



# CODE OF CONDUCT



# Integrity: the foundation of our actions



Our proudest achievement is the creation of over 117,000 jobs in 27 countries.

The Group's success requires each and every one of us to commit to the ethical and social principles that guide our day-to-day conduct. These principles aim to satisfy our customers, safeguard our employees' health and well-being at work, foster exemplary relationships with our partners, and protect the environment.

This updated version of our Code of Conduct reinforces our commitments and provides clarity on the ethical requirements pertaining to our activities. It is important for all of us, individually and collectively, to accurately identify acceptable and prohibited behaviours.

We are often confronted with ethical questions. This code is not intended to address all risk situations, but it does offer valuable guidance on how to avoid them. We have developed a risk map to effectively illustrate the best practices, which are quite often just common sense!

Moreover, our Code of Conduct forms a fundamental pillar of our anti-corruption policy. Our contribution to the greater good is grounded in a practical approach, considering the activities of the Samsic Group both in France and internationally.

To address any potential or actual violations of our principles, we have set up a whistleblowing system to investigate and resolve such matters.

This Code applies to everyone committed to growing the Samsic Group and protecting our reputation. We place particular trust in our managers to promote and uphold the Code of Conduct to ensure that every one of us behaves ethically and professionally in all circumstances.

In our business relationships, we also require our partners to adhere to our ethical principles.

**Thierry GEFROY**  
President of the Samsic Group



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■ Integrity of  
the **working**  
**environment**

01

# 01. Integrity of the **working environment**

## 1.1 Respect for Human Rights

**Human rights, as universal values,** provide a fundamental framework that the Samsic Group intends to promote and respect through:

- the Universal Declaration of Human Rights of 10 December 1948,
- the United Nations Guiding Principles on Business and Human Rights of 16 June 2011,
- the Principles set out in the Fundamental Conventions of the International Labour Organisation
- the Principles of the United Nations Global Compact.

Operating across many countries, the Group demands **decent working conditions** for its employees. We are committed to combating forced, compulsory, illegal and undeclared labour. We prohibit child labour.

## 1.2 Health and safety

**Health and safety at work is everyone's responsibility.**

All Samsic employees and partners have the right to work in a healthy and safe working environment; we rely on a preventive approach aimed at:

- reducing risks through training and awareness-raising in conjunction with human resources,
- protecting the physical and mental health of our employees.

Accordingly, each employee must be aware of what to do if there is an emergency in the workplace: ensure that his or her actions do not entail any risk to the life and health of others; immediately report to his or her manager any accident, however minor, as well as any behaviour, installation or situation likely to compromise the safety of the working environment.

### 1.3 Employee well-being and the fight against harassment

#### **Physical and moral integrity are fundamental to the way we work.**

Any acts or deeds that run counter to this principle will not be tolerated and will be punished. Our managers play a primary role in ensuring that this principle is upheld.

Any behaviour that runs counter to human dignity and respect for others is prohibited: harassment; disrespect; disparagement; inappropriate gestures or gestures of a discriminatory, racist or sexual nature; actions or gestures intended to morally wound, offend, humiliate or intimidate others; encouraging physical and/or social isolation, etc.

All unwelcome sexual advances are also inadmissible: unwelcome physical contact; emails, looks or other gestures, comments, invitations or solicitations of a sexual nature; the distribution or display of documents, objects or other items of a sexual nature; acts of a sexual nature carried out as a condition for promotion or employment.

### 1.4 Diversity and inclusion of people with disabilities

**The Samsic Group promotes equal opportunities and diversity.** We take action to combat favouritism by applying a skills-based recruitment policy.

In addition, we have a fundamental commitment to supporting people with disabilities on a daily basis, with a view to their integration into an ordinary working environment. We are convinced that such diversity is beneficial for all our employees. In this respect, the Group carries out various training initiatives aimed at our managers to address this major issue. Strong partnerships have also been forged with organisations dedicated to promoting sustainable employment for people with disabilities. To find out more, please see our CSR report.







**Business**  
integrity

2021

# 02. Business integrity

## 2.1 Fair competition

**All stakeholders in an industry must be respected, including the competition.** It is in everyone's interest to work in a healthy sector with reputable business practices. This helps to build a relationship of trust.

In many countries, there are strict laws governing this area, since certain types of behaviour may be likened to cartels, territory-sharing or other forms of restriction or harm to competition. The Samsic Group makes sure that it is familiar with these laws and complies with them.

For these reasons, our employees must inform their superiors if they receive, even unintentionally, confidential or exclusive information about competitors. New employees are not authorised to communicate to the Samsic Group confidential information about competitors for whom they previously worked.

Any action intended to deprive competitors of commercial outlets or sources of supply is prohibited: contacting our competitors on any confidential matter; inciting our customers or suppliers to breach contracts with our competitors or collecting information on our competitors by illegal or unfair means.

## 2.2 Combating corruption, influence peddling, facilitation payments

### ■ Combating corruption

**The Samsic Group has a zero-tolerance approach to corruption.**

Corruption entails:

- offering or granting something in order to obtain an undue advantage
- asking for, accepting or receiving something in order to provide an undue advantage

For example, corruption (i.e. bribery) occurs when a supplier promises or gives an undue advantage in exchange for confidential information during a tender procedure.



## ■ Influence peddling

**The Samsic Group does not tolerate influence peddling.**

Influence peddling is the act of soliciting or accepting, directly or indirectly, an undue advantage in order to abuse one's influence with a view to obtaining a decision, a favourable opinion or an undue advantage from a public authority or government department.

## ■ Facilitation payments

A "facilitation payment" is a prohibited form of corruption. It is an unofficial payment made to a public official in order to obtain or speed up the completion of routine administrative formalities.

In the course of our business, we have dealings with public officials. Our employees must apply the principles of integrity, fairness and transparency in their business dealings.



# Gifts and invitations

Business gifts, entertainment or other benefits aimed at nurturing strong working relationships **may be appropriate provided that they are in no way attempts to obtain preferential treatment** and do not cast doubt over your ability to exercise independent judgement in the best interests of the Samsic Group.

*For example, an occasional business dinner or the offer of a ticket to a sporting event does not raise any particular difficulties, provided that it is customary and appropriate in the circumstances. However, they must not exceed a reasonable amount.*

In all circumstances, we should apply common sense: if in doubt, our employees are encouraged to discuss the situation with their line manager.

## DOs & DON'Ts

- ✔ Do **refuse and do not offer gifts** of a monetary nature
- ✔ Do **declare large gifts in kind** to your line manager
- ✔ Do **check that donations to charitable organisations are made to organisations whose objectives chime with the values of the Samsic Group** and that they are made **transparently**, without making payments in cash or into private bank accounts.



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These **risk situations** have been identified on the basis of our **risk map**.”

# Choosing third parties for sales and purchases



The Samsic Group seeks to **establish and maintain sound and transparent relationships** with third parties (customers, suppliers, partners, etc.) in terms of sales and purchases.

We are particularly committed to exercising complete oversight over our value chain, and will regularly assess our partners against ethical, environmental and social criteria.



These **risk situations**

have been identified on the basis of our **risk map.**



## DOs & DON'Ts

- ✓ Do **implement a strategy of diversifying customers and suppliers** to avoid economic dependence
- ✓ Do **notify your supervisors in the event of pressure** from third parties
- ✓ Do **inform your manager of any personal or family links** you may have with a third party in relation with the Samsic Group
- ✓ Do **establish official contracts** for all operations
- ✓ Do **perform an audit in the event of the acquisition of a company**, analysing the risks of the transaction and carrying out due diligence checks



# Intermediaries and kickbacks

Commission payments may be considered illegal, particularly when they involve an intermediary. In this context, a kickback consists of a seller offering more commission than necessary, and then recovering part of it for himself via the intermediary.

A number of practices are likely to conceal the collection or payment of a kickback. For example, accepting overpriced purchases from a supplier or agreeing retail prices that are excessive in relation to market prices.



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# International risks

The Samsic Group draws attention to the choice of location for our activities, which may give rise to specific risks of corruption due to geographical location.

## DOs & DON'Ts

- ✔ Do **be aware of customs and practices, and avoid any practices that could be detrimental** to the group or its employees.
- ✔ Do **not carry out any activities in violation of applicable international economic sanctions** or export control laws and regulations.



# Relations with public officials, political, lobbying and trade union activities:




The Samsic Group responds to calls for tender within the framework of public contracts. In this context, transparency and integrity are required. All contributions to political parties, politicians and related institutions are strictly forbidden.

## These risk situations

have been identified  
on the basis of our  
**risk map.**

### DOs & DON'Ts

- Do not promise an advantage in exchange for an action or omission by a public official, for example by giving a public official a sum of money or a valuable gift in order to be selected in a call for tenders
  - Do notify the manager in the event of pressure or solicitation from a public servant,
  - Do declare internally any public elective office or membership of professional associations
  - Do make it clear, when participating in a political activity, that it is not the Samsic Group that is represented, and do not refer to it, for example over social media
  - Do not exert pressure on public decision-makers to promote the Group's economic interests.
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- Do not enter into discussions with representatives of public authorities or political parties concerning local or international regulations, unless expressly authorised to do so by General Management and subject to being registered in the directory of interest representatives
  - Do not use Samsic Group funds and resources to conduct or support personal political activities, or to engage in workplace politics
  - Do not promise any compensation or advantage to a public decision-maker
  - Do not exert any pressure on staff representatives or trade union bodies that might hinder their independence



# Sponsorship and philanthropy

Our employees must be vigilant about commendable operations such as sponsoring and philanthropy, since these operations may be used as a pretext for corruption.

- **Sponsorship** refers to financial or material support given to an event or individual by a benefactor in exchange for publicity (dissemination of the name, brand or message).
- **Philanthropy** consists of making a donation to support a work of general interest, without any direct compensation.

## DOs & DON'Ts

- ☑ Do make all donations, philanthropy and sponsorship transparent
- ☑ Do not finance works that indirectly benefit political figures, public officials or their close relations
- ☑ Do not promote or carry out philanthropy or sponsorship operations aimed at influencing a decision in the award of new contracts or securing the granting of undue advantages
- ☑ Do share our values with our partners



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**risk situations**  
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## 2.3 Transparency of accounts

**Providing transparent, accurate and reliable information is essential.**

Our employees have a duty to ensure that all information contained in accounting, financial or related documents is accurate. Such verification is essential for conducting honest, efficient and lawful business.

Documentation must be stored securely in accordance with archiving instructions. In the event of an error being discovered, the Samsic Group must be informed of any inaccurate information. All errors should be brought to our attention.

## 2.4 Combating money laundering

**and complying with international economic sanctions**

**Our employees must follow internal verification procedures to combat the laundering of funds derived from criminal activities.**

Cash transactions must not be accepted unless no other means of payment is available and only up to the amount authorised by law, after having been expressly authorised and properly recorded and documented.

**The Samsic Group pays particular attention to the economic and financial restrictions applicable in certain geographical areas.** These may be individual measures such as freezing assets or embargoes imposed on certain countries. Our employees must comply with economic sanctions imposed by European or international institutions.







■ Integrity of  
**individual  
behaviour**

03

# 03. Integrity of individual behaviour

## 3.1 Preventing conflicts of interest

**Our employees must always put the interests of the Samsic Group first and guard against any conflict of interest.**

There is a real or potential conflict of interest when an employee is involved in personal activities or relationships likely to influence the independent and objective performance of his or her duties. The mere appearance of a conflict of interest or the concealment of information in this regard is likely to damage the reputation of the Group and its employees. Any high-risk situation should therefore be reported to line managers for analysis and action.

### Examples:

- 1 · maintaining commercial relations on behalf of the Samsic Group with a company controlled by an employee's close relations
- 2 · entering into a personal relationship with a competitor, customer, supplier or partner of the Samsic Group

## 3.2 Protection of assets

**Preserving and protecting the necessary resources for achieving the Samsic Group's economic objectives is essential.**

These resources are our assets: their misuse and waste are detrimental to operational and financial performance. This is why our employees must prevent our resources from being lost, damaged, misused, wasted, loaned, transferred or given away without permission. It is also important to protect the Group's intellectual property and know-how.

Similarly, information systems and their tools must be used appropriately in the professional context. The use of resources for private purposes, such as email, telephone or the Internet, is tolerated as long as it is limited, does not entail unreasonable costs and does not interfere with professional activity.

### 3.3 Protection of confidential information

#### **Information and data are of considerable value to the Samsic Group.**

Accordingly, everyone must ensure the protection of confidential information to prevent its disclosure outside the Group. Such information must only be communicated on a need-to-know basis, in the interest of the Samsic Group. Before sharing any internal information with an outside party, we encourage you to check that this information can be communicated and, if necessary, to enter into appropriate non-disclosure agreements. Confidential customer and partner data must be stored securely, irrespective of the format, whether as a hard copy or on an electronic device.

Our employees must not discuss or work on internal information in public places, particularly where conversations may be overheard and data security compromised. Similarly, internal information should not be kept by employees at home on private devices.

Finally, relations with certain external parties such as the media or the authorities are managed exclusively by managers specially appointed for this purpose. In our social media activities, everyone must ensure that there is no confusion between their personal opinions and the group's position.

### 3.4 Personal data protection

**The Samsic Group undertakes to comply with the regulations applicable to the protection of personal data,** in particular the General Data Protection Regulation (GDPR), as well as any legislation specific to each country.

Our employees who are authorised to access data must process personal data with the utmost care. If our employees need to transfer personal data outside the country in which it was collected, they should seek advice before doing so.

As an employer, the Samsic Group is committed to respecting employee data. Employees are bound by an obligation of confidentiality when processing the personal data of Group employees to which they have access in the course of their duties.



■ **Environmental  
and Social  
Commitment**

04

# O4. Environmental and Social Commitment

**Our goal: to build a genuine corporate social responsibility project that serves our ambition to create a positive, shared and virtuous value-add for our planet.**

We are committed to the Sustainable Development Goals and strive daily towards developing our company in the best possible way to support the ecological and social transition.

Through our activities, we contribute specifically to making our surroundings cleaner and safer, but also to reducing inequalities, supporting the development and well-being of as many individuals as possible.

Our Corporate Social Responsibility program "Samsic Planet 2030" covers 13 commitments and was launched across all our branches and territories, with a view to providing our clients and employees with eco-friendly services and workplaces.

In all the company's decisions, whether strategic, operational or day-to-day, everyone must take account of our social responsibility objectives and priorities.

We also base our extra-financial performance on environmental, social and governance (ESG) indicators defined at Group level and applied to all our activities.

## 4.1 Environmental Commitment

**We see our environmental performance to be a key lever in the success of our CSR policy.**

In 2023, the Group launched its Low Carbon Trajectory project, with the aim of helping to safeguard the planet under sustainable climate conditions and limiting the social, economic, sanitary and environmental consequences weighing on the society and individuals.

The aim is clear: to bring employees and all our branches on board to ensure that set objectives are met; we all must "do our bit".

The Samsic Group's activities have a direct impact on the environment and biodiversity: whether it be in our commutes to work or on business travel, in every purchase we make and in every service provided to our clients. The environmental impact generated in the workplace and in the course of our daily activities is something we are all responsible for, even if we don't always realise it. It is therefore up to each and every one of us to make every effort to reduce and limit this impact. Even the smallest eco-friendly action counts.

This is why we encourage everyone to reflect on how their everyday habits can affect the environment and biodiversity, regardless of the sector of activity. We focus on ways to help minimise our impact, for example by limiting our travel, saving energy and water, and preventing waste production.

However, when we cannot avoid certain actions that do have negative impacts for the environment and biodiversity, it is then crucial to find appropriate solutions to lessen their effects. For example, in the case of waste production, it is imperative to ensure that it is properly sorted and recycled.

## 4.2 Social Commitment

**The Samsic Group encourages contribution to the Sustainable Development Goals among its stakeholders and within all spheres of influence.**

The growth of our activities and services intrinsically drives us to widen our territorial footprint and participate in the development of the territories in which we operate.

We are committed to having a positive impact on local communities by supporting and developing civic and charitable projects that meet the needs of the people and society as a whole. Key aspects of this commitment include encouraging solidarity, helping the most vulnerable people into work and education, supporting scientific and medical research, promoting sporting values and the arts.

Over the years, we have continually renewed our support for such initiatives, while also encouraging our employees to get involved.

To find out more about our Environmental and Social commitments, we invite you to take a look at our CSR Report.



# Compliance and whistleblowing system

**This code of conduct applies uniformly throughout the Samsic Group.**

It replaces any existing code of conduct within the Group. The internal policies of each entity must comply with this Code. Whichever entity we work in, for each new activity we undertake, we must ask ourselves whether it is permitted by the regulations and whether it complies with the code of conduct.

Any employee whose behaviour does not comply with this code of conduct may be subject to disciplinary action. Any action considered to be wrongful may, depending on its seriousness, be subject to one or other of the following sanctions in order of seriousness:

- Written comment;
- Warning;
- Reprimand;
- Layoff;
- Disciplinary transfer;
- Demotion;
- Dismissal for misconduct;
- Dismissal for serious misconduct, without notice or severance pay;
- Dismissal for gross negligence, without notice or severance pay.

Moreover, in the most serious cases, such as corruption or influence peddling, legal proceedings may be initiated. If you have any questions about the application of this code of conduct at work, you can contact your line manager and, depending on the subject, Human Resources, the Legal Compliance Department or the CSR Department.

The Samsic Group has a whistleblowing system.

To find out more about our whistleblowing system, please refer to **Appendix 1** "The Samsic Group's whistleblowing system".



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## Appendix 1

# **Samsic group whistleblowing system**

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Any person working within the Samsic Group or outside the Group who is aware of or suspects in good faith any behaviour that is unlawful or contrary to this Code of Conduct or to any international or local regulations may make a report in complete confidentiality, by contacting the ethics line at [alert@samsic.com](mailto:alert@samsic.com)

Retaliation against whistleblowers will not be tolerated, and whistleblower reports will be handled by qualified staff who are required to keep all related information strictly confidential.

The Samsic Group will handle reports by conducting the necessary investigations in a confidential manner, in compliance with the laws, regulations and procedures applicable to each country.



