

**PROCUREMENT CYCLE
SUPPLIER CODE
OF CONDUCT**

AXIAN GROUP

AXIAN

LET'S GROW TOGETHER

CHARTER

As a key player in the sub-region, AXIAN Group invests over the long-term in strategic and structuring sectors for national and regional development.

To support AXIAN Group in its development, it offers all vendors, producers, and service providers the same opportunities to work and “grow together” for a winning partnership, in a transparent framework and with a spirit of innovation, in view of delivering the best products and services to the population and customers.

This Charter applies to all AXIAN Group companies.

This Code of Conduct has been developed based on AXIAN Group’s values and the principles of fundamental rights and takes into account international labor and environmental standards. All suppliers of goods and/or services must subscribe to the values of this Code of Conduct, as outlined below:

1 - SCOPE

The provisions of this Code of Conduct apply to all our suppliers and service providers, whether natural or legal persons.

The principles of this Code of Conduct apply, and must be communicated by suppliers to their employees, parent company, subsidiaries, affiliates, and subcontractors in the local language and in a manner that is most understandable to all.

2 - CONTINUOUS IMPROVEMENT

The provisions set forth in this Code of Conduct define the minimum standards expected of our suppliers. Suppliers are committed to taking the necessary steps to continually improve the working conditions of their employees.

ETHICS AND PROFESSIONAL CONDUCT

1 - CORRUPTION

AXIAN Group expects its suppliers to comply with moral and ethical standards.

Suppliers shall comply with national and international legislation. Corruption in any form, including but not limited to extortion, fraud, or bribery, is strictly prohibited.

2 - CONFLICTS OF INTEREST

AXIAN Group expects its suppliers to disclose any situation where they may appear to have a conflict of interest. They must disclose:

- any situations where an AXIAN Group employee may have any interest of any kind in the suppliers' business or any economic or family ties with them;
- any situations where an AXIAN Group employee solicits the supplier to obtain some gratification in exchange for favoring the supplier's offer.

In this regard, AXIAN Group provides its suppliers with an e-mail address to report any breach of the ethical rules set out in this document by its employees.

3 - GIFTS AND INVITATIONS

For ethical reasons, gifts, and other invitations, other than product presentations, of an estimated value of €100 (one hundred Euros) or the equivalent amount in local currency, received from suppliers must be declared by the recipient employee to his or her Human Resources Department.

4 - POLITICAL CONTRIBUTIONS

Suppliers shall not make cash gifts or provide monetary benefits to parties beyond what is permitted by law.

5 - MONEY LAUNDERING

Suppliers shall take all reasonable measures to prevent money laundering within its sphere of influence.

6 - DATA SECURITY AND PROTECTION

Suppliers shall comply with all applicable laws related to data protection, as well as any specific data protection and security requirements set forth in the Contract.

WORK

1 - FREEDOM OF UNION AND COLLECTIVE BARGAINING

Suppliers shall ensure that their employees, without distinction, can freely exercise their right to organize, their right to further and defend their interests, and their right to bargain collectively, and that they protect their workers against all forms of discrimination in word or deed that might undermine the exercise of their right to organize and bargain collectively.

2 - FORCED AND COMPULSORY LABOR

Suppliers who use forced or compulsory labor in any form will be immediately excluded from AXIAN Group's list of suppliers.

3 - CHILD LABOR

AXIAN Group expects its suppliers to apply Article 32 of the United Nations Convention on the Rights of the Child, which prohibits child labor.

In this regard, Suppliers shall respect:

- a. the prohibition on employing children under the age of 14, or under the minimum age of employment specified in the legislation of the country where the activity is carried out, or the age at which compulsory schooling ceases in that same country.
- b. the prohibition on employing persons under the age of 18 for any work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of such persons.

If a child be found to be working on a Supplier's premises, the Supplier will immediately take steps to remedy the situation and seek to serve the best interest of the child.

AXIAN Group reserves the right to terminate the contract with any supplier that fails to comply with the Convention referred to above.

4 - DISCRIMINATION

AXIAN Group expects its suppliers to ensure equal opportunities and equal treatment in matters of employment and occupation without discrimination on the grounds of race, color, sex, religion, political opinion, national extraction or social origin, or on any other grounds recognized by the national legislation of the country or countries in which the contract is partly or wholly performed.

5 - WAGES, WORKING HOURS AND OTHER WORKING CONDITIONS

AXIAN Group expects its suppliers to ensure the payment of wages in legal tender, at regular intervals no longer than one month, or according to the terms of the employment contract, in full and directly to the workers concerned. Suppliers shall keep an appropriate record of such payments. Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law, regulations or collective agreement, and suppliers should inform the workers concerned of such deductions at the time of each payment. The wages, hours of work and other conditions of work provided by suppliers should never be less favorable than the best conditions prevailing locally, i.e., as contained in collective agreements or applicable local labor laws.

6 - HEALTH, WELFARE AND SECURITY

Suppliers shall ensure that their employees have social and medical coverage in order to comply with the labor laws of the countries of operation and with generally recognized international standards.

Suppliers shall:

- a. ensure that the workplaces, machines, equipment, and work processes under their control do not present any risks to the safety and health of workers, and implement the necessary preventive measures;

- b. provide competent personnel and comply with the Group's training requirements for the personnel under their responsibility;
- c. provide workers with basic and specific personal protective equipment (PPE) to protect them from chemical, physical, and biological substances and agents used in the workplace.

ENVIRONNEMENT

1 - ENVIRONMENTAL PROTECTION

Suppliers are expected to take into account environmental issues, promote greater environmental responsibility, and encourage the development and dissemination of environmental-friendly technologies.

Suppliers are encouraged to implement an environmental management system that complies with current international standards and best practices for environmental protection. Suppliers should support initiatives to ensure greater environmental responsibility and promote waste recycling.

2 - CHEMICALS AND HAZARDOUS MATERIALS

Chemicals or other materials that pose a hazard if released into the environment must be identified and dealt with in a manner that ensures safety during handling, transportation, storage, recycling, or reuse.

3 - WASTEWATER AND SOLID WASTE

Wastewater and solid wastes from suppliers' commercial operations, industrial processes, and supplier sanitation shall be monitored, controlled, and treated appropriately prior to discharge or disposal.

4 - ATMOSPHERIC EMISSIONS

Emissions into the atmosphere of Volatile Organic Compounds (VOCs), aerosols, corrosive materials, particulate matter, ozone-depleting substances, and combustion residues from supplier operations shall be analyzed, monitored, controlled, and treated appropriately prior to release or discharge.

5 - REDUCTION OF WASTE PRODUCTION AND RECYCLING OPERATIONS

Suppliers are expected to commit to reducing waste, including water and energy, by ensuring that all types of waste are reduced or eliminated at the source, including through changes in production and maintenance processes, facility management practices, material substitution, conservation, recycling, and reuse of materials.

HUMAN RIGHTS

1 - HUMAN RIGHTS

Suppliers shall make every effort to uphold and respect internationally established human rights. They shall ensure that they are not complicit in any human rights violations.

2 - HARASSMENT AND BRUTAL OR INHUMANE TREATMENT

Suppliers are encouraged to develop a working environment in which all employees are treated with dignity and respect and do not resort to any form of threat of violence, sexual exploitation, or abuse. Verbal or psychological harassment is prohibited and inhumane treatment and corporal punishment in any form, or threat of any kind, will not be tolerated.

BUSINESS PRACTICES

1 - FREE COMPETITION

Suppliers must be committed to compliance with competition law applicable in their host countries. This includes prohibiting abuse of dominant position, concerted practices, or unlawful agreements between competitors.

2 - CUSTOMS AND SECURITY AUTHORITIES

Suppliers must be committed to compliance with applicable customs laws, including those relating to imports and the ban on transshipment of merchandise to the importing country.

3 - TRADE RESTRICTIONS AND INTERNATIONAL SANCTIONS

Suppliers must commit to respecting international trade restrictions and sanctions, taking into account any changes in these rules, as well as all laws and regulations concerning export controls.

CONTROL AND AUDIT

1 - CONTROLS

AXIAN Group reserves the right to confirm compliance with the principles set out in this Charter and to conduct compliance audits of its suppliers and their own suppliers and subcontractors.

AXIAN Group suppliers must provide all necessary information and facilitate access by the Group's representatives seeking to verify compliance with the requirements herein. Suppliers must commit to improving or correcting any deficiencies identified.

Suppliers may also assist their suppliers in implementing and applying best practices in order to resolve minor non-conformity issues.

2 - ACCURATE RECORDS AND ACCESS TO INFORMATION

Suppliers are required to keep proper records to demonstrate compliance with this Supplier Code of Conduct. They must provide AXIAN Group representatives with access to complete, original, and accurate records.

CONTACT

Any questions relating to this Code of Conduct should be directed to the Supplier's usual contact persons, who will handle the request or have it handled.

Any failure by an AXIAN Group employee to comply with the principles set forth in this document must be reported by the Supplier to the following address: audit@axian-group.com

Upon receipt of such reports, the Group's Internal Audit teams will carry out any necessary investigations to establish the facts of the case, with due regard to the anonymity of the Supplier, who may nevertheless be called upon during the process.

AXIAN Group encourages its suppliers to improve their business practices in accordance with the principles set out in this Code of Conduct.

Any failure to comply with this Code of Conduct will be taken into account in the periodic evaluation of suppliers and may result in the blacklisting of the supplier involved.

Date and place:

Name and address of Supplier:

Name and position of Supplier's representative:

Signature preceded by the mention "Read and approved":

Company seal: