



**June 2023**

## **PREAMBLE**

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The EDITIS Group's Sustainable Purchasing Policy sets out the principles designed to ensure ethical and sustainable business relationships between group companies and suppliers of goods and services and subcontractors, in strict compliance with applicable laws and regulations and the Group's commitments in matters of Compliance and Corporate Social Responsibility (CSR).

These principles reflect the group's commitment to undertake all necessary efforts to mitigate risks and prevent serious violations in the areas of ethics, the environment and human rights associated with its business activities, and to optimize its positive impacts throughout its value chains, as part of a sustainable purchasing approach.

Purpose of the Sustainable Purchasing Policy:

- ⇒ To share the commitments of the group and its collaborators with its suppliers and subcontractors,
- ⇒ To ensure their involvement in an approach in favor of the fight against corruption, Sustainable Development and/or CSR.

The EDITIS Group expects its suppliers and subcontractors to comply strictly with the laws and regulations applicable in the countries where they operate or provide services, as well as a commitment to collaborate with the group to implement compliance with the principles of its compliance program and its CSR commitments and, if necessary, to take any appropriate corrective action in an ongoing improvement process.

***Michèle Benbunan***

*CEO*

## **THE EDITIS GROUP'S COMMITMENTS TO ITS SUPPLIERS AND SUBCONTRACTORS**

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### **THE EDITIS GROUP COMMITS TO:**

- Develop sustainable business relationships that are propitious to the prevention and handling of risks and issues relating corruption, influence peddling, human rights, working conditions, environmental protection and, overall, business ethics;
- Maintain an open and constructive dialogue with its suppliers and subcontractors regarding their ability to meet their commitments, and help them, to the extent possible and in a spirit of cooperation, to develop and implement appropriate action plans;
- Implement internal measures and policies that are required, particularly due to the Sapin II and Duty of Vigilance laws;
- Select suppliers and subcontractors fairly and impartially, based on predefined criteria and objectives, including ethical criteria;
- Avoid situations of economic dependence;
- Identify and prevent conflicts of interest in relationships with suppliers and subcontractors;
- Promote anti-corruption, social and environmental clauses in calls for tender whenever possible;
- When possible, give preference to candidates with the best anti-corruption and CSR performances;
- Raise awareness and train its collaborators, in particular its purchasers, on its compliance program and its CSR commitments.

## **COMMITMENTS THE EDITIS GROUP EXPECTS FROM SUPPLIERS AND SUBCONTRACTORS**

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The EDITIS Group attaches particular importance to respect for fundamental rights and freedoms, fair commercial practices, and the prohibition of corruption. The group intends to promote these principles in the context of its activities and expects the same level of commitment from its third parties.

In this regard, by joining the United Nations Global Compact, the EDITIS Group has undertaken to support, apply and ensure the application by its subsidiaries of fundamental principles in the following areas: human rights, international standards of labor, environmental protection, and the fight against corruption.

The EDITIS group encourages its suppliers and subcontractors to respect these principles of the United Nations Global Compact. The rules laid down come from the International Labor Organization, namely:

- the fight against child labor and forced labor,
- compliance with the rules relating to working hours, wages, and social benefits,
- freedom of expression,
- the fight against all forms of discrimination and harassment,
- equal opportunities.

The EDITIS Group's suppliers and subcontractors acknowledge that their commitments to human rights, working conditions, environmental protection and business ethics are essential to the establishment and pursuit of commercial relations with the EDITIS Group, and undertake to demonstrate transparency, good faith and cooperation to ensure compliance at all stages of the relationship.

Suppliers/subcontractors undertake to comply with all national and international standards applicable to their activities in the following areas, in particular:

## **a. Social issues and human rights**

- Not to tolerate, under any circumstances, any recourse in the framework of their activities to:
  - the use of child labor, other than in the exceptional cases allowed by Convention Nos. 138 and 182 of the International Labor Organization (ILO);
  - any practices qualifying as modern slavery or forced, compulsory or clandestine labor within the meaning of ILO Conventions Nos. 29 and 105; or,
  - any form of physical, moral, or sexual harassment or any form of discrimination based on origin, gender, sexual orientation, age, family status, pregnancy, physical appearance, state of health, nationality, or union or religious membership within the meaning of ILO Convention Nos. 100, 111 and 156.
  
- Provide their employees decent working conditions and maintain health and safety standards that are compliant with ILO Convention Nos. 102 and 155.
  
- Guarantee their employees clear working hours, remuneration commensurate with hours worked and equal pay, along with breaks and vacations.
  
- Ensure that wages paid to their employees are adequate to provide a decent standard of living and to meet basic needs, with due regard to the general level of wages, the cost of living and social security benefits, and that they are paid on a regular basis and within a reasonable time (ILO Convention Nos. 95 and 131).
  
- Respect employees' freedom of association and collective bargaining rights, or, where locally restricted or prohibited, allow any other forms of representation and free and independent bargaining (ILO Conventions Nos. 87, 98 and 154).
  
- Offer and promote access to training and skills development for employees.
  
- Apply no less favorable treatment to migrant employees and respect the principles of ILO Convention No. 97.
  
- As part of the EDITIS Group's commitment under the Agreed Agreement for the employment of people with disabilities (2023-2025) and its adherence to the

Inclusion Manifesto, the group encourages its suppliers and subcontractors to adopt the following steps:

- implement concrete measures to promote the integration of people with disabilities,
- use the services of Adapted Enterprises, Specialized Work Assistance Establishments and Disabled Self-Employed Workers, with a view to awarding them orders and subcontracting assignments that meet our quality requirements,
- share with EDITIS CSR (RSE@editis.com) any initiatives to promote inclusion and professional equality that have been implemented in their company.

## **b. Business ethics and compliance**

- Fight against corruption and conflicts of interest in their activities and their relations with their own suppliers and subcontractors, by adopting a "zero tolerance" policy in this area.
- In this respect, not to solicit, offer or accept, directly or through an intermediary, any gift, offer, promise, or benefit whatsoever for themselves or for a third party, for the purpose to performing or refraining from any act within the scope of their duties. Do not make facilitation payments and avoid any behavior that could constitute influence peddling.
- Respect the Economic Cooperation and Development (OECD) fundamental principles and guidelines on the prevention of corruption and influence-peddling and any similar legal provisions as well as French regulations (where applicable). They must also prevent these practices by taking effective measures with their respective shareholders, corporate officers, employees, affiliates, subcontractors, suppliers and their respective representatives who are directly or indirectly involved in any way whatsoever, in the business relationship.
- Comply with all national and international standards related to financial misconduct, especially those related to the financing of terrorism, money laundering, embargoes, and arms and narcotics trafficking.

- Suppliers and subcontractors must promote free competition by forbidding any consultation or agreements on pricing and offers and participation in any cartels.
- More generally, respect the Compliance rules and policies implemented by the EDITIS group.
- Finally, to report any breach

### **c. Environment**

- The EDITIS Group is committed to a climate policy designed to reduce the impact of its activities on the environment, particularly in terms of resource use and greenhouse gas emissions. In this context, the group encourages its suppliers and subcontractors to:
  - adopt a sober approach to resources, to optimize their water and energy consumption, preserve biodiversity, and manage their waste and all types of discharges.
  - reduce their greenhouse gas emissions and treat their emissions into the air, their effluents to land and/or water, and any pollution of any kind resulting from their activities.
- Comply with environmental protection rules and do whatever is possible to prevent, mitigate and repair any negative impacts of their business activities.
- Offer and, to the extent possible, implement increasingly efficient environmental solutions.
- Share with EDITIS's CSR department (RSE@editis.com) any commitments and actions to preserve the environment and biodiversity that have been implemented within the company.

## COMPLIANCE AND IMPLEMENTATION OF THE EDITIS' SUSTAINABLE PURCHASING POLICY

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### **a. Dissemination of the policy and mechanisms in place to ensure compliance**

Suppliers undertake to communicate the present sustainable purchasing policy to their employees and to ensure that they scrupulously respect the principles defined herein.

Suppliers also undertake to ensure that their own subcontractors, service providers, partners and suppliers comply with all the provisions of the present sustainable purchasing policy.

Suppliers also undertake to implement an interne policy enabling their employees to report, without fear of reprisal, any legal or ethical difficulty or non-compliant behavior. More generally, to ensure the proper application of the provisions of the present sustainable purchasing policy and compliance with related regulations, Suppliers undertake to set up appropriate control, awareness, and warning systems within their organization.

### **b. Monitoring and control**

The provisions of this sustainable purchasing policy form an integral part of the contractual relationship between EDITIS Group and its Suppliers. Compliance with these provisions is essential to maintain a healthy, sustainable, and responsible business relationship.

Accordingly, the EDITIS Group may, at any time during the term of its commercial relations with Suppliers, request proof that they are complying with the requirements prescribed by this sustainable purchasing policy, and carry out audits or have audits carried out, to ensure that the policy is being properly applied. In the event of an audit, the Supplier undertakes to grant the EDITIS Group's staff (or service providers) access to its premises and sites and to provide any information and/or documentation that the EDITIS Group may request to enable it to carry out this audit.



Suppliers also undertake to inform the EDITIS Group without delay of any serious infringement or of any element that may constitute a serious infringement of the provisions of the Charter.

Suppliers acknowledge that they are fully aware that compliance with all the provisions of this Charter is essential for the EDITIS Group. Thus, any serious and/or repeated breach by a Supplier of any of these stipulations will constitute a serious contractual breach conferring the right on the EDITIS Group to immediately suspend the performance of its commercial relationship with the Supplier, by simple notification to the Supplier, and/or to terminate any contract entered with the Supplier with immediate effect.

### **c. Professional whistleblowing system**

The EDITIS Group has set up a whistle-blowing system enabling its employees to report, in confidence, any situation or bad practice of which they are aware.

This system is available to Suppliers who have good reason to suspect that they may be in breach of one of the provisions of the present sustainable purchasing policy, at the following address: [compliance@editis.com](mailto:compliance@editis.com).

The undersigned *Last name / First name*:

.....

Duly authorized\*, in my capacity as / *Position of representative*:

.....

Within / *Company name*: .....

hereby confirms to have taken full cognizance of the EDITIS Group's Sustainable Purchasing Policy. Any failure by the supplier or subcontractor to comply with this policy may be considered a breach of contract and may result in the termination of the contract, depending on the seriousness of the offense.

In:

Signature :

The : \_\_\_/\_\_\_/\_\_\_

Please return by e-mail to: [compliance@editis.com](mailto:compliance@editis.com) Thank you in advance!

*\*by a person authorized to bind the supplier or subcontractor*