

DORIS GROUP

Code of Conduct

This document has been prepared by and is the property of DORIS Group S.A. It may not be reproduced or made available to third parties without the prior written consent of DORIS Group.

Vers.	Etat	Date	Auteur	Description	Vérifié par	Approuvé par
00	C	30/03/2022	NQ	APPROVED	FT	CD
01	C	10/06/2025	NQ	APPROVED	TG	CD

A = Published for comment - B = Published for approval - C = Approved

CODE OF CONDUCT



WE ENABLE CHANGE

TABLE OF CONTENTS

COMMITMENT FROM DORIS GROUP CEO	p. 1		
INTRODUCTION	p. 2		
Purpose	p. 2		
Personal responsibility	p. 2		
Commitment of governing bodies and managers responsibilities	p. 2		
Advice and raising concerns	p. 3		
Principles and values	p. 3		
BUSINESS INTEGRITY	p. 4	STAKEHOLDERS AND PARTNERS	p. 15
Global jurisdictions	p. 4	Accounting procedures	p. 15
Preventing & combating bribery, corruption & influence peddling	p. 4	Insider dealing	p. 15
Global risk mapping	p. 7	Anti-competitive behaviour	p. 15
Third party inherent risk and mitigation	p. 7	Relations with suppliers, partners and contractors	p. 15
Gifts and entertainment	p. 7	Local content	p. 16
Conflicts of interest	p. 9	Human rights	p. 16
Political contributions	p. 10	OUR ASSETS	p. 17
Lobbying	p. 11	Anti-money laundering	p. 17
Charitable donations	p. 11	Asset protection	p. 17
Facilitation payments	p. 11	Managing records properly	p. 17
Disciplinary regime	p. 11	Anti-tax evasion	p. 17
Whistleblowing system	p. 11	SAFEGUARDING INFORMATION	p. 18
Compliance training	p. 12	Personal information	p. 18
OUR PEOPLE	p. 13	Cyber security	p. 18
Relations with employees	p. 13	Confidentiality, privacy and property	p. 18
Equality, diversity and inclusion	p. 13	Media and external communications	p. 19
Workplace conduct	p. 13		
Alcohol and drugs	p. 13		
Modern slavery or human trafficking	p. 13	APPENDIX 1	
Safety, health, environment	p. 14	DORIS GROUP ETHICS CHART	p.20



COMMITMENT FROM DORIS GROUP CEO

The DORIS Group, with all its subsidiaries and business units ("DORIS"), conducts its business in the respect of ethical principles as an employer, as a business and as a responsible corporate citizen.

Integrity is the very foundation of the financial health and stability of any business over the long term. Conscious of this fact, DORIS seeks to apply the highest standards of ethics within the framework of its activity. Adhering to the values of honesty, integrity and fair competition is a key factor in DORIS' culture and success.

Any form of corruption or bribery is strictly prohibited at DORIS. This Code of Conduct, which reflects DORIS' commitment to fight against corruption, influence peddling and any other type of breach of integrity, is designed to help all our employees and third parties understand the risks associated with certain actions, to identify the circumstances that could lead to this type of action and to respond appropriately to these situations with the help of colleagues, the Compliance Team and Management.

Every DORIS employee has an important role to play in upholding the rules of ethics. This begins by being familiar with and acting in accordance with this Code of Conduct.

DORIS has zero tolerance for any deviations in terms of corruption and influence peddling and we are confident in the support of all employees in this regard.

Christophe DEBOUVRY
Chairman & Chief Executive Officer

INTRODUCTION

PURPOSE

DORIS Group ("DORIS"), its entities and its subsidiaries (hereafter known as 'DORIS') comply with the following **Ethical Principles**. These can be encompassed in five simple messages:

- To comply with **APPLICABLE LAWS** and **LOCAL REGULATIONS**;
- To establish a core culture of integrity and reject **ANY FORM OF CORRUPTION**;
- To behave **FAIRLY AND HONESTLY** and honor commitments;
- To respect others **WITHOUT DISCRIMINATION**;
- To contribute to a **POSITIVE WORKING ENVIRONMENT**.

DORIS is committed to upholding fair, **ethical and positive behaviour**. This Code of Conduct ("Code"), is a guide to the principles that govern the way we work with each other and our relationships with clients, suppliers, competitors, government bodies and the public, including our shareholders. This Code sets out our expectations to achieve this.



EMPLOYEES MUST READ, UNDERSTAND AND IMPLEMENT THIS CODE DURING DAY TO DAY WORK ACTIVITIES.

This Code outlines the rules and expectations of DORIS to protect the business and applies to all activities carried out by DORIS and concerns all employees, including senior management and the Board of Directors.

The Code also applies to every business partner: suppliers of goods and/or services, joint ventures partners, customers, contractors, and any other parties that DORIS has business relationships with.



DORIS IS COMMITTED TO ENSURING THAT ALL BUSINESS PARTNERS REVIEW AND ACCEPT THIS CODE BEFORE BEGINNING A BUSINESS RELATIONSHIP.

PERSONAL RESPONSIBILITY

It is each employee's responsibility to ensure **compliance and acting in accordance** with the Code. This Code is not a substitute for alleviating individuals of their responsibility to use personal judgement and common sense to make the right decision. Employees who have questions about the proper course of action in any given situation should consult with their Manager. No one will be allowed to justify a violation of this Code by claiming lack of understanding, confusion or ignorance concerning any provision.

This Code shall be issued as part of the induction process for all newcomers and to suppliers as part of any potential Agreement. It is also available on the DORIS intranets as well as internet sites, so that all the employees and partners have access thereto.

COMMITMENT OF GOVERNING BODIES AND MANAGERS RESPONSIBILITIES

THE CHIEF EXECUTIVE OFFICER OF DORIS GROUP is ultimately responsible for defining DORIS' principles of ethics and for ensuring that they are properly implemented, using the Compliance Management System in place and through the teams and individuals presented in the following paragraphs.

THE DORIS EXECUTIVE MANAGEMENT TEAMS of the entities and subsidiaries is responsible for the implementation of this Code. Day-to-day responsibility for compliance is delegated to these executive management teams.

The **DORIS COMPLIANCE TEAM** is responsible for:

- Promoting an ethical culture within the DORIS;
- Ensuring training of personnel;
- Generating, communicating and explaining the charters, codes or directives on which DORIS' ethical commitments are based, to the employees, in close collaboration with the Management of the entity;
- Identifying the ethical risks faced by the entity;
- Addressing all employees and business partner questions and concerns related to the Code.

MANAGERS who have direct reports have additional responsibilities under the Code to:

- Lead by example;
- Ensure training of personnel;
- Ensure personnel understands and complies with the Anti-Bribery and Anti-Corruption Program;
- Monitor business activities;
- Report any breaches to the Compliance Officer;
- Ensure that each employee working under their responsibility is able to raise questions and receive appropriate guidance and responses.

ADVICE AND RAISING CONCERNS

Every employee must read this Code of Conduct in full, comply with its principles and **promptly report any concerns or irregularities**, so as to avoid financial losses and protect the good reputation of DORIS.

This Code has been prepared to provide specific detail on standards expected. **In the event readers are unclear on any aspect of the Code, they should always seek further advice and guidance** from Managers, HR representatives or the Compliance team.



ANY SUSPECTED OR WITNESSED VIOLATIONS OF THE CODE OF CONDUCT CAN BE REPORTED, IN CONFIDENCE, TO THE CHIEF COMPLIANCE OFFICER AT*: COMPLIANCE.INCIDENT@DORISGROUP.COM

*See Whistleblowing System below (page 11).

PRINCIPLES AND VALUES

DORIS continuously seeks to achieve a positive outcome for all of its stakeholders (employees, clients, local communities and shareholders), while taking into consideration:

- Sustainability;
- Corporate Responsibility;
- Environmental protection;
- Economic growth;
- Social improvement.

DORIS' commitment to Corporate Social Responsibility is demonstrated by its adoption of the following core values in all of its activities:

- Applying the highest levels of Health, Safety and Environmental standards;
- Understand and comply with the laws and regulations of the countries that we work in;
- Minimising environmental impact;
- Engaging with local communities;
- Generating a balanced, positive impact for all of our stakeholders;
- Seeking to improve energy and material efficiency;
- Commitment to supporting the development of renewable energy sources alongside our traditional oil & gas developments business;
- Transparency and accountability throughout our business;
- Adherence to high ethical standards;
- Protecting the long-term viability of our business so that we can continue to make a positive difference in corporate social responsibility through all of our activities;
- Protection of Human Rights.

While consistently applying these core values we must be prepared to understand the opportunities and mitigate the risks associated with the changing needs and expectations of all our stakeholders to ensure the future viability of our business. DORIS also commits to the **UN Global Compact** and its ten fundamental business principles.

BUSINESS INTEGRITY

GLOBAL JURISDICTIONS

DORIS is operating from a number of countries and its largest entities are based in France, the United Kingdom and the United States of America. For that reason, every entity of DORIS must abide to these countries' anticorruption extraterritorial laws. Extraterritoriality concerns legal norms whose scope of application exceeds the territorial jurisdiction of the local entity.

The U.S. Foreign Corrupt Practices Act (FCPA) in the US (1977), UK Bribery Act (2010), French Criminal Law (2000), as well as other local laws that apply to DORIS' activities, prohibit bribery and corruption, provide for severe sanctions and call for bribery prevention.

The French Sapin II Law (2017) defines regulations to prevent, detect, and take corrective action against bribery and corruption. As such, DORIS is committed to implement a comprehensive compliance program that includes: (i) this anti-corruption code of conduct, (ii) a whistleblowing system, (iii) a risk mapping, (iv) procedures for conducting third-party due diligence, (v) compliance training, (vi) accounting and risk associated procedures, (vii) a disciplinary regime, and (viii) a procedure for measuring the effectiveness of the compliance program.

PREVENTING & COMBATING BRIBERY, CORRUPTION & INFLUENCE PEDDLING

DORIS definitions are:

CORRUPTION design a dishonest behavior by those in positions of power, such as managers or government officials, which covers various types of dishonest and unlawful practices such as bribery, embezzlement, fraud, nepotism, collusion and abuse of power.

BRIBERY is the act by which a person in a particular public or private office solicits/proposes or agrees/assigns a gift, an offer or a promise, with a view to performing, delaying or failing to perform an act, directly or indirectly, within the

scope of their duties. Corruption is deemed active for persons who reward favours and passive for those who accept the benefit.

Both the person soliciting/agreeing an undue advantage and the person proposing/assigning it might be personally subject to very serious criminal sanctions -in addition to the applicable disciplinary sanctions- and might also expose DORIS to such sanctions.

INFLUENCE PEDDLING is the act of a person (public or court official, private individual, international public or international justice official), of soliciting or approving, without any right, at any moment, directly or indirectly, offers, promises, gifts, presents or any benefits for himself/herself or for others to abuse or have abused his/her real or supposed influence in order to obtain preferential treatment, jobs, contracts or any other favourable decision from an authority or a public administration. Influence peddling is deemed active for persons who reward the use of influence by the official concerned and passive for those who use their influence.

Both the person who proposes to abuse his or her influence with an administration and the person who agrees to grant the latter an unjustified advantage so that such person abuse his or her influence might be exposed to very serious criminal sanctions -in addition to the applicable disciplinary sanctions- and might also expose DORIS to such sanctions.

For example, bribery or influence peddling is sanctioned in France by up to 10 years' imprisonment and a fine up to EUR 1,000,000 or twice the amount of the proceeds of the offence. The amount of the fine can be increased five-fold for legal entities such as DORIS. Numerous additional penalties may also apply.



DORIS OPERATES “ZERO TOLERANCE” WITH REGARDS TO ANY ACTS OF BRIBERY OR CORRUPTION, EITHER OFFERING OR ACCEPTING, REGARDLESS OF SIZE OR SCALE. ANY SUBSTANTIATED ACT WILL BE DEALT WITH IN ACCORDANCE WITH THE COMPANY DISCIPLINARY PROCEDURES.

Acts of bribery or corruption influence individuals in the performance of their duty and incline them to act dishonestly. DORIS deems that whether the payee or recipient of the act of bribery or corruption works in the public or private sector is irrelevant. However, increased vigilance is required if, in the performance of our duties, a relationship has to be established with representatives of the public sector, to obtain authorizations or accreditations. The regulations and laws governing the hiring of such representatives are particularly strict, and the slightest deviation, whether in the form of attempted or actual bribery, or simply any form of favoritism, is totally proscribed in most of the countries where DORIS operates.

Bribery can take many forms including but not limited to:

- Gifts and/or entertainment;
- Personal favours;
- Charitable donations or social contributions;
- Discounts on products or services;
- Loans at a favourable interest rate;
- Payment or reimbursement of travel expenses;
- Payment of an inflated price for a product / service.

On the basis of the global corruption and influence peddling risks mapping (see next §) updated in 2024, several examples of potential situations have been identified, as indicated below.



EXAMPLES ILLUSTRATING SITUATIONS IN WHICH A DORIS EMPLOYEE IS LIKELY TO FACE A RISK OF CORRUPTION:

• A client company issues a call for tenders for an engineering service. DORIS, in order to respond to the entire project, forms a consortium with a partner, or recruits a local subcontractor. The partner, to increase its chances of winning, decides to offer a bribe to the customer's representative and decision-maker. Even without its knowledge, DORIS is criminally liable;

• DORIS wants to develop his business in a new country, targeted for its huge market. It has no experience in this country and doesn't know the customers. DORIS decides to hire an agent to help with marketing and sales. Finally, an invitation to tender is issued by one of these prospects, and to increase DORIS's chances, the agent decides to offer a bribe to the customer's decision-maker.

Even without its knowledge, DORIS is criminally liable;

- A DORIS employee strongly wishes that DORIS be awarded a new contract but knows that the competition is tough and thus contacts a person from the customer in charge of the tender to offer her of him a gift (e.g. vacation) in exchange of a favourable decision;



CONTINUATION (EXAMPLES ILLUSTRATING SITUATIONS IN WHICH A DORIS EMPLOYEE IS LIKELY TO FACE A RISK OF CORRUPTION):

- DORIS has won a new project, and as soon as it begins, the customer's representative tries to impose a subcontractor of his choice on DORIS. DORIS complies, unaware that the manager of this subcontractor is in fact a close friend of the customer's representative, to whom he has promised a bribe in the event of success;
- A border control officer suggests that there is a problem with a visa or a residence permit but that things could be solved in exchange of a small gift or a gratuity;
- Accepting by a DORIS employee a gift from an existing supplier so that the same supplier be used for future works without any competitive selection process;
- A client's authority organizes a charity event to benefit a humanitarian association chaired by the wife of a senior civil servant. In reality, however, the association is not very active, and the funds are used entirely for personal purposes by the family of the senior civil servant;
- Representatives of professional supervisory authorities request "facilitation payments" from DORIS to grant authorizations or issue documents needed to obtain licenses, operating permits, or any documents required to work on site;
- The representative of a public customer, whose contract with DORIS is in progress, demands benefits not provided for in the contract, such as airline tickets, hotel stays or entertainment, or simply gifts.



EXAMPLES ILLUSTRATING SITUATIONS IN WHICH A DORIS EMPLOYEE IS LIKELY TO FACE AN ACT OF INFLUENCE PEDDLING:

- Offering a gift or a sum of money to a relative or a friend of a public official in order to use her/his influence with the latter to obtain a favourable decision in the scope of a contract-awarding process or a subcontractor validation process;
- A public official in a country or an "intermediary" contacts a DORIS employee suggesting that he can influence a person in charge of a decision concerning DORIS (a request for authorisation or licence) in exchange of a sum of money or a gift;
- Offering a gift or a sum of money to a public official so that he/she uses his/her influence on the minister in charge of approving subcontractors for oil field operators;
- Granting a job to a family member of a public official so that such family member uses her/his influence to obtain a favourable decision from the public official;
- Hiring a public official as a consultant to help obtain a favourable administrative decision through the influence of the person concerned on the decision-maker within the administration concerned.
- Engaging an intermediary to carry out any of the above acts of corruption.

GLOBAL RISK MAPPING

In compliance with legislation and with the aim to always adapt and improve this Code, DORIS conducts an external risk assesment in the form of a "risk mapping" which takes notably account of DORIS activities and operations, types of interactions with third parties and geographical zones involved. It is periodically updated and the most recent risk mapping update (2024) was led by DORIS' Management and Compliance Team, under the supervision of a steering committee made up of members of the Group's management body.

This compliance risk assessment helps DORIS to identify and take into account all its exposure, to maintain an inventory of regulatory obligations while prioritising on mitigating those compliance risks. By creating a risk assessment, DORIS can gain a high level view of risks that may impact the company, and will also have the opportunity to address those risks early on.

The results of the global risk mapping have a direct impact on all other internal policies adopted by DORIS in the scope of its Anti-Bribery and Anti-Corruption Programme.

THIRD PARTY INHERENT RISK AND MITIGATION

Third-party relationships such as suppliers, service providers but also customers, may create risks for group, including bribery and corruption exposure. In order to identify, mitigate, and potentially avoid these risks, DORIS is committed to evaluating the integrity of third parties with whom it does business.

This Due diligence is an important process that allows DORIS to understand the background, capability and potential risks and liabilities associated with a business partner prior to any contractual agreement being put in place. DORIS applies risk-based due diligence to all stakeholders and business partners which includes consideration of bribery and corruption risk.

The currently-applicable internal rules that must be followed by DORIS employees with respect to third-party due diligence are contained in the most recent version of the internal policy titled "Instruction For Assessing and Engaging Business Partners" and its "application guidelines", bearing number 110-0004-22-DOC-0891. It can be accessed in the group's intranet or consulted with a member of the Compliance Team.

The level and complexity of the due diligence varies according to the perceived risk. As a minimum, and in case a due diligence is effectively required under the internal policy, the due diligence will require a business partner questionnaire to be completed.

In the case of perceived higher risks, due diligence may require an assessment to be carried out by an independent external body. During the supplier onboarding process, Operations selecting the third party and later managing the relationship with it, will conduct the due diligence, with a support from the Compliance Officer where needed, and:

- Determine, by applying the procedure, the corruption risk exposure of the service we seek to procure and the country of origin;
- Sending-out an anti-corruption due diligence questionnaire to the prospective supplier;
- Review the responses to the questionnaire so as to determine whether the prospective supplier meet DORIS's compliance requirements.

GIFTS AND ENTERTAINMENT

Practices relating to gifts and invitations vary from country to country. They are generally offered in a spirit of goodwill, while in some parts of the world, refusing a gift or invitation is considered an insult by the person offering it. Conversely, accepting a gift or invitation can create a conflict of interest. Furthermore, gifts or invitations offered or accepted with the aim of obtaining a contract or competitive advantage may be considered as bribes or kickbacks.

In view of the very serious legal and reputational consequences that can result from an inappropriate gift, the general principle within DORIS is to avoid offering or receiving any gift from a third party.

DORIS Group has issued an instruction called “Instruction on Gifts and Hospitality”, number 110-0004-24-DOC-1160, to clarify accepted Group practice on these matters. It can be consulted on the Group's intranet sites or by contacting a member of the Compliance team.

OFFERING GIFTS

Offering low value items to promote, explain or provide a demonstration of the products or services marketed by DORIS is permitted. This includes “goodies” such as pens, coffee cups and other items, provided they are:

- Offered out of courtesy, as a sign of respect or gratitude, or to thank someone for their hospitality, according to the customs of the country;
- Unambiguously appropriate in form and value;
- Offered occasionally.

The following items or services **must not be offered to a client** under any circumstances:

- Cash or gift certificates or vouchers;
- Any tangible item of value such as watches and jewellery;
- Shares or other securities;
- Air tickets or other types of transportation;
- Job offers;
- Scholarships;
- and other similar items or services.

DORIS does not “buy” contracts and bases its success on the quality of its services as well as on its commitment to satisfy its clients.

IN PARTICULAR, EMPLOYEES OF DORIS ARE STRICTLY PROHIBITED FROM OFFERING ANY GIFTS OR BENEFITS MENTIONED ABOVE IN EXCHANGE FOR A CONTRACT WITH A CLIENT OR ANY UNDUE ADVANTAGE.

MEALS AND ENTERTAINMENT

DORIS may offer a client reasonable meals or other forms of entertainment as a courtesy in the normal course of business.

RECURRING, EXCESSIVE, EXTRAVAGANT OR LAVISH BUSINESS MEALS OR ENTERTAINMENT ARE PROHIBITED AS THEY MAY GIVE THE IMPRESSION OR SUGGEST THAT FAVOURS ARE EXPECTED IN RETURN.

The number of DORIS employees attending an event must be commensurate with the number of participants from the client side, and at least one employee must always be present. Another example of appropriate behaviour regarding invitations (as long as they are allowed by local laws) is “reciprocity”: never invite a client to a place where they would not be able to reciprocate the invitation.

If they have questions or suspect violations of these conditions, employees must consult with their Line Manager or the unit Compliance Officer.

ACCEPTING GIFTS

DORIS strictly limits the acceptance of rewards from clients, suppliers or other persons who may seek to influence the company's actions.

NO EMPLOYEE HAS THE RIGHT TO ACCEPT ANY REWARD, REGARDLESS OF ITS VALUE, WHICH MAY INFLUENCE, ATTEMPT TO INFLUENCE OR GIVE THE IMPRESSION OF INFLUENCING HIS/HER JUDGMENT.

The following acts are **unacceptable** under any circumstances:

- Accepting cash donations, regardless of the donor;

- Accepting any rewards for services provided (employees may accept a gift if it is not cash, if it is spontaneous, of small value and if it has not been offered for receiving favourable treatment for obtaining a contract);
- Direct or indirect solicitation of gifts from clients or suppliers;
- Accepting payments, loans, bribes or kickbacks from anyone;
- Accepting gifts from suppliers who participate in a tendering process.

As a general rule, DORIS forbids accepting any proposal from clients or suppliers, which seeks to cover expenses for travel, meals or accommodation as part of seminars, conferences or other events. This also applies to tickets for sports events or other public events. In the event that it is considered beneficial for the company that an employee attends an event to which they have been invited by a client, the expenses related to this event will be borne by DORIS.

There are, however, exceptions to this general rule, for example, if a DORIS Manager gives his/her approval. DORIS employees may accept meals, drinks or other discrete forms of hospitality or entertainment from clients or suppliers as a courtesy, in the normal course of their business, provided that:

- These offers are not made for the purpose of receiving favourable treatment in connection with obtaining a contract;
- These offers cannot be interpreted as an attempt to influence our actions;
- This practice is not widespread and recurrent;
- The value and frequency of these offers are not excessive.

EMPLOYEES MUST NOT ACCEPT ANY FORM OF ENTERTAINMENT FROM A CLIENT OR A SUPPLIER UNLESS IT HAS BEEN APPROVED BEFOREHAND BY ITS MANAGER.

If an employee refuses a gift, they must explain to the person offering it that DORIS' policies prohibit them from accepting it.

Employees must consult with their Manager or Compliance Officer if they have questions or suspect violations of these conditions.

CONFLICTS OF INTEREST

A conflict of interest is a situation in which the judgment of a person acting in a professional capacity may be influenced by a secondary interest, distinct from that of the company he/she represents.

The DORIS Group has issued an instruction called “Instruction on the Management of Conflicts of Interest”, number 110-0004-24-DOC-1161, to help employees identify situations at risk and encourage them to declare to their superiors any links of interest which they feel may expose them to a risk of conflict. It can be consulted on the Group's intranet sites or by contacting a member of the Compliance team.

SHOULD AN EMPLOYEE BE FOUND TO HAVE AFFORDED MORE OR LESS FAVOURABLE TREATMENT OR EXERCISED UNDUE INFLUENCE OVER A CLIENT/CUSTOMER/SUPPLIER/ CONTRACTOR BECAUSE OF A PERSONAL RELATIONSHIP, THEN THE MATTER WILL BE CONSIDERED AS A DISCIPLINARY ONE.

Any risk of conflict of interest that an employee would perceive, relating to a personal relationship should be declared to the employee's Manager and to the human resources lead.

A conflict of interest can also arise when an employee engages in any other work that could conflict with DORIS's business.

Employees are expected to devote their skills and attention during working hours entirely to DORIS.

During the period of employment, employees must not engage in any other work outside working hours for DORIS,



EXAMPLES ILLUSTRATING WHEN A DORIS EMPLOYEE IS LIKELY IN A SITUATION OF CONFLICT OF INTEREST:

- When a person (a DORIS employee or a shareholder of a DORIS entity), their family members, close relatives or friends have a substantial financial interest or have a substantial holding in a company that is a client, supplier, partner or competitor of DORIS;
- When, in the performance of his/her duties, a person is currently or has been in the last 12 months, in professional relation with a family member, friend or relative who is employed or works for a client, a third party or a competitor of DORIS, and that person may influence or have influenced professional decisions;
- When the person is involved or seeking to be involved as an employee, owner, consultant, or representative of an entity that operates in the same field as DORIS or that counts DORIS among its clients or suppliers.
- When the person is currently involved or has been involved in the last 12 months, in the governance of a commercial or non-profit organisation, and who is a client, partner or competitor of DORIS.

whether paid or unpaid and whether employed or self-employed, that is related or could conflict with DORIS' business, without the prior written permission of their Manager.

Permission will not be granted for an employee to engage in any activity that DORIS believes to be in direct or indirect competition with DORIS' business, or which in DORIS' view does or might impair that employee's ability to perform their duties for DORIS fully and efficiently. Employees who are found in breach of this provision will be subject to disciplinary action under DORIS' applicable disciplinary procedure.

Using DORIS' materials, equipment and/or premises to carry out work for clients or customers on a personal basis without permission is a disciplinary offence.

POLITICAL CONTRIBUTIONS

DORIS does not align itself with any political organisation. While it may involve itself with interaction with political parties or agents of government there is no particular preference or support for any single political party.

Furthermore DORIS does not make any political contributions whether in cash or any other way to any political candidate, party, committee, or their representatives.



DORIS DOES NOT PARTICIPATE IN ANY WAY IN POLITICAL PROCESSES OF HOST COUNTRIES.

This does not prohibit employees from individually supporting any political candidate or party. If employees decide to become personally involved in political activities, these shall only be undertaken on their own behalf, using personal time and without any reference to DORIS.

LOBBYING

Lobbying refers to the promotion of the interests of DORIS through the communication of objective, economic and technical data about the company to opinion leaders and/or leaders of communities in which the entities are based. The purpose of lobbying is to improve the reputation of DORIS, to promote its image, values, activities and services and to defend its interests. Lobbying can only be carried out at the initiative of the Group Chairman and Chief Executive Officer or Chief Executive Officer of the Entity.

CHARITABLE DONATIONS

DORIS supports charitable donations within the communities in which we work. Written authorisation should be obtained in accordance with the relevant authority matrix.

In some cases, a charitable donation may be seen as a disguised bribe, or political contribution, therefore donations should be made preferably in kind and fulfil a genuine local need. Cash donations should be paid direct to the charity with receipts being obtained.

Recipient organisations are subject to a due diligence, in application of the DORIS policy for Third Party vetting.

FACILITATION PAYMENTS

Facilitation payments, or gratifications are low-value payments designed to obtain, or speed-up routine services, usually from public officials, routine services. Such payments are generally made with the intention of speeding up a routine, non-discretionary action to which the person is already entitled to or as part of a contractual signing process.



EXAMPLES ILLUSTRATING SITUATIONS :

- Situations in which DORIS employees might be confronted with the risk of facilitation payments may involve obtaining visa, permits, telephone or electrical connections, processing of an invoice, expediting signature or the customs clearance of equipment, crossing a border;
- Other situations where DORIS would have mandated a third party to obtain authorizations, administrative documents such as visa, work permit, or the acceleration of the payment of its invoices by a customer and where this provider would propose to the personnel of the administration in charge gratifications to obtain that the requests of DORIS be treated in priority.

DORIS does not distinguish between facilitation payments and bribes.

Associates are encouraged to consult the above-mentioned "Instruction on Gifts and Hospitality", which also deals with gratuities, on the Group's intranet sites or with a member of the Compliance team.



FACILITATION PAYMENTS ARE PROHIBITED EXCEPT IN CASES INVOLVING THREATS TO PHYSICAL INTEGRITY OR PROPERTY DAMAGE. IT IS ALSO PROHIBITED TO AN EMPLOYEE OR A THIRD PARTY TO MAKE FACILITATION PAYMENTS ON BEHALF OF DORIS.

Anything that could be deemed a facilitation payment shall be made aware to senior management for prior approval and **recorded in the accounting book.**

DISCIPLINARY REGIME

Failure on the part of any DORIS employee to meet any of the standards embodied in this Code of Conduct may result in disciplinary action, including -if permitted under the applicable local law- dismissal, even for a first offense. In some cases, civil or criminal sanctions may apply.

Local law of the relevant DORIS entity shall apply for the sanctioning of an employee of this very entity who violated this Code of Conduct. In companies where disciplinary sanctions are provided for under the internal rules or "employee handbook" of the company, such disciplinary sanctions apply.

WHISTLEBLOWING SYSTEM

DORIS is committed to maintaining an environment where concerns can be raised and listened to and are acted on **without fear of retaliation.** Each employee should therefore feel at ease to report breaches. Examples of these concerns include actual or suspected incidents where there is:

- Any breach of the rules provided under this Code of Conduct, most notably those applicable to business integrity;
- Action or intention to commit a criminal offence;
- Disregard for the environment, health, safety or security;
- Financial irregularity or suspicion of bribery, fraud or theft;
- Bullying or harassment of an individual;
- Any action to hide or cover up wrongdoing.

Reports can be made by employees to their Managers or respective Compliance Officer. Employees may also send directly, either a simple email or an Ethics Notification Report (ENR) duly completed to the Group Chief Compliance Officer at:
compliance.incident@dorisgroup.com

The DORIS Group has issued an instruction called "DORIS Group Professional Reporting System", with its "Ethics Reporting Sheet" and its "application guide", which bears the number 110-0004-22-DOC-0898-FR, with the aim of explaining how the system works and encouraging employees to use it if they deem it necessary. It can be consulted on the group's intranet sites or from a member of the compliance team.

Relevant rules of the applicable law can also provide for other possibilities for reporting specific categories of breaches, including to the designated authorities.

✓ ———
ANY EMPLOYEE OR MANAGER OF DORIS, SHALL, NOTABLY, NOT INTIMIDATE, THREATEN, COERCE, DISCRIMINATE AGAINST, OR TAKE OTHER RETALIATORY ACTION AGAINST ANY EMPLOYEE OR OTHER INDIVIDUALS WHO REPORT, IN GOOD FAITH, ANY POTENTIAL OR ACTUAL VIOLATION OF THIS CODE OR PARTICIPATE IN A RELATED AUDIT OR INVESTIGATION.

Any failure to comply with this obligation will result in disciplinary action and may also give rise to criminal sanctions under applicable local law.

All reports will be treated by the Alert Committee, within DORIS in a full confidential manner so that a protection be ensured to the employee reporting a potential violation or breach.

All reported or suspected occurrences violating this Code will be promptly and thoroughly investigated. During its investigation into these matters, DORIS will work to ensure that all persons are given appropriate support and fair treatment.

If, after the breach of this Code has been reported, appropriate steps still have not been taken, the employee is encouraged to bring the matter to the attention of a Compliance Officer in person.

The exact rules governing DORIS' whistleblowing policy are detailed in the internal policy titled "Whistleblowing Policy", which is available in the group's intranet and whose most recent version can be also consulted with the Compliance Team.

COMPLIANCE TRAINING

DORIS regularly provides to its employees training on all topics covering Business Integrity matters, including Anti-Bribery and Anti-Corruption. Training sessions are mandatory can be organised both at the group level -under the supervision of the Chief Compliance Officer- and by each of the entities -under the supervision of the Compliance Officers- and conducted on-site and online. It is the responsibility of each Manager to ensure that staff exposed to risks of corruption or influence peddling are trained on the integrity programme.

In addition, the DORIS Group implements an integrity training campaign each year in the form of e-learning. These training courses must be completed by all employees exposed to the subject matter.

✓ ———
IT IS THE RESPONSIBILITY OF EACH MANAGER TO ENSURE THAT STAFF EXPOSED TO RISKS OF CORRUPTION OR INFLUENCE PEDDLING ARE TRAINED IN THE INTEGRITY PROGRAM.

The DORIS Group has issued an organizational memo called "Compliance Training Plan," numbered 110-0004-24-DOC-117. It can be viewed on the group's intranet sites or from a member of the compliance team.

OUR PEOPLE

RELATIONS WITH EMPLOYEES

Everyone who works for or on behalf of DORIS is valued for their different skills, abilities, creativity and the differing backgrounds and experience that they bring to our business. All our people contribute to our success and in maintaining our good reputation.

Any form of victimisation, bullying or harassment is a potential disciplinary matter and will be dealt with as such. It may also lead to criminal sanctions under the applicable local law.

ALCOHOL AND DRUGS

DORIS has the responsibility to ensure the health, safety and welfare of our employees in their workplace and those who may be affected by our operations. We recognise that the abuse and misuse of drugs, alcohol and other substances can damage health, impair judgement, increase reaction time and thus create unsafe working conditions that could result in injury, damage to assets and impact on the reputation of the business.

DORIS has a zero-tolerance policy towards alcohol and substance abuse. Employees must abide by their regional drug, alcohol and substance abuse policies. Breaches of this policy will be subject to disciplinary action and may also lead to other legal sanctions, including criminal ones, under the applicable local law.

MODERN SLAVERY OR HUMAN TRAFFICKING

DORIS has a zero-tolerance approach to slavery and are committed to acting ethically and with integrity in all our business relationships to ensure slavery is not taking place in the business or the supply chain.

DORIS prohibits the use of under-age, forced or bonded labour and is committed to conducting, in cases it is deemed adequate or specifically required by local law, appropriate due diligence on our suppliers in respect of risks related to human rights and labour conditions. All suppliers are required to perform their work in a manner consistent with the Code and their performance is subject to ad-hoc audit.

DORIS will not tolerate child labour and will also take, in cases it is deemed adequate or specifically required by local law, appropriate measures in case child abuse is

EQUALITY, DIVERSITY AND INCLUSION

DORIS aims to create an inclusive working environment that values equality and diversity through fairness of treatment, work-life balance, and the elimination of discrimination, bullying and harassment from the workplace.

All staff shall, in all aspects of employment, avoid discrimination and take personal responsibility to ensure a fair and equitable workplace. When working with other staff and persons visiting DORIS' offices or in any related activities, employees must observe all legal requirements including those governing equal opportunities on grounds of age, disability, sex, marriage or civil partnership, pregnancy or maternity, race, religion, belief, gender reassignment or sexual orientation.

✓ ———
ANY ACT OF DISCRIMINATION BY EMPLOYEES OR ANY FAILURE TO COMPLY WILL RESULT IN DISCIPLINARY ACTION AND MAY ALSO LEAD TO CRIMINAL SANCTIONS UNDER THE APPLICABLE LOCAL LAW.

WORKPLACE CONDUCT

DORIS is committed to creating a supportive working environment where individuals are respected and concerns can be raised openly without fear of retaliation. We will not tolerate abuse, bullying, harassment or victimisation at work, whatever the motivation, and will endeavour to ensure that it is not overlooked or condoned.

suspected with one of our suppliers, subcontractors, partners or any other third party we do business with. Similarly, DORIS will not tolerate any form of human trafficking, forced labour or slavery, neither within its own organisation nor from its subcontractors, suppliers or any other third parties it does business with.

Any breach may result in criminal sanctions, in addition to the disciplinary ones.

SAFETY, HEALTH, ENVIRONMENT

DORIS recognises that our long-term business success depends on **our ability to effectively manage major accident hazards** to protect the people that work for and with us, those that are affected by our activities and the environment in which we work, while continually improving the quality of our services and products. We realise that the standard we expect can only be delivered by applying a rigorous Health, Safety and Environment policy, supported by clear and open communication channels.

We expect business partners to provide safe and healthy working conditions and take appropriate precautionary measures to protect employees from work related hazards and anticipated dangers in the workplace in accordance with all applicable Laws and regulations.

STAKEHOLDERS AND PARTNERS

Our business requires that we work with a wide variety of stakeholders and partners, including regulatory bodies, shareholders, clients, local and international suppliers.

ACCOUNTING PROCEDURES AND INTERNAL CONTROL

DORIS is committed to maintaining accurate financial records. Accurate and complete information is essential to support sound business decisions, to comply with our legal and regulatory obligations and to meet our responsibilities to all our stakeholders.

DORIS has a duty to ensure all entries in our financial records are an honest reflection of our financial position. We maintain effective internal accounting standards and procedures, and we **design and execute effective controls** to ensure that all financial transactions are properly authorised, recorded and reported and to detect any fraud, including bribery and corruption. All books, records and accounts must reflect all transactions, in connection with our business, accurately, transparently and in sufficient detail, in accordance with accounting regulations in force.

The DORIS Group has issued a series of general instructions aimed at implementing an internal control policy, including anti-corruption accounting controls. In addition, the finance and compliance departments issue every year an organizational note for the planned control campaigns.

INSIDER DEALING

In the course of his or her duties, an employee may gain access to sensitive information that is directly or indirectly related to DORIS and that may have a significant impact on the business, before it becomes public; this is known as "insider information". This information must remain strictly confidential until DORIS discloses it to the public.

Using or attempting to use, directly or indirectly, insider information for personal gain, or communicating it to any person before it is officially disclosed, is prohibited.

These rules also apply to information learned about other companies that would be listed on the stock exchange, including customers, suppliers and business partners. Disclosing it would be a breach of securities laws, subject to severe penalties, including fines or imprisonment.

ANTI-COMPETITIVE BEHAVIOUR

Competition legislation prevents companies from undertaking or participating in anti-competitive behaviour. While the laws in different countries may vary, DORIS is committed to complying with the general principles as defined in the applicable local law and European law across its business and internationally.

DORIS defines anti-competitive behaviour as;

- Colluding with competitors to fix prices;
- Sharing information that affects the impartiality of a competitive bidding process;
- Using inappropriate methods to gather competitor information (theft, bribery, misrepresentation or deliberate electronic interference).

While normal business practices are undertaken to inform DORIS of its competitive position in the market place, all DORIS personnel must ensure that they undertake their work in a legal and transparent manner.

RELATIONS WITH SUPPLIERS, PARTNERS AND CONTRACTORS

The quality of the services provided by DORIS to its clients depends on its capacity to receive excellent services from its own suppliers, partners and subcontractors.

The suppliers, partners and subcontractors must be impartially and carefully selected.

OUR ASSETS

ANTI-MONEY LAUNDERING

Money laundering is the process by which money is concealed or disguised illegally by making it appear legitimate.

If employees are ever asked to accept or make a payment in cash, to a bank or beneficiary or in a currency which has not been previously authorised or are uncomfortable about any aspect of a financial transaction, they should always seek advice from the line or functional manager prior to taking any action.

ASSET PROTECTION

DORIS is responsible for protecting all their assets which include property, facilities, equipment, IT equipment, funds, technology, patents, softwares, copyrights, information/ data and any other resources or property.

All staff are responsible for protecting DORIS assets against waste, loss, damage, misuse, theft, misappropriation or infringement, and for using all the assets responsibly.

MANAGING RECORDS PROPERLY

All company financial information and other records must be transparent, accurate and complete, and conform to generally accepted accounting principles and DORIS policies. Managing and safe-guarding records properly helps us avoid serious business risks that could have a legal or financial consequence for our company.

ANTI-TAX EVASION

DORIS has a zero-tolerance approach to all forms of tax evasion under any local law that may be applicable to its operations, including French, US and UK laws. Employees and Managers of the Company must not undertake any transactions which :

- (a) cause the Company to commit a tax evasion offence;
- or
- (b) facilitate a tax evasion offence by a third party which is not an associate of the Company.

DORIS is committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever it operates and implementing and enforcing, where required by local laws, effective systems to counter tax evasion facilitation.

For relevant jurisdiction, see further details in dedicated appendix.

DORIS definitions are:

TAX means all forms of taxation in the country, including but not limited to corporation tax, income tax, value added tax, stamp duty, stamp duty land tax, taxes on transactions and properties, national social insurance contributions (and their equivalents in any foreign jurisdiction) and includes duty and any other form of taxation (however described).

TAX EVASION means an offence of cheating the public revenue/tax authorities or fraudulently evading tax, and is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.

TAX AVOIDANCE or tax planning is not illegal and involves taking steps, within the law, to minimise tax payable (or maximise tax reliefs).

DORIS uses fair and transparent methods to assess them :

- The suppliers, partners and subcontractors are selected for their professionalism and competitiveness;
- Only those who fulfil our criteria of safety, quality, integrity, service and price equality can be shortlisted;
- The quality principles are also expressed through the response to environmental and social issues.

Relationship with the suppliers, partners and subcontractors must be guided by principles of loyalty and mutual respect.

LOCAL CONTENT

DORIS is committed where, when and if possible to encourage local content to support our business activities and will engage with local communities where there are any potential impacts from our business activities. We expect our employees to have the upmost respect for the local communities and to conduct business in an open and honest manner maintaining mutual respect.

HUMAN RIGHTS

DORIS is fully supportive of the principles set out in the Universal Declaration of Human Rights.

This includes the support and respect of the protection of internationally proclaimed human rights and we make sure we are not involved in human rights abuses.

SAFEGUARDING INFORMATION

DORIS is committed to **collecting, storing, managing and protecting our information** in accordance with the relevant legislation and to prevent unauthorised disclosure.

We recognise that information is key to enable us to make informed decisions. Employees must protect DORIS from unauthorised access, disclosure or loss at all times.

PERSONAL INFORMATION

DORIS is committed to **protecting the privacy of individuals** and several local notices explain how we use and secure personal data and provide employees with the necessary information regarding employee rights and our obligations, and explain how, why and when we process personal data.

All information gathered by DORIS on each employee is considered to be confidential and will be collected and processed in accordance with the General Data Protection Regulation (GDPR), or any other local laws and regulations related to data protection that may be applicable.

No employee is allowed to **distribute or disclose personal information** of any of his or her colleagues without his or her prior consent. DORIS is responsible for identifying, evaluating and reporting on information security risks in a manner that meets compliance and regulatory requirements, including GDPR. As such it develops, maintains and monitors practices to ensure that personal information is protected against inappropriate alteration, physically and logically secured, and its availability is guaranteed to authorised users only.

CYBER SECURITY

Cyber security is the name for the safeguards taken to avoid or reduce any disruption from an attack on data, computer or mobile devices.



OUR STAFF ARE KEY TO ENSURING THE INTEGRITY OF OUR SYSTEMS AND SHOULD FAMILIARISE THEMSELVES WITH THE ICT* SUITE OF POLICIES AND REPORT ANYTHING SUSPICIOUS IMMEDIATELY TO THE ICT HELPDESK.

* ICT : Information and communication technologies

All suppliers to DORIS are expected to implement systems, procedures and software to protect and safeguard DORIS information that is shared with them and to take all reasonable precautions to protect such information.

For further information our Cyber Security Guidelines outlines our provisions for preserving the security of our data and technology infrastructure.

CONFIDENTIALITY, PRIVACY AND PROPERTY

All personnel working for DORIS must abide to the company's policy on confidentiality of its business affairs and that of its clients and other stakeholders. Unless required in the course of employment, confidential information, intellectual property or other commercially sensitive information **should never be disclosed**. DORIS has a commitment to its personnel to comply with applicable data protection laws which ensure that there are adequate processes in place to protect personal data and that it only uses personal data for the purposes for which it was collected. DORIS will also ensure there are adequate controls in place to protect that data from misuse.

During the course of its business DORIS produces and processes valuable business information, belonging to

DORIS or its clients, which could include (but is not limited to) databases, technical knowledge, marketing strategies, plans, research and technical data and business strategies. **This intellectual property shall only be used for the benefit of DORIS and its clients** and any intellectual property that is produced by personnel while working for DORIS belongs to DORIS.

In its cyber-security processes, DORIS protects its Client data which is usually provided with contractual confidentiality obligations; this data is treated as valuable as DORIS data.



DORIS PERSONNEL WILL ENSURE THAT, AT ALL TIMES, THEY PROTECT THE PROPERTY AND ASSETS OF THE COMPANY AND OF ITS CLIENTS AND THAT THESE ARE UTILISED FOR THE PURPOSE OF THE BUSINESS AND ITS SHAREHOLDERS.

MEDIA AND EXTERNAL COMMUNICATIONS

DORIS' personnel will ensure that procedures are complied with and that only authorised DORIS personnel release statements to the media. The General Management of the DORIS Group oversees the relationship with the media. When communicating with the media, the information given shall be truthful.

DORIS should only be represented for communication with the public by those who are specifically trained in particular areas and whose job responsibilities include communication with the public or media. Employees must not make any public communication (including social media) regarding DORIS, its business or its stakeholders (including specifically clients) unless authorised in writing to do so.

Employees are not allowed to make derogatory comments about DORIS, express or endorse controversial personal opinions or use derogatory, discriminatory or defamatory language via social networks, when using their professional address or Company IT equipment or software.



Ethics Charter

DORIS Group, its Affiliates and Subsidiaries (hereinafter "DORIS") is committed to ensure that fundamental ethical requirements are continuously promoted and implemented in the group and form an integral part of DORIS 's culture.

DORIS provides management, engineering, procurement and construction assistance services to energy companies. As an independent partner, DORIS is committed to provide sustainable services to its clients under rules of good conduct.

DORIS's ethical principles can be encompassed in five simple messages:

- To comply with applicable laws and local regulations,
- To establish a core culture of integrity and reject any form of corruption,
- To behave fairly and honestly and honour commitments,
- To respect others without discrimination,
- To contribute to a positive working environment,

as an employer,

as a business,

as a responsible corporate citizen.

DORIS's Chief Compliance Officer is appointed by the Chief Executive Officer to develop, maintain, control and disseminate these ethical principles under DORIS's Code of Conduct.

DORIS's management is responsible for making the ethical rules known and observed at all levels of the organization, under the authority of DORIS's Chief Compliance Officer.

All employees working at DORIS are required to comply with the values and standards which are set out in DORIS's Code of Conduct, and collaborate by setting an example both within and outside the group. They shall report any situation having an adverse effect on ethics.

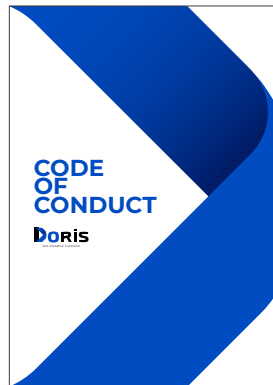
The commitment to values of honesty and fair competition is a key contributor to the DORIS's culture and to its success.


Christophe Debouvry
Chairman & Chief Executive Officer


Nicolas Quesnel
Group Compliance Officer

Document : 110-0004-19-POL-0245-EN
Révision : 3
Date : 15/02/2022

Document: 110-0004-22-DOC-0896 EN
Version: 01
2025



dorisgroup.com

