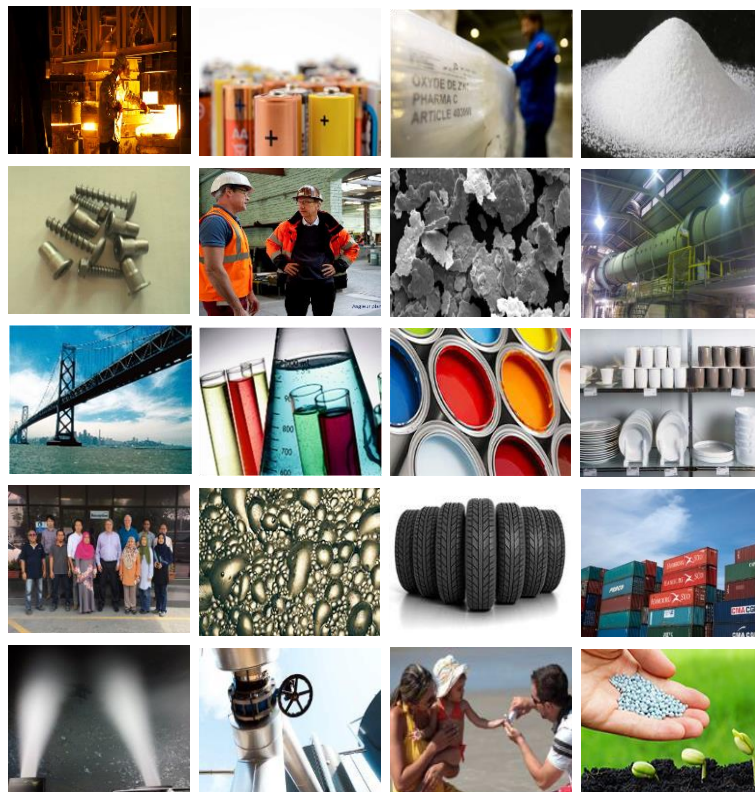


# EverZinc Global Code of Ethics



EverZinc, Global and Reliable Partner.  
We offer technological and innovative solutions that care  
about our environment.  
Respect and entrepreneurial spirit drive our team.



## Contents

<b>1. General</b>	<b>3</b>
<b>2. Scope &amp; Responsibility</b>	<b>3</b>
<b>3. Making legally and ethically acceptable decisions</b>	<b>3</b>
<b>4. EverZinc Values</b>	<b>4</b>
<b>5. Our Conduct as EverZinc employee or representative</b>	<b>5</b>
5.1 Avoiding Conflicts of interests	5
5.2 Protecting confidential information	5
5.3 Safeguarding assets and records	5
5.4 Valuing Diversity & Inclusion	5
5.5 Preventing Harassment and Discrimination	5
5.6 Safeguarding EverZinc reputation	6
5.7 Alcohol and substance abuse	6
5.8 Using equipment, information & communications system responsibly	6
<b>6. Our conduct towards EverZinc customers and suppliers</b>	<b>6</b>
<b>7. Our conduct on our marketplace</b>	<b>7</b>
7.1 Compliance with laws	7
7.2 Antitrust and competition	7
7.3 Protection human rights	7
<b>8. Violations of the Code of Ethics</b>	<b>7</b>
<b>9. In case of question</b>	<b>7</b>

## 1. General

EverZinc Global Code of Ethics outlines our expectations regarding employees' behaviour towards their colleagues, supervisors, suppliers, customers, neighbours, and overall organization.

We want to promote a well-organized, respectful and collaborative environment. EverZinc believes that success depends on creating and maintaining a relation of trust and professionalism with its main stakeholders namely its employees, commercial partners, shareholders, governmental authorities and the public.

This code of ethics provides a framework for what EverZinc considers responsible conduct, but it is not exhaustive. As a EverZinc employee, we should always strive to exercise good judgement, care and consideration in our daily work.

## 2. Scope & Responsibility

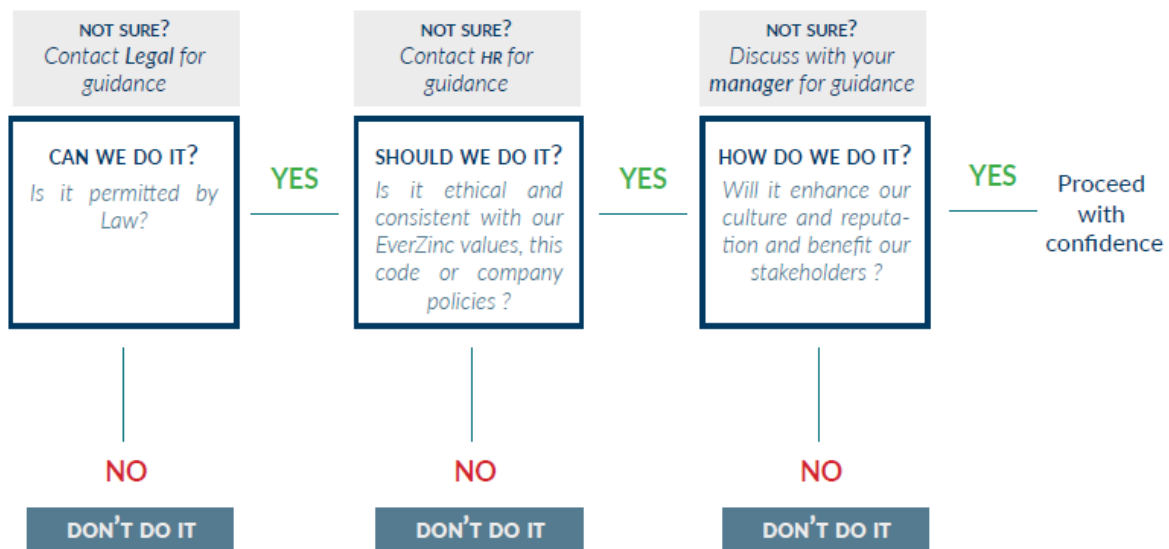
This policy applies to all our employees regardless of employment agreement or rank throughout the world. It also applies to any other person or entity acting on its behalf.

Each employee will receive a copy of this code of ethics, all management members have to promote it within their department.

You shall avoid acting or encouraging others to act contrary to this code of ethics. Each decision must be taken regarding legally and ethically aspects.

## 3. Making legally and ethically acceptable decisions

This decision tool can helps us to ensure we make the best choices :



#### 4. EverZinc Values

Our values are part of EverZinc DNA. They guide the way we work with our business partners, within our communities and with each other.

### TOGETHER, WE

#### CONTRIBUTE

##### Put a brick in the wall

To reach the objectives of EverZinc we all need to contribute

Be an actor of the future of EverZinc !

**OWN · TAKE INITIATIVES · BE PROACTIVE**

#### SIMPLIFY

##### Keep it simple

Anything with no value for the customer should be trashed. We are never afraid to be challenging on what we do.

No Waste process, no non added value activities, only efficiency.

**BE LEAN · STANDARDIZE · ASK CLEVER**

#### IMPROVE

##### We want more

Continuous improvement is utmost important in developing our business, therefore each of us needs to be a locomotive in our domain.

Status quo is not an option.

**PERSEVERE · BE CONSTRUCTIVE · SUGGEST**

#### INNOVATE

##### Think out of the box

Develop innovative but robust and relevant new ideas, follow trends closely, understand your customers unmet needs. Think differently and dare to break the rules

**EXPERIMENT · BE CREATIVE · SHARE**

#### ENJOY

##### Feel good about what you do

We are proud of what we do for EverZinc. We keep a positive state of mind and we treat our colleagues and relations in a positive way.

Be a part of your professional fulfillment.

**RESPECT · BE PROUD · BE POSITIVE**

### TO DEVELOP EVERZINC



## 5. Our Conduct as EverZinc employee or representative

### 5.1 Avoiding Conflicts of interests

Integrity – As a EverZinc employee or representative we cannot obtain advantages for ourselves (or related persons) that are improper on in any other way may harm EverZinc's interests. EverZinc's interests include financial performance, environment health and safety considerations, security, commercial and public reputation.

- We avoid putting ourselves in a position where our judgement and decision making could be improperly influenced by close personal and family relationships.
- We ensure that our investments and those of our close relatives don't create conflict of interests.
- We don't give or receive inappropriate gifts, favours and entertainment. Gifts and other favours can only be given or granted to business partners provided that they are modest, both with respect to value and frequency, and provided the time and place are appropriated. We are not allowed to offer or to receive monetary or other favours that may affect or appear to affect integrity and independence.
- The value cannot exceed 100€. Exceptionally with the Senior Leadership Team approval, you can accept gift or favours with a value higher than 100€.
- We may have our own business, a second job outside EverZinc but the use of EverZinc time, materials, financial assets or facilities for purposes not directly related to EverZinc is prohibited without authorisation. We each give our best effort every day at EverZinc, our other activities may not hinder our contribution to EverZinc.

If we are in a situation in which there may be a real or perceived conflict of interest, we must report the situation to our immediate superior and/or to our HR representative.

### 5.2 Protecting confidential information

Information, intellectual property such as copyrights, trade secrets, trademarks and innovative ideas are valuable EverZinc assets. These intangible assets must be managed appropriately and protected. Information other than general business knowledge and general work experience that becomes known to us in connection with performance of our work shall be regarded as confidential and treated as such.

### 5.3 Safeguarding assets and records

Safeguarding assets and records of EverZinc's customers and other business partners is the responsibility of all EverZinc employees and representatives. All such assets shall be used and maintained with care and respect while guarding against waste and abuse.

### 5.4 Valuing Diversity & Inclusion

Diversity – People and Ideas – inspires innovation and enhances our strengths in the global marketplace.

Fairly. We are treating employees and applicants for employment fairly. We seek to develop and retain a diverse workforce.

That means that we value individuals of diverse background, experiences, approaches and ideas.

### 5.5 Preventing Harassment and Discrimination

No-Discrimination – Every employee should be treated with respect regardless of their race, colour, ethnicity, national origin, religion, age, disability, medical condition, veteran status, marital status, gender, sexual orientation or gender identity.

No-Harassment – many forms of harassment are prohibited by the law. Behaviour that interferes with another's work environment or otherwise creates an offensive, intimidating, disruptive, abusive or hostile work environment are prohibited.



## **5.6 Safeguarding EverZinc reputation**

Non-disclosure and no-defamation - We all have a responsibility not to disclose company confidential and proprietary information without authorisation.

Using Social Media - Everything posted on social media could affect our reputation. We all share the responsibility to be good stewards of EverZinc.

## **5.7 Alcohol and substance abuse**

Prohibition - The use or possession of alcohol, illegal drugs, and other controlled substances in the workplace and being under the influence of these substances on the job and during working hours is strictly prohibited. However, possession of prescription medication for medical treatment is permitted.

## **5.8 Using equipment, information & communications system responsibly**

Prudence – We all must be prudent and responsible in our use of the company's information and communications equipment and systems.

We strictly prohibit the use of EverZinc systems for activities that are unlawful, unethical, or otherwise contrary to our policies.

## **6. Our conduct towards EverZinc customers and suppliers**

Delivering on quality, safety and reliable products - Our reputation is inside each kilo of materials we produce and sell. We ensure our customers can trust the high-quality of our products.

Each quality or safety issue must be reported to the supervisor.

Fair purchasing practices – We apply all those principles to our suppliers.



## 7. Our conduct on our marketplace

### 7.1 Compliance with laws

We shall comply with all applicable laws or regulations when conducting business on behalf of EverZinc. We shall not assist or participate in breach of laws by business partners, whether it constitutes an illegal act, for EverZinc or ourselves. It is our responsibility to seek to acquire a sufficient understanding of the applicable laws and regulations as they apply to our job.

### 7.2 Antitrust and competition

We shall comply with the antitrust and competition laws applicable. We should seek advice from our supervisor or our legal support in all matters involving risk of antitrust exposure for EverZinc, ourselves, or any of our reports.

### 7.3 Protection human rights

EverZinc embraces its responsibilities as a global corporate citizen in an increasingly interconnected and independent world. We believe in acting with integrity and showing respect, and expect the same of those who want to do business with us. We expect our business partners to act ethically and protect the rights of workers, regardless of gender.

We are committed to maintain an ethical and transparent supply chain free of forced labour, including slavery and human trafficking.

## 8. Violations of the Code of Ethics

Violations of this Code of Ethics will not be tolerated and may, in accordance with relevant legislation, lead to internal disciplinary actions, dismissal or even criminal prosecution. Each case shall be reviewed objectively and necessary corrections or remedial action to prevent recurrence will be taken.

All violations of this code of ethics should be recorded and reported through both the line management and HR channels.

## 9. In case of question

If we are in a situation in which there may be a conflict with this Global Code of Ethics or in case of question about the principles, we must report the situation to our immediate superior.

Last change done by :	Approved by :
- 1 <sup>st</sup> version available as from the 1 <sup>st</sup> of Sept 2017	SLT – August 2017