

ETHICAL CODES



Séché
environnement

Séché global solutions



Chairman's Address

In 2003, Séché Environnement has joined the Global Compact. This is a voluntary commitment organized by the United Nations, under which businesses, associations and NGOs are invited to comply with ten universally accepted principles on human rights, labor, environment and anti-corruption.

From these guiding principles have derived our own business ethics commitments, expressed in the Group's **Sustainable Development Charter, in Health, Safety, Environment and Quality (HSEQ) Policies** for each site, and in a **Code of Behavior and Actions** which applies to all employees individually.

The rules contained in this Charter, these Policies and this Code are not substitutes for national and international legislation, which the Group must of course always strictly obey. Neither do these commitments have any contractual force; nevertheless, they

must be known by, and applied by, all Group's employees. It is incumbent on every employee to implement them, especially those who hold managerial responsibilities.

It is not a question of trying to foresee every eventuality, or to write rules for every case. However, clear and precise principles, applied with good sense and a responsible attitude, form a useful frame of reference for us all in the Group.

A stylized, handwritten signature in black ink, consisting of a large 'J' and 'S' intertwined.

Joël Séché
Chairman and Chief Executive Officer

January, 2016

Global Compact



Séché Environnement has been a signatory of the United Nations Global Compact since 2003. In 2015, the Global Compact initiative numbers around 13 000 participants, of which 8 300 are businesses. France, with

around 1 100 participants, has been recognized by its peer countries as one of the 10 best national local networks, out of 90 countries in the world. Global Compact participants must report each year on their progress toward achieving effective implementation of the ten principles, in a "Communication on Progress" (COP). Each COP is made publicly available on the Global Compact website. Séché Environnement is one of some 50 French businesses to report at GC Advanced level, which aims to set a high standard of CSR performance and to encourage transparency. This means that the Group demonstrates that it has adopted a range of best practices against 21 criteria, and has been evaluated externally by a COP peer review.

Joël Séché
Chairman and Chief Executive Officer
January, 2016

Human Rights

Businesses are invited to:

- support and respect the protection of internationally proclaimed human rights;
- make sure that they are not complicit in human rights abuses.

Labor

Businesses are invited to:

- uphold freedom of association and effective recognition of the right to collective bargaining;
- eliminate all forms of forced and compulsory labor;
- ensure the effective abolition of child labor;
- eliminate discrimination in respect of employment and occupation.

Environment

Businesses are invited to:

- apply a precautionary approach to environmental challenges;
- undertake initiatives to promote greater environmental responsibility;
- encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Businesses are invited to:

- work against corruption in all its forms, including extortion and bribery.

SUSTAINABLE DEVELOPMENT Charter

7 commitments

to make Séché Environnement
a catalyst of sustainable
development dynamic
for its employees,
its shareholders, its neighbors
and its business partners.



Séché Environnement commits to:

- basing its long-term prosperity on the protection of environment, human health, and responsibility toward people.
- promoting within the Group a true sustainable development attitude, including the primacy of workplace dialog, making employees more aware of sustainable development issues and providing training in them, and organizing its activities in line with this objective.
- acting as sustainable development ambassadors toward customers and suppliers, with a view to promoting sustainable development in terms of both production methods and consumption patterns.
- behaving as a responsible corporate citizen, operating under policies of transparency, continuous improvement and consultation, which take account of stakeholders' legitimate expectations, and always being attentive to changes in society.
- contributing to research and facilitating the development of eco-efficient treatment processes which are increasingly safer in terms of their impact on public health and on environment.
- complying with regulations on hygiene, safety and environment, and even anticipating new ones, by implementing the best practices available at an economically acceptable price.
- ensuring that ethical behavior that complies with laws and international conventions in force is the fundamental rule in its business transactions.

Joël Séché
Chairman and Chief Executive Officer
January, 2016

HSEQ POLICY



Health · Safety · Environment · Quality

- The Group's HSEQ (Health, Safety, Environment and Quality) policy is based on respect for the person and its environment.
- Being able to prevent and control risks require people to identify and evaluate them, people able to provide solutions, and to implement measures decided upon. Risks prevention and control are therefore among the management principles which flow from the fundamentals of total quality.
- In this way, risks prevention and control contribute to improving Séché Environnement's overall performance.
- The main objective is to avoid accidents, disease, and accidental pollution, anywhere and at any time. People, company's properties and its environment are equally concerned.
- Our requirement and professionalism allow us day after day to get closer to these ambitious targets.
- Each Séché Environnement site is responsible for defining its own objectives, steps and necessary controls to be put in place, to be able to drive forward the continuing improvement we are striving to achieve.
- Our internal HSEQ network is there to help with any aspect of this effort.
- Only an individual commitment from everybody can enable the Group to carry out this ambitious HSEQ policy.

Our imperative is to do all we can to reach:

- « zero » accidents,
- « zero » occupational disease,
- « zero » pollution.

To achieve an objective such as this requires us to be attentive at all times.



Joël Séché
Chairman and Chief Executive Officer

January, 2016

CODE OF BEHAVIOUR AND Eight commitments

to make Séché Environnement a catalyst of sustainable development dynamic for its employees, its shareholders, its neighbors and its business partners.



Make the protection of health, environment, and responsibility towards people, conditions of its sustainability.



Promote a real attitude of Corporate Social Responsibility inside sites, prioritizing social dialog, staff awareness and training on Sustainable Development.



Clearly express the Corporate Social Responsibility towards its customers and suppliers, in order to promote Sustainable Development in production as well as in consumption.



Behave as a responsible corporate citizen, aware of changes in society, carrying out a policy of transparency, dialog and continuous improvement, taking into consideration the legitimate expectations of stakeholders.

ACTIONS



Contribute to research and development of waste recovery and treatment processes that are eco-efficient and ever safer in terms of their impact on health and environment.



Respect health, safety and environmental laws and regulations by applying the best techniques available at an economically acceptable cost. Wherever possible, use an active anticipation approach.



Make its behavior, which is ethical and respectful of applicable international laws and conventions, the fundamental rule of its business behavior.



Implement conduct of business rules, detect breaches of rules and use of whistleblowing.

Code updated in 2016 - Commitments 7 and 8 are based on «the business principles for countering bribery» elaborated by Transparency International

Make the protection of health, environment, and responsibility towards people, conditions of its sustainability.

All staff members have the responsibility to ensure that the activities of Séché Environnement which they are in charge of are carried out in compliance with applicable laws and regulations for the protection of health, safety and environment, complemented, where necessary, by internal Group rules.

In order to respect this, all staff members in the Group are involved in an active process of protection, and implement procedures or management methods for sites which make it possible to:

- Give priority to prevention, and implement all useful measures to ensure the best possible protection of health and safety at work, both for the Group' staff members and for those of outside companies;

- Fix measurable objectives for their environmental performances, and assess and monitor these performances regularly, so that corrective measures can be implemented rapidly, where necessary.

Certifications obtained or applied for (ISO 14001, OHSAS 18001) make it possible to take into consideration parameters linked to respecting the environment and to protecting people safety and health, in an organized and recognized manner.



Promote a real attitude of Corporate Social Responsibility inside sites, prioritizing social dialog, staff awareness and training on Sustainable Development.

Séché Environnement scrupulously ensures that employees' rights are respected, and especially prohibits any discrimination because of the origin, sex, sexual orientation, age, disabilities, political or religious opinions, union membership, whether at recruitment, hiring or during the period of the work contract, in France or in any other country.

Respecting people is an absolute condition for the personal and professional development of staff members, who are attentive and mobilized participants in the three dimensions of the Sustainable Development: environmental, social and economic. This respect is shown through listening, information, explanation and dialog, while respecting the private lives of everyone.

Social dialog and Sustainable Development are inseparable; therefore Séché Environnement advocates cooperation with its staff members and their representatives concerning all issues of common interest, and supplies them with high-quality information.

Finally, concepts of loyalty and solidarity are essential for the successful reinforcement of social dialog. This is expressed in the spirit of responsibility that everyone must develop in their professional activities, in order to eliminate individualistic attitudes and favor the valorization of team work by mutual assistance.



Clearly express the Corporate Responsibility towards its customers and suppliers, in order to promote Sustainable Development in production as well as in consumption.

Séché Environnement strives to go beyond the simple satisfaction of the basic waste recovery and treatment needs of its customers, in order to:

- Guarantee to them that tasks entrusted to Séché Environnement will be carried out in the manner that they have the right to expect (management of the environmental and social impacts of its activity, respecting applicable laws and regulations and controlling risks);
- Ensure that service costs are compatible with the general economic environment;
- But also, as a promoter of a Sustainable Development, help the customer to have a positive view of its waste management, which may have originally been seen as a constraint, in order to give the customer the opportunity to become a protector of the environment in its social and corporate universe (contributing to the protection of health and nature).

With its suppliers, Séché Environnement applies a responsible purchasing policy, whose main concepts are a result of the following considerations:

- Production and consumption patterns absolutely have to reduce the environmental and social risks which weigh heavily on the planet today;
- Purchasing is an important lever for spreading good Sustainable Development practices, involving the entire value chain, including suppliers;
- A responsible purchasing policy must favor an approach in terms of global cost.

In this spirit, Séché Environnement develops partnership relationships, in order to optimize the cost/benefit ratios of every operation.



Behave as a responsible corporate citizen, aware of changes in society, carrying out a policy of transparency, dialog and continuous improvement, taking into consideration the legitimate expectations of stakeholders.

As such, Séché Environnement, which is an active participant in the society, respects strict political, religious and philosophical neutrality:

- The Group will not make any financial contribution to political candidates, elected representatives or political parties;
- Staff members, may, of course, take part in political life in a private capacity, outside the workplace and while off duty, but they may not use the image of the Group in support of their own political involvement;
- The Group limits its participation to the financing of associations, foundations or sponsorship operations, where permitted by applicable laws and regulations, in the framework of the values and priorities defined by the Group.

Contrary to these restrictive and prudent positions, the Group is involved in proactive relationships :

- With its shareholders, by keeping financial markets informed by any appropriate means, of any event or information that might influence the price of its shares. At the same time, its staff members, who might, due to their functions, have access to privileged information, i.e. information not known to the public, are committed to respecting the rules of the Group's Stock Market Code of Conduct where their own operations on financial markets are concerned;
- With its other stakeholders (such as neighbors, public authorities, the world of education and associations, etc.), to establish close relationships, which are particularly expressed by:
 - the opening of sites to the greatest number of people;
 - staff members who pay attention to local preoccupations and expectations, and are involved in cooperation with educational establishments;
 - preference given to local employment.



Contribute to research and development of waste recovery and treatment processes that are eco-efficient and ever safer in terms of their impact on health and environment.

Séché Environnement is committed to carrying out a policy of investment, research and development that leads to a permanent improvement in its industrial installations and processes, with the aim of making the systems used safer and limiting their impacts.

The desire to strive towards the best possible eco-efficiency makes it necessary for all staff members to use their professional skills at the best possible level, in a spirit of solidarity, which involves:

- Regular monitoring of best practices inside and outside the Group;
- Organization and use of all feedback;
- Targeted training programs;
- A method for working in networks, which is a source of cross-fertilization, encouraging the optimization of skills and means in every case.



Respect

health, safety and environmental laws and regulations by applying the best techniques available at an economically acceptable cost. Wherever possible, use an active anticipation approach.

Séché Environnement is committed to implementing an active environmental, health and safety at the workplace policy, and to ensuring that it is constantly applied; subcontractors working on its sites are requested to have the same level of vigilance:

- Anticipation, thanks to appropriate monitoring;
- Use of the best available techniques;
- Ability to listen to staff members;
- Rigorous assessment of their working conditions;
- Feedback.

They require responsiveness, curiosity, discussion, continually putting the knowledge, techniques and expectations of everyone into question, whether they are employees or other stakeholders.



Make its behavior, which is ethical and respectful of applicable international laws and conventions, the fundamental rule of its business behavior.

Staff members must not accept gifts, remunerations or other benefits from a competitor, customer or supplier of the Group, nor give any gifts, remunerations or other benefits to them. Only gifts or invitations that are within acceptable limits with regard to customs and anti- corruption laws may be tolerated. Under no circumstances is a staff member authorized to solicit a gift or an invitation.

It is forbidden in any country to pay, to offer or accept to pay bribes or offer unjustified advantages to a public official or a private person, either directly or through an intermediary, with the aim of obtaining favorable treatment or to influence the results of a negotiation in which the Group has an interest. These practices are contrary to the law and to the international convention for the fight against corruption in most countries.

Ethics and integrity require the total integrity of everyone in their professional activities. Every staff member must avoid any situation of conflict between the Group's interests and its personal interests or those of its relatives and friends. Thus, everyone is forbidden from having an interest in a supplier or a customer, except if it is made by purchasing shares in the framework of the management of a share portfolio, respecting the rules that forbid the use of privileged information.

In the same way, it is forbidden to work for an existing or potential competitor, customer or supplier without the permission of the Group.



Implement conduct of business rules, detect breaches of rules and use of whistleblowing.

Séché Environnement's Code of behavior and actions is communicated to all the Group's staff members. They may also be communicated outside the Group, when necessary, and especially to its customers, suppliers and shareholders.

The rules in this Code must be applied by all the Group's employees. This contributes to developing a culture of responsibility, in the framework of a commitment by the Group to strictly respect laws and regulations and the principles of good corporate governance.

If this Code is unclear or incomplete in certain situations, it is the responsibility of every staff member to contact its superior to find out which procedure must be followed. Finally, this Code includes a certain number of legal obligations. If they are not respected, this may be considered as a breach of the rules, which is liable to lead to disciplinary measures, according to the regulations in every country.

The field of application of whistleblowing is limited to acts contrary to laws and regulations, to those that have a serious effect on the operating rules of society in general, or on a particular community to which the whistleblower belongs.

Whistleblowing by a staff member is carried out in an identified manner, in exchange for a commitment of confidentiality. The implementation of whistleblowing requires a strong sense of responsibility of everyone, and is based on the staff member's own ethical code. It can only work with factual information that are communicated "in good faith".



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