

#1

CHOICE OF PARTNERS

Our commitments

- All internal buyers and ordering parties or any person whose duties within the group lead him to be in contact with external interlocutors, must act within the scope of his responsibilities, in accordance with the principle of loyalty and in compliance with all legal provisions and national and international regulations.
- All internal buyers and ordering parties or any person in contact with external interlocutors must act solely for the interests of the company.
- Suppliers and subcontractors must be selected through open and fair competition conducted impartially on the basis of objective criteria, unless a situation is likely to generate conflicts of interest. All suppliers referenced and under contract with one or other of the Group's companies must re-submit a bid at least every 3 years and be invited to participate in an open tendering process.
- In their professional relations with the suppliers and subcontractors of the **ERAM Group**, buyers, ordering parties and Group staff must show respectful and courteous behaviour, whatever the situation.

What we do not do

- Impose abusive conditions on our partners.
- Continue to work with partners who repeatedly fail to meet our expectations or do not respect our ethical principles, in particular regarding human rights and/or the fight against corruption.
- Behave unfairly in the management of tenders.
- Select, after a call for tender, the provider/supplier who was not the best.
(best value = provider / supplier providing the required level of service at the best price).
- Voluntarily place a partner in a situation of dependency so as to obtain better conditions.

#2 CORRUPTION AND MONEY LAUNDERING

Our commitments

Corruption

- Corruption is the act of proposing or granting to a private person or a public official, but also to solicit or accept from these same persons, an undue advantage in exchange for a favour, whether in France or abroad.
- Corruption in all its forms runs contrary to the values of the ERAM Group. It is therefore entirely prohibited for any entity, any employee and in any domain or territory in which any of its entities work.
- All employees must demonstrate integrity and transparency in carrying out their professional activities and act in accordance with the laws and regulations covering the prevention of corruption and influence peddling.
- The **ERAM Group** also undertakes to condemn all acts of this nature of which it is aware, including facilitation payments, that is to say, informal payments (as opposed to duties and taxes) made to public officials to execute or accelerate certain administrative formalities, such as applications for building permits, visas or customs procedures.
- Facilitation payments are a form of corruption and assimilated as such in most countries, including France.
- The **ERAM Group** undertakes to respect the terms of the Sapin II law. Whistleblowers are subject to protection under the conditions provided for by that law. Reports falling within the scope of the Sapin II Law are the responsibility of the Ethics Committee, under the conditions mentioned below.

Money laundering

- The **ERAM Group** ensures that all information contained in its financial and other documents is accurate. This commitment is essential to the honest, efficient and lawful conduct of its activities. The **ERAM Group** and all its employees must ensure that their activities are not used to «launder» funds from illicit activities.
- In the event that the **ERAM Group** becomes aware of such acts, it undertakes to refer the matter to the competent authorities for the purposes of sanctioning such actions.

RELATIONS WITH OUR PARTNERS

What we do not do

- Accept or solicit benefits of any kind in return for professional actions.
- Propose or give money or anything of value to representatives of public authorities, trade unions or political parties (directly or indirectly through a known party or other entity) for the purposes of obtaining an advantage.
- Seek a commercial advantage (or accept such an advantage) in return for a gift, donation, service or any other form of benefit.
- Use intermediaries (commercial agents, consultants, lobbyists, etc.) to do what the **ERAM Group** does not have the right to do or which is forbidden in light of the foregoing.
- Sell, transfer or dispose of Group property without the necessary authorizations or documents.
- Accept cash transactions, except for small transactions and in-store payments.
- Conceal payments through third parties.



During a call for tenders, the sales representative of a supplier seeks to obtain a contract by giving luxurious gifts and paying the personal expenses of the buyer.

During an administrative authorization procedure, an elected representative requests one of his children be hired at a store in exchange for the acceleration of the application process.

A customs officer demands a bribe to deal with the clearance of containers expeditiously.

#3 CONFLICTS OF INTEREST

Our commitments

- A conflict of interest is a situation in which the personal interests (financial, family, moral...) of an employee may differ from those of the Group and therefore affect his or her objectivity.
- No Group staff with the ability to influence the type or the volume of business conducted with a supplier, partner, service provider or sub-contractor of the group may maintain commercial, financial or personal relations with said supplier, partner, provider or subcontractor, placing it in a potential conflict of interest situation.
- Employees must inform their superiors in the event that they are in a situation of real or potential conflict of interest or when they occupy a position or function or hold financial interests in any organization that may be a competitor, a customer, a supplier or a partner of one of the Group's entities.
- Employees must spontaneously withdraw from decisions for which their impartiality may be called into question.

What we do not do

- Conceal information about conflicts of interest.
- Take decisions about providers and subcontractors dictated by interests other than those of the company.
- Own shares in companies that may be suppliers, customers or partners of the group without declaring them.
- Promote, when recruiting or placing a call for tenders, a candidate due to relationships that could constitute a conflict of interest.
- Use your position or function for personal gain or for your loved ones.



An employee has a "face to face" meeting with a spouse or a relative employed in an organization related to the Group (supplier, partner, relationship with the administration).

An employee holds a financial interest (including via a relative) in a company with which the Group has business relations through the employee concerned.

#4

GIFTS AND INVITATIONS

Our commitments

- Gifts and invitations from **ERAM Group** employees must be given in a transparent manner and in compliance with all applicable laws and procedures.
- The appearance of the impartiality and neutrality of all employees of the **ERAM Group** must always be preserved such that no situation casts doubt on the integrity and impartiality of **ERAM Group** employees.
- Gifts or benefits in kind from third parties to employees, whether personal, whether money, property, services, entertainment, travel, or any other form of gift, are prohibited except for courtesy and low-value items.
- Invitations to events for which transport and accommodation costs are paid by third parties, prospects or suppliers, must be approved by the management.
- If for cultural reasons it is impossible to refuse a gift, it must be declared to the Department Manager and shared with the department.

What we do not do

- Give or accept gifts or invitations that are not symbolic or a demonstration of courtesy.
- Use one's position within the **ERAM Group** to obtain a gift or personal benefit.
- Receive or give cash gifts, donations, monetary loans or similar.
- Give or accept a gift that, due to its nature and/or amount, could cause an employee to fail to act in the best interests of the **ERAM Group** or risk putting the ERAM Group in an embarrassing situation, or which would create a feeling of indebtedness.



As a reward for an order, the sales representative of a supplier offers a purchasing department employee a trip with a disproportionate value.

An employee regularly asks that his suppliers offer him gift vouchers.

#5

RESPECT FOR INTELLECTUAL PROPERTY RIGHTS

Our commitments

- The **ERAM Group** undertakes to respect the rights of third parties regarding their protected works within the meaning of the regulations in force in each territory in which the group operates, whatever they may be. In this respect, an internal procedure has been put in place to ensure these rights are respected by the style teams, internal purchasing staff and by our suppliers and subcontractors.
- The **ERAM Group** undertakes, in particular, in case of proven infringement of the rights of a third party by one of its entities, to implement all appropriate measures aimed at stopping such actions.

What we do not do

- Knowingly copy an original work belonging to a third party.
- Continue to market a product that has been proven to infringe the rights of others.

#6 RESPECT FOR HUMAN RIGHTS BY OUR PARTNERS

Our commitments

The ERAM Group undertakes to only use suppliers or service providers who respect human rights in their relations with their employees and, in particular, have made the following commitments:

- The supplier/provider must ensure that no person under the age of 15 (or who has not passed compulsory school age if he/she is of age in that country) is recruited or present at the production site.
- Juvenile workers (between the ages of 15 and 18) must be clearly identified and monitored. They may not work overtime or night hours, or work in positions that pose a risk to their physical or mental integrity. For example, they may not work at stations that use chemicals or require heavy loads to be carried.
- Workers must voluntarily provide their services and be free to travel (on and off the site), as well as to terminate their relationship with their employer at reasonable notice. No work is to be done under threat or duress.
- The supplier/provider must treat its employees with dignity and respect. No treatment that harms the physical or moral integrity of employees will be tolerated.
- Freedom of association is a human right: every employee must be free to create or join a union or to negotiate for a group of employees he represents without fear of retaliation by the management. The employer may not obstruct their activities at the site outside of working hours.

RELATIONS WITH OUR PARTNERS

Our commitments

- No distinction, exclusion or preference may be made in recruitment, remuneration, training or professional advancement based on criteria other than competence (race, caste, sex, origin, religion, disability, sexual orientation or political orientation, membership of a trade union...).
- Migrant workers must have all documents required by the country in order to work legally. Furthermore, these workers will enjoy the same rights, working conditions and benefits as local employees.
- Female employees who take maternity leave may return to their position following said leave with the same wages and benefits.
- The supplier/provider must guarantee payment of the minimum wage defined by local regulations or industrial standards, if it is higher, as well as all social benefits (social contributions, insurance, paid leave...). Salaries must be paid directly to workers without an intermediary, no financial penalties may be deducted from this salary.
- The accumulated weekly hours may not exceed a working time considered to be reasonable. The week must include at least 24 consecutive hours of rest per 7-day period. Overtime must always be voluntary and paid at the rate defined in the applicable regulations. Workers paid by the part are not excluded from these requirements.

What we do not do

- Use a supplier who refuses to make the commitments stipulated above.
- Continue to work with a supplier/service provider that has been reported for serious breaches of these commitments and that does not submit an action plan for return to compliance.