

# RESPONSIBLE PURCHASING CODE of conduct

ADEO SUPPLIERS V. 07/07/2023



# SUMMARY





## **1. THE KEY ELEMENTS OF ADEO CULTURE**

## 2. TO WHOM DOES THIS ADEO RESPONSIBLE PURCHASING CODE OF **CONDUCT APPLY?**

## **3. ADEO COMMITMENTS**

- A. SELECTION OF SUPPLIERS
- **B. ETHICAL BEHAVIOUR OF THE ADEO COMMUNITY**
- C. REDUCTION IN THE RISK OF SIGNIFICANT ECONOMIC DEPENDENCY
- D. CONFIDENTIALITY AND INTELLECTUAL PROPERTY
- E. MUTUAL EFFICIENCY

## **4. YOUR COMMITMENTS**

- A. SOCIAL ASPECT
- 1. Health and safety of employees and stakeholders
- 2. Respect human rights
- 3. Diversity
- 4. Fight against sexist behaviour and harassment
- **B. BUSINESS ETHICS ASPECT**
- 1. Gifts, hospitality and travel
- Conflicts of interest
  Corruption and facilitation payments
- 4. Honorability & transparency 5. Compliance with international sanctions
- **ENVIRONMENTAL ASPECT** С.
- 1. Sustainable management of resources

- Safe and healthy products
  Responsible manufacturing
  Transport of products
  Repairability / after-sales service
- 6. End of product life
- D. QUALITY ASPECT
- E. DATA COMPLIANCE ASPECT

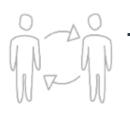


## **5. MONITORING OF COMMITMENTS**

- 6. PENALTIES AND CONSEQUENCES OF NON-COMPLIANCE WITH THE **RESPONSIBLE PURCHASING CODE OF CONDUCT**
- 7. HOW TO REPORT A BEHAVIOUR OR SITUATION CONTRARY TO THE **RESPONSIBLE PURCHASING CODE OF CONDUCT?**



**8. SIGNATURE** 



# **1. THE KEY ELEMENTS OF ADEO CULTURE**

ADEO is a platform of companies that are open and connected with partners. Every day, we make products and solutions available, either in store or online, that are useful for inhabitants and housing professional projects. Living in a healthy, secure, responsible, sustainable, economical and comfortable environment is crucial for the well-being of inhabitants everywhere around the world. We are all motivated by a shared purpose: to be useful. Useful to ourselves, to others and to the world.

#### We make home a positive place to live

Our purpose is to engage all citizens in making our homes a positive place to live, our common home being the planet. We engage all our stakeholders in our approach.

Each of the companies making up the ADEO community has **strong values that are shared by all employees and lived out on a daily basis.** Our values define our behaviour within our companies but also within our ecosystem of customers, suppliers, service providers, administrations, etc.

This Responsible Purchasing Code of Conduct demonstrates the determination of ADEO and all its member companies (hereinafter "ADEO") to apply the principles and values of ADEO to all of its Suppliers (as defined below).

# 2. TO WHOM DOES THIS ADEO RESPONSIBLE PURCHASING CODE OF CONDUCT APPLY?

This ADEO Responsible Purchasing Code of Conduct applies to **all ADEO Merchant Suppliers as** well as **Sellers on the Marketplaces**, as defined below, subject to any specific local legal conditions.

"Supplier" means any person or entity directly supplying goods to ADEO companies worldwide, as well as their subsidiaries, sister companies, subcontractors and suppliers, if any.

- This definition applies to all parts of this Code, unless otherwise specified in the text.
- Where the term "Signatory Supplier" is used, it refers only to the signatory supplier of this Code.

The Supplier shall ensure the application of the Code's measures to its subsidiaries, sister companies, subcontractors and suppliers as defined by the Code's components.

"Seller" in the marketplace, means any natural or legal person who supplies goods to an end customer via a marketplace of an ADEO entity.

Under this Responsible Purchasing Code of Conduct, the term "Supplier" includes the two previous concepts.

When the Code of Conduct for Responsible Purchasing is more demanding than local laws or practices, as a Supplier, I commit to respect the present Code of Conduct which must take precedence for entities in relation with ADEO. Provided that the provision of this Code of Conduct is not contrary to local law or regulation.

As a supplier, I therefore undertake to sign the Responsible Purchasing Code of Conduct and to collaborate with ADEO companies to implement it and, if necessary, to take any appropriate corrective measures in a continuous improvement process. Compliance with the principles of this Responsible Purchasing Code of Conduct is essential and decisive for the continuity of relations between ADEO companies and its Suppliers.

ADEO may modify the Responsible Purchasing Code of Conduct at any time in order to be able to respond appropriately to legislative changes or new situations. On this occasion, the new version of the Code will be submitted to you for renewed approval.



ADEO Suppliers play a key role in the growth and success of the ecosystem that ADEO wishes to create with their contribution. ADEO is committed to respect the principles hereafter with suppliers who share the same values and who are involved in the same approaches as ADEO, illustrated in this Code. It is therefore important to recall the commitments we make to them.

# **A. SELECTION OF SUPPLIERS**

The selection of Suppliers is carried out through an objective, fair purchasing or integration process based on defined criteria such as qualifications, function, experience and performance.

ADEO promotes social and environmental clauses and enhances the social responsibility actions of its suppliers. These criteria are integrated into the choice of suppliers during the selection of ranges and in particular during calls for tender.

Communication of their non-selection in a call for tenders is made to the Suppliers not selected.

# **B. ETHICAL BEHAVIOUR OF THE ADEO COMMUNITY**

ADEO has formalised the behaviours expected from its employees in the ADEO Code of Ethical Conduct which is addressed to them and which constitutes their frame of reference to be respected. The 10 commitments concern:

- Safety
- Diversity
- Sexist behaviour and harassment
- Personal data protection
- Conflicts of interest
- Invitations and gifts
- Corruption and facilitation payments
- Relations with suppliers, service providers and intermediaries
- Grants, patronage, sponsoring, lobbying
- Fight against fraud

As a result, all our decisions in our Suppliers selection are also based on these ethical principles.

# C. REDUCTION IN THE RISK OF SIGNIFICANT ECONOMIC DEPENDENCY

ADEO ensures that Suppliers are not in a state of significant economic dependency which could endanger their activity, by inviting them, for example, to constantly diversify their clients.

Otherwise, the Supplier :

- takes actions to get out of this state as soon as possible,
- keeps its ADEO correspondent informed of the evolution of the situation (appearance or disappearance of this risk).

# D. CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Both ADEO and the Supplier undertake to keep confidential the technical, commercial and financial information that each wishes to protect and in particular to respect the intellectual property rights of the other as provided for by local regulations and the contract between the parties.

# **E. MUTUAL EFFICIENCY**

In order to improve mutual efficiency with its Suppliers, ADEO is particularly careful to improve coordination, to continuously improve its practices, and to anticipate orders from Suppliers as far in advance as possible in order to limit the risk of sudden changes in order volumes.

ADEO wants collaboration with suppliers and vendors to contribute to a positive impact and create value for all stakeholders. ADEO wishes to guarantee for each party a sharing of the value created and a fair profit.



## **A. SOCIAL ASPECT**

ADEO's approach is based on respecting and promoting fundamental principles concerning human rights and working conditions.

Each Supplier must ensure that it respects and enforces fundamental principles relating to human rights and working conditions, and applicable legislation.

Therefore, as a Supplier, I commit to:

# 1. Health and safety of employees and stakeholders

- $\rightarrow$  Ensure health and safety of employees and stakeholders in their workplace and in the residential areas are provided to them.
- → Ensure safety, integrity, maintenance and control of the building structure and equipment and take appropriate fire-fighting measures throughout the life of the building, including any modifications. All associated documents and permits must comply with the law.
- → Eliminate or, where this is not possible, reduce to a minimum, in accordance with the knowledge acquired on the basis of technical progress, situations which expose employees to risks to their health and safety, whether physical, chemical or biological, and provide the necessary collective and individual protective equipment.
- $\rightarrow$  Raise awareness and train employees on the risks inherent in their activities.
- $\rightarrow$  Provide medical aid and first aid kits free of charge.
- → Ensure that the methods of delivery and/or handover of products sold and/or delivered to ADEO meet the safety standards as defined in the ADEO safety guidelines (e.g. palletization of products).

## 2. Respect for human rights

#### $\rightarrow$ Prohibition of child labor

Prohibit child labor in accordance with the strictest standard between the local legislation applicable to me and ILO Convention 138 which defines 15 years as the minimum legal age.

#### $\rightarrow$ Prohibition of all dangerous work

Prohibit all dangerous work and all night work for persons under 18 years of age.

#### $\rightarrow~$ Abolition of forced labour and trafficking in persons

- Prohibit the use of slavery, forced labour, debt bondage, or other forms of labour, including any work or service which is involuntarily undertaken or provided by any person under the menace of any penalty and/or without pay.
- Prohibit the use of prison labour.
- $\rightarrow$  Prohibit participation in human trafficking or the hiring of any victim of human trafficking.
- $\rightarrow$  Prohibit restricting freedom of movement during and outside working hours.
- $\rightarrow$  Allow workers to leave the company after giving legal notice.

These requirements also apply to recruitment and staffing agencies used by the Supplier.

#### $\rightarrow~$ Freedom of association and collective bargaining

Respect the right of association and collective negotiation without interference. If association and/or collective bargaining are restricted by local law, alternative means of worker representation should be offered, within the framework of what is permitted by the law of the country.

#### $\rightarrow$ Compensation

- Pay employees wages, overtime, benefits and holiday pay at or above the legal minimum or prevailing wage level.
- Prohibit illegal deductions from wages.
- Systematically provide employees with a written document with the conditions of employment, including remuneration elements salaries as well as a payslip with each payment in a language understood by the employees.

#### $\rightarrow$ Working hours

- Set working hours in accordance with national legislation and International Labour Organisation conventions.
- Guarantee at least one day of rest every seven days, paid annual leave and public holidays in force locally.
- Respect the basis of voluntariness for all overtime worked.

## 3. Diversity

Working with ADEO means working with a company that promotes diversity in all its forms, whether that of its teams or that of the partners with whom it interacts.

Similarly, any discrimination, in particular based on origin, sex, disability, family situation, pregnancy, state of health, sexual orientation, age, political and philosophical opinions, trade union activities, belonging or not belonging, real or supposed, to an ethnic group, nation or religion is to be avoided.

ADEO fully adheres to the laws and international agreements that fight against discriminatory behaviour and goes even further, by adhering to:

- the United Nations Global Compact : SDGs
- the Women's Empowerment Principles (WEPs)
- the ILO Global Business Disability Network

ADEO's contracting, supplier selection and assignment decisions are based both on objective criteria such as the Supplier's qualifications, function, experience and performance, as well as on the ability to promote and respect diversity within its structures.

- $\rightarrow\,$  Fully respect the laws and international agreements that fight against these behaviours.
- → Support and promote our commitment to a working environment free of all forms of discrimination or/and harassment both in my company and in my relationship with ADEO.
- $\rightarrow$  Ensure that a culture of mutual respect is maintained and promoted.
- → Report to ADEO any situation contrary to these principles involving an ADEO employee that I am aware of, whether this behaviour comes from one of my colleagues or from an ADEO employee.

# 4. Fight against harassment and sexist behaviour

Each of us has the right to respect and human dignity. At ADEO, this principle is fundamental to the way we work with our ecosystem. Any behaviour or action that could go against this right, and in particular any form of moral and/or sexual harassment, is unacceptable.

Moral harassment is manifested by behaviour, words, repeated and hostile acts that undermine the dignity or integrity of the person employee.

Sexual harassment is the repeated imposition on a person, of whatever sex, of comments or behaviour with a sexual connotation which violate his or her dignity because of their degrading or humiliating nature or which create an intimidating, hostile or offensive situation. The same applies to any form of pressure, even if not repeated, with the real or apparent aim of obtaining an act of a sexual nature for the benefit of the harasser or a third party.

In addition to harassment, it is also everyday sexist behaviour that we do not tolerate at ADEO. It is incompatible with the development of an inclusive culture.

- $\rightarrow\,$  Adopt exemplary behaviour by not taking any action that can be qualified as harassing or sexist.
- $\rightarrow$  Prevent any act of harassment or sexist behaviour by my employees.
- $\rightarrow$  Have any behaviour stopped if I am told it is inappropriate.
- → Denounce any situation of sexist behaviour or harassment involving an ADEO employee that I am aware of, whether this behaviour comes from one of my colleagues or from an ADEO employee.

# **B. BUSINESS ETHICS ASPECT**

The general principles of the ethical component apply to all Suppliers. The formal elements (honorability & transparency) apply only to ADEO's Signatory Suppliers.

## **1.** Gifts, invitations and travel

Gifts, invitations and travel can influence independence of judgement in the context of business relations, as well as independence with our partners.

The rule is not to offer anything to ADEO employees.

- $\rightarrow\,$  Refrain from inviting an ADEO employee to a sporting, cultural or leisure event.
- $\rightarrow$  Refrain from inviting an ADEO employee on a non-business trip.
- → For business travel, respect the criteria defined by ADEO. Namely, ADEO covers the travel expenses of its employees. The payment of all or part of the business travel expenses of ADEO's employees by the Supplier is only possible with the express authorisation of the ADEO employee manager.
- $\rightarrow\,$  Do not give any gifts, whether money, material goods or services, with the exception of small promotional "goodies", such as promotional pens, mugs, etc.
- $\rightarrow$  Do not accept any gifts from ADEO employees unless they are "goodies".
- → For any meal, accept that everyone takes their share, or possibly, the ADEO employee could (i) invite me in accordance with their internal policies on the matter or (ii) I could invite them with the agreement of their manager according to the ADEO process.
- → Refrain from soliciting, in exchange for a good, service or other, any advantage (commercial discount, equipment, etc.) that could influence my professional decision-making.

## 2. Conflicts of interest

As a Supplier, I am particularly careful to prevent or avoid any situation of conflict between my personal and professional interests. In the context of my relationship with ADEO, I act solely within the framework of a professional relationship, without ever trying to gain a personal advantage. My conduct must be honest so as not to damage the reputation of my company or that of ADEO.

#### Therefore, as a Supplier, I commit to:

- $\rightarrow\,$  Inform ADEO of any potential or proven conflict of interest situations. ADEO will decide what action to take.
- $\rightarrow\,$  Refrain from concealing from ADEO a situation of potential or proven conflict of interest.
- → Refuse to participate in, to supervise, or influence any professional decision concerning a member of my family, a personal relationship or a person employed by ADEO to whom I am financially committed.

## 3. Corruption and facilitation payments

Corruption and facilitation payments are prohibited.

It is any undue advantage (sum of money, benefit in kind such as a gift, even a modest one, etc.) paid on a personal basis to a public or private person for the performance, non-performance or acceleration of routine acts (customs clearance, issuing of permits, etc.).

- $\rightarrow\,$  Refrain from offering, promising, granting or authorising the remittance of a facilitation payment or any other undue advantage to :
  - o An ADEO employee in order to obtain any advantage from the latter;
  - o A legal or natural person, private or public, in particular within the framework of the execution of my service for ADEO.
- → Refuse any direct or indirect requests for a facilitation payment or any undue advantage from an ADEO employee or from a private person (e.g. auditors, control laboratories, etc.) or public, in particular within the framework of the performance of my service for ADEO.

## 4. Honorability & transparency

Any Signatory Supplier will be required to follow a process so that ADEO can verify its good standing.

Any Supplier must ensure that procedures are in place to ensure that accounting transactions are not used to conceal corruption.

#### <u>Therefore, as a Supplier, I commit to:</u>

- $\rightarrow\,$  Responding to questionnaires sent and other requests for documents from ADEO related to the conduct of honorability reviews.
- $\rightarrow$  Ensure that all services and deliveries are defined as precisely as possible.
- $\rightarrow$  Check that the financial compensation is justified and proportionate to the nature and importance of the services and deliveries provided.
- $\rightarrow$  Comply with the applicable legal rules on traceability and bookkeeping.
- $\rightarrow$  Check that when payment requests are made to ADEO, the contractual chain is respected. Thus, it is one and the same company that signs the contract with ADEO, issues the invoice, and holds the bank account to which the transfer is made. When the supplier is not registered in the European Economic Area, its bank account must be domiciled in its country of registration.

## 5. Compliance with international sanctions

ADEO is subject to compliance with applicable national and international laws and regulations regarding the control of its imports and exports. ADEO ensures the legality of its trade and must also ensure that its activities are carried out in full compliance with the economic and financial sanctions regimes imposed by International Organisations and States, and countries where ADEO operates, including the United Nations, the European Union and Poland.

- $\rightarrow$  Comply with applicable laws and regulations on economic sanctions or embargoes,
- $\rightarrow\,$  Provide information relating to the application of these sanctions if requested by ADEO.

# **C. ENVIRONMENTAL ASPECT**

ADEO is committed to acting in an environmentally friendly manner, involving all stakeholders, from the initial design of products and packaging and throughout their entire life cycle, covering several preservation issues: water, air, soil, noise, biodiversity, raw materials and energy, and preventing climate change.

The objectives are to develop a more positive footprint of our activity by:

- Limiting the consumption of non-renewable natural resources,
- Minimising the environmental impacts and risks to human health of products proposed in the ADEO offer,
- Making sustainable and more resource-efficient housing accessible to as many people as possible.

As a Supplier, I undertake to identify and implement measures necessary to reduce the potential impacts of my activities on the environment and on human health.

## **1. Sustainable management of resources**

ADEO is committed to sustainable and responsible resource management in the context of its activities.

- → Optimise the amount of raw materials used in the manufacture of products in my offer, i.e. to reduce the weight of the target material as much as possible, while maintaining the performance of the product concerned.
- $\rightarrow$  Promote the use of so-called responsible raw materials, namely:
  - Raw materials from responsible sources, certified if necessary.
  - Raw materials with a reduced carbon footprint, with priority given to bio-sourced (if relevant) and recycled materials, provided that they offer a technical quality and a level of health safety at least equivalent to those of the raw materials.
  - Raw materials for which a technically and economically viable end-of-life solution exists, in particular in the case where the product itself benefits from an end-of-life management channel (recycling, composting, etc.)

- Whose extraction conditions respect the rights of local populations and ecosystems.
- $\rightarrow$  Develop responsible packaging, and in particular to remove from the composition:
  - polyvinyl chloride (PVC),
  - expanded polystyrene (EPS),
  - biomaterials without an end-of-life channel or whose production would compete with that of foodstuffs for human use or animal,
  - in general, any material considered as non-recyclable.

## 2. Safe and healthy products

ADEO aims to restrict the direct exposure of people to the most dangerous substances contained in products throughout the supply chain, i.e. from manufacture to use for both private and professional customers. This objective is particularly relevant to improving indoor air quality in the home.

Consequently, as a Supplier, I act either on the composition of my products, or on the dissemination of information allowing a healthy use of these products.

## 3. Responsible manufacturing

ADEO is committed to limiting the environmental impacts related to the manufacture of the range of products made available to its customers.

- $\rightarrow$  Control and limit the environmental impacts linked to my activity.
- $\rightarrow\,$  Measure and optimise the consumption of water and energy to limit the carbon impact of production.
- → Control the risks of air, water and soil pollution by treating all wastewater and effluents, filtering emissions into the air and appropriately storing hazardous substances and waste.
- $\rightarrow~$  Treat, reduce, reuse and recycle waste from production.

- → Ensure that the risk associated with all chemicals used throughout the value chain is properly controlled, from raw materials to storage, including all phases of product production and transport.
- $\rightarrow$  Eliminate or limit substances that are hazardous to humans and the environment in all processes and seek alternative substances to replace them.

## 4. Transport of products

ADEO is committed to limiting the environmental impact of product transportation.

#### Therefore, as a Supplier, I commit to:

- → Promoting whenever possible transport with the least impact on the climate: rail, river, as a priority to road, and innovative transport for the last kilometres (electric, hybrid, liquified gas, etc.).
- $\rightarrow$  Optimising loading rates, while guaranteeing safe unloading conditions.
- → Favouring charters to carriers who have signed the "Objectif CO2" charter. This charter aims to reduce CO2 emissions, in particular through the use of a fleet of vehicles that significantly reduce fuel consumption, but also the training and commitment of drivers.

## 5. Repairability / After Sales Service

ADEO is committed to doing everything possible to ensure that products designed for a given use last as long as possible. This commitment is possible thanks to the measurement of product reliability via our after-sales returns, and also through a proactive approach by our offers and suppliers teams to promote and implement product repairability, as soon as it concerns a product category.

#### <u>Therefore, as a Supplier, I commit to:</u>

 $\rightarrow$  Explicitly present with the product the conditions of use and operation for an optimal and risk-free use for the customers..

- $\rightarrow$  Promote durability and repairability as much as possible, starting from product design, in order to extend its lifespan and fight against planned obsolescence.
- → To agree with ADEO and its companies on the duration of availability of spare parts and the modalities of accessibility at the time of referencing, as well as all elements allowing our customers and collaborators to significantly increase the share of repaired products (e.g. exploded views, diagnostic tutorials, repair tutorials, repairer networks).

## 6. End of product life

ADEO is committed to a more circular approach to the product life cycle by promoting the reuse and recycling of products when they reach the end of their life.

#### Therefore, as a Supplier, I commit to:

- $\rightarrow\,$  Provide customers with explicit instructions for sorting and recycling the product at the end of its life.
- $\rightarrow\,$  Promote the reuse and recycling of end-of-life products to encourage the circular economy.

# **D. QUALITY ASPECT**

Quality, the foundation of trust, is naturally at the heart of ADEO's business plan and our constant concern for customer satisfaction. It is a powerful relay of our ambitions and an essential vector of our values and commitments.

By Quality, we mean a high level of product safety and conformity, but also a high level of satisfaction in use throughout the product life cycle.

#### In this context, ADEO applies a Quality Assurance approach that enables it to:

- Make the Supplier responsible for demonstrating control of its quality process and its continuous improvement approach,
- **Develop the convergence**, the strength of proposal and innovation of the Supplier in particular with regard to the use of the products.

- → Implement the ADEO quality processes adapted to my responsibility (Subcontractor of ADEO brand products (M.D.H), Manufacturer, Importer, Wholesaler, Distributor/Seller) at each stage of the product life cycle. I undertake to deliver the burdens of proof and/or to carry out the actions allowing to demonstrate the control:
  - **Compliance of the raw material chains** that make up my product offering with the regulatory requirements and specific social and environmental requirements of the ADEO Group.
  - **Compliance of the industrial processes** with regulatory requirements and specific social and environmental requirements of the ADEO Group.
  - **Compliance of my product offer** with regulatory requirements, functional promises, compositions, claims, possible voluntary guarantees and specific technical, social and environmental requirements of the ADEO group and of customer satisfaction.
  - **Compliance of the pre-contractual information** delivered at the distribution stage of the products relayed by the distributor/seller.
  - **Compliance of the treatment of anomalies**, non-conformities and disputes with customers up to the implementation of withdrawal from sale and the treatment of product recall.
  - Compliance with any post-purchase information services, after-sales customer care and voluntary guarantees and sales record keeping.
  - Compliance with any regulatory obligations to contribute to product recycling (waste collection, financial contribution to recycling, record keeping)

## **E. DATA COMPLIANCE ASPECT**

This section applies only to ADEO's Signatory Suppliers.

ADEO has ambitious commitments with regard to the processing protection of personal data, over and above the regulatory constraints which must be respected at all times. Thus ADEO wishes to build a lasting relationship of trust with its customers-inhabitants, partners and Suppliers.

### <u>Therefore, from the moment when I have access to the data</u> of ADEO customers-inhabitants and/or its employees, as a <u>Supplier, I commit to:</u>

- $\rightarrow$  Use the personal data of the persons concerned, in compliance with the regulations in force, the ethical principles and the values of ADEO.
- $\rightarrow\,$  Ensure the localisation of personal data in accordance with the laws and regulations applicable to me.
- $\rightarrow$  Ensure optimal security of personal data.
- $\rightarrow\,$  Set up retention periods for personal data that are relevant to the uses defined and communicated.
- $\rightarrow$  Respect all the rights attached to the persons concerned with regard to personal data protection.
- $\rightarrow$  Notify any loss or breach of personal data within 24 hours.
- $\rightarrow\,$  If my service involves the collection of personal data directly from ADEO's customer-inhabitants:
  - Communicate in advance and clearly to customer-inhabitants the uses related to the collection of personal data.
  - Obtain free, specific and informed consent from customers-inhabitants prior to the collection and use of their personal data and to be able to justify it, in compliance with applicable laws, regulations and contractual provisions.



# **5. MONITORING OF COMMITMENTS**

## **Communication and information**

As a Supplier, I undertake to communicate for application this ADEO Responsible Purchasing Code of Conduct to all my employees working with ADEO as well as to stakeholders, as defined above, working for ADEO.

## Monitoring compliance with commitments

ADEO and its companies will verify compliance with these commitments as part of their duty of care.



# 6. PENALTIES AND CONSEQUENCES OF NON-COMPLIANCE WITH THE RESPONSIBLE PURCHASING CODE OF CONDUCT

As a Supplier, I acknowledge that compliance with the principles set out in this Responsible Purchasing Code of Conduct is an essential element of the commercial relationship with ADEO.

Failure to comply with any of the provisions of this Code may result, in accordance with the provisions of the contract, in immediate corrective measures or, depending on the seriousness of the failures and/or lack of corrective action plans, in termination of the contract.

# 7. HOW TO REPORT A BEHAVIOUR OR SITUATION CONTRARY TO THE RESPONSIBLE PURCHASING CODE OF CONDUCT?

In case of any behaviour or situation contrary to the Responsible Purchasing Code of Conduct and in order to report it to ADEO, a secure alert channel is set up.

This channel is a tool for you to share with us the situations you wish to bring to our attention.

### <u>As a Supplier, I commit to:</u>

 $\rightarrow$  Inform through the alert channel, as soon as possible after discovery, any breach of the rules of the Responsible Purchasing Code of Conduct.

## Who can report?

The alert channel is open to any ADEO's Supplier and subcontractor as well as their respective employees, subsidiaries, subcontractors and suppliers.

The author of the report must act in good faith, i.e. without malice or without seeking any personal gain. At the time of the report, he must have evidence to believe in the truthfulness of the reported statements.

#### <u>As such, as a Supplier, I undertake to:</u>

→ Inform my collaborators, subsidiaries, subcontractors and suppliers working with ADEO of the existence of this alert channel.

## How to report ?

All reports should be made via the alert channel accessible through the following link:

https://adeo.whispli.com/lp/third-parties



## **Protection of the alert author**

## **1. Confidentiality & Discretion**

The author of the alert has the possibility to remain anonymous or to make his/her identity known at the time of the alert or during the processing. ADEO takes all necessary measures to protect the identity of the author, the persons involved and the persons targeted by the report.

Information, investigations and reports resulting from an alert will also be treated with the utmost confidentiality.

### 2. Protection of the alert author

The author of an alert issued in good faith is protected with regard to the facts reported. The same protection is afforded to any third party facilitating in good faith the issuing of the alert or its handling (e.g. as a witness). The author of a report made in good faith may not be punished, or be the subject of a discriminatory measure or direct or indirect reprisals, even if the facts reported do not prove to be justified after investigation.



As a Supplier, I hereby confirm:

- $\rightarrow$  That I have received and fully read the present ADEO Responsible Purchasing Code of Conduct.
- $\rightarrow$  That I support and undertake to comply with its principles and that not complying with them may be considered as a breach of my obligations likely to lead to the application of the penalties specified above.
- → That I will inform my own employees, suppliers and subcontractors of this ADEO Responsible Purchasing Code of Conduct as soon as they are in a business relationship with ADEO and that I will ensure their compliance.

Company name of **the Supplier**:

Name and position of representative:

Signature:

Signed in:

On: ....../....../...... Company stamp

List of ADEO documents available on the supplier portal (or supplier site adeo.com):

- Raw materials policy (including wood)
- Hazardous substances policy
- Packaging policy
- Supplier Quality Manual

V.07/07/2023







