GSC Sustainable Purchasing Chart

December 2018



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#### Preamble

This Charter presents the commitments expected by GSE in terms of ethics, the fight against corruption, respect for human rights and Labour Standards, the protection of human health and safety, and the protection of the environment. By adhering to this charter, the Supplier acceptance or Subcontractor undertakes to make its best efforts to respect and implement, and to enforce its own Suppliers to respect and implement, all the principles exposed, in accordance with the contractual provisions and the applicable national laws.

The Supplier (a generic term consisting of the names of Supplier and Subcontractor) must respect the principles of the United Nations Universal Declaration of Human Rights, the Fundamental Conventions established by the International Labour Organization (ILO), the different laws and regulations applicable.

It endorses the 10 principles of the United Nations Global Compact, to which GSE is fully committed, and of which it has been a member since 2003.

Suppliers play a key role in the success of GSE, which wishes to share with them its commitment to Sustainable Development and involve them in a process of continuous improvement.

As part of its Sustainable Development policy, GSE deploys a CSR (Corporate Social Responsibility) strategy.

GSE wishes to share its values and involve its Suppliers in the deployment of this Sustainable Development strategy.

In accordance with its CSR strategy, GSE deploys a Purchasing Policy which allows to maintain a balanced relationship with its Suppliers .

This Sustainable Purchasing Charter is communicated to all GSE Providers.

It is available in French and in English, and can be consulted at any time on the Group's website:

http://www.gsegroup.com/ ("Who are we?" section)

In accordance with French law, GSE has a procedure for the protection of whistleblowers. It is freely accessible on the GSE website:

http://www.gsegroup.com/ ("Who are we?" section)

The GSE Anti-Corruption Charter is available in the same place.

For all reports, a specific email address has been created; it guarantees anonymity and protection for the issuer of the report:

alerte.gse@gmail.com

# GSE approves the 10 Principles of the United Nations Global Compact. Human Rights



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



make sure that they are not complicit in human rights abuses.

#### Labour



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



the elimination of all forms of forced and compulsory labour;



the effective abolition of child labour; and



the elimination of discrimination in respect of employment and occupation.

#### Environment



Businesses should support a precautionary approach to environmental challenges;



undertake initiatives to promote greater environmental responsibility; and



encourage the development and diffusion of environmentally friendly technologies.

#### **Anti-Corruption**



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



## **Ethics**

GSE and its Suppliers are committed to loyalty in order to build and maintain lasting relationships of trust.

The Supplier conducts its business in accordance with the principles of honesty and fairness and the applicable regulations on competition and the prohibition of bribery in commercial transactions.

GSE treats with honesty and fairness all its Suppliers, whatever size and field of activity, respecting the principle of fair and open competition.

GSE Providers establish and maintain governance based on:

Responsibility Transparency Ethics Respect for stakeholders' interest Compliance with legislation and regulations

Taking into account social, environmental and economic issues must be at the core of their relationship with GSE.

In accordance with its charter of ethics, GSE selects its Suppliers on the basis of objective criteria and requires them to allow it to fully meet its expectations and those of its customers.

GSE expects its Suppliers to appropriate the principles of this Code of Ethics for themselves and to decline them to their own Suppliers .

## **Respect for Labour Standards**

Suppliers promote and comply with the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as International Human Rights law. They are not complicit in human rights abuses.

Thus, the Supplier must put in place mechanisms guaranteeing the respect of the following principles:

- Abolition of child Labour
- Elimination of forced and compulsory labour
- Freedom of association and right to collective bargaining
- Elimination of discrimination and fair treatment in the workplace: the Supplier undertakes not to make any distinction, exclusion or preference based on race, color, sex, religion, political opinion, national extraction or social origin, which has the effect of destroying or impairing equality of opportunity or treatment in employment or occupation (ILO Convention C111)
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- Freedom of association, protection of the union right and collective bargaining (ILO Convention C87)
- Protection of health and safety at work: the Supplier ensures that its activities do not harm the health and safety of its employees, its own Suppliers and local populations. The Supplier provides its employees with appropriate protective equipment.

## **Environmental Protection**

The Supplier complies with all applicable environmental laws and regulations. It keeps and updates all the approvals required for the environment.

The Supplier makes every effort to approach the best practices in terms of environmental protection.

It focuses in particular on the protection of nature, the maintenance of biodiversity and ecosystems, combating the depletion of natural resources, and sound management of waste and toxic substances.

The Supplier shall minimize its impact on the environment and reduce its energy consumption, CO2 emissions and water consumption, as well as its use of non-renewable natural resources or products that are not environmentally friendly.

The Supplier adopts the precautionary principle in approaching environmental problems. It detects, identifies and assesses potential environmental risks and takes all appropriate measures to mitigate or eliminate them where possible.

It strives to limit disturbances to residents, reduce energy consumption, releases into water, air and soil and waste generated in the various stages of manufacturing, transportation, installation on site, marketing products and services, and waste disposal.

The Supplier sets up mechanisms to monitor and minimize the emission of noise, dust, odors, particles and any other source of local pollution.

In each of its activities, the Supplier is committed to reduce waste as well as to optimmize recycling and re-use of materials.

The Supplier works to take into account and reduce the impacts of its products, or those it uses, in their overall life cycle, from design and production up to use and end of life.

## GSEs' commitments to its suppliers

- Treat its Suppliers with loyalty, honesty, fairness and respect.
- Respect the principle of equity in the treatment of its Suppliers. During a call for tenders, provide the same information to the bidders, ask for the same deadlines, and evaluate the bids according to the same criteria.
- Respect the confidentiality of commercial and technical information provided by the Supplier. All information should not be disclosed to third parties.
- Apply transparency and traceability throughout the procurement process, and select suppliers impartially based on predefined, explicit and clear criteria.
- Respect the contractual conditions signed, and in particular the terms of payment.
- Prevent potential conflicts of interest. In order to avoid any risk of conflict of interest, purchasers or specifiers must act in the interest of GSE without their personal, family or friendly interest interfering with their professional decisions.
- Respect the ethical rules of individual behavior. For all purchases, and for tenders, purchasers and specifiers must reject any gift or benefit that may affect the award of the contract.
- Address the reasoning of global costs and impacts, looking at the life cycle of products, ie taking the entire manufacturing process, packaging optimization, delivery, storage, maintenance, scrapping, ...
- Respect the confidential nature of the technical and commercial information communicated by the Suppliers. The same is true of the property and intellectual property rights of the Suppliers.
- Implement a progressive Sustainable purchasing approach. Engaging in a Sustainable approach is a virtuous circle that requires collaboration and support from Suppliers in the environmental and social quality of their offers.
- Seeking to build long-term relationships with Suppliers in a common and continuous improvement approach. GSE is committed to helping our Strategic Suppliers improve if their results prove to be less than required.
- Integrate local suppliers into procurement activities to promote local economic development.
- Avoid between GSE and its Suppliers any economic dependence that could endanger one of the two parties. Develop methodologies and action plans to detect these situations and take appropriate action.
- Communicate regularly and consistently, internally and externally, about the GSE Sustainable Purchasing Program.

## Suppliers' commitments to GSE

- Respect fundamental principles of Human Rights, Labour Law in accordance with the ILO Declaration, and work for the continuous improvement of the working conditions of employees, especially in terms of diversity and social protection.
- Respect the safety rules for people and installations at all sites.
- Promote the employment and professional integration of people with disabilities or those who are remote from employment.
- Respect the applicable laws, particularly social and fiscal, and data protection regulations, including EU Regulation 2016/679 of 27 April 2016 (GDPR).
- Respect the regulations concerning the protection of the environment.
- Limit the environmental impact by reducing emissions in the air, water, soil ...; the reduction of energy and raw materials consumption; recycling of waste and packaging.
- Propose any initiative that favors local economic development.
- Commit to fighting all forms of corruption, including extortion, fraud and bribery. Suppliers are prohibited from offering GSE employees any advantage (free goods or services, jobs or opportunities) that would facilitate their activities with the GSE Group.
- Reveal any situation that may appear to be a conflict of interest, and bring to its attention the cases where an employee of GSE could have any interest in the Supplier's activities, or a personal economic link with it.
- Take preventive measures to avoid any anti-competitive practices or behavior.
- Respect the confidentiality of information received that is the property of GSE and never use this information for their own benefit, and ensure the respect of intellectual property rights.
- Transmit accurate and fair information that is not likely to be misleading in carrying out activities.
- Commit to working in a transparent and accountable way in their business.
- Promote the principles of this Sustainable Purchasing Charter with its own Suppliers, and ensure at each step that they meet the same requirements.
- Respond promptly to reasonable requests from GSE representatives on the implementation of these principles.



# Lack of respect

If certain elements of this charter are not respected, the Supplier may be required to prepare, document and implement a corrective action plan to improve the situation and to become compliant.

GSE reserves the right to withdraw from Suppliers who do not comply with this charter.

