



SFEH Group 's commitments in terms of ethical, social, and environmental responsibility

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INTRODUCTION

Aware of the societal and environmental responsibilities of economic players, the SFEH Group, in addition to its demand for quality in the services it provides, strives to conduct its business in an ethical, sustainable, and responsible manner.

Its commitment to carrying out highly technical projects to the satisfaction of its customers, and to implementing an exemplary CSR policy is its central concern.

This is why the SFEH Group strives daily to adopt sustainable practices that contribute to societal progress, while respecting the values it wishes to promote:

- **Integrity**
- **Conscience**
- **Rigor and Professionalism**

The aim of this charter is to raise all Group employee's awareness about the issues so that they can ensure their proper application in the performance of their activities.

It complies with the fundamental principles of the main international bodies (Universal Declaration of Human Rights, International Labor Organization, OECD, IFC) and complements the company's internal regulations.

It does not replace the laws or regulations applicable in the countries where the Group companies operate.

(NB: In case of difficulty in understanding this document, the employee is invited to approach his line Manager).

Ethical responsibility

The group is committed to the highest standards of integrity and ethics in business practices. It puts in place procedures to promote transparency, prevent corruption and respect human rights in all its activities.

Relations with third parties

Employees

The Group is committed to protecting the health and safety of all its employees, and to providing them with a pleasant working environment conducive to their well-being and professional fulfillment.

At the same time, employees are required to comply with the instructions of the internal rules and regulations, particularly regarding health and safety and the proper use of company resources.

They are also required to maintain confidentiality and respect the rules of good conduct, especially:

- Compliance with legality

All Group employees are required to comply with the laws in force in the countries where they carry out their activities, particularly regarding illegal employment and working conditions; as well as to behave ethically, including during temporary trips or assignments abroad.

Furthermore, all employees must refrain from any behavior which, even without violating the law, is likely to damage the company's reputation or prejudice its interests.

- Respect for Human right

The SFEH Group is committed to upholding human rights as recognized in the Universal Declaration of Human Rights of the United Nations

- Respect for people and non-discrimination

Employees undertake to refrain from any behavior related with sexual, psychological, or moral harassment and to behave with respect towards colleagues, superiors, and subordinates.

On the other hand, the Group undertakes to promote working conditions free from any form of harassment, respecting the provisions of the International Labor Organization, by prohibiting any form of employment of minors, and any discrimination based on age, race, color, sex, religion, political opinions, origin, sexual orientation, social origin, or disability.

Suppliers

Each employee undertakes to respect the principles set out in this charter, particularly regarding the fight against corruption.

Employees must therefore ensure fair, impartial, and transparent treatment with suppliers as well as fair and regular competition when awarding contracts.

As the SFEH Group wishes to promote suppliers and partners relationships based on respect and trust in order to establish long-term partnerships, all relations between SFEH Group employees and employees of collaborating entities must be based on mutual respect and collaboration.

The Group selects suppliers and partners who share the same values and commitments.

Clients

Similarly, the SFEH Group is committed to developing its activities and maintaining business relationships with its clients in line with the international principles stated above, particularly in the fight against corruption.

In this context, the Group strives to build long-term relationships based on trust with its clients by providing services that meet their quality requirements.

In addition, the SFEH Group remains cautious to avoid situations that could create any real or potential conflict of interest between its employees and its clients or suppliers, which could compromise the independence or objectivity of their professional behaviors or decisions.

Recommended reading:

*Universal Declaration for Human Rights
International Labor Organization*

Fight against corruption

Corruption refers to the fact of offering, promising, giving, or proposing an undue advantage (money, gift, service, promise, etc.) to a person so that he performs or refrains from performing an act in violation of his professional duties. Soliciting or receiving any advantage under these conditions is also prohibited.

There are two types of offenses: corruption and influence peddling.

- *Corruption:*

Directly or indirectly offering or granting advantages to a decision-maker so that he favors a decision within the scope of his function or mandate.

- *Influence peddling:*

Directly or indirectly offering or granting advantages to a decision-maker, so that he abuses his influence, with the aim of obtaining contracts or any other benefit from an authority or administration.

Rules regarding corruption

The SFEH Group strongly prohibits all the above-mentioned behaviors, wherever it operates.

It is forbidden for all employees or service providers to request, accept, propose, or offer gifts and invitations of any kind, with the aim of encouraging or rewarding any behavior that could violate the applicable anti-corruption rules.

These prohibitions apply even if any of the behaviors mentioned in this charter are not sanctioned by the local law of the country where the act occurred.

Relations with public officials require special vigilance.

When dealing with a third party, the following principles and precautions apply:

- Carrying out the necessary due diligence to ensure the integrity of the provider.
- Supervision of the contractual relationship, precise definition of the tasks assigned and remuneration terms.
- Contractual commitment by the third party to respect the anti-corruption prevention rules.

In case of solicitation, any proposal should be categorically refused.

In case of doubt about a possible solicitation, it is necessary to be cautious and completely transparent by sharing information and consulting his line manager before acting.

Sanctions in case of corruption

The SFEH Group wishes to inform its employees and partners that in the event of failure to comply with any of these prohibitions, the offender will be liable to disciplinary sanctions, in addition to legal sanctions under the law in force.

It is important to underline that in most countries, those involved in the above-mentioned behaviors may face criminal sanctions.

Recommended reading:

OCDE Convention on combating bribery of Foreign Public Officials in international commerce transactions

OCDE Good practice guide for internal controls, ethics, and compliance

Social responsibility

Fight against sexual harassment

The SFEH Group, as part of its commitment to health and safety, is committed to protecting its employees in this area:

- By using this document to raise the employees' awareness about these concepts to enable them to identify situations of sexual harassment in which they may be the victim, witness, or perpetrator.
- By implementing an internal procedure for reporting and handling incidents of sexual harassment.
- By severely punishing any criminal behavior through internal sanctions possibly combined with criminal sanctions.

Definitions

Sexual harassment is a complex concept that covers a multitude of behaviors and can therefore take many different forms.

Sexual harassment

- Severe pressure to perform an act of a sexual nature.

This type of sexual harassment consists of serious pressure, even if not repeated, exerted to obtain an act of a sexual nature, for one's own benefit or the benefit of a third party.

It is relatively easy to identify it is an abuse of authority, like threats or blackmail relating to promotion, dismissal or a change in working conditions.

- Repeated unwanted sexual comments or behaviors.

This refers to repeated sexual comments or behaviors that violate the dignity of an employee because of their degrading or humiliating nature, or because they try to create a situation of intimidation or offense. Therefore, in the name of professional gender equality, various manifestations of everyday sexism in the workplace (sexist comments or jokes; uncivil behavior with sexual connotations; false seduction) may be considered a form of sexual harassment.

Sexual assault

Sexual assault includes all sexual offences committed with violence, coercion, threat, or surprise. It is repressed by criminal law.

How to deal with sexual harassment or assault

It is appropriate to facilitate the reporting and follow-up of any act that could be assimilated to sexual harassment.

Gather the facts

Whatever the source of the report (the victim, a witness, a staff representative...) and the form it takes (mail, oral feedback during an interview, collection of testimonies, ...), it must be promptly and formally forwarded to an employer representative for analysis.

Proceed with the analysis of the gathered elements.

- If it is a clear case of sexist behavior, at a minimum, a warning reminding the rules should be given to the perpetrator. A disciplinary sanction may be considered depending on the seriousness and/or repetitive nature of the behavior.
- If there is suspicion of a sexual harassment, an internal investigation will be conducted to establish the veracity of the facts. It must be carried out internally and confidentially. Its conclusions will be written in a report that will define the level of disciplinary sanctions, graded according to the severity of the facts.
- If the investigation unequivocally confirms a sexual assault, a disciplinary sanction will be immediately taken against the perpetrator and a report to the judicial authorities will be sent. A possible precautionary dismissal of the accused employee can be considered if its presence in the company may generate a risk of physical or mental health for the victim or other employees.

Development contribution

The SFEH Group is mainly involved in infrastructure projects in the fields of healthcare, agroindustry, and education.

With a strong presence in Africa, SFEH contributes to both economic and social development, placing great emphasis on the impact of its projects on local populations.

In addition to carrying out its projects, the Group takes part in local social initiatives, which can take various forms:

- Supply of equipment
- Water purification (wells, toilets, etc.)
- Building rehabilitation
- Training
- ...

To ensure the success of its initiatives, the Group works closely with local associations and businesses. By partnering with local players who have in-depth knowledge of local needs and realities, SFEH Group can implement projects that have a truly positive impact on communities. It firmly believes in the importance of stakeholder involvement and participation to ensure the effectiveness and sustainability of its actions.

Environmental responsibility

This chapter illustrates the SFEH Group's commitment to social and environmental responsibility, and its determination to adopt responsible practices to protect the environment and reduce its carbon footprint.

Externally

The SFEH Group is committed to respecting the international recommendations established by renowned organizations such as the World Bank, IFC (International Finance Corporation) and the Equator Principles. He is convinced that transparency, compliance with local regulations and international standards are essential to ensure responsible and sustainable development.

For each of its projects, the SFEH Group conducts in-depth environmental and social impact studies, carried out by independent and specialized firms. These studies make it possible to assess the impact of its activities on the environment and ensure strict compliance with international standards and standards for environmental protection and sustainable development.

Furthermore, the SFEH Group strives to work only with service providers who share a similar approach.

Internally

In terms of environmental matters, the SFEH Group is committed to adopting responsible practices to reduce the carbon emissions of its business.

It has invited its employees to participate in awareness-raising workshops. Internal rules have then been established to reduce the carbon footprint, in terms of energy sobriety and waste management and recycling.

Monthly monitoring indicators to measure consumption are reported within a continuous improvement process.

Recommended reading:
IFC Performance Standards
Equator Principles