



SUPPLIER CODE OF CONDUCT

This supplier code of conduct formalizes Aubert & Duval and its subsidiaries ("A&D") willingness to strengthen its commitments and expectations when addressing sustainable development and ethics issues related to Purchasing. This document is in line with its Ethics Charter and its values.

Through this code of conduct, A&D details its expectations toward suppliers and commits itself to implementing best practices in sustainable purchasing. This code of conduct is also consistent with its external commitments, particularly in the context of relations with its suppliers, especially small and medium sized businesses.

A&D's Purchasing function contributes to the creation of value and its sustainable economic performance. Considering the Purchasing Function's role, we urge our suppliers (all herein referred to as "suppliers") to work with A&D to identify improvement opportunities in their CSR practices.

In this context, the chapters below are intended to outline A&D's requirements and expectation toward supplier in terms of sustainable development and ethics, divided in 3 chapters:

Working conditions, environment, and business ethics.

- > Compliance with these requirements is a deciding factor A&D in the choice and establishment of its business relationships.

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1. Human rights and working conditions

1.1. Human Rights

A&D has adopted an Ethics Charter and requires its Suppliers to respect Human rights as recognized by the Universal Declaration of Human Rights, the ILO's Fundamental Conventions, and any other applicable local, national, and international regulations, as well as the principles details in its policy.

A&D shall rule out any contractual relations with Suppliers that are known not to comply with regulations in terms of forced labor, child labor, minimum working age, discrimination, violence or which are complicit in terms of violations in these areas.

1.2. Health and safety

A&D has adopted a Health Policy and a Safety Policy. A&D expects its Suppliers to comply with standards equivalent to its own and, in particular, to provide their employees with a work environment that meets applicable health and safety standards and manages the impact their activities have on the health of local populations.

1.3. Labor Law

A&D requests its suppliers to comply, wherever they operate, with all applicable local legal provisions as regards to labor law, particularly those concerning legal working hours and minimum wages.

2. Environment

In accordance with its CSR roadmap and Environmental Policy, A&D expect its Suppliers to control their activities' impact on the environment and comply with all applicable regulations. A&D requests its Suppliers to draw inspiration from the best international practices in this area, particularly by setting up an environmental management system.

2.1. Energy and environmental impacts

A&D requests that its suppliers implement actions to improve their energy efficiency and reduce their greenhouse gas emissions and other environmental impacts.

2.2. Natural resources and biodiversity

A&D requests that its Suppliers optimize their use of natural resources and water and limit their impact on biodiversity and water resources.

2.3. Emissions and waste management

A&D requests that its Suppliers manage emissions and discharges associated with their activities, including those linked to the generation and management of waste. A&D encourages programs aimed at minimizing waste generation, particularly hazardous waste, and at implementing all forms of reuse and recycling.

2.4. Product regulations

A&D requests that its Suppliers comply with the market access and product regulations in force (such as the REACH regulations in Europe) and attach the greatest importance to the knowledge and management of the toxic impact of the products they use.



3. Business Ethics

Under its Ethics Charter, A&D has adopted principles aimed at protecting the integrity of its activities. These principles are as follows:

3.1. Corruption et conflicts of interest

A&D condemns all forms of corruption and prohibits any situations entailing a conflict of interest involving its employees and Suppliers. Continuation of the Group's relationships with its Suppliers shall be conditional on the latter refusing any corrupt act or money-laundering, any situation of conflict of interest and any other breach of the legal provisions applicable in the countries in which they operate. With regard to gifts and invitations, the transparency rule applies in all circumstances: gifts received or offered as part of a business relationship are reported to management and authorized in accordance with the conditions set out in the Group Policies in force at A&D.

3.2. Fraud and Deception

Fraud is commonly defined as deliberate deception, misappropriation of resources or manipulation of data to the advantage or disadvantage of a person or entity, including any act of corruption.

A&D has a "Zero Tolerance" policy towards fraudulent behavior and asks its suppliers to have the same high standards for its employees and partners.

3.3. Compliance with competition rules

A&D has pledged to comply with competition regulations and expects the same of its Suppliers. A&D has established procedures specifically aimed at ensuring the respect of the equality of treatment of Suppliers, and that all purchasing decisions are based on an objective and comparative assessment of the Suppliers' integrity and reliability. All its procurement decisions are based on the criteria of price, quality, performance, lead times and the suitability of the proposed services for the A&D needs. Furthermore, the A&D strictly complies with regulations which prohibit any agreement, concerted practice or abuse.

3.4. Respect for confidentiality and industrial property

A&D considers the respect of confidentiality and patent rights one of its main priorities. The information that the Suppliers share with A&D will be treated with due respect and used only for authorized purposes. A&D expects its Suppliers to make the same commitments.

3.5. Product traceability and Conflict Minerals

A&D requests that its Suppliers ensure that materials and products delivered to A&D are of legal origin and can be traced properly, particularly for raw materials.

For all suppliers of conflict minerals (3TG Tin, Tungsten, Tantalum & Gold), A&D systematically request to source only from value chains using smelters or refineries assessed as compliant according to OECD recommendations.ⁱ

3.6. Transparency and reporting

A&D has obligations and has made commitments on transparency and the publication of non-financial information.

A&D expects its Suppliers to implement the same practice in their contractual relations and their own stakeholders.



4. Commitment of suppliers and subcontractors

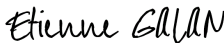
When managing relations with its Suppliers, A&D Purchasing function may verify, namely through evaluations and/or audits, that the above principles and rules are being observed. If necessary, A&D will take appropriate measures following these verifications. A&D is convinced that this code of conduct's provisions is a sound way to improve its overall performance and that of its suppliers and is aware of the efforts that some of them will have to make in order to comply with these provisions. In this context, A&D is willing to support any Supplier that undertakes an improvement process, to the extent of its possibilities.

By accepting the principles of this code of conduct, A&D suppliers and subcontractors undertake to support A&D by complying to CSR commitments and agree to be assessed by A&D on the principles set forth above

Finally, A&D also expects its Supplier to do their utmost to pass on equivalent provisions throughout their own value chain.

Company Name	Name and position of signing authority	Date	Signature

Etienne GALAN, President Aubert & Duval

Signé par :

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ⁱ <http://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>