GSE's commitments

RESPONSIBLE PURCHASING CODE

To ensure compliance with sustainable development throughout the supply chain



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1. INTRODUCTION

01

1.1. Our pledge

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1.1. Our pledge

“GSE is committed to playing a leading role in improving our industry's standards for sustainable development.”

For over twenty years, we have been actively committed to raising the standards of our industry in terms of sustainable development. Our track record and achievements bear witness to this profound and ongoing commitment.: *Joining the French Global Compact network when it was created in 2003, creating a Quality and Safety Vademecum in 2007, our first environmental certifications in 2010, signing a gender equality agreement in 2013, creating the GSE Foundation in 2018, launching our eco-responsible buildings R&D programme in 2020...*

In 2023, we took the next step by becoming a ‘Mission Company’. Our purpose, **" Designing and building with respect for nature, developing by serving local communities, prospering by taking care of people "**, now guides all our actions.

We are aware of our social responsibility and the path we wish to take. We also know what we are not prepared to accept: failure to respect human rights, corruption and environmental degradation.

We wanted to set these commitments in stone. So, we wrote our charters, which apply to each and every one of us.

Thank you all for sharing them and making them everyday principles.

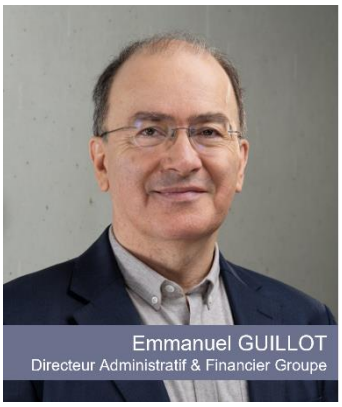
Roland PAUL,
Chairman

The Executive Committee

We are committed to respecting this code of ethics and to putting it into practice in everything we do. This charter applies to everyone and knows no boundaries within the Group ; it applies to all our activities.

Ethics are the responsibility of each and every member of the team, as well as the responsibility of the Group, the trust it inspires and the reputation it has earned.









1.2. GSE and sustainable development

GSE's core business is the design and construction of real estate. GSE aims to differentiate itself through the added value it creates for its Clients, placed at the heart of its projects, its actions and its concerns. Sustainable development is a pillar for building the Group's future, and a necessity for reducing and anticipating environmental and social crises.

In 2019, GSE created its first roadmap with 5-year objectives, specific actions and steering indicators, all selected on the basis of the Global Compact's universal framework.

In 2023, the Group has decided to go even further by becoming a company with a mission, thus placing CSR at the heart of its strategy, its transformation, its businesses and its DNA. As a natural consequence, a new roadmap is taking shape, based on three main axes:

- **Reducing environmental impact** by developing new, innovative solutions for building in harmony with the living world.
- **Local presence** through employment, the materials used and the creation of local ecosystems
- **Development in the interests of employees, customers, suppliers and partners** in order to reconcile economic sustainability, quality of life at work and professional development.

As a result, the company's sustainable development strategy is now guided by a purpose : "*to design and build with respect for nature, to develop by serving the territories and to prosper by taking care of people*."

In addition, GSE has formalised its commitments in **7 key documents**: the Ethics Charter, to which are added three specific policies (anti-corruption, management of conflicts of interest and protection of whistleblowers), the Responsible Purchasing Charter, the Human Rights and Diversity Code and the Environmental Code .

In this framework, the aim of the responsible purchasing charter is to present and encourage GSE suppliers to comply with the principles of ethics, respect for human rights and protection of the environment.



Through this charter, GSE and its partners undertake to respect the 10 principles of the United Nations Global Compact

HUMAN RIGHTS

Principle 1: Companies are invited to promote and respect the protection of international human rights law

Principle 2: Companies are invited to promote and respect the protection of international human rights law.

LABOUR

Principle 3: Companies are invited to respect freedom of association and recognise the right to collective bargaining;

Principe 4: Companies are invited to contribute to the elimination of all forms of forced or compulsory labour

Principle 5 : Companies are invited to contribute to the effective abolition of child labour.

Principle 6: Companies are invited to contribute to the elimination of all discrimination in respect of employment and occupation.

ENVIRONNEMENT

Principle 7: Companies are invited to apply the precautionary approach to environmental problems;

Principle 8: Companies are invited to take initiatives to promote greater environmental responsibility

Principle 9: Companies are invited to encourage the development and dissemination of environmentally friendly technologies.

ANTI-CORRUPTION

Principle 10: Companies are invited to take action against corruption in all its forms, including extortion and bribery.



2. CONTEXT

2.1. Definitions

2.2. Responsibilities

02

2.1. Definitions

CODE

Formal statement of GSE's commitments, their implementation and communication. It can translate into one or more specific company policies that affirm its guidelines, fundamental ideas, collective values, and rules regarding specific issues.

GSE

GSE and all companies belonging to the group.

STAKEHOLDERS

All persons or organisations that can impact or be impacted by GSE's activities, directly or indirectly.

TEAM MEMBER

Any person, whether an employee or an external partner, who works directly for GSE.

SUPPLIER

A generic term designating a GSE supplier or subcontractor of level 1 or 2.

ENVIRONNEMENT

All the natural and cultural conditions that can affect living organisms and human activities. As defined by the French Environmental Code, the term "environment" will be used here to cover nature, i.e. animal and plant species, biological equilibria, natural resources (water, air, soil, mineral deposits), as well as sites and landscapes.

CORRUPTION

Corruption is the fact of unlawfully offering, at any time, directly or indirectly, to a person holding public office or not, benefits with the aim of obtaining the performance, facilitation or non-performance of an act pertaining to his/her activity or function in violation of his/her legal, contractual or professional duties. It also refers to the fact of unlawfully granting, agreeing to or requesting, at any time, directly or indirectly, any benefit, for oneself or for another person, for performing or having performed, for refraining or having refrained from performing an act of one's activity or function at GSE, in violation of one's legal, contractual or professional duties.

HUMAN RIGHTS

Refers to the faculties, freedoms and claims inherent in every person on the sole basis of their human condition. These are the inalienable rights of all human beings without distinction of any kind, including of race, gender, nationality, ethnic origin, language, religion or other status. They include the right to life and liberty. They establish that no one shall be held in slavery, that no one shall be subjected to torture. Everyone has the right to freedom of opinion and expression, to work, education, etc. We all have the right to exercise our human rights equally and without discrimination. They are irrevocable, non-transferable, and irrefutable. Even when they are protected by most international regulations, human rights represent a moral and ethical basis that society considers necessary to respect for the protection of people's dignity.

They are enriched in the International Bill of Human Rights.

CONFLICT OF INTEREST

A conflict of interest arises when two or more potentially conflicting motives may lead a GSE stakeholder to make a decision and/or act in a way that is or may be detrimental to GSE's interests. It can also be defined as a detrimental conflict between the interests of GSE and those of persons who provide governance, have operational functions within the organisation, or act in an advisory capacity.

2.2. Responsibilities

RESPONSIBLE SUPPLIERS

All GSE suppliers must apply the rules and provisions laid down in the company's Responsible Purchasing Code.

Suppliers undertake to make effort to comply with, and ensure that their own suppliers comply with, all the principles set out in the code – in accordance with contractual provisions and applicable national legislation.

The Responsible Purchasing Code does not supersede applicable and regulations.

It defines attitudes to adopt and benchmarks for exemplary personal and professional behaviour. In implementing these rules, every GSE representative and supplier should demonstrate common sense and probity.

Through a good knowledge of these rules, suppliers will be able to determine when red lines are close to being crossed and when it becomes necessary to seek advice from a GSE contact or from the GSE Ethics Officer.

ETHICS OFFICER

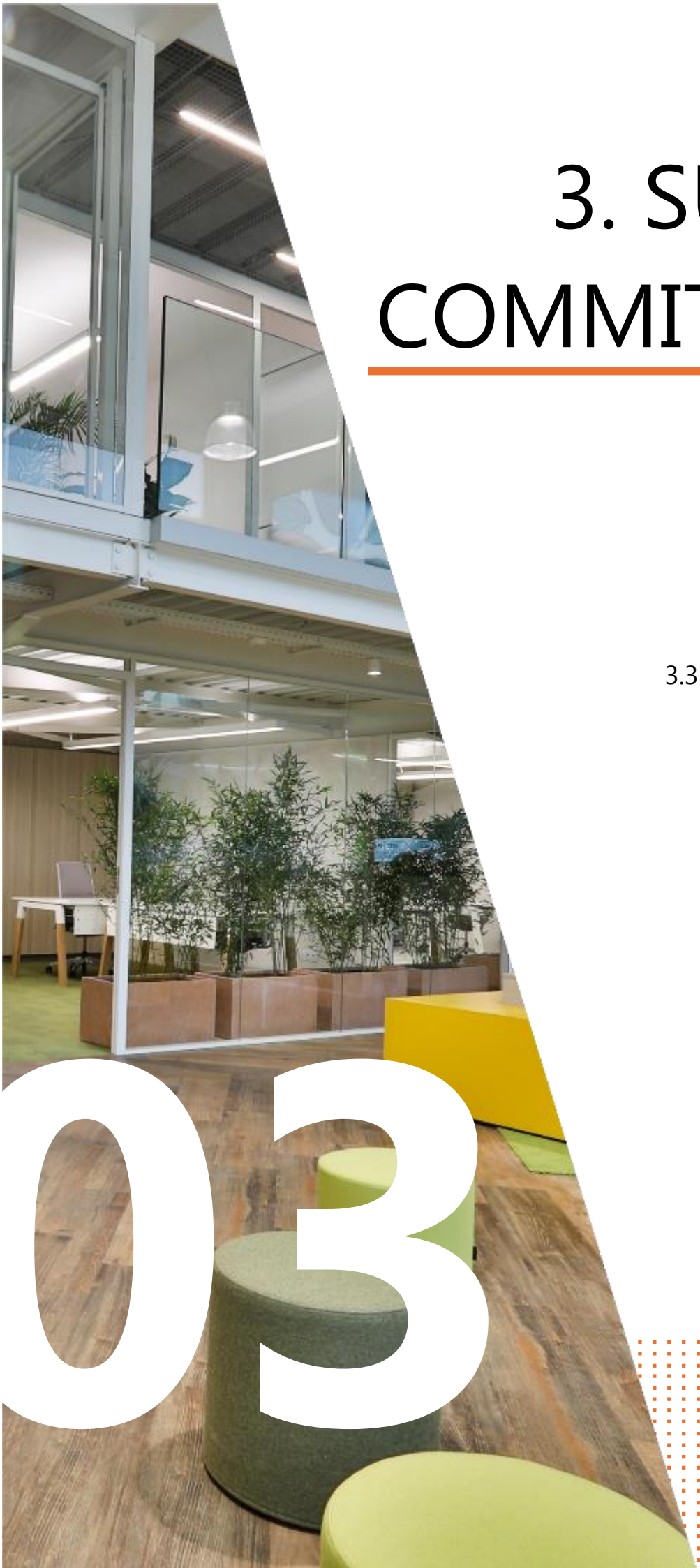
GSE's management defines the Group's policy on purchasing responsibly and ensures that this code complies with our legal and moral obligations.

GSE has appointed Mario Milanesi to the position of Ethics Officer. All requests for clarification or interpretation of this code should be addressed to him.

His mission is to ensure, in liaison with the operational or functional departments, that the code is properly understood. He may be consulted directly, entirely confidentially, by any team member or supplier who experiences issues or has questions about the definition or application of these rules.

CONTACT

Mario Milanesi,
Ethics Officer
mMilanesi@gsegroup.com



3. SUPPLIER COMMITMENTS

3.1. Ethics

3.2. Human rights

3.3. Environmental protection

3.4. Due diligence

3.5. Customer relationship

03

3.1. Ethics

3.1.1. Suppliers establish and maintain governance processes based on accountability, transparency, ethics, respect for stakeholders' interests, and compliance with rules and regulations.

3.1.2. Suppliers comply with applicable laws, including social and tax laws, as well as data protection regulations – including EU Regulation 2016/679 of 27 April 2016 (GDPR).

3.1.3. Suppliers undertake to fight all forms of corruption, including extortion, fraud and bribery. They shall not offer GSE team members any undue benefits (free goods or services, contracts or opportunities, kickbacks, etc.) aiming to facilitate their business with GSE.

3.1.4. Suppliers will disclose any situation that could create a conflict of interest or where a GSE team member may have an interest in the supplier's business or a personal financial connection with it.

3.1.5. Suppliers will take preventive measures to avoid any anti-competitive practices or conduct.

3.1.6. Suppliers will respect the confidentiality of information obtained from GSE, which remains the property of GSE, and undertake never to use it for their own benefit. They guarantee compliance with intellectual property rights.

3.1.7. Suppliers will provide accurate and fair information that is not likely to mislead GSE or other stakeholders in the conduct of business.

3.1.8. Suppliers commit to transparency and accountability in their business activities.

More in GSE's Code of Ethics

3.2. Human rights

3.2.1. Suppliers comply with the principles of the United Nations Universal Declaration of Human Rights, the Conventions of the International Labour Organisation (ILO) and the various applicable human rights laws and regulations. They are not complicit in human rights abuses.

3.2.2. Concealed, illegal, forced or compulsory labour, including child labour, is prohibited in all supplier activities. On construction sites, particular attention is paid to the use of undeclared workers. Each worker is duly registered, in accordance with the applicable regulations, with the capacity to work on the site.

3.2.3. Suppliers undertake not to make any distinction, exclusion or preference based on any discriminatory criteria such as age; sex; place of origin; membership or non-membership, real or supposed, of an ethnic group, nation or so-called race; pregnancy; state of health; disability; genetic characteristics; sexual orientation; gender identity; political or philosophical opinions; trade union activities; beliefs or membership or non-membership, real or assumed, of a particular religion; family situation; physical appearance; name; customs; place of residence; loss of autonomy; financial situation; banking domiciliation; or any other characteristic protected by the law and regulations in force.

3.2.4. Suppliers will establish procedures and actions to prevent harassment, including sexual harassment.

3.2.5. Suppliers will comply with all applicable labour laws, including those relating to wages, benefits and working hours.

3.2.6. Suppliers will protect and promote freedom of association, union rights and the right to collective bargaining.

3.2.7. Suppliers will provide their employees with appropriate protective equipment and train them in any practices that ensure health & safety at work. They shall do everything in their power at the workplace to ensure workers' safety. On GSE construction sites, they undertake to comply with all the rules required by GSE to ensure the safety of the personnel on site.

3.2.8. Suppliers help promote the employment of persons with disabilities or those who are excluded from the job market.

3.2.9. Suppliers suggest initiatives that support local economic development.

More in GSE's Human rights & Diversity Code

3.3. Environmental protection

3.3.1. Suppliers comply with all applicable environmental laws and regulations.

3.3.2. Suppliers will strive to meet the global target set by the Paris Agreement to reduce global warming to below 2°C compared to pre-industrial levels, and to pursue the measures taken to contain the rise to 1.5°C. They will seek to reduce their energy consumption and will put in place effective solutions to reduce their CO2 emissions.

3.3.3. Suppliers will reduce their consumption of non-renewable raw materials, preferring materials with low environmental impacts, recycled and/or recyclable, and preferably labelled or certified. They will endeavour to minimise the use of toxic substances or substances harmful to biodiversity.

3.3.4. Suppliers will fulfil their duty to advise their clients and partners by offering and promoting a range of more environmentally friendly solutions.

3.3.5. Suppliers adopt the precautionary principle in dealing with environmental issues. They measure and assess potential environmental risks and take all appropriate measures to avoid, reduce or compensate them, in line with the strategy of "no net loss" of biodiversity.

3.3.6. Suppliers shall take care to avoid all forms of local pollution: discharges into water, air and soil, noise, dust, smells, particles and any other source of pollution.

3.3.7. Suppliers commit to waste reduction in all their activities, as well as to the reuse of materials and the optimization of recycling. They measure and can report their waste generation and recovery figures to GSE.

3.3.8. Where appropriate to their activities, suppliers share with GSE the results of their products' environmental and health assessments (such as the Environmental and Health Declaration Form, in France), to attest in a clear, transparent and accurate manner to their environmental performance throughout their life cycle.

3.3.9. Suppliers make every effort to preserve and develop biodiversity in their operations.

More on GSE's Environmental Code

3.4. Due diligence

3.4.1. Due diligence is "a process that companies should undertake to identify, prevent, and mitigate actual and potential adverse impacts of their operations, supply chains and business relationships, and to be accountable for how these impacts are addressed.

3.4.2. Suppliers undertake to comply in all their activities with French law n° 2017-399 of 27 March 2017 on the due diligence.

3.4.3. In doing so, suppliers shall endeavour to prevent any occurrence of non-compliance with the rules of ethics, human rights and environmental preservation throughout their supply chain, and in general, any violation of human rights & fundamental freedoms, health & safety or the environment.

3.4.4. The requirement of due diligence extends to the activities of their own level 1 and 2 suppliers worldwide.

3.4.5. Suppliers are informed of these requirements in a clear and accessible manner.

3.4.6. Suppliers will establish a monitoring program, procedures for surveillance and control of their suppliers on issues of ethics, human rights, and the environment, and more generally, compliance with the laws in force.

3.5. Customer relationship

GSE has clarified and communicated its relational commitments to its customers through a charter and an action plan based on 7 values: **trust, anticipation, listening, transparency, agility, performance and commitment**. GSE and its suppliers must be aligned in order to achieve shared customer satisfaction objectives.

3.5.1. Trust: keep our promises, give advice and share our convictions.

3.5.1.1. **Agree** to a visit of the production workshops by the GSE Quality Department.

3.5.1.2. **Produce** a workshop progress report **on request.**

3.5.1.3. **Provide GSE** with all necessary and requested documents, before, during and/or after the service**.**

3.5.2. ANTICIPATION: monitor points of vigilance, anticipate slippage

3.5.2.1. **Ensure that your teams are familiar with Kaliti,** and if necessary, request training.

3.5.2.2. **Have the DOEs in digital format** 1 month before acceptance of the work, to give us time to finalize them together for acceptance.

3.5.3. LISTENING: understand customer needs and expectations, speak the same language.

3.5.3.1. **Adapt or develop customized products** to meet customer needs and expectations.

3.5.3.2. **Upstream inspection and validation** of the work to be carried out, with transmission of the report to GSE.

3.5.4. TRANSPARENCY: be transparent about our choices and what is important to the customer.

3.5.4.1. **Transmit and meet deadlines** for subcontractor approval.

3.5.4.2. **Comply with regulations** concerning the declaration of participants.

3.5.5. AGILITY: propose solutions that combine shared profitability and customer satisfaction.

3.5.5.1. When **reservations are lifted**, involve the works supervisor in the post-acceptance meeting to give GSE the action **plan and schedule for rework.**

3.5.5.2. When **reservations are lifted**, provide GSE with a week-by-week register of the people involved.

3.5.6. PERFORMANCE: take care of the job from start to finish.

3.5.6.1. When using "**similar**" **products**, they must have the **same technical**, **performance and quality** characteristics as the defined product.

3.5.6.2. Appoint a **contact person** for the period of the year of **perfect completion.**

3.5.7. COMMITMENT : be present and responsive throughout projects, in the event of reservations and in the management of the project .

3.5.7.1. Provide a d**ocument outlining the maintenance contract** and prepare for its presentation to the customer, **6 weeks before handover**.

3.5.7.2. Identify the Customer's maintenance manager upstream to take part in the presentation of maintenance contracts.

3.5.7.3. To work with GSE in **accordance with the principles set out in this code** throughout the commercial and contractual relationship.

3.5.7.4. To ensure that all its employees, including temporary staff, partners, suppliers and subcontractors, are **aware of and comply with the commitments set out in this code**.

3.5.7.5. Designate one or more representatives within the company who can be contacted in the event of difficulties in applying the commitments described in this document.

3.5.7.6. Communicate throughout the contractual relationship the information needed to monitor compliance with these commitments and take part in an annual review meeting with GSE.



4. GSE's commitments

4.1. Supplier selection

4.2. Ethical practices

4.3. Supplier relations

04

4.1. Supplier selection

4.1.1. In accordance with its Code of Ethics, GSE selects its suppliers on the basis of objective criteria and requires them to fully satisfy the expectations of the company and those of its clients.

4.1.2. GSE guarantees transparency and traceability throughout the purchasing process, and selects its suppliers impartially, based on predefined, explicit and clear criteria.

4.1.3. GSE treats its suppliers fairly. In a call to tender, the same information is provided to all bidders, the same deadlines are requested, and bids are assessed according to the same criteria.

4.1.4. GSE seeks to rely on local suppliers in its purchasing activities, to promote local economic development.

4.2. Ethical practices

4.2.1. GSE prevents potential conflicts of interest. To avoid any potential conflict of interest, buyers and prescribers must act in the interests of GSE, without allowing their personal, family or friends' interests to interfere with their professional decisions.

4.2.2. GSE applies ethical principles of individual behaviour. For all purchases and all calls to tender, buyers and prescribers refuse any gifts or benefits that could affect the awarding of a contract.

4.2.3. GSE respects the confidentiality of technical and commercial information provided by suppliers, as well as their financial and intellectual property rights.

4.2.4. GSE applies the same high standards in its own practices as it does to its suppliers regarding social, environmental, ethical and legal matters. GSE's commitments, spelled out in its codes (ethics, human rights and environmental), are freely accessible on the company website: www.gsegroup.com.

4.3. Supplier relations

4.3.1. GSE treats all suppliers honestly and fairly, regardless of their size and line of business, respecting the principle of fair and open competition.

4.3.2. GSE respects the confidentiality of commercial and technical information provided by suppliers. The company does not disclose information to third parties except when legally obligated.

4.3.3. GSE respects the contractual provisions signed, including payment conditions and schedules.

4.3.4. GSE seeks to build long-term relationships with its suppliers, with a view to joint and continuous improvement. GSE is committed to helping its strategic suppliers improve their performance if it falls short of the required standards.

4.3.5. GSE takes into consideration the global costs and impacts over products' whole life cycle, i.e. the entire manufacturing process, the optimization of packaging, delivery, storage, maintenance, disposal, etc.

4.3.6. GSE seeks to avoid any business dependence between the company and its suppliers that could jeopardize either party. GSE develops methodologies and action plans to detect such situations and take appropriate measures.

4.3.7. GSE implements a responsible purchasing strategy involving collaboration and support to suppliers in improving the environmental and social performance of their offerings.



5. COMMON RELATIONAL COMMITMENTS

05

5.1. Trust

5.2. Anticipation

5.3. Tuning in to client needs

5.4. Transparency

5.5. Agility

5.6. Performance

5.7. Commitment

5.1. Trust

5.1.1. **Inform** the client of the progress on key stages of the preparatory work carried out prior to construction (e.g. in workshops, trials, etc.).

5.1.2. **Make suggestions** for optimization and innovation, both in terms of materials and implementation techniques.

5.2. Anticipation

5.2.1. **Appoint – and if possible, assign exclusively –** workers, supervisory staff, machines and material considered for the operation in the tendering phase and confirm them in the construction phase.

5.3. Tuning in to client needs

5.3.1. Carry out a **systematic analysis of the client's needs & practices**, in addition to standards & performance and in coordination with the other stakeholders on the site, to ensure that the solution delivered is appropriate.

5.3.2. **Share the information required** to understand the client's actual needs and to identify the appropriate technical solution – through joint meetings with the client and conversations between our teams.

5.3.3. Be assiduous, rigorous and active in our **participation in site meetings** – to listen and be heard.

5.4. Transparency

5.4.1. **Inform each other of exceptional events** (and their consequences) that directly impact the worksite and – more broadly – the possibilities or forms of future collaboration.

5.4.2. **Prevent issues and find solutions together** to be presented to the client – not waiting for them to face difficulties.

5.5. Agility

5.5.1. Contribute **our collective expertise and experience** to discussions with third parties (design & engineering offices, etc.) on the implementation of high-performance, agile technical solutions.

5.5.2. Be **flexible** and adapt to the client's change orders.

5.6. Performance

5.6.1. Aim for an **optimum** level of **quality** and **availability** throughout the duration of the contract and particularly during defect rectification and the defects liability period.

5.7. Commitment

5.7.1. Use **all necessary means** to fulfil our contractual commitments and satisfy the client's needs.



6. IMPLEMENTATION

6.1. Internal controls

6.2. Whistleblowing procedure

6.3. Sanctions

06

6.1. Internal controls

Compliance with and application of these rules are mandatory for all GSE team member and suppliers – regardless of their roles and responsibilities. Everyone must exercise vigilance for themselves, their professional relations, their team and anyone placed under their responsibility. Any obstruction of the proper execution of controls and audits, whether conducted by an internal department or a third party (e.g. auditors), as well as any concealment of information in this context, is prohibited and would constitute a serious breach of these rules.

In this context, the Purchasing Department, which oversees supplier relations, ensures that these rules are applied and complied with through the following process (management method, supplier selection and checks):

- Management of a mutually beneficial relationship, fully transparent regarding our Purchasing policy based on the allotment of part of the volume of Purchases to listed partners and the distribution of the rest of the volume to other industry players, with a view to regulating the market for a better shared, more responsible and better organised production

- Development and improvement of the supply chain by seeking to build long-term relationships and a level of collaboration based on an overall approach to cost and an analysis of the value of the services offered.

Internal Process :

-Evaluation of suppliers upon the project's completion, covering areas for improvement and development.

- Creation of a Supplier Monitoring Committee with a rating scheme based on the following criteria:

  - supplier's financial dependence on GSE
  - GSE's financial dependence on the supplier
  - supplier's business and financial situation
  - supplier's work schedule
  - supplier's documentary transparency
  - supplier's operational quality
  - assessment of the anti-corruption process
  - commitment to sustainable development

Process shared with Supply-Chain :

- A questionnaire for suppliers covering :

- An analysis of the environmental impacts of their operational practices (resources used, transformation process, transport, lifespan and products' footprint in use).

- An analysis of their operational practices' impacts on the workforce (occupational health & safety, use of hazardous products, economic sustainability).

Implementation

- An analysis of the economic and social impacts (local employment, respect for intellectual property, supplier development).
- an assessment by Ecovadis or another sustainability rating organisation.

The results obtained in these various aspects of supply chain management and control may lead to visits of sites, requests for additional accounting and financial information and/or action plans on the supplier's part.

6.2. Whistleblowing procedure

Any employee, individual or third party may use the GSE whistleblowing procedure, in compliance with the laws and regulations in force in the country where they reside or work, if they suspect a violation of regulations (anti-corruption, competition law, labour law, etc.) or of GSE's codes and policies.

GSE has established a specific procedure for the protection of whistleblowers. It is freely accessible on our intranet and website.

If team members have concerns about informing their direct supervisor or believe that the reported irregularity may not be followed up appropriately, the whistleblowing procedure provides an alternative method for reporting potential violations.

This reporting system guarantees the complete anonymity of the whistleblower (author of the alert) and of the persons reported (who are presumed innocent), under the conditions laid down by the applicable law.

GSE undertakes to ensure that no whistleblower will be sanctioned, dismissed or subjected to any direct or indirect discriminatory measure, in particular with regard to remuneration, profit-sharing measures or the distribution of shares, training or requalification, assignment, qualification, classification, promotion, transfer or contract renewal, for having reported or testified, in good faith, to facts constituting an offence or a crime of which they may have become aware in the performance of their duties. Any form of reprisal against a whistleblower is prohibited and may, where relevant, lead to disciplinary and criminal sanctions.

A 6 persons ethics committee has been set up to deal specifically with alerts :

Position	Name	Telephone	Email
Chairman	Roland PAUL	+33 (0)4 90 23 74 05	rpaul@gsegroup.com
Director of Risk Management and Audit	Magalie HENGY	+33 (0)4 90 23 85 25	mhengy@gsegroup.com
Ethics Officer	Mario MILANESI	+33 (0)4 90 23 85 56	mMilanesi@gsegroup.com
Human Resources Director	Aurore MALBLANC	+33 (0)4 90 23 74 24	amalblanc@gsegroup.com
Chief Legal Officer	Patrice ROGER	+33 (0)4 90 23 74 44	proger@gsegroup.com
Employee representative	Philippe REY	+33 (0)4 90 23 74 47	prey@gsegroup.com

Reports can be emailed to: alerte.gse@gmail.com

In France, any individual may address the Ombudsman, who will refer them to the appropriate body to receive the alert.

More in GSE's Whistleblower Protection Policy

6.3. Sanctions

It should be noted that these rules, which have been examined and approved by the GSE Management Committee, are imperative and that no-one within the Group may disregard them, whatever their hierarchical level.

Any breach of these rules would constitute misconduct and could be subject to appropriate sanctions and prosecution in accordance with applicable law. In addition, suppliers may be excluded from GSE's tendering process and may be subject to breach of contract.

Such sanctions could include dismissal for misconduct and claims for damages.

If you have any questions or difficulty understanding these rules or their implementation, please contact the Ethics Officer.



7. RISK ANTICIPATION

7.1. Communication

7.2. Training

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7.1. Communication

All workers are expected to be familiar with the Responsible Purchasing Code and the related standard operating procedures – and to behave accordingly.

Information on the Responsible Purchasing Code is an integral part of the induction into GSE's procurement team. Every worker or person concerned is given a copy of the code when they are hired or introduced to the company. It is also available on the intranet and from the Human Resources Department. Team members undertake to read it and comply with its terms.

Suppliers have access to this code on GSE's website. Anyone responding to a call to a tender or a consultation by GSE will be informed of the existence of the code.

A clause in contracts with GSE's suppliers mentions the Responsible Purchasing Code, which is also included as an appendix to contracts. By contracting with GSE, suppliers undertake to comply with the terms of the code.

The Responsible Purchasing Code is published in French and English, to enable all GSE employees and stakeholders to become familiar with it.

Any amendments and additions to this code will be subject to the same procedures of consultation, communication, publicity and filing.

GSE's Responsible Purchasing Code has been in force since 5 December 2018 and was updated on 13 December 2021 and on 1 November 2024.

All persons affected by this code are invited to comment and suggest ways to improve the rules therein. Comments, suggestions and requests should be addressed to the Ethics Officer.

7.2. Training

All employees of GSE's Purchasing Department receive regular, ongoing and appropriate training, including regarding the application of and compliance with the Responsible Purchasing Code. GSE undertakes to train all its buyers in the principles and practices of responsible purchasing.

Any amendment to the code will lead to an update of the training module.

GSE undertakes to communicate regularly the rules of the Responsible Purchasing Code with its employees, in particular of GSE Purchasing Department, but also its partners, in particular its clients and suppliers.

