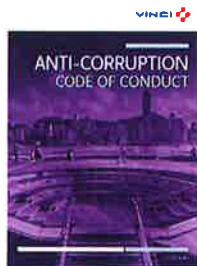


## Code of Ethics and Compliance Policy 2023

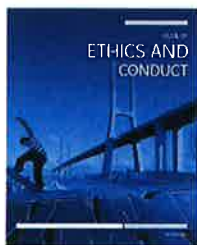
VINCI Energies Oil & Gas Business Units conduct most of their business internationally.

They attach major value to the respect of legality in each of the countries where they operate and are committed to promoting anti-corruption, ethical and human rights-compliant behaviour in the management of their business, their projects and towards their employees, subcontractors and customers.

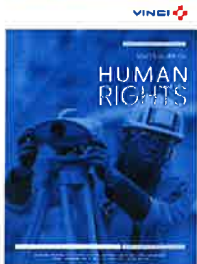
This behaviour relies primarily on our employees, as well as on certain third parties who act on our behalf. In this context, the VINCI Energies Oil & Gas Division and its Business Units are committed:



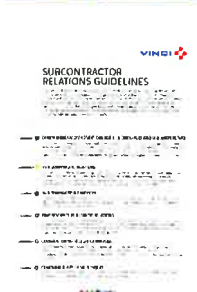
- To make all their employees, as well as third parties acting on their behalf, aware of the need to comply with the «**Code of Ethics and Conduct**», the «**Anti-Corruption Code of Conduct**», the «**VINCI's Guide on Human Rights**» and the «**Subcontractor Relations Guidelines**» issued by the VINCI Group, which form an integral part of its culture, are handed over to and validated by senior managers within the Group, and which set out the rules to which everyone must refer and which must be applied in all circumstances on a daily basis in the context of their professional activities and in all circumstances during their missions;



- To report or indicate any behaviour or action likely to jeopardise the activities of Business Units, whether they are part of the Division or the VINCI Group;
- Implement principles of transparency in the collection, processing and storage of personal data and ensure that employees are aware of and apply these rules;



- Avoid all measures that may violate human rights; and vigilance to combat all forms of harassment;
- To respect Human Rights by combating all acts of discrimination, making no distinction on the basis of gender, age, origin, disability or social status during recruitment;



- To implement the appropriate means and working conditions, guaranteeing the physical integrity and health of their employees as well as that of the people present on their sites;
- To maintain a long-term relationship with their subcontractors, based on compliance with the VINCI Group's Subcontractor Relations Guidelines and the VINCI Energies International & Systems Division's Ethics & Compliance in Purchasing Guide.;

This Policy strictly applies to all employees, managers, suppliers and subcontractors of the VINCI Energies Oil & Gas Division, as well as to any other person associated with it, in all regions in which the Business Units of the Division operate, regardless of their area of expertise or functions. It must be accessible, known and respected by all.

  
Philippe DAVIN  
Managing Director VINCI Energies Oil & Gas