



SUPPLIERS CODE OF CONDUCT

Version of 17 April 2024

Introduction

LACROIX vision and strategy for positive impact

We believe that technology should be useful and eco-designed.

We do not believe that the solution to the ecological crisis is purely technological, but we are convinced that technology is essential to meeting environmental and societal challenges.

In a world where energy and resources are increasingly scarce and precious, the technologies we retain and develop must demonstrate both their usefulness and their sobriety.

To meet these challenges and contribute to the ecological transition, LACROIX has defined a **Positive impact Strategy** comprising 4 major commitments and 11 priorities:



LACROIX Responsible Purchasing policy

Our Responsible Purchasing Policy aims to define the ambition, objectives and resources that will enable us to give substance to the 3rd priority of our 3rd commitment: "Improve practices in our supply chain".

It demonstrates our determination to integrate the principles of sustainable development into all our business activities and to promote them in our relations with our partners and constitutes a common reference framework for our purchasing teams and our suppliers.

Our Responsible Purchasing Policy has 3 major objectives:

- Contribute to the overall performance of LACROIX by creating sustainable value and ensuring the availability of our products and services at the best total cost.
- Build balanced relationships with our suppliers and contribute to the creation of ethical and responsible supply chains.
- Improve the environmental and social performance of our suppliers, in particular by helping them to reduce their carbon footprint, develop eco-designed solutions and improve working conditions for their employees.

Find out more about our [Responsible Purchasing policy](#)

Purpose and scope

The purpose of this document is to define LACROIX's commitments and requirements towards its suppliers with regard to environmental, social and governance issues.

It applies to all suppliers of goods and services who work with the various entities of the LACROIX Group.

LACROIX also expects its suppliers to apply the requirements of this Code of Conduct to their own suppliers and subcontractors.

References

This Code of Conduct is based on version 8.0 (2024) of the Responsible Business Alliance Code of Conduct and refers to several international standards such as the International Labour Organisation (ILO) Conventions, the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

1. Human rights and working conditions

LACROIX and its suppliers are committed to respecting human rights, treating workers with dignity and respect and guaranteeing them decent working conditions as defined by the ILO and the United Nations Global Compact (UNGC). This commitment applies to all workers: employees, temporary workers, students, subcontractors or any other type of worker.

Child labour

Child labour in any form is strictly prohibited, with the term "child" referring to any person under the age of 15 or under the legal minimum age as defined by the applicable local legislation, whichever is higher.

Workers under the age of 18 (young workers) must not carry out any work likely to endanger their health or safety, in particular night work and overtime.

Forced labour

Suppliers undertake under no circumstances to use forced or compulsory labour as defined in ILO Fundamental Conventions 29 and 105, i.e., "any work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily".

The retention of identity papers, passports, training certificates, work permits or any other identification document as a condition of employment is prohibited, as is the obligation for workers to provide deposits or financial guarantees.

Workers must be free to leave their jobs with reasonable notice, without penalty or obstruction.

Illegal employment

Suppliers undertake to employ all persons within a legal framework authorised in the worker's country of residence and in the country in which the activity is carried out, in particular by means of a written employment contract signed by the worker, or a contract signed with any authorised company providing personnel.

Suppliers undertake to ensure that all their employees are duly declared to the official public bodies of the countries concerned and that all contributions and taxes enabling minimum social protection for employees are duly paid.

Suppliers undertake not to use any foreign workforce that does not have a regular work permit.

Working time

Working hours must not exceed the maximum set by the applicable local legislation. In addition, the working week must not exceed 60 hours, including overtime, except in emergencies or unusual situations. All overtime must be voluntary.

Workers must have at least one day off each week.

Wages

All workers must be paid at least the legal national or local reference minimum wage and be entitled to statutory benefits. In the absence of a legal minimum wage, workers' remuneration must meet their basic needs and those of their directly dependent family members.

Suppliers undertake not to make any deduction from remuneration for disciplinary reasons or for any other reason not provided for by the regulations in force, without the formal agreement of the worker.

Humane treatment and non-discrimination

The dignity, privacy and personal rights of each individual must be respected. The physical and moral integrity of employees must be preserved in all circumstances. Employees must not be subjected to corporal punishment or physical, sexual, psychological or verbal harassment.

No employee shall be treated unfairly on the grounds of gender, age, skin colour, ethnic origin, sexual orientation, disability, physical appearance, surname, religious beliefs or ideology. Suppliers undertake to promote equal opportunities and equal treatment and to combat all forms of discrimination in recruitment, as well as in promotion, career development, the determination of remuneration and the allocation of training programmes.

Freedom of association

Suppliers undertake to respect freedom of association and the right to organise and bargain collectively as defined in ILO Fundamental Conventions 87 and 98.

Workers and/or their representatives must be able to communicate openly and share their ideas and concerns with management regarding working conditions and management practices, without fear of discrimination, retaliation, intimidation or harassment.

In accordance with these principles, suppliers undertake to respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to assemble peacefully, and the right of workers to refrain from such activities.

2. Health and safety

The health, safety and welfare of workers are essential to LACROIX. Suppliers must provide and maintain a safe working environment and incorporate good health and safety management practices into their operations. Recognised management systems such as ISO 45001 and the ILO Occupational Safety and Health Guidelines can be used as a reference.

Risk prevention

The potential for worker exposure to health and safety risks (chemicals, electricity and other energy sources, fire, vehicles, fall hazards, etc.) must be identified, assessed, and mitigated using the hierarchy of control measures.

Where risks cannot be adequately controlled by these means, workers must be provided with appropriate and well-maintained personal protective equipment and information on the risks they face as a result of these risks.

Work-related accidents and illnesses

Procedures and systems must be in place to prevent, report, manage and monitor occupational accidents and diseases. In particular, steps should be taken to improve the recording of accidents and illnesses, to investigate them and to implement corrective measures.

Potential emergency situations and events must be identified and assessed, and their impact minimised through the implementation of emergency plans and response procedures.

Sanitation, food and housing

Workers must have easy access to clean toilets, sanitary facilities and drinking water for the preparation, storage, and consumption of food.

Workers' dormitories provided by suppliers must be kept clean and safe, with adequate emergency evacuation, hot water for cooking and hygiene, an emergency system, adequate lighting, and ventilation.

Communication and training

Suppliers shall make available to workers appropriate occupational health and safety information and training, in the worker's own language or in a language the worker can understand, for all identified hazards to which workers are exposed in the workplace, including, but not limited to, mechanical, electrical, chemical, fire and physical hazards.

Health and safety information shall be clearly displayed in the establishment or placed in a location identifiable and accessible to workers. Health and safety training must be given to all workers before they start work and regularly thereafter.

Workers are encouraged to raise health and safety concerns without reprisal.

3. Environment

LACROIX is committed to conducting its operations in such a way as to reduce its environmental footprint. Suppliers must put in place an appropriate organisation and management system, procedures, and training to assess and reduce as far as possible the environmental risks and impacts associated with their activities.

Regulations and environmental management system

Suppliers undertake to comply with applicable international and national environmental laws, regulations, and standards. All required environmental permits (e.g., discharge monitoring), approvals and records must be obtained, maintained and kept up to date, and their operational reporting requirements met.

In addition, suppliers are expected to implement and maintain an environmental management system based on ISO 14001 at all their manufacturing sites to minimise environmental impacts and risks.

Environmental risks, pollution and hazardous materials

Suppliers must implement appropriate management systems to identify, manage and reduce the environmental and pollution risks associated with their activities, including those related to air emissions, effluent discharges to water or land, waste disposal and the use of hazardous substances.

Chemicals, waste and other materials presenting a risk to man, or the environment must be identified, labelled and managed in such a way as to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Data relating to hazardous waste must be tracked and documented.

Suppliers undertake to comply with the bans/restrictions on substances and materials that are particularly harmful to the environment imposed by the various regulations as well as by LACROIX. The processes in place at suppliers must enable them to keep a regulatory watch in the field, to ensure that their products do not contain materials with restricted or prohibited use, and to inform LACROIX without delay in the event of imposed or voluntary changes concerning the composition or manufacture of the products delivered which may involve such materials or substances.

Energy and greenhouse gas emissions

Suppliers must quantify their greenhouse gas emissions on scopes 1, 2 and 3 using a recognised methodology (GHG Protocol or equivalent) and adopt emission reduction targets compatible with the global objective of limiting global warming to 1.5 degrees Celsius.

Suppliers must take steps to meet these targets and encourage their own supply chain to adopt a similar approach.

Suppliers must also minimise their energy consumption, improve the energy efficiency of their facilities and develop their supply of decarbonised energy. Energy data must be tracked and documented.

Use of resources and waste management

The use of natural resources, in particular fossil fuels, metals and minerals, plastics, water and forestry products, must be reduced as much as possible through practices such as modifying production processes, substituting materials, reusing, conserving or recycling.

Suppliers must implement a systematic approach to identifying, managing, reducing and recovering as much as possible (reuse and recycling must be favoured) the waste generated by their activity. Waste data must be tracked and documented.

Water

Suppliers must implement a water management programme that documents, characterises and monitors the sources, use and discharge of water, seeks opportunities to save water and controls contamination pathways.

All wastewater must be characterised, monitored, controlled and treated in accordance with applicable laws and regulations before being discharged or disposed of.

4. Business ethics and governance

Compliance with business ethics and governance principles is crucial to ensure the sustainability of our business and to maintain strong relationships with our suppliers. By adhering to these principles, LACROIX and its suppliers strengthen stakeholder trust, reduce operational risks and promote a responsible and sustainable supply chain.

Bribery, invitations and gifts, conflicts of interest

Suppliers undertake not to tolerate corruption and to strictly apply the United Nations and OECD anti-corruption conventions, as well as the anti-corruption laws and regulations in force in the countries in which they operate.

In particular, suppliers guarantee that their employees, subcontractors or representatives do not demand, offer, promise or grant any advantage to employees of LACROIX, its customers or partners, or to third parties close to them, with the aim of obtaining a contract or other advantage in commercial relations.

Invitations and gifts to LACROIX employees are only tolerated if they are reasonable, i.e. of symbolic value.

Suppliers undertake to ensure that the decisions they take in the course of their business with LACROIX are based solely on objective facts and elements, and do not create conflicts between their professional interests and their interests in the private sphere, such as personal interests related to family, friends, etc.

Competition and commercial practices

Suppliers undertake to behave in a fair and ethical manner, in particular in compliance with laws and regulations relating to competition rules and commercial practices. Suppliers must not enter into agreements that contravene laws relating to anti-competitive practices or take improper advantage of their status as a dominant company in the market. In the course of their activities, suppliers must also ensure that they do not violate the confidentiality or intellectual property of LACROIX or third parties, or damage their image or reputation in any way whatsoever. Suppliers shall also refrain, throughout the duration of their business relationship with LACROIX and for a reasonable period of time after termination, from poaching or attempting to poach LACROIX employees.

Suppliers undertake to comply with the laws and regulations on preventing and combating money laundering and the financing of terrorism.

Transparency

Suppliers undertake to ensure that their activities are carried out at all times with the greatest possible financial transparency, in particular with regard to the authorities, whether supervisory or otherwise, and to internal and external auditors, subject to any commitments in terms of confidentiality and business secrecy that may be incumbent upon them.

In this respect, suppliers undertake to comply with all applicable legal and regulatory obligations in terms of declarations, publication of accounts and payment of taxes for which they may be liable. They also undertake to make every effort to constantly improve the means of identifying and managing risks and internal control, and to communicate on request the steps taken in this respect.

Conflict minerals

In politically unstable areas, the mineral trade can be used to finance armed groups, fuel forced labour and other human rights abuses, and support corruption and money laundering. US regulations (section 1502 of the Dodd-Frank Wall Street Reform and Consumer Act of 2010) and then European regulations (Conflict Minerals Regulation applicable from 2021) aim to regulate the trade in the following minerals and metals: tin, tantalum, tungsten and gold (3TG).

These regulations require companies involved in the supply chain to ensure that they import these minerals and metals only from responsible, conflict-free sources.

LACROIX is concerned by these regulations, and asks its suppliers to carry out this analysis in their supply chain.

Alerts, verification, corrective action and sanctions

Compliance with the Code of Conduct and due diligence

Any violation of the principles and requirements set forth in this Code of Conduct is considered a material breach of the contractual relationship by suppliers. In case of doubt about compliance with these principles and requirements, LACROIX reserves the right to request information and supporting documentation from its suppliers.

LACROIX also reserves the right to visit, inspect or audit suppliers, with or without the support of a third party, in order to ensure that suppliers comply with this Code of Conduct.

Corrective action and sanctions

In the event of a breach of the terms of this Code of Conduct by any supplier, LACROIX reserves the right to take any appropriate sanctions against such supplier, including the possibility of terminating the business relationship between LACROIX and such supplier.

Alert procedure

If, in the course of doing business with LACROIX, a supplier believes that LACROIX or any of its employees are not complying with the letter or spirit of this Code of Conduct, the supplier may report the matter by writing to: compliance@lacroix.group

Suppliers must have a whistleblowing procedure in place that ensures, among other things, confidentiality and protection for whistleblowing employees so that they can raise concerns without fear of retaliation.

Supplier commitment

I, the undersigned _____ (name of the person), acting in my capacity as _____ (title of the supplier's representative) of the supplier _____ (name of the company) ("Supplier"),

confirm, on my behalf and on behalf of the Supplier, that the Supplier:

- Has received and fully understood the LACROIX Supplier Code of Conduct;
- Undertakes to comply with all applicable international, national and local laws and regulations, some of which are referred to in this Code of Conduct, and with all other principles defined by LACROIX in this Code of Conduct;
- Undertakes to ensure that its own suppliers, subcontractors or other partners, whoever they may be, comply with the terms of this Code of Conduct;
- Acknowledges that failure to comply with these laws, regulations and/or this Code of Conduct may result in the Supplier's liability, as well as the possible termination of commercial relations with the LACROIX Group entity or entities concerned.

Date : / /

Company name :

Name of representative :

Representative's title :

Signature:

Company stamp :