



RESPONSIBLE PURCHASING CHARTER

October 2023 – Version 1. 1

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FOREWORD

The Heppner Group has structured its Corporate Social Responsibility policy, which is grounded in governance at the highest level of the company.

We put CSR at the core of our Group's strategy and we consider it to be a key factor in creating value for the entire Heppner Group and for all our stakeholders.

We show our voluntary commitment to CSR through our alignment with the principles of the Global Compact and the progressive integration of the 17 Sustainable Development Goals (SDGs). In addition, our proactive, engaged CSR approach is based on the core issues of ISO 26000 with the goal of transforming it into a lever for innovation and competitiveness. Heppner's teams have also acted ahead of the Climate & Resilience Law to ensure continued sustainability of the services we provide for our customers.

The Heppner Group has set out these principles in a responsible purchasing charter, which forms part of the relationship with its suppliers and subcontractors. This charter is an integral part of the contracts awarded by the Group and a reference framework for the Heppner Group's purchasing function.

Our wish is to develop business relationships that are consistent with our CSR strategy. Accordingly, we ask our suppliers to undertake to abide by it and apply practices in their work that align with it and comply with current regulations and ethical principles.

By joining our Charter, the supplier commit both themselves and their subcontractors.



Stéphanie BERTHET

CPO



Jean-Thomas SCHMITT

CEO

Heppner Group corporate responsibility commitments

The Heppner Group complies with the labour, safety and environmental legislation in force in each country where we operate.

The Heppner Group abides by the 1948 United Nations Universal Declaration of Human Rights and its two complementary covenants (the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights).

The Heppner Group abides by the Fundamental Conventions of the International Labour Organisation (ILO), in particular, Convention C138 and the ILO Declaration on Fundamental Principles and Rights at Work.

The Heppner Group abides by the principles set forth in the OECD and UN conventions on the fight against corruption.

The Heppner Group is a signatory of the United Nations Global Compact and undertakes to abide by its 10 principles:

Human rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: Businesses should make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: Businesses should contribute to the elimination of all forms of forced and compulsory labour.

Principle 5: Businesses should contribute to the effective abolition of child labour.

Principle 6: Businesses should contribute to the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.

Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Should the above-stated texts not be applicable in the countries where the Supplier is operating, it will nevertheless undertake to abide by the principles set forth in them.

Heppner Group commitments to its suppliers and subcontractors

The relationship between the Heppner Group and its suppliers is a key issue for Purchasing Management. Our suppliers are one of the vectors of our Group's growth and success.

These commitments set out the principles that guarantee a fair purchasing process in compliance with applicable laws and regulations. The Heppner Group is committed to ensuring that its Suppliers are treated with fairness, respect and neutrality. This commitment is reflected in:

SUPPLIER SELECTION:

Suppliers are selected using a transparent, fair and impartial selection and purchasing process, based on predefined, objective criteria, including particularly the social and environmental impact of the proposed products and services, whenever possible. We use purchasing methods that encourage genuine competition between suppliers. We treat our suppliers with honesty and respect, and we give equal opportunities to all, in all stages of the purchasing process (panel building, short list, selection...). We undertake to apply a total costs and impacts principle with respect to the life cycle of products and services, and more particularly at our suppliers, in line with our decarbonization and energy transition programme.

FAIRNESS AND TRANSPARENCY

We abide by the fairness principle in our treatment of our Suppliers. During a call for tenders, we undertake to provide the same information, the same deadlines and assess the tenders according to the same criteria. Our relationships are grounded on principles of transparency and integrity. We uphold the confidentiality of the business and technical information provided by the Supplier.

ANTI-CORRUPTION

Any form of corruption in our dealings with our business and institutional partners and with the government is totally forbidden. Buyers are not authorised to receive any financial or in-kind gratuity that could impact on awarding the contract.

CONFLICTS OF INTEREST

Buyers or endorsers must act in the interests of the Heppner Group, without allowing their personal, family or friendship interests to interfere with their professional decisions, with the aim of preventing any risk of conflicts of interest.

RESPONSIBLE PURCHASING

The Heppner Group undertakes to put in place a responsible purchasing approach. This undertaking requires the Suppliers' cooperation and support in terms of the environmental and social quality of their quotes. The Heppner Group wishes to involve local players in its purchases, with the aim of fostering local economic development. The Heppner Group invites its Suppliers to highlight CSR actions as a competitive advantage in their quotes. The Heppner Group expects its partners to engage in completely transparent exchanges, as well as an approach based on progress on their part. The Heppner Group expects its Suppliers to cooperate fully in its Responsible Purchasing approach, in particular by participating in our annual evaluation campaigns.

REDUCING RISKS OF MUTUAL DEPENDENCE

The Heppner Group wishes to avoid any situation of economic dependence that could endanger the Group or any of its suppliers.

Accordingly, the Heppner Group invites its Suppliers to diversify their customers in order to avoid any significant economic dependence that could jeopardise either of the two parties.

CONTINUOUS IMPROVEMENT PROCESS

Aware of the need to continue developing both its social and environmental policy and that of its Supplier, Heppner works constantly to improve and identify desirable outcomes in terms of protecting the environment, upholding human rights and improving working conditions.

Accordingly, the Supplier and the Heppner Group will meet, at the initiative of either party, to share good practices in these areas and make the best solutions available for the benefit of all stakeholders.

Supplier commitments required by the Heppner Group

The Heppner Group requires its Suppliers to abide by the principles of the United Nations Global Compact, the International Bill of Human Rights and the Fundamental Conventions of the International Labour Organisation (ILO).

The Heppner Group reserves the right to cease all dealings with suppliers that do not comply with these requirements.

INTEGRITY / ETHICS / ANTI-CORRUPTION

The Supplier will conduct its business in accordance with the principles of loyalty, integrity and fairness.

The Heppner Group asks its Suppliers to take preventive measures to avoid any anti-competitive behaviour or practice.

The Heppner Group asks its Suppliers to uphold the confidentiality of the information received that is owned by the Heppner Group, to never use it for their own benefit and to guarantee respect for intellectual property rights.

The Supplier undertakes to uphold and have others uphold the principles of the Heppner Group's Code of Business Conduct.

FUNDAMENTAL RIGHTS AND COMBATING DISCRIMINATION

The Supplier's employment practices with respect to its employees shall comply with a minimum level of labour standards. Accordingly, the Supplier shall:

- Take all the necessary measures to ensure all of its employees' health and safety
- Refrain from engaging in human trafficking or participating in any transaction that could be considered as such
- Refrain from resorting to any form of forced or compulsory labour
- Refrain from resorting to child labour involving individuals under 15 years of age, or the minimum age under local legislation if higher
- Abide by the laws in force concerning salary and working hours. In particular, it guarantees compliance with the minimum wage, payment of overtime and maximum working hours
- Refrain from any form of discrimination and not make any distinction, especially on the grounds of origine, colour, religious belief, gender, sexual orientation, social status or physical or mental disability; except when local legislation requires it to

comply with the so-called "positive discrimination" rules, in which case the Supplier shall inform Heppner of the corresponding rules and how it complies with them

- Forbid all forms of physical or psychological violence
- Not tolerate any form of sexual harassment and put in place measures intended to support the victims of this type of harassment
- Assure employees' right to freedom of association
- Protect employees' personal data and use them without abuse
- Offer employees training and learning opportunities.

ENVIRONMENTAL PRACTICES

The Supplier shall abide by the legislation concerning protection of the environment and carry out its activities in an ecologically sound manner and, in particular, shall implement specific measures:

- Intended to control its consumption of water, energy, natural resources and other raw materials required for its business with a view to rationalising their consumption, reducing the volume of materials consumed while increasing their economic efficiency, and even increasing their rate of reuse and/or recycling
- Intended to reduce and/or process its atmospheric emissions, its discharges on the land and/or in the water, and any manner of waste produced by its activities. The Supplier undertakes to abide by the industry standards that apply to their activities, considering the products or services they provide for Heppner.

The Heppner Group invites its Suppliers to propose any initiative that favours local economic development.

Since October 2022, the Heppner Group has been committed to the Science-Based Target Initiative (SBTI) with CO₂e reduction targets, particularly those of its Scope 3 linked to subcontracting, to be met by 2030, 2040 and 2050. Heppner encourages its suppliers to commit to a decarbonisation policy and report on the actions undertaken. Regarding our transport suppliers: the Heppner Group has committed to an ambitious decarbonization and energy transition plan for all its activities: Road, Air and Sea. The Heppner Group invites all its transport subcontractors to initiate actions to decarbonize their own activities, to commit to voluntary CSR initiatives such as the Global Compact, Ecovadis, SBTi or CDP and to communicate on the actions taken. Suppliers undertake to comply with the Heppner Group's requirements in terms of energy transition.

DATA PROTECTION

The Heppner Group expects its suppliers to abide by data protection legislation, particularly EU Regulation 2016/679 of 27 April 2016 (GDPR), by assuring the

security of the personal data entrusted by the Heppner Group, reporting without delay any breach of such data and keeping up to date a record of processing activities, which shall be notified to the Heppner Group whenever the latter requests.

FOLLOW-UP AND CONTROL – DOCUMENTATION AND REPORTS

In order to prove compliance with the commitments made herein, the Supplier undertakes to furnish in writing to the Heppner Group, on first request and as soon as possible:

- All approvals, authorisations, certifications issued by an authorised person or authority
- All documents, policies, procedures or statements generated by its employees or auditors
- All environmental or social ratings, certifications or labels issued by a certifying body, rating agency, audit firm or similar
- All certificates and documents required under local law, in particular with regard to the fight against illegal labour and the employment of foreigners without a work permit.
- The answers to the assessment questionnaires sent to them by the Heppner Group, providing, where applicable, any supporting documents required as proof.

When legislation to which the Supplier is subject imposes higher standards or requirements than those set forth in this Charter, such legislation shall apply. Otherwise, the Charter shall prevail.

Signature

We hereby confirm:

- that we have received and fully understood the Heppner Group Responsible Purchasing Charter
- that we will forward a copy of this Charter to all our personnel involved in business relations with Heppner. Failing that, we will provide our personnel with sufficient information to implement the principles stipulated in this Charter in the language of the country in which they work.
- that we align with and undertake to abide by its principles; non-compliance thereof may be considered a breach in our obligations, which may result in, depending on its seriousness,
 - implementation of the necessary corrective measures within a defined time frame
 - prohibition, with immediate effect, from the use of any of the Heppner Group's brands or names, not even as a reference
 - termination of all or part of the business relationship.

Date: / /

Company name: .

Name of representative:

Post of representative:

Signature, company logo/stamp:

The Heppner Group reserves the right to cease to deal with Suppliers that do not abide by our Charter.

In the event of any practice contrary to this Responsible Purchasing Charter that contravenes human rights, respect for people or the environment, the Heppner Group reserves the right to alert: the HALDE (Higher Authority for Combating Discrimination), the CNIL (Data Protection Committee), ...

