

# LAGARDÈRE GROUP RESPONSIBLE SUPPLIER CHARTER

# PREAMBLE

In the conduct of its activities, the Company undertakes to respect and apply all treaties, laws, regulations and other sectoral standards applicable to it and, where necessary, the principles of this Charter as mentioned in the Lagardère Group's 2020 Code of Ethics.

In line with its adherence to the United Nations Global Compact, the Lagardère Group establishes and maintains business relationships with partners who conduct their activities in a way that contributes to the objective of sustainable development, in social, environmental and economic terms. Consequently, the Lagardère Group expects its suppliers, partners and service providers, as well as their subcontractors, to respect the fundamental principles set out in this charter (hereinafter, the "**Charter**").

The supplier, partner, service provider or subcontractor (hereinafter, the "**Supplier**") accepts the Charter unreservedly and undertakes vis-à-vis the subsidiary of the Lagardère Group (hereinafter, the "**Company**") to comply with its terms, and vouches for their compliance by its own employees and representatives.

The Supplier also undertakes to comply with the treaties, laws, regulations and other industry standards that are binding on it (each a "**Standard**" and collectively the "**Standards**"). In this respect, if a Standard imposes an obligation on the Supplier that is more demanding than that provided for in the Charter in this respect, the Supplier shall be contractually bound to comply with this Standard.

The Supplier accepts that the Company may carry out audits in order to verify the application of the principles of this Charter.

Any failure by the Supplier to comply with the principles set out in this Charter may be considered a serious breach of its contractual obligations. As such, the Supplier shall adopt a plan of corrective measures which it shall submit to the Company in order to improve the situation and bring itself into compliance. In the event of a serious, persistent or repeated breach, the Company has the right to terminate the commercial relationship, without compensation for the Supplier, if the fact of maintaining this relationship would be such as to incur the liability of the Company or of a company in the Lagardère Group for failure to comply with a Standard.

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# 01 SOCIAL VALUES

The Supplier undertakes to treat employees with respect and dignity, and to comply with the applicable standards in the field of employment and professional relations. In particular, the Supplier undertakes to:

## 1. CHILD AND ADOLESCENT LABOUR

- Not to employ people under the minimum legal working age and/or the age of completion of compulsory education as set out in the Standards applicable in the jurisdiction concerned.
- In any case, do not employ people under the age of 15 or 18 for dangerous work<sup>1</sup>.

## 2. FORCED OR COMPULSORY LABOUR, VIOLENCE

- Not to use any form of forced or compulsory labour<sup>2</sup>, slavery or any similar practice, as well as any violence (verbal, physical or moral), corporal punishment or threat of such punishment.

## 3. WORKING HOURS, LEAVE AND PROFESSIONAL TRAINING

- Comply with the Standards relating to the limitation of the number of working hours.
- Grant a minimum of consecutive hours of rest to each employee in accordance with the applicable Standards.
- Not regularly make its employees work more than the maximum number of hours per week in accordance with the applicable Standards.
- Grant a minimum number of days of maternity leave and/or sick leave in accordance with the applicable Standards and make its best efforts to ensure that the employee returns to his or her job - or an equivalent job - upon returning from such leave.

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<sup>1</sup> Work which, by its nature or the conditions in which it is carried out, is likely to compromise the health, safety or morals of children and adolescents.

<sup>2</sup> Any work or service required of an individual under threat of any penalty and for which the said individual has not offered himself voluntarily.

- Ensure that its employees have access to professional training, where appropriate in accordance with the applicable Standards.

#### **4. UNDECLARED WORK**

- Refrain from engaging in undeclared work, in particular by fulfilling all its obligations in terms of declarations to the administrative, social and tax authorities as provided for in the country concerned.

#### **5. SALARIES**

- Adopt remuneration policies that comply with the applicable minimum wage and overtime pay standards.

#### **6. EQUAL TREATMENT AND EQUAL OPPORTUNITIES**

- To treat all employees and potential recruits equally and fairly and not to discriminate in any way, shape or form in respect of employment, occupation, recruitment or remuneration on the grounds of age, origin (national, social or ethnic), gender, gender identity, sexual orientation, religion, political opinion, marital status, disability or any other category protected by the applicable Standards.
- Do not subject employees and potential recruits to compulsory health tests that are not required by the applicable Standards.

#### **7. HEALTH AND SAFETY**

- To take the necessary measures to ensure a safe, secure and hygienic working environment for its employees and subcontractors and to preserve their physical integrity. To this end, in particular :
  - (i) To comply with the applicable Standards relating to health, safety and security at work and, in particular, to ensure that buildings, workplaces, machinery, equipment and work processes comply with the applicable Standards relating to maintenance, hygiene and safety;
  - (ii) Implement procedures and systems to prevent, manage and monitor accidents at work and occupational illnesses.

## 8. SOCIAL RELATIONSHIPS

- Respect the applicable Standards concerning the right of employees to form and/or join trade unions and/or representative organisations of their choice and respect the applicable rights of employees to mandate such unions/organisations to represent them in collective bargaining.

## 9. CERTIFICATIONS AND STANDARDS

- The Company encourages the Supplier to enroll in a social certification process, in particular by referring to the requirements of the following certifications or standards:
  - o SA 8000 (social certification) ;
  - o OHSAS 18001 (certification relating to working conditions, health and safety) ;
  - o ILO-OSH 2001 (Occupational Health and Safety Management System).

# 02 ENVIRONMENTAL VALUES

With regard to environmental protection, the preservation of natural resources and the fight against climate change, both in the context of activities carried out with the Company and in the rest of its activities, the Supplier endeavors to implement policies that limit the environmental impact throughout the life cycle of the products or services it markets.

It undertakes to comply with the applicable Standards in terms of environmental protection, public health and safety and the traceability of raw materials, materials and components required for the supply of goods or services.

The Supplier also undertakes to comply with Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the placing on the market in the European Union and the export from the European Union of certain commodities and products associated with deforestation and forest degradation. As of the date of this Charter, this applies to seven commodities (cattle, cocoa, coffee, oil palm, rubber, soya and wood) and associated products containing these commodities, the full list of which is given in Annex 1 of the said Regulation. Within this framework, it undertakes in particular to set up and keep up to date a due diligence system, which must be a framework of procedures and measures intended to guarantee that derived products placed on the European Union market or exported from the European Union market are "zero deforestation" and comply with the applicable legislation and regulations.

In addition, the Supplier seeks, in the following areas, to :

## 1. LIMITING GREENHOUSE GASES

- Reduce its emissions of greenhouse gases, pollutants and volatile organic compounds and develop a low-carbon strategy with targets in line with international standards.

## 2. ENERGY EFFICIENCY AND RENEWABLE ENERGIES

- Developing an energy efficiency policy to optimise energy consumption in the development of its products and services.
- Favouring the use of renewable energies in the energy supply strategy with a view to limiting the use of fossil fuels as much as possible.

### 3. USE OF NATURAL RESOURCES AND RAW MATERIALS, WASTE, CIRCULAR ECONOMY AND LOCAL ECONOMY

- Use natural resources efficiently and take into account, as far as possible, the entire life cycle of the product or service at the design stage (reduce packaging and over-packaging, use eco-labelled products, encourage eco-design, reuse, re-employment, take into account the recyclability of finished products, etc.), with a view to the circular economy (usability, reusability, reparability, dismantling, remanufacturing or refurbishment, recycling, recirculation according to the biological cycle, other forms of optimisation, etc.), within a circular economy logic (usability, reusability, reparability, disassembly, remanufacturing or refurbishment, recycling, recirculation according to the biological cycle, other forms of optimisation) and in accordance with the EU action plan for a circular economy and applicable standards such as the PPWR (Proposal Packaging and Packaging Waste regulation).
- Whenever possible, give priority to local production and short distribution channels.
- Reduce waste production as much as possible and sort it. Separate hazardous waste from non-hazardous waste as far as possible, store it in appropriate conditions and ensure that it is treated in accordance with the applicable Standards.

### 4. PRESERVING BIODIVERSITY

- Integrate the notion of pressures on biodiversity and ecosystems as part of its activities.

### 5. WATER

- Limit water consumption as much as possible.
- Treat wastewater before discharging it into the natural environment or have it treated in authorised treatment plants, in accordance with the applicable Standards, where applicable.

### 6. DISCHARGES OF TOXIC OR HAZARDOUS PRODUCTS

- Do not use dangerous or toxic products that contravene the applicable Standards, or release polluting or contaminating substances into the environment.
- Identify, register and manage chemical and hazardous substances appropriately, in accordance with applicable Standards and using an approach that ensures the safe handling, transport, storage, use, recycling, reuse and disposal of these hazardous products.



## 7. RISKY SUBSTANCES : COMMUNICATION AND LABELLING

- Not to deliver any product to the Company and/or, where applicable, to Lagardère Group subsidiaries containing radioactive, PBT (Persistent, Bioaccumulative, Toxic), vPvB (very Persistent, very Bioaccumulative), CMR (Carcinogenic, Mutagenic or toxic for Reproduction) or SVHC (Substances of Very High Concern) substances, preparations or mixtures.
- Comply with the Hazardous Substance Notification Standards (e.g. tobacco, alcohol, air fresheners, glue, etc.).

## 8. CERTIFICATIONS AND STANDARDS

- The Company encourages the Supplier to enroll in an environmental certification process, in particular by referring to the requirements of the following certifications or standards:
  - ISO 14001 ;
  - EMAS.

# 03 BUSINESS ETHICS

The Supplier shall maintain ethical and responsible behaviour in the conduct of its business. In particular, it complies with the following principles:

## 1. COMBATING BREACHES OF BUSINESS INTEGRITY

The Company has adopted a zero-tolerance policy on corruption, rejecting any form of breach of business integrity: active or passive corruption, in the public and private sectors, illegal acquisition of interests and influence peddling (the "**Breaches of Business Integrity**").

The Supplier therefore declares and guarantees, throughout the duration of its relationship with the Company:

- (i) To comply with the applicable anti-corruption, anti-money laundering and counter-terrorism standards applicable to the performance of its relationship with the Company, as well as those governing its activities in the countries where it conducts business;
- (ii) To put in place proportionate and appropriate measures to combat and prevent Breaches of Business Integrity;
- (iii) That neither he, nor his executives, nor his employees in the context of their duties or any person acting in his name and/or on his behalf, have been convicted of Breach of Business Integrity, or involve the Company or a company in the Lagardère Group or any of its employees in an activity, practice or conduct that could constitute a Breach of Business Integrity;
- (iv) To ensure that neither it, nor its executives, employees within the scope of their duties, or any person acting in its name and/or on its behalf, promises, offers or grants to a public official<sup>3</sup> or to any person, directly or indirectly, any payment, gift or other undue advantage which : (i) contravenes any applicable Standard; (ii) was intended to induce that person, in breach of his duties, to perform or refrain from

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<sup>3</sup>Within the meaning of Article 2 a) of the United Nations Convention against Corruption of 14 December 2005: "(i) any person who holds a legislative, executive, administrative or judicial office of a State Party, whether appointed or elected, whether permanent or temporary, whether paid or unpaid, and whatever his or her level in the hierarchy; (ii) any other person who performs a public function, including for a public agency or public enterprise, or provides a public service, as those terms are defined in the domestic law of the State Party and applied in the relevant branch of the law of that State Party; (iii) any other person defined as a "public official" in the domestic law of a State Party. However, for the purposes of certain specific measures provided for in Chapter II of this Convention, 'public official' may mean any person who performs a public function or provides a public service as those terms are defined in the domestic law of the State Party and applied in the relevant area of the law of that State.

performing any act within the scope of his functions; (iii) constitutes a facilitation payment (iv) constitutes a Breach of Business Integrity;

- (v) To implement a compliance program, including internal rules designed to detect and prevent Breaches of Business Integrity and to sanction employees who fail to do so;
- (vi) To implement an awareness and training campaign for its employees and stakeholders at risk;
- (vii) To implement a third-party due diligence procedure;
- (viii) That it maintains accurate accounts, as well as a control system to remedy breaches of the anti-corruption Standards.

The Supplier must respect these principles and must ensure that its subcontractors and suppliers also respect them.

The Supplier shall, to the extent possible, inform the Company if it becomes aware of the opening of an investigation by a competent authority or court having jurisdiction on anti-corruption matters against the Supplier or one of its executives, employees or a person acting in its name and/or on its behalf.

## 2. COMPLIANCE WITH INTERNATIONAL ECONOMIC SANCTIONS

The Supplier :

- (i) Undertakes to comply with the applicable International Trade Standards, including export controls, embargoes and sanctions against countries, companies or individuals (hereinafter the "**International Economic Sanctions**").
- (ii) Undertakes to provide the Company with all information relating to applicable export regulations and will issue all necessary classification certificates on request.
- (iii) Declares and warrants that neither it nor any of its executives or employees is on any applicable sanctions list, in particular those drawn up by the US government (in particular by the OFAC), by the European Union or by the Member States of the European Union (each a "**List of Person under Sanctions**", collectively the "**Lists of Persons under Sanctions**").
- (iv) Commits to notify the Company immediately if he or any of its executives or employees is named on a List of Persons under Sanctions.

In the event that, in the performance of the contract, the Supplier has not complied with the International Economic Sanctions, the Company shall be entitled to, as soon as it becomes aware of such non-compliance, suspend payments due to the Supplier until it has been demonstrated that there has been no such non-compliance.

If this breach is proven or if the Supplier is included on a List of Persons under Sanctions, the Company may terminate the contract by simple written notification, for fault on the part of the Supplier and with immediate

effect, without prejudice to any other rights and remedies that the Company or Lagardère Group may be entitled to exercise.

### 3. ETHICS LINE ALERT SYSTEM

As part of its ethics and risk prevention approach, the Lagardère Group has set up the Ethics Line secure reporting system: <http://ethicsline.lagardere.com>.

This multilingual platform, operated by an external service provider, is accessible 24/7. It provides a confidential means of reporting unlawful or unethical activities or behaviour carried out within the framework of the activities of the Lagardère Group and its subsidiaries. The Ethics Line platform is open to all stakeholders of the Lagardère Group and its subsidiaries - employees and third parties.

The Lagardère Group's whistleblowing procedure, which can be accessed from the Ethics Line website, describes in detail the procedures for submitting a whistleblower's report, the processing of reports received and the guarantees offered to users of the platform.

The Supplier declares that it is aware of the Ethics Line system and the Company encourages the Supplier to inform its employees involved in its relationship with the Company of this system.

### 4. CONFLICT OF INTEREST

The Supplier declares and guarantees throughout the duration of its relationship with the Company :

- (i) Having verified that neither he, nor its legal representatives, nor the persons involved in the performance of the contractual obligations, are in a situation of conflict of interest.
- (ii) That it will inform the Company without delay of any conflict of interest that may arise during the contractual relationship and concerning one of the parties identified in the previous paragraph.

If a conflict of interest is identified by the Supplier or the Company in the course of their relationship, they will agree together, on a case-by-case basis, on any measures to be taken to manage and/or resolve the situation.

### 5. COMPLIANCE WITH COMPETITION LAW

The Supplier must comply strictly with the applicable Standards on fair trading practices and more generally with competition law, applicable in the countries in which they carry out their activities.

The Supplier shall not exchange or disclose commercially sensitive information concerning competitors, customers or suppliers.

# 04 REDUCING THE RISK OF ECONOMIC DEPENDENCE

The Supplier undertakes:

- To avoid voluntarily remaining in a situation of economic dependence on the Company.
- To control its subcontractors, service providers and suppliers in order to avoid significant economic dependence.
- To inform the Company if it finds itself in a situation of economic dependence and submit an action plan to overcome this dependence (diversification, internationalisation, etc.).

# 05 EVALUATION OF CORPORATE SOCIAL RESPONSABILITY (CSR) PERFORMANCE

The Company encourages the Supplier to take part in a CSR performance evaluation process and recommends that it refer to existing rating tools, in particular EcoVadis.

As such, the Supplier acknowledges that the Company may take the said evaluation into account when choosing its suppliers or subsequently as part of an annual evaluation campaign.