

Supplier

Code of Conduct

2024



Coexya

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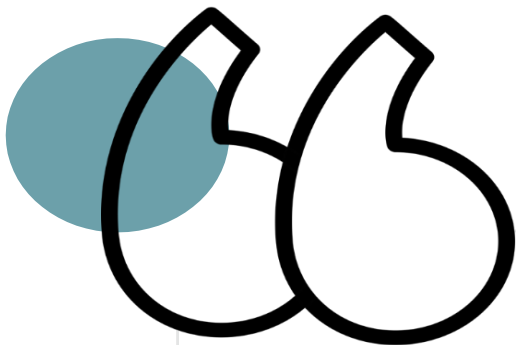


COEXYA
Connect skills, create more

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1 | PRESIDENT'S MESSAGE



At Coexya, we are all driven by the same conviction: our role is both economic and societal. We act daily to build our future and a society that we fervently wish to be more responsible and sustainable.

This approach is part of our DNA and our values. It is reflected in our daily practices as well as in our individual and collective commitments.

As suppliers, you play an important role in our daily development. Aligning our aspirations will contribute to our mutual success. That is why we want to share with you our commitments regarding sustainable development and ethics.

With the same spirit as our Ethical Charter shared with our employees, this Code of Conduct presents the CSR commitments to which we wish to associate you in order to continue together our progress towards ever more sustainable and ethical practices.

Philippe Le Calvé

President of Coexya Group

2 | INTRODUCTION

This **Supplier Code of Conduct** formalizes the commitment of the Coexya Group regarding sustainable development and ethics standards. Consistent with our CSR roadmap, our ethical charter, and our values, this Code of Conduct expresses our desire to reinforce our requirements and expectations towards our suppliers.

Commitment to respecting the principles outlined in this Code of Conduct is essential for establishing high-quality and sustainable business relationships. By adhering to this code, our suppliers demonstrate their commitment to respecting high standards in sustainable development, human rights protection, and business ethics.

Our suppliers play a key role in our ambition for sustainable and responsible growth. The adoption of responsible practices and commitment to a continuous improvement process are essential to ensure sustainable and reliable supplies in the long term while contributing to the creation of shared value.

Thus, this Code of Conduct will develop five themes:

- 🌐 Global commitments
- 🌐 Social and Societal commitments
- 🌐 Environmental commitments
- 🌐 Ethical commitments
- 🌐 Reciprocal commitments

3 | GLOBAL COMMITMENTS

WE SUPPORT



3.1. The 10 principles of the United Nations

Since 2011, Coexya has been committed to the United Nations Global Compact, an international initiative for corporate social responsibility, and to respecting its [10 principles relating to human rights](#), labor standards, the environment, and anti-corruption. As a signatory of the UN Global Compact, we are convinced of the importance of these principles and encourage our suppliers and partners to follow them as well.

Human Rights:

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights;

Principle 2: Make sure that they are not complicit in human rights abuses.

Labor Standards:

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: The elimination of all forms of forced and compulsory labor;

Principle 5: The effective abolition of child labor;

Principle 6: The elimination of discrimination in respect of employment and occupation.

Environment:

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: Undertake initiatives to promote greater environmental responsibility;

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption:

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

3.2 Sustainable Development Goals (SDGs)

By integrating the SDGs, we have chosen to develop into our Supplier Code of Conduct, we encourage our suppliers to identify the SDGs to which they contribute most significantly and to work together to achieve these common goals.



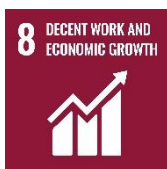
Coexya is committed to 4 SDGs in particular:



SDG No. 3 – Good health and well-being

We believe that the well-being of our employees in the company is an essential condition for ensuring their professional and personal fulfillment. We offer a hybrid work organization in a healthy, secure, and pleasant work environment by providing modern and efficient equipment.

We have also implemented preventive actions to best ensure the safety of our employees.



SDG No. 8 – Decent work and economic growth

At Coexya, we believe that economic growth can only be sustainable if it is shared and equitable for all. Value creation relies on the ability to reinvent and create new offerings.

SDG No. 8 "Decent Work and Economic Growth" illustrates our business strategy. Thus, we are committed to supporting the development of our employees by investing in their training, promoting their professional development, and contributing to local economic growth.

Ethics and responsibility are at the heart of our business policy, and we support the startups of tomorrow through our incubator "Le Connecteur."



SDG No. 9 – Industry, Innovation and Infrastructure

Our company is committed to responsible innovation to contribute to sustainable economic and environmental development.

We encourage everyone's ability to reinvent and experiment. Thus, we develop our culture of innovation and technical expertise to offer, for example, customized business solutions such as the digitization of intellectual property processes, the digitalization of the medical and hospital sector, or the improvement of industrial performance through Industry 4.0.

We also rely on advanced technologies such as RPA, blockchain, sovereign cloud, AI, or IoT to add value to the solutions offered to our clients. Our approach and experience ensure the quality, security, transparency, and efficiency of our projects.



SDG No. 12 – Responsible consumption and production

At Coexya, we are committed to sustainable production and consumption by adopting eco-responsible practices at all levels of our organization.

We work to reduce our ecological footprint by optimizing the environmental management of our buildings, encouraging sustainable mobility, and ensuring responsible resource management.

We also encourage our stakeholders to adopt sustainable and responsible practices while promoting an eco-responsible corporate culture by raising awareness among our employees about the challenges of sustainable development.

4 | SOCIAL AND SOCIETAL COMMITMENTS

We believe that a sustainable company is based on principles of integrity, responsibility, and respect for human rights. We are deeply committed to creating a positive impact in the communities where we operate and to promoting fair and equitable working conditions.

By relying on internationally recognized standards such as those established by the International Labour Organization (ILO) and other international conventions, we aim to establish responsible and sustainable business practices.

This Code of Conduct reflects our commitment to protecting workers' rights, preventing exploitation, and promoting a safe and inclusive working environment. By working together, we can help shape a future where working conditions and equal opportunities are at the heart of our daily activities.

4.1 Remuneration and working hours

In the case of activity in France, we ask our suppliers to comply first with French law regarding working hours and remuneration. Then, where applicable, as for all activities outside France, to comply with international standards such as those of the International Labour Organization.

We also ask to comply with all legal requirements regarding social benefits and to guarantee all their employees the benefits provided in any collective agreement, company agreement, and any other applicable individual or collective agreement.

Working hours are regulated at different levels, and this charter, as well as the commitment of our suppliers, aims to respect these regulations while not exceeding the maximums set by internationally recognized standards such as those of the ILO.

[The ILO Convention No. 1 on working hours](#) and [Convention No. 30 on working hours in commerce and offices](#) are also applicable in this matter.

4.2 Child labour and forced labour

We ask our suppliers to respect international standards on child labour and forced labour such as [ILO Convention No. 182 on the worst forms of child labour](#) and [Convention No. 105 on the abolition of forced labour](#).

Our suppliers must prohibit the employment of persons who have not reached the minimum working age in their operations in any country. They can only employ

young people under the age of 18 in specific cases permitted by local legislation and in jobs that do not jeopardise their health or safety.

Forced or compulsory labour, slavery, or any other practice akin to servitude or involuntary labour as defined in the ILO's core conventions are strictly prohibited.

4.3 Discrimination

We are committed to treating all our employees with respect and fairness by promoting equal opportunities in all aspects of employment in accordance with the principles set out in the ILO's core conventions, including [Convention No. 111 on Discrimination](#) (Employment and Occupation) and [Convention No. 100 on Equal Remuneration](#).

We encourage our suppliers to comply with the laws and regulations in force in their country regarding anti-discrimination and to adopt proactive policies to promote equal opportunities and diversity.

We do not accept any form of discrimination, whether direct or indirect, intentional or not. Neither social or ethnic origin, sex, age, family situation, sexual orientation, genetic characteristics, nationality, surname, political opinions, trade union activities, religious beliefs, physical appearance, state of health, disability, nor pregnancy can be grounds for discrimination.

We ask all our suppliers to respect these principles and to adopt a similar policy on anti-discrimination and fairness towards their employees. We reserve the right to terminate any business relationship with suppliers who do not respect these fundamental principles.

4.4 Freedom of association and collective bargaining

We recognise the right of our employees to freedom of association, the right to organise, and collective bargaining in accordance with the laws and regulations in force as well as the ILO's core conventions that set out these rights.

Our suppliers are required to respect these same rights and to allow their employees to freely exercise their right to organise, join trade unions, and bargain collectively. They must also comply with all laws and regulations in force regarding freedom of association and collective bargaining.

4.5 Health and safety

At Coexya, the health and safety of our employees and subcontractors are absolute priorities.

We are committed to ensuring a healthy, safe, and favourable working environment for everyone's quality of life. We ensure compliance with all applicable health and safety laws and regulations as well as recognised best practices in this area.

Similarly, we expect our suppliers to share this concern for the health and safety of their employees and subcontractors. They must commit to implementing and maintaining safe and healthy working conditions in accordance with the standards in force in their country and to respect the best practices in terms of health and safety.

We also ask our suppliers to ensure that employees have access to appropriate information and training on the health and safety risks related to their work. We want our suppliers to adopt a proactive approach to identifying risks and taking the necessary measures to prevent or eliminate them. Finally, we encourage our suppliers to promote a culture of safety and to create a working environment where safety is considered a fundamental value.

Regarding applicable standards and laws, we refer in particular to [ILO Convention No. 155 on occupational health and safety](#) and [ILO Convention No. 187 on the promotional framework for occupational safety and health](#).



4.6 Harassment

It is crucial that our suppliers respect the fundamental rights of all their employees, including the right to a work environment free from harassment. Workplace harassment can have serious consequences for the individuals concerned.

We therefore expect our suppliers to commit to fighting harassment by implementing preventive and corrective measures and ensuring that all allegations of harassment are taken seriously and handled confidentially and appropriately.

It is also important that our suppliers provide regular training to their employees on harassment prevention and reporting procedures and that they provide means to report any inappropriate behaviour safely and confidentially.

It is important to note that harassment legislation varies by jurisdiction, but there are relevant international standards such as the [Convention on the Elimination of All Forms of Discrimination Against Women](#) (CEDAW), the [Convention on the Rights of the Child](#) (CRC), and the [Convention on the Elimination of All Forms of Racial Discrimination](#) (CERD) that can serve as references.

Moreover, the ILO has adopted several conventions and recommendations related to workplace harassment. [ILO Convention No. 190 on Violence and Harassment](#), adopted in 2019, sets minimum standards for preventing and combating violence and harassment at work, including sexual harassment and gender-based harassment.

5 | ENVIRONMENTAL COMMITMENTS

Coexya is committed to sustainability and environmental protection. We consider environmental requirements as a core pillar of our business and strive to comply with regulations while exceeding minimum requirements.

We firmly believe that preserving the environment is a collective responsibility and we are committed to acting responsibly at all levels of our activity. This environmental policy is based on sustainable practices, responsible resource management, reducing greenhouse gas emissions, promoting a sustainable supply chain, and waste reduction.

By adopting these environmental requirements, we strive to actively contribute to protecting our planet for present and future generations.

5.1 Compliance with current regulations

Coexya places great importance on compliance with current environmental regulations. We are committed to complying with all applicable laws, regulations, and standards in the countries where we operate. This includes, but is not limited to, regulations concerning environmental protection, waste management, conservation of natural resources, and pollution prevention.

We are committed to closely monitoring legislative and regulatory developments in these areas and adapting our practices accordingly to ensure continuous compliance.

We ask our partners and suppliers to also comply with these environmental regulations in their respective countries and to provide us with the necessary documents and proof demonstrating their compliance.

5.2 Reduction of Greenhouse Gas (GHG) emissions

We are fully aware of the major challenges related to climate change and the importance of reducing GHG emissions. Therefore, we implement concrete strategies aimed at minimising our carbon footprint and contributing to the fight against global warming. This involves adopting sustainable practices, technological innovations favouring energy efficiency, reducing energy consumption, providing electric vehicle and bicycle fleets for our employees, and using renewable energy sources.

We are also committed to raising awareness among our employees, suppliers, partners, and customers about the importance of reducing GHG emissions. We encourage training and education on environmental sustainability to promote responsible practices and develop a corporate culture focused on environmental preservation.

By working closely with our suppliers, we seek to establish sustainable partnerships and promote environmentally responsible supply chains. We also expect our suppliers to share our commitment to reducing GHG emissions and to implement appropriate measures to achieve this.

By adopting these measures, we actively contribute to the transition to a low-carbon economy and the preservation of our planet for future generations. We monitor and evaluate our environmental performance by conducting carbon assessments for the group's historical scope and our new acquisitions to identify new opportunities for improvement and progress constantly towards our GHG reduction targets.

We ask our suppliers employing more than 250 people to provide us with a carbon assessment every two years.

We ask our suppliers employing fewer than 250 people to detail their internal approach to reducing GHG emissions annually.

5.3 Promotion of a sustainable supply chain

We are committed to promoting a sustainable, environmentally respectful, and socially responsible supply chain. We encourage our suppliers to adopt sustainable practices throughout the supply chain. This includes selecting suppliers who share our values in terms of sustainable development, business ethics, and compliance with environmental and social standards.

We urge our suppliers to implement initiatives aimed at reducing the environmental footprint of their operations, including promoting energy efficiency, optimising resource use, reducing GHG emissions, and promoting responsible waste management. We encourage the adoption of best sustainability practices, such as using recycled materials, promoting the circular economy, and relying on renewable energy sources.

5.4 Waste reduction and recycling optimisation

Coexya is committed to reducing waste and optimising recycling within its operations and supply chain. We recognise the importance of conserving natural resources and minimising the environmental impact of our activities.

We encourage our suppliers to adopt responsible waste management practices by favouring source reduction, reuse, and recycling. We also encourage adopting technologies and processes that limit waste production, optimise material use, and promote the circular economy.

We ensure compliance with current regulations on waste management and strive to go beyond these minimum requirements. We urge our suppliers to comply with applicable environmental standards and implement effective recycling programmes to reduce landfill waste and promote its recovery.

We are committed to measuring and tracking our performance in waste reduction and recycling optimisation on sites where this action is measurable.

We ask our suppliers employing more than 250 people to present their waste reduction policy once a year.

6 | ETHICAL COMMITMENTS

We believe that ethics and integrity are fundamental values in all our business interactions. This section of our Code of Conduct addresses essential areas such as preventing conflicts of interest, respecting competition law, confidentiality and personal data protection, anti-corruption and anti-money laundering, and transparency of information and reporting.

We affirm our commitment to ethics, integrity, and transparency through the detailed axes below, thereby contributing to creating a fair and respectful business environment in accordance with applicable legal and ethical standards.

We expect our suppliers to share our values and comply with these ethical requirements, ensuring fair, transparent, and integral business relationships.

6.1 Conflicts of interest

We place paramount importance on eliminating conflicts of interest and promoting ethical and integral conduct. We ask our suppliers to inform us of any conflict of interest, even apparent, and to refrain from practices based on personal interests.

Conflicts of interest can compromise the objectivity and fairness of our business activities and harm our reputation. Therefore, we ask our suppliers to comply with high standards for detecting, disclosing, and managing conflicts of interest.

Under applicable laws and regulations, notably the [French Civil Code](#) and the [French Commercial Code](#), legal entities must act in the social interest and avoid conflicts of interest that could undermine this interest. Additionally, the principles and recommendations set out in the [French Financial Markets Authority's](#) (AMF) Corporate Governance Code for listed companies also underscore the importance of transparency and conflict of interest management.

To ensure proper management of conflicts of interest, we encourage our suppliers to implement internal policies and procedures to identify, assess, and manage potential conflicts. This may include regularly disclosing stakeholders' personal and financial interests, separating responsibilities, and establishing objective and independent decision-making mechanisms.

We aim to establish an environment of trust and integrity where the interests of all stakeholders are considered fairly and transparently.

6.2 Compliance with competition law

We are committed to respecting competition law and promoting healthy and fair competition among economic actors. We expect our partners and suppliers to comply with all applicable competition laws designed to ensure fair competition and prevent anti-competitive practices.

Our suppliers must respect the principles and provisions of antitrust and competition laws, which may vary depending on the countries where we operate.

These laws generally prohibit anti-competitive practices such as illegal agreements, abuse of dominant position, predatory or discriminatory pricing practices, and mergers or acquisitions that could harm competition.

By collaborating with suppliers who respect these principles, we foster a culture of fair and ethical competition. We also encourage our suppliers to implement internal policies and procedures to comply with competition law, such as antitrust compliance programmes and regular training to raise their employees' awareness of these issues.

We contribute to creating a balanced business environment where competition is stimulated, and companies can thrive based on their merits and competitive advantages in compliance with applicable laws.

6.3 Confidentiality and personal data protection

We place great importance on confidentiality and the protection of sensitive information. We expect our suppliers to take all necessary measures to ensure that any non-public information remains strictly confidential.

The confidentiality of information is governed by specific laws and regulations aimed at protecting intellectual property rights, trade secrets, and personal data. Among the most commonly applied legislation is the [European Union's General Data Protection Regulation](#) (GDPR), which imposes strict standards for the confidentiality of personal data.

Our suppliers must comply with these laws and regulations and with the confidentiality agreements between the parties. They must implement internal policies and procedures to protect the confidentiality of sensitive information, such as access controls, IT security measures, and training to raise their employees' awareness of the importance of confidentiality.

We are also committed to respecting confidentiality in the use of our customers' data and information. We implement appropriate security measures to protect the

data we collect, store, and process. Moreover, we comply with data privacy laws and regulations to ensure our customers' confidentiality and data protection rights.

By collaborating with suppliers who share our commitment to confidentiality, we ensure the protection of sensitive information and the trust of our customers. We ensure that our activities comply with confidentiality standards, thereby contributing to preserving data and information confidentiality in our services and business relationships.

6.4 Anti-corruption and anti-money laundering

Coexya is firmly committed to fighting corruption, money laundering, and wrongful conduct in the countries where we operate. We categorically condemn acts of corruption such as soliciting or accepting bribes, abuse of power, embezzlement, and favouritism. We consider any form of gift, invitation, or advantage offered or received during a call for tenders, customer or supplier relationship as a form of corruption and strictly prohibit it.

Therefore, we expect our suppliers to reject any form of corruption, including facilitation payments, in all business transactions. We only collaborate with suppliers who share our values of integrity and who commit to respecting the same principles. We ask our partners and suppliers to ensure that their policies and practices regarding gifts, invitations, and advantages comply with the law, ethics, and acceptable business practices and do not influence business decisions.

Furthermore, we ask our suppliers to guarantee the lawful origin of funds in their business activities by complying with all applicable anti-money laundering and anti-terrorist financing laws, rules, and regulations. We encourage our suppliers to implement rigorous procedures to verify funding sources and prevent involvement in illegal activities.

6.5 Transparency of information and reporting

We attach great importance to the transparency of information and reporting. We commit to providing clear, complete, and accurate information to our stakeholders in compliance with applicable standards and regulations. We firmly believe that transparency fosters mutual trust and strengthens sustainable business relationships.

As part of our commitments, we ask our suppliers to share with us the necessary information to ensure transparent communication and effective monitoring. This includes disclosing their policies, practices, performance, and key indicators related

to areas such as the environment, human rights, occupational health and safety, and other relevant aspects of our collaboration.

At Coexya, transparency and reporting are fundamental pillars of our commitment to sustainability and corporate responsibility. We comply with financial information disclosure laws and regulations, including **International Financial Reporting Standards** (IFRS) or **Generally Accepted Accounting Principles** (GAAP), depending on the geographical context. We ensure that our financial reports are reliable, accurate, and compliant with legal requirements and best practices in financial transparency.

By working together, sharing relevant information, and establishing appropriate reporting mechanisms, we strengthen mutual trust, promote collective responsibility, and contribute to better corporate governance. This transparency allows us to make informed decisions, measure our progress, and identify areas for improvement while enabling us to account for our positive impact on society and the environment.

7 | RECIPROCAL COMMITMENTS

Coexya

We hereby confirm our desire to:

- ☉ Share our Corporate Social Responsibility approach with our suppliers and partners.
- ☉ Continuously promote transparency, dialogue, and sharing of best practices to encourage continuous improvement in the practices of our suppliers and partners and their own service providers and suppliers in sustainable development in the areas mentioned in this document: environment, social/societal, and business ethics.
- ☉ Be available to answer our suppliers' and partners' questions and help them implement their CSR progress plan.

Name of the company: Coexya Group

Name and function of the representative: Philippe Le Calvé, President

Signature:

COEXYA GROUP SAS
9 avenue Charles de Gaulle
69771 Saint-Denis-au-Mont d'Or Cedex
Tel. : +33 (0)4 72 65 37 40
RCS Lyon 411 992 240



The supplier:

We hereby confirm:

- ☉ We have received and fully understood Coexya's Supplier Code of Conduct.
- ☉ We commit to the principles mentioned therein and to their effective implementation.
- ☉ For all companies employing more than 250 people: communication of the CSR report, if applicable, any rating/label/certification CSR document, and a carbon assessment every two years to attest to the commitment to sustainable development.
- ☉ For all companies employing fewer than 250 people: Provide a detailed CSR report, when it exists, and/or a document detailing the actions undertaken, any rating/label/certification CSR, and/or a carbon assessment to attest to their commitment to sustainable development.

Date:/...../.....

Name of the company:

Name and function of the representative:

Signature and company seal:

8 | REFERENCE TEXTS

8.1. The Universal Declaration of Human Rights

8.2. The 10 principles of the UN

8.3. The Sustainable Development Goals (SDGs)

8.4. International Labour Organization (ILO)

- C001 - Convention No. 1 on Working Hours, 1919
- C030 - Convention No. 30 on Working Hours (Commerce and Offices), 1930
- C087 - Convention No. 87 on Freedom of Association and Protection of the Right to Organise, 1948
- C098 - Convention No. 98 on the Right to Organise and Collective Bargaining, 1949
- C105 - Convention No. 105 on the Abolition of Forced Labour, 1957
- C100 - Convention No. 100 on Equal Remuneration, 1951
- C111 - Convention No. 111 on Discrimination (Employment and Occupation), 1958
- C155 - Convention No. 155 on Occupational Safety and Health
- C182 - Convention No. 182 on the Worst Forms of Child Labour (Articles 2, 3, 4, 5, and 6), 1999
- C187 - Convention No. 187 on the Promotional Framework for Occupational Safety and Health
- C190 - Convention No. 190 on Violence and Harassment (adopted in 2019)

8.2. International conventions

- Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
- Convention on the Rights of the Child (CRC)
- Convention on the Elimination of All Forms of Racial Discrimination (CERD)

8.3. Other reference texts

- French Civil Code
- French Commercial Code
- Corporate Governance Code for Listed Companies of the French Financial Markets Authority (AMF)
- Antitrust and competition legislation in the relevant countries
- General Data Protection Regulation (GDPR) of the European Union
- International Financial Reporting Standards (IFRS)
- Grenelle Law

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