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# CHARTER RESPONSIBLE PURCHASING FOR SUPPLIERS AND PARTNERS

Respecting ethics, sustainable growth and data protection

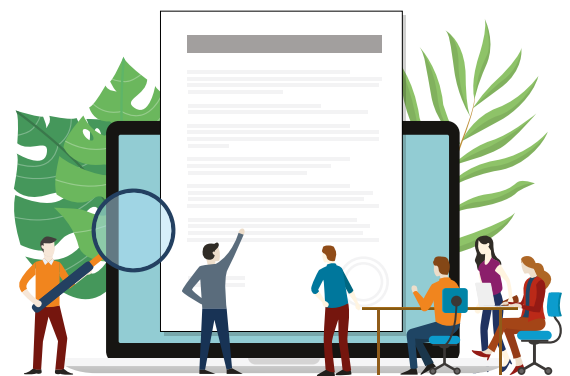
# RESPONSIBLE PURCHASING CHARTER FOR SUPPLIERS AND PARTNERS

The SYNERGIE Group uses suppliers and partners committed to a comprehensive CSR approach incorporating ethics, sustainable development and respecting the protection of the personal data of all its third parties (GDPR).

This choice requires coherence with its own commitments and a contribution to the virtual circles of an approach that must necessarily be collective to be effective. This approach is fully in keeping with the spirit of the Charter of the United Nations, to which the SYNERGIE Group adheres and makes its own declaration each year.

Becoming a SYNERGIE Group supplier or partner means sharing the values and objectives of this Charter and complying with all of its aspects.

Derogating from this might constitute a breach of contractual obligations, which might result in the termination of the contractual relationship if serious.



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# CORPORATE SOCIAL RESPONSIBILITY

The SYNERGIE Group has decided to exclusively use suppliers and partners who scrupulously respect (and whose own suppliers scrupulously respect) the Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and all the laws and regulations in force relating to corporate social responsibility.

## Elimination of forced and compulsory labour

Suppliers and partners must ensure that under no circumstance will they use forced labour, whether obtained under threat of punishment, by the retention of identification papers, by any form of security deposit on the part of workers, or any other constraint. These practices are strictly illegal.

## Harassment and abuse

The SYNERGIE Group expects its suppliers and partners to treat their employees with respect and dignity. Suppliers and partners will not accept, or practice, any form of corporal punishment, moral or physical harassment or any other form of abuse.

## Wages and benefits

As a minimum, suppliers and partners must pay a regular wage and pay overtime at the statutory rate imposed by the country in which they operate, and ensure that their workers benefit from the legal benefits in force. Wage deductions for disciplinary reasons are prohibited. Suppliers and partners must have in place a health and social welfare system in accordance with the applicable legal requirements.

## Union freedom and freedom of expression

The SYNERGIE Group expects its suppliers and partners to respect and acknowledge the right of each employee to collective bargaining, and to create or participate in a union organisation of their choosing without penalty, discrimination or harassment.

## Abolition of child labour

Suppliers and partners must be able to guarantee that they do not employ children under 16 years of age. In countries in which local legislation stipulates that the child must be older to work, or in which compulsory education is extended beyond 16 years, the oldest age will apply.

## Combating of discrimination and the promotion of diversity and equal opportunities

The SYNERGIE Group expects its suppliers and partners to observe equal and fair treatment between all employees. Suppliers and partners must not practice any form of discrimination in terms of hiring, access to training, promotion, redundancies based on origin, gender, pregnancy, physical appearance, health, morals, sexual orientation, age, political opinions, union activities, etc.

## Health and safety

Suppliers and partners must ensure a safe and healthy work environment so as to prevent accidents or bodily injury that might be caused by, connected with or occur during work or when handling equipment. They will implement systems to detect, prevent or neutralise any threat to the health and safety of personnel and comply with the local and international laws and regulations in force.

## Working hours and rest

In terms of working hours and overtime, suppliers and partners will comply with the limits imposed by the laws of the country in which they operate. They will grant all employees and partners a weekly rest period of at least 24 consecutive hours.

# ETHICAL RESPONSIBILITY

## Anti-corruption

Suppliers and partners must comply scrupulously with the laws and regulations combating corruption and influence peddling and notably the French “Sapin II” law of 9 December 2016 (no. 2026 – 1691) on transparency, the combating of corruption and the modernisation of the economy. With this in mind, the SYNERGIE Group makes available to all its third parties its Charter of Ethics and Business Conduct, bearing testament to its own commitment.

Where the size of their company requires it, suppliers and partners must comply with the 8 pillars of the Sapin law:

1. Drafting and adoption of a Code of Conduct that lists and illustrates the various types of conduct to be prohibited as potentially characterising acts of corruption or influence peddling.
2. Implementation of an internal whistleblowing system.
3. Establishment of a risk mapping.
4. Implementation of procedures to evaluate the situation of customers, first-tier suppliers and intermediaries in respect of the risk mapping.
5. Implementation of accounting control procedures.
6. Implementation of a training system for the people most exposed to risks of corruption and influence peddling.
7. Implementation of disciplinary measures to sanction employees if the company's Code of Conduct is violated.
8. Implementation of a system to control and evaluate the measures implemented.

**Suppliers and partners undertake to respect the SYNERGIE Group's gift policy and will not attempt, by any unlawful means, to influence the buyer of the SYNERGIE Group. With this in mind, they must not make any offer or promise or offer any gift or advantage securing a favourable decision for them.**

## Respect of healthy and fair competition

Suppliers and partners undertake to respect the laws and regulations protecting free and healthy competition.

They undertake not to participate in any illegal cartel on prices and, where applicable, not to abuse their dominant position.

Suppliers and partners and their employees must not use important or non-public information, obtained within the scope of the commercial relationship with the SYNERGIE Group, for speculative purposes.



# ENVIRONMENTAL RESPONSIBILITY

The SYNERGIE Group expects a measurable environmental commitment from its suppliers and partners, particularly in controlling the nuisances and pollution connected with their activity (production / buildings / vehicle fleet).

Suppliers and partners undertake to respect local and international environmental regulations and standards, and to use management systems specifically concerning the environment, health and safety (ISO 14001, ISO 4500, ISO 9001).

Where appropriate, they undertake to fulfil the obligations linked to the Tertiary Sector Decree (Elan law) and energy audits.

## Sustainable use of resources

Suppliers and partners undertake to use natural resources rationally and to prioritise renewable energies. They undertake to eliminate waste and to implement responsible practices at all levels of the company. This includes the promotion of a paperless society and the use of environmentally friendly technologies.

## Pollution and waste management

Suppliers and partners are committed to the responsible management of their waste. Waste should be managed according to the “3R” rule (Reduce, Reuse, Recycle). Waste and atmospheric emissions and discharges into water must be treated appropriately. Particular attention will be paid to hazardous waste and emissions, which must never be illegally dumped, released or discharged.





# RESPONSIBILITY FOR THE PROTECTION OF PERSONAL DATA AND THE SECURITY OF INFORMATION SYSTEMS.

Suppliers and partners and their sub-contractors undertake to respect Regulation (EU) no. 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, known as the General Data Protection Regulation (GDPR). They undertake to have a compliant policy and to having appointed a DPO (Data Protection Officer), where appropriate.

Suppliers and partners undertake to respect the legal and regulatory environment of their activity, based on an approach of continuous improvement inspired by the international information security management standard: ISO-IEC 27001.

Suppliers and partners undertake to immediately notify the SYNERGIE Group DPO in the event of the loss of personal data or any other incident falling within the scope of the GDPR in order to limit its consequences. If the supplier or partner works in the field of IT, and/or is likely to store and/or process the personal data entrusted to it for the purposes of providing its service, it will undertake to exhaustively and honestly complete the SYNERGIE Group GDPR security questionnaire and, where necessary, sign this partner charter.

## Approach of common improvement

The SYNERGIE Group wishes to embark with its suppliers, partners and sub-contractors upon an approach of common progress in order to identify the weak points of the purchasing process and desirable changes in terms of protecting the environment, human rights, working conditions, the respect of business ethics and the GDPR. The SYNERGIE Group wishes to develop with its third parties a Responsible Purchasing policy involving integration enterprises, adapted enterprises or enterprises situated in a priority neighbourhood of the city.

The SYNERGIE Group would like best practices to be exchanged, and for each supplier, partner and sub-contractor to disseminate this charter to its own suppliers and partners.

## Supplier/partner adherence form

I, the undersigned,

representing the company

confirm that after having familiarised myself with the SYNERGIE Group Gift policy ([read it here](#)) and after having familiarised myself with the Responsible Purchasing Charter for SYNERGIE Group Suppliers and Partners,

agree to adhere to its principles and to abide by them throughout our commercial relationship,

**Signature and company stamp**

Signed at

[date] | \_ \_ | \_ \_ | \_ \_ | \_ \_ | \_ \_

Please return this Charter, signed, to [synergie.rse@synergie.fr](mailto:synergie.rse@synergie.fr)

# SYNERGIE ADHERES TO THE 10 PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT



[www.un.org](http://www.un.org)

The 10 principles of the Global Compact are inspired by the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation, the Rio Declaration on Environment and Development and the United Nations Convention against Corruption.

Companies are asked to respect the following principles:

## Human rights

### Principle 1

Support and respect the protection of internally proclaimed human rights.

### Principle 2

Make sure they are not complicit in human rights abuses.

## International labour standards

### Principle 3

Uphold the freedom of association and recognise the right to collective bargaining.

### Principle 4

Contribute to the elimination of all forms of forced and compulsory labour.

### Principle 5

Contribute to the effective abolition of child labour.

### Principle 6

Contribute to the elimination of all discrimination in respect of employment and occupation.

## Environment

### Principle 7

Apply 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

Work against all forms of corruption, including extortion and bribery.

# SYNERGIE IS COMMITTED TO RESPECTING THE FUNDAMENTAL CONVENTIONS OF THE ILO

[www.ilo.org](http://www.ilo.org)

## Fundamental Conventions of the International Labour Organisation

**C029** - Forced Labour Convention (no. 29), 1930

**P029** - Protocol of 2014 to the Forced Labour Convention, 1930

**C087** - Freedom of Association and Protection of the Right to Organise Convention (no. 87), 1948

**C098** - Right to Organise and Collective Bargaining Convention (no. 98), 1949

**C100** - Equal Remuneration Convention (no. 100), 1951

**C105** - Abolition of Forced Labour Convention (no. 105), 1957

**C111** - Discrimination (Employment and Occupation) Convention (no. 111), 1958

**C138** - Minimum Age Convention (no. 138), 1973

**C182** - Worst Forms of Child Labour Convention (no. 182), 1999



Organisation  
internationale  
du Travail

## Priority governance conventions

**C081** - Labour Inspection Convention (no. 81), 1947

**P081** - Protocol of 1995 to the Labour Inspection Convention, 1947

**C122** - Employment Policy Convention (no. 122), 1964

**C129** - Labour Inspection (Agriculture) Convention (no. 129), 1969

**C144** - Tripartite Consultation (International Labour Standards) Convention (no. 144), 1976

## Technical conventions

**C001** - Hours of Work (Industry) Convention (no. 1), 1919

**C026** - Minimum Wage Fixing Machinery Convention (no. 26), 1928

**C131** - Minimum Wage Fixing Convention (no. 131), 1970

**C155** - Occupational Safety and Health Convention (no. 155), 1981

**P155** - Protocol of 2002 to the Occupational Safety and Health Convention, 1981