



# ETHICS CHARTER

“Ensuring business ethics are central to responsible growth”

*This Ethics Charter was approved for the first time by the Board of Directors of SFA in July 2017, reconfirmed by the CSR Committee of the SFA Group in July 2021 and updated on 3 November 2022.*



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# CEO LETTER

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Dear Readers,

We have a very clear policy: zero tolerance, especially towards discrimination and harassment, fraud and corruption, and full commitment to respect the ethical rules in the countries where we operate and those we impose on ourselves.

This requires every employee to take seriously their role in building and protecting the Group's reputation by acting in full compliance with applicable laws and our values and ethics, in all our activities.

This Ethical Charter is a formal expression of the SFA Group's fundamental ethical principles. As we continue to grow and new employees join our organisation each year, a written statement of these principles, which are generally accepted and already in force in our organisation, is necessary.

SFA Group's Ethics Charter applies to each and every employee regardless of his or her department or level of responsibility. It is intended to guide the way each and every one of us behaves and acts every day.



**ARNAUD CORBIER**  
CHIEF EXECUTIVE OFFICER

This Ethics Charter also serves as a reference guide for our customers and partners across the globe.

Every one of us together - as employee or partners - let us stand as guarantors of the SFA Group commitments respect and integrity by integrating and enacting this Ethics Charter in every circumstance we encounter.

I know I can count on you to embrace it and bring it to life day after day to realise our vision of sustainable growth for all of us. I thank each and every one of you for this commitment.

## PREAMBLE

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The prosperity and sustainable development of the SFA Group are based on the confidence placed in the company by **its employees, customers, suppliers and partners.**

### Purpose of this Ethics Charter

The Ethics Charter reasserts the SFA Group's collective commitment to instil and develop this confidence. Its goal is to allow each individual, in his or her daily activities, to embrace the fundamental values upheld by its managers and employees: Inventiveness, Quality, Reliability & Trust, Loyalty & Simplicity, Comfort and Ease.

**Respecting these values will thus help enhance the Group's positive reputation and its performance.**

This Ethics Charter does not claim to cover every situation from which an ethical issue may arise. If a situation arises that is not specifically referred to herein, it is the responsibility of each employee to make the right decision and adopt the appropriate ethical conduct. Employees shall rely on their good judgment, sense of responsibility and principles referred to in this Ethics Charter.

The Ethics Charter may have to evolve and be supplemented or amended in the future, according to needs.

Each of the entities belonging to SFA Group may, where appropriate, adopt specific provisions that are stricter, pursuant to the legal or regulatory obligations applicable at the local level.

The Ethics Charter defines the moral principles or standards of behaviour. It does not therefore replace the legal standards set out in applicable laws or regulations, and company contracts and policies.

### Scope of this Ethics Charter:

The Ethics Charter applies to all SFA Group entities.

The Ethics Charter concerns all employees of SFA Group, irrespective of their position in the line of command, irrespective of their status, and irrespective of the country in which they are employed.

## OUR COMMITMENTS

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**SFA Group is an industrial group with a worldwide presence, whose primary purpose is simple: to design and manufacturer home and professional solutions wherever water flows.**

Our ambition is to continue GROWING TOGETHER with all our partners and stakeholders (all those who participate in economic life, those who observe the company, and those whom it influences more or less directly), in a common approach of development and permanent progress.

### Commitment to Respect

guides our relations with all our stakeholders and must be a permanent part of our business activities and relationships. Recognition of individual difference must be taken into consideration and go beyond minimum observance of laws and regulations.

Respect is central to human interaction, not only within SFA Group and towards our customers, but also in our social and societal environments.

We respect individuals and their right to privacy.  
As such, SFA Group undertakes

not to discriminate for any reason whatsoever in working relationships and in particular:

- not to discriminate against persons on the grounds of gender or age, racial, social, cultural or national origin, union activity, sexual preference, disability, political opinion or religion;

- to recruit new hires and promote employees on the basis of exclusively professional criteria, according to their specific qualities and treat them with dignity, without favouritism and with due respect to their private life

### Commitment to Integrity

leads us to strictly observe our duty of honesty in our business dealings. It requires us all, and Management in particular, to individually set an example when carrying out our duties towards our customers, our colleagues, and all other stakeholders.



## Commitment to Quality

consists in providing our customers with quality service. Quality applies to every line of business and everyone plays a part and contributes to achieving this objective. Our ambition is to be acknowledged and endorsed by all our stakeholders by growing together.

## The Team spirit

that inspires us encompasses solidarity and cooperation. It means we can combine the best skills for the benefit of our customers and stakeholders, and together overcome the challenges facing us now and in the future.

Our action and conduct principles are in line with fundamental principles, such as those of the Universal Declaration of Human Rights, the Modern Slavery Act and those set out by the International Labour Organisation (in particular those regarding the ban on child and forced labour).

## EMPLOYEES

The SFA Group undertakes to

- put in place the necessary measures to avoid any situation of discrimination and harassment.
- ensures that the actions of its employees comply with the law, respect the rules of confidentiality and do not present any risk of corruption, conflict of interest or abuse of corporate assets.
- provide its employees with the necessary conditions to guarantee their health and safety at work and promotes the corresponding preventive training
- promote the professional development of its employees by ensuring that their tasks are enriched, that they are given the opportunity to improve their skills through appropriate training, that their careers evolve and that they are involved in the life of the company.
- comply with laws and regulations relating to the protection of employees' personal data

## CUSTOMERS

Customer confidence in the SFA Group's business and products is one of the company's most important concerns.

The confidence of customers is acquired and maintained, in particular, through stringent respect for their rights, preservation of their interests and a constant concern to undertake only those commitments that can be upheld and respected. The SFA Group

- takes into account the needs of consumers by providing them with sanitary comfort solutions that meet their immediate and future needs.
- provides its customers with the technical information they need to develop their business, particularly with regard to the objective performance of products.
- complies with their commercial rules of the game in the relationship it maintains with its suppliers and customers and refrains from any practice that could distort the natural play of free competition. In particular, it rejects any favouritism or any risk of corruption.
- provides clients with commercial promotion actions to support their development, taking into account the legal constraints specific to each country.
- complies with laws and regulations relating to the protection of customers' personal data



## SUPPLIERS

The SFA Group considers its suppliers to be an integral part of the company's value generation process, working in partnership with the same over the long term. The selection of Suppliers is not only based on convenience, but also pays particular attention to the quality of service and compliance with evaluation criteria aimed at promoting social and environmental responsibility throughout the supply chain. In this context, SFA Group undertakes to raise the awareness of suppliers to ensure they fully respect the rights of the people they work with, manage their companies transparently and sustainably and seek to reduce the environmental impact of their business.

- 💧 The SFA Group selects its suppliers on the basis of :
  - 💧 Performance and Competitiveness of their products
  - 💧 Quality of their Services and their ability to ensure their sustainability.
  - 💧 The level of exclusivity required according to the strategic nature of the product or service
- 💧 SFA Group guarantees transparency, impartiality and fairness of treatment in the consultations and in the awarding of its contracts; it bases its selection on an objective evaluation of suppliers, prices and the ability to provide the quality of the products purchased.
- 💧 SFA Group subsidiaries implement appropriate selection and evaluation procedures for their suppliers and subcontractors that meet these requirements.
- 💧 SFA Group develops partnership relationships with its suppliers that include confidentiality or even non-competition clauses, enabling each party to protect its interests.
- 💧 SFA Group departments concerned by the purchase of products and services will establish:
  - 💧 Calls for tenders
  - 💧 Benchmark Terms and Conditions
  - 💧 Systematic competitive bidding to find the best overall supplier with several quotes
  - 💧 Rules for renegotiating contracts
- 💧 SFA Group undertakes to comply with laws and regulations relating to the protection of personal data

## COMPETITORS

The SFA Group supports a fair competition and will restraint from public or face to face criticism of competitors or getting illegal information in business intelligence

- 💧 The Management Departments of SFA Group take particular care to ensure that competition rules are strictly observed in each Country in accordance with their own regulations.
- 💧 If necessary, they may maintain relations with their competitors in strict compliance with antitrust regulations.

## ENVIRONMENT

The SFA Group considers water as an essential world heritage and is therefore limiting its consumption in its products and also its effects on the environment in its own factory

- 💧 SFA Group is part of an active and voluntary approach to environmental preservation. Its ISO 14001 certification at SFA is the criterion that validates this permanent approach.
- 💧 On production sites, SFA Group ensures relations with its local residents to guarantee the preservation of mutual interests.
- 💧 SFA Group ensures that it scrupulously respects the regulations, environments and cultures of the countries in which it operates.



# APPLICATION PROCEDURES

## Where to seek advice

Employees should address any questions regarding the application of the principles defined in this Charter to their line managers; if they deem the information received to be incomplete and unsatisfactory, they may contact the Ethics Committee that has been established to ensure that this charter is communicated and strictly applied.

It is explicitly specified that neither the Ethics Charter nor the possibility to turn to the Human Resources shall create a climate of suspicion or denunciation.

## Compliance with the Ethics Charter:

All employees need to understand and apply the policy principles set out in this Charter of Ethics.

The regulations featured in the Charter of Ethics may not replace national and international laws applicable in each country.

## Implementation of Shared Ethics

The Ethics Charter is aimed at all employees of SFA Group and its subsidiaries. The Ethics Charter is available in various languages. The reference document in France is the French version. The English version is the reference document in all other countries.

Date: 04.11.2022

Signed *arnaud corbier*  
arnaud corbier (Nov 7, 2022 08:57 GMT+1)

Arnaud CORBIER  
CEO



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# SFA GROUP ETHICS COMMITTEE



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FOR ALL INFORMATION ON ETHICS AND COMPLIANCE OR TO REPORT  
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