



EPC GROUPE RESPONSIBLE PROCUREMENT CHARTER

Our Group implements an approach based on sustainable development. It guarantees a high level of compliance by promoting collaboration with Suppliers¹ who commit themselves by its side and share its values.

The Group therefore expects Suppliers to comply with the standards set out in this Charter and to act ethically and responsibly.

In general, all Suppliers are also expected to comply with national, European or international corporate social responsibility legislation.

The Supplier is responsible for ensuring that all of its own subcontractors, suppliers and partners involved in the supply on behalf of the Group comply with the Charter.

¹ The term Suppliers means the Group's suppliers, subcontractors and service providers.

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Part 1: Social responsibility

I- Respect for human rights

The Group complies with the Universal Declaration of Human Rights, supplemented in Europe by the Charter of Fundamental Rights of the European Union and the European Convention on Human Rights and recognises all these rights for its stakeholders (employees, customers, etc.). It expects the same from Suppliers.

The Group pays particular attention to international laws and best practices regarding conflict minerals. It expects the same from Suppliers.

Everyone has the right to the protection of their personal data. Its processing by the Suppliers must be carried out in accordance with the General Data Protection Regulation (GDPR) and all other relevant laws and regulations.

In the event of an incident in the processing of the personal data entrusted, the Supplier undertakes to report it to the Group at the following address: compliance@epc-groupe.com as soon as it becomes aware and as soon as possible to limit its impact.

II- Working conditions

Suppliers must ensure compliance with the fundamental Conventions of the international labour organization:

- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
- Forced Labour Convention, 1930 (No. 29), (and its 2014 Protocol);
- Equal Remuneration Convention, 1951 (No. 100);
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111);
- Abolition of Forced Labour Convention, 1957 (No. 105);
- Minimum Age Convention, 1973 (No. 138);
- Worst Forms of Child Labour Convention, 1999 (No. 182).

1- Elimination of forced and compulsory labour

The Group strongly condemns modern slavery, regardless of its form (withholding identity documents, violence and threats, debt bondage, etc.).

2- Elimination of child labour

Suppliers must be able to guarantee the non-use of child labour.

The International Convention on the Rights of the Child defines a child as any person under the age of 18, unless majority is reached earlier under applicable law.

For the Group, a child who has not yet reached the mandatory school leaving age or the minimum age required to work in the country in which he/she lives is considered to be a child.

In any event, Suppliers must ensure that all employees under the age of 18 do not carry out any task that could be dangerous or harmful to them (health, safety, morals of the child).

3- Safety and protection of persons

Suppliers must ensure that employees, in the same way as the Group, evolve in a healthy and safe environment.

Our Suppliers are encouraged to identify the risks associated with their activities and provide measures to prevent accidents and personal injury. This requires, in particular, the dissemination of appropriate safety information, the transmission of which must be reinforced in the event of dangerous situations.

Any employee of the Supplier has the right to benefit from a health and social protection system in accordance with the local legislation in force.

4- Wages, rest and decent working conditions

Suppliers must undertake to comply with the rules in force concerning the right to payment of a regular salary, rest and legal benefits, rights conferred on any employee.

This requires compliance with a maximum number of weekly working hours and compliance with the weekly rest time.

The Supplier's employees must be paid at least the minimum wage and benefit, where applicable, from remuneration for overtime worked in accordance with the laws and regulations.

In general, the Group reiterates that the well-being of employees must be taken into account by Suppliers, which implies decent employment conditions.

5- Promoting labour relations

Suppliers shall ensure respect for freedom of expression, freedom of association and the right to collective bargaining.

6- Combating discrimination and promoting equal opportunities

Suppliers must pay particular attention to discrimination in terms of access to employment and career paths (access to training, promotion, termination of contract, retirement, etc.).

This attention should be given to all forms of discrimination (gender, ethnicity, etc.).

The Supplier must promote the inclusion of any person excluded from employment, particularly by reason of disability.

In general, it must promote within the company equal opportunities, diversity and the inclusion of all employees.

Part 2 - Responsibility and integrity in the conduct of business

1- Anti-corruption

The Group strongly condemns corruption. This commitment is reflected in the Anti-Corruption Code available on our website.

Suppliers must comply with the applicable laws and regulations in force. For non-taxable persons, processes appropriate to their size and risk should be put in place in order to prevent any act of corruption in the context of their activities.

Suppliers shall comply with applicable laws, directives and regulations recommending obligations in the fight against corruption and influence peddling.

In general, Suppliers comply with the most demanding criteria in terms of integrity in the conduct of professional interactions.

Suppliers must therefore deploy vigilance measures to detect risks in this area, in particular by monitoring the activity of third parties, verifying the identity of any contact person or recipient of funds, and locating the bank account.

They undertake not to make any offer, gift, promise or benefit to employees of the company in order to obtain a favourable decision.

II- Respect for information security and confidentiality

1- Management of so-called sensitive information

Suppliers must not, under any circumstances, use any proprietary or confidential information that they may have received in the context of their business relations with the Group, unless the latter has given its prior consent.

So-called sensitive information covers in particular all intellectual property rights and so-called inside information.

Suppliers shall not use sensitive information to carry out, directly or through a third party, transactions in the Group's listed securities or to guide the negotiation of contracts with third parties.

2- Data security

The Supplier must deploy a secure IT system which makes it possible to prevent digital attacks or possible data leaks.

If the Group provides access to its IT system, the Supplier must comply with the IT Charter issued by it. In all cases, the Supplier must comply with the security requirements that may be transmitted by the Group.

III- Compliance with sound governance and fair competition

The Group expects its Suppliers to have a governance system that complies with regulations and legislation.

1- Compliance with competitive practices

Suppliers undertake to compete in a healthy and fair manner on the market in compliance with the laws and regulations on competition law.

They must refrain from participating in any anti-competitive practice, regardless of its form (unlawful agreement particularly on prices, abuse of a dominant position, etc.).

2- Compliance with economic sanctions

Suppliers undertake to comply with and follow the regulations on economic sanctions including the control of exports, imports, embargoes and other restrictions (taxes, quotas, asset freezes, etc.)

As part of the business relationship, suppliers must guarantee that they will report any sanctions to which they are or may be subject.

3- Conflict of interest

Suppliers undertake to declare any conflict of interest or any situation similar to a conflict of interest of which they are or may have become aware.

4- Money laundering

Acts of corruption and influence peddling often take the form in practice of laundering and the use of forgery.

Suppliers must not participate in, facilitate and support money laundering.

IV- Building a lasting and balanced relationship with Suppliers

The Group wishes the relationship with Suppliers to be part of a sustainable value chain that makes it possible to promote a balanced relationship.

The Group strives to contribute to the development of the territories in which it operates and wants Suppliers to do the same. For this purpose, they must:

- create a network of relationships that contribute to their development while ensuring the smooth running of exchanges with in-country suppliers and the territorial impacts of their activities;
- seek to develop economic activity close to their area of influence.

Part 3 - Environmental responsibility

The Group seeks to reduce its environmental impact by taking into account the sustainability and durability of its actions.

As part of improving its environmental performance, the Group expects Suppliers to integrate environmental issues into their activities in order to offer the Group environmentally friendly products and services.

Suppliers must ensure that their practices allow:

- Sustainable, rational use of energy and natural resources (water, raw materials, etc.);
- Eco-design promotion;
- Implementation of logistics processes that make it possible to reduce their production of greenhouse gases.

Part 4 - Supplier adherence

Suppliers acknowledge that they have read the Charter and undertake to support the Group in the development of its CSR strategy by allocating the necessary resources to comply with its content.

For that purpose, they distribute the Responsible Procurement Charter to the employees concerned and the whistleblowing system on the group's website to enable the reporting of any violations of the principles set out in this Charter.

Suppliers agree to be assessed by the Group regarding compliance with this Charter.