



# CODE OF **ETHICS**

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COMMITMENTS AND POLICIES

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# MESSAGE FROM THE CHAIRMAN AND THE CHIEF EXECUTIVE OFFICER



## Introducing you to the broad outlines of our sustainable development approach



Séché Environnement, a family business with a long history of waste management, is a key player in the circular economy and environmental services, both in France and internationally. Thanks to our cutting-edge know-how and our complementary technologies, we support all stakeholders in their transition to a carbon-free economy.

Our Group made a commitment in 2003 to participate in the UN Global Compact program, **thus committing itself to respect 10 fundamental principles aimed at contributing to build a more sustainable society.** These principles, together with the Sustainable Development Goals (SDGs), form the foundation of our environmental, ethical, compliance, sustainable business model and social responsibility commitments.

*These guidelines are intended to be rolled out across all sites and our value chain*

The objective of this document is to present the broad outlines of our approach to sustainable development. It also includes an individual code of conduct providing rules of conduct. **These rules, combined with everyone's sense of responsibility, serve as a reference for the entire Group.**

Wherever we are present, these guidelines are intended to be deployed across all sites and our value chain (including customers and suppliers). Beyond the stated commitments, it is imperative that our activities are carried out in accordance with national and international laws with which we are strictly required to comply.

**It is essential to remember that our culture of ethics and compliance results from the commitment of all our employees.** It is a precious heritage that we must constantly nurture and cultivate to ensure the sustainability of our business model.

### Joël Séché

Chairman and Founder of  
Séché Environnement

### Maxime Séché

CEO of  
Séché Environnement



# SUSTAINABLE DEVELOPMENT GOALS (SDGs) AND GLOBAL COMPACT

# 02

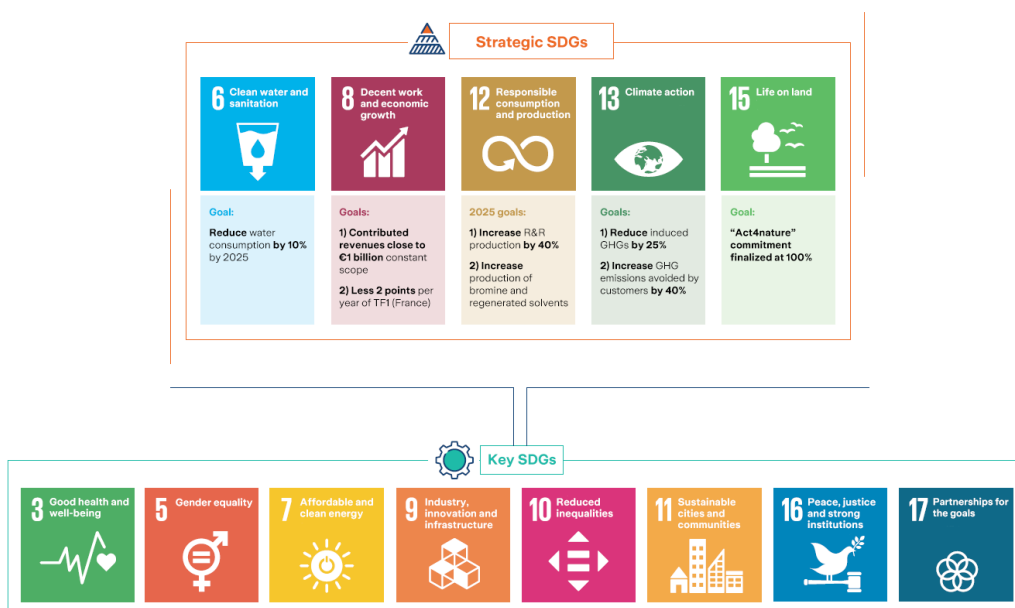
## Séché Environnement, signatory of the United Nations Global Compact since 2003

Since 2003, Séché Environnement has been committed to sharing the values of the Global Compact, an international initiative to promote sustainable development that brings together in 2023 about 23,000 participants in more than 160 countries.



This voluntary commitment is based on respect for 10 principles inspired by human rights, labor, the environment and combating corruption. Compliance with the principles of the Global Compact also makes it possible to align Séché Environnement's strategy with the 2030 Agenda and the 17 United Nations Sustainable Development Goals (SDGs)<sup>1</sup> and these 169 targets.

Séché Environnement is fully aware of the importance of the SDGs and the role that companies are called upon to play. To this end, the Group has identified the objectives and targets to which it contributes directly or indirectly in relation to its activity. By conducting this analysis, the Group has guaranteed internal and external monitoring and readability of its actions and impacts.



As part of the Global Compact, each member must have the effective implementation of the ten principles and their contribution to the SDGs certified annually in a “communication on progress” (COP), a report that is posted on the Global Compact website. A new standardized mechanism was put in place in 2023, which will allow us to further strengthen the robustness of these voluntary commitments.

*Strengthen transparency, but also share  
good practices, methodologies and experiences*

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Séché Environnement’s participation in this type of cooperation makes it possible not only to increase transparency, but also to share good practices, methodologies and experiences. Séché Environnement’s business model is based on reducing the environmental impacts of its customers, **so it is through cooperation, support and sharing that we will participate in building a sustainable world.**

**Thus, Séché Environnement’s goal is to continue its economic growth while reducing its environmental impacts as well as those of its customers.**

1. The Sustainable Development Goals were adopted in 2015 by UN member countries as part of the 2030 Agenda. They aim to eradicate poverty, but also to ensure the transition of our society to sustainable development through the fight against inequality and climate change.



# SCOPE, DEDICATED RESOURCE AND RESPONSABILITY

## Goal

The Code of Ethics has a dual purpose. **It aims to describe the Group's commitments to all of its sites and its value chain, while giving guidelines to each Sèche Environnement employee.** This document sets out the main guidelines of our sustainable development approach. Specific commitments are the subject of detailed policies listed on page 7.

## Frequency of updating the code of ethics

The code of ethics is intended to be updated as soon as the Group's strategic orientation on the topics of sustainable development and CSR or as legislation evolves. **This revision is based on the analysis of dual materiality published each year in the sustainability reporting: the Declaration of Extra-Financial Performance (referred to by its French acronym as "DPEF").**

## Means, resources and responsibility

The means implemented, the resources, the devices, the tools, as well as all the action plans to address each subject are described in great detail annually in our sustainability reports (DPEF & integrated report). The dual materiality matrix, action plans, objectives and indicators are included. Thus, **all directors (of the Group, each subsidiary and each site) are responsible for implementing this code of ethics.**

## Scope

This code of ethics is therefore implemented at the following levels:

- **Group**
- **Entity / site of the Sèche Environnement Group** in France and internationally
- **Individually** across all the Group's employees
- **Our value chain** (suppliers, service providers and customers)



## Structure of the Code of Ethics

This code of ethics is organized as follows:

### > General principles

as well as specific commitments on the topics:



**ENVIRONMENT**



**BUSINESS MODEL  
SUSTAINABILITY**



**ETHICS  
AND COMPLIANCE**



**SOCIAL**

### > An individual code of conduct

*It should be noted that the sites can enrich a policy on each of the topics covered in this code of ethics if the local context warrants it. Nevertheless, these additional local commitments complement the commitments detailed in this document.*

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## Articulation between the code of ethics and the Group's various policies

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This code of ethics brings together all the different policies implemented by the Group. Links to the detailed policies are available on this page.



### ENVIRONMENT

- > **Climate change**  
[For further reading](#)
- > **Energy**  
[For further reading](#)
- > **Pollution control**  
[For further reading](#)
- > **Biodiversity**  
[For further reading](#)
- > **Circular economy and waste management**  
[For further reading](#)
- > **Water resources**  
[For further reading](#)



### SUSTAINABLE BUSINESS MODEL

- > **Innovation and R&D**
- > **Responsible purchasing**  
[For further reading](#)
- > **Customer satisfaction**
- > **Cybersecurity**
- > **Territorial footprint and local development**



### ETHICS AND COMPLIANCE

- > **Regulatory compliance**
- > **Fair competition**  
[For further reading](#)
- > **Human and workers' rights and prohibition of child labor**
- > **Combating corruption**  
[For further reading](#)
- > **Combating tax evasion**  
[For further reading](#)



### SOCIAL

- > **Employee health and safety**
- > **Training, employee development and skills management**
- > **Working conditions and well-being of employees**
- > **Listening and employee engagement**
- > **Diversity and equal opportunities**



# A. ENVIRONMENT

## Climate change



### GENERAL CONSIDERATION

Climate change entails both significant risks (physical, financial, operational... especially in connection with adaptation), but also opportunities for Séché Environnement and its stakeholders (by developing low-carbon solutions, for example). Séché Environnement's activity is based on supporting its customers in achieving their ecological transitions and reducing their environmental impacts.

**The Group's commitment is therefore twofold: to reduce our carbon footprint and that of our customers.**

### THE GROUP'S POSITION

Aware of the paramount importance of decarbonizing our activity and that of our customers, **we are committed to combating climate change by reducing our greenhouse gas (GHG) emissions in connection with our activity**: by reducing our energy consumption; by increasing the energy efficiency of our facilities and our uses; by substituting carbonaceous energies with renewable energies; by combating diffuse biogas emissions on our non-hazardous waste landfill facilities.

**In addition, we are committed to supporting our customers in achieving their own ecological transitions** by reducing their GHG emissions through our energy recovery and material recovery activities.

In parallel with our efforts to mitigate climate change, we adapt to climate change according to the following axes:

- **Assessing climate risks:** We conduct climate risk assessments to identify our company's vulnerabilities related to climate change.
- **Building resilient infrastructure:** We integrate climate resilience into the design of our infrastructure to minimize potential damage from extreme weather events.
- **Train and raise awareness:** We make our employees aware of the issues related to climate change.
- **Intervening with our customers in the event of environmental accidents** through our environmental service activities.

### GOAL

1. **Reduce our scope 1 and 2 GHG emissions by 10% by 2025 compared to 2020.**
2. **Increase GHG emissions avoided by our customers** through our material and energy recovery activities by 40% by 2025 compared to 2020.
3. **Evaluate and then adapt our facilities and value chain to climate change.**
4. **Train as many employees as possible** on climate change.





# ENVIRONMENT

## Energy



### GENERAL CONSIDERATION

Given the challenges related to the depletion of natural resources and more generally the environmental consequences of their exploitation, reviewing our energy consumption patterns is essential in the context of the energy transition. **In addition, reducing our dependence on fossil fuels and our energy consumption makes it possible to contribute to the reduction of greenhouse gas emissions responsible for climate change.**

### THE GROUP'S POSITION

**The Group is committed to reducing its energy consumption and increasing the energy performance of its facilities and uses.** In addition, the Group is committed to providing its customers - manufacturers and local governments - with green energy from waste recovery, thus limiting the use of fossil fuels.

### GOAL

1. Reduce our energy consumption by 10% by 2025 compared to 2020.
2. Increase green energy production to achieve 300% energy self-sufficiency by 2025.



# ENVIRONMENT

## Pollution control



### GENERAL CONSIDERATION

Séché Environnement is an expert in waste management, particularly industrial and hazardous waste. These flows require expertise and installations specific to their technical characteristics, such as installations classified for the protection of the environment (ICPE). **The management of releases from each ICPE is continuously monitored and controlled by the public authorities.**

### THE GROUP'S POSITION

**Beyond strict compliance with regulations for each of our facilities, the Group is committed to minimizing releases into the air, water and soil.** In addition, Séché Environnement has embarked on a voluntary ISO 14001 (environmental management) certification process with all classified sites. Séché Environnement also develops clean-up and environmental emergency solutions to help our customers reduce pollution.

### GOAL

1. **Beyond strict compliance with regulations, limit atmospheric, aqueous and terrestrial releases** by relying on the best available techniques (BAT).
2. **Protect the environment and human health on our sites and those of our customers through our clean-up and emergency response activities.**



# ENVIRONMENT

## Biodiversity



### GENERAL CONSIDERATION

**Biodiversity conservation provides essential ecosystem services for humanity.** The list of reasons to protect nature and the benefits it provides us is long and varied: the ecological stability that the diversity of species provides us within an ecosystem, the wide range of ecosystem services (supply of natural resources, regulatory services...) that we have thanks to nature, or the resilience that biodiversity offers us to mitigate the consequences of climate change.

### THE GROUP'S POSITION

**For Séché Environnement, the protection and preservation of biodiversity is part of its DNA and has been one of its core values since its creation.** For more than 30 years, the company has been carrying out concrete actions and providing financial and human resources (dedicated biodiversity department consisting of 6 ecologists) to ensure a balance between industrial development and the protection of biodiversity.

**As part of its biodiversity strategy, the Séché Group is committed to deploying its biodiversity action plans through three pillars spread over all industrial sites:**

- Know and act
- Educate and raise awareness
- Get involved at all levels

**The Group also has many voluntary commitments** such as the Act4Nature initiative, the *Enterprise Engagée pour la Nature* program ([Company Committed to Nature] "EEN" of the French Office for Biodiversity) and ECOCERT's "Biodiversity Commitment" certification for the six sites with the largest land holdings.

**In addition, our actions in favor of biodiversity are deployed throughout our value chain** and more particularly with:

- **Our customers:** through our clean-up, emergency response, and biodiversity service activities.
- **Our suppliers:** we include environmental requirements in our purchases.
- **Our investors:** sustainable financing incorporates criteria on biodiversity.

### GOAL

1. Finalize 100% of our Act4Nature commitments on our 30 volunteer sites by 2027.
2. Cover more than 80% of the land area, subject to ICPE authorization, by a biodiversity diagnosis carried out by an external third-party expert by 2027.
3. 0 phytosanitary products (pesticides) used on 100% of sites in 2027.
4. Identify, report and limit wildlife traps at sites.
5. Sanctuarize the equivalent of 30% of ICPE land areas.
6. Achieve the creation of more than 150 ecological habitats (differentiated management, habitats and micro-habitats) by 2027.
7. Carry out at least one local awareness-raising action per site by 2027.



# ENVIRONMENT

## Circular economy and waste management



### GENERAL CONSIDERATION

Given the challenges related to the depletion of natural resources and the need to make territories more resilient, **it is crucial to think about sustainable modes of supply that promote the circular economy.**

### THE GROUP'S POSITION

**As a major player in the circular economy**, Séché Environnement is committed to recovering as much waste as possible from its customers. In addition, the Group is committed to minimizing the production of waste in connection with its activity and to offering it, to the extent possible, a second life (material or energy).

**In addition, the circular economy is a powerful lever for the development of territories and the creation of local waste recovery loops.** Thus, Séché Environnement is committed to promoting as much as possible projects that strengthen the local economy and to promoting the development of territories.

### GOAL

1. **Adopt simplicity as an approach** by becoming more resource efficient in our uses.
2. **Increase the share of waste treated and recovered** (received and produced).
3. **Develop circular economy activities** in order to increase the greenhouse gas emissions avoided by our customers.
4. **Develop territories** through the creation of local waste recovery loops.





# ENVIRONMENT

## Water resources



### GENERAL CONSIDERATION

Less than 1% of the water available on Earth is considered safe to drink and accessible. Less and less water enters the ground to replenish the groundwater, in particular due to the artificialization of the soils. **Yet some of our industrial activities and those of our customers depend directly on the use of water resources.** Faced with this observation, the Group is deploying solutions to reduce its water consumption as well as that of its customers.

### THE GROUP'S POSITION

As such, **we are doubling our efforts to preserve the water resources on our sites** by committing to reducing our water withdrawals, while increasing the quantities of reused and recycled water.

In addition, we implement **industrial water treatment and sanitation solutions** with our customers, thus preserving the resource.

### GOAL

1. **Reduce our water consumption** by at least 10% by 2025 compared to 2020.
2. **Increase our quantities of recycled water.**
3. **Implement the industrial water treatment and sanitation activity** with our customers in a circular economy and resource preservation logic.

## B. SUSTAINABLE BUSINESS MODEL

### Innovation and R&D



#### GENERAL CONSIDERATION

Research and Development is a company's ability to mobilize its knowledge and tools to generate innovation that provides a sustainable competitive advantage that supports its business. In a highly competitive and rapidly changing market, **innovation makes it possible to remain competitive in order to better integrate market needs and regulatory and societal changes that are increasingly demanding.**

#### THE GROUP'S POSITION

Since its inception, **Séché Environnement has implemented a strategy of anticipation and technological innovation that contributes to the affirmation and strengthening of its position as a specialist in the waste business, in particular in hazardous waste markets with strong technical constraints.**

This culture of innovation allows Séché Environnement to consolidate its performance, accelerating the circular economy. Thus, innovating makes it possible not only to reduce the impacts of the Group's activities by improving its performance, but also to offer its customers more responsible solutions.

#### GOAL

- 1. Improve existing processes** by anticipating issues of productivity, safety, reduction of environmental impacts and regulatory compliance.
- 2. Meet the specific needs of customers in terms of waste recovery and treatment**, through the development and implementation of ad hoc processes.



# SUSTAINABLE BUSINESS MODEL

## Responsible purchasing



### GENERAL CONSIDERATION

In accordance with its sustainable development policy, the Group aims to engage its internal and external stakeholders in improving their ESG (Environment, Social and Governance) performance. Indeed, mobilizing and engaging its value chain is crucial if we want to collectively achieve the ecological transition.

**This is why Séché Environnement wants to involve its suppliers in its sustainable development approach through its responsible purchasing policy.**

### THE GROUP'S POSITION

**The Group's responsible purchasing policy was launched in 2022 and is based on 3 pillars: the ethical dimension, societal impacts and the preservation of the environment.** Indeed, the Group is aware that purchasing decisions have major socio-economic and environmental implications. Procurement must therefore be conducted in a safe manner and target more environmental-friendly products and practices.

The Procurement office undertakes this strategic mission within the Group with the support of the Sustainable Development Department. This commitment revolves around the harmonization and deployment of good practices aimed at raising the ordering parties' awareness of the challenges involved in the act of purchasing, and providing them with support and concrete tools to make better purchases.

### GOAL

- 1. Evaluate our main suppliers** in order to promote the most responsible on the social, societal and environmental aspects.
- 2. Educate our buyer teams** on the importance of responsible purchasing.
- 3. Support our suppliers in their transitions in order to make our value chain responsible.**



# SUSTAINABLE BUSINESS MODEL

## Customer satisfaction

### GENERAL CONSIDERATION

It is strategic to offer our customers **solutions to meet their transition strategies**. Satisfying the customer is a powerful lever for creating loyalty, improving our reputation and the success of their ecological transition.

### THE GROUP'S POSITION

**The satisfaction of our stakeholders and customers is a priority.** To this end, the Group is committed to responding quickly to the expectations and requests of our stakeholders, to providing the best quality products and services, and to continuously improving our processes.

### GOAL

1. **Maintain the highest quality standards** at our certified sites while continuously seeking ways to improve and innovate to better serve our customers.
2. **Strive towards 100% satisfaction of our interested parties.**





# SUSTAINABLE BUSINESS MODEL

## Cybersecurity



### GENERAL CONSIDERATION

**In today's interconnected world and digital landscape, the risk of cyberattack is more than ever a major risk that no company can ignore.** Any breach of IT security can have serious consequences for the Group's business as well as for its customers.

Whether it's phishing scams, malware attacks, ransomware or social engineering, the range and complexity of cyber threats continues to expand and requires extreme vigilance.

### THE GROUP'S POSITION

**In response to cybersecurity challenges, the Group is committed to a number of measures, such as:**

- **Raising awareness** among all stakeholders, through permanent awareness campaigns based on digital tools and regular phishing tests.
- **Implementing EDR (Endpoint Detection and Response) type solutions** to monitor terminals (laptops, desktops, phones, etc.) and detect unknown attacks in order to make the necessary corrections.
- **Strengthening authentication processes** by deploying multi-factor authentication.
- **Monitoring all security events** for weak signals of attacks by setting up a Security Operation Center (SOC).

### GOAL

The Group's goal is to protect its Information System (IS) from known attacks, and to make it as resilient as possible in the face of a cyberattack in order to limit the consequences on the company.

1. **Capture all cybersecurity events 24/7 and send them to the SOC** (Security Operations Center) which analyzes them and allows decisions to be made quickly.
2. **Reduce the spread of the attack** by relying on so-called Limited Services accounts.
3. **Activate the Cyber Crisis Cell** as quickly as possible.
4. **Have unalterable backups** to trace and rebuild compromised applications without delay.



# SUSTAINABLE BUSINESS MODEL

## Territorial footprint and local development



### GENERAL CONSIDERATION

**Companies have a major role to play in the development and well-being of the regions where they operate.** Whether through economic development, respect for stakeholders, support for communities at the local level.

**Territorial corporate responsibility represents an opportunity** to strengthen links with local communities and to create an environment that is favorable in the long term for their activities.

### THE GROUP'S POSITION

In order to take into account the issues related to territorial developments within our regions, Séché Environnement undertakes to:

- **Respect and listen to local communities and stakeholders:** It is essential for a company to integrate well into the local environment and create communication channels and strong relationships based on transparency and sincerity. This involves listening, understanding and taking into account the concerns and expectations considered realistic and relevant by these stakeholders, as well as collaborating with them.
- **Raise awareness of environmental issues and the circular economy through our open-door policy:** backed by its commitment to transparency, Séché environnement has an open door approach to these facilities, the Group plays a role in promoting sustainable practices through the explanation and awareness of the importance of its activity, environmental issues and the promotion of the circular economy.
- **Develop sponsorship or mentoring and cooperation on social and environmental issues:** Supporting local projects or initiatives that have a positive impact on the community contributes to progress towards a desirable society. This can include funding projects that are aligned with our values, objectives and the expectations of our stakeholders.
- **Foster local development:** By engaging in local development activities, businesses can contribute to economic growth, job creation and improving quality of life in the regions where they operate.

### GOAL

1. **Give continuity to our open-door policy** on our facilities and our business lines.
2. **Continue to create clear and robust channels of communication** with our stakeholders.
3. **Continue to finance and monitor projects** as part of our sponsorship actions that meet our objectives and values.

# ETHICS AND COMPLIANCE

## Regulatory compliance



### GENERAL CONSIDERATION

Compliance with the laws and regulations in force is the foundation of trust between economic actors. **It is also a necessary condition for the sustainability of the Group, which, as a family business, is in it for the long term.**

The Group's reputation is the result of its employees' conduct: the illegal behavior of a single employee can cause considerable damage to the Group.

### THE GROUP'S POSITION

Any conduct likely to lead the Group into an illicit practice is strictly prohibited. **Séché Environnement and its employees undertake to comply in all circumstances with the national and international laws and regulations applicable in all the countries in which the Group operates.**

Regardless of the penalties that may be imposed by law, any employee guilty of such a breach, which would constitute a violation of his professional obligations, will be subject to disciplinary action.

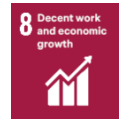
### GOAL

- 1. Ensure full compliance with national and international laws and regulations in all company operations and activities**, ensuring that every employee and site understands the importance of complying with these legal standards.
- 2. Reduce the number of sites to receive official non-conformity reports**



# ETHICS AND COMPLIANCE

## Fair competition



### GENERAL CONSIDERATION

The purpose of competition law is to foster a dynamic economic environment through innovation and pressure on prices between actors who must act independently.

In addition to substantial sanctions, breaches of competition law cause damage to the image and reputation of the Group, reducing the confidence of its stakeholders.

### THE GROUP'S POSITION

The Group is committed to conducting its activities in compliance with the principles of fair competition. This implies strict compliance with laws and regulations regarding anti-competitive behavior.

As such, the Group has set up a voluntary competition compliance program, including a risk map, a competition code of conduct applicable to all its employees and training campaigns. The points of vigilance concern cartels, abuse of a dominant position, behavior in professional associations and concentrations.

### GOAL

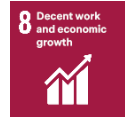
1. Make 100% of the company's employees aware of, understand and respect the Group Competition Code of Conduct.
2. Train 100% of employees exposed to risks related to competition law.
3. Ensure full compliance with competition laws and regulations on 100% of our entities.





# ETHICS AND COMPLIANCE

## Human and workers' rights and prohibition of child labor



### GENERAL CONSIDERATION

Séché Environnement firmly believes in the dignity and fundamental rights of every individual, and is therefore committed to **respecting human and workers' rights, paying particular attention to the prevention of child labor**. The Group is committed to creating an ethical and responsible work environment, where all forms of child exploitation are strictly prohibited.

### THE GROUP'S POSITION

In accordance with the principles of the International Labour Organization (ILO) and international standards, **Séché Environnement ensures that its employees are of legal working age and that their work is voluntary, safe and does not harm their well-being.**

### GOAL

The company is committed to putting in place monitoring and compliance mechanisms to ensure adherence with these principles, and works closely with its suppliers and partners to promote these values throughout its supply chain.

1. Ensure that 100% of Séché Environnement entities comply with the laws and regulations relating to the prohibition of child labor and forced labor.
2. Ensure that HR processes (recruitment and job offer) integrate the principles of the above goal for 100% of the Group's internal and external employees.



# ETHICS AND COMPLIANCE

## Fighting corruption



### GENERAL CONSIDERATION

Sustainable Development Goal No.16 of the Global Compact, entitled “Peace, Justice and Effective Institutions”, calls on companies to **take action against all forms of corruption**. Indeed, corruption latter erodes confidence and social cohesion and hinders growth. **Its total economic cost, although difficult to calculate, is estimated at 5% of global GDP.**

**Around the world, anti-corruption laws, some of which have extraterritorial reach, impose standards of probity on companies.** For people and companies involved in corruption, the consequences are particularly severe: fines and imprisonment, loss of investors’ and business partners’ confidence and destroying the reputation.

### THE GROUP'S POSITION

**The Group condemns and prohibits all forms of corruption.**

As part of its membership in the Global Compact, Séché Environnement is committed to fighting corruption. In addition, the company strictly adheres to the anti-corruption laws of the countries in which it is present.

**To this end, the Group has implemented an anti-corruption compliance program in accordance with the requirements of the French law known as “Sapin II”,** including any necessary local adaptations. The Group’s compliance program is based on a risk map, according to which prevention, detection and remediation measures are applied throughout the scope.

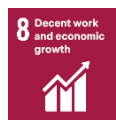
### GOAL

- 1. Address 100% of alerts** reported by the Ethics Alert System and the chain of command.
- 2. Raise awareness among as many employees as possible and train** more specifically those exposed to risks of corruption.
- 3. Take into account and assess the risk of corruption** in relations with our third parties.
- 4. Strictly enforce French anti-corruption regulations** by following the principles set out in the Group’s Anti-Corruption Code of Conduct for all employees.
- 5. Strictly enforce French anti-corruption regulations on our external stakeholders.**



# ETHICS AND COMPLIANCE

## Fighting tax evasion



### GENERAL CONSIDERATION

**The fair contribution of all economic actors to their tax obligations is a major issue;** it is an essential condition for respecting the principle of equality before tax and guaranteeing fair competition between companies.

**The Group's strategy is part of a territorial development approach and therefore ensures that it contributes in a fair and transparent manner in the countries where it operates in accordance with the laws and tax rules in force.**

### THE GROUP'S POSITION

**The Group's tax code of conduct is overseen by the Group's Chief Financial Officer,** while its effective application is supervised by the Group's Administration and Finance Department. **Séché Environnement entities pays income tax in the countries where it creates value and** operates, in this case primarily in France, in accordance with applicable tax laws and regulations. **The Group attaches particular importance to compliance with tax regulations,** the developments of which are monitored carefully and proactively because we stand by maintaining transparent, constructive, professional and long-term relations with the tax authorities. That is why we commit ourselves not to resort to tax evasion, not to create structures devoid of economic or commercial substance, especially in countries considered to be tax havens, but to adopt ethical tax practices guided by the concern for meeting the needs of the real economy.

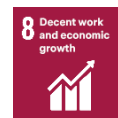
**The Group's tax policy aims to ensure legal protection for its operations, while striving for proactive, balanced, and efficient tax management** in compliance with national and international tax laws and regulations, and reinforcing the long-term stability of its business. In addition, we are committed to applying our ethical tax practices with our third parties by refusing any contractual modality clearly intended to allow tax evasion practices by a third party.

### GOAL

- 1. Adopt ethical tax practices** internally and with all our stakeholders and be part of a continuous and systematic improvement approach.
- 2. Encourage a responsible tax environment** to control tax risks and ensure legal security for our operations.
- 3. Regularly raise awareness among our entire staff** internally and guarantee continuous support on the tax aspects of their operations.

## D. SOCIAL

### Employee health and safety



#### GENERAL CONSIDERATION

**The prevention of occupational risks includes all the measures implemented to preserve the health and safety of employees, improve working conditions, ensure well-being at work and strive for zero accidents.**

It is a regulatory obligation imposed on the employer and the general principles of which are set out in the French Labor Code. It is part of a logic of corporate social responsibility, aimed at eliminating, if not reducing the risks of occupational accidents and diseases and limiting their human, social and economic consequences.

#### THE GROUP'S POSITION

**In this context, the Séché Environnement group places Quality, Health and Safety at the heart of its activities. Its commitment is based on respect for people, stakeholders and the environment around them.**

Ensuring the health and safety of our employees is our absolute concern. To this end, we are committed to providing the best working conditions and achieving a high level of quality of life at work on our sites. We support, train and equip our employees accordingly.

**Each site has staff competent in QHSE (quality, health, safety, environment), and can rely on a Group QHSE department, a network of Group health/safety preventers, as well as the Sustainable Development team.**

#### GOAL

1. Strengthen a health and safety culture on our sites.
2. Move towards 0 occupational accidents and 0 occupational diseases resulting from our activities.
3. Achieve a TF1 of less than 12 by 2025 compared to 2019 in France (rate of frequency).
4. Achieve a severity rate of less than 1 by 2025 within France.





## SOCIAL

### Training, employee development and skills management



#### GENERAL CONSIDERATION

**The Group firmly believes that human capital is its most valuable asset.** Our training and skills management policy aims to cultivate an environment conducive to continuous learning, professional development and the constant improvement of our performance.

**The Group is convinced that the motivation and mobilization of women and men in the company constitute a wealth and a real competitive advantage.** This is why Séché Environnement strives to attract, train, develop and retain its employees at all levels of qualification and in all employment areas where it is present.

In addition, there is a risk that the Group will lose certain skills and will not be able to replace them quickly despite implementing an employee monitoring and career management policy, mentoring, training courses and identification of key skills in the Group.

#### THE GROUP'S POSITION

**Séché Environnement is committed to training its employees, developing talents, and offering career development opportunities** in order to bring out everyone's full potential, and, ultimately, to promote the personal development of its employees through its skills development plan.

Séché Environnement endeavors to conduct employee evaluations at least every 2 years, which serves as a time of discussion with the manager in order to:

- **Take stock** with the employee about their activities;
- **Articulate the company's plans** as well as the employee's **individual plans**;
- **Discuss the expectations and needs** in connection with the professional development or the securing of the employee's career path;
- **Determine the actions to be implemented** with a view to the employee achieving their professional goals;
- **Inform the employee** about how to access vocational training.

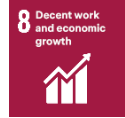
#### GOAL

1. Maintain high average rates of achievement of the skills development plan.
2. Maintain a stable average number of hours of training per employee over time.



## SOCIAL

### Working conditions and well-being of employees



#### GENERAL CONSIDERATION

**The Group firmly believes that healthy and fulfilled employees are the key to its collective success.** It is for this reason that the Group is committed to designing a collaborative, stable, safe work environment, where every employee can achieve their professional and personal potential.

#### THE GROUP'S POSITION

In order to improve the organization of working time and a balance between personal and professional life, **for several years the Group has adopted a policy on professional equality and quality of life at work.** As such, working remotely, regular sporting challenges, and continuous adjustments to working environments have been put in place...

#### GOAL

1. Continue these actions that contribute to our attractiveness on the job market as well as the loyalty of our employees.
2. Continue to apply our remote working charter to eligible employees.
3. Pursue actions that can improve the quality of life at work.



## SOCIAL

### Listening and employee engagement



#### GENERAL CONSIDERATION

The creation of environments conducive to the expression of needs, ideas, concerns and improvements represents an opportunity for the Group to strengthen its connections with its employees, to create meaning and cohesion, to improve its productivity, creativity and innovation, as well as to contribute to retaining talent and the company's overall performance.

Effective and transparent communication and listening require the encouragement of active participation and respect for the rights of free expression and representation. These employee representative bodies present within our subsidiaries make it possible to ensure constructive and transparent social dialog<sup>2</sup>.

#### THE GROUP'S POSITION

The Group intends to continue to remain accessible and attentive to the feedback from the field. In addition, the short internal decision-making circuit allows Séché Environnement to be flexible, reactive and adaptable.

#### GOAL

1. Continue to organize regular meetings within the work entities (department meetings, team meetings, etc.) to facilitate direct and collective expression.
2. Allow employees and their representatives, during these meetings, to ask questions relating to **working conditions, the organization of the activity, production within the work units**, to the exclusion of issues relating to the collective status and employment contracts.
3. Provide answers to the questions raised.

2. For the French case: Introduced on an experimental basis by the law of August 4, 1982, the right to direct and collective expression of employees on the premises and during working time was made permanent and generalized by the law of January 3, 1986 for all companies without minimum staffing requirements. The order of September 22, 2017 was passed to supplement the provisions, in particular by including the use of digital tools to ensure the exercise of this right of expression.

## Diversity and equal opportunities



### GENERAL CONSIDERATION

**Promote diversity and equality within our company and a major strategic focus as part of Séché Environnement's responsible approach.** The Group believes in the power of diversity, which enriches our corporate culture, strengthens our creativity and contributes to our overall success.

**Focusing on diversity is above all a social equity issue, but especially an opportunity to attract talent, and to improve the Group's employer brand.**

### THE GROUP'S POSITION

Séché Environnement is committed to guaranteeing:

- **A fair and non-discriminatory HR process** during recruitment, monitoring of the career plan and remuneration process.
- **Non-discriminatory access to employment and to prohibit any discrimination** in connection with health status, gender, age, sex, philosophical ideologies, family situation, pregnancy, disability, morals, nationality, and any other discriminatory behavior not listed above.

### GOAL

1. **Improve the percentage of women in the Group, the management and the board of directors** in order to continue to improve the scores of the gender equality index for France.
2. **Continue to develop the disability policy.**
3. **Continue training employees** to raise their awareness of non-discrimination, particularly in recruitment processes.
4. **Improve the % indicators of employees under 30 and over 55 years of age.**



# CODE OF CONDUCT

This Code applies to Séché Environnement employees and its entire value chain.

## 01. Make the protection of health, the environment and responsibility towards people the conditions for the company's sustainability.

Each employee is responsible for ensuring that the activities of Séché Environnement which depend on them are carried out in accordance with the regulations in force, supplemented where necessary by the Group's internal rules, in terms of health, safety and environmental protection.

To respond to this, all the Group's employees are part of an **active protection approach** and implement procedures and/or facilities management methods that make it possible to:

- **Prioritize prevention** and put in place all the necessary measures to ensure the best possible protection of health and safety at work, both for the Group's employees and for those of third-party companies;
- **Set measurable objectives for their environmental performance**, regularly evaluate and monitor this performance, with a view to rapid implementation of corrective measures if necessary. The certification procedures obtained or initiated (ISO 14001, ISO 45001, Mase) allow the parameters related to respect for the environment and the protection of the safety and health of people to be taken into account in an organized and recognized manner.

DOS	DON'TS
Identify and reduce health and safety hazards before starting your work.	Ignore health and safety rules and procedures.
Share best practices in terms of health and safety with your work colleagues and within your teams.	Tolerate and allow employees to work in unsafe conditions.
Report any identified occupational safety, health or integrity hazards to your QSE Manager.	Fail to report to your QSE manager an accident that may have occurred.
Create a work environment that encourages reporting any identified hazards.	Discourage employees from making reports (e.g. failure to take into account or consider reports).
Measure and evaluate your QSE performance in order to take possible corrective actions and strive for zero accidents.	Neglect to monitor QSE performance and implement corrective actions.

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## 02. Promote a real attitude of Social Responsibility within facilities where social dialogue, raising awareness and training staff in Sustainable Development take precedence.

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Séché Environnement scrupulously ensures respect for the rights of employees and prohibits, in particular, any discrimination on the basis of origin, customs, sex, age, political or religious opinions, trade union membership or disability of individuals, whether in recruitment, hiring and/or during the life of the employment contract, in France or abroad.

Respect for people is an absolute condition for the individual and professional development of employees, who are attentive and mobilized on the three dimensions of Sustainable Development: environmental, social-societal and economic. This respect takes the form of listening, providing information, explaining and engaging in dialogue, while respecting everyone's privacy.

Social dialogue and sustainable development are inseparable. Also, on all matters of common interest, Séché Environnement advocates cooperation with its employees and their representatives, and provides them with quality information.

Finally, the notions of loyalty and solidarity are imperative to the success of social dialogue. Translation is the spirit of responsibility that everyone must develop in their profession to put aside individualistic attitudes and promote the value of teamwork through mutual contributions.

DOS	DON'TS
Be kind and respectful with other employees.	Practice all forms of harassment and/or discrimination.
Cultivate a team spirit and mutual support between employees and use reporting channels (chain of command or whistleblowing system) in the event of inappropriate behavior.	Turn a blind eye and fail to report any inappropriate behavior (discrimination, harassment, etc.).

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## 03. Clearly express the Company's Social Responsibility to its customers and suppliers in order to promote sustainable development in both methods of production and consumption patterns.

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Séché Environnement strives to go beyond mere satisfaction of the basic needs of its customers in terms of waste recovery and treatment, to provide them with:

- The guarantees of proper performance of the tasks entrusted to it that it is entitled to expect (management of the environmental and social impact of its activity in compliance with the regulations in force and control of risks);
- Service costs compatible with the general economic environment;
- Help to better understand its waste management initially experienced as a constraint, to allow it to set the standard as an actor protecting the environment while protecting health.

With its suppliers, Séché Environnement applies a responsible purchasing policy whose essential axes derive from the following considerations:

- It is imperative that production and consumption patterns reduce environmental and social risks;



- **Purchasing is an important lever to extend and generalize best practices** in terms of Sustainable Development, involving the entire value chain, including suppliers;
- **The responsible purchasing policy must favor an approach in terms of overall cost.** With this in mind, Séché Environnement develops partnership relationships in order to optimize the cost/benefit ratios of each operation.

DOS	DON'TS
Ensure quality work in economic, social and environmental terms.	Forget to highlight the added value of Séché Environnement's approach to waste recovery and treatment with our customers.
Ask our suppliers to improve their environmental and social practices.	Tolerate unacceptable environmental and social practices within our supply chain.

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#### 04. Behave as a responsible corporate citizen who listens to changes in society, leading a policy of transparency, consultation and continuous improvement that incorporates the legitimate expectations of stakeholders.

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As such, Séché Environnement, an actor of the city, adheres to a strict political, religious and philosophical neutrality:

- The Group shall refrain from making any financial contribution for the benefit of candidates, elected officials or **political parties**;
- Any employee can of course **participate in political life in a personal capacity**, outside the workplace and working hours, but they cannot use the image of the Group in support of their commitment;
- The Group shall limit its participation in the **financing of associations, foundations or sponsorship operations** to the cases provided for by the legislation in force, within the framework of the values and priorities defined by the Group.

In contrast to these restrictive and cautious positions, the Group is committed to proactive relationships:

- **With its shareholders by keeping the financial markets informed, by appropriate means, of any event or information likely to influence the share price.** At the same time, the members of its Board of Directors, and its General Management, as well as its employees who may, as a result of their duties, hold inside information, that is to say not publicly known, undertake to comply with the rules of the Group's Code of Ethics and also the stock market legislation relating to insider trading or misconduct (including the regulations of the French Autorité des Marchés Financiers (AMF)) with regard to their own interventions on the financial markets;
- **With its other stakeholders**, to establish local relations of the best possible quality, whether with local residents, administrations, the educational world and associations..., relations resulting in particular in:
  - Opening the sites to as many people as possible;
  - Employees who listen to local concerns, opinions and expectations, involved in collaborations with educational institutions;
  - A preference for local employment.

DOS	DON'TS
<b>Adopt a transparent attitude</b> and listen to our stakeholders.	<b>Speak on behalf of the Group</b> in support of your personal commitments.
<b>Participate in social dialogue</b> in the company.	<b>Launch initiatives that may pose a risk to the company's reputation.</b>
<b>Learn about the company's charitable contributions.</b>	<b>Make a donation on behalf of the company</b> without obtaining prior authorization.

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## 05. Contribute to the research and development of eco-efficient methods for the recovery and treatment of waste that is always safer in terms of impact on health and the environment.

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Séché Environnement strives to implement an investment, research and development policy leading to the permanent improvement of its industrial facilities and processes in order to make the methods used safer and limit their impacts. The desire to strive for the best eco-efficiency requires that each employee implement their professional skills at the best possible level in a spirit of solidarity, which implies:

- Regularly reviewing the Group's internal and external best practices;
- Encouraging all feedback and putting it to use;
- Targeted training actions;
- A method of networking that is a source of enhanced improvements.

DOS	DON'TS
<b>Take a step back from our practices.</b>	<b>Fail to regularly re-evaluate</b> our industrial facilities and processes.
<b>Exchange internal and external best practices</b> within the Group.	<b>Keep good ideas to yourself.</b>
<b>Work as a team and proactively</b> on these topics.	<b>Discourage or prevent others from</b> getting involved in the continuous improvement of our business.

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## 06. Complying with health, safety and environmental regulations by applying the best available techniques (BAT) at an economically acceptable cost. Take part as often as possible in a logic of active anticipation.

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Séché Environnement is committed to implementing an active environmental, occupational health and safety policy and to ensuring its consistent application:

- Anticipation through appropriate monitoring;

- Use of the best available techniques;
- Listening to agents;
- Rigorous evaluation of their working conditions;
- Feedback.

These channels require reactivity, curiosity, exchange and a continuous challenging of the knowledge, techniques and expectations of everyone, whether they are an employee or another “stakeholder”.

DOS	DON'TS
Be aware of and strictly comply with health, safety and environmental regulations.	Compromise on hygiene, health and safety at work.
Adopt a proactive and continuous improvement approach in the application of BAT.	Think you don't have to learn anything anymore.
Exchange and discuss practices carried out at work.	Missing moments of exchange and listening between employees.
Escalate possible improvements to your manager.	Disregard or be afraid of suggesting a potential improvement to your manager.

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## 07. Make one's ethical behavior and respect for the laws and international conventions in force the fundamental rule of their business conduct.

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No employee shall accept any remuneration, gifts or other benefits from a competitor, customer or supplier of the Group, nor shall they offer any of the above to a competitor, customer or supplier of the Group. Only gifts or invitations that remain within acceptable limits with regard to Group policies, customs and anti-corruption legislation may be permitted. Under no circumstances is the employee authorized to request a gift or an invitation.

It is prohibited to pay, offer or agree to pay bribes or grant undue advantages, directly or through an intermediary, to a public official or private person in any country, with the aim of obtaining preferential treatment or influencing the outcome of a negotiation in which the Group is an interested party. These practices are contrary to the law and the international convention on combating corruption, applicable in most countries.

**Ethics and integrity require total honesty on the part of everyone in their professional activity.** Each employee must avoid any situation of conflict between the interests of the Group and their personal interest or that of their relatives. Thus, everyone is prohibited from taking an interest in a supplier or a customer, unless it is carried out by the purchase of listed securities as part of the management of a portfolio of securities and in compliance with the rules prohibiting the use of inside information. **Similarly, it is prohibited to work for an existing or potential competitor, customer or supplier without the Group's consent.**

DOS	DON'TS
<b>Engage in honest behavior</b> in the context of one's professional activity.	<b>Offer, accept or promise a gift</b> for the purpose of obtaining or retaining an unfair advantage.
<b>Avoid any situation of conflict of interest</b> between the Group's interests and one's personal interest and, where appropriate, report it.	<b>Conceal information about</b> any actual or potential conflict of interest.

## 08. Implement rules of conduct, detect breaches and exercise the whistleblowing right.

**Séché Environnement's Code of Conduct and Actions is distributed to all Group employees. It may also be communicated outside the Group, if necessary, in particular to its customers, suppliers and shareholders.**

The application of the rules of this Code is binding on all Group employees and contributes to developing a culture of responsibility as part of the Group's commitment to strict compliance with legislation and the principles of good corporate governance.

**If this Code proves to be unclear or incomplete in certain situations, it is up to each employee to contact their supervisor to find out what approach to take.** Finally, this Code contains certain legal or regulatory obligations. In this regard, non-compliance with such obligations may be considered a breach that may be sanctioned, in accordance with the rules of each country and the Group's disciplinary regime.

**Its scope is limited to acts contrary to laws and regulations**, to those that seriously question the rules of operation of society in general, or of a particular community to which the whistleblower belongs.

**The whistleblowing by the employee is carried out by the chain of command or the Group's whistleblowing system, in an identified or anonymous manner.** The Group strictly adheres to protecting whistleblowers as provided by law, including the commitment to confidentiality and ensuring there is no retaliation. Exercising the whistleblowing right requires strong accountability on the part of everyone, drawing on the employee's own ethics. It can only work on the basis of factual information communicated "in good faith".

DOS	DON'TS
<b>Become familiar with the Code of Conduct</b> and adopt a responsible culture at work.	<b>Disregard or be afraid of reporting</b> what you believe to be a violation of the Code of Conduct.
<b>Identify and report</b> any breaches of the Code of Conduct.	<b>Attempt to solve a problem on your own</b> without exercising the whistleblowing right.
<b>Read the Group's procedures</b> for reporting and handling whistleblowing.	<b>Use the whistleblowing system in bad faith</b> for malicious purposes.
Disclose to my supervisor and the Director of Compliance <b>any family or other relationship, or any personal interest</b> , with a candidate for a position or contract with the Group.	Fail to disclose <b>a situation that could influence or give the appearance of influencing</b> the independent and objective exercise of my job within the Group in my relations with external third parties.



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