


Oleon Code of Ethics Guide



A natural chemistry is the core of our business, which is reflected not only in our products based on natural renewable raw materials, but also the chemistry we have with our employees, customers, suppliers and stakeholders.

Each one of us shapes our culture through our words and actions. Making good decisions and ethical choices in our work builds trust in each other and with our customers and partners.

Our Code of Ethics sets out our longstanding commitment to our stakeholders and the standards of behavior to which all of us at Oleon must adhere. The Executive Committee and I are committed to ensuring that these standards are met throughout our operations.

I urge you to familiarize yourself with the Code of Ethics and use it as your daily guide. In a world that is increasingly complex, we all must remain vigilant that our words and actions reflect the right behavior.



Moussa Naciri,
CEO Oleon

The AVRIL Group

The AVRIL Group was born of a collective approach. It was set up in 1983 at the initiative of farmers in order to develop the French production of oilseeds and protein crops. By federating all actors in these sectors and developing markets for their production, in a little more than 35 years AVRIL has become a major industrial and financial group.

Today it is present in France and internationally in sectors that are as diversified as they are intimately linked: human foods, animal nutrition and expertise and renewable energies and chemistry. In each of these sectors, growth has been based on a portfolio of brands that are leaders in their markets, such as Diester®, Sanders, Lesieur, Puget, Matines, Bunica, Taous, El Kef, Radia®, Jolee® etc.

The AVRIL Group has established a Code of Ethics and Good Practice which presents the standards that all employees of the AVRIL group are required to uphold in their daily activities and relations with other people. The suppliers and partners of AVRIL are also required to comply with the provisions of this Code in their dealings with any company of the Group.

The AVRIL Code of Ethics and Good Practice is the foundation of the Oleon Code of Ethics Guide. The standards presented in the AVRIL Code of Ethics and Good Practice are applicable to all employees of the AVRIL Group.

The AVRIL Code of Ethics and Good Practice can be found on:
www.groupeavril.com/en/sustainable-development

Avril GROUP

Applicable laws

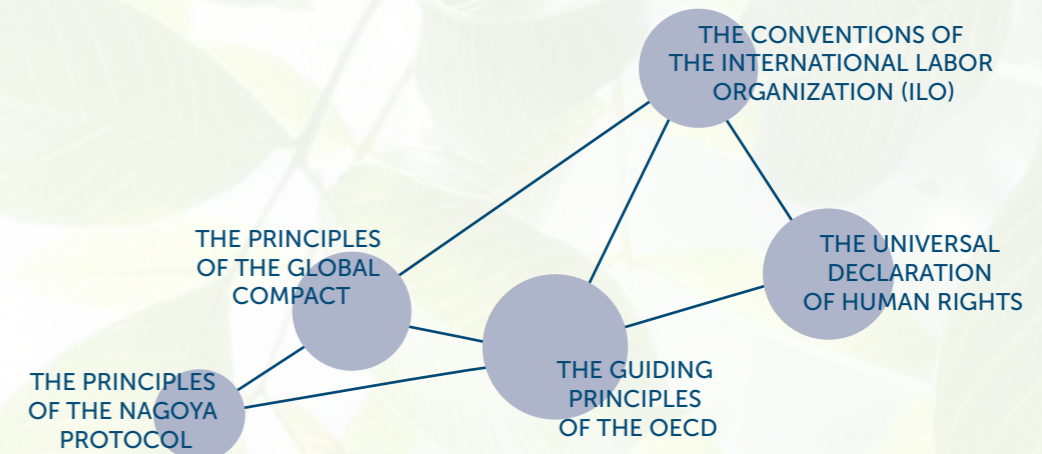
Oleon has business activities in many countries all over the world and must therefore comply with the laws applicable in these different territories. Oleon and its employees must comply with the regulations of each country where its respective company carries out its activities.

The General Management of Oleon must take every necessary action to prevent Oleon and its employees from deliberately or inadvertently taking actions that are, or appear to be, in breach of the applicable laws, by-laws and regulations.

The responsibility to monitor compliance with laws and regulations must be clearly assigned to competent and duly identified persons. Appropriate procedures for internal supervision and control must be established.

Pledges of Oleon and the AVRIL Group

Oleon and the AVRIL Group have pledged to exercise its activities in conformity with the applicable international or national regulations and with the principles specified in international standards, in particular:



WE SUPPORT



In 2017, the AVRIL Group signed the United Nations Global Compact, which is the most important initiative in the world in the field of corporate social responsibility and sustainable development. As a signatory, the AVRIL Group has pledged to promote, through its strategies and activities, the Ten Principles of the UN Global Compact, concerning human rights, labor standards, the environment and anti-corruption.

More information can be found on: www.unglobalcompact.org



Additionally, Oleon and the AVRIL Group have developed specific policies on [palm oil](#), [biodiversity](#), [modern slavery](#) and IT. Together, Oleon and the AVRIL Group have also established a [Supplier Code of Conduct](#) to communicate our values to our supplying partners.

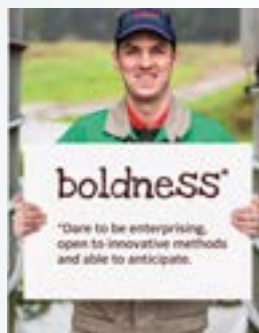
Our Values

To mark its birth, AVRIL chose three values: **RESPECT**, **BOLDNESS** and **PERFORMANCE**. Today, these values form the foundation of our business.



RESPECT

Respect is the core of our identity. It means having esteem for our colleagues, partners, customers and suppliers. Respect naturally implies the values of fairness and solidarity.



BOLDNESS

Boldness is part of our story. Without daring, our success would be impossible. To dare to undertake, whatever one's position, to dare to open up to innovative approaches, to be able to anticipate are keys to answer the challenges of our transformation.



PERFORMANCE

Continual improvement and the quest for excellence are ideals that we have pledged to cultivate. Performance is already central to our life. Performance is simultaneously economic, corporate, social and societal. The aim is for all of us to team together to be a customer and result-oriented company in full respect of our values.

Our responsibilities



Health and safety

Commitment to health and safety at work is a fundamental social responsibility for Oleon. Oleon complies with all the laws and regulations in force. Oleon establishes the standards, procedures, emergency action plans and management systems necessary for the exercise of our activities.



Forced and compulsory labor

Oleon undertakes not to use forced or compulsory labor as defined in the ILO Conventions.



Child labor

Oleon undertakes to apply the requirements related to eliminating child labor and the protection of children and adolescents as defined by the ILO Conventions.



Harassment

Oleon protects its employees against all forms of harassment, intimidation and victimization, whether sexual, physical or psychological.



Discrimination

Oleon undertakes not to make any distinction, exclusion or preference made on the base of race, color, sex, religion, political opinion, national extraction or social origin, as defined by the ILO Conventions.



Wages and working hours

Oleon undertakes to comply with the applicable local legislation concerning the minimum wage and undertakes to pay regular wages and salaries to its employees. Oleon undertakes to pay overtime in conformity with the rates defined by the applicable local laws.



Human rights

Oleon supports and respects the protection of internationally declared Human Rights. Oleon will treat all individuals with dignity and respect.



Undeclared labor

Oleon undertakes not to use undeclared labor and to comply with its obligations concerning declaration to the administrative, social and tax authorities, as stipulated in the rules of the countries where Oleon's subsidiaries operate. Oleon also ensures that all its employees are granted adequate rest periods.



Right of association

Oleon undertakes to comply with the principles of freedom of association, protection of trade union rights and collective bargaining as laid down in ILO Conventions, in conformity with local legislation. Oleon ensures that its employees can express themselves freely.



Career management

Oleon strives to attract, retain, inspire and develop employees whose talents and aspirations are in line with the company's needs and future goals.

Code of Ethics – Working environment



Health and safety

The AVRIL Group has developed a safety culture that involves all its employees and suppliers: the Group has the aim, at all of its sites, to bring the accident rate down constantly towards the ultimate target of zero accidents.

We apply 4 safety values throughout the implementation of our safety culture:

1. EVERY ONE OF US is accountable for his/her own safety and that of his/her colleagues and contractors.
2. We have the right and obligation to STOP unsafe work and do it in a different way.
3. When you choose to work for Oleon, you choose to work according to our safety standards.
4. We believe we can avoid EVERY work related accident.

To ensure their own safety and that of their colleagues, employees of Oleon must undertake not to carry out their tasks under the influence of drugs or alcohol which might alter their good judgement or have a negative impact on the efficient and responsible execution of their tasks in total safety.



Harassment

Oleon protects its employees against all forms of harassment, intimidation and victimization, whether sexual, physical or psychological. Every employee has the right to a positive, harmonious and professional working environment and, in return, must act in a way that ensures such a working atmosphere. Oleon considers the following non-exhaustive list as unacceptable behavior:

- sexual harassment;
- offensive language or jokes;
- racial, ethnic, gender or religious slurs;
- degrading comments;
- intimidating or threatening behavior;
- showing hostility towards others because of individual characteristics.

Code of Ethics – Commercial practices



Assets of Oleon

The assets of Oleon must only be used for legitimate professional purposes. All employees must take care of company property and protect the company's assets against loss, damage, misuse and theft. Employees must ensure appropriate protection and respect for Oleon's intellectual property and know-how. Every employee must ensure appropriate use of the resources of the company and avoid all waste and misuse. They must use the resources made available to them for the due performance of their assignments, in compliance with the company's interests and the applicable rules.



Email and use of internet

The email systems and internet access provided to employees are strictly for professional use by the company. It is important to remember that the same care must be taken with emails as with any other form of written communication for professional use.

Internet access and the computers of Oleon must never be used to browse, transmit or download inappropriate content that does not correspond to professional criteria.

For more information, please refer to the IT policy.



Gifts and gratuities

Employees representing Oleon must avoid offering or accepting gifts or gratuities if it is likely that said gifts and gratuities are intended - or can be perceived as being intended - to exert inappropriate influence on the person receiving them. The term "gifts" designates objects, services, favors, loans, travel, accommodation, or the use of real estate, etc.



Confidential information

Each employee who has access to confidential information, either in his or her professional capacity or by coincidence, must take all necessary precautions to preserve this confidentiality. This obligation continues to apply to every employee after they have left the company.



Insider trading

The disclosure of confidential information is prohibited if it occurs either outside the normal framework of the professional function or task of a person working for the company or by executing other tasks in the name of the company. The persons having access to confidential information are not authorized to incite or to advise a third party to buy or sell securities for which this information proves to be useful. The additional or special rules and local laws concerning insider trading must be obeyed as long as they are in force.



Conflict of interest

An employee must not take personal advantage or profit from his or her role or function within Oleon and must not have direct or indirect interests in third parties (suppliers, customers, competitors etc.), if said interests are liable to influence his or her professional conduct.

The General Management of Oleon expects each employee to avoid any situation that could appear to lead to a conflict of interest.



Anti-corruption

Oleon employees are prohibited from making or approving any illegal payment. Moreover, it is illegal to promise, grant or give to a government employee, a private person or private entity any bribe or other illegal payment (or to give this impression).

The notion of "bribe" covers anything of value offered, promised, made or given with the aim of obtaining or keeping business or for any other illicit commercial gain. This includes cash or anything convertible into cash, gifts, travel, entertainment, services or loans.



Participation in companies or organizations external to Oleon

If Oleon employees, in their personal capacity, take part in or have any functions in associations, companies or any other entities outside of Oleon or exercise elected mandates in said organizations, they must make sure that this participation or exercise:

- does not imply any request for financial support from Oleon;
- does not interfere with their activity in Oleon, except in the case of trade union activities conforming to the legislation in force.

An employee holding management or directorship positions in an entity external to Oleon must not:

- present himself/herself or act as a representative of Oleon;
- use the funds, assets or credit of Oleon;
- require Oleon to pay for the costs or expenses incurred in this capacity.

Employees of Oleon, as part of their functions and at the request of the company, may be asked to join or participate in the work of companies, organizations or associations of a professional nature or to hold administrative or management positions in said entities on behalf of the company. The administrative or management positions that an employee may be asked to hold at the request of Oleon in a company or entity, are deemed to be part of the employee's normal responsibilities and are not subject to any additional remuneration. Therefore, if said company or entity pays the employee any sum of money for said positions, said payment must be handed over to Oleon.

Code of Ethics – Relations with third parties



Customers

Oleon is committed to meet the needs of its customers and to provide them with products and services of the highest quality. Employees, in their relations with customers, must conduct themselves in compliance with the Code of Ethics. Confidential, private or sensitive information concerning the customer is protected in compliance with the standards of the company concerned, and access to this information must be limited to the people who need to know.



Suppliers, partners and other third parties

Oleon handles the following supplier selection criteria:

Independence

Supplier selection must be objective and free of any consideration that is not directly related to the activities of the company.

Transparency

Supplier selection must be justifiable on ethical, objective and clear criteria consistent with the activity of the company. The criteria applied must be easily verifiable.

Performance

The criteria must give priority to the suppliers that are able to supply the best product and best service at the lowest costs. This capability is assessed on the basis of factors such as the quality, delivery lead times and competitiveness of the products and services proposed, while also taking in to account the reliability, stability and reputation of the suppliers. Any AVRIL Group company that can supply the needed products or services must always be contacted and if they can propose equivalent conditions, they must be granted priority.

Legality

Oleon undertakes not to do business with suppliers that engage in practices that are incorrect, in contradiction to the ethics of Oleon or illegal.

Also, Oleon and the AVRIL Group have established a Supplier Code of Conduct, in order to encourage, through its relations with suppliers, service providers and subcontractors, the application and implementation of its pledges in favor of sustainable development and the promotion of values corresponding to its corporate and social ethics.



Competition

Oleon acts in all fairness when dealing with its various suppliers and upholds the principle of fair competition, without discrimination or deceit. Oleon markets its products and promotes its services in all honesty, without ever acting illegally or in breach of the applicable laws in the attempt to win a contract. Oleon only uses legitimate resources to collect information concerning its competitors. Oleon undertakes to comply strictly with the competition laws applicable in the countries where it carries out its activities. As a general rule, these laws prohibit agreements or plans that can restrict or distort competition or trade. In particular, the following are prohibited:

- price fixing;
- rigging of bidding procedures;
- sharing of markets, territories or customers between competitors;
- boycotting or unequal treatment of certain customers or suppliers without legal justification.

The exchange or disclosure of sensitive commercial information concerning competitors, customers or suppliers is also liable to violate the applicable competition laws. All employees must at all times ensure compliance with these laws and regulations.

Management of the code



Recognizing an unethical action

If there is any doubt concerning a decision that has ethical implications in the working environment, you should ask yourself the following questions:

- Is this action legal?
- Is this action fair and honest?
- Has this action been carried out in a transparent way?



Reporting a violation?

Every Oleon employee who has knowledge of a possible violation of the Code of Ethics or a violation of the law by one of its employees has the duty to report this violation. Although it is normal to hesitate before reporting, employees are nevertheless strongly encouraged to do so, because remaining silent in the knowledge of this type of violation can have very serious consequences for Oleon. External persons and personnel present on an occasional basis can also report any serious incident that come to their knowledge. When reporting a violation of the Code of Ethics, the employee must follow the whistleblowing procedure applicable to where the employee is stationed.



Confidentiality and anonymity

Each request will be processed promptly and with discretion. Any person reporting a potential violation of the Code of Ethics has the right to anonymity. Confidentiality and/or anonymity will be respected. Oleon will do everything in its power to keep the person who reported the violation fully informed of the measures taken to resolve the situation.

No employee will be penalized, dismissed, demoted, suspended or subjected to discrimination for reporting a possible violation of the Code of Ethics, obtaining information on the subject or for requesting advice on how to handle the presumed violation.



Disciplinary action

Any violation of the letter or spirit of the Code of Ethics may result in disciplinary action appropriate to the committed violation. Said disciplinary action can result in dismissal. Any employee who breaks the law puts himself/herself and the company liable for the penalties applicable under criminal law (in particular fines and terms of imprisonment) and to civil legal action (claims for damages).

