

# Human Rights Policy

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EMPOWERING PEOPLE - UPHOLDING RIGHTS

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## INTRODUCTION

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The SFA Group's employees are of great value and the key to our success. The Group must strive to provide a workplace where employees can fulfil their potential in an open and inspirational working environment. We must maintain a strong commitment to high standards that deliver a fair, respectable and safe workplace for all employees in the Group.

The **SFA Group Human Rights Policy** (the "Policy") sets out the human rights standards to which all SFA Group employees are entitled, regardless of the country in which they work. The Group subscribes to internationally recognized fundamental principles and texts, especially:

- the Universal Declaration of Human Rights (1948),
- the Convention on the Rights of the Child (1959),
- the International Covenant on Civil and Political Rights (1966) and the International Covenant on Economic, Social and Cultural Rights (1966),
- the Declaration on the Elimination of Violence against Women (1967),
- the ILO Declaration on Fundamental Principles and Rights at Work (2022).

## OBJECTIVE AND SCOPE

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Respect for human rights is a prerequisite for all the Group's activities, and we do not tolerate any violation of these rights, whether in its own activities or those of its suppliers, subcontractors, or partners.

This policy applies to all employees, regardless of their position and contract status: full-time, part-time, casual, permanent or temporary, contract or commission workers, volunteers, and interns. It applies to employees in all their professional relationships with each other, and with customers, suppliers, and prospects.

The SFA Group's commitments also apply in countries that have not ratified these conventions.

## IMPLEMENTATION OF THE POLICY

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SFA Group will take the following measures to ensure the implementation of the Policy:

- Implement human rights training for all employees.
- Integrate human rights principles into corporate decision-making processes.
- Integrate this policy into operational procedures to ensure effective application across all business functions.
- Implement a human rights due diligence process to identify, assess, and prevent potential adverse human rights impacts of its activities. This process includes assessing human rights risks, putting in place appropriate mitigation measures, and setting up monitoring and evaluation mechanisms.



## ROLES AND RESPONSIBILITIES

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### Executive Board :

- Regular review and updating of the policy.

### Group CSR Steering Committee :

- Development and implementation of action plans to achieve set goals.

### Group CSR Committee :

- Drives the implementation of the policy, provides specific advice on labour and human rights issues and dilemmas, and ensures that labour and human rights issues are identified and addressed.
- Audits, reviews, measures, and reports on labour and human rights performance.

### Local CSR Representatives :

- Responsible for sharing policies within their business units, management, employees, and workers of all entities in the SFA Group.
- Responsible for adhering to this policy and complying with the letter and spirit of the policy.
- Conduct training and awareness programs on-site.

## GUIDELINES

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The following paragraphs describe our principles for the identified subjects, on which the SFA Group is particularly vigilant. In the event of a conflict of standards with the laws applicable in the countries in which the Group operates, we comply with local regulations while committing to apply the provisions that best protect human rights.

### ▲ FREEDOM OF EXPRESSION

- 💧 We respect everyone's right to freedom of expression, subject to applicable national and international laws and in accordance with our Code of Conduct.

### ▲ DIGITAL SECURITY - DATA PRIVACY

- 💧 We respect the right to privacy and protect the personal data of our employees, business partners and other stakeholders.
- 💧 We implement appropriate security measures to protect data from theft, misuse, or unauthorized disclosure.
- 💧 We inform our employees of any video surveillance of the workplace, and the reasons for such activity.
  - Cameras are installed at building entrances/exits, emergency exits, traffic lanes, and areas where merchandise or valuables are stored.
  - Only authorized personnel can view recorded images, which are securely accessed only upon an official request.

### ▲ LOCAL COMMUNITY

- 💧 We recognize the rights of Indigenous people and people from local communities where we operate.
- 💧 We are committed to respecting their cultures, traditions, and lands.

## ▲ FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

- 💧 We respect the right of employees to form, join or not join a union, or other organisation of their choice, and to bargain collectively in favour of their common interests without fear of retaliation such as intimidation, harassment, or dismissal.
- 💧 The SFA Group prohibits any act of interference in trade unions and does not discriminate against employees for their trade union activities.

## ▲ CHILD LABOUR

- 💧 We do not tolerate child labour under any circumstances, either directly or indirectly.
- 💧 The minimum age for full-time employment must be 15 years old or the minimum legal age for employment according to the applicable law, whichever is higher. Where the applicable local law is 14 years of age, in accordance with the exceptions for developing countries, this lower age will apply.
- 💧 The SFA Group may authorize the hiring of persons under the age of 18 in internships or vocational training programs organized in partnership with schools and training institutions, and when the competent authorities approve the hiring.
- 💧 The SFA Group does not hire people under the age of 18 for positions requiring dangerous tasks that may jeopardize their physical and mental health, safety, or morals.

## ▲ FORCED LABOUR

- 💧 We do not tolerate any form of forced labour, including servitude, slavery, and human trafficking.
- 💧 Workers must be allowed to move freely within their workplace (except in restricted areas for security or privacy reasons), leave their workplace at the end of their working hours, and terminate their employment on reasonable notice, provided they comply with local regulations.
- 💧 The SFA Group ensures that the intermediaries and recruitment agencies it uses do not adopt practices that could lead to forced or compulsory labour.
- 💧 Employees are under no obligation to pay any money or other monetary consideration to secure employment, either before or during their period of employment.
- 💧 Our employees must receive a contract/letter of employment in a language they understand, specifying working conditions such as salary and hours.
- 💧 We do not retain employees' personal documents (identity cards, passports, etc.).

## ▲ WORKING CONDITIONS

- 💧 We adhere to applicable laws and regulations or the highest industry standards, with respect to minimum compensation, hours of work, overtime, benefits, and other working conditions.
- 💧 In the case of massive redundancy plans, the SFA Group must, at a minimum, comply with applicable laws and industry standards.
- 💧 The SFA Group shall ensure that all employees have the right to sick and annual leave, as well as parental leave for employees who need to care for a newborn or recently adopted child, as provided for by national law. Employees who take such leave should not be dismissed or threatened with dismissal for this reason.

## ▲ NON-DISCRIMINATION AND EQUAL OPPORTUNITIES

- 💧 We do not tolerate any form of discrimination against our employees and business partners.
- 💧 SFA Group is committed to creating a diverse and inclusive work environment where all employees are treated with respect and dignity.



- 💧 We support equal opportunities, committing ourselves that any decision relating to employment, from hiring to dismissal and retirement, must be based solely on legal and non-discriminatory criteria.
- 💧 The SFA Group ensures that the intermediaries and recruitment agencies it uses do not adopt discriminatory practices.

### **SOURCE OF DISCRIMINATION**

- |  |                           |   |
|--|---------------------------|---|
| • Origin   | • Health status           | • Whistleblower status  |
| • Sex  | • Loss of autonomy        | • Capacity as a whistleblower facilitator or person in contact with a whistleblower |
| • Marital status   | • Handicap                | • Spoken language   |
| • Pregnancy  | • Genetic characteristics | • Ethnic group  |
| • Physical appearance  | • Morals                  | • Nation  |
| • Particular vulnerability related to the economic situation | • Sexual preference       | • Alleged breed   |
| • Name   | • Gender identity         | • Religion  |
| • Place of residence   | • Age                     |   |
|  | • Political opinions      |   |
|  | • Union activities        |   |

#### **Direct discrimination**

*This means treating one person worse than another person because of a protected characteristic. For example, a promotion comes up at work. The employer believes that people’s memories get worse as they get older, so doesn’t tell one of his older employees about it, because he thinks the employee wouldn’t be able to do the job.*

#### **Indirect discrimination**

*This can happen when an organisation puts a rule or a policy or a way of doing things in place which has a worse impact on someone with a protected characteristic than someone without one. For example, a local authority is planning to redevelop some of its housing. It decides to hold consultation events in the evening. Many of the female residents complain that they cannot attend these meetings because of childcare responsibilities.*

## ▲ HARASSMENT AND DEGRADING BEHAVIOUR

- 💧 We prohibit any form of degrading treatment or acts of physical, moral, discriminatory, psychological, sexual harassment in the workplace, by their colleagues and managers.
- 💧 The SFA Group protects its employees by committing to creating a respectful work environment free from violence, intimidation, abuse, and threats.

## ▲ HEALTH AND SAFETY

- 💧 We protect the health and safety of all our employees and partners in our workplaces.
- 💧 In accordance with national requirements and taking into account its knowledge of occupational risks, the SFA Group implements appropriate safety and health measures to prevent occupational accidents and diseases.
- 💧 All employees have the right to clean sanitary facilities, rest facilities and drinking water in the workplace.

**SFA Group goes beyond the simple non-violation of human rights: we are committed to supporting and promoting these rights.**



## SPECIFIC AND MEASURABLE GOALS

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### **Freedom of Expression – Working conditions:**

- Renew our internal survey by involving 100% of the Group's subsidiaries around the world.
- Increase employee satisfaction to 80% by 2027, measured through regular surveys.

### **Digital Security - Data Privacy:**

- Train 95% of employees on digital security best practices by 2027.
- Obtain ISO 27001 certification for information security management.

### **Child Labour and Forced Labour:**

- Ensure 100% of our Class A and B; 80% of Class C suppliers of direct procurement sign the Supplier code of conduct by 2025.
- Obtain responses to the self-assessment questionnaire from 60% of our Class A and B suppliers of direct procurement by 2026.
- Carry out audits on 20% of Class A suppliers of direct procurement to ensure compliance with our standards by 2027.
- Train 100% of our employees in child labour and forced labour by 2027

### **Non-Discrimination, Equal Opportunities and Harassment:**

- Train 100% of staff to combat discrimination and harassment.
- Achieve 20% representation of women in leadership positions.

### **Occupational Health and Safety:**

- Reduce the frequency rate by 40% compared to 2027.
- Certify 50% of our production sites to ISO 45001.
- Train 100% of staff in "gestures and postures" at our production sites.
- Train 20% of staff in first aid by 2027.
- Reduce the absenteeism rate by 25% by the end of 2027.

## MONITORING AND REPORTING

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SFA Group will ensure the effectiveness and awareness of whistleblowing mechanisms. These mechanisms are accessible to everyone and allow people affected by our activities to report issues without the risk of penalties and retaliation. These mechanisms are transparent, impartial, and guarantee the protection of whistleblowers.

If human rights violations related to our operations or value chain are identified or reported, SFA Group will initiate a thorough investigation and, if necessary, a remediation process. The Group undertakes to take measures to remedy the damage caused by its activities or to which it has contributed, in particular by providing or cooperating in the remedying of harmful situations.

Internally, if confirmed, a human rights violation leads to disciplinary measures proportionate to the seriousness of the violation, up to and including dismissal. Corrective actions are proportional to the action.



## COMMUNICATION AND ACCESSIBILITY

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Our policy is publicly available and communicated both internally and externally, ensuring that all staff members, business partners, and other stakeholders are informed. For clarity and accessibility, this policy may be translated into the local languages of the countries in which we operate. In the event of any conflict or inconsistency between translations, the French (FR) and English (EN) versions shall prevail and shall be the only versions considered legally binding.

## DEROGATIONS

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No exemption from this policy can be granted except in exceptional circumstances or if the policy is clearly not applicable. All requests for exemptions must be made in writing to the Executive Board. The board must assess and process each application on a case-by-case basis.

Exemptions must be duly recorded and documented.

## APPROVAL AND REVIEW

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This policy has been approved by the Board of Directors. It will be reviewed every two years to ensure that it remains appropriate and relevant.

## CONTACT

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For more information, please contact the local CSR representative or the [Group CSR Committee](#).





## RELATED DOCUMENTS

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- 🔗 [SFA Group CSR policy](#)
- 🔗 [SFA Group Anti-corruption Code of Conduct](#)
- 🔗 [SFA Group Whistleblower Procedure](#)
- 🔗 [SFA Group Discrimination and Harassment Policy](#)
- 🔗 [SFA Group Sustainable Procurement Policy](#)
- 🔗 [SFA Group Supplier Code of Conduct](#)
- 🔗 [SFA Group Health, Safety and Quality of Life at Work Policy](#)

Version	Approbation	Description
V1	03-06-2021	Initial version
V2	22-11-2022	Occupational Health and Safety and Freedom of Expression was added
V3	20-06-2024	Digital Security and Quantitative Targets were added



# GROWING TOGETHER

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