

COMMERCIAL PARTNERS' ETHICS & COMPLIANCE CHARTER



The subsidiaries of Groupe Roullier are committed to an Ethics & Compliance Programme based on the underlying principles of Respect, Responsibility and Integrity. These principles guide our actions. We expect from our commercial partners that they will abide by the below mentioned commitments in their business and interaction with us. We are committed and so shall also be our commercial partners to ensure a sustainable and fruitful collaboration between us.

1. Respect of people's rights

We are attached to the respect of people's rights at work and to the human values of respect for private life, promotion of diversity and equal opportunities. We expect that our partners act in the respect of international standards regarding work environment and non-discrimination.

2. Respect of the health, safety of people and the Environment

We are committed to a proactive and responsible health and safety prevention policy for our people, our sites and their potential environmental impacts. We encourage our partners to guarantee working conditions that take into consideration people's health and safety and to minimize their activities' environmental impacts.

3. Respect of personal data

We pay particular attention to the processing of personal data collected, in the respect of the General Data Protection Regulation (GDPR) and more globally relevant data protection regulations. We expect from our partners that they guarantee a lawful and loyal processing of personal data, including those of our employees, in compliance with the GDPR or equivalent, depending on the country they belong to.

4. Combatting fraud, corruption and influence peddling

We implement a "zero tolerance" policy regarding fraud, corruption – including "unlawful facilitation payments" – and influence peddling in accordance with international standards and local regulation applicable to our activities. In particular, our employees are not authorized to offer to a third party nor to accept something of value, directly or indirectly, to refrain from or perform an act, as part of their duties. We expect from our partners that they strictly comply with those standards and commit to firmly banish all these practices within their business and, if so, accordingly to commit to our ethic and compliance certificate.

5. Fair Competition

We reject any agreement or practice having an anticompetitive object or effect on the market, including, without limitation, any practices of fixed prices, collusion on prices, volumes or market opportunities. The commitment of our commercial partners to strictly comply with antitrust regulations is fundamental.

6. Respect of confidentiality and intellectual property

We are particularly sensitive to the protection of confidential information and to the respect of intellectual property rights. Our partners shall commit to proceeding with caution and taking reasonable care to the protection of our confidential information and intellectual rights on our products, trademarks and industrial process.

7. Preventing conflicts of interest

Our employees commit to acting, as part of their professional duties, according to our subsidiaries' interest, not in their own personal interest. We expect from our partners that they refrain from and/or declare any relationship or personal interest likely to, directly or indirectly, prevent them from taking a fair and impartial decision.

8. Respect of international economic sanctions

We pay careful attention to French and international regulations regarding international economic and financial sanctions, including embargos and freezing of assets of our partners or counterparties. The same level of attention and respect of international regulation is expected from our partners in the context of transactions involving our products or any of our subsidiaries.

9. Compliance of raw materials and products

We carefully pay attention to quality, security and traceability of raw materials integrated in our products and have in place quality plans and compliance standards. We expect our suppliers to do so.

10. Sustainable commercial relationship

As part of the sourcing of our partners, we expect them to comply with the same level of commitments than ours and honour their contractual commitments.

Respect of these commitments is fundamental; non-compliance with it may, depending on the nature of the breach, call into question the relationships with us.

Any questions, requests for information or suspicions of non-compliant practices can be addressed to:

compliance@roullier.com.