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PARTNER CHARTER

SOGELINK GROUP

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1 EDITORIAL / INTRODUCTION

At Sogelink, we are committed to a CSR policy that involves responsibility at every level of the Group and towards each of our stakeholders.

Our mission : To implement concrete, lasting and measurable actions with our employees and our ecosystem (customers, suppliers, other stakeholders in society) to strengthen our commitment and best combine our economic, social and environmental performance.

Our sustainability strategy is built on 4 pillars:

- Building a sustainable organization that respects its employees
- Committing to responsible business: through our operations, from the design and hosting of our software to the choice of our partners;
- Protecting our planet;
- Acting positively on our ecosystem.

This Charter is intended to guide the Group's purchasing practices and to ensure that all our purchases comply with environmental, social and governance criteria. It sets out our commitments and expectations regarding the environment, business ethics and social issues, as part of an approach of continuous improvement and transparency.
As defined by AFNOR, responsible purchasing consists of purchasing goods or services from a company while seeking to:

- Minimize the environmental and social impacts associated with this purchase;
- Encourage ethical practices that respect human rights.

We are committed to promoting sustainable purchasing practices throughout our supply chain and to working with suppliers who share our social and environmental responsibility values.

Our teams ensure compliance with this charter and stand alongside our Suppliers to help meet these commitments.

Todor ATEV
Chief Financial Officer

Laure-Hélène CHEVALLIER
HR & ESG Director

2 SCOPE

The Sogelink Group[1] is sustainably committed to responsible, ethical and sustainable practices in the conduct of its activities.

This partner charter (hereinafter the "**Charter**") describes the responsibilities and commitments that employees, executives and partners of the Sogelink Group are required to comply with regarding purchasing.

Professional ethics and social responsibility are at the forefront of the Sogelink Group's concerns, guiding all its business relationships and interactions with its partners.

As a result, the Sogelink Group aims to ensure it chooses partners who share the same ethical commitment and respect the same principles regarding safety, health and environmental management.

2.1 WHO does the Charter apply to?

The Charter applies to all of the Sogelink Group's partners involved in purchasing, i.e. its suppliers, subcontractors, buyers and service providers (hereinafter the "**Partners**").

2.2 COMPLIANCE WITH LAWS AND APPLICABILITY

The Sogelink Group and its Partners undertake to comply with the Charter and all regulations applicable to them.

Where applicable laws are less stringent than the Charter, the Charter shall prevail, even if the conduct in question complies with the laws in force. Conversely, where an applicable law is more stringent than the Charter, it must be applied. Finally, where a contractual provision sets a higher requirement than one of the requirements contained in the Charter, it takes precedence.

More generally, Partners also undertake to comply with the following texts:

- the Universal Declaration of Human Rights;
- the United Nations (UN) Guiding Principles on Business and Human Rights;
- the fundamental conventions of the International Labour Organization (ILO);
- the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct;
- the United Nations Global Compact.

[1] The Sogelink Group refers to the group of companies made up of companies directly or indirectly controlled by SCORPIO TOPCO (Lyon Trade and Companies Register No. 982 237 653).

3 THE SOGELINK GROUP'S COMMITMENTS TO ITS PARTNERS

The Charter defines the principles guaranteeing a fair purchasing process. It ensures compliance with laws and regulations in force, ethical rules, and the social and environmental commitments made by the Sogelink Group as part of its CSR policy.

The Sogelink Group is committed to promoting social responsibility in its value chain and to maintaining business relationships with its Partners based on transparency, integrity and fairness, while honoring the commitments defined below.

3.1 FAIR AND EQUITABLE TREATMENT IN THE SELECTION OF ITS PARTNERS

The Sogelink Group selects its Partners in a transparent and fair manner, based on various criteria specific to each department: compliance with requirements and/or specifications, quality, cost, delivery time, after-sales service (non-exhaustive list), as well as the environmental, social and ethical impact of the products or services offered.

The Sogelink Group undertakes to:

- treat its Partners with fairness and transparency, in compliance with applicable laws and regulations,
- comply with legal and, where applicable, contractual payment terms,
- promote, as far as possible, local economic development in the choice of its Partners.

3.2 ANTI-CORRUPTION AND ECONOMIC DEPENDENCE POLICY

The Sogelink Group undertakes to comply with all the provisions of Law No. 2016-1691 of 9 December 2016 (hereinafter "**Sapin II Law2**") applicable to the fight against corruption and influence peddling and to the implementation of a procedure for reporting ethical concerns. It applies a zero-tolerance policy on corruption and influence peddling.

As such, the Sogelink Group undertakes not to propose, offer or promise, or to solicit, receive or accept, directly or indirectly, any undue advantage, in particular financial, to or from any private or public person.

To comply with its obligations and raise its employees' awareness of the fight against corruption and influence peddling, the Sogelink Group:

- Has set up an anti-corruption guide that it distributes internally;
- Organizes training for its employees;
- Includes ethical clauses in each of its general purchasing terms and conditions;
- Has set up a whistleblowing procedure available to each of its stakeholders.

The Sogelink Group remains vigilant regarding any risk of reciprocal economic dependence with its Partners.

3.3 SHARING KNOWLEDGE ON SUSTAINABLE DEVELOPMENT

The Sogelink Group recognizes the importance of collaborating and exchanging with Partners to achieve its sustainable development objectives. To this end, the Sogelink Group wishes to build lasting, trust-based relationships with its Partners. The Sogelink Group takes a co-construction approach, seeking mutual benefits in terms of sustainable development. It is willing to support its Partners in improving their social and environmental performance.

By collaborating with the Sogelink Group, Partners become part of a continuous improvement approach and undertake to work together to implement the necessary corrective actions.

3.4 COMMITMENTS TO TRANSPARENCY, COMMUNICATION AND CONFIDENTIALITY

The Sogelink Group undertakes to communicate transparently about the content of the Charter that it distributes to Partners.

Reasons for non-selection are communicated on request to Partners that have not been selected.

The Sogelink Group undertakes to keep confidential all non-public information communicated by its Partners and to protect their personal data in compliance with applicable regulations.

The Sogelink Group expects its Partners to demonstrate a willingness to engage in a sustainable approach, integrating the principles of the Charter into their practices and throughout their value chain, the Charter forming an integral part of the contract concluded between Sogelink and its Partners.

3.5 COMPLIANCE WITH COMPETITION LAW

The Sogelink Group affirms its commitment to complying with the laws, principles and regulations applicable to competition law. It undertakes in particular to:

- not participate in or implement an agreement aimed at eliminating or reducing competition in a market (joint setting of sale prices, market sharing, boycotts, etc.), and
- not exchange sensitive information with its competitors (prices, the content of a bid for a public contract, etc.).

3.6 COMPLIANCE WITH DATA PROTECTION REGULATIONS

The Sogelink Group makes compliance with personal data protection regulations a priority. As such, it complies with all applicable principles, laws and regulations relating to the protection of personal data.

The Sogelink Group undertakes in particular to ensure that all the personal data processing it carries out is based on legitimate and lawful purposes and grounds.

4 PARTNERS' COMMITMENT TO THE SOGELINK GROUP

4.1 SOCIAL COMMITMENTS AND RESPECT FOR HUMAN RIGHTS

Partners undertake to respect and promote:

- The principles and fundamental rights set out in the Universal Declaration of Human Rights adopted by the United Nations in 1948; and
- the working conditions required by the conventions of the International Labour Organization (hereinafter "**ILO**").

They comply with the laws in force in each country where they operate and ensure respect for human rights throughout their supply and value chain.

They must also ensure that their subcontractors respect and promote these rights and principles.

4.1.1 Labor law

Partners undertake not to employ persons who have not reached the minimum working age, as defined by applicable national laws and/or fundamental conventions No. 138 and 182 of the ILO. In any event, they prohibit themselves from employing persons under 18 years of age for any hazardous work.

All forms of work, including overtime, are voluntary.

As such, Partners also undertake not to resort, in any form whatsoever, to forced or compulsory labor, bonded labor, slavery or any other form of servitude, including contractual servitude, or involuntary labor, as defined in the ILO's fundamental conventions No. 29 and 105. Partners refrain from resorting to any verbal or physical threat, physical violence, sexual abuse, any form of harassment, or the withholding of identification documents as a condition of employment.

Partners comply with working hours in accordance with applicable regulations.

Workers are free to leave their job provided they comply with the conditions for terminating a contract set out in applicable regulations.

Partners undertake to pay their employees in accordance with the applicable legal minimum wage and to provide them with the legal benefits. In any event, they undertake to ensure that no deduction from pay is made on disciplinary grounds or for any other reason provided for by applicable regulations without the agreement of the employee subject to the deduction.

4.1.2 Individual freedom of employees

Partners guarantee fair treatment in the workplace. They prohibit any discrimination (racial, social or ethnic origin, sex, age, gender identity, family situation, pregnancy, physical appearance, surname, religion, political opinions, trade union activity, loss of autonomy, disability, age, sexual orientation, state of health, genetic characteristics) in recruitment and professional development and guarantee equal treatment. They also prohibit sanctioning, or assigning/modifying any working conditions on discriminatory grounds

Partners undertake to promote equal treatment and equal opportunity.

Partners must guarantee employees' individual freedoms by recognizing and respecting all rights and freedoms of expression, association, staff representation and the right to collective bargaining.

4.1.3 Health and Safety

Partners undertake to implement a health and safety policy aimed at guaranteeing each employee a working environment free of any danger to their health and safety, maintaining an environment in which people's dignity is respected, and an environment compliant with applicable regulations.

4.2 ENVIRONMENTAL COMMITMENTS

Partners undertake to continuously improve their environmental impact, in particular by complying with the environmental laws and regulations applicable to them.

4.2.1 Compliance with applicable environmental laws and rules

Partners apply the environmental laws and regulations in force at every relevant level (international, national and regional) for their activities. Where applicable, they hold all the authorizations necessary to carry out their activities and comply with rules relating to air, soil and water quality and pollution.

4.2.2 Environmental risks and impacts

Partners adopt the precautionary principle and are able to identify all potential environmental risks relating to their activities. They implement control systems to assess their environmental impacts. They take all appropriate measures to limit environmental risks or eliminate them as far as possible. They undertake to raise awareness and communicate on these topics with their employees and stakeholders.

Partners ensure responsible waste management, by reducing waste at the source and/or seeking recycling or reuse solutions.

Noise, dust, odor and particle emissions, as well as any other source of local pollution, must be controlled. Action plans must be put in place to control, minimize and treat these emissions.

The Sogelink Group encourages its Partners to commit to and limit the impact of their activities on the environment, in particular by reducing their greenhouse gas emissions and managing their digital pollution.

Partners are also invited to commit to sustainable use of resources, to limit water and energy consumption and the use of non-renewable natural resources or environmentally unfriendly products.

Where it has been carried out, Partners are encouraged to communicate their carbon footprint to the Sogelink Group, their *Science-Based Targets Initiative (SBTI) targets*, and their ECOVADIS rating.

4.3 BUSINESS ETHICS COMMITMENTS

Partners guarantee that they implement fair practices.

They undertake to comply with all regulations applicable to them regarding the fight against corruption and influence peddling, in particular the Sapin 2 Law. Where applicable, they implement a procedure enabling their stakeholders to report ethical concerns.

As such, Partners undertake not to propose, offer or promise, or to solicit, receive or accept, directly or indirectly, any undue advantage, in particular financial, to or from any private or public person.

They adopt ethical conduct in business relations and undertake to comply with the laws and regulations relating to the principle of fair dealing in force in the countries where they operate.

Partners undertake to promote a social responsibility approach with their own partners, in order to enable the dissemination and application of the principles of the Charter throughout the value chain. It is their responsibility to implement all reasonable due diligence measures with regard to their own subcontracting chain.

Partners must undertake to take into account the principles and guidelines of the Organisation for Economic Co-operation and Development (hereinafter the "**OECD**"). In doing so, they demonstrate their commitment to responsible and sustainable business practices. These principles cover essential areas of business ethics such as tax transparency and the fight against corruption. By complying with these principles and guidelines, Partners (i) contribute to global economic stability and prosperity and (ii) strengthen the trust of business partners and consumers. This compliance with OECD standards helps create a framework of mutual trust and cooperation, essential to conducting ethical and sustainable business.

4.4 COMMITMENTS REGARDING COMPLIANCE WITH COMPETITION LAW

Partners adopt policies and conduct that comply with the laws, principles and regulations applicable to competition law.

Without this list being exhaustive, Partners are in particular prohibited from:

- participating in or implementing an agreement aimed at eliminating or reducing competition in a market (joint setting of sale prices, market sharing, boycotts, etc.),
- exchanging commercially sensitive information with their competitors (prices, the content of a bid for a public contract, etc.),
- where applicable, abusing their dominant position in order to eliminate or reduce competition, or to maintain or increase their dominant position in a market (predatory pricing, tied sales, margin squeeze, etc.).

4.5 COMMITMENTS REGARDING THE RIGHT TO DATA PROTECTION

Partners guarantee that they comply with the principles, laws and regulations applicable to data protection.

Consequently, Partners in particular ensure that the personal data processing they carry out complies with the GDPR and is based on legitimate and lawful purposes and grounds.

4.6 TAX COMMITMENTS

The Sogelink Group attaches great importance to complying with applicable tax rules. Partners undertake to comply with all applicable tax rules, international conventions and industry tax standards applicable in the countries where it operates. Partners do not engage in deliberate tax evasion.

4.7 WHISTLEBLOWING MECHANISM AND PROTECTION OF REPORTS

The Sogelink Group has set up a whistleblowing mechanism, open to everyone, employees or third parties (suppliers, service providers, etc.), enabling them to report to it, voluntarily, confidentially and securely, any situation or conduct, existing or reasonably suspected of occurring, that would be contrary to ethics, applicable laws and regulations, or this Charter.

The whistleblowing procedure is accessible via our website www.sogelink.com. The form is accessible at the following address: SOGELINK GROUP WHISTLEBLOWING REPORT FORM – Fill out the form.

Partners acknowledge that they have read this Charter and undertake to apply it and promote it throughout their subcontracting chain.

They respond promptly to requests and agree to be assessed or audited by the Sogelink Group, or by a third party appointed by the Sogelink Group, on the principles set out above. In the event of a proven breach of one (or more) of the principles of the Charter, the Sogelink Group reserves the right to disengage from Partners who fail to comply with it (or them). Where applicable, the Sogelink Group may exclude from its selection process Partners who fail to comply with applicable ethical standards and laws.

The Sogelink Group expects its Partners to themselves ensure that the principles of the Charter are respected by their own partners, subcontractors and service providers.

Name, First Name and Position of signatory:
Signature: