



BUSINESS ETHICS CHARTER

JUNE 2026



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PRESENTATION

For over 60 years, COMEPA has established itself as a key player in the development of cutting-edge technological solutions. Drawing on recognised expertise in highly demanding sectors such as medical, aerospace and rail, the company combines innovation, rigour and commitment to address the most complex technical challenges.

With its headquarters in Tremblay-en-France (France), COMEPA maintains a strong local presence while projecting itself onto the international stage. Its independence, human-scale structure and collaborative approach make it a trusted partner for its clients and employees.

Guided by its core values – Ingenuity, Support, Rigour and Commitment – COMEPA pursues its mission to improve the performance of its products in the service of its clients, while integrating responsible and sustainable practices across all its activities.

BUSINESS ETHICS AT COMEPA

In keeping with its commitments, this Business Ethics Charter supplements and clarifies the principles defined in the company's ethics charter (MGT-ENR072-1).

In the context of the development and evolution of its activities, COMEPA pays particular attention to issues related to business ethics. The company is aware of the risks that may arise in its commercial relationships and remains fully committed to ensuring the integrity, transparency and fairness of its practices.

TOPICS COVERED

COMEPA formally prohibits any form of unfair, fraudulent or unethical practice in the conduct of its activities and in its relationships with its stakeholders.

This includes in particular:

- corruption
- bribery
- fraud
- favouritism
- conflicts of interest

COMEPA maintains constant vigilance on these matters and continues its prevention efforts to ensure responsible practices that are consistent with its commitments.

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CURRENT COMMITMENTS

Commercial relationships are systematically monitored and evaluated with the active involvement of management, in order to prevent any unfair or fraudulent practice, both with suppliers and clients.

This direct involvement ensures that ethical practices are maintained throughout the value chain, from product sourcing through to commercialisation.

COMEPA also monitors applicable regulations and takes action to meet its obligations, both in terms of product compliance and fair practices. This approach aims to guarantee consumer safety, transparency of practices and compliance with regulatory requirements.

Finally, COMEPA promotes the development of lasting and balanced relationships, built on trust and shared value creation..

STAKEHOLDERS CONCERNED

This charter applies to all of COMEPA's stakeholders, including clients, suppliers and any other business partners of Comepa.

PERSONS RESPONSIBLE

COMEPA's management is responsible for implementing this charter and ensuring the proper application of ethical commercial practices within the company's activities..

MEASURES IN CASE OF NON-COMPLIANCE

Any behaviour that is unfair, fraudulent or contrary to the principles defined in this charter may result in disciplinary measures or appropriate sanctions, proportionate to the seriousness of the facts observed.

COMMUNICATION

This charter is freely accessible on COMEPA's website and communicated to all employees and relevant stakeholders.

Gilles de Beauvais
CEO

