



# **PURCHASING CHARTER**

26/11/2021

**CSR - POL\_PUR\_110\_AC**

Changes from previous version:

- Introduction page 1 before signatures
- Modification Chapter I/6), I/8), II/1), II/2), III/2) et III/3)
- Add chapter V/
- Add last page, self audit questionnaire

The purpose of this charter is to formalise our corporate social responsibility expectations with our suppliers, so that the principles stipulated in it can be respected at all levels of the purchasing and supply chain.

This charter reflects the social and environmental commitments that our Group, SAINT JEAN INDUSTRIES, has espoused for many years and includes the social principles set forth by the Universal Declaration of Human Rights and the International Labour Organisation.

By signing this charter and/or our company's General Terms and Conditions of Purchase and/or any purchasing contract concluded with our company, the Supplier agrees to abide by and ensure compliance with the principles set forth therein.

---

The Supplier acknowledges having read all the provisions of the charter below and agrees to apply the latter's principles throughout its company and, where applicable, in its subsidiaries throughout the world.

The Supplier formally agrees to respond to evaluation questionnaires in a transparent manner and to submit to audits of its various sites, or those of its subsidiaries, carried out by our company or by a mandated third party.

The self-assessment questionnaire at the last page must be filled within one month from the receipt of this charter. Without answer, Saint Jean Industries reserves the right not to place purchase any further orders to the Supplier.

Company:
Name:
Position:
Date:
Signature:

## **I/ Respect of Social Principles**

### **1) Promotion and respect of internationally recognised human rights**

The Supplier agrees to respect human rights in all countries in which it operates, including places where the affirmation of human rights is still inadequate.

The Supplier shall take care to avoid situations or acts of complicity that violate fundamental human rights.

The Supplier affirms its responsibility to respect human rights and promote respect of said rights throughout its supply chain.

### **2) Freedom of association and the effective recognition of the right to collective bargaining**

The Supplier recognises trade unionism and the right of all workers to form trade unions of their choice, anywhere in the world. It shall ensure respect for trade union independence and pluralism.

The Supplier also agrees to protect trade union members and officials and to avoid discrimination against trade unions.

The Supplier agrees to promote collective negotiation as a central element of social dialogue.

### **3) Elimination of all forms of forced and compulsory labour**

The Supplier acknowledges the principle of free choice of employment.

Under no circumstances shall the Supplier resort to forced, compulsory, or slave labour. Work is considered forced, compulsory, or slave labour whenever it is imposed by way of a threat (food deprivation, confiscation of land, non-payment of salary, physical violence, sexual abuse, involuntary prison labour, etc.).

### **4) Effective abolition of child labour**

The Supplier shall refrain from employing children in violation of international labour organisation conventions.

### **5) Elimination of discrimination with respect to employment and occupation**

The Supplier shall refrain from discriminating based on race or ethnic origin, gender, religion or belief, political opinion, trade union activity, disability, age, or sexual orientation with respect to recruitment and career development and shall ensure equal treatment.

### **6) Remuneration and career management**

The Supplier agrees to ensure that the wages and remuneration paid correspond to at least the statutory minimum wage and occupational minimum wage.

The Supplier recognises the principle of equal pay between men and women and does not discriminate based on gender.

The supplier implements a career management policy in order to develop its employees, both in the interests of the company and of the employee, thus encouraging his motivation.

### **7) Working Hours**

The Supplier agrees to ensure that working hours are always equal to or less than the number of working hours established by the national legislation or collective agreements of the country in question.

The Supplier agrees to respect rest periods and periodic holidays under conditions no less favourable than those established by national legislation or collective agreements.

### 8) **Respect for physical and mental health and safety at work**

The Supplier agrees to ensure that effective prevention-based occupational health and safety policies are implemented in its various establishments. These policies should be in the form of concrete action plans, involve everyone according to responsibility level, and include social partners.

The SUPPLIER undertakes to ensure that none of its employees will be subjected to repeated acts of psychological harassment, the purpose or effect of which is to worsen their working conditions in such a way as to infringe their rights and dignity, to impair their physical or mental health or to jeopardise their professional future.

## **II/ Environmental Protection**

### 1) **Environmental quality management system**

The Supplier shall implement a management and continuous improvement policy in its industrial facilities for the preservation of the environment and the reduction of its energy and water consumption, but also the preservation of air quality and the reduction of waste. It also agrees to implement reliable and regular control systems.

### 2) **Research and development policy**

The Supplier agrees to steer its R&D policy towards consistent product and/or service evolution in order to achieve an ever-higher level of respect for the environment, whether in its production tools, in the materials used, in the use of energy for production, in the logistics related to product transport, or in reducing the use of chemicals in favour of solutions with an environmental contribution.

## **III/ Respect for ethical principles**

### 1) **Prohibited substances and materials**

Products purchased from the Supplier—whether standard or developed specifically for our company—must comply with the legislation and regulations applicable in the country of manufacture as well as in the zones/countries where these products are to be marketed or used with regard to the prohibition, use restrictions, and/or traceability of substances of concern for the protection of health or the environment. Most notably, they must comply with the European REACH regulation.

### 2) **Discouraging the use of minerals from conflict zones**

The Supplier guarantees transparency on the origin of minerals used, especially those from conflict zones, including tin, tantalum, tungsten and gold.

### 3) **Fair trade practices and protection against reprisals**

The Supplier agrees to comply with all applicable laws on corruption, including the “U.K. Bribery Act” and the French “Sapin 2 Law”.

It agrees, for itself and on behalf of its subcontractors or other third parties, to refrain from engaging in any form of commercial bribery, or directly or indirectly providing or offering to provide any goods of value to or for the benefit of any official or employee of a government authority, or of an entity owned, controlled by or affiliated with a government authority, in order to obtain or retain any contract, business opportunity or other commercial advantage, or to influence any act or decision of that person in his or her official capacity.

The Supplier agrees to become familiar and comply with applicable competition rules and to refrain from engaging in any anti-competitive practices. The Supplier must autonomously determine its market conduct and commercial policy in order to maintain healthy competition between all players.

The Supplier shall ensure that its employees avoid any conflict between the interests of their company and their personal interests or those of their relatives, and ensures compliance with whistleblowing and protection against reprisals in the sustainability policy towards suppliers.

The Supplier guarantees the confidentiality of exchanges and the protection of information communicated by our company.

The Supplier agrees to respect intellectual property rights and effectively cooperate in the fight against counterfeiting.

Within the framework of transparency necessary for fair trade practices, the Supplier undertakes to respond with transparency and sincerity to all requests for information.

#### **4) Respect for animal welfare**

In the context of its supply chain, the Supplier agrees to abide by and ensure compliance with the five freedoms of animal welfare formalised by the World Organisation for Animal Health.

#### **5) Respect for legality**

More generally, the Supplier shall comply with all current laws and regulations in all countries where it operates. It also agrees to comply with national standards in the field of fundamental human rights, ILO conventions, and international environmental conventions applicable to its activity and products.

#### **6) Respect for personal data**

The Supplier agrees to comply with regulations in force concerning the collection and use of personal data, in particular the European regulation known as the GDPR. No use or processing other than that provided for contractually may be implemented by the Supplier.

### **IV/ Control of subcontracting**

The Supplier agrees to apply the principles of this charter throughout its supply chain. It agrees to make its suppliers aware of corporate social responsibility issues and implement a responsible purchasing policy that respects these principles. It shall implement due diligence measures with regard to its own subcontracting chain.

### **V/ Supplier assessment**

On the basis of the questionnaire completed by the Supplier, Saint Jean Industries shall assess compliance with this Charter. Depending on the outcome, Saint Jean Industries reserves the right to request further action and/or to visit the Supplier to establish an action plan.

Saint Jean Industries will request updates to the CSR situation from the Supplier. Each new request will restart the Supplier validation process. In the event of non-compliance or a partially satisfactory result, Saint Jean Industries reserves the right not to place any further orders with the Supplier.

I - OBJET: This document is a formular of the instruction sheet FIG\_PUR\_120

## Self-assessment questionnaire CSR (Corporate Social Responsibility)

**COMPANY :**

**Stamp:**

**Name of the representative:**

**Position:**

**Date:**

**Signature**

Is the CSR approach committed within your company?

Yes  No

Is your company certified ?

**Certification ISO 14001 ?** (Environmental management systems)

If no do you begin an approach?  
If yes what is the deadline?

Yes <input type="checkbox"/>	Send the certificate to SJI	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No	<input type="checkbox"/>

**Certification ISO 27001 ?** (Information security management systems)

If no do you begin an approach?  
If yes what is the deadline?

Yes <input type="checkbox"/>	Send the certificate to SJI	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No	<input type="checkbox"/>

**Certification ISO 45001, (MASE, OHSAS 18001)?** (Health and security at work)

If no do you begin an approach?  
If yes what is the deadline?

Yes <input type="checkbox"/>	Send the certificate to SJI	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No	<input type="checkbox"/>

**Do you have a CSR label?** (Corporate Social Responsibility)

If no do you begin an approach?  
If yes what is the deadline?

Yes <input type="checkbox"/>	Send the CSR label to SJI	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No	<input type="checkbox"/>

### ENVIRONMENTAL: (If you are certified ISO 14001= Don't answer)

Does your Company have an Environmental Policy?

Yes  No

If yes, which items

- Monitoring and reduction of energy consumption
- Monitoring and Reduction of GHGs (Greenhouse Gas)
- Monitoring and Reduction of Water Consumption
- Local pollution
- Raw material, Chemicals and Waste?
- Health and Safety of Consumers?
- Biodiversity?

Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>

Do you know if an external company makes an audit

Yes  No

Do you know if your company have a project to cancel the dangerous products

Yes  No

### GUIDANCE ON SOCIAL RESPONSIBILITY (If you have a CSR Label= Don't answer)

Does your Company have a human resource and human rights Policy?

Yes  No

If yes, which items

- Health and Safety of Employees?
- Working conditions ?
- Social dialogue ?
- Child Labor, Forced Labor?
- Discrimination, Harassment?
- Human rights ?

Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>

Does your Company have ethics Policy?

Yes  No

If yes, which items

- Anti-corruption and Extortion?
- Conflicts of interest ?
- Fraud?
- Money Laundering?
- Anti-competitive practices?
- Information security ?
- Conflict Mineral

Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>
Yes <input type="checkbox"/>	No <input type="checkbox"/>

**General observations, Comments,...**