



People

HIGH STAFF
EMPOWERMENT

Partners

HIGH SOCIETAL
COMMITMENT

ETHICAL CHARTER/ 2026

 GROUPE
ATLANTIC

atlantic

ideal

Thermor

Jauter

FE

ACV

GLEDHILL

Hamworthy

ORCON

lazzarini

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CLADE

tharcon

GROUPE ATLANTIC is a European leader in thermal comfort, with a presence on four continents.

The Group's growth and success are based on strong values and seven founding principles that are at the heart of our relationships with our employees and all our stakeholders, in particular "commit and meet commitments with transparency". Because our ambition is to guarantee the respect and well-being of our employees, the Group wishes to use this ethical charter to reiterate the principles and rules of conduct that must guide our actions and decisions on a daily basis.

As a reference framework, this charter therefore covers various topics (respect for human rights, diversity, safety at work, etc.) that the Group considers essential and on which it wishes to work with you.

These rules apply to each and every one of us without exception, as we must all contribute through our behaviour to reinforcing the Group's commitment to "**High well-being**" and its reputation.

International standards

- GROUPE ATLANTIC adheres to international standards, including the Universal declaration of human rights, the UN Guiding Principles on business and human rights, as well as the core conventions of the International Labour Organization (ILO).
- We are committed to regularly evaluating our practices, improving our processes, and actively promoting fair and equitable working conditions at all our sites.

Isabelle Savidan
CSR Director





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CHILD LABOUR AND FORCED LABOUR

GROUPE ATLANTIC is committed to conducting its business in a responsible manner, respecting human rights and complying with international labour standards. We believe that respect for human dignity is essential to our sustainable development and to maintaining the trust of our employees, our partners, and customers.

PROHIBITION OF CHILD LABOUR

GROUPE ATLANTIC strictly prohibits all forms of child labour within its own activities and throughout its supply chain.

- We comply with the minimum legal working age as defined by local legislation
- Verification measures are carried out during recruitment to prevent any situation involving child labour
- In the context of internships or work-study programs involving minors:
 - We are committed to complying with the legal framework and educational program defined by the educational institution in order to create a safe working environment and promote skills development
 - Apprenticeship contracts must not under any circumstances constitute the majority of a department's workforce. They are concluded as part of an educational program and are limited in time.

PROHIBITION OF FORCED LABOUR AND HUMAN TRAFFICKING

GROUPE ATLANTIC prohibits all forms of forced, compulsory, or coerced labour, including debt bondage, human trafficking, and any practice that deprives individuals of their freedom.

- No employee may be forced to work through threats, coercion, or the withholding of identity documents
- Free and informed consent is a prerequisite for any employment contract within the Group.

WORKING CONDITIONS

GROUPE ATLANTIC positions itself as a benchmark in the labour market and is committed to offering attractive and respectful working conditions in order to retain and build loyalty among its employees, who are the driving force behind the company.

This commitment is based on four pillars.

WORKING HOURS:

We comply with the working hour limits imposed locally by regulations, and our overall objective, given the diversity of our locations and regulations, is to comply as much as possible with ILO conventions when they are more favorable.

Every employee is entitled to take at least one day off per week and a daily break, either consecutive or split, to allow them to eat and recharge.

Every employee is entitled to paid annual leave and local and national holidays as provided by local law.

WORK-LIFE BALANCE:

To encourage long-term commitment from our teams, we have implemented a work organization across all our sites that promotes a healthy work-life balance at every stage of an employee's career.

COMPENSATION AND BENEFITS:

Given the competitive work environment and diversity of our locations, we are gradually rolling out a comprehensive compensation strategy for all :

- **Fair compensation** consistent with the level of the position and its responsibilities, reflecting the value brought to the organization and in line with market practices.

This may consist of a fixed salary and additional variable components.

- **Employee benefits** that contribute to the security of employees and their families. Individual health insurance as a common foundation across all our sites and additional benefits tailored to local practices.

WELL-BEING AT WORK:

In a context where the link between work and health has become increasingly clear, GROUPE ATLANTIC is aware of the role of the company to make workplaces drivers of mental health and well-being for its teams. That is why we are rolling out professional practices across all our sites that promote the long-term health and well-being of our employees:

- We encourage recognition through a culture of positive feedback
- We prevent psychosocial risks by raising awareness among all managers and employees
- We condemn all forms of intimidation and harassment, whether moral or sexual
- We carry out health awareness and prevention initiatives.

HEALTH AND SAFETY

GROUPE ATLANTIC considers safety to be a major concern for its employees, customers, and suppliers. We consider the mental and physical health and safety of our employees to be essential. All employees have a responsibility for their own safety and that of others.

GROUPE ATLANTIC is committed to ensuring the physical and mental well-being of its employees in the workplace and to fostering a culture of safety amongst all of its employees by guaranteeing them safe and healthy workplaces, from the moment they join the company and throughout their career:

- Every employee is informed and trained in safety rules
 - Every employee has a duty to comply with safety rules and to report any breaches
 - Every employee has a duty to comply with the safety procedures and rules of their working environment.
- Every employee has a duty to use the personal or collective protective equipment related to their activity and provided at their site or in their sector
 - Throughout GROUPE ATLANTIC, we encourage the development of a culture of health & safety at work, involving employees and their representatives where applicable
 - All incidents or accidents are analyzed and corrective measures are taken in a quest for continuous improvement and risk prevention.



SOCIAL DIALOGUE/

GROUPE ATLANTIC encourages social dialogue by respecting freedom of association and promoting social dialogue, both individually and collectively.

Dialogue is an integral part of the Group's values, with exchange and transparency fostering trust.

On an individual level, each employee has the opportunity to express themselves through interviews and satisfaction surveys (Group or scope).

Collectively, we respect everyone's right to join workers' organizations that defend their interests.

We promote and are committed to conducting voluntary collective bargaining in accordance with the rules and legal agreements of each country, in order to build a solid and constructive social dialogue.

SKILLS DEVELOPMENT

GROUPE ATLANTIC firmly believes that skills development is a strategic lever for supporting sustainable performance, while empowering each employee to take charge of their own development.

We promote initiatives aimed at:

- Ensuring that employees' skills match the Group's current and future needs throughout their careers, and providing equal access to training for all
- Supporting the Group's and sites' strategy through cross-functional and/or business-specific measures
- Encouraging internal mobility and sustainable employability for all
- Promoting a culture of continuous learning and knowledge sharing
- Promoting diversity, inclusion, and professional equality in development paths.

The effectiveness of the actions taken is regularly assessed in order to better adapt them.

Several development tools and mechanisms are available:

- Integration programs
- Interviews
- Cross-functional and local training opportunities
- Group digital platform
- Professional academies
- Development programs
- Mobility and assignments
- Communities and peer networks

DIVERSITY, EQUALITY AND INCLUSION

GROUPE ATLANTIC firmly believes that performance is based on the human wealth of its teams, which come from a wide variety of cultures, backgrounds, and professions. Diversity is considered a driver of innovation and attractiveness.

That is why we are committed to:

- Ensuring a fair, inclusive, and respectful working environment across all our entities
- Integrating diversity & inclusion into our HR, managerial, and industrial practices
- Encouraging freedom to be oneself and mutual respect throughout the Group.

We pay particular attention to the following areas:

GENDER DIVERSITY AND PROFESSIONAL EQUALITY

- Aiming for balanced representation at all levels, including in technical and industrial professions
- Ensuring equal treatment and pay for women and men
- Promoting equal access to positions of responsibility.

INCLUSION OF PEOPLE WITH DISABILITIES

- Raising awareness among all employees about the different realities of disability and promote the recruitment, integration, and retention of people with disabilities.

INTERGENERATIONAL DIVERSITY

- Promoting the complementarity of generations and the transfer of knowledge by ensuring equal treatment for all ages
- Maintaining the employability of experienced employees.

CULTURAL DIVERSITY AND INCLUSION OF IDENTITIES

- Valuing the diversity of origins, cultures, and backgrounds in all our subsidiaries
- Promoting a work environment that respects all identities and orientations.



BUSINESS ETHICS

ANTI-CORRUPTION

GROUPE ATLANTIC is committed to combating all forms of corruption in its relations with its private and public partners. Ethics and integrity are at the heart of the Group's corporate culture.

The principles to be observed are formalized in the **Anti-Corruption Charter** in order to:

- Ensure compliance with all French, European, and international laws and regulations applicable to us, particularly with regard to the prevention and fight against corruption
- Enable employees to familiarize themselves with situations that may constitute corruption and remind them of the appropriate behaviour to adopt in such situations.

Everyone is required to adhere to the fundamental principles of integrity and professional ethics and to behave in an irreproachable manner.

In addition, dedicated charters on **Gifts and Invitations** and **Conflict of Interest Prevention** detail best practices.

RESPONSIBLE PURCHASING

GROUPE ATLANTIC's purchasing policy is based on long-term relationships of trust and partnership with its suppliers.

The sustainability of these relationships depends on operational excellence on a daily basis (competitiveness, product and delivery quality, customer service, etc.), but also on taking into account the long-term acceptability and sustainability of the activities of all stakeholders.

The Responsible Purchasing Charter formalizes GROUPE ATLANTIC's commitments and those expected of its suppliers in terms of the environment, health and safety, ethics, and compliance with labour laws.

WHISTLEBLOWING PROCEDURE

GROUPE ATLANTIC firmly believes in the importance of reporting violations of the law, regulations, standards, and principles defined by GROUPE ATLANTIC, as well as breaches and unethical behaviour, in order to ensure a high level of integrity in a transparent and confidential manner.

That is why we have established an alert procedure outlining the various channels available to all employees for reporting violations of the law, regulations, internal standards and principles, as well as unethical behaviour (e.g., fraud, corruption, harassment, environmental violations, etc.).

As part of this alert procedure, the Group has deployed the "GA ALERT" online platform, which allows stakeholders (employees, suppliers, customers, etc.) to make a report while remaining anonymous.

This whistleblowing procedure is an additional channel that does not replace other means of reporting, such as communicating with a manager or HR.

A detailed description is available in the document: **Procedure - Whistleblowing system.**





