



ETHICS POLICY



The orientation of the SAMAT Group towards the principles of Corporate Social Responsibility (CSR) is reflected on a daily basis by the implementation of values of respect, fairness, loyalty, professionalism and responsibility which are set out in this policy.

This Policy, supported by the Fundamentals that guide us, supports the principles of the United Nations Global Compact, deploys the associated Sustainable Development Goals, and formalizes our commitment to ethical issues.

*The mission of the SAMAT **Ethics Committee** is to study any situation or fact in relation to the values of the Group. It can be consulted to shed light on whether questions or issues have not already been resolved by the boards or the hierarchy directly concerned.*

The committee meets periodically to take stock of ethics or exceptionally in the event of a matter requiring it.

SAMAT Group stakeholders can contact the committee directly through the email address:

ethics.committee@samat.com

I commit myself and invite all Group employees, as well as our suppliers, customers and other stakeholders, to fully commit to the application of the principles of this Policy on a daily basis."



Florence DUPASQUIER
CEO of the Groupe Samat

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SOCIAL RESPONSIBILITY

COMPLIANCE WITH LAWS AND REGULATIONS

This Policy is in line with the laws in force in the countries where the SAMAT Group operates, as well as international conventions or standards (United Nations, OECD, etc.).

Any stakeholder concerned, internal or external, must apply the legal requirements applicable to their level and escalate any related difficulty up the hierarchy.

RESPECT FOR HUMAN VALUES

These are at least:

In terms of Safety and Health:

Guarantee and preserve the health, safety and integrity of people, property and the environment, in all phases of our activities, on site and on the roads, while reducing our HSE impacts,

Ensure the safety of our operations by preventing and minimizing the risks of malicious acts,

Permanently prevent, eliminate or control the risks inherent in our activities, by managing and improving in particular the behavioral aspects associated with safety (BBS),

Respect our regulatory environment, implement active prevention against the use and abuse of alcohol, drugs and medication.

In terms of Respect for Human Rights:

- Respect fundamental human rights, regulations and working conditions, combat all forms of illegal, child or forced labor or human trafficking and ban discriminatory and arbitrary practices in the management of human resources,
- Balance professional and private life, improving the work environment and the well-being of everyone,
- Combat all forms of discrimination, promote diversity and equal opportunities, value the diversity of backgrounds, cultures and origins and only create or use media that neither convey nor perpetuate stereotypes regarding gender, religion, ethnicity or disability.

In the event of facts related to sexual harassment or sexist acts, reports can be made directly to the Directorates of the Subsidiaries, or to the Group Management via the email address:

harassment.alert@samat.com

- Promote social dialogue and respect freedom of association, expression, and collective representation,
- Integrate and train the staff involved, both initially and continuously, and encourage internal development.

RESPECT THE ENVIRONMENT

- Prevent and control risks that may have an impact on the environment,
- Efficiently use our resources to reduce our polluting emissions, in particular those from our vehicle fleet,
- Limit damage to biodiversity as much as possible and promote its maintenance,
- Make our employees aware of environmental issues and promote the adaptation of behavior that should result from it,
- Encourage the development and dissemination of ecological and security technologies.

LOYALTY IN BUSINESS

- Listen and dialogue with our stakeholders to understand their concerns and expectations,
- Communicate transparently on our performances and achievements,
- Optimize all operating costs while respecting the regulatory, social and environmental framework,
- Orient our policy to:
 - Develop effective and lasting partnerships with both our customers and our suppliers,
 - Demonstrate fairness and ethics in our business,
 - Reject all forms of corruption, internal to the Group or from outside (suppliers, customers, or any other organization),
 - Respect competition rules and exclude anti-competitive practices,
 - Combat conflicts of interest, fraud and money laundering.
- Continuously increase the satisfaction of our customers through services in line with their expectations within a mutually agreed framework,
- Warn the latter in the event of difficulties to minimize their impact,
- Respond effectively to permanent or ad hoc customer requests by offering efficient solutions,
- Guarantee the sustainability of the company by optimizing costs and profitability,
- Constantly ensure both the sale at the right price of our services and the good control of our costs in each business,
- Develop effective and lasting partnerships with our customers and suppliers.

RESPONSIBILITIES RELATED TO CONFIDENTIALITY AND IMAGE

Comply with the General Data Protection Regulation (GDPR) by protecting personal data, limiting access to this information, and securing our information systems

All communications or official information to the written media, radio, television, or other social networks and websites can only be done by the management of the SAMAT Group or with its formal agreement

All information, non-public, relating to the SAMAT Group, its customers, suppliers or other interested parties must remain confidential for the required users and never be disseminated internally or externally

Any person, employee, supplier, customer, or other interested parties who express themselves informally publicly about the SAMAT Group, including on social networks and other websites, must respect the principles of confidentiality and politeness and never harm the image of the company

PREVENTION OF CORRUPTION

COMMITMENT TO COMBAT CORRUPTION

The SAMAT Group clearly states its willingness to conduct its activities fairly, honorably, with integrity and honesty in compliance with the regulations in force in the environments within which it operates. The SAMAT Group is committed to combat all types of corruption, active or passive, within or outside the Group.

Consequently, all forms of practices such as bribes, extortion, solicitation and influence-peddling are absolutely prohibited in all forms, at all times, in all places and regardless of motivation. Such acts are subject to disciplinary sanctions without prejudice to any proceedings that may be initiated within the context of the regulations in force.

PREVENTION POLICY

Identifying behaviors:

Specifically, misconduct is characterized as follows:

- the giving or promising of money or a gift in exchange for an undue advantage, be it between employees of the Group, vis-à-vis third parties or public officials,
- the acceptance of money or a gift in exchange for an undue advantage or the promise of such gift, be it between employees of the Group, vis-à-vis third parties or public officials.

The acceptance or offer of symbolic gifts, such as "corporate" objects or invitations for a trivial amount designed to establish or maintain good business relations is authorized, provided such attempts are of reasonable frequency and volume and that no solicitation for, or promise of, undue advantage is associated with it or suspected.

Reporting misconduct:

In the event of facts related to corruption or money laundering, reports can be made directly to the Directorates of Subsidiaries, or to the Group Management via the email address:

corruption.alert@samat.com

No prejudice must be brought against any person who, in good faith, reports suspicions of a breach of these rules or who refuses solicitations, without prejudice, however, to the regulatory provisions concerning defamation or slanderous denunciation.

Responsibility and support for employees:

Each employee is responsible, according to the extent of their activities, for the implementation of this Policy, including employees engaged in sale or purchase transactions.

Within each site or service, the manager or person in charge of the service has particular responsibility to guarantee that this Policy is observed in their area of responsibility and acts as a "go-between" with the Group's central management. At central management level, a member of the steering committee is specifically responsible for this role for the entire Group.

The "go-betweens" described above can be called as counsel by those of their employees who are unsure about how to proceed in situations they suspect may be related to misconduct as defined by this Policy.