

Code of Conduct

Fayat Group



Editorial



The Fayat Group came into being more than 60 years ago and has been shaped by its three founding values: autonomy, commitment and audacity.

Autonomy is one of our organisation's key values and has enabled the Fayat Group to develop and strengthen its expertise over the years. This principle demonstrates the trust we place in the managers of our subsidiaries, who in return undertake to uphold their own integrity and that of their employees.

Commitment is a requirement for all Fayat Group employees. This means honouring obligations while complying with laws and ethics.

Lastly, audacity drives the Fayat Group's entrepreneurial and innovative spirit. Our success inevitably depends on creating a relationship of trust with our partners, clients, suppliers and subcontractors. The fight against corruption helps to create this trust, because business can only survive if it is conducted ethically.

The French Sapin 2 Law has strengthened requirements in terms of preventing, detecting and remediating corruption and has been part of the Fayat Group's approach to integrity since it came into force. The Fayat Group is strengthening this approach by introducing several measures in response to the regulations, in particular developing a corruption risk map and carrying out assessments of our partners. Today, we are introducing this Code of Conduct at Group level, along with a system for reporting corruption and an e-learning course coming soon to support this.

As shareholders of the Fayat Group, ethics, and in particular the fight against corruption, are of the utmost importance to us. We therefore ask that all Fayat Group employees read this Code of Conduct and apply it strictly and pragmatically by acting ethically and responsibly in their daily work.



CEO

Jean-Claude Fayat

Managing Director

Laurent Fayat



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Introduction

Ever since its inception, the Fayat Group has always operated in accordance with ethical values and, more generally, in full compliance with regulations.

The major founding principles of the Fayat Group and its subsidiaries – **autonomy**, **commitment** and **audacity** – have always been fostered and nurtured within the framework of integrity, fairness, and more generally, **honesty**.

The French Sapin 2 Law of 9 December 2016 on transparency and the fight against corruption extended the legal framework concerning corruption and various associated illicit behaviours.

The purpose of this Code of Conduct is to formalise the rules in force within our Group and to define the permitted and prohibited behaviours that Group employees and managers need to keep in mind in their daily decision-making processes.

It is the responsibility of each divisional and subsidiary manager to apply and implement this Code among all employees and to ensure that they and their employees comply with it scrupulously and rigorously.

Each Fayat Group subsidiary must incorporate this Code of Conduct into its internal rules and regulations. **All employees**, including external and occasional employees, must also have access to this Code, by all appropriate means, and in particular by:

- ✔ Providing, wherever possible, all new employees with a copy of the Code of Conduct
- ✔ Publishing it on the employing company's websites
- ✔ Posting a copy on the company's notice boards provided for this purpose.



For subsidiaries that are not required to have internal rules and regulations, this Code must be provided to employees in a way that proves it has been distributed or made available to them.

For subsidiaries abroad, this Code must be implemented in accordance with the constraints and specific requirements of local legislation.

Subsidiaries and divisions may implement their own codes and charters as long as they do not contravene this Code.

This Code is not designed to cover all situations that may arise, nor is it a substitute for the above-mentioned law. However, by implementing the recommendations of this Code, in addition to those of existing programmes initiated by Group subsidiaries and divisions, each Group employee will be aware of his/her obligations under the regulations in force and in particular those relating to corruption.



Chapter 1: Corruption risks in the Fayat Group



The Sapin 2 Law of 9 December 2016 reiterates the illegal behaviours in force in the French Criminal Code and gives powers to the French Anti-Corruption Agency to control them, particularly within companies.

These illegal behaviours are mainly bribery, influence peddling, extortion by public officials, illegal taking of interest, misappropriation of public funds and favouritism.

This Code explains each of the above illegal behaviours and then considers and illustrates them in the context of our Group's activities.

1. Bribery



Bribery consists of **promising, offering or soliciting** a third party or **receiving** from a third party, directly or indirectly, **an unfair advantage** of any kind, whether monetary or otherwise, such that the third party, in breach of his/her obligations, **acts or refrains from acting** in a way that is within the scope of, or facilitated by, his/her position or activity.

- Bribery can be active, i.e. offering an unfair advantage to a person to obtain an action in his/her favour, or a possible abstention that would benefit the perpetrator.
- Bribery can be passive, i.e. receiving an unfair advantage from a person for the purpose of doing or refraining from doing something, in favour of the person who offered the unfair advantage.

These definitions are based on French law, but most countries have similar regulations.

Bribery, whether active or passive, is an offence severely punished by the French Criminal Code.



Bribery is **strictly forbidden** within the Fayat Group. Furthermore, bribery exposes Fayat Group subsidiaries (legal entities) and its employees (natural persons) to significant risks of **criminal sanctions**, including:

- For legal entities: Very substantial fines, temporary or permanent disqualification from running a business, temporary or permanent exclusion from public contracts, and damage to the reputation of the subsidiary and its parent group.
- For natural persons: Imprisonment, substantial fines and loss of employment.



Bribery risks

The activities of the Fayat Group focus mainly on the construction and industrial sectors. All of the Fayat Group's businesses – and therefore all its employees – may be exposed on a daily basis to:

- Public- and private-sector contracts
- Subcontracting contracts
- Service contracts.

Bribery risks may arise in various ways, given the systematic competitive bidding process.

In this specific context, **attempting to win a contract, create a privileged situation** with the client(s), or **secure decisions in favour of the company** for a works contract can lead to **illegal behaviour**.

Unfair advantage

Bribery, which involves obtaining an unfair advantage, may take the form of:

- A **payment of money** outside the scope of a contract
- **Payments relating to a client's personal expenses**, such as work on their home
- **Gifts** that are intended as a reward or consideration for a service provided
- **Invitations** to expensive trips, shows and sports events
- **Payments of money** as part of sponsorship activities.

These examples are of course not exhaustive.

Beneficiaries of unfair advantage

The beneficiaries of such unfair advantage may be:

- Clients
- Representatives of these clients (in particular intermediaries), either directly or indirectly
- Legal structures created for the sole purpose of receiving such unfair advantage.



Should employees of the Fayat Group, whether during a tender or more generally during any commercial negotiation, be confronted with particular requests that are not part of the normal business processes, they must **inform their line managers**.

No deviation from ethical principles will be accepted, as integrity remains the highest priority. Each employee has an increased **due diligence obligation** regarding bribery or attempted bribery.



Service providers, subcontractors and suppliers

The same rules apply to business relationships with service providers, subcontractors and suppliers.

The use of such contractors, whether for goods or services, must be in line with the company's needs, and orders placed must provide legitimate and justified consideration.

The services and goods ordered must be at a market price to void the possibility of undue commission.



The use of a service provider, subcontractor or supplier must be subject to a number of checks, including whether the third party is on an international sanctions list, whether the level of risk in the country in which the third party is based is acceptable, and whether there are any politically exposed persons in its management team or shareholder base.

For our construction and industrial activities, in addition to the legal obligations, these checks, particularly concerning **integrity**, will be carried out using a computer-based tool, bought from a specialist company and available to all Group subsidiaries.

A Group procedure has been developed, in collaboration with a specialist service provider, concerning the assessment of third parties. This procedure has been made available to all Group subsidiaries and its use is mandatory.

Each subsidiary therefore has access to this tool, and Group employees must comply with the instructions provided by their line managers, who are responsible for authorising any commercial relationship with the said third party based on the result of the assessment.

Lastly, this Code will be available to third parties from the Fayat Group's website.



Fayat Group subsidiaries must refer to this Code of Conduct in an ethics clause in their contracts with third parties.



2. Influence peddling



Under French law, influence peddling is treated similarly to bribery, which is described above. Influence peddling is defined as **receiving or soliciting donations** with the aim of **abusing one's influence, real or supposed**, over a third party, **so that the third party makes a decision in their favour**.

Unlike bribery, which involves only two parties, influence peddling involves **three parties**:

- The beneficiary (who provides an advantage)
- An intermediary (who uses the advantage he/she has because of his/her position)
- The target person (who holds the decision-making power).



As with bribery, influence peddling is prohibited within the Fayat Group, and this offence also leads to significant criminal sanctions.

3. Extortion by public officials



Extortion involves a public authority official or a person in charge of a public service task receiving, demanding or ordering the payment of an undue sum.



Even though legal entities and natural persons within the Fayat Group are not public authorities, it is important to be particularly **vigilant** and never succumb to any request from any person holding public authority or risk becoming an accomplice to such an offence, which is also severely punished by the criminal courts.



4. Conflict of interest



A conflict of interest exists when, in the course of his/her work, an employee's **personal interests** directly or indirectly **conflict or compete** with the interests of Fayat Group subsidiaries and may therefore influence the position or decision that he/she ultimately takes or does not take and may cast doubt on his/her loyalty.

By personal interests, we mean not only those of the employee, but also those of any natural person or legal entity with which he/she may be directly or indirectly linked.

Conflicts of interest are not in themselves punishable under the French Criminal Code, but they can lead to criminal offences (bribery, favouritism, etc.).



For example, Group employees may not **invest in the business of a client or a supplier/service provider/subcontractor**, nor **hold any interest** in the legal structures of these parties if this investment or interest is likely to influence their behaviour when carrying out their work.



Similarly, employees may not **work** in any capacity for these **clients/suppliers/service providers/subcontractors**, nor receive any unfair advantage from them.

Any conflict of interest would be in breach of the **duty of loyalty** in the employment relationship and could, in certain circumstances, lead to bribery, favouritism, illegal taking of interest or extortion.


Of course, conflict of interest does not concern employees' activities related to charitable, sponsorship, civic, religious, educational, political or social organisations carried out in the private sphere, as these activities are unlikely to influence their behaviour when carrying out their work.



In the event of an actual or potential conflict of interest, the employee must be transparent about the situation and **inform his/her line manager and/or the Human Resources Department and/or the Legal Department**. Notification in writing is preferred.



5. Illegal taking of interest

 Illegal taking of interest involves an elected representative **using his/her position** in a public authority to gain **personal advantage**.



This offence therefore mainly relates to elected representatives. Nevertheless, here again, employees of Group subsidiaries must be particularly **vigilant** in their relations with elected representatives or risk being considered as accomplices, particularly if it appears that they are involved in the offence, for example by making an undue donation.

6. Favouritism


 The offence of favouritism relates to **infringement of the freedom of access and equality of candidates** in public procurement and public service delegations.

This offence therefore involves persons holding public authority or persons in charge of a public service task who have given or attempted to give an unjustified advantage to others.



Here again, employees of Fayat Group subsidiaries must remain **vigilant** in their dealings with the above-mentioned persons, particularly if the unjustified advantage is for the benefit of a Fayat Group subsidiary.

7. Misappropriation of public funds

 The offence of misappropriation of public funds relates to a situation where a person who holds public authority or is in charge of a public service task **misappropriates public funds that have been entrusted to him/her** because of his/her duties or task.



Chapter 2: Advice and recommendations

As mentioned above, illegal behaviour, as defined in Chapter 1 of this Code, may occur during the course of the Group's business activities. To prevent any possible act of corruption, Fayat Group employees must be particularly attentive to the following matters.

1. Business gifts and invitations

Business gifts may only be offered or accepted by Group employees if:

- ✓ The value of the gift remains **symbolic** or of **low value** when considering what is at stake in a potential business relationship.
- ✓ The sole purpose of a business gift, whether given or received, is to be **polite** and show **appreciation**.

Invitations to a restaurant, a show, a sports event or a trip may only be offered or received if:

- ✓ They are made in the context of a professional working relationship and are **exclusively professional in nature**
- ✓ The Group **employee** is **present**
- ✓ They are of a **reasonable value**.

For example, invitations to promote the company's products, expertise or services are allowed, as are invitations to trade fairs and conferences, and as part of philanthropic or sponsorship activities.

- ✗ Under no circumstances may a business gift or invitation be given or received if it is intended as a **reward**, or as **consideration for a service provided**, which could conceal an act of corruption.





If an employee is offered an inappropriate gift or invitation from a third party, he/she shall refuse the gift or invitation and inform the other party that accepting it would be against the Group's code of ethics.


If an employee wishes to offer a gift or invitation to a third party, he/she may seek advice from his/her line manager if in any doubt.




2. Facilitation payments

 Facilitation payments are **unofficial payments** without legal basis made to a public official (a civil servant or a person performing public service tasks) to facilitate, obtain or expedite the provision of a service, an administrative authorisation, a permit, a licence or access that is dependent on a normal legal process.

 Facilitation payments are **prohibited** within the Fayat Group. These practices may constitute acts of bribery, extortion or misappropriation of public funds in relation to public officials.

 The Group's integrity and ethical practices mean that it must systematically refuse such payments, and Group employees must follow the administrative procedures in force. If a public official requests a facilitation payment, the employee must refer the matter to his/her line manager so that immediate action can be taken.

3. Political contributions, philanthropy, donations and sponsorship


 Political or trade union contributions, philanthropy, donations or sponsorship are not necessarily prohibited by law.

Political or trade union contributions refer to payments made to political parties, to a candidate in an election or an elected representative, or to trade unions.

Philanthropy refers to payments made to non-profit organisations carrying out activities of general interest.

Donations refer to payments made to non-profit organisations.

Sponsorship refers to payments or material donations made to a sports, cultural or artistic association, in particular with a view to increasing the company's visibility (for example, placing the company name or logo on a sports team's shirts).

 In some cases, these practices may be seen as constituting a consideration, regarded as unlawful, because they involve an unfair advantage. This is why **only the CEOs and Managing Directors** of the Group's subsidiaries are authorised to approve these transactions, to ensure that they are legitimate and do not constitute consideration for a service provided or an unfair advantage.



Chapter 3: Alert procedure



The **procedure for collecting reports and handling alerts** is set out in Appendix 1 of this Code. This system is used to collect reports of behaviour or situations that contravene the Code of Conduct or are likely to constitute breaches of professional integrity.

Conclusion

This Code must be applied by each Fayat Group subsidiary, under the supervision of the General Management of each Company.

This Code may be amended to take account of changes in regulations, updates to the risk map and the implementation of this Code.

Subsidiary employees must comply strictly with the rules of this Code, observing both a duty of vigilance and a duty of transparency, and informing their line managers or ethics contact person of any possible risk.

Any violation of this Code may result in disciplinary action, which may lead to dismissal for gross misconduct and to criminal sanctions, as decided by the criminal courts.

Effective date: 04/02/2022



Appendix 1 of the Code of Conduct

Alert Procedure

Fayat Group




1. Alert receivability

Through the alert mechanism, behaviour or situations that go against the code of conduct or may represent an attack on integrity can be reported.

The alert mechanism **only covers corruption, influence peddling**, and more generally, **all breaches described in Chapter 1** of the Code of Conduct.

2. Alert recipient

Any employee who encounters a case of corruption can report it via the secure address specifically for this purpose, indicated in Appendix 1bis, to:

 The **division's ethics officer** (or the subsidiary's, if the employer company is not part of a division). This officer has been chosen for their impartiality and expertise, to ensure the alert is followed up.

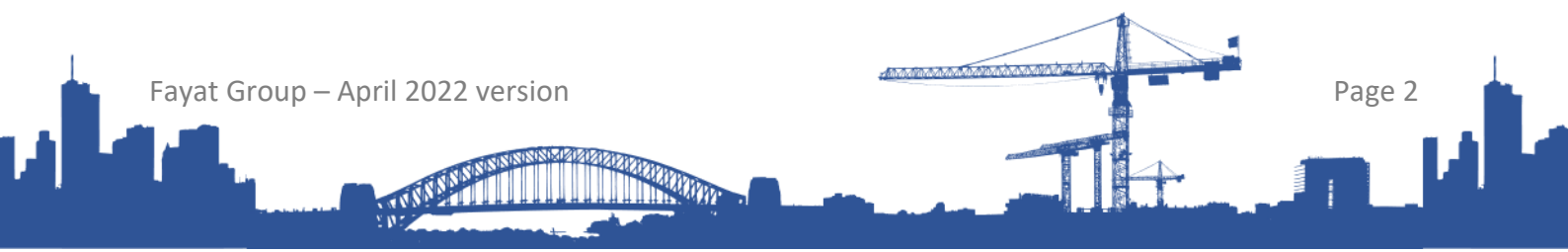
 The **Fayat Group's ethics officer**, if the alert:

- concerns the Employer Company's/Employer Company's Division's ethics officer or;
- concerns a situation that extends beyond the Employer Company or Division.

 Furthermore, while keeping the **alert confidential**, employees can inform:



- their **hierarchical superior**,
- their Company's **representative**,
- the division's or subsidiary's **legal department**.

These individuals will **inform the division's ethics officer**, who will handle the alert in line with this procedure.



3. Means of reporting

All reports must comply with the following procedures:

-  If sending the report to the ethics officer, it must be sent **by post or email** to the address given in Appendix 1bis.
-  If the report is made **by telephone or in a private interview with the alert recipient**, it must be confirmed in writing by the report author, if possible.



To ensure **confidentiality**, all email reports must comply with the following guidelines:

- The letter or email must clearly indicate in the **subject line** that it is reporting an **alert**.
- Alerts addressed to ethics officers are to be sent to the address indicated in Appendix 1bis.
- The report (letter, email, etc.) must provide the report author's contact details, to **allow for dialogue between the report author and the alert recipient**.

4. Commitments to confidentiality


Ethics officers have been chosen for their impartiality and expertise in the area of corruption, to ensure the alert is followed up.


The alert recipient will take all appropriate measures to protect:

- **Information security and confidentiality**, whether when collecting, processing or storing said information
- The **identity** of the **alert author**
- The **identity** of the **person concerned by the alert**

All appropriate precautions will be taken to ensure the security of this data, specifically with access requiring a username and password. Each login is recorded and checks are performed to ensure said logins are appropriate. Alerts received by post and all paper documents are also secured.

Ethics officers and anybody who may be responsible for performing the internal inquiry are subject to a **strengthened confidentiality agreement under contract**.

 Elements likely to **identify the report author directly or indirectly** can only be divulged with the author's consent, except in the event of a request from legal authorities. In the event that these elements are provided to legal authorities, the report author will be informed, unless such information risks compromising the legal inquiries or procedures concerned. The legal authorities will ensure that the report author's identity is protected for the duration of the inquiries triggered by the alert.

 Elements that may **identify the person accused** by the report can only be divulged once the alert has been established to be founded, except in the event of a request from legal authorities.

To guarantee these commitments, the process will be the following:

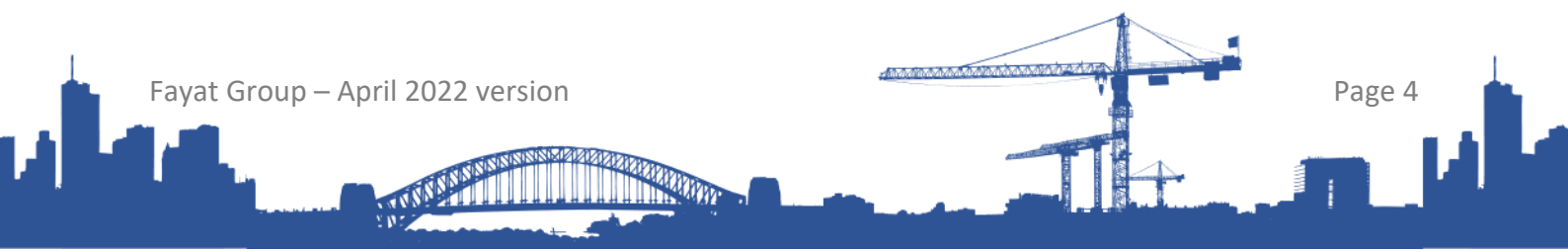
- Alerts sent by email to the ethics officer at the address given in Appendix 1bis can only be accessed by the officer. They will be informed that a report has been sent by email via a message to their professional email inbox.
- Confirmation of receipt of the report is sent via registered letter with confirmation of receipt or via email sent to the sender of the alert.

5. Protected whistle-blower status

To receive whistle-blower status, the report author must comply with the legal conditions.

No **sanctions or punitive measures** may be taken against employees who have respected these conditions.

On the other hand, use of the mechanism that is abusive or in bad faith will expose the author to disciplinary sanctions, as well as to legal proceedings. In the event of defamatory allegations, the author may be subject to criminal sanctions, as specified in Article 226-10 of France's Penal Code.



6. Alert content



The report author must describe the **events and information** constituting the alert in an **accurate and objective** way.

The alert may relate to:

- actual or suspected infractions,
- that have occurred or are very likely to occur,
- that have taken place at the report author's employer company, or at another organisation with which the author has been in contact as part of their work,
- attempts to conceal infractions.

The wording used to describe the nature of the events reported should explain whether they are **presumed or known to have happened**. Only elements in direct report with the areas specified in Chapter 1 of the Code of Conduct and that are strictly necessary for fact-checking operations will be considered.

Data that does not satisfy this criteria will be destroyed.

If the report author considers it necessary to accuse one or multiple physical people in the report, they must proceed in the following way in order to ensure the identity of the person (or people) remains confidential.

- If sending the report by email, it must only be sent to the address given in Appendix 1bis;
- Under no circumstances may the report author talk about the report (except in the context of processing the alert), and especially the content of said report or the people concerned.


7. Evidence



If the report author has access to **documents or data to support their report**, in any form or format, they must provide them.

Such items may be simply **mentioned** in the alert letter or email and then made **available to the alert recipient** as soon as possible.

All information communicated as part of the alert procedure that does not fall within the scope of the alert will be immediately destroyed by the alert recipient, unless the vital interest of the company in question or the physical or moral integrity of its employees are at stake.

 The report author incurs **no responsibility for obtaining information** for the alert, or **accessing said information**, on the condition that it is necessary and proportional and that it does not represent a criminal infraction in and of itself.

8. Alert processing

 Diagram of the alert process in part 11 of this procedure.

Confirmation of receipt



Once the **report has been received**, the ethics officer will inform the alert author by registered mail with confirmation of receipt or email within **seven (7) days**:

- That the report has been **received**,
- If necessary, of the **remaining elements to be provided** to proceed with processing the alert,
- Of the reasonable, predicted **processing period for the alert**,
- Of the means (post, email) by which the author will be **informed of next steps** taken for their report, specifying that this information should normally be sent before the end of the processing period indicated.

If the alert recipient considers that the **prerequisite conditions for examining the alert are not met**, they will inform the report author as soon as possible.

Checking the alert's receivability

In their initial assessment, the ethics officer will first ensure that the report author has truly acted **within the scope of the procedure** and in line with the conditions for receivability.



If they consider that it is not the case, they will inform the report author immediately. This period cannot be longer than three (3) months from confirmation of receipt of the report, or if confirmation of receipt is not sent to the report author, three (3) months after seven (7) days from when the report is sent.

If they deem it suitable, they may ask the report author to provide **complementary elements**, before proceeding in examining the alert in depth, if appropriate.

From this point, the ethics officer will have to take **protective measures**, to protect the evidence needed for the internal inquiry.




Internal inquiry


As part of processing the alert, the ethics officer may undertake **any investigations** that they believe necessary to verify whether or not the alert is well-founded.


The ethics officer may also mobilise the resources needed to successfully perform the inquiry: human or material resources, internal or external to the company.


However, the mobilisation of these resources must be organised confidentially, for example by limiting it to only involving essential people.


 The **social representative** is at minimum informed when inquiries are opened concerning the most sensitive situations, except for those in which they are accused themselves. If necessary, they may also be involved (if not accused) as part of processing the alert.

 **All employees** whose intervention is needed may be involved.

 The division's ethics officer may also inform and request the opinion of the **Group's ethics officer**.

 If deemed necessary, they may appoint any **external service provider** as part of their investigations, who must respect the strictest requirements in terms of confidentiality.

 Anybody who may be charged with performing the internal enquiry is subject to a strengthened confidentiality agreement under contract.

 If the ethics officer considers that they need a **longer period than predicted**, they must **inform the report author** and specify, if suitable, the reasons for the extra time and indicating the current status of processing the alert.

After the internal inquiry is completed, a **report** will be issued, intended to record all **facts** and **evidence** gathered, whether incriminatory or exculpatory, establishing or eliminating suspicion, as well as the **method** followed.



Next steps for the alert

The internal inquiry report may conclude with recommendations around **next steps** to be taken for any breaches observed, such as **disciplinary sanctions** against people who have committed or participated in events considered illicit or illegal, as well as, if applicable, **referral to legal authorities**.

The report will be communicated to a **committee** to examine the alert and issue an opinion.



At minimum, the committee is made up of:

- The division's ethics officer
- The subsidiary or division's representative
- The Human Resources director



Anybody needed for decision-making can be invited: the group's ethics officer, IT experts, reference people from other Group entities, external specialists, etc.

The **company representative** will have to make a decision about the person or people concerned by the alert, based on the inquiry report and committee's opinion.

The report author will be informed by post or email of next steps taken following the report.

If, after the internal inquiry, **no disciplinary or legal steps** are taken, elements in the report dossier that could identify the author or people accused will be destroyed as soon as possible (no more than two months after fact-checking operations are completed). Means of destruction must include all formats and elements, especially data in digital format.

Lastly, the report **author** and **people accused** by the report will be **informed** that the alert processing operations have been **completed**.



9. Periods of data storage

Data relating to an alert that is considered **not to fall under the scope of the procedure** will be **destroyed** immediately.

If **no next steps** are taken following an alert that does fall within the scope of the procedure, the data relating to this alert will be destroyed within **two (2) months** after fact-checking operations are completed.

When a **disciplinary or litigious procedure** is taken against an accused person or the author of an abusive alert, data relating to said alert may be conserved until the procedure is completed, the **statute of limitations** (six years) expires or **means of appeal are exhausted**.

Data may be conserved longer, in archives, if the company is legally required to (for example, to respond to accounting, social or fiscal obligations).

10. Rights of people accused by an alert

In principle, anybody accused by an alert is **informed** of data concerning them by the alert recipient, as soon as the report is received (whether in digital format or not), within a reasonable period, no longer than a month from when the alert is issued.

As an exception to the above, a person accused by an alert may be informed after evidence is collected, in order to avoid said evidence being destroyed.

The person accused by the alert, the report author, and the presumed victims of the acts may exercise the following rights:

- Right of access, right to rectification
- The right to erasure for data concerning them, except if processing is needed to comply with legal obligations
- The right to restrict processing - for example, if somebody challenges the accuracy of the data, they can request that the company temporarily freezes the processing of their data while proceeding with the necessary fact-checking.

These rights can be exercised by contacting the alert recipient.

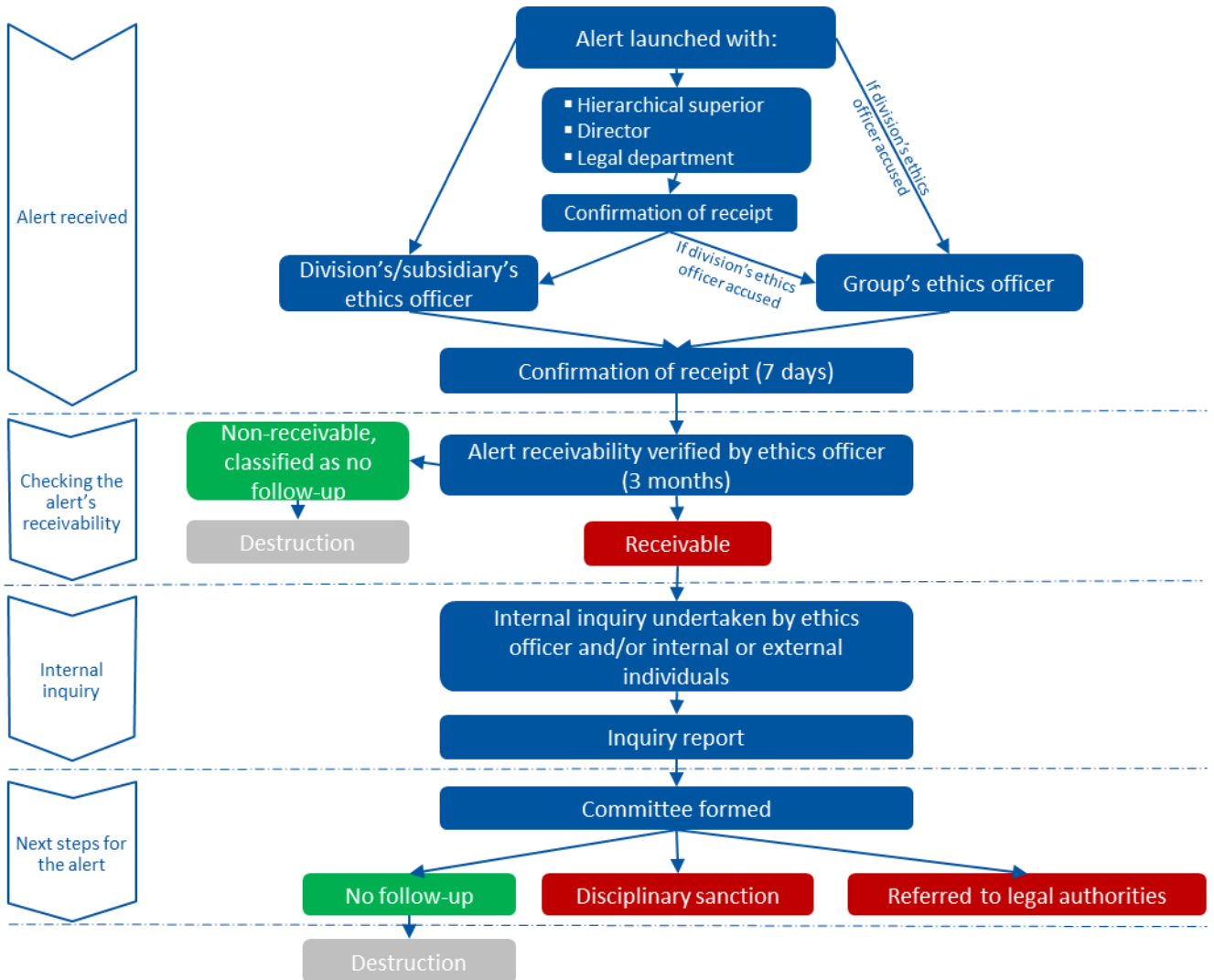
The following information will be supplied to any person accused by an alert, upon their request:

- A copy of these rules, regulating the Group's alert procedure,
- A copy of the legal dispositions relating to the alert procedure,
- The acts they are accused of,
- The list of alert recipients
- The means of exercising their rights to access, rectification, erasure and restrict processing.

The person accused by the alert can **under no circumstance be informed of the identity of the person who sent the alert**.



11. Alert process diagram



Appendix 1bis of the Code of Conduct

Your ethics officers

Fayat Group

Fayat SAS and affiliated subsidiaries, Fayat IT, FCAI, Vineyards



Norberto IZQUIERDO



Fayat SAS

137 rue du palais Gallien

BP 90028

33029 Bordeaux Cedex

FRANCE



Referent.ethique@fayat.com

Fayat Bâtiment



Patricia PACINOTTI



Fayat Bâtiment SAS

Immeuble Space B

208/212 bd du Mercantour

CS 61011

06204 Nice cedex 3

FRANCE



Lanceur.alerte@fayatbatiment.fayat.com



Fayat Chaudronnerie



Fabrice DUGUET



Referent.ethique@chaudronnerie.fayat.com



Charlatte Réservoirs

17 rue Paul Bert

89400 Migennes

FRANCE

Fayat Road Equipment (French scope)



Christian BARBELANNE



Referent.ethique.materiel-routier@fayat.com



Fayat SAS

137 rue du palais Gallien

BP 90028

33029 Bordeaux Cedex

FRANCE

Fayat Energie & Services



Phanlem CHHEA



Ethique.line@fes.fayat.com



Fayat Energie et Services

2 avenue du Général-de-Gaulle

TSA 32752

91175 Viry-Chatillon Cedex

FRANCE

Fayat Fondations



Isabelle GUETRE



Referent.ethique@franki.fayat.com

Referent.ethique@sefi-infrafor.fayat.com



Sefi-Infrafor

9/11 rue Gustave Eiffel 91350

Grigny

FRANCE



Fayat Métal



Cyril EULOGIO



Referent.ethique@fayatmetal.fayat.com



Fayat Métal SAS

137 rue du palais Gallien

BP 90028

33029 Bordeaux Cedex

FRANCE

Razel-Bec, Fayat Entreprise TP and affiliated subsidiaries



Christophe DUMONT



Referent.ethique@razel-bec.fayat.com

Referent.ethique@fayattp.fayat.com



Razel-Bec

3, rue René Razel

Christ de Saclay

91892 Orsay Cedex

FRANCE

Urbaine de Travaux and affiliated subsidiaries



Delphine BRIAND



Referent.ethique@urbaine.fayat.com



Urbaine de Travaux

2 avenue du Général de Gaulle

91170 Viry-Chatillon

FRANCE

