



SUPPLIER CODE OF CONDUCT

LA FINANCIERE ATALIAN

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ATALIAN GLOBAL SERVICES including each of its business units, affiliates and subsidiaries, (collectively, "ATALIAN" or the ATALIAN Group) is firmly committed to conducting its business with the utmost integrity and in compliance with the letter and spirit of the law.

As an industry leader and responsible company, ATALIAN is keen to assert its position to promote the highest standards of ethics and business conduct wherever it operates.

As a supplier of products and/or services to ATALIAN, your company ("Supplier") is essential to ATALIAN's success. For ATALIAN to provide high-quality services in a responsible and sustainable manner, ATALIAN requires the supplier to comply with this Supplier Code of Conduct (this "Code").

This Code defines ATALIAN's fundamental ethical and business conduct requirements for its suppliers. This Code is not intended to be an exhaustive list of all the requirements with which the supplier must comply, but to provide an overview of them. All references to "laws" in this Code mean all laws, regulations, directives, rules, decrees and governmental orders applicable in all countries in which the Group operates.

Supplier is responsible for ensuring that its directors, officers, employees, agents, representatives, suppliers, subcontractors and other business partners are aware of and comply with the requirements set out in this Code.

Supplier shall promptly notify ATALIAN in writing of any known or suspected violation of this Code. The ethical standards described below are the same as those we apply in our own entities around the world.

Any breach of conduct or any violation of this Code of Conduct by our suppliers or their subcontractors will result in the re-examination and possible termination of the business relationship.

FIGHT AGAINST CORRUPTION

We have a "zero tolerance" policy on corruption and influence peddling. In particular, it is forbidden for any employee or third party to offer, promise, give, solicit or accept any gift, offer or promise that could be assimilated to an act of corruption.

The Supplier shall further fully comply with all applicable anti-corruption laws in the jurisdictions in which it conducts business with or on behalf of ATALIAN. Supplier further certifies that it has implemented adequate procedures and controls to comply with such laws, including by conducting due diligence on its affiliates, subsidiaries, agents, subcontractors, representatives and employees who will work on behalf of ATALIAN and communicating to them the requirements set out in this Code of Conduct or comparable requirements and/or training.

Without prejudice to the generality of the foregoing, the Supplier shall not:

- Engaging in any form of bribery of government officials.
- Engaging in any form of "business" or private sector corruption, including but not limited to "bribes to individuals to obtain or retain business."
- Accept any type of bribes or abusive payments.
- Giving, offering or accepting other forms of bribery, including the handing over of valuables or making facilitation payments.

CONFLICT OF INTEREST

The Supplier must avoid any conflict of interest or any situation giving the appearance of a conflict of interest in the context of its activities with ATALIAN. The Supplier shall promptly report to ATALIAN any actual or potential conflict of interest, such as a direct personal or financial interest in a business decision or in the selection of a supplier. Similarly, the Supplier shall not, without first informing ATALIAN in writing, enter in a business relationship with any director, employee or representative of ATALIAN that could create a conflict of interest.

GIFTS AND GRATUITIES

No gift considered morally inappropriate or indecent may be accepted by an employee of the Group or offered by an employee of the Group to a third party. Gifts must be given as a sign of esteem, courtesy or hospitality and must be in accordance with local customs.

The following gifts can never be accepted or given:

- Cash gift, or cash equivalent like gift cards or gift vouchers.
- Gift prohibited by local law.
- Gifts offered to public figures (elected officials, civil servants, employees of an international organization or a public company, etc).
- Gift not delivered directly to the recipient at their business address
- Gifts given or received for corrupt purposes (e.g., to obtain or retain a business, or to obtain an unfair advantage such as an undue advantage, such as favourable tax treatment).
- Gifts prohibited by the recipient's organization.
- Gifts to family members of customers, suppliers or other business partners.
- Gifts, gratuities or other items that personally benefit the Group's employees, regardless of their value.

FRAUD

Suppliers shall not be involved in any form of fraud or fraudulent activity against or for the benefit of ATALIAN or its stakeholders, including but not limited to dishonest behaviour, forgery, falsification of documents and information, theft, misuse or deletion of records, misappropriation of company assets.

UNFAIR COMMERCIAL PRACTICES

The Supplier shall not engage in illegal anti-competitive conduct or deceptive business practices for any reason, whether on behalf of ATALIAN, the Supplier or third parties.

Accordingly, the Supplier shall never rig bids, set prices, provide or exchange competitively sensitive information from customers, ATALIAN, the Supplier or others (including price, cost and technical data) with ATALIAN's competitors or competitors of the Supplier. The Supplier shall never slander ATALIAN's competitors or the Supplier's competitors, their products or services.

INTERNATIONAL TRADE

Suppliers must comply with all international trade rules and related standards, including but not limited to customs regulations, export controls, transportation rules, sanctions and embargoes, anti-money laundering and countering the financing of terrorism. Suppliers must not engage or attempt to engage in any transaction involving products derived from illegal activity or engage in dealings with designated persons and entities, which are subject to international economic sanctions. Suppliers undertake to act in the event of non-compliance with these rules.

TAX EVASION

ATALIAN requires all suppliers to refrain, and ensure that companies in the supplier group, employees or subcontractors do not engage in any activity, practice or conduct that would constitute a tax evasion offence, facilitation of a tax evasion offence or a failure to prevent a facilitation offence, and that they have and maintain in place reasonable policies and procedures to prevent the facilitation of tax evasion by another person, including employees of the supplier, companies in the supplier group or subcontractors.

LABOUR LAW

The supplier must comply with all applicable laws in the countries where it operates and commit to respecting values and people. The Supplier is responsible for respecting human rights in its operations and will comply with the standards set forth in the United Nations Universal Declaration of Human Rights. The standards set forth in this Code apply to all workers, including, without limitation, temporary, migrant, student, contract, direct employees, and any other type of worker of the Provider. The applicable labour standards are as follows:

1. **Child labour.** The work of children under the age of 15 is strictly prohibited. In countries where local legislation provides for an older age for work or extends compulsory education beyond the age of 15, the higher age will apply. The Supplier will not engage in or condone the illegal employment or exploitation of children in the workplace. Supplier is committed to combating child exploitation and, therefore, prohibits any use of child labour with any supplier, supplier or other provision of the supplier.
2. **Human trafficking, modern slavery and the right to voluntary work.** The Supplier shall respect the free choice of any person and shall strictly prohibit forced or compulsory labour of any employee. Supplier will not do business or associate with third parties who condone or are engaged in the practice of coercion or imposition of labor with little or no freedom of choice. Suppliers will comply with the United Nations Guiding Principles on Business and Human Rights and local laws and policies, such as the UK Modern Slavery Act 2015.
3. **Freedom from prejudice, harassment, abuse and discrimination.** We expect our suppliers to treat their employees with respect and dignity. Supplier will strive to maintain an inclusive workplace free from harassment and discrimination based on a person's status such as race, color, religion, national origin, sex, sexual orientation, gender identity, age, disability, veteran or military status, or other characteristics protected by law.

4. **Safe and secure workplace.** The Supplier is committed to providing a safe, healthy and secure workplace for all its employees, and to preventing accidents for employees, customers and visitors. Vendor management will ensure that this commitment is met in all sites and facilities in which Vendor operates.
5. **Working hours and wages.** The Supplier will comply with all laws relating to the wages it pays its employees and their hours of work. The supplier is committed to being an ethical employer that ensures that labour standards are improved, that the contributions of its employees are respected and that they are fairly rewarded.
6. **Freedom of association.** The Supplier will respect the rights of employees and comply with all laws regarding freedom of association and collective bargaining/agreement.

HEALTH AND SAFETY

Suppliers must comply with all health, safety and security laws of the jurisdictions in which they operate and limit worker exposure to hazards for safety.

When necessary to perform work safely, the supplier must provide workers with appropriate personal protective equipment and ensure that this equipment is properly maintained. Providers will record, track, and report all occupational injuries and illnesses as required by applicable laws.

ENVIRONMENT AND SUSTAINABILITY

The supplier must respect and comply with all applicable environmental laws and implement an effective policy that promotes resource efficiency and energy-efficient and environmentally friendly solutions.

Suppliers must take a proactive approach to working with ATALIAN to reduce our environmental impact.

ATALIAN therefore requires its suppliers to share its commitments:

- Continuously improve our environmental performance and results and review them regularly.
- To aspire to provide products and services that improve ecology and ecosystems.
- Waste and emissions into the air and water are subject to specific treatment and particular attention will be paid to hazardous waste and emissions.
- People whose activities have a direct impact on the environment are trained, competent and have the necessary means to carry out their mission.
- Suppliers must have a written environmental and sustainability policy appropriate to the size and nature of their operations, which addresses the prevention, limitation and control of significant environmental and health impacts of their activities.

DATA PRIVACY AND INFORMATION SECURITY

If the Suppliers act as data controllers of personal data, they undertake to comply, on behalf of ATALIAN, with all applicable data protection laws and regulations, to follow the principles of the ATALIAN Group's Data Protection Policy, to ensure that all personal data processed by the Suppliers according to ATALIAN's instructions or to which the Suppliers have access due to their activity with or on behalf of ATALIAN, remain confidential, are used only for the purposes defined by ATALIAN, are adequately protected and, in particular, that there are appropriate legal, organizational and technical measures to guarantee such protection.

The Suppliers will inform ATALIAN as soon as they receive a request to exercise the rights over the personal data of the data subjects or to execute the requests or orders of the competent authorities regarding the personal data they manage in the context of the relationship with ATALIAN.

If providers need to transfer Personal Data processed under ATALIAN's instructions outside the European Union, they must implement appropriate measures for greater data security and, in particular, establish with any processor all appropriate safeguards, including the standard contractual clauses provided by the European Commission.

As an organization, ATALIAN ensures compliance with the provisions of ISO 27001. ATALIAN expects its suppliers to conduct their business in a way that recognizes the importance of information security and makes it a priority. ATALIAN will periodically monitor compliance with the provisions relating to confidentiality and data protection that the suppliers undertake to comply with when contracting with ATALIAN.

CHARTERS

ATALIAN has been a member of the United Nations Global Compact since 2012. ATALIAN is a signatory of the Diversity Charter (2014) and the Caring for Climate declaration (2015).

WHISTLEBLOWING

Suppliers are expected to allow all their employees to report any suspected wrongdoing as soon as possible in order to provide all employees with guidance on how to raise these concerns; to ensure the confidentiality of the whistleblower, the person involved, and the information provided; have the best possible answer; and, to organize the protection of the whistleblower against possible reprisals.

PROMOTING THE PRINCIPLES OF THIS CODE

Suppliers undertake to promote the above principles to their own suppliers, service providers and/or subcontractors. Suppliers also undertake to ensure that their own suppliers, contractors and subcontractors comply with all the principles supported in the Code.

ATALIAN COMPLIANCE CONTROL

Suppliers acknowledge and agree that they are solely responsible for the full compliance of their directors, officers, employees, representatives, suppliers, contractors and other business partners with this Code.

Suppliers will nevertheless allow ATALIAN and/or its representatives to assess the suppliers' compliance with the expectations of this Code when providing services or benefits. Suppliers will nevertheless allow ATALIAN and/or its representatives to assess suppliers' compliance with the expectations of this Code when performing services or products for ATALIAN. Suppliers will be required to maintain sufficient archiving to demonstrate compliance with this Code of Conduct. Suppliers will fully cooperate with ATALIAN in such assessments and will promptly correct any non-conformities found in such assessments.

Any breach or breach of this Code by suppliers or their subcontractors will result in a review and possible termination of the business relationship.

If this Code is in contradiction with the terms of a supplier's contract with ATALIAN, and the terms of the contract are more restrictive than this Code, suppliers must comply with the more restrictive terms of the contract.

ATALIAN'S BUSINESS PARTNER ALERT SYSTEM

Anyone wishing to report behaviour that does not comply with ethical or legal rules can refer to ATALIAN's internal whistleblowing policy, which can be accessed at the following address: <https://ATALIAN.com/our-compliance-commitments/>. »

ACCEPTANCE OF SUPPLIER CODE OF CONDUCT TERMS

On behalf of (name of the company), whose registered office is at
..... (address of the registered office),

- I confirm that (company name) has received and read the Code of Conduct for ATALIAN suppliers
- I confirm that (company name) shares the same ethical standards as those set out in this Code by ATALIAN
- I am aware that (name of the company) must immediately inform ATALIAN in the event of the identification of incidents within your operations or supply chain, in relation to our common ethical principles communicated in the ATALIAN SUPPLIER CODE OF CONDUCT, which could have a negative impact on our reputation as an ethical company or that of ATALIAN

..... [Full Name],

..... [Title/ function] duly declaring himself

authorized for the purposes hereof.

Signature

Done at [place]

Date.....