

Delfingen

DELFINGEN S.A
DELFINGEN Group Anti-Corruption Code of Conduct
Editorial

7th of September 2021

The DELFINGEN Group is committed to acting in a responsible and ethical manner with its customers, suppliers, government administrations and all of its coworkers. **Integrity in business affairs** is a major element for the reputation of the DELFINGEN Group.

It is supported by:

- Our **values and mission statement** which were announced when the company was founded, and in 1984, in order to be recognized internationally (liberty, sharing, continuous improvement, and responsibility) and updated in 2020 : **Entrepreneurship, Solidarity, Harmony and Responsibility**.
- Our **Supplier Demand Dossier** enables selecting suppliers and partners based on objective criteria.
- A **general spirit** of responsibility in the business world, also illustrated by the DELFINGEN Foundation, whose purpose is to act in favor of less prosperous populations, in France, and worldwide.

Following the "Sapin 2" law dated December 9th, 2016 pertaining to transparency, the fight against corruption, and the modernization of the economy, the DELFINGEN Group edited an **Anti-Corruption Code of Conduct** co-built with MIDDLENEXT and other member companies.

Our Code of Conduct:

- Defines the **behavior standards** that apply to our business activities and general directives, mainly for decisions that the DELFINGEN Group coworkers need to follow for a variety of ethical issues;
- Describes the **basic rules** concerning a number of issues such as gifts and fringe benefits (see the DELFINGEN Group policy charter for gifts or fringe benefits), common courtesy practices, entertainment, donations to charities or political groups, facilitation payments, and/or any form of bribery;
- **Completes** the rules, regulations, and procedures for the standards, as defined in each country wherein our coworkers have standards to follow;
- In the DELFINGEN Group, it is applicable to **all coworkers**, the Board of Directors, managers, the Chief Executive Officer, and affiliate companies worldwide;
- It also applies to all DELFINGEN Group **partners** who must share the same values.

Strict compliance to the DELFINGEN Group Anti-Corruption Code of Conduct is a requirement for employment, and all coworkers (and the above-mentioned entities) will be provided with an updated copy of the Code of Conduct. No violations of the Code of Conduct will be tolerated.

Finally, the DELFINGEN Group has setup a warning system with [Integrity Line](#). For further information on the warning system it can be consulted [here](#).

For any information on the DELFINGEN Group Anti-Corruption Code of Conduct or the DELFINGEN Group policy charter for gifts or fringe benefits, please contact the DELFINGEN Group Ethics Committee using [Integrity Line](#) or by post to: Comité éthique, DELFINGEN S.A., Rue Emile Streit, 25340, Anteuil, France.

The Board of Directors

Delfingen

	Function	Name	Date
Written by	In-house counsel	Pierre LALLEMAND	18.11.2025
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Approved by	Legal Affairs Director	Anthony TYRODE	18.11.2025

Revision Index	Date	Change description
V1.07.09.2021	07.09.2021	Initial document
V.2.18.11.2025	18.11.2025	Change Logo, Adding Integrity Line