

# RESPONSIBLE PURCHASING — CHARTER 2023



ALTEN

As a world leader in IT services and engineering, ALTEN has a special responsibility toward all its stakeholders. In 2010, we signed the Global Compact, formalising our commitment to human rights and the environment and placing ethics and sustainable development at the heart of our strategy. It also commits all our employees to the Group's values: fostering human ethics, building an engineering culture and pursuing profitable, sustainable growth. We overhauled our responsible purchasing policy in 2022 and, through this charter, we are bringing all our suppliers on board to help achieve our shared sustainable development objectives.

*Simon Azoulay*

Chief Executive Officer

*Frédéric Mouton*

Director of Purchasing  
and General Resources

## Introduction

To provide a framework for our employees and subcontractors' activities as well as our own business, ALTEN has set out our commitments in a variety of charters:

- The Ethics and Compliance Charter,
- The Sustainable Development Charter,
- The Responsible Purchasing Charter,
- The Group Purchasing Policy,
- The Anti-corruption Code of Conduct.

These commitments apply to the operations of all our employees. They are reflected in the Group's CSR, ethics and compliance strategies. The strategic focuses of ALTEN's Sustainable Development approach have been aligned with these values and built around the following four pillars:

- A career-boosting employer,
- A stimulator of innovation,
- A responsible and civic-minded partner,
- A company committed to the environment.



**ALTEN Group's responsible purchasing approach is based on five strategic aspects that apply to the Purchasing Department and its stakeholders:**

1. Reinforcing and highlighting the responsible purchasing approach,
2. Protecting the environment: acting on the three scopes and promoting responsible digital technologies,
3. Fostering inclusion through socially responsible purchasing,
4. Mapping, assessing and managing the risks of purchasing,
5. Managing and communicating on responsible purchasing performance.

In January 2023, ALTEN obtained level 3 of the Responsible Purchasing label, based on AFNOR's ISO 20400 standard.

**The Group is also committed to promoting this strategy throughout its sphere of influence. With this charter, ALTEN invites all its suppliers and partners to join with it to proactively advance and continuously improve its CSR initiatives.**

# ALTEN's commitments

## to its suppliers

ALTEN undertakes to respect the ten principles of the Global Compact, the Universal Declaration of Human Rights of the United Nations, the fundamental conventions of the International Labour Organization, and the OECD Guidelines for Multinational Enterprises.

### BUSINESS RELATIONSHIPS

ALTEN Group aims to work with the best suppliers on the market to offer high service quality, controlled costs, and innovative solutions.

In referencing or commercial relations with suppliers and subcontractors, ALTEN Group is committed to a key principle based on partnership, ethics, loyalty, and integrity.

**ALTEN Group is also adjusting its practices to broaden the scope of its calls for tender to small and medium businesses throughout the country.**

### CONTINUOUS IMPROVEMENT IN CSR

In its continuous improvement approach, ALTEN offers support to its strategic suppliers to improve their CSR performance and works with them to identify areas for progress and best practices. During a call for tenders, all bidders respond to a dedicated questionnaire that assesses their CSR maturity.

**Supplier performance management is defined and structured around three key areas:**

- Annual performance reviews involving stakeholders,
- Annual supplier evaluation campaigns,
- An audit process designed to assess supplier compliance with standards, regulations and contractual requirements relating to the services provided to the Group.

### RESPONSIBLE BUYER BEHAVIOUR

ALTEN Group's purchasing policy and practices ensure the fundamentals of fair treatment, independence, fighting against embezzlement, transparency in its choices and decisions, and reciprocal continuous improvement for our mutual benefit. Tenderers and suppliers are treated with respect and transparency.

The Purchasing Department refuses all illegal business practices and implements methods and tools to ensure that exchanges and relations with suppliers comply with regulations.

**ALTEN is committed to acting in compliance with current regulations and to promoting these values and principles among all its employees.**

### COMBATING CORRUPTION AND RAISING ANTI-CORRUPTION AWARENESS AMONG EMPLOYEES

ALTEN Group has a "zero tolerance" policy toward corruption and influence peddling. It is committed to spreading this message to all its stakeholders. It also complies with the national and international standards to which it is subject in terms of detecting and preventing corruption.

**ALTEN has defined and implemented its corruption prevention policy in accordance with the requirements of France's Sapin II law and international laws such as the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and principle 10 of the United Nations Global Compact.**

As soon as new employees are hired, they are made aware of ALTEN Group's "zero tolerance" culture toward corruption, particularly through the Welcome Booklet, which refers to the Group's Ethics and Compliance Charter. The Group's anti-corruption code of conduct and gifts and invitations policy are included in the welcome pack given to new recruits.

An e-learning programme entitled "Preventing Corruption", available in several languages, has been rolled out and incorporated into the compulsory training programme for all employees, including new recruits. This e-learning course outlines the main points of the Group's anti-corruption policy and includes a quiz to test learners' understanding. Ethics and compliance ambassadors also receive ongoing training.



For many years, the Group's Ethics & Compliance Charter has formalised ALTEN Group's commitment to zero tolerance of corruption and conflicts of interest. It is supplemented by an anti-corruption code of conduct. These documents are available on the Group's website and can be viewed by all its stakeholders at the following address:

<https://www.alten.com/fr/alten-une-entreprise-engagee/>

## THE REPORTING SYSTEM

In accordance with France's law on transparency, the fight against corruption and the modernisation of economic life, known as "Sapin 2", and as part of its anti-fraud system, ALTEN provides an "ALTEN INTEGRITY LINE" reporting system.

This system allows any ALTEN Group stakeholder (internal or external) who witnesses or is the victim of an event that breaches or goes against applicable laws or ALTEN's ethics and compliance policy to report it confidentially (and, where applicable, anonymously).

This system can be accessed via the secure platform: <https://alten.integrityline.com>

## PERSONAL DATA PROTECTION

**ALTEN complies with personal data protection regulations.**

ALTEN respects privacy and protects personal data. ALTEN strictly complies with applicable local laws and regulations in this field.

## CONFIDENTIALITY & INTELLECTUAL PROPERTY

**ALTEN Group strictly respects the intellectual property rights (patents, trade secrets, brands, etc.) and know-how of its partners and, more generally, third parties.**

It ensures that the Group's intangible assets (patents, expertise, brands, etc.) are protected. ALTEN complies with all internal and external data and information protection and security rules.

## INTEGRITY & ETHICS



ALTEN Group conducts its business in accordance with the principles of honesty and fairness and the applicable regulations on competition and the prohibition of corruption in business transactions. ALTEN is committed to complying with its “Anti-Corruption Code of Conduct”.

ALTEN Group’s buyers must comply with the rules of competition law and commercial law; they have all been trained in the equal treatment of all suppliers and the prevention of corruption.

They have also signed two ALTEN documents: the “Gift and Invitations Policy” and the “Purchasing Employee Ethics Charter”.

## DIVERSITY, INCLUSION & REGIONAL DEVELOPMENT

ALTEN is a signatory of the Responsible Supplier and Purchasing Charter (RSPC) and aims to move towards collaborative relationships by supporting the green and social economy. In this way, ALTEN helps to boost small and medium businesses and strengthen the economic fabric.

With its policy on diversity, ALTEN fosters the employment of those with disabilities or who are otherwise excluded from the labour market and works with suppliers who do the same.

Management orients its purchasing accordingly to the greatest extent possible.



# Obligations

## to ALTEN

By signing this Charter, the ALTEN Group's suppliers undertake to comply with the principles of the United Nations Global Compact and the International Labour Organization and all national and international regulations in force. They undertake to devote the necessary means to ensure that they respect the principles set out in this Charter.

### HUMAN RIGHTS

Suppliers agree to respect and promote international guidelines on human rights (right to education, freedom of expression, a healthy environment, etc.) within their sphere of influence. In particular, they ensure that they are not complicit in any breach of these fundamental rights.

They treat their own employees and those working for their suppliers with dignity and encourage fair working practices. This includes offering fair and competitive wages and prohibiting harassment, intimidation and discrimination. Suppliers must identify the real risks and negative impacts on human rights associated with their activities and business relationships.

They must take appropriate measures to reduce risks and ensure that their operations do not cause or contribute to human rights breaches and to remedy any negative impact directly caused, or to which they have contributed, by their activities or business relationships.

**Particular attention must be paid to the rights of vulnerable groups, including women, children, people with disabilities, indigenous peoples, migrant workers, the elderly, etc.**

It is important that indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership, occupation or use, as well as those that they have acquired.

### CHILD LABOUR

**Suppliers contribute to the effective abolition of child labour.**

The term "child" refers to any person under the legal minimum age for admission to employment in the country where the work is carried out, and/or the minimum age for admission to employment as defined by the International Labour Organisation (ILO), whichever is higher. All employees under the age of 18 must be protected from performing work that is likely to be hazardous or harmful to their health or their physical, mental, social, spiritual or moral development.

Where applicable, they must also take account of the conditions governing apprenticeships and other equivalent professionalisation schemes provided for by local law.

### ILLEGAL EMPLOYMENT

The Supplier refuses any illegal employment (unreported work, employment of foreigners not authorised to work, etc.) and complies with the regulations on subcontracting and the social and tax legislation in force.





## FORCED AND COMPULSORY LABOUR

Suppliers must work toward eliminating forced or compulsory labour as defined by the ILO. All work must be voluntary, and workers must be free to leave or terminate their employment with reasonable cause.

Suppliers shall not retain, destroy or deny access to any form of employee identification (passports or work permits) as a condition of employment, except as required by applicable law.

Suppliers must not charge or demand fees, recruitment costs or deposits from employees, either directly or indirectly, as a condition of employment.

Suppliers must respect employees' right to terminate their employment contracts with reasonable notice and to receive all wages due to them.

## HARASSMENT

Suppliers agree to treat all their employees with dignity and respect, to prevent and combat all forms of harassment and violence in the workplace, and to comply with all applicable regulations. They shall refrain from making verbal or physical threats and engaging in physical violence, sexual abuse or any form of harassment in accordance with ILO conventions.

## DISCRIMINATION



Suppliers are prohibited from making any distinction between people on the basis of their age, sex, religious beliefs, political opinions, sexual orientation, social or ethnic origin, disability, marital status, nationality, surname or physical appearance and undertake to promote cultural diversity.

They must promote equal treatment and equal opportunities in accordance with the ILO's principle of non-discrimination in areas such as recruitment, pay, working hours and paid rest/leave, maternity protection, job security, job assignment, performance and promotion evaluations, training and opportunities, job prospects, social security and occupational health and safety.

Suppliers also agree to comply with applicable legislation on the employment of those with disabilities.

## FIGHTING CORRUPTION

Suppliers agree to tackle corruption in all its forms, including extortion and bribery. They will not offer, directly or indirectly, any kind of advantage, pecuniary or otherwise, to ALTEN Group buyers. Gifts and invitations must comply with ALTEN Group's Gifts and Invitations Policy, of which Group employees are made aware, and must never create obligations between the recipient and the giver.

## HEALTH AND SAFETY



Suppliers will ensure that their employees have an appropriate quality of life and health and a suitable work environment, in compliance with current local and international health and safety regulations. They agree to declare their staff to the social security bodies.

Suppliers are required to provide their employees with a safe and healthy working environment and to avoid accidents, personal injury or exposure to danger that may be caused by, related to or resulting from their work, including while using equipment or chemical products or travelling for work. Suppliers must implement procedures and training to detect, avoid and mitigate as far as possible any hazard that constitutes a risk to staff health, hygiene and safety. Suppliers are required, as a minimum, to comply with all applicable local and international laws and regulations in this respect. Health and safety instructions must be put in place and widely communicated. Workers' compliance with these instructions must be regularly assessed. Workers must be provided with protective equipment appropriate to their activities. The same principles apply to accommodation provided by suppliers.

## REMUNERATION

Suppliers must abide by the national legislation with respect to minimum wage and the principle of equal pay. They agree to pay their employees their wages on a regular basis and to remunerate them for overtime in accordance with the rates defined by the applicable legislation. Suppliers must not allow deductions from wages as a disciplinary measure nor any other deduction not provided for by national legislation.

## FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

ALTEN Group suppliers agree to comply with legislation and ILO conventions on workers' right to freedom of association. They recognise the right to collective bargaining and the right to communicate openly with management about working conditions, without fear of harassment, intimidation, sanctions, pressure or retaliation.





## THE ENVIRONMENT



**Suppliers must comply with all current environmental laws and regulations. They undertake to exercise caution when dealing with environmental issues. They strive to reduce their direct and indirect environmental footprint, in particular by developing initiatives to promote greater environmental responsibility, including:**

- Climate protection (reducing energy consumption and greenhouse gas emissions by promoting the use of renewable energies)
- Protecting nature, preserving biodiversity and ecosystems; conserving natural resources (water, materials, etc.), using sustainable, healthy, renewable, recyclable, recycled or reused materials; limiting nuisance to local residents; limiting waste generated during the various stages of manufacture, transport, on-site installation and disposal, as well as waste treatment and the appropriate management of hazardous chemical products, favouring material and energy recovery.

They undertake to implement measures to prevent soil, water (quality, consumption and management) and air pollution and to limit waste production.

Suppliers must implement an appropriate environmental management system, including policies and procedures to effectively manage their environmental performance. This management system may be certified ISO 14 001 or equivalent.

**Suppliers must be aware of the role they play:**

- They measure their carbon footprint,
- They are aware of the six current climate objectives (mitigation of climate change, adaptation to climate change, sustainable use and protection of water and maritime resources, transition to a circular economy, prevention and control of pollution, protection and restoration of biodiversity and ecosystems),
- They implement action plans,
- They measure their performance.

## PROTECTION OF INFORMATION

**Suppliers agree to comply with ALTEN Group's "Security Requirements for Third Parties" document.**

ALTEN Group requires its suppliers to take all necessary steps to guarantee the confidentiality of professional secrets and other non-public information communicated in the context of their business relationship with ALTEN Group.

## DIVERSITY AND INCLUSION

The Group also asks its suppliers to commit, as far as they are able, to social inclusion (integration, employment for those with disabilities, etc.) and local development. Supporting documents on how these commitments are fulfilled may be requested.



## Implementation

### and continuous improvement



This Charter is an integral part of the General Terms and Conditions of Purchasing and applies to all ALTEN Group suppliers. The Group aims to promote social and environmental clauses. It asks its suppliers to highlight their Corporate Social Responsibility actions as competitive advantages.

Suppliers undertake to implement all necessary means to ensure that they respect the principles set out in this Charter and to pass on these guidelines to their own suppliers, including those operating in countries that are not signatories to the International Labour Organization conventions. They agree to conduct an annual review of the progress they have made in complying with the principles of this charter at ALTEN's request. ALTEN Group reserves the right to conduct audits.



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The management of supplier relations is based on continuous performance monitoring, annual evaluation and satisfaction campaigns, and a process of targeted audits. In this regard, the supplier agrees to respond within the allotted timeframes to any request to measure its compliance with ALLEN Group's requirements.

In a spirit of partnership, the Group is committed to onboarding and supporting its suppliers in a continuous improvement process by defining, implementing and monitoring progress plans.

If any practice not in keeping with the principles stated in this Charter is identified, ALLEN Group reserves the right to ask the service provider to implement corrective actions or to terminate any commercial relationship, depending on the severity of the breach.

## We hereby confirm that:

- We have received and fully reviewed ALLEN Group's Responsible Purchasing Charter,
- We are committed to implementing these principles, and non-compliance may be considered a breach of our obligations and could lead to the termination of the commercial relationship, depending on the seriousness of this non-compliance,
- We will accordingly inform all our direct suppliers and encourage them to respect these principles.

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

Company name: .....

Representative's name: .....

Representative's title: .....

Signature:

For further information, please contact:  
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