

ETHICS CHARTER



Document created from **S4-0072-21** standard.

SII Internal Validation			
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Distribution List		
Company	Department/Service	Last Name / First Name
All		

Version Log		
Date	Version	Version Purpose
September 2024	18	Inclusion of a Human Rights section, link to the integrity line platform and update from template S4-0072-21

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1. OUR COMMITMENT: PROFESSIONAL ETHICS UNDERPINNING RESPONSIBLE GROWTH

SII Group, in line with its respect for men and women, the environment, along with the needs of present and future generations, bases its development and actions in France and internationally on values and principles to benefit:

- its clients,
- its employees,
- its shareholders,
- the communities and countries where SII Group operates.

SII Group, a major operator among Digital Services Enterprises, aims to offer its clients high added-value solutions for technological projects. This aim, based on innovation and performance, is itself underpinned by ethics and responsible growth.

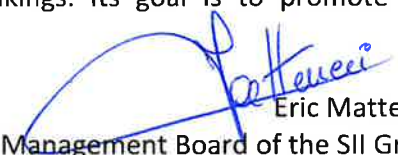
Gaining recognition as a responsible operator, ensuring the integrity and exemplary nature of its business conduct and contributing through its professional activities to the social development of civil society, requires that significant points of reference are established in order to sustain and increase the trust of its stakeholders.

This Ethical Charter is based on both the values of SII Group and the fundamental principles that the group undertakes to respect, namely:

- The Universal Declaration of Human Rights,
- The conventions of the International Labour Organisation, including those relating to the prohibition of child labour and forced labour,
- The United Nations Global Compact principles,
- The principles of the Organisation of Economic Cooperation and Development, particularly those relating the fight against corruption.

With this Charter, SII Group is collectively committed to a series of simple and shared principles to guide its conduct. The entire management team of the company is committed to the charter and it is made available to all stakeholders. This commitment must guide the actions of everyone, regardless of the geographical or cultural context, the status or position within the organisation.

This Ethical Charter supplements the Internal Regulations of SII Group and is intended for all employees. It does not replace the laws and regulations applicable in the countries where the SII Group operates, nor any existing agreements and undertakings. Its goal is to promote and guarantee a fair and effective application of its provisions.


Eric Matteucci
Chairman of the Management Board of the SII Group

2. SII's VALUES

SII Group is characterised by a corporate culture driven by strong values fully in line with the recommendations of "Global Compact", the initiative of the United Nations Secretary General.

Engagement and accountability

Within SII Group, each employee has the resources and responsibilities befitting their position. The escalation of information and making commercial or operational suggestions are all highly valued and encouraged. This culture of engagement implies to right to trial periods and the right to make mistakes. Internal promotions are favoured and based on human values.

Transparency

Information on the operation of SII Group is sent to employees, clients and shareholders in a sincere, speedy, exhaustive and comprehensible manner. Results, trends, objectives and operations at branches and subsidiaries are not considered as "industrial secrets".

Trust

Within the SII Group, trust forms the cornerstone of internal relations. In return for this trust, employees are requested to always deliver quality and commit to the corporate project and culture.

Quality and professionalism

Quality and professionalism are the historic values of this company created by engineers with a technical background. Despite the fact that over the years the company has expanded into the commercial world, these original values continue to dominate its culture.

The other strong values forming the cornerstone of the corporate culture of SII Group are ethics, respect, delegation, humility and prudence.

3. OUR COMMITMENTS AS AN “EMPLOYER”

3.1. Our employees

SII Group is confident in the loyalty, integrity, motivation, sense of initiative and responsibilities of its employees. Managerial staff undertake to:

- Provide training, encourage employees to take responsibility and offer support,
- Ensure consistent and fair treatment in terms of remuneration, training, promotion, in keeping with the skills and performances of each person.
- Develop a team spirit, professional conduct and the sense of service among employees,
- Set motivating objectives,
- Ensure the diversity of teams,
- Encourage flexibility in the organisation of work in order to promote an equitable balance between professional activities and private life,
- Respect the local laws for child care leave (without discriminating the gender of the employee),
- Respect individuals and their right to the protection of their private lives.

The total working hours (standard working hour + maximum overtime hours) should be within the regulatory limits. In case, maximum permissible working hours is undefined, then a limit of 60 hours per week need to be considered as per ILO recommendations. Under no circumstances, the total working hours can exceed 60 hours a week.

3.2. Diversity

SII Group conducts a proactive non-discriminatory hiring and professional equality policy in its management of careers in term of gender, race, ethnicity, sexual orientation, disability, age. SII ensures it takes diversity into account in each country where it operates. The commitments of the company in favour of non-discrimination and diversity are communicated internally.

As a signatory in 2014 of the Enterprise Diversity Charter, SII Group undertakes to condemn discrimination in the workplace and strives to promote diversity.

Diversity in terms of gender, origin, age and the integration of the disabled, young people and older persons are major challenges in relation to which SII Group is working to implement and roll out action plans on several levels:

- Regulatory: preventing and prohibiting all unequal treatment,
- Societal: encouraging access to employment and promotion for all employees,
- Economic: recruiting and taking advantage of the best skills.

SII Group makes sure it respects professional equality between men and women by guaranteeing equal treatment between the sexes in all socio-professional categories. Due to the technical sector in which the group operates, targets have been set in order to attract female talent. These include:

- Increasing the rate of female recruitment,
- A commitment to overcoming any gaps in pay,
- The implementation of a system to support pregnant women.

SII Group facilitates the professional integration of persons who experience difficulty accessing employment and, in particular, the disabled. Since 2008, a company agreement commits the SII Group to:

- Increase the number of disabled workers in the company,
- Integrate on a long-term basis any employees recruited via this system and oversee their professional careers,
- Continue raising everyone's awareness of the social commitment of SII.

3.3. Staff representative bodies (SRB)

SII Group encourages and promotes social dialogue aimed at maintaining internal social cohesion and the engagement of employees to the values of the company.

Employees of SII Group, who are members of the SRBs, undertake to:

- Maintain an attitude suited to the performance of their duties,
- Use their appointment in the interest of the employees of the SII Group,
- Contribute to the social dialogue.

3.4. Health & safety

SII Group offers a healthy and safe working environment. It ensures that its premises and professional practices comply with the law and regulations pertaining to health and safety for its employees, as well as for its suppliers, subcontractors and partners who are required to work in its premises.

SII Group evaluates the occupational risks of each of its employees at their place of work, both in its own premises as well as in those of its clients and shall communicate these risks to the parties involved. The analysis of occupational risks and associated preventative measures are formalised and communicated to all employees, suppliers, subcontractors and partners who work in the premises of SII.

SII Group shall organise training to obtain the authorisations required in relation to the risks to which its employees may be exposed.

At all sites belonging to SII Group, it is prohibited entering into or remaining in the premises in a state of inebriation. Smoking or vaping in closed and covered premises that constitute a place of work is prohibited. It is also prohibited to be under the influence of illegal substances or to be in possession of any such substances, whether in the premises of SII Group or those of a client, supplier, subcontractor or partner.

3.5. Harassment

Employees of SII may not carry out any moral or sexual harassment, any type of violence, or any other degrading behaviour vis-à-vis their colleagues. This relates to:

- Inappropriate behaviour such as verbal or physical conduct that threatens, intimidates or is forceful,
- Verbal insults and mockery,
- Negative stereotypes,
- Sexist acts,
- Sexual advances.

All these types of behaviours are punished by the sanctions set out in the Internal Regulations of SII Group.

4. OUR COMMITMENTS AS A “PARTNER”

Our clients

SII Group endeavours to offer its clients business and technological solutions to guarantee the results they expect, along with the appropriate know-how tailored to their needs.

All employees of SII Group undertake to:

- Only accept missions for which the company is qualified, in order to fulfil their remit in the best interests of the client,
- Adopt clear and explicit contractual forms that are in line with the reality of the services,
- Respect the confidentiality of information, data security and intellectual property rights and reject all forms of corruption,
- Refuse to participate in any prior or agreed arrangements that are contrary to the rules of free competition,
- Respect any contractually determined requirements, particularly in terms of security, reliability, quality and performance,
- Respect all approvals, certifications and regulations applicable,

These requirements cover not only the services offered by SII Group but also extend to the activities carried out by the suppliers, partners and subcontractors of the group.

4.1. Our suppliers

SII Group promotes a reciprocal climate of trust with its suppliers, subcontractors and partners. Buyers must comply with the good practices set out in the inter-enterprise charter (CDAF, French association for purchasing professionals).

All employees of the SII Group undertake to:

- Implement the Responsible Purchasing Charter,
- Guarantee data confidentiality,
- Treat their points of contact with honesty and respect,
- Select companies impartially based on pre-defined and transparent criteria.

Our competitors

SII Group strives to stand out from its peers and competitors through honest and legal means and through the quality of its services. It adheres to the fundamental principle of healthy and fair competition, as a factor of growth and innovation.

All employees of the SII Group and, more especially, those in commercial positions undertake to:

- Not harm any colleague through procedures, manoeuvres or declarations that are untruthful or contrary to the principle of fair competition.
- Not recruit staff from a competitive company for the sole purpose of diverting for the group's benefit an ongoing contract with a client,
- Not get involved in agreements with competitors for the purpose of, or which results in, the fixing of prices, the prevention of a bidding process, the sharing of a market, the limitation of production or the boycotting of a client or supplier,
- Not exchange sensitive information with competitors, in breach of competition law,
- Never abuse a dominant position.

Corruption

SII Group undertakes to respect statutory and contractual provisions on combating corruption and shall not tolerate any form of corruption, influence peddling or the involvement in any form of money laundering and terrorism financing.

SII Group therefore firmly rejects the offering, soliciting, or accepting, directly or indirectly, of incentives or rewards whose purpose is to obtain an undue advantage or influence a decision (cash, gifts, hospitality, entertainment, trips, services, etc.). Accordingly, employees are obliged to respect the SII gift policy applicable in the country.

This applies to relationships with an actual or potential client or supplier, both in the public and private sectors.

In particular, during negotiations or difficult competitive situations, all SII employees shall always conduct themselves fairly and honestly.

SII Group does not finance political parties or associations with a political purpose.

An anti-corruption practices guide is made available to employees. Its aim is to provide legal references and practical advice to help employees deal with potentially risky situations.

4.2. Conflicts of interest

All employees should avoid being confronted with situations in which their personal interests, or those of individuals or legal entities to which they are linked, conflict with the interests of the entities of the group.

If he/she is unable to avoid such a situation, the employee in question shall act honestly and fairly towards SII Group.

4.3. Confidentiality

Each SII employee is made aware of the importance of respecting confidentiality. Employees shall not disclose outside of the group any confidential information in their possession. Equally, such information may not be revealed to employees who are not authorised to possess such knowledge.

If an employee has access, through their professional activities or by chance, to confidential information, he/she shall take all due care to preserve its confidential nature.

This obligation survives the end of the contractual relationship with SII Group.

Each party shall ensure it protects and respects intellectual property and all projects and know-how of SII Group.

Employees and subcontractors sign a confidentiality undertaking.

4.4. Code of Ethics for stock-market trading

The actions of SII Group are carried out within the scope of a relationship of trust vis-à-vis its shareholders.

Moreover, all SII employees and, more especially, those working for national and international governance authorities undertake to:

- Respect scrupulously stock market rules and corporate governance principles,
- Regularly supply intelligible commercial and financial information on its activities that is relevant and reliable,
- Ensure the profitability of the shareholders' investments.

4.5. Insider trading

Any employee in possession of insider information likely to have an impact on the movements of a listed financial instrument of one of the companies of SII Group, may not disclose such information.

Equally, such employees may not perform any transactions on the financial instrument, either directly or through an intermediary, or permit, knowingly or not, a third party to perform such transactions, before the general public becomes aware of such information.

Any breach of this prohibition may implicate the personal and criminal liability of the employee.

5. OUR COMMITMENTS AS “CORPORATE AND RESPONSIBLE CITIZEN”

5.1. Local ecosystem

SII Group is present and plays an active role in terms of local challenges.

It supports:

- The digital sector in the interests of the profession, by encouraging exchanges and cooperation through partnerships with technology expert groups and educational establishments,
- The social engagement of its employees,
- Local initiatives for public or community events.

In addition, in all public communications, the group undertakes to communicate information honestly, responsibly, accurately, appropriately and in a comprehensible manner. This commitment also applies to publications appearing on social networks.

5.2. Environment

SII group's actions respect the natural environment of the countries where it operates. All SII employees and, more especially, those in charge of environmental issues undertake to:

- Apply the regulations in force,
- Identify new environmental risks and take appropriate measures to prevent and mitigate their impacts.
- Manage energy and paper consumption.
- Adopt a responsible purchasing approach.
- Promote the circular economy by setting up certified waste recycling systems by installing recycling points at its premises,
- Use environmentally friendly recycling and disposal methods for computer equipment,
- Implement low-carbon solutions for business travel and commuting.

All those engagements are described in SII's Environmental Charter: S4-0870-01.

5.3. Human Rights

As a global organization, SII Group is committed to upholding the highest standards of human rights across all regions in which we operate. We strictly prohibit any form of child labour, modern slavery, forced labour, and human trafficking within our operations and supply chain.

In addition, SII Group recognises:

- The Universal Declaration of Human Rights;
- The conventions of the International Labour Organization, particularly regarding the prohibition of child labour and forced labour, as well as any degrading or inhumane treatment;
- The principles of the United Nations Global Compact;
- The Guiding Principles on Business and Human Rights, specifically principles: 11, 12, 13, 14, 15, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31.
- Respect for privacy and freedom of association.
- The fight against discrimination and professional equality, particularly through:
 - Raising awareness and training managers and human resources involved in recruitment, training, and monitoring employees on issues of non-discrimination and diversity,
 - Considering the diversity of the society in each country,
 - Internally communicating the company's commitments to non-discrimination and diversity,
 - Integrating non-discrimination, diversity, and professional equality objectives into dialogue with employee representative bodies,
 - Including in the social report and progress updates the agreements, actions implemented, and results concerning diversity and professional equality. All these elements are shared with the employee representative bodies.

5.3.1. Child Labour

SII Group does not tolerate the employment of individuals below the legal working age in any country or jurisdiction in which we operate. We adhere strictly to local and international labour laws, including those set forth by the International Labour Organization (ILO). We expect all our partners and suppliers to comply with these standards. In case of any identified violation,

immediate action will be taken to remove the child from the work environment, while ensuring access to education and support services for their well-being.

5.3.2. Modern Slavery and Forced Labour

SII Group is committed to eradicating all forms of modern slavery and forced labour, including practices such as debt bondage, coercive labour, and other exploitative conditions. Our policies are aligned with the Modern Slavery Act and international human rights standards, ensuring that all workers are employed voluntarily and are free to leave their employment at any time.

5.3.3. Human Trafficking

SII group condemns all forms of human trafficking and is dedicated to preventing the exploitation of people for labour or services. We hold ourselves and our partners accountable to ensure that no practices related to trafficking occur within our supply chains.

By adhering to these principles, SII Group reaffirms its dedication to protecting human rights and promoting ethical business practices globally.

6. GOVERNANCE OF ETHICAL ISSUES AND REPORTING OF NON-ETHICAL INCIDENTS

6.1. Ethics committee

An Ethics Committee is responsible for dealing with ethical issues, especially business ethics, within SII Group.

Ethics Committee regularly reviews the application of this Charter and ethical practices within SII Group.

It monitors any regulatory and legal changes. At its own initiative or on request, it informs all entities of SII Group of the values and the implementation of the principles set out in this Charter. Under conditions ensuring confidentiality, it examines reported non-ethical issues submitted to it by internal (SII employees and their line managers) and external (partners, subcontractors, suppliers and clients) stakeholders.

6.2. Reporting non-ethical incidents

Each collaborator and stakeholder in general can express their doubts and/or ask questions to the members of SII Ethics Committee via the reporting system that constitutes the alert platform accessible from the intranet and the institutional website:

- If they are confronted with a risk of corruption;
- If they believe in good faith that a violation of this Ethics Charter has been or is being or may be committed;
- If they discover that someone is being retaliated against for making a good faith report.

Direct hierarchical superiors are also available to listen.

SII group undertakes to:

- take all declarations into account;
- investigate alerts promptly;
- evaluate facts objectively and impartially;
- take corrective measures and appropriate disciplinary sanctions.

The platform is available here: <https://sii.integrityline.org/>