



CODE OF CONDUCT

Groupe Snef – Internal Document
2025 Update

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EDITORIAL

Stéphane Corteel, Chief Executive Officer, Groupe Snel

"Groupe Snel has always affirmed its commitment to the values of independence and integrity. The Code of Conduct simply reiterates provisions that have long governed the daily activities of the employees of our company.

The General Management invites all of you to reiterate your commitment to these values that have enabled us to navigate more than 120 years of history, with the pride of owing our own success only to our unique entrepreneurial spirit and our daily work. All together, we wish to reaffirm our commitment to building an honest future, without any compromise.

Our values are and will remain our strength.

We are Groupe Snel, and proud to be a part of it."

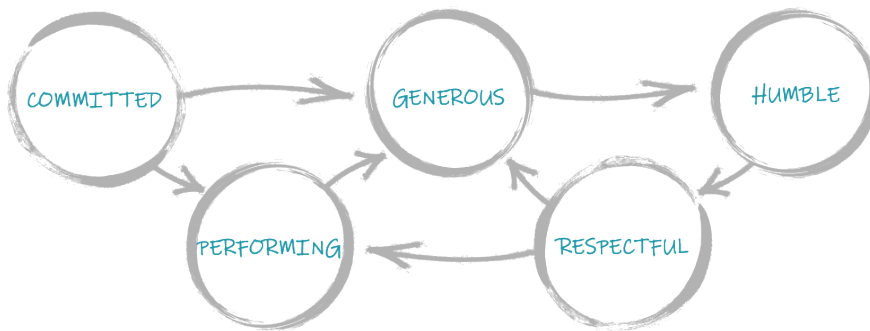


Our fundamentals

The Team Snef consists of all employees of the Groupe Snef (or “Company”). All our professions unite around the same values, those of a single team, Team Snef, with the same commitment since the Company's inception. We speak of the Team Snef Attitude which embodies the values of the Groupe Snef: Respect, Sense of Responsibility, Drive for Excellence, Humility in Our Daily Tasks

These are the values of a cohesive team, faithful to the spirit of freedom and entrepreneurship of the Company. They are reflected daily in a keen sense of service, ethics, performance, and the most basic respect: people’s safety.

TEAM SNEF *Attitude*



Within the Company, we have defined **four Codes of commitments** that reflect the adherence of all subsidiaries and all employees to the principles stated in each of them.



Safety

- Ensure compliance with safety rules: «Zero accident» objective;
- Preserve the health and integrity of employees;
- Protect production tools and the Group's image;
- Empower stakeholders and the hierarchical chain;
- Ensure exemplary behavior in the field.



Ethics & Compliance

- Act transparently and responsibly in compliance with Group values, the Code of Conduct, and laws and regulations in force in all countries;
- Apply a zero-tolerance policy in case of breach of our principles regarding ethics and compliance;
- Preserve the group's reputation and protect its employees, managers and stakeholders.





Environment

- Act on our own carbon footprint;
- Adopt a responsible purchasing approach;
- Support our clients in the energy and environmental transition;
- Mobilize the Group's companies and their employees.



IT Security

- Guarantee the confidentiality, integrity and availability of information of the Group and its Clients;
- Provide robust systems respecting the best cyber practices;
- Continuously monitor our information system to detect and neutralize threats;
- Promote a cybersecurity culture among all our employees.

Gouvernance

The Chief Compliance Officer (“CCO”), appointed by the Board of Directors, is responsible for the Company’s Ethics & Compliance Program. The CCO trains, supports, and relies on a network of Compliance Officers appointed by the Board of Directors in each of our brands: Snef, Ekium, Fouré Lagadec, Watt, Iqanto, Visiativ, and ABGI, and in our main locations, Brazil, Africa, Central Europe, and Spain/Portugal.

The Chief Compliance Officer reports at least once a year to the Company's Ethics & Compliance Committee, which reports to the Board of Directors.

What is the Code of Conduct?

The Code of Conduct is the **common reference framework** of the Company.

The Code of Conduct is part of the Company's Ethics and Compliance Program. Its objective is to reaffirm our commitments, the rules of conduct, and what is expected from each employee in terms of behavior toward a colleague, a client, a supplier, a subcontractor and all other stakeholders.

This revision of the Code of Conduct has been published to reflect best practices, lessons learned from real-life cases and applicable laws and regulations, particularly the French law on transparency, the fight against corruption, and the modernization of economic life (known as “Sapin II”).

The rules of conduct contained in this document are not intended to be exhaustive but rather constitute a set of useful guidelines intended to help everyone determine his or her conduct in certain situations.

Thus, the Code of Conduct contains practical examples to illustrate certain topics and refers to internal policies and procedures in a section called "Resources" to which you can refer.



Who is it for?

The Code of Conduct applies to all staff members of all Company's entities located in France and internationally.

All executives and managers have an obligation to promote compliance with the rules stated in the Code of Conduct.

The implementation of the Code of Conduct calls upon everyone's sense of responsibility.

As an executive and manager, you must:

- Lead by example by respecting the principles stated in the Code of Conduct,
- Create a work environment in accordance with the Code of Conduct,
- Proactively identify and reduce risks associated with your sphere of responsibility,
- Ensure that the personnel you manage have read and understood the Code of Conduct and act in compliance with,
- Verify that the people you manage complete all training related to the Code of Conduct,
- Provide your support to employees who, in good faith, ask questions and report facts,
- Take appropriate corrective measures to address questions and concerns raised,
- Consult your N+1 and/or your Compliance Officer or the Chief Compliance Officer if you have uncertainties about the conduct to adopt in a particular situation.

As an employee, you must:

- Read, understand, and act in accordance with the Code of Conduct,
- Complete all training related to the Code of Conduct,
- Not hesitate to ask any question or report any concern related to the Code of Conduct and its application,
- When possible, stop any activity or behavior that conflicts with the Code of Conduct,
- Not place the Company and/or yourself in an illegal situation or one contrary to the principles stated in the Code of Conduct,
- Not act in a manner likely to harm the Company,
- Not make decisions that you would have difficulty explaining
- Avoid any appearance of inappropriate conduct
- Use your best judgment and common sense
- Consult your N+1 and/or your Compliance Office and/or the Chief Compliance Officer if you have uncertainties about the conduct to adopt in a particular situation.

All our suppliers and subcontractors must sign our Suppliers and Subcontractors Code of Conduct (or equivalent).

The Code of Conduct must also be shared with our clients and other partners, and more broadly all third parties, as they have a direct impact on our reputation. They must adhere to the same (or similar) commitments and principles as stated in our Code of Conduct.

Compliance with laws and regulations

Groupe Snef maintains its reputation by complying with the laws and regulations in force in all countries where the Company is established and/or operates.



Groupe Snef complies with the principles set forth in the Universal Declaration of Human Rights, the Fundamental Conventions of the International Labour Organization (ILO), and the Guidelines of the Organisation for Economic Co-operation and Development (OECD).

As part of its commitment to sustainable and responsible business practices, the Company has incorporated the Ten Principles of the United Nations Global Compact into its strategies and operations. It is committed to respecting human rights and international labour standards, protecting the environment, and combating corruption in all its forms.

No employee may violate a law or regulation on behalf of the Company. They also must not encourage an employee or a third party to do so. No commercial objective can justify violation of any laws and regulations.

Compliance with internal rules, principles, instructions, procedures and policies (« Groupe Snef Rules »)

In addition to the laws and regulations applicable to our activities, the Company has established rules, principles, instructions, procedures, and internal policies that govern the daily activities of Company's employees (the "Groupe Snef Rules") and complement the Code of Conduct. Each employee must apply and comply with said Rules applicable to their activity. The Groupe Snef Rules are regularly updated and available on our Intranet site (Snef & You).

In case of contradiction between a law applicable in a country where the Company operates and a principle stated in this Code of Conduct (including the Groupe Snef Rules), the most stringent regulation or principle must apply.

Sanction(s)

Non-compliance with the principles stated in this Code of Conduct by employees exposes them to disciplinary measures and sanctions proportionate to the severity of the facts and may lead to dismissal.

Non-compliance with laws and regulations (particularly regarding corruption prevention and competition law), Groupe Snef Rules, and principles stated in the Code of Conduct could expose the Company, its executives, and its employees to administrative, civil, and/or criminal sanctions, as well as significant financial penalties and serious damage to the Company's reputation.

How to report a problem or ask a question?

Depending on the situation, decision-making can be complex and have significant consequences. The Company encourages a culture of dialogue and communication.

Employees faced with a risk or situation likely to constitute a violation of applicable laws or regulations, the Groupe Snef Rules, or principles stated in this Code of Conduct is encouraged to report this situation without delay to their N+1 or N+2, following the hierarchical chain.

You can also contact your Compliance Officer or the Chief Compliance Officer if you have uncertainties about the conduct to adopt in a particular situation.



Finally, you can also report the problem using the channels available in countries or affiliates as indicated below, or contact the Chief Compliance Officer directly using the following "Corporate" address: compliance@groupe-snel.fr

A phone line is also available at the Corporate level: (+33) 04 86 13 88 88.

- **Romania and other Eastern Countries:** compliance.romania@imsat.ro
- **Brazil:** canaldecompliance-snel-brasil@iaudit.com.br / Tel : 0800 066 0661
- **Africa:** compliance@groupe-snel.fr
- **Ekium:** compliance@ekium.eu
- **Fouré Lagadec:** compliance.fl@fourelagadec.com
- **Snel SA** (and its affiliates in France) : compliance@snel.fr
- **SPS:** compliance@groupe-snel.fr
- **Watt:** compliance@groupe-snel.fr
- **Iqanto:** compliance@groupe-snel.fr
- **Visiativ:** ethicsalert@visiativ.com
- **ABGI:** ethicsalert@visiativ.com

The Company ensures the confidentiality of reports at all stages of the processing.

Anonymous reporting is possible unless local laws prohibit it, but it is not encouraged. Providing your name when reporting will protect you from any form of retaliation and allow us to request additional information.

No retaliation is tolerated against any person who has used this system in good faith, nor against a person who has helped a whistleblower or has a connection with them, even if the allegations prove to be erroneous.



RESOURCE:

- Whistleblowing mechanisms

Audit and Internal Control

All financial and accounting information must be duly and correctly recorded in the books and accounts of the Company and can in no case be subject to incomplete, erroneous, or fraudulent processing. Accounts must never be used to conceal transactions (e.g., false entries, hidden commissions, gifts, "facilitation" payments), trading in influence, or other inappropriate transactions.

The Company's Audit and Internal Control Department provides the General Management with assurance of compliance with the Groupe Snel Rules and principles stated in this Code of Conduct. At the request of the General Management and/or the Chief Compliance Officer, this department may conduct internal investigations. These internal investigations may be initiated when a breach or report (alert) has been escalated. They aim to :

- Establish facts objectively and in a documented manner
- Understand the origin of the problem
- Propose corrective measures
- Strengthen the culture of compliance and integrity within the Company



Resources

The Code of Conduct and numerous ethics and compliance procedures are available on the Intranet site (Snel & You) : [Intranet Compliance - Home](#) or on any intranet site of any subsidiaries within the Company. The Code of Conduct is available in several languages. The original version written in French shall prevail over any translation.



1 Employees Rights

1.1 Health and Safety

The health and safety of all Company's employees and all those who could be affected by the Company's activities is an absolute priority.

The Company makes no compromises on safety. We aim for zero accidents. It is a constant concern and everyone's responsibility.

The Company's general safety policy is based on a conviction that safety is a key to operational performance. It must be championed by management at all levels. It is based on a few simple and pragmatic actions related to: awareness, training, accountability, and development of a culture of prevention.



EXAMPLE:

An employee on a site recently witnessed a situation that could have led to a workplace accident. Some colleagues were tempted to overlook it.

→ *Is this authorized? No! Any incident with high severity potential must be reported to the management chain so that prevention actions can be taken and the "near-miss" register completed.*



RESOURCE:

- The whistleblowing mechanism(s)

1.2 Human Rights

The Company promotes the elimination of all forms of illegal, forced, or compulsory labor and the abolition of child labor for children who have not reached the minimum age required according to applicable local law.

1.3 Freedom of association and collective bargaining rights

The Company is committed to respecting the freedom of association of its employees as well as their trade union and collective bargaining rights in accordance with applicable legal provisions.



1.4 Harassment

The Company advocates zero tolerance toward harassment in all its forms and is committed to providing a healthy work environment, without any form of harassment (moral or sexual) or intimidation.

All employees must ensure that their acts and behavior are not likely to infringe upon the rights and dignity of their colleagues and any third party with whom they interact.

Any act contrary to these principles is strongly prohibited and sanctioned.

The Company sanctions sexist behavior, which is defined as any conduct related to a person's gender, having the object or effect of infringing upon their dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.



EXAMPLE:

My manager humiliates me in the presence of colleagues or clients. They make fun of my ideas and make inappropriate comments about my physical appearance.

→ Am I in a "harassment" situation? You should discuss this as soon as possible with your N+2 and/or your Human Resources Manager and/or your Compliance Officer to analyze the global situation and take all necessary measures. In any case, every employee must be treated professionally and with respect.

1.5 Non-discrimination, Equal Opportunity, Inclusion

The Company constantly ensures respect for employee rights with the principle of not operating any discrimination, for any reason whatsoever, in hiring and in work relationships.

Recruitment, training, compensation, promotion, assignments, and other work-related decisions are based exclusively on the qualifications, skills, achievements/results, expertise of each employee, and their professional motivations, all without consideration of race, color, religion, sex, national or social origin, age, sexual orientation, marital status, health status, disability, political opinion, sexual reassignment, or any others.



EXAMPLE:

My employee shared with me her disability.

→ What can I do to help her? Listen and advise her to contact her Disability Representative and/or her Human Resources Manager to determine the best possible measures to support them in their daily work.



2 Business Ethics

2.1 Compliance with Competition Laws

Compliance with competition laws guarantees fair competition between companies. Competition is a driving force of economic success.

The Company prohibits all unfair business practices and non-compliance with competition laws, national and international.

Therefore, Company's employees are prohibited from:

- Concluding or participating, directly or indirectly, in any anti-competitive agreement or understanding, or more generally in any relationship leading to restricting the scope of competition (e.g., price fixing, market sharing, territory or customer allocation, production limitation, bid rigging);
- Abusing a dominant position in a market, particularly by imposing unfair commercial conditions (by unjustified refusals to sell or by practicing predatory pricing);
- Participating in agreements with suppliers or distributors aimed at restricting the free setting of resale prices or commercial freedom.

The Company's employees must not share with competitors commercially sensitive or strategic non-public information (prices, profits, margins, customer lists, investment plans, or other confidential information) likely to distort the competitive landscape.

Employees must be particularly vigilant when participating in professional association meetings, conferences, or events to avoid any suspicion of violating free competition rules.

Employees must not use illicit or unethical means to obtain information about competitors.

As part of fair business practices, Company's employees must not deliberately denigrate, slander, or defame competitors in any way, particularly regarding their qualifications, performance, and skills.



EXAMPLE:

I am preparing a response to a tender. A colleague in a competing company calls me to discuss this tender. He asks me to withdraw from this tender and to bid on the next tender.

➔ What should I do? You must immediately respond that the call is inappropriate, end the conversation, and inform your superior and your Compliance Officer or the Chief Compliance Officer of the situation and your action. You must not allow yourself to be influenced. The disclosure of information related to a tender constitutes a criminal offense in some countries.



2.2 Corruption & Influence Traffic Peddling

The Company advocates zero tolerance for corruption and traffic peddling (trading in influence).

Our relationships with all stakeholders must be based on trust and mutual understanding that any form of corruption is unacceptable in our activities. Our success is based on our work, the quality of our services and products, our employees, and the value we bring to our clients.

Any act or attempt at corruption or traffic peddling, or other breach of integrity is strictly prohibited.

It is prohibited to offer, give, solicit, receive, or accept (directly or indirectly) any gift or hospitality, whether in the private or public sector, to influence behavior or a decision in favor of the Company. This may cover any form of inducement in exchange for preferential treatment, with the aim of obtaining a commercial advantage or retaining a contract.

It is prohibited to ask a third party to make or authorize them to make promises, offers, or payments of this kind.

Traffic peddling is a form of corruption. Traffic peddling refers to a person having a public function who monetizes their quality, influence, or power, real or supposed, to obtain a decision or favorable opinion that will be taken by a third party. Unlike corruption, three actors are involved: the beneficiary (the one who provides advantages), the intermediary (the one who uses their position/influence), and the target person who holds decision-making power (authority, administration, expert, for example).

Any so-called "facilitation payment" is prohibited. A facilitation payment corresponds to a gift or sum of money improperly offered to a public official to expedite or complete administrative formalities that should be obtained through normal legal channels. Such payments are acts of corruption contrary to the Company's policy and illegal in many countries (including France) and therefore not authorized within the Company.

It is the responsibility of all employees to comply with the laws and regulations in force regarding the fight against corruption (Sapin II Law in France, FCPA in the United States, UK Bribery Act in the United Kingdom) in the countries where the Company is established and/or operates.



EXAMPLE:

Case N°1: A supplier promises you that if he is selected, you will be rewarded.

→ Is this acceptable? No. You must absolutely refuse and inform the supplier that no supplier can be unfairly favored to the detriment of another. This "reward" would be considered an illicit payment. Your N+1, your Compliance Officer, or the Chief Compliance Officer must be immediately informed of the situation and the reaction adopted. Note that you must conduct competitive bidding with your suppliers.

Case N°2: A Company's employee, with a delegation of powers, tells you that he is considering hiring the daughter of a public official so that he can use her influence on a city tender commission with the aim to be awarded the contract.



→ *Is this acceptable? No! You must immediately stop him in his intentions and remind him of the principles of the Code of Conduct and his commitments under his delegation of powers. You must inform his N+1 and contact your Compliance Officer or the Chief Compliance Officer to analyze the situation and take necessary actions and measures.*

2.3 Gifts and Invitations

Granting or receiving any gift and/or invitation is prohibited when this action would be contrary to applicable law or could lead to an undue advantage and/or be perceived as a means of influencing a decision and/or retaining a contract, administrative authorization, and/or favoring a company or person.

Gifts and invitations must remain exceptional.

Gifts offered during a traditional holiday or at year-end, as a sign of courtesy according to local custom or esteem, or in the form of an advertising or promotional item of reasonable value are acceptable.

It is acceptable to offer or honor an invitation to an event, provided that it is part of a business meeting/relationship, that the event has a reasonable value, that it is transparent internally, and that the Company's employee(s) accompany their guest(s) to this event and after validation by the N+1.

It is acceptable to offer or be offered a meal as part of a commercial meeting aimed at promoting the Company's services or in the context of a discussion on a project with a client or an already signed contract. There must be a professional reason related to the beneficiary's activity. In any case, invitations must be reasonable in terms of amount according to circumstances, local customs, and participants.



EXAMPLE:

Case N°1: A close associate of a public official makes you understand that they could help the Company obtain a public authorization necessary to finalize the project if you provide them with plane tickets and seats to come to Paris to attend the Soccer World Cup.

→ *Is this acceptable? No! You must politely decline this request and explain that this "conditional" request does not fit within the Company's practices. You must inform your N+1 or Compliance Officer or the Chief Compliance Officer.*

Case N°2: A supplier offers to a buyer on your team a luxury brand pen with his initials at year-end to thank him for their business relationship.

→ *Is this acceptable? No. You must politely indicate that this does not fit within the Company's policy. You must inform your N+1 and your Compliance Officer or the Chief Compliance Officer*



RESOURCE:

- *Procedure on Gifts and Invitations*



2.4 Sponsorship and Patronage Activities

Sponsorship and patronage activities are limited within the Company. The sponsored actions are essentially in the fields of culture, sports, health, education, research, and environment. These sponsorship and patronage activities are subject to particular verifications and precautions to ensure that these actions do not conceal acts of corruption.



EXAMPLE:

In the context of a tender, the client asks you to sponsor the local association for the construction of a football stadium and lets you understand that if you accept, they will help you win the contract.

→ Is this acceptable? No! This is a form of corruption. This request must be politely refused. You must inform your N+1, your Compliance Officer, or the Chief Compliance Officer.



RESOURCE:

- *Procedure on sponsorship and patronage activities*

2.5 Conflict of Interests

A conflict of interest arises when a personal interest conflicts with the legitimate interests of the Company. There may be a conflict of interest if your personal, social, financial, or political activities (or those of your family members or close associates) conflict with your professional responsibilities within the Company.

Company's employees are bound by a duty of loyalty, to act in good faith, and to adopt exemplary behavior. As such, each employee must ensure not to place themselves in a conflict of interests situation and to prevent and report any real, apparent, or even potential conflict of interest situation in order to take appropriate measures.



EXAMPLE:

Your employee in the Purchasing Department informs you that her husband has just been recruited as a commercial director in a company from which Groupe Snef purchases protective equipment.

→ Is this a problem? Presumably, yes. Various elements must be analyzed, such as the role and responsibilities of this employee and the same on her husband's side. As the described situation carries an appearance of conflict of interest, it should be reported to your N+1, or to the Compliance Officer, or to the Chief Compliance Officer. Remediation measures can certainly be implemented in the described situation (e.g., Remove your employee from any connection with this supplier)



RESOURCE:

- *Procedure on conflict of interests.*



2.6 Public Procurement

Public procurement refers to contracts entered into with a country's government or with national, regional, or local public entities or any entity falling under the Public Procurement Code of the country concerned.

Public procurement is subject to specific and strict laws, regulations, and procedures that all employees within the Company must comply with.

Public procurement rules being complex and different from one country to another, employees must consult Contract Management / Legal Department for clarification if necessary.

Any form of corruption and trading in influence toward public officials, an authority, or a public administration is strictly prohibited by the Company.

Toward public officials, Company's employees must act with integrity and transparency. The notion of public or government official is defined broadly. It includes any person holding public authority, working for a public body, any person responsible for a public mission or invested with an elected public mandate, any candidate of a political party, and/or any company owned or managed, in whole or in part, by the State or by a State agent.

2.7 Relations with partners

The Company is committed to providing clients with high-quality products and services that meet their needs. We do everything possible to support our clients in growth, innovation, and sustainable development. We commit to creating value through our know-how and interpersonal skills and to building long-term trust relationships.

By engaging in a responsible purchasing strategy, our goal is to establish with our suppliers, subcontractors and service providers ethical relationships in conducting our purchasing activities, based on the principles set out in the Code of Conduct. The purchase of goods and services is based on neutral and objective criteria such as price, quality, performance, and sustainable development.

The Purchasing function is an integral part of the strategy implemented within the Company and constantly requires acting with loyalty, integrity, reliability, fair treatment, and impartiality in relationships with our suppliers, subcontractors and service providers.

The Company expects its suppliers, subcontractors and service providers to comply with the principles of our Code of Conduct and sign our Suppliers and Subcontractors Code of Conduct (or equivalent). They may be required to provide proof of application of principles governing business ethics, rules relating to the fight against corruption, human rights, labor standards, and their environmental commitment.



Relations with all our partners (clients, suppliers, subcontractors, or other partners) must be managed with caution, transparently, in compliance with the Groupe Snel Rules to avoid giving the impression that decision-making would be compromised. Employees must remain vigilant in the exercise of their function in controlling said third parties, in entering into contracts and orders, and/or monitoring relationships.



RESOURCE:

- *Procedure on third party evaluation and due diligences*
- *Procedure opening and modification of a supplier account*
- *Procedure on subcontracting and services providers*
- *Procedure on opening and modification of a client account*

2.8 Public Activity

The Company observes strict political and religious neutrality.

The Company respects the individual commitment of its employees in public, political, or associative activities conducted outside the professional framework. All these activities must be undertaken personally, in your name and at your expense, and without using Company's property and resources, to avoid creating a conflict of interests' situation. However, such commitments must not harm the activity or brand image of the Company.

The Company does not make any financial contribution to political candidates, elected officials or representatives of elected officials, political parties, government members and their advisors, or religious institutions.

2.9 Fight against money laundering, fraud and terrorism financing

Money laundering consists of concealing the origin of funds acquired through illegal activities, such as tax evasion, corruption, financial fraud, or terrorism financing, to make them appear legitimate.

The Company is committed to the fight against money laundering and other associated offenses listed above and commits to conducting its commercial and financial transactions in compliance with all applicable laws and regulations.

2.10 Export Controls and Economic Sanctions

Due to the nature of some of its activities and its global presence, the Company undertakes to comply with all laws and regulations relating to export controls, economic sanctions, trade restrictions, or embargoes, regardless of where the Company is established and/or conducts its activities.



Within the framework of export control, laws and regulations may require obtaining licenses and/or compliance with specific conditions set by the relevant authorities before any equipment, service, or technology can be exported, re-exported, or transported.

Economic sanctions provisions may target particular countries, specific sectors of activity within countries, as well as individuals and/or organizations.

Penalties for violation of these laws and regulations can be very severe and may include high fines, revocation of export licenses, and market exclusion measures



3 Assets Protection

3.1 Confidentiality

Employees may hold information belonging to the Company that must remain confidential insofar as its disclosure or revelation could harm the interests of the Company.

Employees have an obligation not to disclose to third parties or to other Company's employees who are not authorized to have knowledge of it, information to which they have access in a professional context, which must remain confidential. Confidential information includes business results, acquisition strategy, development of new technologies, products or services, customer lists, compensation policy, know-how, databases, and all other sensitive data.

This confidentiality obligation extends to information received from a client, supplier, or other third party as part of providing our services and products or purchasing supplies or service provisions.

It is each employee's responsibility to ensure compliance with rules for identification, dissemination, reproduction, conservation, and destruction of confidential information belonging to the Company or received from a client, supplier, or other third party, whether contained in a document or on any other medium.

Even greater vigilance is required when the Company operates in commercial relationships with certain clients, particularly in the field of National Defense, which imposes compliance with increased obligations regarding the protection of confidential information.

The confidentiality obligation requires an attitude of caution and responsibility to ensure non-disclosure and protection of confidential information in the possession of Company's employees.

Employees remain bound by this confidentiality obligation after leaving the Company.



EXAMPLE:

One of your employees is very active on social networks. You are alerted that they are posting photos of themselves on construction sites, with plans of a factory belonging to a client.

→ Is this a problem? Yes! This information is confidential, particularly the factory plan belonging to the client where the employee is working.

3.2 Protection of assets and resources

The Company makes available to its employees' various media, electronic and digital tools, material goods, and other resources. These goods and resources are the property of the Company or a third party that has made them available.



Employees are responsible for the proper use and protection of the Company's goods and resources entrusted to them and/or to which they have access as part of their professional relationship and for professional use.

These goods and resources must be used in accordance with their professional purpose and/or within the framework set by the Groupe Snef Rules.

It is each employee's responsibility to protect these goods and resources against any degradation, alteration, fraud, loss, or theft. Except with prior written authorization from their hierarchical superior, these goods and resources may not be used for personal purposes.

Employees may use goods and resources belonging to a third party as part of their professional activities. Employees must respect the resulting obligations communicated by the third party.



RESOURCE:

- *IT Policy*

3.3 Protection of Personal Data

The Company has always recognized the importance of protecting personal data, whether from its clients, partners, suppliers, subcontractors, and employees, in accordance with applicable laws and regulations on personal data protection, particularly the European Regulation on data protection ("GDPR").

The notion of personal data is very broad since it covers any information relating to an identifiable natural person, directly or indirectly (Example: a name, photo, fingerprint, postal address, email address, telephone number, social security number, internal employee number, IP address, computer login identifier, voice recording).

The Company commits to limiting the collection and processing of employees' personal data to what is strictly necessary and to respecting associated rights (particularly the right of access, rectification, or opposition to data processing) in accordance with applicable legal requirements.



EXAMPLE:

An employee receives by mistake a file with the names, addresses, and bank accounts of all employees of a client.

➔ *What attitude should be adopted? As soon as you notice the error, you must stop reading and refrain from using this data for any purpose whatsoever. You must delete the email, immediately alert the person who sent it to you, and contact the IT Security Department (DSI) and the Chief Compliance Officer.*



3.4 Protection of Intellectual Property

Intellectual property is a major asset of the Company, a source of differentiation.

Intellectual property is essential for the success of the Company's activities and its development. It is integrated into our service and product offering and becomes the basis of solutions enabling us to respond to our clients.

The Company's intellectual property notably consists of inventions, source codes, software, algorithms, databases, documentation, specifications, trademarks, designs and models, or protected confidential information (formulas, know-how, flowcharts, business processes, marketing plans, etc.). These assets are protected, according to their nature, by intellectual property rights (such as patents, copyrights, trademarks, or designs) or similar rights (such as trade secret protection).

It is the responsibility of all Company's employees to ensure its protection. The Company commits in the same way to protecting and respecting the intellectual property of its clients and other business partners.



4 Protection of the environnement

The Company has been committed since 1905 to sustainable and responsible business development.

The Company commits to contributing to energy and environmental transition to address global climate challenges. With its technical expertise, the Company is alongside its clients to provide concrete and effective solutions to achieve their decarbonization objectives.

As a service provider, the Company is a low emitter of greenhouse gases. Nevertheless, we have our role to play in contributing to mitigating global warming.

To support its action, the Company has developed its environmental policy, "Snef Act", which provides a framework for all actions undertaken within each of its subsidiaries for many years and sets a course that commits the entire Company for the years to come.

The Company's environmental policy is structured around four major commitments:

- Act on our own carbon footprint
- Adopt a responsible purchasing approach
- Support our clients in energy and environmental transition
- Mobilize all Company's subsidiaries and employees



RESOURCE:

- *The « Snef Act »*





www.snef.fr

2B boulevard Euroméditerranée
Quai d'Arenc
13002 MARSEILLE
T +33 4 91 61 58 00
www.snef.fr - contact@groupe-snef.fr

Société Anonyme au capital de 42 065 628 euros
RCS Marseille 892 165 994
SIREN 892 165 994
N°TVA FR80 892 165 994



NOUS SOUTENONS
LE PACTE MONDIAL