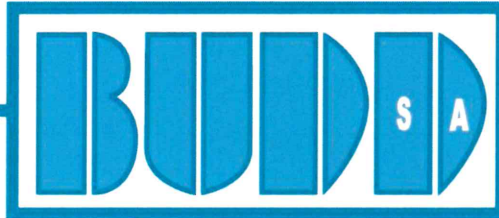


— ESTABLISHED 1850

L. THOS & GEO BUDD

CORRESPONDENTS OF

\_\_\_\_\_ P. & I. CLUBS



7, rue Bailli de Suffren  
CS 80034  
13231 MARSEILLE Cedex 1

Tél. +(33)4 91 33 58 33  
Fax. +(33)4 91 33 13 31  
general.marseille@budd-pni.com

For the attention of  
All Budd Group Staff, Sub-Contractors & Service-Providers

19 March 2021

## CHARTER OF ETHICS BUDD GROUP

In accordance with the present Charter of Ethics relating to its professional activities and interventions, the BUDD Group, as well as its employees, sub-contractors and third-party service providers, undertakes to exercise impeccable professional ethics and integrity. These ethics must be strictly and consistently applied, in all countries and in all circumstances, to all actions relating to the management of files and all services carried out on behalf of BUDD SA or its subsidiaries. These obligations include, but are not limited to, refraining from the following forbidden acts: effecting any transaction for personal or fraudulent gain to the detriment of the BUDD Group and/or their clients, embezzlement or any form of bribery. In this regard, the staff, employees and partners of the BUDD Group undertake to comply scrupulously with the provisions of the UK BRIBERY ACT in order to avoid, detect, prevent and denounce any acts of corruption.

This charter also provides that any member of staff, employee or service-provider with knowledge of any wrongful deeds or misconduct in contravention of the above-mentioned rules, immediately refers the matter to his local director, as well as to the Group's General Management, so that they can take measures to end the misconduct or wrongdoing and sanction the person or persons concerned(s). In order to expose and prevent acts that would be contrary to the Group's ethics, employees or service-providers must not only immediately, openly and always, inform the Group's General Management of any proven or observed wrongdoing, but also of any suspicion of any such acts.

If there is any doubt about the meaning, interpretation or application of this Charter of Ethics, the Group's General Management in Paris or Marseille, whose contact details are shown herein, should be consulted.

This Charter is being circulated to all employees and service-providers of the Group who must textually confirm their compliance on receipt of this document.

JAMES BUDD  
President & Chief Executive Officer

A handwritten signature in black ink, appearing to be 'JB', written over a horizontal line.

**BUDD S.A.**  
7, Rue Bailli de Suffren  
13001 MARSEILLE  
Tél. 04 91 33 58 33 - Fax : 04 91 33 13 31

**Name and Surname** :

**Company Name** :

**Country** :

**Date and Signature** :

*(preceded by the mention  
read and approved)*

[www.budd-pni.com](http://www.budd-pni.com)

SOCIETE ANONYME AU CAPITAL DE 300 000 EUROS  
300 643 830 RCS MARSEILLE - VAT IDENT. N° FR 88 300 643 830  
SIEGE SOCIAL : 7, RUE BAILLI DE SUFFREN - 13001 MARSEILLE

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