ETHICAL AND RESPONSIBLE PURCHASING CHARTER

LEYTON GROUP



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# Introduction

This Charter is intended for suppliers, subcontractors and service providers, hereinafter referred to individually or collectively as the "Company(ies)", of companies under French or foreign law which THESEE (RCS Nanterre 491 828 554) directly or indirectly controls within the meaning of the provisions of Article L.233-3 of the French Commercial Code, hereinafter referred to individually or collectively as "LEYTON". This Charter, which sets out the principles of the internal responsible purchasing policy of LEYTON Group companies, is directly inspired by the fundamental principles of the International Labour Organisation Convention, the Declaration of Human Rights, the ISO 26000 standard and the United Nations Global Compact, to which LEYTON is a signatory. These fundamental principles aim to take into account the environmental, social and ethical performance of products and services acquired throughout their life cycle. The Company undertakes, by signing this Charter, to take into account the principles of the Charter and to collaborate with LEYTON to implement it and apply if necessary any appropriate corrective measures. LEYTON reserves the right to assess the Company's full compliance with this Charter by means of a CSR questionnaire and/or an audit within the Company, during which the latter may be required to provide information and documents relating to the commitments made with regard to this Charter. The Company also undertakes to implement the reasonable due diligence measures provided for in the Act of 27 March 2017 on the duty of care of parent companies and ordering companies and under the European Corporate Sustainability Due Diligence Directive to be applied from 2024.

# Principles

Under this Charter, the Company undertakes to respect the following fundamental principles:

**Gouvernance**

* Respect of the international regulations, national et local
* A relationship based on transparency in the exchange of information on sustainable development policy.

**Human Rights**

* Respect for the Universal Declaration of Human Rights and the United Nations Convention on the Rights of the Child
* Absence of child and/or forced labour
* Compliance with current legislation on working hours, pay, training, trade union rights, health and safety
* Reasonable vigilance measures to identify risks and prevent serious violations of human rights and fundamental freedoms, health, personal safety and the environment

**Conditions and relations at work**

* Absence of discrimination in recruitment, personnel management and harassment
* Respect for human dignity through acceptable working conditions
* Remuneration of employees at or above the minimum wage in force in the countries where the Company operates
* Prohibition on undeclared or illegal work
* Freedom of association and right of collective representation
* A system for listening to employees and promoting their well-being
* Protection of the health and safety of the employees
* Respect of hygiene rules as well as the applicable security at the place of work

**Environment**

* Compliance with French legislation or any applicable local regulations on Environmental Protection
* Adherence to environmental protection principles, i.e. the principles of precaution, reducing pollution (water, air, noise), reducing greenhouse gas emissions, limiting consumption of resources and energy, and protecting biodiversity
* Introduction of incentives to reduce pollution (water, air, noise)
* Implementation of measures to reduce greenhouse gas emissions
* Limiting consumption of resources and energy
* Measures to protect biodiversity

**Fair practices**

* Compliance with all applicable national and international anti-corruption regulations, in particular the Sapin II law
* If you suspect an act that could be assimilated to corruption or a conflict of interest, send an e-mail to: dispositif-alerte@leyton.com
* Disclose any personal or financial interests or other links with a LEYTON employee by sending an e-mail to: dispositif-alerte@leyton.com
* Respect for the intellectual property rights and know-how of LEYTON and its customers, in accordance with legal and/or contractual provisions.
* Fair and honest competition and rejection of all illegal or unfair practices

**Questions relative to clients**

* Respect for the confidentiality and protection of the personal data of all its stakeholders (consent, access, right to be forgotten, portability)
* Protecting the information system by implementing appropriate security practices

**Communities and local development**

Payment of the correct amount of national taxes and local contributions to which the Company is subject;

* Compliance of its own suppliers and subcontractors with the requirements set out in this Charter;
* Promoting local economic development and the diversity of subcontractors and suppliers;
* Facilitating the professional integration of people facing difficulties in accessing employment, particularly people with disabilities and under-represented social groups.

# Company self-assessment

By signing this Charter, the Company undertakes to complete the following self-assessment questionnaire and to send it, duly completed and signed, by email to rse@leyton.com .

1. Does the company fully comply with the laws and regulations in force in the countries in which it operates? [ ]  Yes [ ]  No
2. Has the company put in place a management system for:
* Quality? [ ]  Yes [ ]  No
* Environment? [ ]  Yes [ ]  No
* Social Responsibility? [ ]  Yes [ ]  No

*(If yes, thank you for attaching a copy of the necessary documents)*

1. Has the company been evaluated by a third party in terms of:
* Quality? [ ]  Yes [ ]  No
* Environment? [ ]  Yes [ ]  No
* Social Responsibility? [ ]  Yes [ ]  No

*(If yes, thank you for attaching a copy of the necessary documents, evaluation reports or certificates of evaluation)*

1. Has the company defined a code of ethics? [ ]  Yes [ ]  No

*(If yes, please attach a diital version of the code of ethics)*

1. Has the company defined a policy for:
* Hygiene, Health and Environment ? [ ]  Yes [ ]  No
* Responsible purchasing? [ ]  Yes [ ]  No
* Diversity and inclusion ? [ ]  Yes [ ]  No

*(If yes, thank you for attaching a document including an example of the policies put in place)*

Company Name: Click here to insert text

Name and capacity of signatory duly authorized for the purposes hereof: Click here to insert text

Signed by: Click here to insert text, the : Click here to insert text.

Company Stamp: Signature: