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SNCF GROUP ETHICS CHARTER

Group Ethics Department





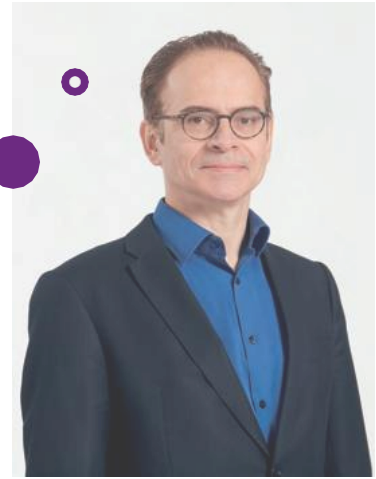
INTRO

Ethics are everyone's responsibility. They guide our individual behaviours and help the company clarify its strategic decisions. Each individual's behaviour is an essential component of our image, reputation and the trust we inspire in our stakeholders: setting the example, acting with integrity and respecting each individual are therefore essential ethical values.

And so, beyond the legislative and regulatory obligations applicable in the countries in which the SNCF Group operates, the guiding principle for conducting our business is a commitment to the goal of respect for human capital, business ethics and requirements in terms of social, societal and environmental responsibility.

To ensure that everyone knows what is expected of them, this Charter groups together the ethical principles that should guide our actions and behaviour on a daily basis. Adhering to these principles is an essential part of protecting the company and all of its employees. This Ethics Charter should help to guide us in our adoption of and adherence to simple behaviours based on respect, kindness, tolerance and trust. It is a common frame of reference for each employee to consciously commit to and embody the values of the SNCF Group.

Jean-Pierre FARANDOU
Chairman and CEO



This version of the Group Ethics Charter has been updated to align it with the organisational and governance changes that have taken place within the SNCF Group since 2016.

In addition to unchanged content that remains fully relevant, it provides a simple overview, with practical examples, of the ethical values and principles to guide the behaviour of all within the SNCF Group, especially in terms of setting the example, acting with integrity and respecting others.

We must never lose sight of the fact that any violation of the Group's ethical values and principles can not only have detrimental consequences for employees, but also for the reputation of a company tasked with overseeing a prominent public service like the SNCF, which occupies a very unique place in French society.

Please take the time to carefully read this Charter, find the answers to any questions you may have, and ensure you engage in ethical practices in your day-to-day duties.

If you are ever faced with an ethical dilemma at work, take a step back and act with discretion. And remember: if in doubt, seek advice. Would your action or decision comply with both the law and this Ethics Charter? Would you be willing to take responsibility for your action or decision in a fully transparent manner?

Upholding ethical standards in the company is in everyone's best interests.

Iohann LE FRAPPER

Group Chief Ethics Officer

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SUMMARY

Creating a Public Railway Group presented an opportunity to reaffirm and strengthen our ethical commitments – a key factor in our operational success.

As a state-owned, public service company, our core mission is to deliver seamless, sustainable, door-to-door mobility for everyone, everywhere. Keeping our passengers and employees safe, operating a high-performance network, ensuring our trains run on time, and improving passenger information are the top priorities of SNCF. As we make SNCF more connected, more responsive and more efficient, we are able to offer increasingly personalised services and give each of you more individual attention.

Our mission is to simplify travel, deliver seamless, sustainable passenger and freight services, and develop the mobility of the future.

In view of the major challenges facing SNCF and its subsidiaries, it is essential, in terms of motivating the entire workforce, that the Group's management and employees come together around common ethical values, and share the same rules of conduct.



Reaffirm and strengthen our ethical commitments – a key factor in our operational success.



This requirement is all the more imperative since the SNCF Group, like other large groups, is facing more and more risks and increasingly stringent legislation, with very severe penalties imposed for any breaches. All our employees must be aware of this and understand it, and make a conscious effort to integrate the ethical dimension into their duties at work.

These are the reasons why in 2016 this SNCF Group Ethics Charter was presented to the Boards of Directors of SNCF Mobilités and SNCF Réseau, and approved by the Supervisory Board of SNCF EPIC.

This Ethics Charter is designed to:

- Highlight the five ethical values chosen by Group employees following a survey carried out among a broad cross-section of them, namely: Integrity, Responsibility, Respect for the individual, Trust and Courage.
- Outline a series of eleven principles of professional conduct, the first ten of which concern all Group employees, and the eleventh is specifically for employees of the five SNCF companies: Société Nationale SNCF Holding, SNCF Voyageurs, SNCF Réseau, Fret SNCF, SNCF Gares et Connexions and subsidiaries with a direct public service remit.

These principles explain what we must do (obligations) and what we must not do (prohibitions), and deal with:

- Protecting the Group's human capital;
- Preventing and combating corruption;
- Combating fraud;
- Complying with competition law;
- Conflicts of interest;
- Protecting confidential information and personal data;
- Ensuring honest management of SNCF funds and assets;
- Reducing our environmental footprint;
- Our obligations as a socially responsible and accountable Group;
- The ethical standards of our suppliers, service providers and partners;
- The specific duties of providing public services (secularism and neutrality, equal treatment, good faith and discretion).

Most of these principles are illustrated by practical examples.

The role of the Group Ethics Department is to explain the contents of the Charter and support employees in putting its values and principles into practice.

Dominique LAMOUREUX
Group Ethics Committee Chairman

Iohann LE FRAPPER
Group Chief Ethics Officer



SCOPE OF ETHICS CHARTER

The Ethics Charter, signed by the Chairman and CEO of SNCF SA, applies to all SNCF Group employees, that is the managers and employees of the five SNCF companies: Société Nationale SNCF Holding, SNCF Voyageurs, SNCF Réseau, Fret SNCF, SNCF Gares et Connexions that make up the “**SNCF companies**”, as well as their subsidiaries, regardless of their level of responsibility and status.

This scope of application is referred to as the “**SNCF Group**” in the Charter.

This Charter also serves as the core ethical reference document for relations with our stakeholders, and is not exhaustive in itself. Consequently, some of the principles it sets out are covered by other specific guides.



Subsidiary companies may also supplement the Charter with their own ethical codes or guidelines, in order to cover the specific nature of the activities they carry out in foreign countries, provided that they ensure these documents are consistent with the Charter.

The Ethics Charter is available on the corporate website of the SNCF Group in French and in English. The French version serves as the reference document for employees working in France and French-speaking countries, while the English version serves as the reference document for other countries.



OUR ETHICAL VALUES

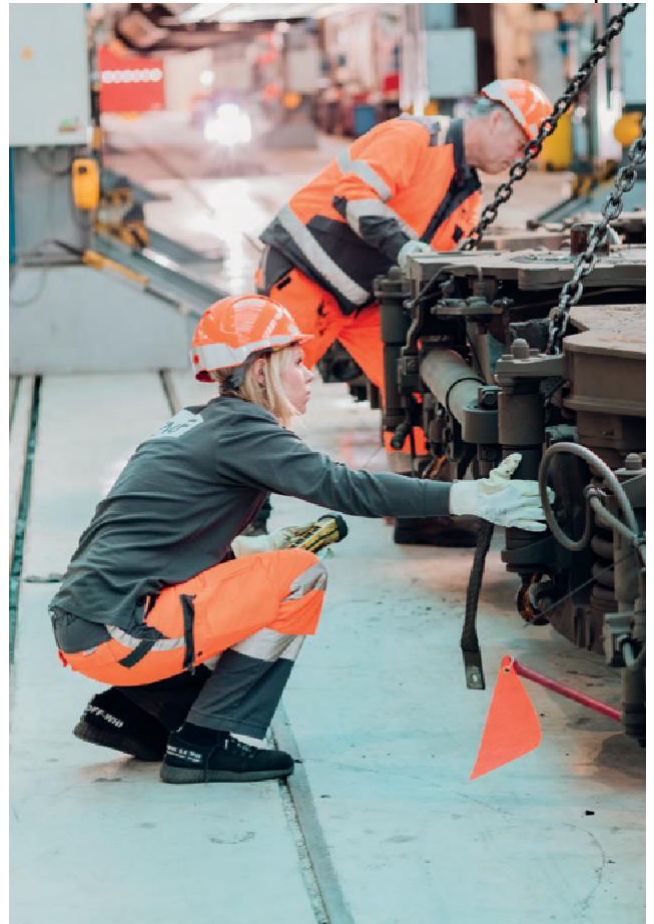
01 **Integrity**

02 **Responsibility**

03 **Respect for
the individual**

04 **Trust**

05 **Courage**



Our five ethical values express the way we want to work within the company and with all our stakeholders: customers, suppliers, partners and civil society.

Their intended ambit is universal for all SNCF Group employees, which means that they must inspire our collective conduct within the SNCF Group.

01

INTEGRITY is about being honest with both ourselves and others, being impartial, and not acting in our own interest to the detriment of the common interest. Integrity is also about officially excluding all forms of fraud, corruption, favouritism or influence peddling from our professional conduct.

The SNCF Group fully assumes its high-profile corporate social and environmental **RESPONSABILITY**, especially in terms of customer and employee safety, the quality of working life, and regional planning and development. Acting responsibly is about accepting the consequences of our actions: anticipating and controlling them, and accounting for them. Therefore, it is crucial to foster a culture of dialogue and understanding with those who may be affected by our decisions, namely our colleagues, customers, suppliers and corporate partners.

02

03

RESPECTING PEOPLE is about making sure their working conditions are good, and ensuring their safety and dignity. It is also about being kind, considerate and attentive to our fellow workers, suppliers, partners and customers. This creates a climate of mutual respect, in which every individual feels accepted and not discriminated against, resulting in a wealth of diversity within the Group.

TRUST is built up over time through genuine, honest and professional relations.

Acting in good faith and honouring our commitments helps to establish and maintain the trust of our colleagues and stakeholders (customers, service providers, suppliers, local and regional authorities, public institutions, etc.).

04

05

COURAGE in management, courage to do our job, courage to tackle problems, put forward proposals and make the right decisions: we all need courage to face up to difficult situations and take the right action, to not act hastily but with determination, strength of character and a sense of fairness, even if this is not always the easiest option.

THE THREE KEYS

TO ETHICAL CONDUCT

BE DISCREET, SEEK ADVICE, RAISE THE ALARM

01

Being discreet

If an employee is ever faced with an ethical dilemma or has doubts about an action or decision they have to take, and does not find the answer in the Ethics Charter, the first thing they should do is apply the “Golden Rule” of asking the following four questions:

- Will my action or decision comply with the law?
- Will my action or decision comply with the SNCF Group Ethics Charter or the anti-corruption Code of Conduct?
- Could my action or decision have a negative impact on my company, my professional circle or my stakeholders?
- Would I be willing to take responsibility for my action or decision in a fully transparent manner?

02

Seeking advice

If the ethical dilemma or doubts persist, advice should be sought from the appropriate people: line management, HR Dept., Legal Dept., or Ethics Dept.

The Group Ethics Dept. provides an advice and support service (see “Useful links” at end of Charter), which will respond to enquiries from any Group employee, and provide guidance and assistance on the action and decision that should be taken.



03

Raising the alarm

Lastly, if an employee is duped by or witnesses conduct that they find unethical, they can use the internal whistleblowing system, which notifies the Group Ethics Department:
www.alerteethiquesncf.com



MAIN FEATURES OF THE INTERNAL WHISTLEBLOWING SYSTEM

This system allows any employee of SNCF companies and their subsidiaries (except those with their own whistleblowing system) to report to the Group Ethics Department any facts or actions that are unlawful, contrary to the Code of Conduct for preventing and combating corruption and influence peddling, or the Ethics Charter, or that are likely to harm the business or reputation of an SNCF Group entity.

The facts or actions that can be reported include, but are not limited to breaches of honesty (fraud, corruption, financial embezzlement or wrongdoing, theft, deceit, breach of trust, etc.), damage to the environment, violations of personal safety or human rights and fundamental freedoms (dangerous situations, forced labour, harassment or bullying, discrimination, etc.), or the misuse or diversion of the Group's assets or means of communication.

The identity of the whistleblower remains strictly confidential, unless the right to confidentiality is waived by the whistleblower themselves for the purposes of an internal investigation.

Any whistleblower acting in good faith will be protected against all forms of risk and reprisals. However, if someone reports something improperly, to waste time or with the intention of harming the reputation of an individual or legal entity, it may result in disciplinary action being brought against the perpetrator or incur their civil and criminal liability.

 **For more info, see:**

-  Whistleblowing Guide - RA00124

AN ESSENTIAL PREREQUISITE

RESPECTING THE RULE OF LAW AND HUMAN RIGHTS

In France and in all countries in which it operates, the SNCF Group carries out its activities in full compliance with the laws and regulations that apply there. Consequently, employees are forbidden from acting or behaving in any way that could constitute a breach of these laws and regulations and give rise to disciplinary or legal actions.

Violations of human rights and fundamental freedoms, failure to comply with the rules governing child labour, and acts of corruption will not be tolerated under any circumstances.

These laws and regulations constitute the legal framework in which the Group operates and should not be seen in any way as hampering its activities, but rather as a means of leveraging its development.



11 PRINCIPLES OF ETHICAL CONDUCT

Our ethical values are broken down into eleven principles of conduct, which consist of:

01 Protect the Group's human capital;

02 Prevent and combat corruption and influence peddling;

03 Combat fraud;

04 Comply with competition law;

05 Avoid conflicts of interest;

06 Protect personal data and confidential information;

07 Meticulously manage and use the funds and assets of the SNCF Group;

08 Reduce our environmental footprint;

09 Be a socially responsible corporate citizen;

10 Ensure that our suppliers, service providers and partners enforce equivalent ethical standards;

11 Assume the specific duties of public services (secularism and neutrality, equal treatment, good faith and discretion).

0

PROTECTING THE GROUP'S HUMAN CAPITAL

A Group that employs hundreds of thousands of people has a special responsibility towards each of them.

It must protect this human capital, which is essential to the development of its activities, and ensure that the working environment of each and every employee is safe, healthy and harmonious.

It is a Group responsibility that each of us must also contribute to on a daily basis.

270,000
EMPLOYEES



We must...

Ensure that working conditions comply with the regulations and respect human rights and fundamental freedoms.

Treat each and every employee fairly.

Ensure that the standards of conduct that we and others uphold guarantee respect for individuals, their privacy and their diversity.

Support the Group's commitment to diversity and equal opportunities, and be particularly vigilant when it comes to preventing and ending discrimination on the grounds of gender, age, health status, disability, real or perceived belonging to an ethnic group, nation, race or religion, sexual orientation, physical appearance, or trade union activities.

Ensure that new employees are properly inducted into the Group by introducing them to the values and principles of ethical conduct set out in this Charter.



We must not...

Engage in or tolerate behaviour or remarks that could be construed as psychological or sexual harassment, gender-based discrimination or misconduct, whether at the time of hiring new staff or when making any decisions related to training, promotion, and working conditions in general.

Deface or allow the defacement of SNCF premises with materials or texts of a degrading, offensive or abusive nature.

Engage in or tolerate demeaning or insulting behaviour or remarks (racist, sexist, homophobic, etc.).



For more info, see:

- Internal rules - SNCF Holding and other companies (RRH07000).
- "Ethics in practice" factsheets on psychological harassment, sexual harassment and personal data.
- Guide to Preventing and raising awareness of sexual harassment.
- Guide to Preventing and raising awareness of psychological harassment in the workplace.
- "Making diversity a day-to-day reality" guide.
- "Making social, racial and gender diversity a day-to-day reality" awareness-raising kit.

PRACTICAL EXAMPLES

Discrimination



“

As a manager I am asked to integrate a disabled person into my team. Even though I am fully aware of the issues of non-discrimination, I'm still worried that this person's performance will not be on par with the other members of my team, and that I will probably make allowances for them, which carries the risk of arousing jealous or hostile reactions from the other team members.

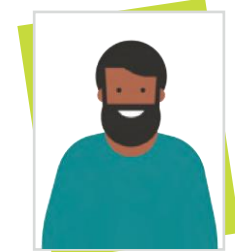
So, I am tempted to rule out this person on the grounds that they do not have the profile and skills required for the position.

”

Is this the right thing to do?

No. This reasoning is based on preconceived ideas. Experience shows that the inclusion of disabled people does not lead to differences in working relations. The only criterion to be taken into account in the recruitment process is the candidate's professional skills; then it is just a case of ensuring the availability of a workstation that is compatible with the person's disability, bearing in mind that adaptations can be made, if necessary.

Sexual harassment



“

A tutor has been abusing his managerial position by soliciting favours from a girl on a work-study contract. I am the site manager, so the girl gets in touch to say that the tutor had been texting her like thirty times a day for more than a month - especially in the evenings after work, and that the content was inappropriate:

- He bombarded her with compliments or remarks about her dress sense;
- He invited her to spend the weekend at his place;
- He sent her pictures of his house.

She says she feels uncomfortable but would not dare challenge him because he has promised her a job at the end of her work-study contract, and he will be grading her work for her diploma.

”

What should I do?

These are serious allegations since they constitute sexual harassment, which is a criminal offence in France. Therefore, the site manager must immediately initiate a reporting process, send a request for written explanations to the tutor if the facts are undisputed, and then start disciplinary proceedings. In the meantime, the tutor and the person on the work-study contract must be immediately placed in separate working environments.

02

PREVENTING AND COMBATING CORRUPTION AND INFLUENCE PEDDLING

Corruption consists of offering, promising, giving, consenting to give or authorising payment, directly or indirectly, of money or any other benefit of any kind, to a third party with the aim of influencing a commercial transaction or decision, or consenting to or accepting any benefit that conflicts with official duties and the rights of others.

Corruption and influence peddling create inequalities and undermine the trust of stakeholders, whether they are investors, customers or the general public. They may give rise to disciplinary and criminal sanctions, among others.

As a signatory to the UN Global Compact, the 10th principle of which states that businesses should act to combat corruption, the SNCF Group therefore rejects corruption in all its forms and applies a zero-tolerance policy in this regard.

The Group prohibits any form of corruption in its business transactions and complies with international conventions to combat corruption and the anti-corruption laws in the countries in which it operates.



We must...

Strictly comply with international conventions, in particular the

Anti-Bribery Convention of the Organisation for Economic Cooperation and Development (OECD), and national provisions such as French law, the US Foreign Corrupt Practices Act, the UK Bribery Act 2010, etc., which prohibit all forms of bribery and corruption.

Conduct third-party assessment procedures to verify that our business partners and intermediaries are acting lawfully and honestly. If the results raise serious doubts, we accept losing the business, do not execute a contract with a supplier or intermediary, or terminate a contract.

Comply with the code of conduct for preventing and combating corruption and influence peddling and absolutely refuse all forms of corruption, in particular offering or accepting gifts or benefits to obtain or consent to an undue favour, such as paying for a favourable intervention by an intermediary with a decision-making authority, or with the aim of evading, simplifying or shortening administrative, customs or tax formalities.

Conduct internal or external audits to verify that all our accounting, treasury, sponsorship, patronage, associative partnership, communication or advertising operations do not conceal activities that could be construed as corrupt.



We must not...

Request, or accept any payment, gift or benefit from a supplier, service provider or candidate in exchange for a decision or action that would be unduly made in their favour, such as preferential treatment in handing out a contract, an authorisation, a job, abusing a privilege, etc.

Offer to, or accept from a public official or partner any payment, gift or benefit in exchange for a decision or action that would be unduly made in their favour, such as preferential treatment in handing out a contract, an authorisation, a job, abusing a privilege, etc.



For more info, see:

- Anti-Corruption Code of Conduct “Code of Conduct for preventing and combating corruption and influence peddling” (RA00507).
- Practical guide on “Gifts and invitations”. ●
- Group Ethics Charter for Purchasing.
- Online: Transparency International France: <http://www.transparency-france.org/>
- UN Global Compact: <https://www.unglobalcompact.org/what-is-gc/our-work/governance/anti-corruption>

PRACTICAL EXAMPLE

“



A supplier with a major contract at my site, and who is also interested in other future contracts, has invited me to go with him to Madrid to see the next football match between the French and Spanish national teams, with flights, hotel and meals included. Since I am a keen supporter of the French national team, and have never had the opportunity to go to one of their matches abroad, I am quite tempted to accept the invitation.

”

What should I do?

Apply the principle of transparency. I discuss it with my line manager, a purchasing manager, or a compliance officer from the Group Ethics Department. To avoid any suspicion of corruption, I am obliged to turn down the invitation, and inform the supplier of our corporate rules on gifts and invitations.

03

COMBATING FRAUD

Fraud is an intentional act designed to deliberately deceive others with the intention of obtaining an illegitimate benefit, or circumventing legal obligations or professional rules.

It is usually committed in two ways: simply stealing funds, assets or property directly from the company; or devising schemes to conceal or falsify documents in order to improperly obtain these funds, assets or property.



We must...

Familiarise ourselves with and uphold the internal fraud prevention policies and procedures;

Adhere to the rules governing the segregation of duties (decision-maker and controller), delegation of powers, signing authority and double checking;

Ensure all transactions are fully traceable and accounts are accurate;

Validate the reality of all business expenses reimbursed by the SNCF Group.



We must not...

Misappropriate SNCF Group funds, products or materials;

Misrepresent quantities in order to obtain undue financial or other considerations from service providers or suppliers;

Destroy supporting documents, falsify accounting or banking records or documents, omit compulsory formalities to conceal unlawful acts or personal gain;

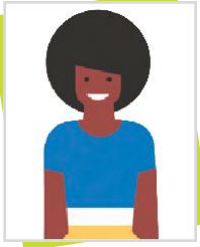
Deliberately create discrepancies between the amounts and periods recorded for inflows and outflows of funds, in order to conceal funding shortfalls or grant oneself undue payment facilities (investment fraud).



For more info, see:

- Practical guide on “Internal fraud”

PRACTICAL EXAMPLE



“

My line manager has delegated powers to purchase services up to €500k, and has sub-delegated his powers to me to spend up to €150k on these purchases. A colleague contacts me and insists that I urgently sign off on a purchase worth €300k, as my manager is away for a few days.

I actually consider signing, telling myself that it is just a matter of internal rules on the delegation of powers, and that I am sufficiently competent to sign off on this purchase.

”

Should I do it?

No. By doing so, I would be ignoring the Group's rules governing the delegation of powers, and could even be complicit in a fraudulent operation. I could also create serious legal headaches for the Group because, if problems were to arise from services purchased in this way, the service provider could try to release itself from its obligations by asserting that the signature of the SNCF representative was invalid owing to my lack of delegated powers, which would be grounds to nullify the contract.



04

COMPLYING WITH COMPETITION LAW

The purpose of competition law is to allow economic players and customers to have access to a variety of products and services at competitive prices.

Therefore, companies are required to act fairly in the market and not engage in any initiatives that are likely to distort competition.



We must...

Comply with the free competition rules applicable in France and in all the countries in which we operate.

Strictly adhere to the current SNCF Group procurement rules and principles, and after that, follow the criteria for concluding negotiated contracts or imposing tender processes.

Act fairly towards our competitors, partners, service providers and suppliers.



We must not...

Enter into agreements with competitors in order to fix the prices of products or services, share markets, restrict market access, or distort any tendering processes.

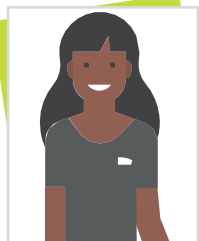
Give any given supplier or service provider preferential treatment, such as providing inside information on our prices, techniques or practices.

Take advantage of a dominant market position to hinder the development of competitors in this market, or seek undue benefits from economically

dependent suppliers or service providers.

PRACTICAL EXAMPLE

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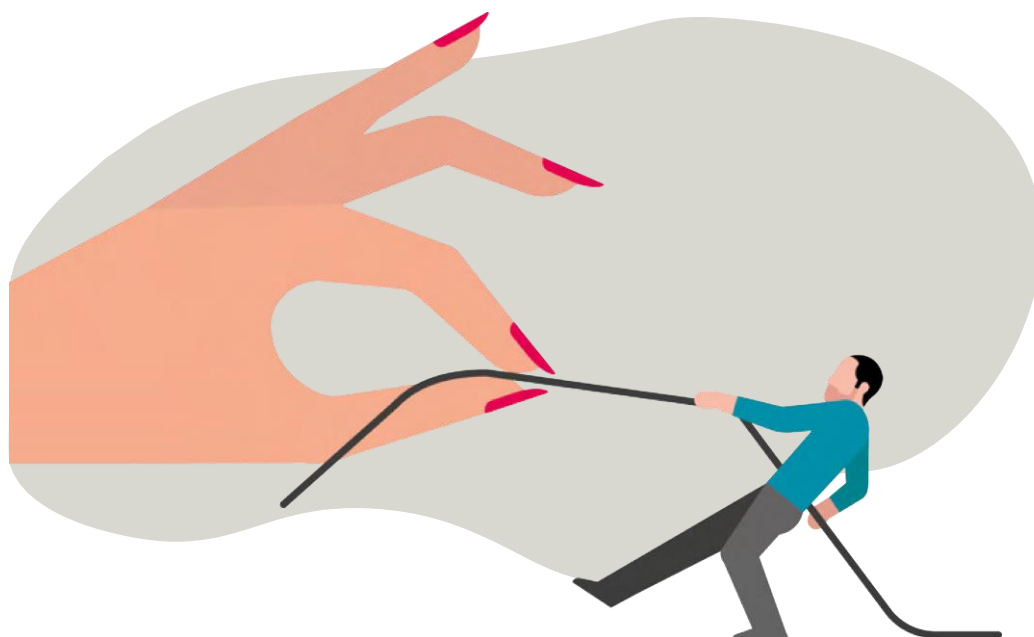


At a trade fair, I notice that several documents clearly showing the price lists and financial projections of one of our competitors have been accidentally left lying on one of their stands. I am seriously tempted to take a look, as this information would be very valuable indeed for this line of business of the SNCF Group, who could use it to improve its market position.

”

Should I do it?

No. This action would be contrary to the ethical standards of the SNCF Group and could seriously damage its reputation, because it would constitute a theft of documents and put the Group in a totally unfair position, which would give it an unfair advantage in this market, restrict free competition and therefore violate competition law.



05

AVOIDING CONFLICTS OF INTEREST

Regardless of our position and seniority in the Group, we can all find ourselves faced with a conflict of interest if our own self-interest is at odds with the objective and impartial performance of our professional duties.

This self-interest may involve a personal relationship, the prospect of a benefit or gain for ourself or someone close to us, or even accepting a gift that makes us feel beholden.



We must...

Identify risky situations before they arise, for example: are you going to be involved in a decision for the SNCF Group in an area where you have a potentially conflicting outside activity, financial interests, personal relationship with a supplier or service provider, public authority, association, job applicant, etc.?

Always be transparent about these situations and report them to your line manager, an HR manager or a compliance officer from the Group Ethics Department.

Ask for someone to take your place in these situations during the negotiations and signing of the contract, do not attend the meeting where the decision will be taken, and generally speaking, do not get involved in the pre-contractual process.



We must not...

Engage in outside activities that conflict with the Group or help its competitors.

Maintain a special relationship with one of the Group's suppliers, service providers or subcontractors that makes us dependent on them and is likely to lead to unfair treatment compared to others.

Take part in any process for selecting a supplier or service provider when there are personal connections (relative, friend, etc.) with a manager of this supplier or service provider participating in this process.

Use a position to influence Group decisions in order to obtain an unfair benefit (financial or otherwise) for ourself, a family member or any individual or legal person with a personal connection.

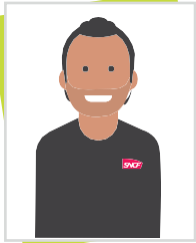


For more info, see:

- Awareness guide on Conflicts of interest ●
- Practical guide on "Conflicts of interest".

PRACTICAL EXAMPLE

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As part of my job, I am required to help select companies bidding in our tender processes for IT services. My cousin is the Operations Manager for one of the companies bidding.

Even so, I still plan to assess this company's bid because I am honest person and do not think I will give this company an unfair advantage over any other company bidding in the process.

”

Is this the right thing to do?

No. Even though you think you would act honestly, to ensure that the tender process is conducted transparently and thoroughly, it is important that no suspicions arise that this company is given any sort of unfair advantage over the other companies in the process.

If your cousin's company is awarded the contract, this outcome could be challenged by a competitor if they were to find out about this family connection. Your internal credibility and legitimacy may also be called into question by your colleagues, who will find it hard to believe the objective nature of your cousin's company being chosen. In this sort of situation, always report a personal relationship to your line manager and do not participate in the tender process.



06

PROTECTING PERSONAL DATA AND CONFIDENTIAL INFORMATION

The information we have access to as part of our jobs does not belong to us. It belongs to either the SNCF Group or third parties, and may be very valuable.

Before sharing this information or revealing its content to any colleagues or third parties, always consider the status of this information, whether or not it is strategic, its degree of sensitivity, and the pertinence of the colleague or third party that will receive it.



We must...

Protect the confidential information of our customers, service providers and suppliers.

Protect the know-how, economic, commercial or strategic information and technical data of the SNCF Group, primarily by adhering to the rules for using and disseminating this information.

Familiarise ourselves with and uphold the standards for protecting information assets: ensure that documents are classified correctly and adhere to the principles for protecting and marking these documents (Recommendation specific to SNCF companies).

Observe the legal rules governing the use of data to identify individuals (employees, suppliers, service providers, partners or customers), the security of this data, transmitting this data and the mandatory retention period for this data. Failure to comply with these rules may result in criminal penalties.



We must not...

Use social networks, or any other channel accessible to third parties, to share company standards or internal documents such as reports, notes, financial statements.

Disclose, in any form whatsoever, any elements of a patent or trademark, and more generally, any element of intellectual property belonging to the SNCF Group that is strictly protected as such.

Reveal our user IDs and passwords for our IT business systems or digital tools to any unauthorised colleagues or third parties.

Provide the personal data of employees, suppliers, service providers and partners to any colleagues or third parties who are not authorised to access or make use of it.



For more info, see:

- Standard for Protecting SNCF Group information assets.
- Standard for the Security policy of Group IT systems.
- Guide for “Social Networks”.
- Guide for Protecting personal data.

PRACTICAL EXAMPLE

“



I am at a trade fair on railway equipment and have to give a presentation to participants on changes to maintenance rules for high-speed TGV trains. Many of the people attending are not necessarily part of the SNCF Group, and I want to use an internal document classified as “Confidential: Restricted Distribution”.

”

Can I do this?

No. In view of the document’s classification, it is likely to contain high-stake business information, and could also contain economic or forecast assessments. I can only divulge it to legally recognised third parties and only after formal approval by my senior management team.

Therefore, I must submit my draft presentation to the senior management team before the trade fair takes place, and obtain its explicit agreement.



07

METICULOUSLY AND HONESTLY MANAGING AND USING SNCF GROUP FUNDS AND ASSETS

The SNCF Group provides us with the resources, means and tools needed to carry out our professional duties.

These elements are the Group's property, which means that we must meticulously and honestly manage and use them.



We must...

Ensure the legitimate use of all funds, assets, resources and tools placed at our disposal by the SNCF Group for the purposes of our professional duties and tasks.

Meticulously manage, operate and maintain equipment to ensure the safety of staff, customers and third parties.

Use Group assets and resources honestly and for their intended purpose only. Some resources such as computers, tablets and smartphones may be authorised for private use, but this usage must remain reasonable and marginal in relation to the professional allocation.

Ensure the proper use of information systems, by checking that permissions for these systems are subject to regular review, among other things.



We must not...

Misappropriate or use for private purposes SNCF Group assets placed at our disposal (tools, service vehicles, business cards, tablets, smartphones, etc.).

Use the Group's information systems in such a way as to jeopardise the proper functioning or security of these systems.

Use SNCF Group information systems or digital tools for improper or illegal purposes, in particular to:

- Download material or access sites whose content is contrary to public order, individual privacy and dignity, and public decency (pornography, paedophilia, incitement to racial hatred, terrorism, revisionism, etc.);
- Post public insults or abusive comments, share images of colleagues without their consent, or reproduce logos and registered trademarks without the required legal permissions.



For more info, see:

- Standard for the Security policy of Group IT systems (RG00029).
- “Making social, racial and gender diversity a day-to-day reality” awareness-raising kit.

PRACTICAL EXAMPLES

Reselling materials

“



A middle manager at one of our sites has to have a certain length of disused service tracks removed by a specialised subcontractor, which was awarded the contract for these works. The boss of this firm offers to remove more of the disused track than planned and do a 50/50 split with him of the proceeds from reselling the old materials (railways, sleepers, scrap metals) salvaged from these unused tracks not provided for in the contract. SNCF would not pay any more than agreed for these works and would cover the costs of the materials removed as per the internal regulatory processes, but only for the tracks provided for in the contract and not for all tracks actually removed.

”

Should he accept this offer?

No, because any tracks removed over and above the length provided for in the contract is the public property of SNCF Réseau. The SNCF middle manager or the subcontractor does not have the right to appropriate the proceeds from reselling these old materials for their own benefit.

This would constitute a theft of SNCF property perpetrated by both the middle manager and the subcontractor.

Sponsorship

“



I am the chairman of a non-profit environmental protection association. I also hold a position in the SNCF Group, and have been delegated the powers to make donations to non-profit organisations, which tend to be moderate amounts. So, I intend to make a donation to the association that I chair, telling myself that there is nothing unlawful about this since I would not be violating the powers delegated to me, and do not stand to make any personal gain as it would be contributing to the legitimate purposes of the association.

”

Can I do this?

No, the amounts that you can donate to associations are subject to very strict rules, and the associations you choose cannot be dictated by any sort personal interest, even if this interest is non-financial. By choosing the association that you chair, you would immediately exclude other associations that could have legitimately claimed this donation on the grounds of their commitment to protecting the environment. So, this action would be contrary to the sound and strict management of SNCF Group funds, regardless of any conflict of interest.

08

REDUCING OUR ENVIRONMENTAL FOOTPRINT

Conscious of its responsibility towards current and future generations, the SNCF Group has set itself ambitious goals in terms of sustainable mobility and reducing its environmental impact.

Each employee must assume their part of this responsibility based on their role in the Group.



We must...

Strictly adhere to the laws and rules of the SNCF Group on protecting the environment.

Assess and control the environmental impacts of our professional activities: facilities, materials and products, working methods, office environments, business travel, waste management.

Adopt methods and practices that minimise these impacts.

Play our part in protecting biodiversity and managing resources sustainably through individual actions.



We must not...

Disregard investments or the procedures or checks needed to protect the environment.

Deliberately conceal or suppress information related to pollution caused by the Group.

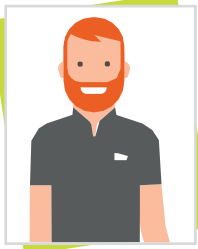


For more info, see:

- SNCF Group CSR report.

PRACTICAL EXAMPLE

“



I am a site manager and am notified at the last minute that my boss will be paying me a visit. I want everything to be shipshape for the visit, and need to get rid of some old computers that have been lying around the property.

I didn't have time to call support services to come and collect them, so ask the team to deal with them however they can, even if this means just leaving them on the station concourse.

”

Should I have done this?

No. Waste management is regulated because electrical and electronic equipment often contains components that are harmful to the environment (batteries and accumulators, greenhouse gases, cathode-ray tubes, components containing mercury, capacitors that may have PCBs, etc.). Moreover, the materials they are made from (ferrous and non-ferrous metals, rare metals, glass, plastics, etc.) have a high potential for recycling.

In France, the system for disposing of electrical and electronic equipment waste is regulated by the Environmental Code, which the SNCF Group must comply with. No urgent matter can justify contravening the law, so I must follow the waste management procedures issued by the company.

09

BEING A SOCIALLY RESPONSIBLE CORPORATE CITIZEN

The civic actions undertaken by the SNCF Group are in line with its overall commitment to promote and continuously improve the Group's actions in terms of social and societal responsibility.



We must...

Ensure the transparency of our accounts and settle all taxes, duties and contributions that are incumbent on us.

Respect local cultures, implement policies and actions that embody openness to the regions, the diversity of our fellow citizens, and consideration for vulnerable sectors of society.

Use our influence in a socially responsible, accountable and transparent way:

- Comply with the codes of conduct and regulations of the political and professional bodies that we engage with.
- Base our positions and stances towards politicians or institutional players on information that has been thoroughly vetted, fact-checked and approved for use by the relevant Group departments.



We must not...

Use our influence unduly by engaging in corruption, influence peddling or other dishonest or improper practices.

Engage in actions in our workplace involving political activities that are not related to our professional duties.



For more info, see:

- SNCF Public affairs charter.

PRACTICAL EXAMPLE



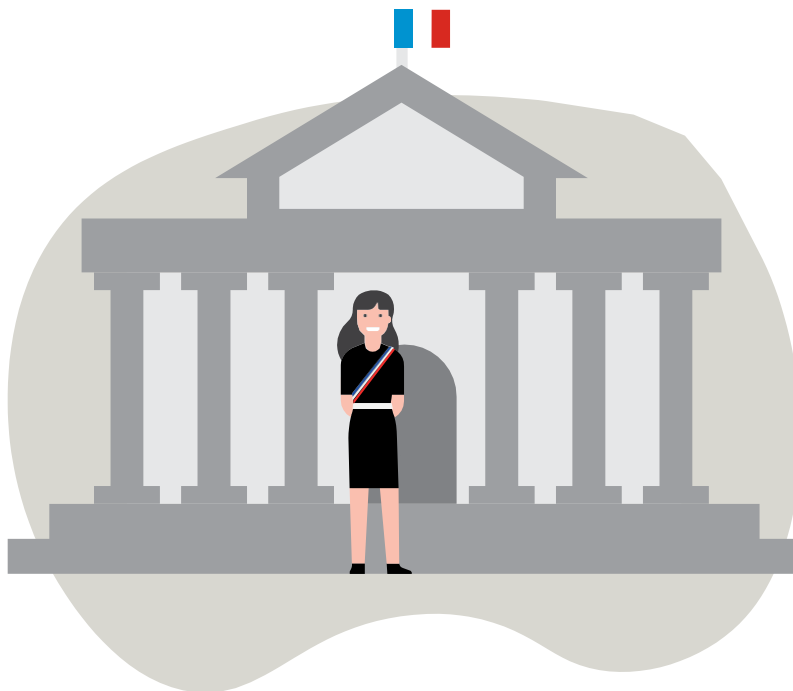
“

I am an employee of the SNCF Group, but also a municipal councillor in charge of urban planning. A plan to develop a freight depot is submitted to the council, which would involve selling land owned by the municipality to the SNCF Group. However, a rival offer to purchase this land is also submitted to the council by a car dealer. After careful consideration, I conclude that my duties as a councillor should not interfere with my professional commitments, so decide that I should not participate in part of the council meeting dealing with this matter.

”

Was this the right thing to do?

Yes, in this case there is clearly a potential **conflict** of interest between my duties as a councillor and my status as an employee of the SNCF Group. This conflict of interest could raise suspicions of an illegal acquisition of interests subject to sanctions and, in the event of a dispute, would call into question the council's decision if it were to sell the land to the SNCF Group. This would be detrimental to the **Group**.



1

ENSURING OUR SERVICE PROVIDERS, SUPPLIERS AND PARTNERS ENFORCE EQUIVALENT ETHICAL STANDARDS

The SNCF Group engages with many different stakeholders on a regular basis: service providers, suppliers, partners and intermediaries.

As a responsible Group, we have a duty to ensure that the ethical standards enforced by these stakeholders are equivalent to our own.



We must...

Ensure that our service providers, suppliers, partners, and in general all our stakeholders are familiar with our Ethics Charter, and ask them to make a contractual commitment to comply with this Charter, and ensure that their own suppliers or subcontractors also comply with it.

Require our suppliers, service providers or partners to prohibit any act of corruption or influence peddling, by demanding that they make specific contractual commitments on these points, especially in relation to being audited.

Require our suppliers, service providers or partners to commit to respecting the fundamental principles that prohibit harassment, discrimination, child labour and forced labour, in accordance with the conventions of the International Labour Organisation.



We must not...

Enter into contracts with suppliers or service providers who do not comply with labour laws or our ethical principles, especially in the areas of human rights and fundamental freedoms, combating corruption, free competition and environmental protection.

Enter into contracts with people or companies who employ practices such as the deprivation of liberty, forced or compulsory labour or working conditions likely to seriously harm the physical or mental well-being of the people they employ.

Enter into contracts with people or companies who employ illegal immigrants or children deemed underage according to the international conventions on child labour and the legislation of the country in which they are employed.

If an entity that the SNCF Group already has a contractual relationship with commits one of the above-mentioned violations, this entity must submit an action plan to the Group detailing how it plans to remedy this violation, and the Group will then assess whether or not to terminate the contract based on this plan.

PRACTICAL EXAMPLE

“

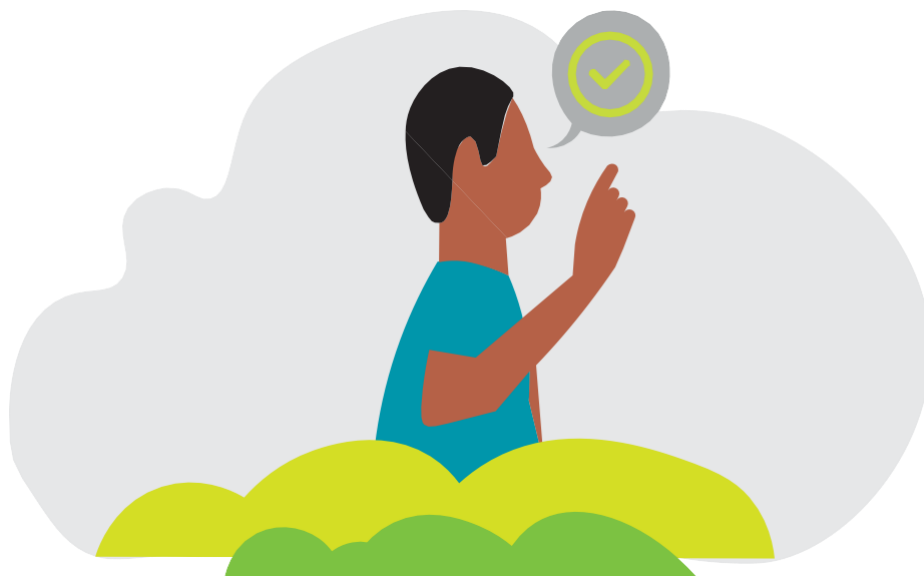


I receive unverified information that one of my suppliers has been working with a foreign subcontractor, which I was previously unaware of. Apparently this company employs children under the age of 15, which contravenes the child labour rules of the International Labour Organisation. Even though I am perfectly happy with the quality of products from this supplier, I also feel I cannot ignore this info and should conduct an audit.

”

Is this the right reaction?

Yes, this sort of information simply cannot be ignored. You must ask the supplier to explain the situation, and if you are still not convinced, initiate an audit by referring to the clause of the supplier's contract that specifically allows for such audits to be conducted. If the audit reveals these practices, this will constitute a serious contractual breach of market rules by the supplier, and the relationship with this supplier should then be terminated.



1

ASSUMING THE SPECIFIC DUTIES OF PUBLIC SERVICES

IMPORTANT: THIS ELEVENTH PRINCIPLE APPLIES MORE SPECIFICALLY TO THE 5 SNCF RAILWAY COMPANIES AND THEIR SUBSIDIARIES WITH PUBLIC SERVICE DUTIES.

The activities of SNCF Group subsidiaries providing public services require our utmost vigilance to observe our duties towards the State and the principles of public service: secularism and neutrality, equal access to public services, specific duties of good faith and discretion.

The principle of equal treatment and the duties of good faith and discretion apply to all SNCF Group employees without exception, and those who belong to the SNCF Group and provide a public service have more stringent obligations in these areas.



Secularism and neutrality

The principles of secularism and neutrality are binding on the State and also apply to employees of SNCF Group companies who provide a public service mission, whether or not they are in contact with the public.



We must...

Respect and ensure respect for secularism and neutrality within SNCF companies and their subsidiaries providing public services.

Uphold stringent standards of discretion when expressing our political or religious convictions.

Always give more priority to the needs of a properly functioning public service — above all continuity and equality, than to customer requests related to their religious practices and customs.



We must not...

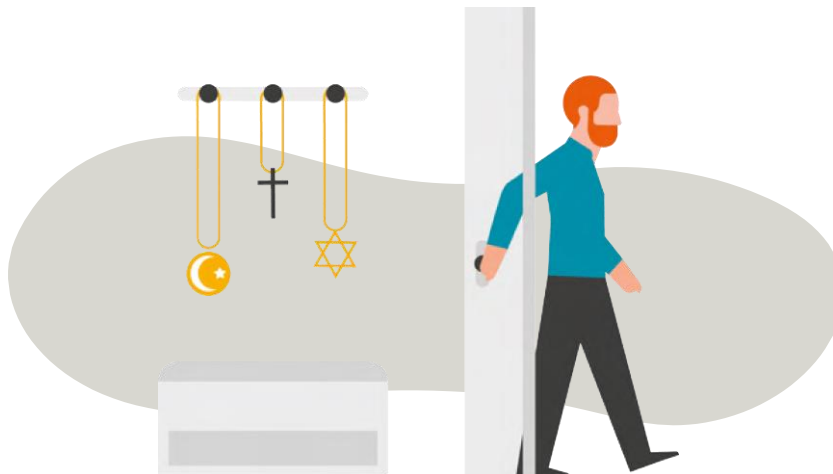
Allow confusion to arise between our own private beliefs or commitments (associative, political, religious, etc.) and the positions of the SNCF Group.

Practice or tolerate in the company proselytism or behaviour ostensibly based on political or religious beliefs.



For more info, see:

- Practical guide: “Principles of secularism and neutrality within the SNCF Group”.



Equal treatment

Equal treatment is a fundamental principle of public service.



We must...

Always ensure equal treatment in comparable situations to facilitate access to:

- Our services for our customers;
Our markets for our suppliers and service providers;
- The national rail network and its service infrastructure for all users.



We must not...

Engage in discriminatory conduct towards certain customers or unduly deprive them of access to our services based on their real or perceived differences.



Specific duties of good faith and discretion

The provision of public services requires strict standards to be upheld to ensure proper conduct towards customers and the general public.



We must...

Engage in exemplary conduct when listening to and serving our customers.

Selflessly provide assistance to our customers when the need arises.

Provide them with any information they may need.

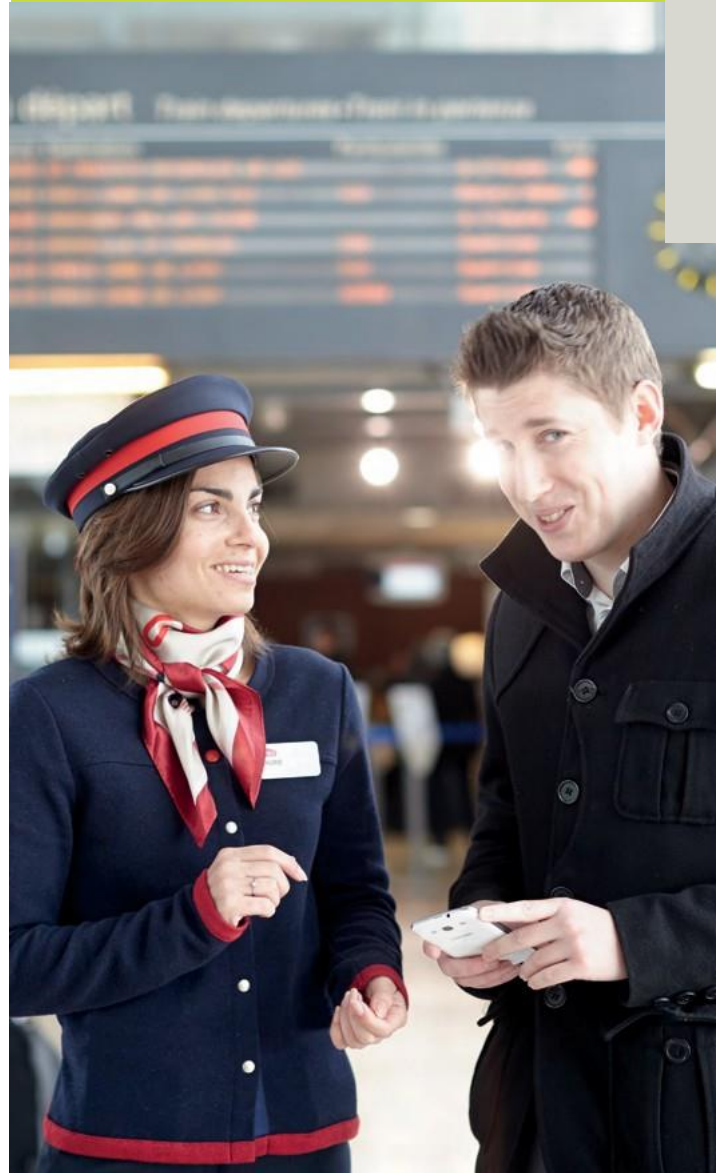
Ensure conduct in stations and on trains that does not offend other passengers and does not fuel disputes with colleagues — especially with inspectors.



We must not...

Make public remarks that violate the dignity of customers, and especially passengers.

Discuss business matters, mention the names of customers or suppliers or speak of in-house business practices in public places, and in particular in stations and on trains, without due regard for confidentiality or discretion.



AGENTS OF ETHICAL PRACTICE

All SNCF Group employees must integrate the values and principles set out in the SNCF Group Ethics Charter into their day-to-day professional practices.

There is, however, one key agent: the manager, who provides guidance and advice on ethical issues, together with other dedicated agents.

THE MANAGER: A KEY AGENT

A **MANAGER** is responsible for leading a team, regardless of size, setting its targets, and giving it a sense of purpose and direction. The manager must communicate a specific vision to team members and serve as a guide for each of them. From senior executives to those in charge of local operations, managers are the number one ambassadors of our values. They must ensure that our principles of ethical conduct are properly adhered to.

Accordingly, managers have a duty to:

- Be familiar with the Ethics Charter and set the example of responsible conduct through their actions and behaviour, both internally and externally;
- Ensure that their employees are also familiar with the Ethics Charter, and explain its content to them if necessary, as well as to any new employees in the entity or team;
- Be available and attentive to employees who report ethical concerns, and relay these concerns to the dedicated agents if they themselves do not have the means to provide solutions;
- Ensure that any person that they intend assigning a position of responsibility to is familiar with the Ethics Charter and has the competence, authority and means to in turn ensure that it is properly adhered to.



DEDICATED AGENTS

GROUP ETHICS COMMITTEE

The Group Ethics Committee is tasked with proposing any recommendations concerning the Group's ethics policy to the Senior Management Team of the SNCF Group. It creates material to supplement the Ethics Charter through the adoption of guides or action plans on specific ethical subjects.



GROUP ETHICS DEPARTMENT

The Group Ethics Department is an operational entity dedicated to ethics within the SNCF Group: its role is to bring ethics to life and it conducts all training, awareness and educational actions required to promote the principles contained in the Ethics Charter and ensure their adoption. It uses the "Ethics Helpline" to provide support and effective advice to any manager or employee confronted with an ethical issue. It uses the "Whistleblowing" system to manage any ethical issues reported by conducting the necessary investigations or having them conducted.



For more info, see:

- Standard on the Organisation and Remit of the Group Ethics Department (RA-00088).

ETHICS COMPLIANCE OFFICERS

The Group Ethics Department coordinates

a network of ethics compliance officers in each of the SNCF Group's major businesses and in the main subsidiaries.

Ethics compliance officers are responsible for ensuring that the Ethics Charter is adopted within the scope of their entity. Both facilitators and organisers, they contribute to preventing ethical risks by promoting professional practices pursuant to the values and principles of ethical conduct specified in the Ethics Charter and, if necessary, by ensuring the adoption of specific guides or codes for the activities or businesses of their entity.



USEFUL LINKS

All documents included in the Charter under the heading “For more info, see:” are available on the SNCF Intranet site “ETHIQUE”, and via the MyEtic app available on SNCF business smartphones.

These documents can also be requested directly from the Group Ethics Department.

CONTACT THE “ETHICS HELPLINE” FOR SUPPORT AND ADVICE:



04 27 01 02 81



The MyEtic app



ligneethique@sncf.fr



SNCF

Direction de l'Éthique Groupe

2 Place aux Étoiles

CS 70001

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ACCESS THE “WHISTLEBLOWING” SYSTEM VIA:



The MyEtic app



www.alerteethiquesncf.co



SNCF

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This Charter has been signed by the Chairman and CEO of SNCF SA:

Jean-Pierre FARANDOU
Chairman and CEO

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