



PCB Chimie SAS

Code of Conduct

Distribution of Chemical Products

Introduction

As a small and medium-sized company (SME) specializing in the distribution of chemical products, PCB Chimie SAS is committed to upholding the highest standards of ethics, social responsibility, environmental protection and safety. This Code of Conduct applies to all employees, suppliers and business partners, and aims to define the behaviors expected in our professional activities.

1. Compliance with Regulations and Laws

We are committed to complying with all applicable laws and regulations, particularly those relating to safety, the environment, the distribution of chemical products and workers' rights. This includes:

- Compliance with REACH regulations (registration, evaluation, authorization and restriction of chemicals) and CLP (classification, labeling and packaging of substances and mixtures) — overseen by PROC-02.
- Compliance with local and international health, safety and environmental regulations.
- Continuous regulatory monitoring carried out by management (PROC-02 §4.6 and PROC-08).

2. Business Integrity and Ethics

We promote business conduct based on integrity and honesty. This includes:

- Transparency in our commercial relationships with our customers and suppliers.
- Refusal of any form of corruption, bribery or fraudulent practice.
- Confidentiality of commercial, technical and personal information, both internal and external to the company.

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3. Product and People Safety

Safety is a priority in the distribution of chemical products. We are committed to:

- Ensuring the safe handling of chemical products in accordance with safety standards, including the use of personal protective equipment (PPE) where necessary.
- Training and informing on the potential risks of distributed products, providing up-to-date safety data sheets (SDS) (annual campaign PROC-02 §4.2).
- Ensuring that our customers are informed of best practices for handling, storage and disposal of products (PROC-03).

4. Environmental Responsibility

We have a role to play in protecting the environment. As a distributor of chemical products, we are committed to:

- Minimizing our ecological footprint by using resources efficiently, reducing waste and optimizing hazardous waste management.
- Promoting environmentally friendly products to our customers.
- Taking preventive measures against pollution by ensuring that the transport, handling and storage of chemical products are carried out in a way that minimizes risks to the environment (PROC-04, PROC-07).

5. Human Rights and Working Conditions

Although our SME has fewer than five employees, we are committed to respecting fundamental human rights in all our professional relationships:

- Promoting equal opportunities, without discrimination based on gender, age, origin, religion or any other protected characteristic.
- Maintaining a respectful working environment free from harassment or intimidation.
- Respecting the rights of employees and subcontractors regarding working conditions, safety and health.
- Requiring from our suppliers respect for fundamental principles: no child labor, no forced labor, decent working conditions (POL-04 Responsible Purchasing Policy, FORM-01).

6. Relations with Suppliers and Partners

We are committed to maintaining trustful relationships with our suppliers and partners, based on:

- The selection of suppliers and partners who also respect ethical and environmental standards, as well as the requirements of the Responsible Care® program (PROC-01, POL-04).
- Cooperation with partners who share our commitment to quality, safety and the environment.
- Structured periodic evaluation (FORM-01 for suppliers, FORM-02 for service providers).

7. Conflicts of Interest

We expect every employee to manage any conflicts of interest in a transparent and ethical manner:

- Avoiding any situation where personal or family interests could conflict with the interests of the company.
- Immediately informing management of any real or potential conflict of interest.

8. Commitment to Continuous Improvement

We are committed to continuously improving our business and operational practices, by:

- Regularly identifying risks related to safety, the environment and ethics, and taking the necessary corrective measures (PROC-05, PROC-08 annual risks & opportunities review).
- Integrating feedback from customers, partners and stakeholders into our improvement processes (PROC-03 annual questionnaire, action plan MAN-02).
- Evolving our Quality / CSR management system and our policies in line with these feedback elements.

9. Reporting Concerns and Data Protection

Anyone (employee, supplier, service provider, customer, partner) may report, in good faith and in confidence, any conduct contrary to this Code or to the law, to our dedicated address ethique@pcbchimie.fr (procedure PROC-10). No retaliation will be tolerated against anyone who reports in good faith.

- Personal data of our employees, customers, suppliers and partners are collected only as strictly necessary, used solely for business purposes and protected in accordance with the GDPR (secure access, confidentiality, limited retention).
- This Code and the reporting procedure are reviewed every year with all employees.

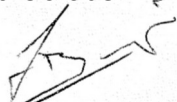
Operational Framework — Quality / CSR Management System

This Code of Conduct is part of PCB Chimie's Quality / CSR management system. It is consistent with POL-01 Quality Policy, POL-02 CSR Policy and POL-04 Responsible Purchasing Policy. Its operational implementation is based on the 9 procedures (PROC-01 to PROC-09) and the associated forms.

Conclusion

Compliance with this Code of Conduct is essential to maintain our integrity, protect our environment and ensure the safety of all parties involved in our distribution chain. As a 2-person SME, we have the responsibility to be exemplary in our practices, both ethically and operationally. Any violation of this Code will be treated with the utmost rigor to ensure that PCB Chimie SAS continues to meet the highest standards in its activities.

Date: 20 October 2026



Signed: Jean-Eric BOURGEOIS
Position: President of PCB Chimie SAS

Versio n	Date	Autho r	Nature of change
v1	September 2024	JEB	Initial release (signed, FR and EN versions).
v2	20/05/2026	JEB	Update: integration of references to the formalized management system.
v3	20/10/2026	JEB	Added § 9: reporting concerns (ethique@pcbchimie.fr, PROC-10) and data protection (GDPR).