



**YOUR OPERATIONAL LEASING SOLUTION FOR SUSTAINABLE TRANSPORT**

## **SUPPLIER CODE OF CONDUCT**

The TOUAX Group, hereinafter referred to as the "Group", adheres to the highest standards in the conduct of its business activities, and pays particular attention to respect for human rights, social rights and environmental protection. TOUAX has signed the United Nations Global Compact, an initiative whose 10 founding principles cover human rights, international labour standards, the environment and the fight against corruption.

As part of this sustainable development approach, the Group guarantees a high level of compliance by working with suppliers who are committed to its values.

In keeping with its commitments and principles of action, the Group expects each of its suppliers, their parent companies, subsidiaries and affiliates, employees - temporary or otherwise - as well as suppliers' subcontractors and suppliers, and any person having a business relationship with a TOUAX company, hereinafter referred to as the "Suppliers", to comply with the standards set forth in this "Supplier Code of Conduct" and to act ethically and responsibly.

It is the Supplier's responsibility to ensure that this Code is respected by all its own subcontractors, suppliers and partners involved in supplying the Group.

### **1. Compliance with international laws and regulations**

The Group's Suppliers undertake to comply without restriction with all applicable national laws and international treaties concerning human rights, social rights, labour rights in accordance with the International Labour Office and all legislation applicable to environmental protection.

### **2. Social responsibility**

#### **2.1. Respect for human rights**

The Group respects the Universal Declaration of Human Rights, supplemented in Europe by the Charter of Fundamental Rights of the European Union and the European Convention on Human Rights, and recognises all these rights for its stakeholders (employees, customers, etc.). It expects the same from its suppliers.

#### **2.2. Working conditions**

Suppliers must ensure compliance with the Fundamental Conventions of the International Labour Organisation and in particular:

- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87);
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98);
- Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol) ;
- Equal Remuneration Convention, 1951 (No. 100);
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111) ;

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- Abolition of Forced Labour Convention, 1957 (No. 105) ;
- Minimum Age Convention, 1973 (No. 138) ;
- Worst Forms of Child Labour Convention, 1999 (No. 182).

### 2.2.1. The elimination of forced and compulsory labour

The Group strongly condemns modern slavery in all its forms (withholding of identity papers, violence and threats, debt bondage, etc.) and expects the same approach from its Suppliers.

### 2.2.2. The elimination of child labour

Suppliers must be able to guarantee that child labour will not be used. The International Convention on the Rights of the Child defines a child as any person under the age of 18 years unless, under applicable law, majority is attained earlier. The Group considers a child to be anyone who has not yet reached compulsory school-leaving age or the minimum working age in the country where they live. In any event, Suppliers must ensure that all employees under the age of 18 do not perform work that could be dangerous or harmful to them (health, safety, morality of the child).

### 2.2.3. Personal safety and protection

Suppliers must guarantee their employees, in the same way as the Group, a safe and healthy working environment. Our Suppliers are encouraged to identify the risks associated with their activities and to take measures to prevent accidents and personal injury, in particular by distributing appropriate safety information, which must be passed on more widely in the event of dangerous situations. All employees of the Supplier have the right to benefit from a health and social protection system that complies with the local legislation in force.

### 2.2.4. Decent pay, rest and working conditions

The Suppliers must undertake to comply with the rules in force concerning the right to the payment of a regular salary, rest and legal benefits, rights conferred on all employees and in particular by respecting a maximum number of weekly working hours and respecting the weekly rest period. The Supplier's employee must be paid at least the minimum wage and benefit, where applicable, from remuneration for overtime worked in accordance with the laws and regulations. In general, the Group reaffirms that the well-being of employees must be taken into account by Suppliers, which implies decent employment conditions.

### 2.2.5. Promoting social dialogue

Suppliers shall ensure that freedom of expression, freedom of association and the right to collective bargaining are respected.

### 2.2.6. Combating discrimination and harassment and promoting equal opportunities

In accordance with the Universal Declaration of Human Rights and its ethical principles, the Group expects its Suppliers to offer their employees fair and equitable treatment that respects their opportunities for recognition and career development, regardless of their origins, gender, beliefs or disabilities, and not to tolerate any form of discrimination.

Suppliers must therefore pay particular attention to discrimination in terms of access to employment and career paths (access to training, promotion, breach of contract, retirement, etc.). This vigilance must cover all forms of discrimination (gender, ethnicity, etc.). The Supplier must encourage the integration of any person excluded from employment, particularly those with disabilities. In general, it must promote equal opportunities and diversity within its organisation and encourage the inclusion of all employees.

Any form of harassment, regardless of intent, whether direct or indirect, physical or verbal, is prohibited. The Group expects its Suppliers to ensure that all their employees can work in an environment where they are not at risk of harassment.

### 3. Accountability and integrity in the conduct of business

#### 3.1. Anticorruption

The Group firmly condemns corruption. This commitment is set out in the Anticorruption Code of Conduct, which is available on the Group website and includes whistle-blowing procedures. Suppliers must comply with all applicable laws and regulations. Suppliers that are not subject to such laws and regulations shall put in place processes appropriate to their size and risk in order to prevent any act of corruption in the course of their activities. Suppliers shall comply with all applicable laws, directives and regulations imposing obligations to combat corruption and influence peddling. In general, Suppliers comply with the highest standards of integrity in the conduct of business interactions. Suppliers must therefore deploy vigilance measures to detect risks in this area, in particular by monitoring the activities of third parties, verifying the identity of any interlocutor or recipient of funds, and locating bank accounts. They undertake not to make any offer, gift, promise or advantage to the Group's employees in order to obtain a favourable decision.

#### 3.2. Respect for the security and confidentiality of information

##### 3.2.1. Protection of personal data (GDPR)

Everyone has the right to the protection of their personal data. Personal data must be processed by Suppliers in accordance with the General Data Protection Regulation (GDPR) and all other relevant laws and regulations. In the event of an incident in the processing of the personal data entrusted to it, the Supplier undertakes to notify the Group at the following address: [rgpd.corporate@touax.com](mailto:rgpd.corporate@touax.com) as soon as it becomes aware of the incident and as quickly as possible in order to limit its repercussions.

##### 3.2.2. Managing sensitive information

Suppliers must not, under any circumstances, use any exclusive or confidential information that they have received in the course of their business relations with the Group, unless the Group has given its prior consent. Sensitive information includes, in particular, all intellectual property rights and privileged information. Suppliers may not use sensitive information to carry out transactions in the Group's listed securities, either directly or through a third party, or to guide the negotiation of contracts with third parties.

##### 3.2.3. Data security

The Supplier must deploy a secure IT system to prevent digital attacks or possible data leaks. If the Group grants access to its IT system, the Supplier must comply with the IT Charter issued by the Group. In all cases, the Supplier must comply with any security requirements that may be issued by the Group.

#### 3.3. Respect for sound governance and fair competition

The Group expects its Suppliers to have a system of governance that complies with the regulations and legislation in force.

##### 3.3.1. Respect for competitive practices

Suppliers undertake to compete in a fair and healthy manner on the market, respecting the laws and regulations relating to competition law. They must refrain from taking part in any anticompetitive practice whatsoever (illegal agreement in particular on prices or market allocation, abuse of dominant position, etc.).

##### 3.3.2. Compliance with economic sanctions

Suppliers undertake to comply with and follow regulations relating to economic sanctions, including controls on exports, imports, embargoes and other restrictions (taxes, quotas, credit freezes, etc.). As

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part of the business relationship, Suppliers must guarantee that they will declare any sanctions to which they are or may be subject.

In particular, Suppliers undertake to comply with the international sanctions imposed by the European Union, the United Nations and the USA, and the control of certain raw materials (such as tantalum, tin and tungsten).

### 3.3.3. Conflicts of interest

Suppliers undertake to declare any conflict of interest or any situation resembling a conflict of interest of which they are or may become aware.

### 3.3.4. Money laundering

In practice, acts of corruption and influence peddling often take the form of money laundering and the use of forgeries. Suppliers must not participate in, facilitate or support money laundering.

## 3.4. Establishing a sustainable and balanced relationship with Suppliers

The Group wants its relationships with Suppliers to form part of a sustainable value chain that promotes a balanced relationship. The Group is committed to contributing to the development of the regions in which it operates, and hopes that its suppliers will do likewise. To this end, they must:

- create a network of relationships that will contribute to their development, while ensuring the smooth running of exchanges with local stakeholders and the local impact of their activities;
- seek to develop economic activity close to their area of influence.

## 4. Environmental responsibility

The Group seeks to reduce its environmental impact. As part of improving its environmental performance, the Group expects Suppliers to integrate environmental issues into their activities in order to offer the Group environmentally-friendly products and services. Suppliers must ensure that their practices enable:

- Sustainable, rational use of energy and natural resources (water, raw materials, etc.);
- Promoting sustainability by striving to continually improve their products and services to make them more environmentally friendly;
- Implementing production and logistics processes that reduce their production of greenhouse gases. The Group's Suppliers undertake to measure, where applicable, their atmospheric emissions of greenhouse gases, volatile organic compounds, aerosols, corrosive products, particles and any chemical product that depletes the ozone layer. Suppliers undertake to implement an action plan aimed at reducing these polluting emissions, their water and energy consumption, to treat and/or reduce any chemical and other materials presenting a risk to the environment and to reduce and/or recycle their solid and/or liquid waste.

## 5. Supplier membership

Suppliers acknowledge that they have read this Code and undertake to support the Group in the development of its CSR strategy by mobilising the necessary resources to comply with its content. Suppliers agree to be assessed by the Group with regard to their compliance with this Code.