and rectification of non-conformities identified) and the quality of working conditions.
- OPmobility encourages its employees to propose any improvements both of procedures and of machinery and equipment.
- OPmobility encourages its employees to implement solutions that improve their quality of life at work.

COMMITMENT #4

To promote the diversity of staff

THE PRINCIPLE ▾

OPmobility's employees are its greatest strength. OPmobility's policy is to recruit, train and promote its staff, in all positions, according to their individual abilities and aptitudes.

OPmobility strives to promote the diversity of its staff, which is a great advantage for a global business with local roots.

Through equality of opportunity, OPmobility hopes to increase the number of women on its staff and develop their careers both in technical and managerial positions.



The rules of conduct

OPmobility undertakes not to discriminate in any way particularly on the grounds of gender, skin colour, age, origin, sexual orientation, religion, political opinions, union activity, pregnancy, family situation or disability.

This rule applies in all situations:

- at the recruitment stage, as regards a candidate, in the context of a recruitment process or an application for an internship;
- at the career development stage, as regards an employee, in the context of the performance of the contract (remuneration, promotion, transfer, training application, etc.) or with regard to the continuation of careers at OPmobility (dismissal, contract renewal).

COMMITMENT #5

To prohibit and prevent any form of harassment

THE PRINCIPLE ▾

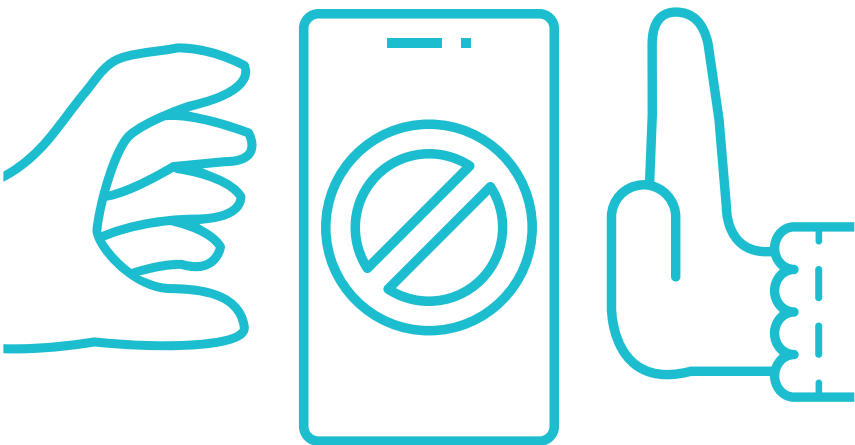
OPmobility undertakes to maintain a professional environment in which employees are treated with respect and are not exposed to any psychological or sexual harassment.

OPmobility does not tolerate any form of violence, which characterises harassment regardless of its nature. Every employee has the right to work in an environment free of any form of harassment that undermines his or her dignity and physical or psychological integrity.

The rules of conduct

OPmobility prohibits:

- any form of psychological harassment: any inappropriate behavior such as shaming, intimidation, or vexatious comments and conduct, intended to hurt colleagues and employees;
- any form of sexual harassment: any inappropriate behavior towards colleagues and employees, such as improper comments, inappropriate conduct, physical touching, solicitation or improper invitations.



COMMITMENT #6

To prevent bribery, corruption and influence peddling

This Chapter of the Code of Conduct and the policies it refers to constitute OPmobility's anti-bribery code of conduct as required by Article 17 of French Law No. 2016-1691 of 9 December 2016, on transparency, the fight against corruption, and the modernization of economic life, and applicable to all Group entities in the world.

THE PRINCIPLE ▾

OPmobility rejects bribery and corruption and influence peddling in any form, including through intermediaries: such conduct is unacceptable and is subject to zero tolerance. The prevention of bribery and corruption is one of the commitments given by OPmobility in the context of the United Nations Global Compact.

Bribery is an illegal arrangement between two or more people, the purpose of which, for the person making the bribe, is to obtain benefits or special treatment, and, for the person receiving the bribe, is to obtain payment or any form of advantage in exchange for his favours.

There are two sides to bribery and corruption:

- Active bribery involves offering or giving something, whether directly or indirectly, in order to secure an improper advantage;
- Passive bribery involves soliciting or accepting something, whether directly or indirectly, in exchange for the giving of an improper advantage.

Influence peddling, which is an offence similar to bribery and corruption, involves:

- proposing, offering or giving any improper advantage, whether directly or indirectly, by way of a fee, to any person asserting or confirming its ability to exert influence over the decisions of a national or international public official, whether that improper advantage is for that person or for someone else;
- the solicitation, receipt or acceptance of the offer or promise by way of a fee for such influence, whether or not the influence is applied or whether or not the supposed influence produces the desired result.





Keep in mind that the mere attempt to bribe or to rely on influence peddling is sufficient to characterize a corrupt act.

OPmobility requires its employees to act honestly and with integrity in all circumstances, wherever they may be, and this implies strict observance of the laws in force with regard to the prevention of bribery, corruption and influence peddling in all countries in which OPmobility may operate. Employees and representative must therefore comply with the OPmobility rules of conduct in order to protect themselves and the company against risks of involvement in a bribery or corruption scheme.

The rules of conduct

#1 SEEK ADVICE

- If you have any doubt on how to behave seek advice from a member of the Compliance Network.

Compliance Network and policies

- Any situation that could lead to confusion must be avoided.
- Communication is key. Don't try to resolve an unambiguous situation on your own.

#2 GIVING OR RECEIVING GIFTS OR INVITATIONS

- ⊗ OPmobility prohibits the offering or giving of gifts or invitations to the executives, representatives, intermediaries or employees of a customer, supplier, or organization, which are or might reasonably be regarded as likely to influence the business relationship between OPmobility and that customer, supplier, or organization.

The only exceptions relate to gifts and invitations of low value, when they are usually offered in a completely transparent way to third parties having similar relationships with OPmobility, and which are not prohibited by law, custom or the rules of the company concerned. Gifts of money are always prohibited.

- ⊗ Conversely, OPmobility prohibits employees from receiving, gifts or invitations from its suppliers or customers, whether for themselves or for members of their family, unless such gifts or invitations are of low value.

- ✓ In any event, such gifts and invitations must be the exception.
- ✓ They must not have any connection with the taking of important decisions (for example, the award of a contract). In effect, the circumstances of the gift or invitation must not be such as to give rise to suspicions of bribery or corruption, even after the event. Care must therefore be taken with regard to the context and meaning that an advantage or gift might have, and nothing must be expected in return.

For more information, please refer OPmobility's Gifts and Invitations Policy

Compliance policies

#3 GIVING OR RECEIVING MONEY IS ALWAYS PROHIBITED

- ⊗ OPmobility prohibits employees and representatives from receiving or giving money, including gift cards.
- ⊗ There are no exceptions to this rule.

#4 PROHIBITION OF FACILITATION PAYMENTS

- Facilitation payments are made by a business to a government official in order to encourage or ensure that the official performs his or her normal duties.
- Such payments are generally small and made with the intention of expediting an administrative process or smoothing it.
- In accordance with the majority of anti-corruption laws OPmobility prohibits this type of payment.

#5 RELATIONS WITH PUBLIC OFFICIALS

Public officials refer to persons acting on behalf of the public authority, entrusted with a public service mission, or invested with a public elective mandate.

- ⊗ OPmobility prohibits any payments of money, or the giving of gifts or invitations, to public officials, in order to influence their actions and decisions, and particularly in order to secure or retain a contract.
- ⊗ OPmobility prohibits employees from mentioning or offering the possibility of employment, or of any financial or commercial advantage, to public officials.

#6 RELATIONS WITH INTERMEDIARIES

Intermediaries refer to, but is not limited to, business introducers, representatives, agents, negotiators, advisers and consultants.

- ✓ Regardless of the situation, any decision of an employee of OPmobility to use the services of an intermediary must be justified and documented and be the subject of prior approval by management.
- ✓ Any use of an intermediary must also be carefully reviewed and screened in advance so that only honest and bona fide intermediaries are hired. .
- ✓ Any action by an intermediary must be taken in the context of an agreement that clearly states the services to be provided and the fees for, and other terms and conditions of, those services. Intermediaries' fees must be transparent and precisely correspond to the services actually provided..

For more information, please refer OPmobility's Intermediaries Policy

Compliance policies

#7 SUPPLIERS AND INDUSTRIAL AND COMMERCIAL PARTNERS

- OPmobility ensures that its suppliers and industrial and commercial partners comply with rules that are at least the equivalent of those contained in this Code with regard to the prevention of bribery and corruption.
- OPmobility also requires contracts with its suppliers and industrial and commercial partners to contain clauses relating to their obligations concerning the prevention of bribery and corruption.





#8 SPONSORSHIP AND DONATIONS

- ✓ When making financial contributions to cultural, charitable or sporting activities, OPmobility requires strict compliance with applicable laws and internal policies.
- Such contributions must be legitimate, properly documented, subject to prior due diligence on the beneficiary, and approved in accordance with the Group’s governance rules. Payments may only be made once all required controls and formalities have been completed.

#9 FINANCING OF POLITICAL ACTIVITIES

- ✗ OPmobility prohibits any direct or indirect contribution, whether financial or in kind, by the Group or on its behalf to political organizations, parties or personalities.
- The financing of political activities could be used to conceal an improper advantage intended to obtain or maintain a commercial transaction or relationship. In other words, the financing of political activities could be regarded or interpreted as direct or indirect bribery or corruption.

#10 LOBBYING

Lobbying refers to any private initiative aimed at influencing or changing a public decision, in

favour of a particular cause or towards a desired result.

- ✗ OPmobility prohibits its employees from seeking to obtain an improper political or regulatory advantage by means of the Group’s lobbying activities.

Compliance policies

#11 CONFLICTS OF INTEREST

- A conflict of interest refers to any situation of interference between interests likely to influence a decision.
- If the existence of a conflict of interests does not necessarily lead to corruption or bribery, it does put OPmobility at risk.
- In the existence of a conflict of interests, employees and representatives must withdraw from the problematic situation.

For more information, please refer OPmobility’s Conflict of interest Policy:

Compliance policies

#12 RAISING ALERTS

In the event that a breach is detected in the rules mentioned above, do raise the issue either with your manager or by reporting it through our EthicsPoint platform using the contact details below. This independent service is available 24/7.

Raising alerts

QUESTIONS & ANSWERS

#1 I urgently need a supply that was imported and is still blocked by local customs. Our customs broker indicates that it can speed up the customs process if I pay him EUR 100 so he can pay the desk officer at the customs office. Can I do this?

Unless the EUR 100 fee is provided by law in the context of a “fast track” procedure, such payment would be considered as a facilitation payment which is prohibited by OPmobility. If the fee is not required by law or if the agent refuses to provide an official receipt for the payment, explain that OPmobility refuses this type of arrangement, regardless of the amount of payment required, and that you will inform your superiors of the risk of delay. Be sure to report the situation to your manager or a member of the Compliance Network.

#2 I intend to submit a proposal for a tender to a customer. An old friend of mine works in the Purchasing sourcing committee of the customer. I invite him to a lavish meal in a Michelin star restaurant to discuss how in practice the specifications could be written so that only our company can win the tender. Can I do this?

Such invitation would not comply with the OPmobility’s Gifts and Invitations Policy and is prohibited. Not only is the value of the invitation excessive, but the fact that it occurs in the middle of a tender and aims at amending the specifications exposes OPmobility to potential allegations of bribery

since it could be considered as an improper advantage provided in an attempt to win the tender.

#3 In the context of a new JV partnership, I am in charge of opening a new plant in a governmental industrial park. The JV partner directs me to a company to support in the submission of the administrative file. This company requests undocumented payments in excess of the costs of the administrative services they will perform. What should I do?

Reach out to your immediate superior within OPmobility or a member of the Compliance Network in order to seek guidance. Such payment may qualify as a facilitation payment, which is prohibited by OPmobility. You should also try to understand why the JV partner directed you to this company since there may be a risk of collusion. This situation may trigger further investigations on the JV partner to ensure its integrity.

#4 As the legal representative of a local subsidiary, I’ve been invited to a ceremony rewarding the Company’s investment in innovative technologies. A new law is currently being discussed to regulate the automotive sector. A Senator is present at this ceremony. Should I invite him to dinner to convince him to introduce new amendments in favour of the industry? →



If nothing stops you from talking to the Senator at the ceremony and try to explain the economic consequences of this bill, you shall not, invite him to dinner. This would be considered as an advantage provided in the attempt to influence a member of parliament. Whenever you consider offering or receiving a gift or other hospitality involving a third party, consult the OPmobility's Gifts and Invitations Policy to make sure you apply its rules.

#5 The relationship with a customer to which OPmobility provides a key component, has been particularly strained lately (quality claims, late deliveries...). The customer's contact person suggests that the relation may be smoother if OPmobility sponsors the sport's club of which he is president. Should I accept?

Sponsorships should never be used as a means to influence business relationships. Under no circumstances should you agree to this proposal in exchange for a smoother commercial relationship. This would be considered as bribery. In any event, sponsoring requires prior consent of the General Management of each Business Group.

#6 I would like to obtain public funding for the development of a hydrogen project in Hong-Kong. A public official contacts me and proposes to accelerate the administrative process, in exchange of USD 1,000. What should I do?

You must first ask whether payment is required by national legislation and whether it is possible to obtain an official receipt from the government for the USD 1000 paid. If the fee is not required by law or if the agent refuses to provide an official receipt for the payment, explain that OPmobility refuses this type of arrangement, regardless of the amount of payment required, and that you will inform your superiors of the risk of delay. Be sure to report the situation to your manager or a member of the Compliance Network

#7 A friend of mine works for an organization that specializes in certifying the quality of products related to my field. He offers to introduce me to his colleagues during a forum so that I can make some useful business contacts. What should I do?

Be extremely cautious, as your friend may illegally abuse of his influence over his colleagues from the organization. To protect yourself and OPmobility, seek advice from a member of the Compliance Network who will help you to determine how to handle this relationship and the potential conflicts of interests or influence peddling.

COMMITMENT #7

To respect the environment

THE PRINCIPLE ▾

In all countries in which it is established, OPmobility follows an active policy to protect the environment, in accordance with the United Nations Global Compact.

This not only involves complying with the legal provisions in force in the countries in which OPmobility operates, but also, where such provisions do not exist or are regarded as inadequate, drawing up and implementing OPmobility's own rules and ensuring that they are implemented and applied, with the aim of constantly improving its environmental management system (EMS).

OPmobility strives to control the environmental footprint of its activities and products. In particular, actions are taken to limit the use of raw materials, to optimise natural resources, to use renewable energies, to favour clean energy suppliers in order to reduce emissions of pollutants, to reduce waste production at every stage of the manufacturing process and to encourage recycling.

The rules of conduct

- OPmobility adopts a precautionary approach to problems affecting the environment, particularly by auditing the environmental risks associated with its activities.
- OPmobility takes responsibility initiatives with regard to the environment, by developing programs and practices that are favorable to the environment in each of its businesses. OPmobility also applies "green" solutions in its environmentally friendly approach to the mobility industry.
- OPmobility develops and promotes technologies that respect the environment in the context of its industrial process.



YOUR COMMITMENTS

- #1 To protect OPmobility's assets
- #2 To guarantee product quality and safety
- #3 To protect business secrets
- #4 To protect OPmobility's image
- #5 To prevent conflicts of interest
- #6 To comply with competition law
- #7 To comply with the regulations on insider dealing

COMMITMENT #1

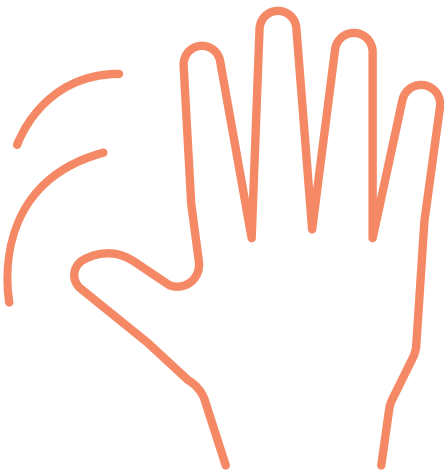
To protect OPmobility's assets

THE PRINCIPLE ▾

In the context of their activities, OPmobility's employees have the use of assets belonging to the Group, which must be used only in its interests.

These include OPmobility's tangible assets (stocks, computers, mobile telephones, photocopiers, books, buildings, vehicles, etc.) and its intangible assets (licences, software codes, information relating to intellectual and industrial property, etc.).

Every employee is responsible for protecting these assets and using them properly.



The rules of conduct

- OPmobility's assets are intended to be used for business purposes:
- You must not use them for personal purposes. They must be used in accordance with the interests of the Group and in compliance with applicable regulations.
 - You must only use communication systems (internet access, e-mail, telephone, etc.) in the context of your business activity at OPmobility. However, the use of communication systems for personal purposes may be authorised provided it is reasonable and does not interfere with your business activity.
 - You must not use OPmobility assets for any fraudulent purpose, and you must take any necessary steps to prevent the misuse or theft of those assets.
 - You must take any necessary steps to prevent damage to the Group's assets. In particular, you must not install any software on your computer without having been explicitly authorized to do so

COMMITMENT #2

To guarantee product quality and safety

THE PRINCIPLE ▾

The safety and quality of products have always been of capital importance to OPmobility.

In order to meet its exacting requirements, OPmobility applies very strict design, production and quality standards and ensures that its products comply with all the legal, regulatory, technical and commercial requirements in force.

Regardless of your function within the Group, you must strive to achieve these standards at all times.



The rules of conduct

- You must comply with all the laws and regulations to guarantee the conformity of all OPmobility products.
- You must ensure that health, safety and quality control standards are implemented at every stage, from the design of products to their production and distribution.
- If any signs or indications of a potential problem appear regarding the safety or quality of our products or of our manufacturing processes, you must respond immediately and alert your line manager.

COMMITMENT #3

To protect business secrets

THE PRINCIPLE ▾

Historically, innovation has been the driver of OPmobility's success. It is our trademark and it reflects the Group's pioneer spirit.

Disclosure of our secrets, and more broadly, unauthorised disclosure of information obtained in the context of your business activity, could cause OPmobility serious harm.

You must always treat information that you obtain within OPmobility, and which has not been made public, as confidential.



The rules of conduct

- You must ensure that when preparing documents containing confidential information, they are marked "Confidential".
- You must not discuss confidential information, particularly on social media, or read confidential documents in public places, or throw them away in places where they could be recovered by third parties; similarly, you must not leave confidential documents behind, particularly when leaving a conference room.
- You must not disclose documents produced or obtained in a work context, or photographs and videos taken in your workplace, which might reveal OPmobility's activities.

COMMITMENT #4

To protect OPmobility's image

THE PRINCIPLE ▾

Our image is our most precious asset. It depends upon the behavior of every one of you.

You must act at all times with its protection in mind, avoiding any communication that might undermine it, particularly on social media.



The rules of conduct

- Only the representatives designated by General Management can make public statements on behalf of OPmobility.
- You must not create any account in OPmobility's name, or use its logo or share information in its name, on social media.
- When you take part in conversations in the context of your external activities, and particularly in online conversations, which might directly or indirectly involve OPmobility, you must mention that you are speaking personally and not for and on behalf of OPmobility.
- You must not use your business e-mail address on forums or on non-professional mailing lists.
- You must not send messages of a racist, obscene, defamatory, or simply offensive or humiliating nature, from your business e-mail address. You must not publish content that denigrates OPmobility, or relay messages of that kind to your contacts.

COMMITMENT #5

To prevent conflicts of interest

THE PRINCIPLE ▾

A conflict of interest refers to any situation of interference between interests likely to influence a decision.

The existence of conflicts of interest could harm OPmobility, not only due to its own interests being supplanted by personal ones, but also because its reputation and that of all its employees would be damaged. In your business activity, you must therefore act at all times only in OPmobility's interests. If such situation does not necessarily lead to corruption or bribery, it does put OPmobility at risk.

For more information, please refer OPmobility's Conflict of interest Policy:

Compliance Network and policies



The rules of conduct

- You must refrain from promoting any personal, financial or family interest that might prevent you from acting in the best interests of OPmobility. You shall neither put your personal interests ahead of those of the Group nor prioritize your personal relations with customers, suppliers, service providers or any other persons belonging to companies or public or private organizations in which OPmobility has equity interests.
- You must not be involved directly or indirectly in the conclusion of any business with any member of your family, or with a person or business with which you or your family are associated. In any case, you shall not ask your relatives to prioritize the Group's interests, to the detriment of the organization to which they belong.
- You must not accept any role in a business involved in an activity that is similar to that of OPmobility.
- With the exception of the shares of listed companies, you must not acquire a stake in the company of a competitor, supplier or customer, whether directly or through relatives, friends or intermediaries.
- When you are in a situation in which you employ a member of your family, you must ensure that this does not give rise to a conflict of interest.

COMMITMENT #6

To comply with competition law

THE PRINCIPLE ▾

The purpose of competition law is to set the rules governing the economic interplay between companies on the market, in order to ensure that companies compete with each other fairly and on merit.

Thus, competition law requires that no agreement, understanding or more generally conduct should take place that one way or another prevents fair competition, particularly on the part of a company in a position of strength on a given market or as regards a customer or supplier.

OPmobility's intention is to comply strictly with the rules of competition law, since its competitive advantages must result from its own performance and not from unfair practices.

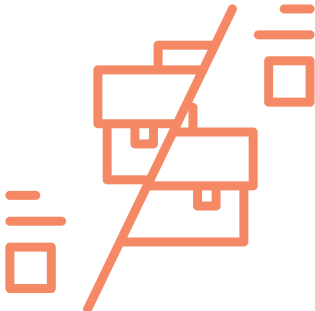
You must therefore comply with these regulations and apply the applicable competition rules set out in the Code of compliance with competition law.

For more information, please refer OPmobility's Competition Law Conduct Code:

Competition Law Conduct Code

The rules of conduct

- You must always determine your commercial policy based on the market and act in a totally independent and autonomous way without communicating or consulting with your partners and competitors.
- You must ensure that any exchange of information, discussions or other communications that you might have with competitors, whether directly or indirectly, for example in the context of business associations, will not be able to be interpreted in any circumstances as constituting prohibited agreements or understandings.
- If OPmobility is in a position of strength on a given market or as regards a customer or supplier, you must observe certain precautions in order not to abuse that position by attempting to exclude competitors, impose prices on resellers, or boycott certain customers, for example.



COMMITMENT #7

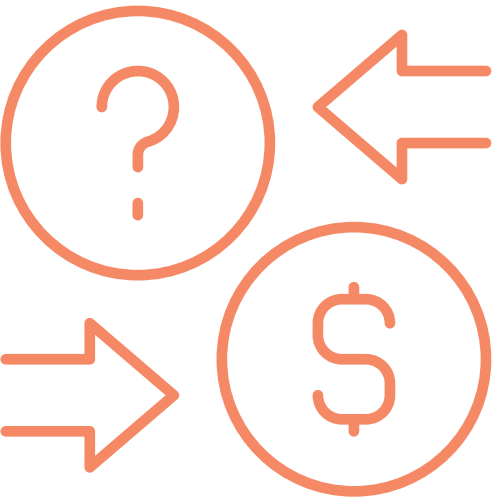
To comply with the regulations on insider dealing

THE PRINCIPLE ↘

OPmobility is a company listed on the stock exchange and is subject to the regulations governing negotiable securities in force in France. You must therefore comply with those regulations and with the applicable insider dealing rules set out in the Charter for the prevention of insider dealing.

For more information, please refer OPmobility's Charter for the Prevention of Insider Dealing:

Prevention of Insider Dealing



The rules of conduct

- When you are in possession of inside information concerning OPmobility, you must not carry out transactions (and particularly purchases or sales) in OPmobility shares, or arrange such transactions or recommend to third parties to carry out such transactions, for as long as that information has not been made public.

"Inside information" is any precise and tangible information concerning the situation of the Group that could have a positive or negative impact on the price of OPmobility or Burelle SA shares, the content of which has not yet been made public by way of a press release.

If you act in breach of this rule, you will be liable to the criminal penalties provided for in respect of insider dealing and to the administrative penalties imposed by the French Financial Markets Authority (AMF).

- Furthermore, if you are in possession of inside information concerning OPmobility, you must not disclose it to a third party until it has been made public, in most cases by way of a press release.

If you act in breach of this rule, you will be liable to the criminal penalties provided for in respect of insider dealing and to the same administrative penalties as the person using the information.

INFORMATIONS & PROCEDURES

Informations

[Compliance Network and policies](#)

[Compliance policies](#)

Whistleblowing procedure

You can send an alert by telephone or online via our EthicsPoint platform using the contact details below. This independent service is available 24/7.

opmobility.ethicspoint.com

For more information, you can consult the Whistleblowing procedure

[Whistleblowing procedure](#)