

SUSTAINABILITY / 2023 PROCUREMENT CHARTER





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INTRODUCTION

In accordance with its mission and its family values, Groupe Atlantic has committed to eco-citizenship management for several years, including the preservation of the environment and of the well-being of people both in France and abroad.

Groupe Atlantic's procurement policy relies on relationships of trust and long-term partnership with its Suppliers. The longevity of this relationship is based on daily operational excellence (competitiveness, quality in both products and delivery, customer service, etc.) as well as a consideration of the challenges of keeping the activities of all players both acceptable and sustainable in the long term.

This charter is a formal embodiment of some of Groupe Atlantic's commitments as well as those expected from its Suppliers (this name also includes all subcontractors and service providers) with regard to the environment, protecting people's health and safety, ethics and compliance with labour laws. Some of these criteria may be subject to audits, be incorporated into calls for tenders and decisions regarding the placement of new business, or form significant parts of contracts signed with Suppliers.

Groupe Atlantic may verify the Supplier or their subcontractors' compliance with the principles described below through requests for documentation (certificates, test reports, etc.) in addition to on-site evaluations and audits performed by Groupe Atlantic or by an authorised firm with the relevant expertise. In the event of failure to comply, Groupe Atlantic may require the Supplier to implement a corrective action plan. In the event of a serious breach or a failure to rectify a situation of non-compliance, Groupe Atlantic reserves the right to withdraw from commitments with respect to the Supplier.

IN A MORE GENERAL SENSE, A SUPPLIER'S FAILURE TO COMPLY WITH THE COMMITMENTS BELOW COULD LEAD TO PARTIAL OR TOTAL DELISTING ON THE GROUPE ATLANTIC SUPPLIERS PANEL.

GROUPE ATLANTIC ALSO EXPECTS THAT ITS SUPPLIERS WILL EXTEND THESE SAME PRINCIPLES TO THEIR OWN SUPPLIERS, SUBCONTRACTORS AND SERVICE PROVIDERS.

COMMITMENTS FOR ENVIRONMENT

OUR CHALLENGES

Groupe Atlantic has committed to an environmental management approach, especially in order to:

- /// Ensure that its range of products evolves into safe, sustainable solutions with a focus on products that use renewable energy
- /// Reduce energy consumption and carbon emissions produced by Group business activities
- /// Control waste generated by Group business activities
- /// Advise and train customers in the sustainable use and installation of Group products.

This responsibility extends to Group Suppliers, stakeholders in its ecosystem.

OUR REQUIREMENTS

The Supplier therefore has a duty to prevent of and minimise the impact of their business activities and of their products and services on the environment. More specifically, the Supplier must ensure that it:

- /// Reduces its energy and water consumption
- /// Limits its discharges into water, air and soil, as well as the noise level of its business activities
- /// Limits its production of waste and allow them to be recycled and recovered as much as possible
- /// Avoids or limit the use of hazardous productsx
- /// Implements logistical strategies for optimising and streamlining transport in order to reduce its carbon footprint
- /// Promotes the eco-design of its products, particularly by prioritising responsible natural resources or raw materials and recycled packaging.



Furthermore, the Suppliers must comply with the environmental regulations that apply to their business or to their products. With regard to the European market, the Supplier undertakes to comply with and meet all obligations in terms of European rules pertaining to:

- /// the registration, evaluation and authorisation of chemical substances (REACH regulation),
- /// the classification, labelling and packaging of substances and mixtures (CLP regulation),
- /// the outlawing of the use of certain hazardous substances in electric and electronic equipment (RoHS directive).



HUMAN RIGHTS, HEALTH AND SAFETY

OUR CHALLENGES

Groupe Atlantic is implementing methods to ensure the safety of all people on its sites, and more generally to inspire the use of best safety practices among all of its employees from the moment they join the Group and all throughout their career. In addition, user safety constitutes an essential area of focus for the design and manufacture of all products sold by Groupe Atlantic.

OUR REQUIREMENTS

When it comes to Suppliers, Groupe Atlantic expects the same rigorous attention to all of the aspects that could endanger the health and safety of employees, subcontractors or visitors on their own sites as well as the ones of its products' users. The Supplier must, of course, comply with regulations that apply to their personnel in terms of health and safety and therefore:

- // Ensure that people on their sites are protected by suitable personal or group protective equipment
- // Actively prevent workplace accidents, particularly seeking to eliminate the most serious accidents
- // Strive for the continuous improvement of employee working conditions
- // Ensure that people on its sites work under dignified conditions (drinking water, toilets, etc.)
- // Ensure the safety of all people within the production environment, particularly those using or with access to production tools.



**STRIVE FOR
THE CONTINUOUS
IMPROVEMENT
OF EMPLOYEE
WORKING
CONDITIONS**



ETHICS

Transparency and equity are essential conditions of a healthy, long-lasting business relationship. Groupe Atlantic undertakes to comply with applicable regulations in terms of business ethics and expects its Suppliers to do the same.

Corruption /

OUR CHALLENGES

Partnerships between Groupe Atlantic and the Supplier must not give rise to behaviours or acts which could be classed as corruption, influence peddling or favouritism.

OUR REQUIREMENTS

The Supplier shall not give to any employee of Groupe Atlantic gifts or entertainment offers as well as any benefit that may corrupt, influence or interfere with the integrity, judgment or objectivity of said employees in their relationship with the Supplier.

Within the meaning of the present Charter, corruption must be understood as giving or offering money, items or services to a person or a company that holds power in exchange for an undue advantage.

Any act of corruption as defined hereinabove or any violation of a legal or regulatory anti-corruption provision will be considered to be a violation of the present Charter. If the Supplier commits an act of corruption, Groupe Atlantic will then be within its rights to terminate any business relationship without notice, without prejudice to damages and interest that Groupe Atlantic will be legally entitled to claim to remedy the harm incurred.

The Supplier must also refrain from:

- /// Requesting the personal contact details of Groupe Atlantic employees
- /// Paying transport or accommodation costs for Groupe Atlantic employees at the time of any contact or visit.



**ESSENTIAL
CONDITIONS OF
A HEALTHY,
LONG-LASTING
BUSINESS
RELATIONSHIP**



Conflicts of interest //

OUR CHALLENGES

Each Supplier must ensure that its business activities and interests does not come into conflict with those of Groupe Atlantic. Indeed, Groupe Atlantic must be able to take each decision in an objective manner, in the best interest of the company.

OUR REQUIREMENTS

There are conflicts of interest when an employee or one of their friends or family is likely to personally benefit from a transaction concerning a Groupe Atlantic entity. As a result, the Supplier undertakes to inform Groupe Atlantic of any potential risk of a conflict of interest that they may be aware of during the purchasing process, particularly in the event of a relationship between the Supplier and any natural or legal person involved in the purchasing process.

Free competition //

OUR CHALLENGES

Groupe Atlantic undertakes to treat its Suppliers with honesty and respect, providing equal opportunity to each of them during the panel selection phases as well as when awarding contracts. Suppliers are selected impartially based on predefined, transparent criteria.

OUR REQUIREMENTS

The Supplier must refuse any action likely to tamper with the free play of competition and to contravene the rules of competition law.

Dominant business position //

OUR CHALLENGES

Groupe Atlantic endeavours to avoid any situation of business dependency that could endanger its Suppliers.

OUR REQUIREMENTS

As such, Groupe Atlantic encourages its Suppliers to diversify their clientele in order to avoid a significant situation of business dependency. Additionally, should the amount of purchases that Groupe Atlantic makes from the Supplier exceed 25% of the latter's turnover, a plan of action will be established in order to decrease the dependency rate to below 25%.

Whistleblower reporting //

OUR CHALLENGES

In order to ensure the greatest success for its desire to have an ethics-based relationship with its Suppliers, Groupe Atlantic has also established a dedicated email address:

nocorruption@groupe-atlantic.com

OUR REQUIREMENTS

The Supplier shall notify Groupe Atlantic - via this email address - of any behaviour by a Groupe Atlantic employee that it may deem non-compliant with the principles laid out hereinabove. All information exchanged via this email address will be handled in a confidential manner by Groupe Atlantic.



COMPLIANCE WITH LABOUR LAWS

OUR CHALLENGES

Concerned with promoting the respect for and employment of people of all backgrounds, the Group endeavours to develop a policy of fair and equal treatment. Multiple initiatives for diversity and the employment of people with disabilities attest to this commitment.



THE GROUP ENDEAVOURS TO DEVELOP A POLICY FOR EQUITABLE TREATMENT

OUR REQUIREMENTS

The Supplier must comply with labour regulations applicable to its business activity and within the countries in which it operates, as well as the following principles:

- Not to resort to forced or compulsory labour. Not to resort to illegal labour.
- Not to use child labour as defined by the International Labour Organisation.
- Comply with local legislation pertaining to working hours.
- Comply with, where applicable, local minimum wage legislation.

It must also comply with the following principles insofar as is permitted by the laws of its country:

- Freedom of association and the right to collective bargaining.
- Elimination of employment and occupation discrimination (with regard to religion, gender, sexual orientation, disability, etc.).

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