

Information for ATEQ's suppliers

SUPPLIER CODE OF CONDUCT



“Sharing a set of core values dealing with business ethics,
social and environmental commitments.”

Dear Supplier,

ATEQ pays attention that its suppliers, including but not limited to service providers, subsidiaries as well as any third party in a business relationship with an ATEQ Group entity and their subcontractors, share with it a set of core values dealing with business ethic, social and environmental commitments.

In the conduct of its activities, ATEQ is committed to respect all applicable national and international laws, regulations and conventions, as well as practices in the areas of labor standards and social responsibility, environmental protection, ethic and business integrity.

ATEQ assumes responsibility for a value chain that is based on compliance with international standards and legislation and adopts the highest possible level of ethics.

For this reason, ATEQ sets out in this Supplier Code of Conduct its standards for compliance with applicable legislation: human rights and non-discrimination principles, labour, ethics, health, safety and the environment.

ATEQ strives to maintain a close and lasting relationship on trust with its suppliers, based on the highest possible standards of business conduct.

Therefore, ATEQ considers the principles set forth in this document and the principles stipulated in the ILO Conventions, the Universal Declaration of Human Rights, the United Nations Global Compact and the OECD Guidelines for Multinational Enterprises as essential conditions for business relations with ATEQ.

ATEQ therefore expects its suppliers to comply with the principles set out in this Supplier Code of Conduct and to ensure that their own suppliers do the same in carrying out their activities for the ATEQ Group throughout the supply chain.

This Code of Conduct will promote trusting collaboration with ATEQ's partners, customers or suppliers.

Patrick SERRA
Directeur Général



1. LABOUR STANDARDS COMPLIANCE AND SOCIAL RESPONSIBILITY

ATEQ expects its suppliers to behave in an exemplary manner with regard to social responsibility.

PROTECTION OF HUMAN RIGHTS AND FIGHT AGAINST FORCED LABOR

ATEQ suppliers are committed to respect the human rights and freedom of movement of workers. ATEQ does not tolerate any form of abusive or illegal labor in its supply chain such as forced labor or human trafficking. Any form of forced labor, slavery, servitude by its suppliers, as well as the withholding of identity papers or work permits or the requirement for workers to post bail or the use of any other coercion is strictly prohibited. All workers have the right to freely accept or leave employment.

In addition, ATEQ suppliers must comply with all applicable regulations to prevent illegal, clandestine and undeclared labor.

FIGHT AGAINST CHILD LABOR

ATEQ expects its business partners to ensure compliance with the ILO provision and/or Article 32 of the UNCRC on child labor by prohibiting all forms of child labor. If a child is found to be working on the supplier's premises, the supplier must take steps to remedy the situation in order to serve the best interests of the child. Suppliers may use legal, legitimate and properly enforced apprenticeship programs, such as student internships.

FIGHT AGAINST HARASSMENT AND ABUSE

ATEQ's suppliers are required to treat their workers with respect and dignity and prohibit any behavior or practice involving physical punishment, physical, sexual, verbal or psychological harassment or any other form of abuse.

FIGHT AGAINST DISCRIMINATIONS

ATEQ expects its suppliers to treat all workers equally and fairly. Suppliers may not practice any form of discrimination – in particular with regard to salary, recruitment, access to training, promotion, maternity protection and dismissal – based on criteria of sex, race or ethnic origin, religion, age, disability, sexual orientation, political affiliation, trade union membership, nationality, gender identity, ancestry or social origin.

FREEDOM OF ASSOCIATION

The ATEQ supplier must strive to implement internationally recognized standards, such as ILO conventions, without violating national law. It must ensure that its employees and representatives, including temporary (agency) workers, have an open voice within their company on any issue related to their working conditions. Intimidation, threats or discriminatory practices against employee representatives are prohibited.

HEALTH AND SAFETY AT WORK

In accordance with the Labor Code, ATEQ suppliers are required to provide their employees with a safe and healthy work environment to prevent accidents, personal injury or exposure to danger related to or resulting from their work, including during the use of equipment, chemicals or during work-related travel.

ATEQ's suppliers are required to implement procedures and training or awareness to detect, avoid and mitigate as much as possible any hazards that pose a risk to the health, hygiene and safety of personnel. Suppliers are required, as a minimum, to comply with all applicable local and international laws and regulations in this regard. Health and safety guidelines must be in place and widely communicated. Workers' compliance with these guidelines should be regularly assessed. Workers must be provided with protective equipment appropriate to their activities.

2. COMPLIANCE AND ENVIRONMENTAL PERFORMANCE

ENVIRONMENTAL PROTECTION

ATEQ implements an environmental strategy and takes concrete actions to protect the environment within the framework of ISO14001 certification, which includes cooperation with its suppliers to ensure that best practices are applied throughout the supply chain.

ATEQ's suppliers must :

- act in accordance with national and international environmental laws and regulations in their most demanding form, in particular for the ROHS and WEEE directives (as described in the ATEQ General Purchasing Conditions),
- Ensure safe chemical management, chemical compliance of products and raw materials with applicable national and international regulations, including REACH regulations.
- Minimize its negative environmental impacts and implement measures contributing to the protection of the environment.
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- Minimize or avoid all hazardous air emissions, energy consumption and CO2 emissions.
- To ensure permanent technological monitoring to implement the most ecological techniques.

ATEQ is committed to an eco-design approach, as a result, its suppliers undertake to develop products and services with low energy consumption, which generate a reduction in CO2 emissions throughout the life cycle.

ATEQ requires its suppliers to comply with applicable local and international environmental laws, regulations and professional standards. They must also be able to demonstrate effective implementation of requirements and share environmental data when necessary.

RESPONSIBLE MANAGEMENT OF NATURAL RESOURCES AND WASTE

When sourcing or producing products, ATEQ suppliers must:

- Limit their use of natural resources to minimize their impact on the environment.
- Provide the rate of recycled materials that goes into the constitution of each product marketed at ATEQ.
- Encourage its suppliers and sub-suppliers to trace the provenance of minerals from conflict zones. They must therefore promote the transparency of its entire supply chain and put in place measures to this end. These measures aim to guarantee traceability, the sharing of information concerning the origin, and the compliance of raw materials and substances used.
- Limit or avoid the use of scarce resources as much as possible.
- Strive to reduce waste production.
- Identify, control and treat the waste produced by all of its activities. Waste treatment must comply with applicable environmental laws.

3. BUSINESS INTEGRITY AND ETHICAL REQUIREMENTS

ATEQ suppliers are required to comply with all laws and regulations in force in all countries in which their commercial activities are carried out or from which goods or services are supplied to ATEQ.

RESPECT FOR COMPETITION

ATEQ suppliers undertake to:

- Take all appropriate measures to prevent abuse of a dominant position, concerted practices or illicit agreements between competitors, such as the fixing of prices or price ranges or the sharing of markets.
- Respect the principles of fair competition. Thus, they are required to comply with existing laws that support and encourage competition, in particular the applicable antitrust laws as well as the laws regulating competition.

PREVENTION OF CONFLICTS OF INTEREST

ATEQ requires its suppliers to undertake to make every effort to prevent the occurrence of situations creating a real, apparent or potential conflict of interest which could generate risks of corruption within the framework of their business relations with any entity of the ATEQ Group.

MONEY LAUNDERING PREVENTION

ATEQ suppliers must take all necessary measures to prevent money laundering within their sphere of influence.

Each payment made must be supported by appropriate documentation clearly indicating the purpose of the payment and its due date.

ATEQ expects its suppliers to undertake to do business only with reputable suppliers, customers and other business partners who operate legally and whose funds come from legitimate sources.

ANTI-CORRUPTION, GIFTS AND INVITATIONS

ATEQ applies to a zero-tolerance policy regarding corruption and trading in influence. ATEQ expects its suppliers to take appropriate measures to prevent, detect and punish any acts that directly or indirectly involve bribery or trading in influence within the scope of their activities. This includes the prohibition of so-called facilitation payments and any other advantages granted to personnel in return for the performance of routine actions.

CONFIDENTIALITY: INTELLECTUAL PROPERTY AND TRADE SECRETS

Intellectual property rights must be scrupulously respected by suppliers. The transfer of know-how and technology must be carried out in a way that offers sufficient protection of intellectual property rights. ATEQ suppliers and their employees are obliged to protect trade secrets. They therefore undertake to take all necessary steps to ensure the confidentiality of trade secrets and other non-public information communicated in the course of their business relations with ATEQ.

SECURITY AND DATA PROTECTION

ATEQ requires its suppliers to comply with applicable data protection laws and regulations, as well as any specific data protection and security requirements.

CONFLICT MINERALS

Suppliers are required to provide sufficient assurances that minerals known as "conflict minerals" such as tantalum, tin, tungsten and gold ; and "extended minerals" such as cobalt, mica, Copper, Graphite, Lithium and Nickel in products sold to ATEQ do not directly or indirectly fund or benefit armed groups that commit serious human rights abuses in the Democratic Republic of Congo or a neighboring country, (See also Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act on the use of conflict minerals). Due diligence must be exercised regarding the source and chain of custody of such minerals. Information on the steps taken must be made available to ATEQ upon request.

COMPLIANCE WITH CUSTOMS REGULATIONS

ATEQ requires its suppliers to comply with all applicable customs legislation, including those concerning imports and the prohibition of transshipment of goods in the country of import.

TRADE RESTRICTION AND INTERNATIONAL SANCTION

ATEQ requires its suppliers to comply with all international trade restrictions and sanctions, as they evolve, as well as import and export control laws and regulations.

PUBLIC STATEMENTS

ATEQ suppliers must be vigilant about their public statements, particularly on the Internet and social networks. They must ensure that their statements are not attributed to any entity of the ATEQ Group or their shareholders, directors, officers or employees, that they comply with the suppliers' commitment to confidentiality and that they respect professional secrecy.

TRANSPARENCY OF INFORMATION

Suppliers must provide clear and accurate information about the methods and resources used, production sites and characteristics of the products or services provided and must refrain from making any misleading claims.

4. MONITORING APPROACH

ATEQ expects a clear commitment from its suppliers to this Code of Conduct. The supplier is required to prepare and maintain appropriate documentation to demonstrate compliance with this Code of Conduct. In order to ensure sustained compliance, ATEQ applies the following methods that are incorporated into its approach to supplier management.

The degree to which compliance with this Code of Conduct is monitored depends on the extent and nature of the business relationship and the service and risk profile of the supplier with respect to the requirements set forth in this Code of Conduct.

SELF-EVALUATION

ATEQ expects each of its suppliers to carry out a self-assessment regarding quality, safety, environment and social issues, based on a survey.

The supplier must answer the questionnaire when invited to do so and within four weeks of receiving the questionnaire sent by ATEQ.

ATEQ may be required to audit its suppliers on compliance of the present code of conduct.

PRODUCTION OF CERTIFICATES AND REGISTRATIONS

The supplier is obliged to produce, at ATEQ's request, all certificates and records related to its business activities. ATEQ guarantees that all information provided will remain confidential.

5. LACK OF CONFORMITY

CORRECTIVE MEASURES

In the case that non-compliance with the requirements of this Code of Conduct, ATEQ and the supplier shall agree on corrective actions to be implemented within an appropriate timeframe. As part of ATEQ's approach to managing its suppliers, all agreed-upon actions shall be closely monitored until final resolution.

Thus, full compliance with the Code of Conduct and the appropriate implementation of countermeasures in case of violation are part of the development, evaluation and qualification process of its suppliers.

RIGHT TO TERMINATE

ATEQ reserves the right to terminate the business relationship, including any subordinate agreements for deliveries or services, in the event of:

- serious non-compliance with the rules set forth in this Code of Conduct,
- persistent non-compliance with the rules set forth in this Code of Conduct following the failure to implement the corrective measures mentioned in the preceding paragraph.

Before exercising the right to terminate, ATEQ shall set a suitable deadline for remedying the non-compliance, unless the non-compliance is so serious that ATEQ cannot reasonably be expected to remain bound by the contract in question any longer. In the latter case, ATEQ has the right to terminate the contract with immediate effect.

Termination may extend to the entire business relationship or only to parts of it, at ATEQ's discretion.

6. CERTIFICATE OF CONFORMITY

In order to enter into a business relationship with ATEQ, the following supplier certifies that it will comply with this Code and its requirements.

The(day)..... (month),..... (year)

Supplier's name:.....

Supplier's address :.....

.....

DUNS Code :.....

Intracom VAT number:

SIRET NUMBER:

Name and title of supplier's representative:.....

Signature of supplier's representative:.....

Company stamp

7- Références

Les documents suivants ont été utilisés lors de la préparation du présent Code de Conduite et pourraient être utiles à titre de référence et de source en complément d'informations.

Les principes directeurs de l'OCDE à l'intention des entreprises et des multinationales.

(www.oecd.org)

Convention internationale des droits de l'enfant_UNICEF

(<https://www.unicef.fr/convention-droits-enfants/>)

Recueil de directives pratiques sur les initiatives pour des minerais responsables

(www.responsiblemineralsinitiative.org)

Recueil de directives pratiques sur la sécurité et la santé de l'OIT

(www.ilo.org)

Normes internationales du travail de l'OIT

(www.ilo.org/dyn/normlex/en)

ISO 14001

(www.iso.org)

OHSAS 18001

(www.iso.org)

REACH – Enregistrement, évaluation, autorisation et restriction des produits chimiques –
Règlement n° 1907/2006 de l'Union européenne

(http://ec.europa.eu/enterprise/sectors/chemicals/documents/reach/index_en.htm)

RoHS – Limitation des substances dangereuses – Directive 2011/65/UE de l'Union européenne

(<http://ec.europa.eu/enterprise/policies/european-standards/>

harmonised-standards/restriction-of-hazardous-substances/index_en.htm)

Restriction de circulation ou interdiction de certaines marchandises

([HTTPS://WWW.DOUANE.GOUV.FR/FICHE/RESTRICTION-DE-CIRCULATION-OU-INTERDICTION-DE-CERTAINES-MARCHANDISES.](https://www.douane.gouv.fr/fiche/restriction-de-circulation-ou-interdiction-de-certaines-marchandises))



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