



ACT WITH INTEGRITY

# Code of Conduct

MESSAGE FROM THE  
**Chairman & CEO**



**PASCAL REMY**  
CHAIRMAN AND  
CEO OF SNF GROUP

Since its inception, SNF has expanded its activity following ethics principles which can be summarized along two lines of conduct:

- ▶ Act in full compliance with the laws and regulations of each country of operation,
- ▶ Develop a culture of integrity, loyalty and honesty.

These principles apply to all types of relationships that SNF employees can encounter:

- ▶ Internal relationships within the Group,
- ▶ Relationships with customers, suppliers and competitors,
- ▶ Relationships with any public group interacting with our activity.

The Code of Conduct sets out the rules followed by SNF and defines the individual and collective guidelines each employee must comply with. The Chief Compliance Officer is available to all employee of the Group to answer any questions regarding the interpretation and implementation of this Code.

Our values are both specific to SNF, as they have been forged by our history and culture, and universal since they are inspired by fundamental principles such as the Declaration of Human Rights and the United Nations Global Compact.

We are fortunate to be position on markets which contribute to the

preservation of our environment since the bulk of our activity is dedicated to clean or to preserve water.

I trust I can count on every employee of our Group to keep expanding our activity while living fully and daily our values and ethics principles.

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# CODE OF CONDUCT

# **Act with Integrity**

Our Values

Human Rights

Why Do We have a Code of Ethics?

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How to Use the Code of Ethics?

Our Ethical Decision Tree

How to Raise an Ethical Concern?

ACT WITH INTEGRITY

# Our Values

SNF is a global specialty chemical player whose markets are driven by the scarcity of key resources: fresh water, oil and minerals. More than 80% of our applications are designed either to treat water, to preserve water or to optimize the usage of water.

SNF is present in more than 50 countries with industrial and commercial premises. In the complex environment in which we operate, it is necessary to have strong values and ethics principles to guide but also inspire our employees.

The values that have guided SNF over the years are the following:

## DUTY

SNF has grown with a culture of large autonomy where everyone is expected to do his – or her – best given his – or her – competences. It is a culture of freedom and of responsibility. Living up to the ethics principles of this Code is part of the duty of everyone.

## EXEMPLARITY

This applies to everyone all the time.

A manager has a duty of exemplarity over his or her direct reports. Senior employees have a duty of exemplarity over junior ones which will tend to act based on the behaviors they observed. As a company, SNF strives to be an example of a good corporate citizen.

## SOLIDARITY

Everyone needs to consider his or her action as it pertains to the global benefit of the company and its customers without looking for individual profit or reward. At SNF people win or lose together. SNF as a corporation also carries the value of solidarity in helping preserve the world water.

## COURAGE

Difficulties of various nature are part of any business life. Courage means that difficulties must be faced upfront and immediately. When a problem occurs solving it is the only issue that matters.

**Duty, Exemplarity, Solidarity and Courage are the values that have forged the identity of SNF. Together with the ethics principles described in this Code, they are the basis of our development and the foundation of our collective success.**



# Human Rights

SNF is committed to respecting and supporting human rights with regard to its employees, the communities in which it operates and its business partners as expressed in the internationally recognized standards including the U.N. Universal Declaration on Human Rights.

In addition to the broad range of human rights and workplace issues addressed elsewhere in this Code of Ethics and in the Group's policies, SNF prohibits any kind of child labor or forced labor. SNF takes seriously any indication that human rights are not properly protected within its sphere of influence or that it may be complicit in any human rights violation. Employees are expected to understand the human rights issues that may be at stake in their workplaces and should prevent any violation of these rights.

“  
**SNF stands resolute in its commitment to respect for human rights, upholding the principles of human dignity, equality, and ethical conduct.**

”



FURTHER READING

**Conflict Minerals Policy**  
**Human Rights Policy**



ACT WITH INTEGRITY

# Why Do We Have a Code Of Conduct?

SNF operates in many countries, each representing a wide variety of cultural, social and legislative environments. Our employees come from many different cultural backgrounds and speak dozens of languages. We are proud of our global workforce, and their diversity gives us a competitive advantage. As a company and as employees, we must always respect the laws and regulations of the countries in which we operate.

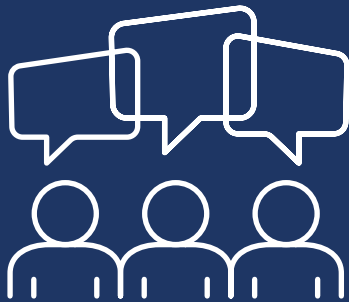
Our Code of Conduct is our compass, applying to the entire SNF Group

worldwide. It helps us to understand what is expected of each of us as part of the SNF Group, and to identify the issues that require particular attention so that we can live up to our values and commitments to act with the utmost integrity at all times.

Our Code of Conduct sets out the basics for the Group and offers guidance in a number of cases. More than ever, the golden rule is to communicate and consult before acting.

ACT WITH INTEGRITY

# Who is Responsible For Our Code?



Whatever your role is at SNF, the principles of our Code should be at the core of every business decision you make. Our Code applies to everyone in our company, everywhere, from our offices, plants and warehouses to the boardroom, including:

- ▶ All SNF employees, including employees of SNF's subsidiaries.
- ▶ Members of the SNF Board of Directors when they act in their capacity as directors.

Our company's Board of Directors is responsible for adopting our Code.



ACT WITH INTEGRITY

# How to Use the Code of Conduct?

This Code of Conduct applies to every SNF employee wherever SNF operates its business. Third parties acting on behalf of SNF are also expected to act within the framework of the Code.

Every employee should be familiar with the contents of this Code of Conduct and act accordingly. This Code should be applied within the framework of applicable laws and regulations on every country.

The SNF Code of Conduct provides general guidance and is not an exhaustive document anticipating every situation employees may face in their day-to-day business life. Employees should also be familiar with SNF's policies devoted to day-to-day operations.

Employees are encouraged to ask questions when they need clarity and to speak up when they have ethical or compliance concerns.



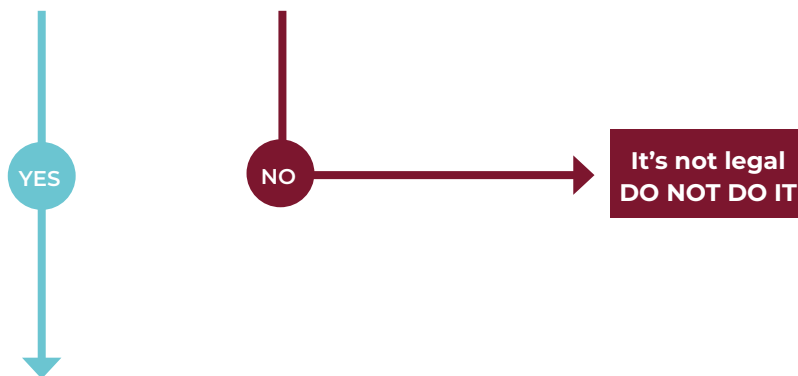
## ACT WITH INTEGRITY

# Decision tree

# 1

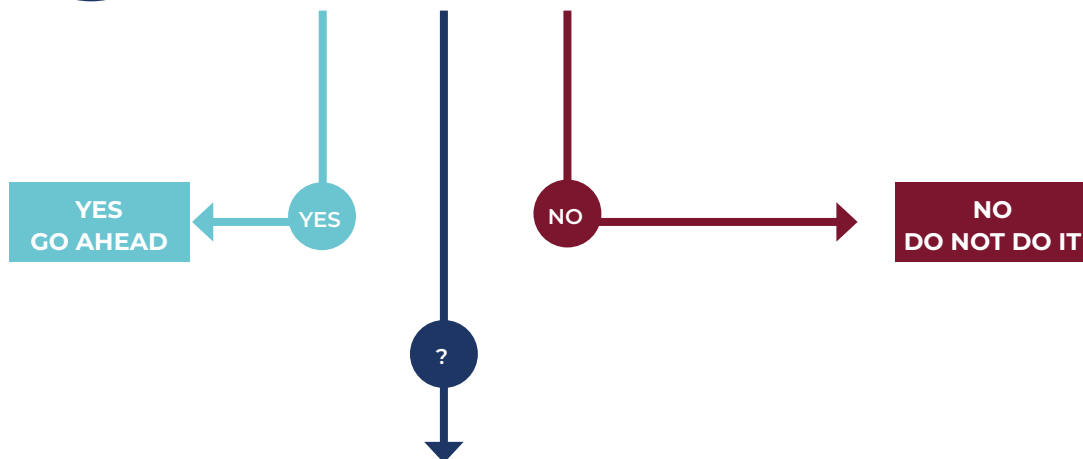
You are facing a situation and are not sure which decision you should take?

**Check with your legal team whether it is legal**



# 2

Is the decision you need to make in line with the Code of Conduct and internal policies?



# 3

The situation is not covered within the Code of Conduct nor any internal policies

- Ask yourself: Is it in line with SNF's values: Duty, Exemplarity, Solidarity, Courage?

**- and ask your Chief Compliance Officer.**



SILENT

SILENT

SPEAK UP

SILENT

SILENT

# How to raise an ethical concern?

Being able to quickly identify ethical misconduct is key to ensuring we live up to our Code of Conduct and our Ethical Principles throughout all our activities and geographies.

It is important to ensure that all concerns are supported by consistent and detailed facts.

We recognise that speaking up is not always easy and can be intimidating. We have set up various trustworthy communication channels and in line with whistleblowing best practices.

You can also raise your ethical concern through the normal management channels.

In case of any doubt, don't hesitate to speak up: you should not assume your concerns are known at the right level of the organisation. If your concern is not admissible according to our Speak Up policy, we will redirect you to the appropriate department, with your prior consent, while always respecting the confidentiality of your identity.



FURTHER READING

**Whistleblowing  
Procedure**



**SNF**  
WATER SCIENCE



ACT WITH INTEGRITY

# As a Business Partner

Responsible Chemistry  
Safe and Quality Products  
Strong Relationships with our Business Partners  
Fair Competition  
Treatment of Personal Data  
Conflict of Interest  
Fight Against Corruption  
Fraud and Illicit Activities

ACT WITH INTEGRITY AS A BUSINESS PARTNER

# Responsible Chemistry



SNF's mission is to develop, produce, and market solutions to preserve or recycle water while reducing energy consumption during usage and, consequently, its related CO<sub>2</sub> emissions.

Through its environmental commitments, SNF Research and Development (R&D) is focused on developing new - or enhancing existing - solutions and innovating toward more sustainable products, technologies, and applications.

## We act for

- ✓ Complying with existing or reasonable future regulations and customers' vision.
- ✓ Well-defining sustainable raw materials in our polymers.
- ✓ Lowering environmental impact of our products and processes.
- ✓ Manufacturing products that preserve natural resources and energy and reduce the application's carbon footprint during use.
- ✓ Developing a comprehensive approach of the fate and behavior of our polymer in the environment.
- ✓ Promoting the scientific culture through academic partnerships.



### FURTHER READING

**Responsible Chemistry Policy**  
**Responsible Care Policy**  
**Sustainability Policy**

THE WAY WE ACT > AS A BUSINESS PARTNER

# Safe and Quality Products

SNF is committed to minimizing the environmental impact of our products and promoting the health and safety of our customers, employees, and the communities in which we operate.

We encourage all employees to embrace and contribute to this approach in their respective roles, fostering a culture of safe and quality product throughout our organization.

## We act for

- ✓ Adding more sustainability principles into our product design and development process.
- ✓ Signing up with sub-contractors and suppliers who respect our safety and quality standards.
- ✓ Minimizing hazardous substances in our products and exploring feasible alternatives.
- ✓ Multiplying strict safety & quality checks of our products.



FURTHER READING

**Responsible Chemistry Policy**  
**Product Stewardship Policy**



ACT WITH INTEGRITY AS A BUSINESS PARTNER

# Strong Relationship with our Business Partner



At SNF, we believe in maintaining a respectful, ethical, and professional environment for all individuals involved in our partnership network. We promote collaboration, trust, and integrity among our partners, fostering a positive and sustainable business relationship.

We want to build trust, foster long-term relationships, and collectively contribute to a sustainable and responsible business environment, reflecting SNF's commitment to ethical and accountable business practices.

## We act for

- ✓ Conforming to applicable local, national, and international laws, regulations, and standards.
- ✓ Explaining our ethical expectations and support business partners in meeting them
- ✓ Ensuring fair and safe working conditions and prohibiting forced labor, child labor, and discrimination or harassment.
- ✓ Encouraging open communication and expecting our Partners to cooperate in any investigations related to potential breaches of this policy.



### FURTHER READING

**Business Partner Code of Conduct**  
**Responsible Purchasing Policy**

ACT WITH INTEGRITY AS A BUSINESS PARTNER

## Fair Competition

SNF is committed to fair competition, consumer welfare, and compliance with antitrust laws globally.

SNF contribute to a vibrant, innovative, and competitive marketplace that benefits consumers, businesses, and the overall economy worldwide.



### We act for

- ✓ Working for fairly competition, abiding all laws and regulations related to.
- ✓ Denouncing anti-competitive practices such as price-fixing, collusion, or other unfair trade practices.
- ✓ Following a zero tolerance on corruption, monopolistic practices and price or market manipulation.
- ✓ Observing non abusive use of intellectual property rights.
- ✓ Protecting consumer: no misleading advertising, false claims, unfair pricing or anti competitive behavior.
- ✓ Broadcasting regular public awareness campaigns to educate consumers and stakeholders about their rights and the importance of fair competition.



FURTHER READING

**Antitrust and Competition Law Policy**



ACT WITH INTEGRITY AS A BUSINESS PARTNER

# Treatment of Personal Data



SNF aims to protect its digital assets, maintain the confidentiality, integrity, and availability of information, and safeguard against unauthorized access and digital threats.

This principles serves as a foundation for SNF's commitment to digital security. It sets the expectations for all individuals associated with SNF to actively participate in maintaining a secure digital environment.

## We act for

- ✓ Strengthening access control with multi-factor authentication and prompt remove possibilities
- ✓ Carrying out regular monitoring, encrypted sensitive data and backups offsite.
- ✓ Auditing our IT system on regular basis.
- ✓ Ensuring our Network Security with Firewalls, Intrusion detection and prevention system.
- ✓ Updating regularly our antivirus software and security patches.
- ✓ Replying quickly to incident by implementing response plan for containment, investigation and recovery.
- ✓ Setting up regular training and awareness session to educate employees on best practices



FURTHER READING

**Digital Security Policy**

ACT WITH INTEGRITY AS A BUSINESS PARTNER

# Conflict of Interest

Employees shall exercise fair, objective and impartial judgment in all business dealings, placing the interests of SNF over any personal interests in matters relating to the business of the Group.

SNF remains aware that each of us may, at one time or another, find ourselves in a situation where our personal or financial interests may appear to conflict with the interests of the company.

Transparency prevents this from becoming an ethical problem.

## We act for

- ✓ Avoiding conflicts of interest that compromise judgment or impartiality in decision-making processes.
- ✓ Disclosing promptly any potential conflicts to the appropriate channels.
- ✓ Promoting organization's best interests and avoiding personal gain or advantage at the company's expense.



FURTHER READING

**Conflict of Interest Policy**

ACT WITH INTEGRITY AS A BUSINESS PARTNER

# Fight Against Corruption



The Group prohibits bribery in any form. SNF and its employees do not use gifts or entertainment to gain competitive advantage. Under no circumstances is the exchange of cash or cash equivalent acceptable. Facilitation payments are not permitted by SNF.

Goodwill gestures like gifts and invitations must be strictly limited. SNF requires its employees to be vigilant regarding such gestures of goodwill.

Employees must determine if a gift or invitation offered by the commercial partners of SNF is likely to affect business relations. In any case, it is recommended that supervisors be consulted to guarantee the reasonable nature of the proposed gesture of goodwill.

## We act for

- ✓ Building our business through merit and conduct ourselves with integrity in all locations where we operate.
- ✓ Guiding our decisions and actions by what is best for our customers, our business, and society as a whole.
- ✓ Ensuring integrity, transparency and accountability.
- ✓ Fighting for zero-tolerance with regards to corruption.

“  
**SNF does its utmost to choose reliable and ethical commercial partners**  
 ”



FURTHER READING

**Anti-Corruption Policy**



ACT WITH INTEGRITY AS A BUSINESS PARTNER

# Fraud and Illicit Activities

As an ethical company, we have a duty to fight against fraud and illicit activities

We promote a culture of integrity at all levels of the company and put in place effective fraud risk control procedures in order to eradicate opportunities to commit illegal acts.

We comply with the laws governing our accounting records and principles, tax and financial disclosure.

We use SNF property for legitimate business purposes.

## We act for

- ✓ Complying with all internal procedures
- ✓ Giving precise and regular information to internal, external or occasional employees about risks of fraud, specifying the rules to be followed and the rights and duties of each individual.
- ✓ Guaranteeing that company assets are not stolen, lost, damaged or misused, loaned, transferred, sold or donated without authorisation..



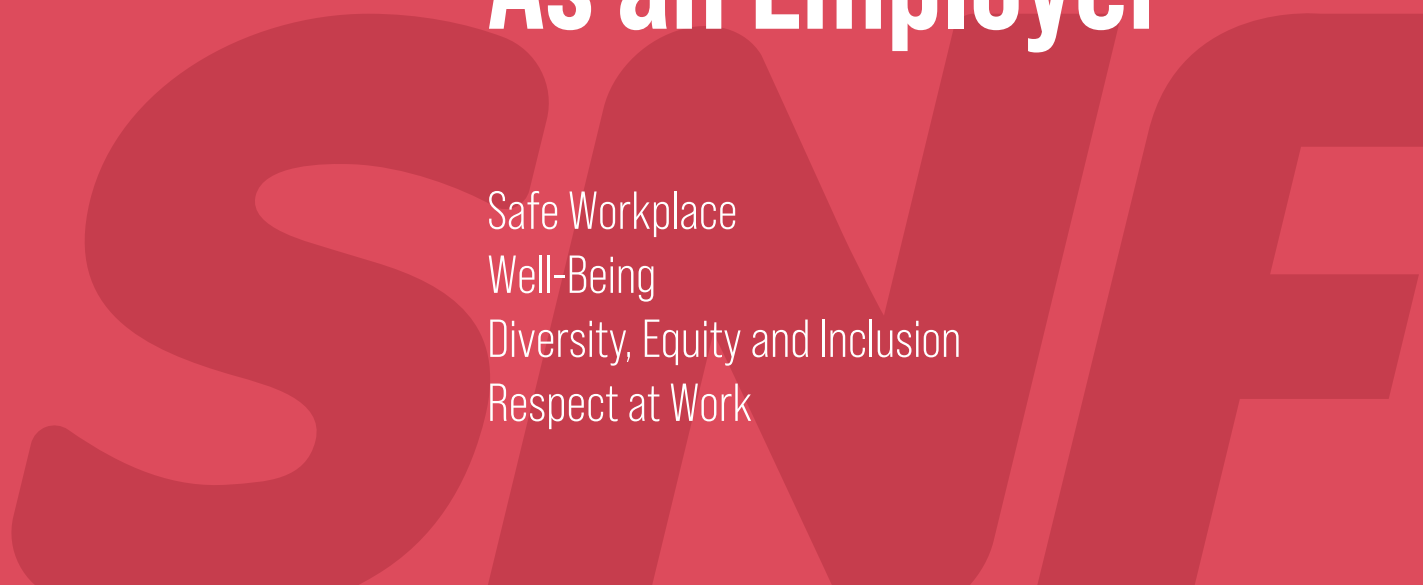
FURTHER READING

**Antitrust and Competition Law Policy**



ACT WITH INTEGRITY  
**As an Employer**

Safe Workplace  
Well-Being  
Diversity, Equity and Inclusion  
Respect at Work





ACT WITH INTEGRITY AS AN EMPLOYER

# Safe Work Place



SNF is committed to a solid, quantified, and ambitious improvement process.

We firmly believe that occupational accidents and diseases are preventable. The commitment and involvement of everyone within our organization are essential to reporting risky behaviors and situations, analyzing them, and preventing their recurrence.

We aim to create a safe and healthy work environment for all employees at SNF.

## We act for

- ✓ Complying with all applicable laws, regulations and risk prevention policies.
- ✓ Training in accident prevention.
- ✓ Engaging our collaborators in the protection of health and hygiene at work.
- ✓ Promoting openness and dialogue in undertaking all necessary actions regarding safety, health and hygiene, in order to preserve the work environment.
- ✓ Involving each employee to the safety of the workplace by being alert and aware of the rules, policies and procedures and by reporting any unsafe conditions.



FURTHER READING

**Health and Safety Policy**

**Security Policy**

**Accident Prevention Policy**

ACT WITH INTEGRITY AS AN EMPLOYER

## Well-Being

At SNF, we value the well-being of our employees and recognize that a positive work environment is essential for their overall health and productivity.

We want to create a supportive and inclusive workplace culture that supports the holistic well-being of our employees, enabling them to thrive personally and professionally



### We act for

- ✓ Prioritizing all employees' physical, mental, and emotional well-being in our work environment
- ✓ Raising awareness about the importance of employee well-being and encourage proactive measures to maintain it.
- ✓ Providing resources, support, and guidelines to help employees maintain a healthy work-life balance.
- ✓ A mutual respect and inclusivity culture where employees feel valued, supported, and empowered.
- ✓ Compliance with relevant health and safety regulations.



FURTHER READING

**Well-Being at Work Policy**

ACT WITH INTEGRITY AS AN EMPLOYER

# Diversity, Equity and Inclusion



Recognizing that we all have much to learn from one another, we view diversity as a valuable contribution to our spectrum of perspectives. We treat everyone reasonably within SNF and emphasize creating a just, ethical, respectful, and egalitarian workplace.

Acting against any form of discrimination is a means of preventing inequalities. At SNF, we advocate for dignity, actively combating distinctions that hinder our progress in all forms.

## We act for

- ✓ Promoting an environment where all employees feel respected, valued, and empowered to contribute their unique perspectives and talents.
- ✓ Encouraging fair and inclusive practices throughout our recruitment and hiring processes.
- ✓ Ensuring a climate of trust that encourages open communication, so that employees feel heard and supported.
- ✓ Building diversity and economic inclusion within our supply chain.
- ✓ Reviewing periodically our diversity and inclusion initiatives to ensure their effectiveness.



FURTHER READING

**Diversity and Inclusion Policy**  
**Recruitment Policy**



ACT WITH INTEGRITY AS AN EMPLOYER

## Respect at Work

SNF is committed to maintaining a safe, respectful, and inclusive environment for all employees, visitors, and contractors. Harassment in any form is strictly prohibited and will not be tolerated.

SNF is dedicated to fostering a safe and respectful environment free from harassment. We work together to create a workplace that upholds our values of dignity, respect, and equality for all.



### We act for

- ✓ Establishing responsible management team setting the tone and promoting a harassment-free environment
- ✓ Identifying responsible employees treating others with respect and reporting any incidents of harassment promptly.
- ✓ Protecting confidentiality of all harassment reports to the extent permitted by law.
- ✓ Taking appropriate disciplinary action including counseling, warnings, suspension, termination of employment, or legal actions, as deemed necessary.
- ✓ Providing regular education and training programs to employees to raise awareness about harassment, its impacts, and the importance of maintaining a harassment-free environment.



FURTHER READING

**Anti-Harassment Policy**



ACT WITH INTEGRITY

# As a Responsible Corporation

Respect our Planet

Carbon Footprint

Water and Waste Management

A Positive Impact on Communities



ACT WITH INTEGRITY AS A RESPONSIBLE CORPORATION

# Respect our Planet



SNF is dedicated to protecting the environment, reducing our ecological footprint, and promoting sustainable practices within our organization. SNF is committed to being a catalyst for the transition towards a more sustainable world.

In addition to our environmental commitments, this also translates into preserving biodiversity.

SNF actively engages and educates its employees and partners on the importance of respecting and preserving biodiversity.

## We act for

- ✓ Monitoring and update our practices to ensure ongoing compliance and minimize potential adverse environmental impacts.
- ✓ Promoting energy-efficient technologies, water-saving initiatives, and waste-reduction strategies.
- ✓ Implementing recycling programs, reducing packaging waste, and responsibly disposing of hazardous materials.
- ✓ Developing clean technologies, properly handling and disposing of pollutants, and regularly monitoring emissions.
- ✓ Conducting regular environmental audits, tracking key performance indicators, and implementing corrective actions where necessary.
- ✓ Preserving biodiversity by implementing sustainable practices and initiatives.



FURTHER READING

**Environmental Policy**  
**Biodiversity Policy**

ACT WITH INTEGRITY AS A RESPONSIBLE CORPORATION

# Carbon Footprint

At SNF, we are dedicated to minimizing our environmental footprint. SNF is committed to responsible energy management and environmental stewardship. By reducing energy consumption, integrating renewable energy sources, and collaborating with our stakeholders, we aim to positively impact the environment while ensuring the long-term sustainability of our operations.

Through continuous improvement and a focus on partnerships, we strive to be a global leader in more sustainable energy practices and contribute to a greener future for all.



## We act for

- ✓ Seeking opportunities to increase our reliance on renewable energy sources.
- ✓ Promoting sustainable energy practices and reducing carbon emissions throughout our supply chain.
- ✓ Monitoring and evaluating our energy management practices to identify areas for improvement.
- ✓ Increasing the share of renewable energy in our total energy consumption.
- ✓ Searching for suppliers and contractors engaged to promote sustainable energy practices.



FURTHER READING

**Energy Policy**  
**Climate Change Policy**

ACT WITH INTEGRITY AS A RESPONSIBLE CORPORATION

# Water & Waste Management



## We act for

- ✓ Minimizing water usage during production processes (water efficient technologies and equipment).
- ✓ Applying water recycling systems and technologies to treat and reuse water in our production processes wherever feasible.
- ✓ Supporting proactive maintenance program to detect and repair leaks promptly.
- ✓ Promoting regular training and awareness programs to all employees on water-saving practices and water conservation

Preserving water is in the SNF team's DNA, and we know that this resource is precious and tends to become scarce if we do not take all possible measures to save it.

SNF is committed to reducing water consumption and promoting sustainable water management practices during its production processes. As our activities are closely linked to water,

SNF must preserve this resource and ensure its treatment and access by the populations through local actions such as constructing wells or, more generally, offering product ranges for drinking water.

SNF will adopt environmentally responsible waste management practices to minimize waste generation and maximize recycling and reuse. This includes implementing recycling programs, reducing packaging waste, and responsibly disposing of hazardous materials



FURTHER READING

**Water Policy**  
**Environmental Policy**  
**Biodiversity Policy**



ACT WITH INTEGRITY AS A RESPONSIBLE CORPORATION

# A Positive Impact on Communities

At SNF, we recognize the importance of being a socially responsible organization and positively impacting the communities in which we operate. We are committed to conducting our business ethically and sustainably while actively supporting social causes and initiatives that align with our values and purpose.

SNF affirms its dedication to positively impacting society and fostering a sustainable future.

## We act for

- ✓ Actively engaging with the communities in which we operate, understanding their unique needs, and contributing to their development.
- ✓ Supporting local initiatives and organizations focused on education, healthcare, poverty alleviation, and other social causes aligned with our values.
- ✓ Encouraging employees to volunteer for community projects, fostering civic responsibility and engagement.



FURTHER READING

**Social Commitment Policy**



**SNF**  
WATER SCIENCE

[www.snf.com](http://www.snf.com)