



# Supplier Code of Conduct

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ALBIOMA  
SIMPLIFIED JOINT-STOCK COMPANY WITH SHARE CAPITAL OF  
€1,248,178.70  
TOUR OPUS 12  
77 ESPLANADE DU GENERAL DE GAULLE  
92081 PARIS LA DÉFENSE, FRANCE  
NANTERRE TRADE AND COMPANIES REGISTER NO. 775 667 538



**ALBIOMA**

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## 1. *Introduction*

This Supplier Code of Conduct is the tangible expression of Albioma's commitment to strengthening its Responsible Purchasing practices.

The Supplier Code of Conduct complements Albioma's Ethics Charter, which describes the Group's core values to be shared by employees and corporate officers in all the companies it controls, as well as by all the Group's external service providers. Because we know that our partners play a key role in our success, we would like to share with you our commitments as a responsible principal, and involve you in our continuous progress towards sustainable development.

This Supplier Code of Conduct is the common foundation that defines the rules that are essential to responsible and exemplary collaboration. It must guide the actions and decisions of everyone involved to make these ethical, employee-related and environmental commitments a reality.

We rely on our teams to comply with the Supplier Code of Conduct and apply it on a daily basis with our suppliers.

## 2. *Objectives*

Albioma's Supplier Code of Conduct defines the rules for a healthy and balanced commercial relationship between Albioma and its suppliers, based on mutual responsible commitments.

It takes inspiration from internationally recognised principles, in particular the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the fundamental conventions of the ILO.

## 3. *Scope of application*

The Supplier Code of Conduct applies to any supplier, subcontractor and service provider (hereinafter "the supplier") that enters into a commercial relationship with Albioma.

The acceptance of an order or the entering into of a contract implies the supplier's full acceptance of the provisions of this Supplier Code of Conduct. Compliance with the provisions of the Supplier Code of Conduct is part of the Group's General Purchasing Terms and Conditions. This applies to new contracts to be entered into as well as to contracts being performed at the time of renewal.

Moreover, the supplier commits to require its own suppliers and subcontractors to comply with the same commitments.

## 4. *Albioma's commitments to suppliers*

Albioma is committed to creating and maintaining respectful and lasting relationships with its suppliers. Albioma therefore commits to:

- Comply with the law and regulations applicable to the Group's activities in all the countries in which it operates;
- Carry out its purchasing impartially in order to stimulate healthy competition between its suppliers, with complete fairness. In this way, Albioma guarantees equal treatment of suppliers, without any form of discrimination during the purchasing process;
- Comply with legal payment deadlines;
- Favour out-of-court resolution in the event of disagreement, with the intervention of a third party, in accordance with local regulations, before taking legal action;
- Avoid situations of mutual economic dependence by ensuring that suppliers diversify their customer base;
- Combat all forms of corruption in its relations with its stakeholders and act with integrity and transparency, in accordance with its Ethics Charter;
- Avoid any situation of real or apparent conflict of interest by exercising discernment.

In addition, Albioma particularly commits to:

- Ensure a healthy working environment with the best safety conditions, in particular for service providers and subcontractors working on Albioma sites, in accordance with the golden safety rules that protect the physical integrity of all employees;
- Systematically consider local suppliers, local service providers and local supply chains;
- Encourage suppliers who are committed to reducing their environmental footprint, and in particular their carbon footprint.

## 5. *Supplier commitments*

### General commitments

The supplier commits to comply with the laws and regulations in force in all the countries in which it operates.

### Social commitments

The supplier commits to respect Human Rights and to guarantee decent working conditions for its employees. The integrity of people who work for Albioma is an absolute, non-negotiable necessity.

In particular, the supplier commits to:

#### Prohibit child labour

- The supplier shall ensure that there is no recruitment or employment of children in its own activities or in its supply chains;
- It shall respect the minimum age mentioned in the fundamental ILO Convention (no. 138), or in applicable local legislation if that age limit is higher;
- It commits in particular to prevent the employment of children in violation of the ILO's Worst Forms of Child Labour Convention (no. 182);
- It commits not to entrust work involving particular health and safety risks to young people under the age of 18.

#### Prohibit forced labour and combat modern slavery

- The supplier shall ensure that forced or compulsory labour is not practised in any form whatsoever in its own operations and supply chains, as defined in the ILO's fundamental conventions (no. 29 and no. 105);
- Suppliers are prohibited from engaging in or benefiting from any form of human trafficking.

#### Combat illegal employment and job insecurity

- The supplier commits not to use illegal labour;
- All employees must have a recognised employment relationship established by national legislation;
- Any use of temporary, insecure or subcontracted employment arrangements must comply with applicable local legislation and must not be used by suppliers to avoid their statutory obligations as employers.

#### Prohibit harassment

- The supplier shall treat all employees with dignity and respect;
- Any verbal or physical threat, physical violence, sexual abuse or any form of harassment, in accordance with the fundamental ILO Convention (no. 190), is strictly prohibited.

## Combat discrimination and promote inclusion

- The supplier shall treat all its employees fairly. It shall promote diversity and ensure equal opportunities in the employment and treatment of employees;
- It shall avoid any discrimination based on race, ethnicity, nationality, religion, sexual orientation, gender, age, disability, sensitive medical conditions, trade union membership or activities, social background, family responsibilities, political opinion, etc.;
- In particular, there shall be no discrimination in terms of pay, recruitment, access to training, promotion, maternity protection or dismissal, in accordance with the fundamental conventions of the ILO (no. 100 and no. 111).

## Offer fair remuneration

- As a minimum, employees shall be paid the legal minimum wage and enjoy the employee benefits provided for by law;
- Salaries shall be paid on time and regularly;
- Overtime shall be paid at the statutory rate and the supplier commits not to make any deduction from remuneration for disciplinary action or any other measure not provided for in the legislation and without the employee's prior authorisation.

*Albioma encourages its suppliers to offer a living wage and fair benefits to its employees, sufficient to ensure a decent standard of living for workers and their families, taking into account the economic and social conditions of the country.*

*The elements of a decent standard of living include food, water, shelter, education, healthcare, transport, clothing and other basic needs, including provision for unforeseen events.*

## Ensure decent working hours

- Each employee is entitled to at least one day off in every seven-day period;
- Working hours, excluding overtime, are defined in the employment contract and shall not exceed 48 hours per week, or the legal limits if they are lower;
- The supplier may not impose excessive overtime. The total number of hours worked per week, including overtime, may not exceed the legal limits;
- The supplier commits to take into account its employees' issues in terms of work-life balance.

## Respect freedom of association and the right to collective bargaining

- The supplier commits to respect the fundamental conventions of the ILO (no. 87 and no. 98): "Freedom of association means that workers and employers may form, join and manage organisations of their own choosing without interference from the state or anyone else";
- The supplier commits to provide staff representatives with the appropriate means to exercise their rights, without using any form of intimidation or discriminatory practices against them.

## Guarantee employee Health and Safety

- Albioma encourages its suppliers to adopt a structured Health and Safety approach in all countries where they operate, in order to prevent accidents and occupational illnesses;
- The supplier commits to deploy its Health and Safety approach on the basis of the assessment of risks related to its activity;
- The supplier commits to put in place a regulatory training plan based on its company risk analysis to ensure that its employees have the necessary qualifications for the tasks for which they are responsible;

- The supplier commits to ensure that its employees undergo strict medical monitoring in accordance with current regulations;
- The supplier shall provide its employees with appropriate personal protective equipment;
- When visiting an Albioma site, the supplier commits to comply strictly with the safety rules and instructions presented to it during the mandatory safety induction. The supplier also commits to comply with the 10 golden safety rules formalised by Albioma.

## Contribute to driving local socio-economic development

- The supplier shall endeavour to put in place measures to benefit the local community, in particular by offering recruitment opportunities to local people or subcontracting to local companies;
- As far as possible, the supplier shall endeavour to source from local supply chains in order to maximise the economic and social benefits of its activities in the area in which it operates.

## Environmental Commitments

Albioma shall implement concrete actions to protect the environment, for which suppliers' cooperation is essential.

### Preventing damage

- The supplier shall apply the precautionary principle in approaching the environmental damage that its activity may cause;
- It shall take the appropriate measures to prevent such damage and ensure that its risks are controlled by complying with existing best practices.

### Implementing an environmental impact management system

- Where appropriate, the supplier shall implement an environmental impact management measure such as an Environmental Management System based on international standards;
- The supplier commits to report any environmental incident to the local authorities or the relevant environmental agency, as well as to Albioma, should it have an impact on fulfilment of the supplier's contractual obligations.

### Reducing the impact on the environment

- The supplier commits to implement actions to reduce its environmental impact in the following areas:

#### **Sustainable consumption of resources**

- The supplier commits to implement measures to limit its consumption of resources (raw materials, water, energy, etc.). This principle of sustainable consumption applies to the supplier's operations as well as to its procurement practices.

#### **Minimising the impact on the environment (air, water, soil)**

- The supplier commits to control its impact on the air, water and soil at all stages of its operations and shall implement the necessary measures to reduce it;
- All emissions or discharges into the air, water and soil shall be identified, monitored, controlled and treated in accordance with applicable regulations.

## Reducing waste and prioritising re-use and recycling

- The supplier commits to implement measures to prevent the production of waste, for example by reducing the quantities of raw materials used upstream;
- The supplier also commits to manage the waste it generates responsibly, always favouring re-use or recycling channels, in order to support the development of a circular economy.

*To reduce greenhouse gas emissions and combat global warming:*

- *Albioma encourages its suppliers to calculate their direct and indirect greenhouse gas emissions according to recognised standards, such as the Bilan Carbone® method or the GHG Protocol.*
- *Albioma expects its suppliers to define commitments to reduce their carbon footprint as well as that of their partners in order to align with the target of limiting global warming to 1.5°C set by the 2015 Paris Climate Agreement.*
- *Albioma encourages its suppliers to share their greenhouse gas emissions values with it so that they can be included in the calculation of the Group's carbon footprint.*

## Respect for legality and business integrity

Albioma expects its suppliers to operate in strict compliance with applicable national and international standards and regulations and to conduct their business activities with integrity.

### Combating corruption and preventing conflicts of interest

- The supplier shall reject all forms of active or passive corruption in both national and international transactions. It shall refrain from any practice aimed at directly or indirectly involving Albioma Group employees with whom it has business relationships in the development of their commercial relationships, whether on a personal basis or in any other form.
- The supplier commits to adopt exacting standards of behaviour to prevent and avoid conflict of interest situations.

### Respecting the rules of fair competition

- The supplier shall refrain from any practice the purpose or effect of which is to distort free competition.
- The supplier commits to determine its commercial and industrial policy and its prices independently, without exchanging commercially sensitive information with its competitors.

### Complying with the rules of international trade

- The supplier commits to comply with applicable international trade regulations, in particular export controls, embargoes and sanctions targeting countries, companies or individuals. This obligation applies throughout the duration of the contractual relationship with Albioma and will take into account changes in applicable international and national laws, regulations and standards.

## 6. *Implementation of the Supplier Code of Conduct*

Albioma commits to strictly comply with the principles set out in this Supplier Code of Conduct and expects its suppliers to put in place the necessary measures to ensure compliance within their companies.

In the event of non-compliance with this Supplier Code of Conduct, the supplier is required to draw up a corrective action plan as soon as possible.

Albioma reserves the right to terminate relations with the supplier in the following situations:

- in the event of a serious breach of the Supplier Code of Conduct,
- deliberate breach,
- failure to rectify a breach.

### Reporting a breach

#### Albioma whistleblowing system

Any breach of the obligations contained in this Supplier Code of Conduct may be reported:

- to an Albioma representative, who will inform the relevant department or
- by submitting a report on the Group's internal whistleblowing platform at the following address: <https://albioma.integrityline.com>. This online interface allows users to report in good faith any violations of laws, regulations or Albioma's internal rules, including this Supplier Code of Conduct, in a confidential and secure manner.

No report made in good faith shall damage the commercial relationship between Albioma and its supplier.

#### Supplier whistleblowing system

Albioma encourages its suppliers to put in place a system to enable their employees and external stakeholders to raise concerns without fear of reprisal.

#### Contact details

For any questions relating to this Supplier Code of Conduct, the supplier may contact Albioma directly at the following address: [compliance@albioma.com](mailto:compliance@albioma.com)