



Code of Conduct

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1. APPLICABILITY AND DISTRIBUTION

This Code of Conduct applies to all employees of the SII Group, regardless of their status or position within the organisation.

The Code of Conduct supplements the Internal Regulations and the Ethical Charter of the SII Group but does not under any circumstances replace these regulations.

Several channels are used to communicate and raise awareness of good conduct rules. This code is:

- Handed to all new employees,
- Available on both the SII Intranet and on the institutional website of the SII Group,
- Conveyed through awareness raising campaigns and digital communications by the means of e-learning and educational quizzes.



2. CONDUCT OF EMPLOYEES

Our employees should act with integrity, respect, objectivity, professionalism and a sense of responsibility. They undertake to:

- Focus on excellence,
- Respect confidentiality,
- Treat SII assets with respect,
- Respect the rules of usage and management guidelines relating to quality, security and the environment,
- Respect a duty of discretion.

Under the scope of their missions, employees may not act or conduct themselves in an unprofessional manner that harms the interests or reputation of the SII Group, or that of a client or supplier.

Punishable non-professional actions include:

- Aggressive actions or language,
- Repeatedly offensive or rude remarks,
- Inappropriate gestures.

As indicated in the Internal Regulations and the Ethical Charter¹, employees may not sexually or morally harass or commit violent actions or any other degrading behaviour vis-à-vis their colleagues.

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

This relates to inappropriate threatening, intimidating or forceful behaviour, such as:

- Mockery and verbal insults,
- Negative stereotypes,
- Sexist acts,
- Sexual advances.

In addition, employees shall not carry out any non-compliant actions or become involved in acts of corruption².

SII employees are respected by the Group and are required to share common values. Consequently, each employee shall benefit from inalienable rights such as:

- healthy and safe working conditions,
- integrity, dignity and respect regardless of the hierarchical level,
- respect for private life and, in particular, the protection of personal data,

¹ The Internal Regulations and Ethical Charter are accessed via the SII Corporate Repository.

² The Anti-Corruption Code of conduct can be accessed via the SII Corporate Repository.



- benefiting from an appropriate balance between professional life and private life,
- freedom of association and freedom to join a union, as well as collective bargaining rights.

Protection of the assets of SII:

Assets refer to intellectual property rights, equipment and goods, financial resources as well as all media connected to the activities of the SII Group.

- Assets are supplied to serve the interests of the company. They may not be used for personal business, for illegal or political purposes or for any other purpose that could affect the SII Group.
- Employees are made aware that they should protect the goods entrusted to them and should do their utmost to guarantee they are kept safe, and this applies to both physical and virtual assets.
- Each employee should make appropriate use and strive to preserve the hardware and software resources placed at their disposal.
- In this context, all employees should read and approve the Information Technology Charter³ given to them when they join the SII Group.

3. CONDUCT OF MANAGERS

Managers must contribute to creating an ethical professional environment to encourage their colleagues. They must:

- set an example and respect the rules of conduct stipulated above,
- provide a positive environment for their colleagues to allow them to perform their activities,
- oversee their physical and psychological well-being,
- regularly monitor the activities entrusted,
- answer and make themselves available to respond to their requests,
- play a discretionary listening role and only pass on to their line managers the information required,
- value the work carried out,
- deal with problems and explain the decisions taken.

4. CONDUCT VIS-À-VIS CLIENTS

Employees shall ensure they respect the principles of loyalty, integrity and objectivity in their relations with clients.

³ The Information Technology Charter can be accessed via the SII Corporate Repository.



They undertake to promote exchanges based on trust and honesty and guarantee data confidentiality.

Employees must not request or accept gifts or incentives whose purpose is to obtain an undue advantage or influence a decision (money, hospitality, entertainment, travel, services, etc.). Accordingly, employees are obliged to respect the SII gift policy⁴ applicable in the country.

When negotiating contracts with third parties, they should take appropriate measures to guarantee the accuracy of the information conveyed.

They should also ensure the relevance of the technical, commercial and legal aspects related to the contract before committing the SII Group.

An anti-corruption code of conduct is available to employees. It aims to present the basic rules and principles which must inform everyone's decisions in order to be able to face potentially risky situations.

5. CONDUCT VIS-A-VIS SUPPLIERS AND SUBCONTRACTORS

Employees shall ensure they respect the principles of loyalty, integrity and objectivity in their relations with suppliers and subcontractors.

They should take into account the interests of all parties, in relation to the respect of fair contractual terms.

To comply with the principles of the UN Global Compact and the fundamental conventions of the International Labour Organisation (ILO), employees undertake to apply the Responsible Purchasing Charter⁵ vis-à-vis suppliers.

Employees must not request or accept gifts or incentives whose purpose is to obtain an undue advantage or influence a decision (money, hospitality, entertainment, travel, services, etc.). Accordingly, employees are obliged to respect the SII gift policy applicable in the country.

The objective is to promote good practice. This relates to respecting Human Rights, employment standards, protecting the environment and fighting against corruption.

The relevant employees of the SII group undertake to:

- Guarantee the confidentiality of data,
- Treat his interlocutors with honesty and respect,
- Select companies impartially according to predefined and transparent criteria.

An anti-corruption code of conduct is available to employees. It aims to present the basic rules and principles which must inform everyone's decisions in order to be able to face potentially risky situations.

⁴ The SII gift policy can be accessed via the SII Corporate Repository.

⁵ The Responsible Purchasing Charter can be accessed via the SII Corporate Repository.



6. REPORT

Each employee can express his doubts and/or ask questions to the members of the SII Ethics Committee via the alert system provided by the alert platform accessible from the intranet and the institutional website:

- If they are faced with a risk of corruption;
- If it believes in good faith that a violation of this Code has been or is being or may be committed;
- If it discovers that someone is being retaliated against for making a report in good faith.

Direct supervisors are also listening.

The SII Group is committed to:

- take all reports into account;
- investigate alerts diligently;
- evaluate the facts objectively and impartially;
- take appropriate corrective action and disciplinary sanctions.