



# Snetor

ETHICS &  
COMPLIANCE

Dear Employee, Partner, Contractor, or Supplier:

Since 1981, Snetor has been a leading player in the markets of plastic materials and chemical products.

The Snetor Group has strived to build a reputation founded on the principals of **dependability** and **professionalism** within all of its affaires, on its **expertise** of markets, and on its **availability** with internal and external relationships.

It is also our goal to be an exemplary company. Ethics is at the heart of our organization and of our profession.

This is why we have formalized a Code of Ethics. This code is built on four main values:

- **RESPECT**
- **REACTIVITY**
- **COLLABORATION**
- **INTEGRITY**

By infusing these values into the company, we believe that we are able not only to maintain a foundation upon which we achieve our aspirations, but that we are also able to build lasting character into the hearts of our employees and personnel.

We appreciate your dedication to this Code of Ethics and your help in maintaining and improving Snetor's good reputation.

Best regards,

Emmanuel AUBOURG,  
President

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### Business Information Confidentiality

All information within our possession is treated with the highest level of confidentiality and with full compliance to the law.

- We ensure that our suppliers and consultants adhere to our same confidentiality and data privacy policies.

### Personal Information Confidentiality

The Snetor Group ensures that privacy of personal information is enforced.

- We respect all laws relative to the collection, usage and protection of confidential information
- Personal information would only be used in a professional and legal setting.

## Company Property and Records

The use of company resources for personal benefit or by unauthorized use is prohibited.

- We do not tamper or falsify company property or records.
- We keep accurate records of all financial/non-financial company materials.
- Personal use of company electronics (internet, email and telephone) is done with the respect to policies found on Snetor's information chart.
- We do not use company property or financial resources for actions that could cause conflict of interests or for that which is illegal

If we believe that a conflict of interest may exist in a certain situation, we abstain from the activity concerned and then quickly disclose this situation to the Compliance Department.

## Whistleblowing

In order to prevent any unethical behavior, employees and external stakeholders are able to report concerns of irregular conduct through the company's compliance department.

- All complaints are taken into consideration and reported to the Compliance Director and action is taken if need.
- We ensure employee confidentiality in order to have more transparency during the process.

Employees will cooperate fully with the process.

- Contact :
  - Hotline Telephone : 01.49.04.43.05 (direct line) et °251 (internal personnel)
  - E-mail : [compliance@snetor.fr](mailto:compliance@snetor.fr)

## Relations with Government, International Organizations and the Community

In the best interest of the company, we respect legal and ethical provisions.

- We don't favor any particular political party, group or individual
- We do not engage in party political matters and do not make election payments
- Our employees and contractors have the individual right to support whichever political party/candidate they wish, but this support is to be done in their own time and with their own money

## Diversity and Inclusion

Snetor recognizes the value of a diverse workforce. We strive to leverage these different backgrounds, languages, experiences and perspectives in our comprehensive strategy.

- We do not discriminate including against race, gender, religion or age. Our evaluation criteria is solely based on the professional competencies of each individual.
- We ensure that there is no difference of treatment for men and women, whether including it be for job positions, leadership opportunities, promotion, or salary amounts.



## Kickbacks and Bribery

We do not tolerate bribery or corruption in any way or form.

- We comply to all acceptable anti-bribery and corruption laws such as the UK bribery Act 2010 and the US Foreign and Corrupt Policies Act
- We do not buy favors, no matter where we are, no matter the relationship with the client, and no matter the situation
- We never give or accept any financial favor to secure business or to have any other advantage

## Gift Giving and Receiving

Here at Snetor, we remain objective in all our business relationships.

- It is prohibited to accept/offer gifts that:
  - Are given in secret
  - Are given during any business negotiation
  - Are illegal
  - Cause you to feel an obligation
  - Influence or give the appearance of influencing business judgement
  - Are given as a part of an agreement to do something expected in return
- Some examples of gifts that are appropriate include, but are not limited to:
  - Entertainment such as a simple dinner invitation
  - In any case it would be considered impolite not to accept an invitation

## CONTACT US



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