



Supplier Code of Conduct

Purpose	This Supplier Code of Conduct (the “Code”) sets out the principles that must be respected by all suppliers working with the Vicat group, in all activities and everywhere in the world. It forms part of the Vicat group’s CSR process.
----------------	---

Contact	Hugues Sorez, Group Purchasing Director
----------------	---

Version No.	Date	Purpose
01	April 08 th , 2022	Initial version

	Name	Title/position
Owner	Hugues Sorez	Group Procurement Director
Verifier	Stéphanie Notin	Group CSR Coordinator
Verifier	Louise Salmaso	Group Legal Director

I. The Vicat group's ambitions

With a presence in 12 countries, the Vicat group offers a range of quality products and services that are accessible, safe and scalable to the needs of the construction industry. Its industrial and family-based company culture is guided, in the values cherished by its leadership and management, by five major principles that underpin its success.

- Local integration
- Commitment to partnership
- Responsible sustainability
- Shared passion
- Technical expertise.

The Vicat group is built on consistent and coherent governance, the stability of family shareholdings, and the powerful and passionate commitment of its colleagues, who subscribe to these values in all aspects of the business, including relations with suppliers, service providers and subcontractors ("Suppliers" from here on).

In compliance with its CSR process, the Group is convinced that synergies between economic performance, environmental engagement and social responsibility are essential to its current and future success.

In its business activities, for all links in the value chain, the Vicat group undertakes to comply with applicable laws and to contribute to the United Nations' Sustainable Development Goals. In pursuing these goals, the Vicat group also engages with its Suppliers, with whom it hopes to collaborate in the long term, in the expectation that they will take the same approach to promoting Sustainable Development as part of a corporate responsibility process (social, societal and environmental). This Code adopts a continuous improvement approach.

This Code is based on:

- the main recognised international standards such as:
 - The United Nations Universal Declaration of Human Rights
 - The United Nations Convention on the Rights of the Child
 - The eight fundamental Conventions of the International Labour Organisation (ILO)
 - The Paris Climate Agreement
 - The ten principles of the United Nations Global Compact
 - The Sustainable Development Goals adopted by the UN (2030 Agenda).
- specific Vicat group documents such as:
 - The Ethics Charter
 - The Anti-corruption Code of Conduct
 - The Responsible Purchasing Policy

By signing the Vicat group's Supplier Code of Conduct, the Supplier accepts these terms without reserve and promises the Vicat group that it will adhere strictly to the stated principles. Signing the Code is considered an essential prerequisite to any business relationship the Vicat group might initiate with a Supplier.

Where a local law or regulation offers greater protection than the Supplier Code of Conduct, Suppliers are required to adhere to this local law or regulation.

II. Vicat group commitments to Suppliers

The Vicat group pursues its activities in compliance with all applicable laws and regulations.

The Vicat group expects its employees to adhere strictly to applicable laws and internal directives as they execute their work. They conduct themselves as reliable and honest professionals for procurement and project development, in whom Suppliers can trust.

The Vicat group guarantees open, free, and legitimate competition between its Suppliers, based on free access to calls for offers or consultations, equal treatment of applicants, and transparent and traceable procedures.

In its relations with its Suppliers the Vicat group guarantees it will protect personal data communicated.

It is the Vicat group's aim, by way of its conduct, to meet requirements for quality, for adherence to commitments made, and for sustainable development and business ethics (as well as anti-corruption laws); these requirements also apply to its Suppliers.

III. Vicat group requirements of its Suppliers

The Vicat group requires compliance with the principles of good conduct described below, to establish effective long term relationships with Suppliers.

A/ Good social conduct:

Suppliers must comply with local, national and international regulations concerning employment and professional relations, and as a minimum adhere to the following standards:

-Human rights - fundamental freedoms:

Suppliers undertake to respect human dignity and rights and to comply with relevant international conventions protecting human rights, such as:

- The United Nations Universal Declaration of Human Rights
- The United Nations Convention on the Rights of the Child
- The ILO's fundamental Conventions and international labour standards

Suppliers must be vigilant in combating modern slavery and forced labour, particularly in their own supply chain. In particular there is an expectation in case of international service provision that the relevant regulations must be followed.

Only work undertaken by choice is authorised. There must be no constraint exercised over an employee to convince them to work. The following are considered to be forced labour: services provided unwillingly when threatened with a penalty (including illegal overtime), undeclared work, human trafficking, prisoner forced labour, slavery or serfdom.

Suppliers must provide evidence of their procedures for assessing and managing these risks.

-Child-labour prohibition:

Suppliers will not use labour of persons younger than the statutory school age in their country, or under any circumstances younger than 15 years old.

-Health, safety and hygiene at work:

The Vicat group is committed to the health and safety of its employees and of third parties.

Suppliers must as a minimum adhere to local and national laws and requirements on health and safety in the workplace, with the goal of avoiding accidents.

Suppliers take steps to ensure their employees have a safe and healthy working environment and to protect them from physical injury.

They must obtain the official authorisations, licenses and approvals required for the work environment. They must establish principles and/or processes, infrastructure and equipment for health and safety at work, all documented.

-Equal and fair treatment:

Suppliers provide all their employees with equal and fair treatment, removing all

discrimination from their decisions concerning recruitment, access to training, promotion and termination, on grounds of nationality, social or ethnic background, gender, religion, age, disability, sexual orientation, political opinion or any other form of discrimination, in compliance with current rules.

Illegal work practices and discrimination or harassment in the workplace, for instance in response to the exercise of workers' rights, whistleblowing, trade union participation or reporting of legal infringements, are prohibited.

-Labour law, training and remuneration:

In compliance with local laws and practices in their sectors of activity, Suppliers must adhere to applicable provisions for working hours, overtime, leave (paid leave, maternity leave, paternity leave), weekly rest and training. They must respect the right to form unions, to group together and/or negotiate with employers through collective action.

Disciplinary measures adopted by Suppliers must be proportionate, and no employee of a Supplier should suffer physical disciplinary measures, injury or mental or sexual harassment. Suppliers adopt remuneration policies that meet or exceed the legal minimum wage set by national or local legislation; in the absence of specific legislation they provide a regular salary that as a minimum meets the basic needs of their employees, defined in relation to each locality.

Suppliers pay into statutory social security systems applicable in each country.

B/ Good environmental conduct:

-Compliance with environmental regulations:

Suppliers must as a minimum comply with all regulations (local, regional, national and international) concerning environmental protection applicable to them. All their activities with environmental impacts must be covered by the necessary authorisations and licences delivered by the competent authorities.

-Measures to promote responsible use of raw materials, energy and natural resources, and proper effluent and waste management:

Suppliers must implement concrete measures to control consumption of water, energy (cf. ISO 50001), natural resources and all raw materials required for their activities.

They must aim to separate their economic performance from their environmental footprint, in particular by taking steps to promote the circular economy.

They must also reduce and/or process their airborne emissions and effluents to the ground, underground and into water, as well as waste of all types resulting from their activities, particularly dangerous waste.

Suppliers will optimise their transport strategies to limit the environmental footprint of all products transported. They must therefore consider transport methods, distances, types of packaging material and quantities.

They will be particularly attentive to water use when maintaining and washing tanks and other containers. They will make every effort to prioritise water-borne and rail transport, while limiting transloading.

-Commitment to de-carbonising the value chain:

Whether with measures to improve energy efficiency or to use alternatives to fossil fuels, or by extending product life, using CO₂ capture, and so on, Suppliers undertake to contribute to the Vicat group's Climate Strategy, which is targeting carbon neutrality for its entire value chain by 2050. Preventive and corrective actions of the risks of damage to the environment must be prioritized. Suppliers undertake to share their CO₂ indicator data with the Vicat group if so requested, for calculating Scope 3 of its carbon balance.

-Promote convergence between industry and respect for biodiversity:

Suppliers must seek to reduce their impact on biodiversity in the same way as they address elements connected to climate change, the two factors being intrinsically linked. In particular, special attention must be paid to the rehabilitation of sites following their use and to restoring biodiversity. Also when establishing a facility, the local ecosystem must be respected, particularly if close to protected areas, for example through consultation with specialised NGOs.

When procuring raw materials, certifications and labels must be sought that will guarantee respect for biodiversity throughout the value chain. For example, for paper pulp, FSC and PEFC labels, with efforts to promote zero deforestation and zero soil artificialisation, should be prioritised.

Use of products that negatively affect biodiversity should be reduced, to be replaced with products that are less eco-toxic.

C/ Good ethical conduct:

Suppliers undertake to support the values and commitments contained in the Vicat group's ethical charter - available on the www.vicat.fr website, and comply in particular with the legal and regulatory provisions on anti-corruption.

-Business integrity, anti-corruption:

Suppliers must strictly adhere to the ban on corruption and bribery. They must neither corrupt others nor be corrupted. They must not offer, provide or demand any financial benefit or other illicit advantage, neither directly, nor indirectly.

Gifts must comply with normal commercial practice connected with promoting the business and be professional in nature. They must not be in cash or cash equivalents.

The Vicat group requires Suppliers not to offer any favour, including free products or services, employment opportunities or sale to an employee of the Group in order to influence their business with the Group.

Suppliers must disclose any personal interest, financial or other, connecting them to a Vicat group employee, that might interfere in their relationship or possibly create a conflict of interest.

-Transparency:

Suppliers work transparently and communicate information concerning their economic and financial situation honestly and in compliance with regulations and current practice in their sector.

-Legitimate competition:

Suppliers comply with laws and regulations concerning free and fair competition, refraining from all abusive or illicit conduct and all anti-competitive abuses and practices: understandings, abuse of a dominant position, abusive exploitation of a situation of economic dependency affecting a customer or Supplier.

-Intellectual property:

Suppliers undertake to respect the Vicat group's intellectual property rights to inventions, developments, concepts, trade secrets, patents, trademarks and all other intellectual property rights.

-Confidentiality and personal data protection:

Suppliers undertake to protect personal and confidential information to which they have access, adhering to the laws and regulations applicable in the relevant country. In their relations with the Vicat group, Suppliers guarantee they will protect any personal data communicated.

-Money laundering:

Suppliers must comply with applicable accounting and banking standards and procedures, as well as international treaties and local and national legislation on money laundering and fraud.

No action that might directly or indirectly lead to helping with laundering capital is permitted. Suppliers undertake to adhere strictly to national and international legislation in this area and to obtain sufficient and suitable knowledge of the source of any funds made available for transactions in which they are an intermediary. To this end they must have an internal procedure for ensuring their activity remains compliant with laws and regulations against money laundering, such as a know your customer procedure and a procedure to filter transactions (thresholds, payment methods, payment origins).

-Against the financing of terrorism:

Financing of terrorism involves providing funds that might be used in the context of terrorist activities. Suppliers must be sure they are aware of the real beneficiaries of transactions executed by their organisation and must strictly adhere to accounting standards for keeping financial records and reports applicable to payments forming part of financial or economic operations. No action that might directly or indirectly lead to helping terrorist action is permitted.

-Vigilance concerning international sanction programmes and embargoes:

Suppliers undertake to comply with international sanction programmes imposed by the United Nations, the European Union, the United States and by the national legislature to which they are subject. To this end, they must demonstrate vigilance in preventing as far as possible any operation involving a country that is under embargo / restrictive measures, or a person or entity on a sanction list, that would involve breaching international sanction programmes, embargoes or restrictive measures.

-Whistleblowing and absence of reprisals:

Suppliers undertake to notify the Vicat group of any breach of the environmental, social and ethical principles in this Code and to encourage their staff internally to express any concerns and raise the alarm or denounce any violation of legal and ethical standards, with no fear of reprisals.

IV. A shared approach

The Vicat group and its Suppliers work together with a shared approach to identify critical points in the supply chain in relation to the principles supported, to define the concrete actions needed to manage the risks identified, and to ensure monitoring with particular attention given to the following points:

- Managing environmental impacts: resource management (water, energy, raw materials, developing new replacement technologies), reducing impacts on biodiversity, reducing greenhouse gas emissions, reducing and recycling waste, eco-design.
- Managing social impacts: integrity and respect for fundamental rights, child labour, forced labour, worker hours and conditions, health and safety (reducing workplace accidents involving employees and subcontractors) fraud and corruption, purchasing from the protected workers sector, and integrating persons with difficulty accessing employment through economic activity, local integration and local purchasing.

The Vicat group and its Suppliers agree to be particularly vigilant in implementing this Code in countries where they work that have not signed the ILO's Conventions.

The Vicat group encourages Suppliers to give notification of any action taken to improve their practices for social responsibility and to make suggestions.

Suppliers undertake to respond to CSR questionnaires and/or to receive auditors, internal or external, appointed by the Vicat group to verify the application of this Code.

V. Application, distribution, monitoring and non-compliance with the Code

Methods for application, distribution and monitoring

This Code applies to all Vicat group Suppliers. New Suppliers are invited, as part of pre-qualification, to undertake compliance and to meet the requirements set out within it.

Suppliers already working with the Vicat group are invited to commit to the Code and meet the requirements set out within it.

As part of the duty of vigilance, the Vicat group expects its Suppliers to also require their own suppliers to adhere to the requirements and content of this Code.

This document applies generally and is not to be adapted for individual Suppliers.

Non-compliance

The Vicat group reserves the right to verify whether its Suppliers are complying with the requirements of this Code. Suppliers will provide the necessary information for verification and assessment in relation to the principles of this Code, in particular documentation for corporate and environmental authorisations, permits and licences.

In case of failure by a Supplier to comply with this Code, the Vicat group reserves the right to break off the business relationship.

Date:

Supplier name and address:

Name and title of Supplier representative:

Signature and stamp: