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GROUPE PLASTIVALOIRE

SUPPLIER CODE OF CONDUCT

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1. Purpose

PLASTIVALOIRE Group prioritizes social, environmental, and fair business principles when selecting suppliers, whether they are new partners or existing ones. Ensuring supplier adherence to the following commitments is crucial for PLASTIVALOIRE Group.

PLASTIVALOIRE Group reserves the right to conduct audits, either directly or through a designated third party, at the Supplier's multiple locations at any given time. These audits aim to ensure that the Supplier's practices align with the requirements set forth by the PLASTIVALOIRE Group.

2. Commitments

• Compliance with law & local practices

Suppliers, along with their direct or indirect contractors, are obligated to comply and adhere to the laws, including export control and economic sanctions laws, as well as regulations and local customs prevailing in all the regions where they conduct operations and/or sell products. In cases where international standards outlined below are more stringent than local legal mandates, Suppliers and their direct or indirect contractors are required to abide by the international standards.

Responsible Supply Chain Management

Suppliers are required to proactively avoid violating human rights and to prevent or minimize any environmental impacts caused or contributed to by their business activities. This includes impacts directly linked to their operations, products, or services through their business relationships.

Suppliers conduct assessments regarding human rights and the environment to identify, prevent, mitigate, and be accountable for addressing any potential negative impacts they might have.

They are also responsible for extending this Code to their own supply chain.

3. Labor and social

3.1. Human rights policy

Adherence to international human rights standards is crucial for our collaboration. We kindly request that suppliers rigorously uphold human rights in all their activities and operations.

3.2. No Child Labor

Suppliers are forbidden from employing children in contravention of the International Labour Organization's conventions (ILO Convention Nos. 138 and 182). The minimum employment age will align with the legal minimum age in the respective country or the age for completing compulsory education, whichever is higher. Under no circumstances shall Suppliers hire children under the age of 16. Additionally, Suppliers must adhere to ILO provisions concerning the health, safety, and moral standards for individuals aged 15 to 18. For instance, but not limited to, Suppliers must ensure that workers under 18 do not surpass the designated working hours as per the regulations in the countries where they operate.



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3.3. No Forced Labor

Suppliers are strictly prohibited from engaging in any form of forced or compulsory labor. Forced labor encompasses work or services imposed upon individuals under threat of penalty, against their will. This includes practices like restricting movement, withholding wages or identity documents to coerce continued work, trapping individuals in unmanageable debt or wage deductions, fostering dependency through in-kind payments, depriving them of basic necessities like food or shelter, enforcing compulsory overtime, or causing a loss of social status, among other practices (referencing ILO Conventions Nos. 29 and 105).

Suppliers will take measures to guarantee that workers comprehend their entitlements concerning wage payment, overtime compensation, retention of personal identification, and other related rights.

Recognizing that certain groups, such as migrant workers, historically marginalized groups, youth, unskilled or illiterate laborers, and women, may not be fully aware of their legal rights, Suppliers will ensure equitable treatment and uphold their rights.

In instances where workers are recruited through third-party entities, Suppliers will ensure diligent oversight to ensure these principles are consistently upheld.

3.4. Working Hours

The duration of work, including overtime, alongside break periods and scheduled days off, must adhere to relevant laws, regulations, local norms, collective bargaining agreements, and international conventions. Overtime work should be voluntary and compensated accordingly. No worker should be coerced into work or service outside regular hours under the threat of penalty due to their vulnerable position. For instance, employers should not establish performance targets that compel employees to work beyond regular hours solely to meet minimum wage requirements.

3.5. Fair Wages

Suppliers are obligated to adhere to all relevant laws, regulations, and local customs, encompassing aspects such as minimum wages, overtime regulations, and legally mandated benefits. In areas where no specific legal framework defines minimum wages, the guidelines outlined in ILO Convention No. 131 can serve as a reference point. Workers must receive fair and punctual compensation, and the method of payment should be transparently communicated to them.

3.6. Equality of treatment and Non-Discrimination

Suppliers are prohibited from engaging in discrimination against any worker on the basis of race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, social status, or marital status. This applies to all aspects of hiring and employment practices, including but not limited to job applications, promotions, rewards, training opportunities, job assignments, compensation, benefits, disciplinary actions, termination, and retirement (referencing ILO Convention Nos. 100 and 111).

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3.7. Freedom of association

Suppliers must uphold the rights of workers to freely associate, establish, and join workers' organizations of their choice, seek representation, and engage in collective bargaining, as permitted by and in accordance with relevant laws and regulations. Suppliers must ensure that representatives of such associations are not subjected to discrimination and that they have workplace access and adequate working space to function effectively and without hindrance (referencing ILO Convention Nos. 98 and 87). In cases where legal restrictions exist on freedom of association and collective bargaining, Suppliers should establish alternative mechanisms for workers to communicate their perspectives to management and consider these viewpoints accordingly.

3.8. Health and Safety

Suppliers must minimize health and safety risks for policyholders, employees, contractors, and the public resulting from their operations to the extent practically possible. Operations should align with pertinent regulations, approved codes of practice, industry standards, and should not endanger anyone to the risk of injury or health issues. Hence, Suppliers' selected contractors or suppliers should exhibit a strong dedication to Health and Safety Management and maintain robust policies and procedures accordingly.

Suppliers will furnish their Health and Safety (H&S) indicators, risk evaluations, and plans for enhancing H&S when required. They will embrace a continuous enhancement strategy reliant on compiling and analyzing data on occupational incidents and accidents, as well as feedback. Furthermore, Suppliers will honor workers' rights to partake in these endeavors and decisions related to Health and Safety.

Suppliers will conduct training for their employees and individuals affected by their operations. This training will cover various aspects such as equipment operation, manual handling, risk assessments, fire safety, emergency preparedness, first aid, and appropriate use of personal protective equipment. Additionally, specific training will address health and safety risks pertinent to or caused by the organization's activities.

Suppliers will ensure the provision and maintenance of protection equipment, at no cost to the workers.

3.9. Additional requirements

In addition of above topics PLASTIVALOIRE Group expects that its suppliers will have appropriate policies, procedures and systems in place, to support the following standards:

- Any form of slavery, servitude, or compulsory labor is prohibited
- Ensuring an equal and respectful work environment promotes the defense of women's rights.
- Promoting equity and respecting cultural diversity includes safeguarding the rights of minorities and indigenous peoples
- Workers, without fear of reprisal, intimidation, whistleblowing or harassment should be able to communicate openly with management regarding working conditions.
- Absence of corruption, extortion and bribery practices.
- Information relating to the private life of employees must be kept confidential.
- Compliance with laws and regulations governing the protection, and confidentiality of personal data of employees.



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- Implementation of an organization to fight against counterfeit parts and to defend intellectual property rights.
- Respect of associations including collective bargaining agreements.
- Not use security force for any reason, whether public or private, against its employees

4. Environment

4.1. Environment policy

Suppliers are expected not just to adhere to environmental laws but also actively take steps to safeguard the environment. This involves minimizing the negative environmental effects of their offerings across the entire lifecycle—from creation and manufacturing to transportation, usage, and disposal or recycling. To ensure this commitment, suppliers should possess ISO 14001 certification or an equivalent standard.

4.2. Innovation & product life cycle

Suppliers commit to voluntarily embrace a research-oriented policy aimed at continually enhancing their products to meet increasingly stringent environmental standards. Their commitment extends beyond just considering environmental impacts during product design, encompassing their production, procurement, and post-service processes as well.

4.3. Natural resources preservation

Suppliers concentrate on decreasing raw material and resource consumption while eliminating waste across all their operations. This objective drives enhancements in production, maintenance, and cleaning methods, conservation and transportation modes, and the adoption of strategies like material substitution, reusability, recycling, design modifications, process innovations, and more.

In this context suppliers will promote biodiversity and undertakes to map its supply chain from the origin of raw materials and to prohibit any value chain involving deforestation or land conversion. For high-risk regions and value chains, the supplier commits to providing detailed mapping, a public commitment to no deforestation and no land conversion practices, a time-bound plan with clear actions, supply chain management systems, regular public reporting on progress and independent verification of systems. This is part of the Plastivaloire Group's global strategy to reduce the GHG footprint and its objective of carbon neutrality by 2038.

4.4. Prohibited substances and materials

Suppliers are required to ensure that the products or parts they provide to PLASTIVALOIRE Group, whether standard or specifically developed, comply with all relevant legislation and regulations in their respective countries, the European Union, and globally where these supplies, products, or parts are utilized. Prior validation by PLASTIVALOIRE Group is necessary to confirm adherence to these standards.

Suppliers need to adhere to European REACH protocols or their national/international counterparts, like the American Toxic Substance Control Act (TSCA).

Suppliers might receive requests to disclose information regarding the utilization and origin of specific substances and materials to comply with legislation and regulations. They are obligated to align with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including annex II, and adhere to US conflict minerals legislation. This involves disclosing whether the products they produce or commission contain



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"conflict minerals," referring to minerals that fund or benefit armed groups in particular countries, directly or indirectly.

4.5. CO2 emissions reduction / decarbonization

Suppliers actively encourage the advancement of technologies aimed at reducing CO2 emissions, promoting energy conservation, and fostering recycling solutions. Additionally, they adopt logistical strategies designed to minimize their environmental footprint.

4.6. Animal Welfare

The Supplier commits to respecting and ensuring its suppliers respect the five animal rights formalized by the World Organization for Animal Health (OIE) concerning animal welfare.

4.7. Additional requirements

In addition of above topic PLASTIVALOIRE Group expects its suppliers to limit their environmental impact by controlling disturbances and pollution related to their activities, by making reasonable use of natural resources and by developing responsible waste management.

This approach should cover at least the following areas:

- Reduction of emissions of polluting gas including GreenHouse Gas (GHG) and reporting these emissions annually to Plastivaloire Group
- Optimization of energy efficiency
- Development and use of renewable energy
- Control of water quality and reduction of consumption
- Reduction of air pollution impact
- Sustainable resources management
- Responsible chemical management
- Sustainability requirements for its own suppliers

5. Business practices

5.1. No Corruption & Bribery

Suppliers are obliged to prevent and combat any instances of corruption, bribery, extortion, or unethical advantages, adhering strictly to all relevant laws governing these matters.

Suppliers should not, directly or indirectly, offer, promise, give, demand or accept any bribe or other undue advantage, to PLASTIVALOIRE Group employees, public officials or other private or public actors, with the intention to obtain or retain business or any other improper advantage.

To prevent and uncover bribery, suppliers must establish and implement effective internal controls, ethical guidelines, and compliance programs. These measures may involve raising employee awareness regarding company anti-bribery policies and instituting financial and accounting procedures that guarantee the maintenance of fair, transparent, and accurate books, records, and accounts.



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5.2. Fair competition

Suppliers are expected to uphold fair business practices, ensuring strict compliance with all pertinent laws and regulations concerning fair competition.

This target involves implementation of any precautionary measures to avoid any anti-competitive practices such as cartels fixing prices, agreements on quotas, production or sales and, more generally, any unfair practices which impede free competition, in particular those intending to oust a competitor from the market.

5.3. Loyalty

Suppliers are required to communicate transparently about their financial status, business activities, evolution, and future projections to their business stakeholders. This commitment ensures openness and clarity in their engagements with stakeholders.

5.4. Management of conflicts of interest

A conflict of interest arises when a PLASTIVALOIRE Group employee or a close relative stands to gain personally from a transaction involving the company. To manage conflicts of interest, it's essential to prevent, identify, and disclose situations where there's a genuine risk of conflict involving PLASTIVLOIRE Group employees or their relatives.