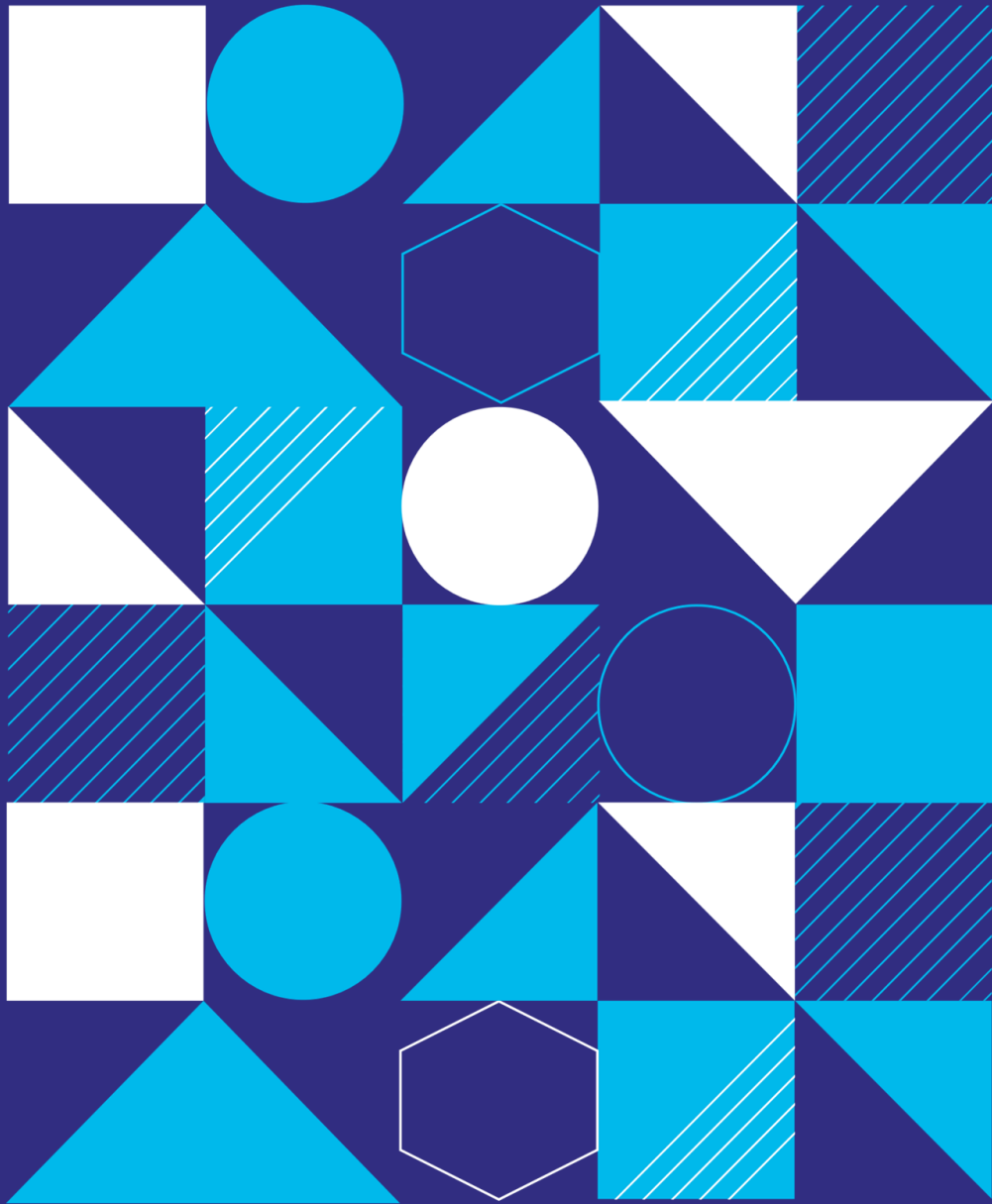


February 2023 version



# Ethic Charter

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# Why do we have an Ethics Charter?

**The Sfp Group Ethics Charter sets out and reiterates the key legal, regulatory and internal frameworks that guide the actions of the group, its managers and its employees on a daily basis.** Beyond being a good governance practice for listed companies, it provides common benchmarks to guide our decisions.

Sfp Group **acts in compliance with applicable national, European and international regulatory frameworks in all circumstances.**

The group conducts its operations in accordance with the common values and principle of industrial responsibility defined in this Ethics Charter.

This Ethics Charter applies to all Sfp Group employees, managers and entities.

The group expects the entities that join it to respect the same principles of this Ethics Charter.

The group has put in place reporting and control systems to ensure compliance with the principles defined in this charter.

## Major international texts

Sfp Group complies with a number of major international texts such as the Universal Declaration of Human Rights and the United Nations Global Compact, as well as with all national and international legislation governing its activities.

In addition, Sfp group follows the sustainable development goals set by the United Nations member states.

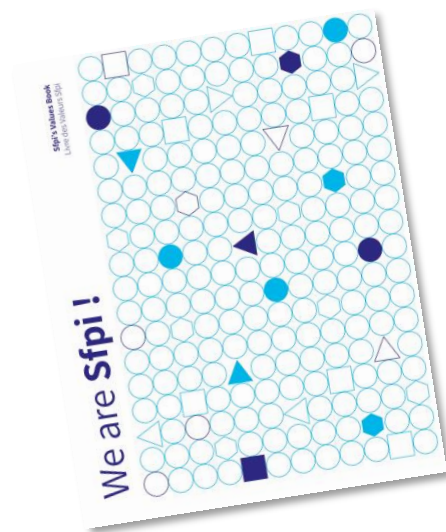
Find the major international texts online:

[Universal Declaration of Human Rights](#)

[United Nations Global Compact](#)

[United Nations Sustainable Development Goals.](#)

# Why do we have an Ethics Charter?



## The founding values

The group has been built around strong values, which shape its culture and guide its actions.

As employees and leaders, three values form a common base to which we should freely adhere, without these being exhaustive:

- **Consistency:** keeping the commitments that we have undertaken.
- **Transparency and integrity:** so that trust can cement the teams.
- **Loyalty:** for the benefit of the company and its stakeholders.

Around this common base, **the group advocates a principle of managerial autonomy and individual freedom** that is consistent with local issues and the professional qualities of each person.

The group encourages managers to discuss, identify and share values within their teams to support and guarantee collective performance.

### **The Values Book, a collective medium for sharing the values of the Sfp Group teams**

The group, its directors and managers believe in the importance of values in order to achieve its objectives, live collectively and overcome crises and difficulties.

In the *Values Book*, various leaders, managers and talents answer this deceptively simple question: what are your professional or managerial values? This Values Book highlights living values and puts them to the test in concrete cases.

As a new manager, you will be given this *Values Book*. You can also find it online in the appendices.

# Ethics in practice at Sfpfi Group: our industrial responsibility

Sfpfi Group promotes industrial responsibility among its employees as an anchorage point between our values and our actions.

**Industrial responsibility** is in the DNA of the group's founders and managers and is **defined as a behaviour that enables a company and its employees to be efficient while guaranteeing the protection of people, property and the environment.**

Industrial responsibility aims to create sustainable value for all the group's stakeholders. The group is therefore promoting this principle of industrial responsibility in all its activities and is initiating transformational work within its subsidiaries around 4 dimensions:

- **commercial responsibility**, putting customers at the heart of the group's practices.
- **environmental responsibility**, producing better by consuming less while promoting innovation.
- **financial responsibility**, creating sustainable value for all our stakeholders.
- **managerial responsibility**, enhancing the know-how of teams and managers.

## **A transformation plan to become a leader in industrial responsibility**

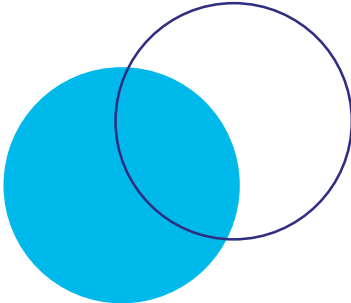
Since 2020, the group has structured and launched an **approach to transform its activities around the 4 pillars of industrial responsibility**. Our ambition: to demonstrate our position as a leader in industrial responsibility.

This transformation process, in which the group's managers and employees are involved, makes it possible to explore and define common frameworks, which are then implemented in the daily practice of activities. Regular meetings are held to support the development of this plan.

This approach has already resulted in the implementation of carbon audits, the introduction of satisfaction or quality indicators, the deployment of managerial standards and training, and the consolidation of common financial practices, to name but a few examples.

Find all the documents related to the transformation plan on the online shared space.

[http://gstrep.groupe-sfpfi.com/FinancialPrincipalData/layouts/15/start.aspx#/Mthode\\_et\\_principe\\_comptable](http://gstrep.groupe-sfpfi.com/FinancialPrincipalData/layouts/15/start.aspx#/Mthode_et_principe_comptable)



# 01.

Commercial responsibility -  
Business ethics

# Commercial responsibility - business ethics

## Acting ethically with all stakeholders in our business activities

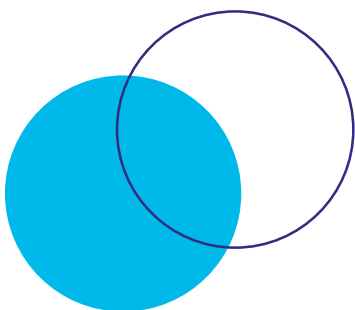
Sfpi Group is committed to **acting ethically, fairly and professionally** in its dealings with all market participants, whether with public authorities, our partners (customers, suppliers, subcontractors) or our competitors.

## Anti-corruption policy

Sfpi Group adheres to the Middlednext Anti-Bribery Code of Conduct. This Code is an integral part of the company's internal regulations. Sfpi Group does not engage in bribery or influence peddling as part of its business practices.

## Points to remember:

- **Bribery** is behaviour whereby a person offers, requests or accepts, directly or through intermediaries, a gift, offer or promise, presents or benefits of any kind with a view to performing, delaying or omitting to perform an act directly or indirectly related to his or her duties in order to obtain or retain a commercial or financial benefit or to influence a decision.
- **Influence peddling** refers to the fact that a person uses their position or influence, real or assumed, to influence a decision to be made by a third party. It involves three parties: the beneficiary (the one who provides benefits or gifts), the intermediary (the one who uses the credit they have because of their position) and the target person who has the decision-making power (public authority or administration etc.).
- **Corruption can take many forms under the guise of common business practices.** The greatest care and attention is requested with regard to invitations, gifts, sponsorships, donations and sponsoring.
- Beyond the activities of its subsidiaries, **the group has an obligation to monitor third parties with whom it has relations with regard to corruption issues** (suppliers, service providers, companies to be acquired, customers, etc.).



# Commercial responsibility - business ethics

## Ensuring fair competition

The Group continues to operate within a framework of fair competition.

**Therefore, collaboration with competitors on certain issues is prohibited.** Here is a list of them:

- sales prices,
- the level of purchase prices and their breakdown,
- cost prices,
- production,
- marketing,
- product development,
- the result of market research,
- sharing of markets, tenders, contracts etc.
- confidential information in general.

## Business secrets

Group employees must not engage in illegal or improper actions to obtain business or technology secrets from a competitor, supplier or subcontractor.

In the same vein, employees must not encourage the staff of these competitors, suppliers or subcontractors to disclose confidential information to them.

## Business travel

When travelling abroad on business, employees undertake to comply with the laws and regulations of the country they are visiting.



# 02. Environmental responsibility – Environmental ethics



# Environmental responsibility - environmental ethics

## Taking a sustainable approach to environmental preservation

Sfpi Group is aware of the environmental impacts of its activities and conducts all its operations in compliance with the regulations in force. In addition to these regulations, the group encourages its subsidiaries, managers and employees to take action to reduce their carbon footprint, energy consumption and waste production.

The group continues its technological development by systematically including **solutions with added environmental value.**

The group **aims to achieve the highest standards in terms of environment,** preservation of natural resources, energy consumption and waste management.

Together with its teams, the group is implementing a transformation plan within all its subsidiaries with a view to improving its environmental performance.

As part of its reporting obligations, the group publishes an annual Extra-Financial Performance Statement, which includes the carbon footprint of its companies.

The Group's management must comply with and implement the necessary actions to meet Sfpi Group's environmental reporting requirements.





# 03. Financial liability - insider trading

# Financial liability – insider trading

Sfpi Group and its subsidiaries are **exposed to a range of French and international regulations as a result of its listed status and size.**

**As an issuer** Sfpi Group **is required to establish a list of its insiders**, i.e. “a list of all persons who have access to inside information. These people work for the Group under an employment contract or otherwise perform tasks that give them access to inside information, such as consultants, accountants or credit rating agencies”.

As a manager, employee or "insider", **you should be aware of the main elements of these regulations, which are subject to heavy sanctions.**

## Points to remember:

- Insider information is information that would be likely to have a significant impact on the price of the shares if it were made public (e.g. pre-release sales or earnings).

- As a holder of insider information, you must refrain from using it for your own account or the account of others.

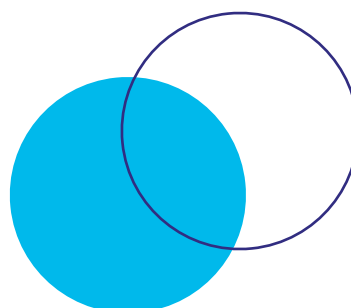
- As holders of insider information, **you must not trade in securities during "negative window" periods:** 30 days before the publication of an interim or annual financial report (annual or half-yearly accounts) and 15 days before the publication of other financial releases (turnover, interim results etc.).

- The publication dates are available on the Group's website.

- Outside these negative windows, any transactions in the group's securities involving employees will be reported to the Autorité des Marchés Financiers.

- Employees involved in a sale or acquisition must refrain from trading directly or indirectly in Sfpi Group securities or those of the counterparty to the proposed transaction because of their insider status.

- The sanctions are described in the Monetary and Financial Code. Sanctions may be a prison sentence of up to 5 years and 100 million euro fine, or ten times the amount of the benefit derived from the offence.





# 04. Managerial responsibility – social ethics

# Managerial responsibility – social ethics

## **A. Fundamental rights, inclusion and diversity**

Sfpi Group respects and upholds all principles of fundamental labour rights:

- **effective abolition of child labour,**
- **elimination of all forms of forced and compulsory labour,**
- **elimination of all forms of discrimination in employment and occupation,**
- **respect for freedom of association and effective recognition of the right to collective bargaining.**

In addition, the group promotes the diversity of profiles and backgrounds. The group is committed to ensuring that all employees are able to enjoy their rights regardless of skin colour, gender, religion, political beliefs, national or social origin, age, disability, trade union membership and sexual orientation or gender identity.

All forms of discrimination for the above reasons are prohibited, whether in recruitment, remuneration, working hours and rest or paid leave, protection of job security, job allocation, evaluation, training, job opportunities and job allocation.

Gender equality is an integral part of our group's culture. The Group makes equal opportunities for women and men a central component of its human resources policy, as part of an inclusive culture and pays particular attention to the development of women's careers.

## **B. Combating all forms of harassment**

The group expects every employee to be understanding of the teams around them. If an employee witnesses or is the victim of a situation that they consider degrading or not in line with the principles listed above, they can and should inform the Human Resources Department.

Managers are expected to act with respect and integrity with their teams.

# Managerial responsibility – social ethics

Furthermore, Sfpí Group does not tolerate any form of harassment, humiliation or intimidation, whether sexual, physical or psychological. We remind you that any behaviour that undermines the dignity of a person and is intended to create an intimidating, oppressive, degrading, sexist or humiliating environment is contrary to the group's internal regulations and will be subject to sanctions.

Any employee who believes that they have been the victim of such a practice should report it to their supervisor directly or, failing that, by using the means of alert made available by Sfpí Group.

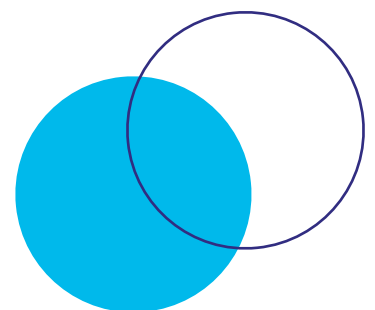
## **C. Neutrality of opinion**

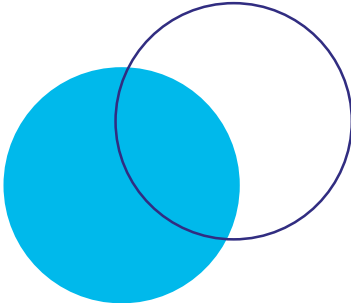
Sfpí group expects its employees to be neutral in their opinions in the performance of their duties, with the exception of social or trade union opinions expressed within the defined framework.

Sfpí Group does not contribute to the funding of political parties, religious or sectarian organisations in any form.

Sfpí Group employees may engage in political activities if they are conducted outside working hours and places.

Each employee must refrain from using the assets, image or reputation of Sfpí Group, particularly on social networks, for non-business activities.






**05.**

Warning and control systems





# Warning and control systems

If you have questions about the application of a provision, or witness or are aware of a deviation from the principles set out in the Ethics Charter, **the first step is to report these questions or elements to your line manager or to the Group's General Secretariat.**

Sfpi Group has also set up a **whistleblower system** to ensure that these rules are properly applied. This system allows people to anonymously report inappropriate or worrying behaviour that could put the group or its employees at risk.

It can be accessed at: <https://sfpigroup.integrityline.com/frontpage>

The detailed procedure is available in the annex.

# 06.

Access to annexes and  
contacts



## Access to annexes and contacts

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### a. Legal department

Mr Pierre-Paul FINI, Legal Director: [ppfini@groupefpi.com](mailto:ppfini@groupefpi.com)

### b. Human Resources department

Ms Stéphanie PONCELET, Director of Human Resources: [stephanie.poncelet@groupefpi.com](mailto:stephanie.poncelet@groupefpi.com)

### c. Finance department

Mr Nicolas LOYAU, Finance department: [nicolas.loyau@groupefpi.com](mailto:nicolas.loyau@groupefpi.com)

### d. IT and digital policy department

Thierry GUENIN, IT Manager: [thierry.guenin@groupefpi.com](mailto:thierry.guenin@groupefpi.com)

### e. CSR

Sophie MOREL: General Secretary Sfpi Group: [sophie.morel@groupefpi.com](mailto:sophie.morel@groupefpi.com)

### Where can I find the supporting documents?

All related documents are available on the Share Point "Code of Conduct", accessible via this link: [http://gstrep.groupefpi.com/FinancialPrincipalData/\\_layouts/15/start.aspx#/](http://gstrep.groupefpi.com/FinancialPrincipalData/_layouts/15/start.aspx#/)