



CSR Charter

December 2021

Preamble and articulation of the Siblu reference frameworks

The purpose of the Siblu CSR charter is to provide an overview, for all the Group's employees and partners, of the intangible principles that provide guidance on how the business acts in relation to subjects of Corporate Social or Environmental Responsibility ("CSR").

In combination with the companies Mission Statement and Values, the CSR Charter is a useful frame of reference to evaluate each of the Group's actions or operational or strategic decisions. It facilitates the prioritisation of actions and helps to avoid actions that are contrary to the intentions expressed in the Charter, based on the principle of "what I should always do / what I should never do".

The CSR Charter, Mission Statement and Values are complementary points of reference that help to define our thinking and action in a way that Siblu wants to operate. The themes covered by the CSR Charter are diverse, each theme is linked to a Siblu Value¹ and aligned with the Mission Statement.

By adopting a CSR Charter, Siblu recognises that, beyond the strong financial performance it has achieved over the last 40 years supporting its solvency, sustainability and independence as a legal entity, a more holistic approach is required. Financial performance should not be achieved to the detriment of its clients, employees, partners or the environment.

CSR Governance and implementation of the Charter

A Siblu CSR committee has been created to ensure that the principles of the CSR Charter are effectively integrated within the group (the "mission"). Under the responsibility of the Group CFO, the Committee is comprised of a minimum of 3 and maximum of 5 members meeting at least four times a year and reporting to the Supervisory Board of the Group.

The main responsibilities of the CSR Committee are:

- To provide expertise on CSR issues informing the Group management team of future trends in this area (operational, technological and regulatory trends)
- To ensure that the Group's strategic direction, decision-making processes and operational activities are coherent with the CSR Charter
- To collect, analyse and validate information required for the publication of an extra-financial performance statement

The resources available to the CSR Committee are the following:

- Authority granted directly by the Supervisory Board to obtain from the Executive Committee of each country, within a timeframe reasonably defined by the CSR Committee, any information or document allowing the Committee to fulfil its duties.

¹ As identified by a word in bold type making up part of the Siblu Values reference framework

- A budget, as approved by the Supervisory Board, which may be used to obtain the (internal or external) technical or human resources needed to fulfil its duties.

Each year, the CSR Committee shall present a report to the Supervisory Board regarding its activities and propose a renewal of the CSR Charter or any amendments thereto.

The CSR Committee is independent and separate from the Audit Committee.

The Siblu CSR Charter is presented on the next two pages.

Siblu CSR Charter

Presentation of the Company and its business

- The Siblu business model shall be described **transparently**, by means of Simple, Meaningful, Relevant, Measurable, and Verifiable financial or non-financial **performance indicators**.
- In any corporate communication, Siblu shall clearly identify its achievements, ongoing actions and intentions to best reflect **its evolution**.

Risk Management

- Siblu shall identify the main risks to its image, business, employees, customers and the environment, potentially caused by its activity.
- An action plan intended to avoid, remove, reduce, or manage and secure the main risks identified shall be prepared each year.
- No opportunities shall be taken (or proposed for approval by the appropriate Governance bodies) without a formal analysis of the related risks.

Governance

- Siblu intends to comply with the general principles of strong governance and good conduct at each level of the organisation. This objective shall be achieved, among other measures, by the existence of formal Delegations of Authority, company policy, a Compliance Officer, an Audit Committee, a monthly Executive Committee meeting for each country and a CSR Committee.
- Any material decision beyond the normal course of business (investment, reorganisation, or other decision) shall be justified and quantified if possible, and may not under any circumstances be dictated by objectives related purely to accounting or tax matters.
- The external growth strategy of the Company shall be based on consistent economic profitability criteria, a strong consensus between the executive management and the Supervisory Board, and on due diligence that does not identify any CSR risks arising from the operation.
- Management bodies shall focus on sustainable growth, protecting the interests of the Group in the long term.

Extra-Financial Performance

- Regarding Environmental matters, Siblu undertakes to:
 - Measure its environmental footprint regularly. Through its own actions, increased customer awareness and **innovation** efforts with suppliers, Siblu will establish realistic and measurable objectives that will reduce its footprint over time (carbon energy, measures to tackle waste and promotion of the circular economy, controlled use of water resources, etc.)

- Beyond risk reduction or remediation, review opportunities to restore or improve the natural environments in which the group operates (biodiversity, tree management, landscape integration etc.)
- Undertake action on its own merits, and not merely for commercial or institutional public relations purposes.
- Communicate on these aspects by means of simple, consistent and verifiable key indicators.
- Regarding Social matters, Siblu undertakes to:
 - Offer a working environment where everyone can **“dream big”** based on their own professional abilities, without discrimination or bias. The suitability of a given profile for a position, will be decided according to the **“One Position / One Remuneration”** principle, and measured annually using the Parity Index.
 - **“Aim for excellence”** regarding Health and Safety, going beyond legal obligations if deemed necessary.
 - Maintain constructive dialogue with all staff representatives, and all Group employees, through a short chain of command and a strong sense of **team spirit**.
- Regarding Societal matters, Siblu undertakes to:
 - Keep in mind its objective to offer its customers and employees moments of **happiness, conviviality and fun**.
 - Be **transparent** when entering into contracts and **caring** with respect to its customers, in particular if they experience difficulties or report business grievances.
 - Adopt a trust based approach with interlocutors or business partners, whether local or national, in keeping with a logic of a sustainable partnership.
 - Throughout the value chain, respect and promote the rights of protection for individuals (GDPR) and business ethics (French **“Sapin II”** and equivalent Laws).

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