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GROUPE SOGESTRAN group's Business Conduct for Suppliers

Introduction

Groupe Sogestran conducts its business with integrity and with respect for the interests of others.

This 'Business Conduct for Suppliers' ("Code") outlines the principles for our business relationship with suppliers and its agents ("Supplier"). It establishes certain standards that must be respected when conducting business with groupe Sogestran.

By accepting these principles, a Supplier commits to fulfill them in all existing and future agreements and business relationships with groupe Sogestran.

Compliance with this Code

The Supplier shall at all times ensure that it complies with the obligations set out in this Code.

The Supplier shall, upon the request of groupe Sogestran, provide evidence of its compliance with the obligations set out in this Code.

The Supplier shall use all efforts to ensure that all members of its Group of companies and all of its sub-suppliers involved in the supply of products and/or services to groupe Sogestran comply with the requirements set out in this Code.


Compliance with Laws

The Supplier shall comply with all applicable laws and regulations, including without limitations those relating to the sections listed below.

Anti-Corruption

The Supplier shall not, in the conduct of its business, engage in fraudulent activities or extortion. The Supplier shall not offer, pay, request or accept a bribe. The Supplier shall refrain from acting in a situation that would create a conflict of interest with a groupe Sogestran representative.

The Supplier shall not offer, pay, solicit or accept any money, goods or services likely to influence any decision of one or more representatives of groupe Sogestran.

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Presents and gifts are tolerated when they represent a symbolic value and / or do not constitute a personal benefit given to a representative of groupe Sogestran. For reference, these are tolerated if they represent an annual cumulative value of less than € 65 individual (cf. General French tax code Annexe 4_art 28-00A). groupe Sogestran representatives are free to refuse them and then the Supplier shall not insist.

Invitations to business lunches, seminars and events will be tolerated as long as they are of public and / or professional nature in line with the missions of groupe Sogestran guests.

Human Rights

The Supplier shall support and respect the protection of internationally proclaimed human rights.

Employment Practices

a) Anti-Discrimination

The Supplier shall not discriminate, either positively (unless required by applicable law) or negatively, on the basis of race, age, religion, sex, marital status or sexual orientation in its workplace.

b) Safe and Healthy Working Conditions

The Supplier shall provide its employees with safe and healthy working conditions. The Supplier shall conduct regular reviews of health and safety conditions in its facilities and take relevant corrective actions where necessary.

The supplier will notify groupe Sogestran of any situation that violates the above principles and that he would have to meet or face.

c) Child Labor

The Supplier shall not employ children under the legal working age and shall not support child labor in any form. At no time shall the Supplier engage any child in any occupation or employment which would prejudice his/her health or education, or interfere with his/her physical, mental or moral development. The Supplier shall abide by the UN Declaration on the Rights of the Child at all times.

Fair Employment Terms

a) Working Hours and Wages

The Supplier shall comply with applicable laws, regulations and industry standards on working hours, including overtime. The Supplier's employees and subcontractors shall be provided with wages that at least meet minimum standards and are sufficient to meet basic human needs.

b) Forced Labor



The Supplier shall not use any prison or forced labor of any kind. Forced or compulsory labor shall mean all work or service which is demanded from any person under the threat of any penalty and for which the said person has not offered voluntarily.

c) Freedom of Association

The Supplier shall endorse the freedom of association and the right to collective bargaining for its employees.

Environmental Requirements

The Supplier must operate with care for the environment, run its business in an environmentally sound manner, and demonstrate a precautionary approach to environmental impact reduction. The Supplier shall maintain an environment management system and demonstrate a high level of environmental protection in sourcing, manufacturing, and transportation activities.

Assurance, Audit and Termination

Groupe Sogestran reserves the right to verify the Supplier's and all members of its Group's of companies' compliance with this Code through one or a combination of several assurance processes. Such assurance processes can include pre-announced inspections by groupe Sogestran or third party auditors. Inspections shall be requested and performed in such a manner as to avoid unrestricted disclosure of Supplier's confidential information and without disrupting Supplier's work unduly.

If groupe Sogestran becomes aware of any actions or conditions not in compliance with this Code, groupe Sogestran group can demand that corrective measures be taken. Groupe Sogestran reserves the right to terminate any purchase or other agreement with the Supplier if it or any member of its Group does not comply with the Code, without incurring any liability towards the Supplier or its Group.

The obligations under this Code shall continue in force in respect of any deliveries from the Supplier to groupe Sogestran, regardless of the termination or expiry of any purchase or other agreement between the parties.

Company:	Name / Position:
Date:	Signature and stamp: (Add written notice "approved")