

Code of Conduct

THE CHARTER OF OUR
PROFESSIONAL ETHICS AND INTEGRITY

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MESSAGE FROM THE CEO

Dear colleagues and partners,

As the SFA Group continues to evolve and grow, it is important that our governing documents reflect our current values and aspirations. I am therefore pleased to introduce our new Code of Conduct, which officially replaces our previous Ethics Charter. More than just a set of rules, this document reflects our commitment to Inventiveness, Simplicity, Comfort and Care, and guides us in making ethical decisions that impact our customers, partners and the communities we serve.

Our commitment to Inventiveness challenges us to find creative and ethical solutions to challenges. Simplicity in our actions and communications ensures clarity and effectiveness, while Comfort and Care reminds us of the importance of considering the wellbeing of individuals and communities in our decisions. These core values are not just words - they are principles that drive every aspect of our business.

As your CEO, I am fully committed to these values and to leading by example in upholding the high standards set out in our new Code of Conduct. I expect every member of our team, regardless of position or seniority, to embrace and apply these principles in their daily work.

This Code of Conduct commits us to operate transparently and fairly, ensuring that we all act



with integrity and respect for each other and our stakeholders. It is built on the principles of our previous Ethics Charter but is tailored to better meet our current needs and future ambitions.

I encourage each of you to actively engage with this new Code, to familiarize yourself with its contents, to ask questions, to seek clarification and to report any concerns about potential breaches. Your proactive involvement is critical to our ability to uphold these standards and ensure that our actions consistently reflect our values.

Together, let's continue to build a culture of integrity and excellence. Our shared commitment to these principles will drive the SFA Group's continued success and maintain our positive reputation.

Arnaud CORBIER
CEO, SFA Group



INTRODUCTION

▲ PURPOSE OF THE CODE OF CONDUCT

The Code of Conduct (hereinafter referred to as "the Code") is designed to serve as a guiding framework for decision-making and daily operations at SFA Group. It outlines our commitment to ethical behavior, integrity, and respect for all individuals involved in our activities. Here's how the Code supports our mission:

- 💧 **Providing clarity and direction:** It sets clear expectations for ethical behavior, empowering employees to navigate complex situations and make decisions that align with our corporate values.
- 💧 **Building trust:** By consistently upholding these ethical standards, we foster trust among all stakeholder groups, which is crucial for building strong, enduring relationships.
- 💧 **Contributing to sustainable growth:** Ethical practices enhance reputation, attract and retain top talent, and help secure valuable partnerships, thereby contributing to the company's long-term success.

While this Code covers fundamental principles, it is not exhaustive. There will be situations not explicitly addressed within these pages. In such cases, we rely on you to apply sound judgment and uphold both the spirit and the letter of the Code.

The Code is dynamic and will evolve to meet the changing needs of our group and comply with local legal and regulatory requirements. Remember, this Code sets forth ethical guidelines but does not supersede existing laws, regulations, or other company policies that govern our operations.

SCOPE AND APPLICABILITY

▲ WHO IS AFFECTED BY THIS CODE?

The Code applies to everyone involved with SFA Group's global operations and supply chain, ensuring a consistent standard of ethical behavior across all levels and areas of our business:

- 💧 **Employees:** All employees, whether permanent, temporary, or contracted, and regardless of their position, level, department, or location, are required to adhere to this Code
- 💧 **Business Partners and Suppliers:** We expect our partners and suppliers to commit to the ethical standards set forth in this Code. Their collaboration with us must be conducted ethically and lawfully, as their actions significantly impact our operations and reputation.
- 💧 **Other Stakeholders:** This includes customers, communities and investors. We are committed to engaging with all our stakeholders with the highest level of integrity and respect.

▲ LEGAL COMPLIANCE

SFA Group is dedicated to complying with applicable laws and regulations in each country where we operate. This Code enhances our legal compliance by providing an ethical framework that extends beyond statutory requirements.

▲ IMPLEMENTATION AND OVERSIGHT

The enforcement of this Code is the responsibility of our leadership at all levels. Leaders ensure its implementation and are empowered to approve necessary exceptions. All employees must actively promote and embody the principles of this Code in their daily activities.

▲ LANGUAGE OF THE CODE

This document is available in multiple languages. It is important to understand that in the event of any conflict or inconsistency between translations, the French (FR) and English (EN) versions will prevail and are the only versions considered binding.



OUR VALUES

As a global industrial leader in designing and manufacturing solutions for domestic and professional uses wherever water flows, our core values are not just words on paper; they represent our commitment to responsible business practices, societal well-being, and environmental stewardship.

Growing together

Our ambition is to foster growth not only within our company but also alongside our employees, partners, suppliers, and the communities we touch. We are committed to continuous development and improvement. By pooling our diverse skills and working collaboratively, we aim to tackle today's challenges and prepare for tomorrow's opportunities. This collective approach nurtures a supportive environment, crucial for fostering innovation and achieving our goals.

Who we are, who we aim to be and how we aim to make a positive impact in the world



INVENTIVENESS: we create smart solutions

Our inventiveness is the key to our success. We creatively solve complex sanitation challenges and advocate for the development of novel solutions. With «You can. Anywhere. » as our guiding principle, we encourage each other to expand our skills and remain open to growth and continuous improvement. We are receptive to new ideas, engage in research, take risks to find innovative problem-solving approaches, and share our knowledge and skills to grow collectively.



SIMPLICITY: we keep it simple

We emphasize simplicity in everything we do. Our goal is to develop solutions that effectively address complex challenges while being easy to understand and apply. We know that clarity and straightforwardness are key. Simplicity also requires clear communication. We believe in open and direct communication where all parties can easily understand the information being exchanged.



COMFORT: we bring comfort to people's lives

Our focus is on high-quality, reliable, and long-lasting products that make a difference in people's lives. We are committed to maintaining the integrity of our products and ensuring the comfort and safety of our customers and employees. We follow through on our commitments and communicate transparently with our stakeholders.



CARE: we care for people and planet

Our responsibility extends beyond our organization. We advocate for the well-being and safety of our employees and cultivate an inclusive environment that values diversity. We are dedicated to seeking and acting upon feedback for continuous improvement. We consider the social and environmental implications in everything we do and work towards making society and the environment a better place.



GUIDELINES

Compliance with Laws and Global Standards

SFA Group is committed to full compliance with local and international laws and principles that guide our operations globally. As participants of the United Nations Global Compact, we uphold the ten principles related to human rights, labor, environment, and anti-corruption. Additionally, we are actively working towards aligning our practices with the Corporate Sustainability Reporting Directive (CSRD), which enhances transparency in sustainability matters.

▲ WORKPLACE ENVIRONMENT

We strive to create a workplace where dignity and mutual respect are upheld for everyone, as these values are fundamental to collaboration and well-being at SFA Group. Here are our key expectations for all employees:

Respectful Communication

- 💧 Show respect for colleagues' opinions, backgrounds, and contributions, valuing diversity within our team.
- 💧 Encourage open and honest communication, ensuring it is always delivered in a respectful and constructive manner.
- 💧 Uphold the privacy and confidentiality of all individuals associated with our operations.
- 💧 Refrain from engaging in any form of insults, aggression, humiliating remarks, violence, or behaviors likely to cause harm or discomfort to others. Such conduct not only undermines our culture but may have legal implications.

Civility

- 💧 Demonstrate courtesy, civility, and professionalism always, contributing to a harmonious workplace environment.
- 💧 Maintain a professional demeanor and consider the impact of your behavior on others.

Degrading Treatment: Humiliating act and remarks, insults, offensive jokes, bullying, or any other conduct that undermines a person's dignity.

Harassment: Unwelcome conduct that creates a hostile work environment. This includes sexual and psychological harassment, for example offensive gestures, verbal abuse, threats, intimidation, stalking, or unwelcome sexual advances.

Abuse: Physical, verbal, or emotional mistreatment, including violence, threats of violence, and aggressive behavior.



▲ NON-DISCRIMINATION AND EQUAL OPPORTUNITY

At SFA Group, we are committed to fostering a workplace environment where equality and fairness are not just upheld but are core to our operations. We strive to create an inclusive environment that is free from discrimination, upholding these values in every aspect of our activities.

Commitment and practices

- 💧 **Recruitment and promotion:** Our hiring and promotion practices are based solely on professional criteria such as qualifications, skills, and experience. We ensure that decisions are made without regard to personal characteristics unrelated to job performance.
- 💧 **Compensation and benefits:** We offer competitive and equitable compensation packages that reflect each employee's job performance and qualifications, guaranteeing fairness across our organization.
- 💧 **Training and development:** We provide all employees with equal opportunities for professional growth. Our training programs are designed to enhance skills and support career advancement within the company.

Prohibited Conduct

- ☒ Discriminatory behavior, remarks, or actions based on race, ethnicity, national origin, religion, sex, sexual orientation, gender identity, age, disability, social origin, marital status, trade union activity, or any other protected characteristic are strictly prohibited.
- ☒ Harassment, degrading treatment, incivility, and any abuse towards colleagues, clients, suppliers, service providers, or others in professional relationships are unacceptable.
- ☒ Any actions or language that undermine the principle of equality are not tolerated.

Preventive measures

SFA Group takes proactive steps to prevent discrimination and harassment in the workplace. This includes:

- 💧 Clear communication of our non-discrimination policies
- 💧 Training programs to promote inclusive behavior.
- 💧 A transparent reporting system for incidents, ensuring all concerns are addressed promptly and effectively.



▲ DIVERSITY AND INCLUSION

At SFA Group, we believe that a diverse workforce is a cornerstone of strength and innovation. We are committed to fostering a work environment that celebrates diversity and promotes inclusion at all levels of our organization.

Our Commitment

- 💧 **Promote Diversity:** We actively seek to recruit, develop, and retain the most talented individuals from a diverse pool of candidates. Our goal is to harness the varied perspectives and skills that come with a broad and diverse workforce.
- 💧 **Foster Inclusion:** We are dedicated to creating a culture where every employee feels valued, heard, and empowered to contribute fully, regardless of their background, identity, or beliefs.
- 💧 **Inclusive Policies and Practices:** Our policies and practices are designed to remove barriers and promote equal opportunities for all employees. This commitment ensures that everyone has the resources and support necessary to thrive.

Diversity and inclusion are more than just ideals; they are critical drivers of creativity and business success. By embracing a multitude of perspectives, we enhance our ability to understand and meet the diverse needs of our customer base, leading to a more dynamic and creative work environment.

Let us work together to create a workplace where everyone, regardless of background, feels fully included in the SFA Group.

▲ SAFE AND HEALTHY WORKING CONDITIONS

At SFA Group, the safety and health of our employees are paramount. We are committed to maintaining a workplace that prioritizes well-being, accident prevention, and the mitigation of occupational diseases.

Maintaining a Safe Workplace

- 💧 **Compliance:** We adhere to compliance with applicable health and safety regulations and standards. This ensures a baseline level of safety across all our operations.
- 💧 **Safety Instructions:** Clear and comprehensive safety instructions are established to minimize risks and promote safe work practices.
- 💧 **Continuous Improvement:** We regularly update and improve our safety measures through risk assessments, safety inspections, and the implementation of new protocols as necessary.
- 💧 **Training:** Employees receive ongoing safety training to ensure they are fully equipped to manage their personal safety and that of their colleagues.
- 💧 **Ongoing Communication:** Safety requirements are regularly communicated through memos and safety meetings, ensuring all employees are informed of current standards.
- 💧 **Employee Participation:** Active employee involvement is crucial. Employees must adhere to safety instructions, including the use of personal protective equipment (PPE) and compliance with safe work procedures.

- 💧 **Open Communication:** We encourage the reporting of any safety incidents or unsafe conditions immediately to ensure swift action and resolution.

▲ FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The SFA Group respects the fundamental rights of employees to freedom of association and collective bargaining, recognizing these rights as essential for a positive workplace environment and fair treatment.

Freedom of Association

Employees are free to join or form trade unions or other representative organizations without fear of discrimination, harassment, retaliation, or interference. We safeguard against any retaliation for participating in or refraining from union activities.

Collective Bargaining

- 💧 We recognize the right of employees to engage in collective bargaining through their chosen representatives concerning wages, benefits, and working conditions.
- 💧 We commit to good faith negotiations and comply with all relevant laws governing collective bargaining, providing necessary information to employee representatives during discussions.

Prohibited Actions

- ☒ **Anti-Union Practices:**
Any form of anti-union discrimination or interference is strictly prohibited.
- ☒ **Interference with Union Activities:**
Managers and supervisors are expressly forbidden from restraining, coercing, or interfering with union activities.

The SFA Group is dedicated to fostering an environment of open and constructive communication between management and employee representatives, ensuring all voices are heard and respected.



▲ PROHIBITION OF FORCED AND CHILD LABOUR

Forced Labour

Forced labour is defined as labour performed against one's will and under threat of punishment of some kind. This situation occurs when individuals are forced to work through violence, intimidation, or other subtle means such as handling debts, withholding identity documents or threatening to report them to migration authorities.

Forced Labour Convention (Nº. 29)

The SFA Group strictly prohibits any form of forced labour across all operations and throughout our supply chain.

This prohibition includes all forms of human trafficking, slavery, and any other kind of labor that is not voluntary. We ensure that all employment within our group is consensual and that employees are free to terminate their employment in accordance with relevant laws and without undue restrictions.

Supply Chain Diligence

We require all suppliers and business partners to adhere strictly to our standards against forced and child labour. Our procurement processes include requiring suppliers to adhere to our **SFA Group Supplier Code of Conduct** and due diligence to ensure that suppliers comply with these prohibitions.

▲ DATA PRIVACY AND USE OF IT

Privacy Preservation

The SFA Group commits to protecting personal data against unauthorized access, misuse, or breach. We consider the privacy of employee records, customer details, and sensitive financial information paramount.

Employee Data Protection

We handle all employee personal data with the highest degree of care and transparency. Consent is obtained where necessary, ensuring all data handling practices comply with applicable data protection laws.

Customer Trust

We safeguard customer data with utmost responsibility. Ensuring the confidentiality and security of our customers' information is fundamental to maintaining their trust.

Child Labour

Child labour is defined as work that deprives children of their childhood, potential and dignity, and harms their physical and mental development. It encompasses all activities that:

- Are mentally, physically, socially, or morally dangerous and harmful to children.
- Interfere with their schooling, depriving them of the opportunity to go to school, forcing them to leave school early, or forcing them to combine school attendance with excessively long and heavy work.
- Include specific forms such as slavery, prostitution, hazardous work, or excessive work.

International Labour Organization (ILO)

We do not tolerate any form of child labour and adhere strictly to the minimum age provisions set by law for employment. Young workers are provided with suitable working conditions that do not compromise their health, education, or development.



IT and Communication Systems Usage

All employees must use the company's information and communication systems, including computers, digital tools and networks, in accordance with the "Charter for the use of IT resources and digital tools". This includes, but is not limited to:

- 💧 Only accessing and using data for authorized purposes.
- 💧 Ensuring all personal data is kept secure and confidential.
- 💧 Avoiding any unauthorized data collection, storage, use, or disclosure.

▲ POLITICAL, PHILOSOPHICAL, AND RELIGIOUS BELIEFS

To ensure a harmonious and productive work environment, SFA Group respects the diverse political, philosophical, and religious beliefs of its employees. We encourage all employees to maintain a professional demeanor and express their beliefs in a manner that is respectful and considerate of others.

Signs and Symbols

- 💧 Employees are encouraged to dress in a manner that is professional and appropriate for the workplace. While we respect the right of individuals to express their beliefs, visible displays of political, philosophical, or religious symbols should be balanced with the need to maintain a neutral and inclusive environment. Reasonable accommodations for religious practices will be made in accordance with applicable laws.

Controversial Discussions

- 💧 SFA Group promotes respectful dialogue and the exchange of ideas. Employees are encouraged to engage in conversations that are considerate and inclusive. However, discussions that could be divisive or lead to conflict should be approached with caution and sensitivity. The goal is to foster an environment where all employees feel respected and valued.

These principles apply to all employees, as well as suppliers, service providers, and buyers when they are interacting with or representing our company. We advocate for a workplace that respects individual beliefs and values, ensuring it remains free from bias, discrimination, or harassment.

▲ PROFESSIONAL APPEARANCE

At SFA Group, a professional appearance is essential. It reflects our company image to clients and colleagues and demonstrates respect for our business and each other.

- 💧 **Appropriate Attire:** Employees are expected to dress in a way that is compatible with the activities they carry out and the environment in which they work, or for special events organized in a professional context (conferences, parties, etc.)..
- 💧 **Safety:** Safety considerations must inform the choice of clothing, especially for those in operational environments where protective gear is required. The company recognizes the diversity of individual expressions and strives to maintain a flexible dress code to accommodate such differences, provided that such accommodations do not compromise the intent of this policy.



▲ ENVIRONMENTAL RESPONSIBILITY

Sustainable practices are crucial for ensuring the long-term viability of our planet and prosperity for future generations. SFA Group is committed to implementing and promoting sustainable practices that minimize our ecological footprint and foster a harmonious balance with nature.

Key areas of focus:

- 💧 **Water Stewardship:** We limit water consumption in our products and manufacturing processes, respecting water as an essential global resource.
- 💧 **Resource Efficiency and Conservation:** We strive to optimize the use of materials and energy across all operations.
- 💧 **Waste Management and Reduction:** Strategies such as waste reduction at the source, recycling, and responsible disposal are integral to our operations.
- 💧 **Pollution Prevention:** We aim to eliminate or reduce the release of harmful substances into the environment through continuous monitoring and improvement of our processes, safeguarding the air, water, and soil for future generations.
- 💧 **Climate Change Mitigation:** Recognizing the global challenge of climate change, we are committed to reducing greenhouse gas emissions and exploring strategies to reduce our carbon footprint.
- 💧 **Community Engagement:** We maintain open and constructive relations with local communities to foster sustainable development.

The SFA Group is dedicated to refining our practices and embracing new technologies that minimize our environmental impact and support a sustainable future. We ensure our business is conducted in an environmentally responsible manner that respects local regulations and community values.



▲ BUSINESS CONDUCT

Anti-Corruption

SFA Group maintains a **zero-tolerance policy** towards corruption in all business activities, both domestic and international. This applies to interactions with public officials and private sector individuals alike.

Prohibited activities:

- 💧 **Bribery and Extortion:** No employee or affiliate may engage in bribery, extortion, or any form of corrupt behavior. This includes offering, promising, authorizing, giving, or accepting anything of value to improperly influence a business decision. Prohibited items include, but are not limited to, cash, gifts, entertainment, discounts, loans, or favors.
- 💧 **Improper Influence:** It is forbidden to demand, seek, or agree to receive anything of value in exchange for a business decision. Engaging in any form of unlawful influence is strictly prohibited.

Compliance and Monitoring:

The SFA Group conducts regular audits to ensure adherence to and understanding of this anti-corruption policy, thereby safeguarding the integrity of our business operations.

Fair Competition:

SFA Group is committed to promoting and maintaining a competitive environment that is both fair and ethical, believing that such an environment benefits customers and contributes to a healthy competitive landscape.

Key principles:

- 💧 **Customer Focus:** We prioritize the trust of our customers by respecting their rights, safeguarding their interests, and fulfilling only attainable and responsible commitments.
- 💧 **Respectful Competition:** We avoid public or private disparagement of competitors and refrain from obtaining confidential business information through illegal means.
- 💧 **No Unfair Advantages:** We strictly prohibit any activities that could distort the free play of competition. This includes rejecting any form of favoritism, corruption, or practices that risk compromising the fairness of our dealings.
- 💧 **Antitrust Compliance:** When necessary, we will engage with competitors in a manner that complies fully with antitrust regulations.



▲ SUPPLIERS AND PARTNERS

The SFA Group is committed to building long-term sustainable partnerships with our suppliers and partners. These relationships are built on mutual respect, integrity, and shared values that contribute to a sustainable and responsible supply chain.

Expectations for Suppliers and Partners

- 💧 **Human Rights:** Suppliers must respect the local, fundamental human and labour rights in all aspects of their operations. Respecting the dignity and well-being of the communities affected by their operations.
- 💧 **Environmental Responsibility:** Suppliers are expected to commit to environmental sustainability by minimizing their environmental impact during their operations.
- 💧 **Business Integrity:** All business dealings must be conducted transparently and with integrity. This includes a strict prohibiting of any form of corruption and ensuring that all interactions comply with the principles of free competition.

Selection Process

The SFA Group employs a comprehensive selection process for suppliers that goes beyond mere convenience or cost-effectiveness. Our process emphasizes performance, as well as a commitment to ethical and environmental responsibility. This includes:

- 💧 **Pre-qualification questionnaires:** Potential suppliers are asked to demonstrate their commitment to ethical and sustainable practices. Our selection process is conducted with fairness and transparency. Suppliers and partners are evaluated based on objective criteria, ensuring equal opportunity and the best value for the SFA Group.
- 💧 **Audits and assessments:** We may conduct audits or require independent assessments to verify compliance with our supplier code. The suppliers and partners are expected to take corrective actions if discrepancies or violations are found. The SFA Group reserves the right to re-evaluate the partnership with suppliers and partners who fail to meet our ethical and sustainability standards.

Continuous Improvement

We actively promote open communication with our suppliers and partners to encourage ongoing collaboration aimed at achieving higher standards of ethical and sustainable practices throughout our supply chain. This commitment to continuous improvement helps ensure that our supply chain remains aligned with our corporate values and the expectations of our stakeholders.



REPORTING CONCERNS AND WHISTLEBLOWING

Speak Up, We Listen

At SFA Group, we value transparency and accountability. We strongly encourage all employees and stakeholders to report in good faith any suspected violations of this Code, company policies, or the law. We understand that raising concerns can be challenging, but a culture of open communication is essential to identifying and addressing potential issues.

How to Report a Concern or a Violation

We offer multiple channels for reporting concerns, allowing the whistleblower to choose the method that feels most comfortable for him or her. All reports will be taken seriously, investigating, and appropriate action to rectify any issues will be taken.

The infographic is titled "SFA GROUP REPORTING PROCEDURE" and is set against a teal background. It is divided into three main sections: 1. SPEAK UP, 2. WHO CAN I TALK TO?, and 3. I CAN ALSO... In the first section, a central question "Concerned about misconduct?" is surrounded by four examples: "I am worried this gift is too expensive", "I suspect misuse of company assets", "I feel discriminated or harassed", and "I suspect bribes are being paid". A central question mark icon is also present. The second section, "WHO CAN I TALK TO?", lists three options: "If possible, talk to the person involved", "Talk to your manager, your managers manager or HR representative", "Contact your local CSR representative", and "Contact the SFA Group Ethics committee under ethics@sflagroup.com". The third section, "I CAN ALSO...", provides two methods: "Go to https://sflagroup.speakup.report/sflagroup to file a report" and "Use the app «SpeakUp by People Intouch» and scan the QR Code to get started". A QR code is located in the top right corner. A man in a light blue shirt stands in the lower right area. The SFA Group logo is in the bottom right corner.

SFA GROUP REPORTING PROCEDURE

Report it with SpeakUp

1. SPEAK UP

Concerned about misconduct?

- I am worried this gift is too expensive
- I suspect misuse of company assets
- I feel discriminated or harassed
- I suspect bribes are being paid

Is this fraud?

2. WHO CAN I TALK TO?

If possible, talk to the person involved

Talk to your manager, your managers manager or HR representative

Contact your local CSR representative

Contact the SFA Group Ethics committee under ethics@sflagroup.com

3. I CAN ALSO...

Go to <https://sflagroup.speakup.report/sflagroup> to file a report

or

Use the app «SpeakUp by People Intouch» and scan the QR Code to get started

We understand it is not always easy to raise concerns about possible misconduct but we do encourage you to come forward with any concerns and speak up! Any concern will be dealt with appropriately and confidentially.

SFA GROUP
Shaking up water

Process and Follow-up

- Serious Consideration:** All reports received will be taken seriously. Each will be investigated promptly and thoroughly to ensure a comprehensive understanding of the circumstances.
- Corrective Action:** If issues are identified during the investigation, appropriate corrective actions will be taken to address and rectify these issues effectively.



Protection for Whistleblowers

- 💧 **Anonymity:** We guarantee anonymity for all whistleblowers who wish to remain unnamed. Every effort will be made to protect the identity of whistleblowers throughout the investigation process.
- 💧 **Non-Retaliation:** We strictly prohibit any form of retaliation against individuals who report concerns in good faith. We are committed to ensuring that no adverse action will be taken against anyone for making a report.

Disciplinary Actions

Violations of the Code are serious breaches that compromise the integrity and values of our company. Such acts will not be tolerated and may result in internal disciplinary action.

Disciplinary measures

- 💧 **Warning:** A formal written reprimand that serves as an initial caution.
- 💧 **Layoff:** Temporary suspension from work without pay for up to five working days.
- 💧 **Disciplinary transfer:** A change of position within the company as a sanction.
- 💧 **Demotion:** Assignment to a lower-ranking job as a sanction involving a reduction in pay.
- 💧 **Dismissal for misconduct:** Termination of the employment contract with notice.
- 💧 **Dismissal for serious misconduct:** immediate termination of the contract without pays in lieu of notice or dismissal.
- 💧 **Dismissal for gross misconduct:** Immediate termination of the employment contract without pay in lieu of notice, dismissal or paid leave.
- 💧 **Immediate termination of the notice period:** sanction applicable to an employee who commits serious misconduct during the notice period.

Flexible Application of Disciplinary Measures

The listed penalties provide a framework for disciplinary actions but do not bind the employer to a strict order of application. The specific circumstances of each case will guide the application of appropriate disciplinary measures.

Fairness and Transparency

All disciplinary procedures will be conducted fairly and transparently. We ensure that the rights of all parties are respected, and involved employees will have the opportunity to respond to any allegations of misconduct before a final decision is made.



APPLIANCE AND RESOURCES

▲ COMMUNICATION OF THE CODE OF CONDUCT

This Code outlines the ethical principles and expected behaviors for all SFA Group employees. To ensure everyone is aware of its contents and can uphold its standards, the Code will be communicated through the following methods:

- 💧 **Onboarding:** All new employees will be introduced to the Code during their onboarding process. This will include a review of the key principles and expectations outlined in the document.
- 💧 **Internal Communication Platforms:** The Code will be communicated through internal communication channels, such as the intranet, in-house magazine, and physical copies in common areas.
- 💧 **Managerial Responsibility:** Managers will be responsible for discussing the Code with their teams, ensuring that its principles are integrated into daily operations.

The most current version of the Code be accessible to all employees in both electronic and printed formats. It will be translated into all major languages used within the SFA Group to accommodate our diverse workforce.

▲ UPDATES AND REVISION

The Code is a living document. To ensure that our Code remains effective and relevant, it is subject to periodic review and amendment.

The Code will be reviewed by the SFA Group's Board of Directors of SFA at least every two years. This review may be initiated more frequently in response to changes in the law, ethical standards, organizational developments, or the Company's business practices. The review will also consider feedback received from employees, stakeholders, and external consultants.

Upon approval by the SFA Group's Board of Directors, proposed amendments will be presented to the SFA Group's CSR Committee for final review and validation. Once validated, the amendments will be integrated into the existing Code before being addressed and communicated to all employees through internal channels.

The updated Code will be made available to all employees and relevant stakeholders.



CONTACT INFORMATION

For inquiries or further information regarding the Code, employees and stakeholders should contact:

- 💧 **Direct Supervisor or Manager:** Employees are encouraged to discuss questions or concerns with their direct supervisor first for guidance and clarification.
- 💧 **Ethics Committee:** The first contact for external stakeholders and for employees needing further information or having doubts. The Ethics Committee ensures the strict application of this Charter. Submit inquiries by emailing ethics@sfgroup.com.

The Code and related documents can be found on the company website at sfgroup.com.

We are here to assist you and uphold our commitment to integrity and ethical conduct.



RELATED DOCUMENTS

For more detailed information related to this Code, please refer to the following documents:

- ◊ [SFA Group CSR policy](#)
- ◊ [SFA Group Anti-corruption Code of Conduct](#)
- ◊ [SFA Group Whistleblower Procedure](#)
- ◊ [SFA Group Discrimination and Harassment Policy](#)
- ◊ [SFA Group Human Rights and Labour Policy](#)
- ◊ [SFA Group Sustainable Procurement Policy](#)
- ◊ [SFA Group Supplier Code of Conduct](#)
- ◊ [SFA Group Conflict Minerals Policy](#)
- ◊ [SFA Group Health, Safety and Quality of Life at Work Policy](#)



Version	Approbation	Description
V1	07-2017	Creation of the Ethics Charter approved by the Board of Directors
V2	04-11-2022	Integration of the Ethics Committee to replace the CSR Committee
V3	15-05-2024	<p>Replacement of the Ethics Charter by the Code of Conduct: the changes provide more detail on the SFA Group's ethical guidelines and expectations of its employees and stakeholders.</p> <ul style="list-style-type: none"> - Implementation and oversight: Addition of this section that specifies how the Code will be applied within the company. - Languages: The update clarifies that the Code will now be available in multiple languages to reflect the diversity of the SFA Group. - Values: update of the SFA Group's new values - Guiding principles: The guidelines have been structured by CSR topics and new chapters have been added. - Reporting concerns and whistleblowing: A new section encouraging transparency and accountability has been added, highlighting the importance of reporting issues by employees and stakeholders, as well as the penalties that can be imposed.



GROWING TOGETHER

SFA Group

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