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## PRINCIPLES OF IMPLEMENTATION

## Foreword by Laurent Pizzamiglia, LOGIFI Group CEO

Our family founded the group in 1987, bringing its vision, principles and ethics.

Throughout the subsidiaries of LOGIFI Group, we are committed to key principles which we have preserved and upheld for 30 years.

Our strategies and decisions have always been guided by this DNA. These core principles forge our structure, our backbone.

We believe that the people we employ must share these fundamental principles.

Only by sharing the same values as us can they find their place and thrive in our organisations.


In a world of turmoil where fundamental values such as human rights, individual freedom and integrity are trampled upon, we believe it is important to formalise our values and ethics through this document, and thus provide our employees with a formal guide.

Contrary to many companies who prefer to use their code of ethics as an external communication tool with little regard for upholding their commitments, we act on our words. We rethink our organisation on a regular basis to further embody the notion of 'acting well to feel well'.

This ethics charter lays out our actions and we ask all our employees to fully and unreservedly accept its principles, as a code of conduct and a code of honour.

The signature of this charter by all employees formalises this engagement and will represent a moral contract between us.

We must be able to feel proud of what we do and how we do it.

A handwritten signature in black ink, appearing to be "Laurent Pizzamiglia".

**Laurent PIZZAMIGLIA**  
Group CEO



## 1. THE SELI SPIRIT

### ▪ Working together

Our wish is that all our employees and all our subsidiaries work together, openly and with respect for one another. Proximity management is our chosen approach.

We encourage team work and share in our successes and failures.

We must:

- Acknowledge other people's ideas and contributions.
- Listen and share information freely, in accordance with Groupe SELI's confidentiality rules.

We must not:

- Disrespect others, in particular through abusive language, inappropriate gestures or racist comments.
- Abuse hierarchical power.
- Belittle our colleagues, our customers or our suppliers.

Our wish is to uphold our corporate culture which is based on honesty, integrity, trust, solidarity and team spirit.

### ▪ Respect of Human Rights

We have committed to respecting Human Rights by referring to the Universal Declaration of Human Rights.

### ▪ Moral and sexual harassment

We are all entitled to respect and human dignity. Any form of behaviour in breach of these rights, in particular in the form of moral or sexual harassment, is unacceptable.

We must:

- Support and foster the Group's commitment to creating a work place free of any form of moral or sexual harassment.
- Show respect for everyone, and treat our colleagues, customers and suppliers as we would like them to treat us.

We must not:

- Intentionally harm, offend or lead others into fault.
- Continue with inappropriate behaviour if we are told it is unwelcome.

### >> Let's speak openly

If you or one of your colleagues are experiencing moral or sexual harassment, or bullying, or are unable to speak out in safety, do not keep it to yourself. Speak to your direct supervisor, to your HR Business Partner or General Management, who will provide their support and assistance.

## 2. RESPECTING OUR COMMITMENTS AS AN EMPLOYER

### ▪ Safety

Any individual working for or with the Group is entitled to a healthy, risk-free working environment. Work safety is everyone's concern; it is therefore essential that safety rules are strictly adhered to by all, whether employees, customers or suppliers.

We must:

- Take all the necessary measures to maintain a safe and risk-free working environment.
- Be aware of what to do in the event of an emergency in the workplace.
- Notify our supervisor of any accident or form of behaviour, even minor, or any installation or situation that may pose a risk to our working environment.
- Ensure transporters comply with the rules related to driving time or overloads, etc.
- Do not hesitate to warn a colleague who may be putting themselves at risk.
- Refer regularly to the occupational risk evaluation document (DUER), in countries where it is applicable.

We must not:

- Ignore safety rules in our workplace.
- Expose anyone to a risk, in particular a subordinate.

### ▪ Integration of young employees

At SELI, we foster the integration of young people via work-study programmes and long-term internships. The apprenticeship and professionalisation scheme is a strategic tool of our HR policy.

#### >> Let's speak openly

If you or one of your colleagues is facing a safety issue, do not keep it to yourself. Speak to your direct supervisor, to your HR Business Partner or General Management, who will provide their support and assistance.

### 3. RESPECTING OUR COMMITMENTS AS A COMPANY

#### ▪ **Suppliers**

In the Group, we know that success depends not only on our teams, but also on our strategic suppliers with whom we form partnerships.

We must:

- Ensure that our ethical requirements are understood and complied with by our suppliers.
- Help our suppliers to meet the Group's requirements.
- Pay our suppliers in accordance with the agreed lead time and terms, except if there are legitimate grounds for non-payment.

We must not:

- Impose abusive terms on our suppliers with regard to payments or lead times.
- Continue working with a supplier who does not correspond to our requirements or does not respect our ethical code.
- Issue instructions which are contrary to the legislation in effect (e.g. driving time, overload, etc.).

#### ▪ **Corruption**

Corruption is unacceptable and incompatible with the spirit of the Group.

Gifts and invitations can contribute to enhancing business relations, but can also lead to conflict. It is therefore important to comply with the following rules.

We must:

- Inform our line manager or general management of any gift or invitation received.
- Inform our line manager or general management of any event or attempt at corruption, a request for illegal payment or any other act of corruption.

We must not:

- Give, offer, promise or request, either directly or indirectly, a sum of money or the provision of services with a view to illegally obtaining or maintaining an order, compensation or competitive advantage.
- Receive or give cash or a gift of disproportionate value with a view to obtaining orders or any other form of benefit.

#### ▪ **Confidentiality and data security**

All employees in the Group must ensure the protection of insider information. The disclosure of insider information can lead to a loss in value and may be prejudicial for the Group.

We must:

- Ensure that any information which is not public remains confidential.
- Limit the disclosure of confidential information to those having a legitimate need to know and in the interest of the Group.
- Protect confidential or insider information obtained in the exercise of our role and ensure that such information is not disclosed in an informal context.
- Remain vigilant with regard to the use of IT resources and data, and apply in-company security standards.

We must not:

- Disclose insider information without authorisation.

- **Respecting privacy, personal data and business data**

Personal data protection is a fundamental right. All employees and stakeholders with whom the company has dealings are entitled to the respect of their private life. We undertake to protect personal data.

We must:

- Collect only the personal data that is strictly necessary for the execution of our tasks.
- Store personal data in complete security.
- Internally transmit personal data solely to those who have a legitimate need of such data.
- Protect our customers' business data from external sources, in particular their competitors.

We must not:

- Transmit personal data to anyone outside of the Group, except in the event of legal obligation or if the person in question has provided their consent.
- Collect 'sensitive' data without the consent of the person in question or solely in the event of a legal requirement.
- Spread rumours about employees or colleagues.

### >> Let's speak openly

If you or one of your colleagues is facing a dilemma regarding the choice and the handling of suppliers, gifts and invitations, corruption, confidentiality, respect of privacy, or personal and business data, do not keep it to yourself. Speak to your direct supervisor, to your HR Business Partner, General Management, or, if necessary, the Data Protection Officer ([rgpd@seli.fr](mailto:rgpd@seli.fr)), who will provide their support and assistance.



## 4. RESPECTING OUR COMMITMENTS AS A SOCIALLY RESPONSIBLE COMPANY

Each employee of the Group undertakes to integrate environmental, social and societal concerns in their actions, while taking into account the interests of all stakeholders (employees, customers and suppliers).

The commitment of all the Group's employees is to ensure a reduction in the negative impacts of their activity on the environment, and thus guarantee sustainable development for the company.

Keeping this in mind, we have decided to survey our carbon footprint in order to assess our environmental impact, identify and prioritise the most significant sources of emissions and thus establish an action plan for their control and reduction.

As the smallest gestures can make a difference, we actively encourage our employees to:

- Use car-pooling,
- Switch off lights when they are not needed and when we leave the office,
- Avoid over-heating the premises and use heating and air conditioning reasonably,
- Make sure electric devices are switched off, and air conditioning or heating levels are lowered at the end of the day.

We also undertake to:

- Renew vehicles while continuing to cut CO2 levels (an ongoing engagement initiated 3 years ago),
- Raise awareness of certain environmental recommendations among transporters, via the drivers' manual,
- Renew office lighting with low-energy light bulbs,
- Ensure that all purchases of domestic electric devices comply with class A or B energy consumption criteria.

As waste management forms an integral part of this engagement, all our sites are affiliated with dedicated waste management service providers and avail of sorting facilities for optimal recycling. We publish the list of treated waste on a regular basis, in addition to waste sorting recommendations issued by the service providers, to raise awareness and remind employees of good practices.

Our activity involves the use of large amounts of paper; we therefore make every effort to limit our use of paper, either through re-use, or, where possible, through the electronic management of documents (HR and accounting). We will raise awareness among our employees on the use of printers, with the aim of reducing print volumes by 10%.

The same principle applies to computer equipment, for which, in association with our dedicated subsidiary, we implement a policy of extended life-cycle through repair and/or replacement of spare parts wherever possible. Henceforth, consumption must be integrated as a fundamental criterion in our subsidiary's purchasing policy for computer equipment.

In awareness of our environmental impact, we contribute to the reforestation of the Aquitaine region.

Every shipment entrusted to us helps the forest to grow. As part of a shared and sustainable approach, for every 100 tonnes transported, we undertake to plant a pine tree to offset a part of CO2 emissions. A dedicated counter can be found on our website at [www.seli.fr](http://www.seli.fr).



## PRINCIPLES OF IMPLEMENTATION

The aim of the present Ethics Charter is to ensure the efficient and fair operation of Groupe LOGIFI.

This Ethics Charter, transmitted throughout the Group, must be read, accepted and applied coherently by all our companies and subsidiaries: LOGIFI, SELI, SELI OVERSEAS, SELI GMBH, SELTI, LOTRAFF, LOTRAFF France, SELI WOOD, PIING and all our property-management companies, and by all those to come, in all countries in which we operate, in compliance with international standards, legislation and local regulations.

This Charter and its principles, which should not be considered as exhaustive, must be complied with by all employees of Groupe LOGIFI.