



CSR AND ETHICS CHARTER FOR SUPPLIERS AND SUBCONTRACTORS OF THE TRIGANO GROUP

INTRODUCTION

Sustainable development is an important component of the Trigano strategy in order to anticipate and respond to environmental, social and regulatory changes.

Trigano is a group of companies which respect those who use their products, those who produce them, the environment, and the economic and societal backdrop against which they evolve. In that context, Trigano has published an Ethics Charter which sets out its professional ethics values ([Trigano Ethical Charter](#)) and which is binding on it and on its subsidiaries.

The Procurement function is an important component of sustainable development. Trigano has established long-term partnerships with its suppliers and subcontractors and requires them to follow the principles defined in this CSR and Ethics Charter.

PRINCIPLES

Trigano requires its suppliers and subcontractors to comply with the Universal Declaration of Human Rights, the conventions of the International Labour Organization (ILO), and the Organisation for Economic Cooperation and Development (OECD) Guidelines, as well as any other applicable international or national convention or regulation. In the event where the principles described in this Trigano CSR and Ethics Charter are more exacting, they shall prevail. Trigano may ask its suppliers and subcontractors to demonstrate compliance with these principles at any time.

1. HUMAN RIGHTS

Trigano's suppliers and subcontractors must adhere to the following principles:

- Absolute ban on employment of children under the age of sixteen outside the legal school setting;
- Ban on illegal or forced labour;
- Ban on any discrimination linked notably to age, sex, ethnic origin, religion or political convictions;
- Respect for the employment legislation on working hours, rest and minimum wage;
- Freedom of expression, association and to join trade unions in compliance with the applicable legal provisions.



2. ETHICS

Anti-corruption: the Trigano General Management has always undertaken to advocate and defend the values of professional integrity everywhere it does its business, and to combat all forms of corruption. A code of conduct has been published by Trigano on this subject: [Anticorruption - Code of conduct](#).

Trigano prohibits any bribe, unjustified commission to intermediaries, facilitation payment to administrations, and influence peddling. Trigano requires its suppliers and subcontractors to respect those bans.

Gifts and invitations: suppliers and subcontractors must not offer gifts or invitations to Trigano's employees, which could influence the independence of the professional relationship.

Conflicts of interest: a conflict of interest may arise between a Trigano employee and a supplier or a subcontractor in which that employee may have an interest, whether direct or indirect. The suppliers and subcontractors must ensure that their decisions in respect of Trigano are not influenced by any conflict of interest.

In such a situation, the supplier or subcontractor is bound to inform Trigano, which shall rule on the terms of continuation of the commercial relationship.

Competition law: Trigano, its suppliers and its subcontractors operate in a competitive economic situation regulated by commercial laws. As a matter of principle, all partners must be treated fairly, by complying with and ensuring compliance with the provisions of said customs and laws. It is notably prohibited to conspire with competitors or colleagues on a price increase, a supply limitation, a collusion to bid on competitive tenders, or an exclusion of a competitor. Trigano's suppliers and subcontractors undertake to abide by these rules.

Data protection: all suppliers and subcontractors are bound to respect the laws and regulations on the collection, processing and storage of personal data in the context of the services provided to Trigano.

3. ENVIRONMENT

Trigano's suppliers and subcontractors must abide by the laws and regulations in force on the environment, and undertake to reduce the environmental impact of their activities, notably through:

- Preserving natural resources;
- Limiting waste, and treating it with environmentally friendly solutions;
- Complying with the legislation on hazardous substances: European Union Regulations (EC) no. 1907/2006 REACH and no. 2102/2017 RoHS.



4. HEALTH AND SAFETY IN THE WORKPLACE

Trigano's suppliers and subcontractors undertake to take the necessary measures to ensure the health, safety and hygiene of their employees in the workplace, and generally to guarantee working conditions in compliance with the legislation in force.

REPORTING PROCEDURE

Trigano's suppliers and subcontractors may use the Trigano reporting procedure ([Whistleblowing systems](#)) if they suspect a serious and blatant breach of the law or a regulation, or a threat or serious harm to the public interest, notably in the matter of :

- Corruption and influence peddling (particularly any behaviour or situation contrary to the rules set out in the Anti-Corruption Code of Conduct or the Trigano Ethics Charter);
- Risks relative to serious infringements of human rights and fundamental freedoms, health and safety, and the environment, resulting from the activities of the company or of its subcontractors or suppliers.

This procedure must be used with respect for the applicable laws and regulations in the country where the person wishing to submit the report lives or works.

APPLICATION

This CSR and Ethics Charter must be formally validated by Trigano's suppliers and subcontractors.

Trigano requires its suppliers and subcontractors to undertake to pass on the principles laid down in this Charter to its own suppliers and subcontractors.

In accepting this Charter, the Trigano supplier or subcontractor agrees to be audited by Trigano (or an organisation mandated by it) regarding respect for the application of this Charter.