



Sustainable Procurement Policy

1. TOUAX's commitments

The TOUAX Group conducts its business in accordance with human rights, social rights, environmental protection and best governance practices. It ensures that it operates in an exemplary, sustainable and ethical manner, consistent with its commitments to social and environmental responsibility.

As a signatory to the United Nations Global Compact, TOUAX bases its approach on compliance with the ten principles relating to human rights, international labour standards, the environment and the fight against corruption. Within this framework, the Group ensures that practices within its supply chain are consistent with its commitments and the values it upholds.

The Group's sustainable procurement policy reflects this ambition. It aims to balance economic performance and operational excellence with consideration of social, environmental, ethical and governance issues in procurement decisions and in the management of supplier relationships.

TOUAX attaches particular importance to establishing long-term relationships with suppliers who share its standards regarding ethics, transparency and accountability. In this context, the Group strives to develop a constructive dialogue with its suppliers, based on trust, mutual respect and a commitment to continuous improvement.

In its commitment to more sustainable transport, TOUAX is implementing a sustainable procurement approach centred on the following commitments:

1.1. General framework and implementation

- **Ensure the roll-out, management and ongoing evaluation of the sustainable procurement policy** across the entire Group, using key indicators to measure its implementation, effectiveness and continuous improvement.
- **Draw on the Human Rights Due Diligence process** established within the Group in April 2026, in order to identify, prevent, mitigate and, where necessary, remedy potential or actual risks and negative impacts relating to human rights and working conditions within the supply chain.

- **Gradually integrate an approach to identifying and assessing supplier risks** (ESG, climate, economic, dependency and business continuity risks) in order to prioritise the vigilance, monitoring and support measures to be implemented with the most critical suppliers. This involves segmenting suppliers across each of our business activities.
- **Provide regular training for the Group's procurement staff** on best practices in sustainability and sustainable procurement. Our aim is to ensure that training is done every two years, and that all new procurement staff receive training upon taking up their post.
- **Carry out regular internal audits of sustainable procurement procedures**, in particular the internal 'Onboard Sustainable Procurement' procedure, to verify the effective roll-out of the supplier framework across each business unit, particularly with regard to contract management, the CSR questionnaire, the supplier code of conduct, the Pareto analysis and monitoring indicators.

1.2. Environment

- **Reaffirm the Group's environmental ambition and support its long-term decarbonisation pathway.** Sustainable procurement plays a vital role in achieving this objective by helping to reduce greenhouse gas emissions across the entire value chain, supporting suppliers in their decarbonisation pathways, and developing more sustainable solutions for our customers.
- **Set a target for progress in supplier decarbonisation.** In this context, the Group has set itself the target that 50% of its strategic suppliers will have a formalised decarbonisation plan in place by 2030.
- **Incorporate environmental requirements into contractual relationships with suppliers**, in order to formalise the Group's expectations regarding the reduction of environmental and climate impacts. The objective is to ensure that 85% of supplier contracts include a signed environmental clause by 2028.
- **Strengthen the identification, assessment and management of environmental risks linked to the supply chain**, particularly in relation to carbon footprint, pressure on natural resources, pollution, waste management, material traceability, as well as taking into account circularity and end-of-life issues. TOUAX ensures that these issues are incorporated into its supplier assessments and, where necessary, into the definition of appropriate monitoring measures or improvement actions.

1.3. Social

- **Promote respect for human rights, social rights and international labour standards amongst suppliers**, and to ensure a high level of adherence to these principles within our supply chain. Our objective is for 85% of strategic suppliers to have received the Supplier Code of Conduct by 2028 and 100% by the end of 2030.
- **Strengthen the identification, assessment and prevention of social and human rights risks associated with the supply chain**, particularly in relation to working conditions, health and safety, respect for fundamental rights, discrimination and compliance with

applicable social standards. These issues are taken into account in supplier assessments, in conjunction with the human rights due diligence (HRDD) process implemented within the Group.

- **Carry out inspections and internal or external audits** to ensure compliance with sound social and ethical practices on the ground, in addition to environmental considerations. Our aim is to conduct at least one CSR audit per year on high-risk suppliers, starting in 2027.

1.4. Sovereignty and resilience

- **Strengthen the resilience of the supply chain and manage critical dependencies** by identifying where they exist risks of concentration, geographical vulnerabilities, dependencies on certain suppliers, and disruption risks that could affect the continuity of any of the Group's activities.
- **Incorporate these issues of dependency, criticality and supply continuity into the assessment of suppliers and sensitive procurement categories**, in order to prioritise the necessary security measures.
- Where relevant and compatible with requirements for quality, competitiveness and compliance, **encourage the diversification of supply sources and the securing of critical purchases**, in order to strengthen the long-term resilience of the value chain.
- All of this requires the Group to draw up a **comprehensive risk map** of its value chain, particularly with regard to suppliers. TOUAX, which has already begun work on this issue, aims to finalise this risk map by the end of 2027.

2. TOUAX's expectations of its suppliers

The Group expects its suppliers to share its standards regarding ethics, transparency and accountability. It encourages them to adopt a mindset of continuous improvement and to contribute, at their own level, to the sustainability of their entire value chain.

These expectations apply to all of the Group's suppliers, as well as to their parent companies, subsidiaries, affiliated entities, subcontractors and their own suppliers involved in the supply of goods, equipment or services to TOUAX.

In line with its own commitments, TOUAX's key priorities regarding its suppliers for the implementation of a responsible, sustainable and long-term procurement policy are centred on the following areas:

2.1. Ethics, compliance and governance

- **Adhere to the Group's Supplier Code of Conduct** and respect its principles in all their activities, including in their dealings with their own suppliers and subcontractors.
- **Put in place measures to prevent corruption, conflicts of interest and anti-competitive practices**, in accordance with applicable laws and international standards.
- **Respond to CSR questionnaires** sent by the Group and provide truthful, complete and verifiable information.
- **Report without delay any breach, incident or risk** likely to affect compliance with the commitments made, via the communication channels provided by TOUAX.
- **Agree, upon reasoned request, to on-site visits, audits or inspections** (internal or external) relating to compliance with contractual commitments and CSR standards.

2.2. Environment

- **Where feasible and appropriate, draw up a decarbonisation plan** with quantified targets and a timetable for implementation, consistent with their climate trajectory and, consequently, with the approach initiated by the Group.
- **Control or even reduce their consumption of natural resources** (water, energy, raw materials) and, where possible, prioritise recycled, recyclable or responsibly sourced materials.
- **Ensure responsible waste management** and, as far as possible, incorporate the **principles of the circular economy**, in particular eco-design, durability, reparability, reuse and recycling of the products, equipment or materials supplied.
- **Prevent pollution risks** associated with their activities and put in place appropriate control measures.
- **Where justified, incorporate environmental criteria into the selection of their subcontractors**, thereby contributing to a more sustainable value chain.

2.3. Social

- **Respect human rights and fundamental freedoms**, in accordance with international conventions and applicable local legislation.
- **Prohibit all forms of forced labour, child labour, human trafficking or discrimination**, both in their own operations and among their subcontractors.
- **Ensure decent working conditions**, particularly with regard to pay, working hours, the right to rest, and freedom of association and collective bargaining.
- **Promote respect for social dialogue**, freedom of association and social protection, in accordance with the applicable legislation in each country.

- **Ensure a safe and healthy working environment** by implementing measures to prevent occupational risks and protect the health of employees and, where applicable, subcontractor staff.
- **Cooperate with TOUAX as part of the Human Rights Due Diligence process**, in particular by providing the requested information and, where appropriate, participating in corrective action plans.

2.4. Sovereignty and resilience

- **Inform TOUAX of any event likely to affect the continuity of service provision**, whether financial, operational, geopolitical, climatic, logistical or regulatory in nature.
- **Ensure sufficient traceability of their own supply chain**, enabling the identification of downstream suppliers and any critical dependencies.
- **Implement risk management and business continuity arrangements** tailored to the nature and criticality of the services provided.
- **Collaborate with TOUAX to identify and mitigate the risks of disruption and failure along the value chain**, in a spirit of partnership and the development of sustainable solutions.

The TOUAX Group is committed to supporting its suppliers in the process, in a spirit of constructive dialogue, mutual trust and continuous improvement.

3. Scope and governance of our sustainable procurement policy

This sustainable procurement policy applies to all companies within the TOUAX Group. It also applies to all our suppliers, their parent companies, subsidiaries and affiliated entities, employees, as well as their subcontractors and suppliers.

This policy will be reviewed annually and amended where necessary.

Raphaël Walewski, Managing Partner, is responsible for the implementation and monitoring of this policy.

We are committed to a sustainable procurement policy and are determined to promote our CSR approach throughout our supply chain to contribute to more sustainable transport for our customers.

July 20th, 2026

The Managing Partners,

Fabrice WALEWSKI

Raphaël WALEWSKI



Touax®