

CSR AND ETHICAL RECIPROCAL COMMITMENTS

Ponticelli and its Suppliers and Service-providers



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GROUPE PONTICELLI FRÈRES



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OUR VISION

Our reason for acting is to support the transformation of the world.

To this end, we work every day alongside our clients and suppliers to develop an industry of the future that respects people and our planet.

We are responsible for our operational performance, the quality of our creations, the perservation of our know-how, and the control of risks in order to guarantee our longevity, for the benefit of all.

Faithful to its historical values, which are Union, Work and Wisdom, the PONTICELLI Frères Group has developed a corporate culture that is both technical as well as deeply humane.

Our Sustainable Procurement approach is based on this cultural heritage and the recognition of the expectations of our stakeholders and relies on the policy of Social and Ethical Responsibility of our company.

We wish to share our commitments with regard to sustainable development with our partners and involve them in this approach of continuous improvement.



THE UNITED NATIONS GLOBAL COMPACT

The Ponticelli Group undertakes to respect the principles of the United Nations Global Compact.

By joining The United Nations Global Compact in 2017, the Group shows its willingness to follow the international standards and involve, as much as possible, all its stakeholders, including its suppliers in the approach in order to ensure that its development is sustainable. Thus, the Group commits and enhances its Suppliers to also undertake to respect and promote the 10 principles of the United Nations Global Compact.

OBJECTIFS DE DÉVELOPPEMENT DURABLE

THE PRINCIPLES

HUMAN RIGHTS

The companies are encouraged to :

- 1. Promote and respect the protection of international human rights law within their sphere of influence.**
- 2. Ensure that their own companies are not complicit in human rights violation.**

INTERNATIONAL LABOUR STANDARDS

The companies are encouraged to :

- 3. Respect the freedom of association and recognise the right to collective bargaining.**
- 4. Contribute to the elimination of all forms of forced or compulsory labour.**
- 5. Contributing to the effective abolition of child labour.**
- 6. Contribute to the elimination of any discrimination as regards employment and occupation.**

ENVIRONMENT

The companies are encouraged to :

- 7. Apply the precautionary approach to problems pertaining to the environment.**
- 8. Undertake initiatives that seek to promote greater environmental responsibility.**
- 9. Promote the development and distribution of environment-friendly technologies.**

FIGHT AGAINST CORRUPTION

- 10. The companies are encouraged to :
Act against corruption in all its forms, including extortion and bribery.**

OUR SUSTAINABLE PROCUREMENT POLICY OUR FUNDAMENTALS

**This document presents
the commitments of the
Ponticelli Group and its
reciprocal expectations
with regard to its suppliers.**

In order to promote our Responsible Purchasing approach, control our risks over our entire value chain and obtain sustainable performance to guarantee the Group's long-term future, our sustainable procurement policy is based on 4 principles :

**Preserving the health and safety and
respecting human rights**

**Maintaining a responsible
relationship with our Suppliers**

**Adopting irreproachable business
ethics**

**Contributing to local development
and reducing our environmental
impact**

Firstly, each party undertakes to respect the laws, comply with the rules of trade and competition set forth by the law and by the OECD Guidelines for Multinational Enterprises. They must also ensure that they develop the positive effects of their activities on the communities of the countries concerned.



THE COMMITMENTS OF THE PONTICELLI GROUP TOWARDS ITS SUPPLIERS

HUMAN RIGHTS AND WORKING CONDITIONS

1

To exclude all contractual relations with suppliers who are found to not comply with the regulations regarding forced labour, concealed work, child labour, discrimination, or who are complicit in violations in these aspects.

2

To respect, wherever required, all the applicable local legal provisions relating to labour law, and to ensure that the same is done by its suppliers, particularly those working on its sites or those of its clients.

3

Safeguarding the health and safety of all employees or parties involved is a priority for the Group. In this respect, the PONTICELLI Group undertakes to ensure that its suppliers respect the same safety standards and to support them in a continuous improvement process if the results are below the standards required by the Group.

4

Promoting the employment and professional integration of disabled people or people who are away from employment.



THE COMMITMENTS OF THE PONTICELLI GROUP TOWARDS ITS SUPPLIERS

ETHICS AND RESPONSIBLE RELATIONSHIPS WITH SUPPLIERS

5

Fight against all forms of corruption, be it active or passive, and exclude themselves from any situation that could present a conflict of interest by complying with the Code of Ethical Conduct in force. The Group employees may not offer gifts or benefits unless they are of low or a symbolic value, within the framework of good faith and strictly professional relations.

6

Treat all its suppliers fairly and impartially by setting up a selection process for its suppliers that is common to all and based on predefined selection criteria communicated during calls for tender.

7

Respect all contractual conditions, particularly payment deadlines.

8

Build long-term relationships with suppliers, with a view towards continuous and joint improvement. The Group undertakes to help strategic suppliers to improve if their results are below the standards applicable in the Group.

9

Limit situations of economic dependence of suppliers.

10

Have monitoring and control processes guaranteeing that products or services are produced, monitored and controlled under conditions that exclude any risk of fraud, falsification or counterfeiting.

11

Maintain confidentiality of technical, commercial and financial information communicated by our suppliers and protect personal data in compliance with the regulations in force.

12

Regularly communicate internally and externally about the Sustainable Procurement Policy.



THE COMMITMENTS OF THE PONTICELLI GROUP TOWARDS ITS SUPPLIERS

PROTECTION OF THE ENVIRONMENT

13

Respect the regulations regarding environmental protection in each location where Ponticelli operates.

14

Adopt an approach based on global impacts by taking into account the life cycle of products, by analysing the entire process of manufacturing, optimising packaging, transport, storage, maintenance and recycling.

15

Control and reduce greenhouse gas emissions, particularly those related to its vehicle fleet, or reduce its energy consumption by opting for less energy-consuming equipment. These criteria are included in the selection criteria of offers.

16

Work alongside suppliers to find solutions that enable the parties to reduce their environmental impact, such as digitising certain processes, reducing the number of physical meetings, and contributing to the implementation of more environment-friendly solutions.



THE COMMITMENTS OF THE SUPPLIERS TOWARDS PONTICELLI

HUMAN RIGHTS AND WORKING CONDITIONS

1

Respect the principles relating to human rights and labour law by refraining from any form of forced labour, concealed work, child labour, discrimination and by working for the continuous improvement of the working conditions of employees, particularly in terms of diversity and social protection.

2

Implement a health policy that aims to guarantee to each employee working conditions that do not endanger their health and safety and to maintain an environment in which human dignity is respected. Apply the health and safety requirements of the Ponticelli Frères Group, in particular when the supplier is working on one of Ponticelli's or its Client's sites.

3

Promote the professional integration of disabled people or people who are away from employment.

4

Exclude all contractual relations with its own suppliers or clients who are found to not comply with the regulations regarding forced labour, concealed work, child labour, discrimination, or who are complicit in violations in these aspects.



THE COMMITMENTS OF THE SUPPLIERS TOWARDS PONTICELLI

ETHICS AND RESPONSIBLE RELATIONSHIPS WITH SUPPLIERS

5 Fight against all forms of corruption, be it active or passive, and exclude themselves from any situation that could present a conflict of interest. The employees of the Ponticelli Frères Group may not receive gifts or benefits unless they are of low or a symbolic value, within the framework of good faith and strictly professional relations.

6 Disclose any situation that may appear to present a conflict of interest, and inform the Client about cases where a Ponticelli Group employee may have any interest in the supplier's activities, or a personal economic link with the same.

7 Respect all contractual conditions, and particularly the conditions of provision of the service or supply.

8 Be aware of not being in a situation of economic dependence towards its Client.

9 Have monitoring and control processes guaranteeing that products or services are produced, monitored and controlled under conditions that exclude any risk of fraud, falsification or counterfeiting.

10 Provide accurate and fair information that is not likely to mislead in the execution of the activities.

11 Maintain confidentiality of technical, commercial and financial information communicated by the Client and protect personal data in compliance with the current regulations.

12 Promote a sustainable approach among its own suppliers and subcontractors.



THE COMMITMENTS OF THE SUPPLIERS TOWARDS PONTICELLI

PROTECTION OF THE ENVIRONMENT

13

Respect the regulations pertaining to environmental protection in each location where the supplier operates.

14

Adopt an approach based on global impacts by taking into account the life cycle of products, by analysing the entire process of manufacturing, optimising packaging, transport, storage, maintenance and recycling.

15

Limit the impact on the environment by reducing greenhouse gas emissions, by setting up actions to reduce energy and water consumption in its activities. Set up a responsible waste treatment policy.

16

Work alongside Clients to find solutions that enable the parties to reduce their environmental impact, such as digitising certain processes, limiting the number of physical meetings, and generally, contributing to the implementation of more environment-friendly solutions.





For any questions, you can contact the Ethics and CSR Department of the Ponticelli Frères Group at conseilethique@ponticelli.com

The Ponticelli Frères Group undertakes to respect the principles stated above and to share its Corporate Social Responsibility approach with its partners.

Name of the representative :

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Position :

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Signature :

The Company.....
supplier/service-provider of the Ponticelli Frères Group, undertakes to respect the principles stated above and to ensure that its teams and its own service-providers respect them.

Name of the representative :

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Position :

.....

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Signature :

Place, date