



## Supplier Code of Conduct

Version 2024-03

### DEFINITIONS

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**“Suppliers”** mean suppliers or service providers of goods or services under an agreement with the Crédit Mutuel Arkéa group.

The **“Crédit Mutuel Arkéa group”** means the various Crédit Mutuel Arkéa entities, its federations and subsidiaries.

The Crédit Mutuel Arkéa group’s Supplier Code of Conduct (the **“Code”**) brings together all the requirements set by the Crédit Mutuel Arkéa group for its suppliers in terms of human rights, employment rights and human capital development, business ethics and respect for the environment.

### INTRODUCTION

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As a cooperative and regional banking group, the Crédit Mutuel Arkéa group places societal and environmental issues at the heart of its practices.

Having signed the United Nations Global Compact at the end of 2015, the Crédit Mutuel Arkéa group is committed to respecting its 10 principles around human rights, international employment standards, the fight against corruption and respect for the environment. It is also committed to promoting the UN Sustainable Development Goals (SDGs).

Having signed the Responsible Supplier Relationship Charter on 28 June 2017, the Crédit Mutuel Arkéa group is also committed to adopting responsible purchasing practices in order to promote sustainable and balanced trust-based relationships.

Echoing this company commitment and its obligations under the duty of care, the Crédit Mutuel Arkéa group also expects its suppliers to engage in conduct and practices consistent with these same principles. Eager to engage in constructive dialogue and make continuous improvements, the Crédit Mutuel Arkéa group’s goal is to work with its suppliers to achieve responsible economic growth.

This Code sets out the Crédit Mutuel Arkéa group’s requirements with regard to its suppliers. It is based on international initiatives and principles such as the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact and the SDGs, the OECD Guidelines and the fundamental conventions of the International Labour Organization (ILO). It also incorporates the best practices expected by the Crédit Mutuel Arkéa group, particularly with regard to human rights, employment rights and human capital development, business ethics and respect for the environment. Each supplier also undertakes to comply with the laws, regulations and standards of the countries in which it operates and that apply to its business activities. The undertakings set out in this Code supplement rather than replace them.

### OPERATIONS

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Acknowledgement of the Code by suppliers is an essential condition of any purchasing or services agreement with the Crédit Mutuel Arkéa group. It supplements the provisions set out in the General and Special Terms and Conditions of purchasing and service agreements.

Suppliers must agree to meet these commitments in all areas of their sphere of responsibility, in particular by exercising reasonable care in their relationships with their permanent or temporary employees and their own suppliers and service providers with whom they work in providing the relevant service to the Crédit Mutuel Arkéa

group. Suppliers must ensure that the commitments set out in this Code are communicated to such persons. If a supplier identifies breaches of the Code's commitments by its own suppliers or service providers, it is required to take the necessary measures or terminate the relationship until the breach is remedied.

The Crédit Mutuel Arkéa group also reserves the right to assess its suppliers' practices via a Corporate Social Responsibility questionnaire. Depending on the nature of the services or based on an evaluation of suppliers' responsible practices, the Crédit Mutuel Arkéa group may carry out additional audits to assess the extent to which their practices are consistent with the commitments set out in the Code. Suppliers agree to cooperate with these audits on conditions to be agreed with the Crédit Mutuel Arkéa group.

If the Crédit Mutuel Arkéa group becomes aware of any breaches of the commitments set out in this Code, it will ensure that suppliers implement the necessary corrective actions to comply herewith.

The Crédit Mutuel Arkéa group reserves the right to terminate any purchasing or service agreement in the event of a serious and/or repeated breach by a supplier of the commitments set out in the Code. This is without prejudice to any damages that may be sought by the Crédit Mutuel Arkéa group.

## **UNDERTAKINGS OF THE CODE**

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Suppliers agree to comply, as a minimum, with the undertakings described below and to implement a proactive approach to make progress on these issues. As human rights, employment rights and human capital development, business ethics and respect for the environment are key aspects of the subcontracting chain, suppliers undertake to use their best efforts to ensure that their own suppliers and service providers comply with the commitments set out below.

### **Human rights**

The Crédit Mutuel Arkéa group expects its suppliers to respect human rights in all their relationships with their stakeholders, whether those stakeholders are customers, employees, external partners, suppliers or service providers.

#### **No use of forced labour**

Suppliers must not use or derive any benefit from forced labour in accordance with ILO conventions 29 on forced labour and 105 on the abolition of forced labour. All labour must be provided voluntarily and be freely chosen.

#### **No use of illegal labour**

Suppliers must not employ workers illegally or engage in the illegal supply of workers. Suppliers must also comply with all conditions and formalities under employment laws when engaging seconded employees.

#### **No child labour**

Suppliers must not use child labour as defined by ILO Conventions 138 on minimum age and 182 on the worst forms of child labour and domestic laws, the most exacting standard taking precedence over others.

#### **Non-discrimination**

Suppliers undertake to comply with all laws and regulations prohibiting discrimination in their business relationships, in particular with regard to hiring and employment, based on criteria such as origin, gender, age, religion, political affiliation, social background, trade union affiliation, health, sexual orientation, skin colour or any other characteristic protected by law. They must be committed to promoting equal treatment and diversity among their employees.

#### **Respect and protection of personal data and privacy**

In all their business relationships, suppliers undertake to comply with the laws in force on the protection of personal data and to use personal data responsibly. Suppliers also agree to respect their employees' right to disconnect and their employees' and other persons' right to privacy, and to a balance between their private/family life and their work activities.

#### **No harassment and violence**

Suppliers undertake to put measures in place to prevent and detect harassment and any other form of violence (physical, psychological, verbal or sexual violence, etc.) against their employees. In the event of proven cases of harassment or violence, they also undertake to introduce measures to support employees.

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## **Tackling sectarianism**

Suppliers undertake to introduce initiatives to monitor, prevent and detect sectarianism, both internally (among employees) or externally (among service providers). When detected, they undertake to intervene to put an end to such sectarianism and to notify the appropriate authorities (MIVILUDES, the Prefecture, the Professional Association, the Gendarmerie/Police, etc.).

## **Employment rights and the development of human capital**

The Crédit Mutuel Arkéa group expects its suppliers to comply with employment laws (and the fundamental conventions of the International Labour Organization (ILO)) and to commit to developing their human capital. Suppliers' entire supply chains must comply with the ILO's fundamental conventions.

### **Remuneration**

The remuneration paid to suppliers' employees must comply with the legal or sector minimum or the remuneration terms set out in freely negotiated collective bargaining agreements, the most exacting standard taking precedence over others.

### **Working hours and leave**

Suppliers must comply with all applicable laws, regulations and industry standards regarding working hours, rest and leave. Suppliers also undertake to take account of issues experienced by their employees in achieving a balance between their work and personal lives.

### **Health and safety**

Suppliers undertake to offer their employees healthy and safe working conditions, in accordance with prevailing laws, regulations and industry standards, with the aim of preventing and protecting their employees from the risks of occupational accidents. Suppliers must also pay particular attention to raising their employees' awareness and training them about safety. Suppliers also agree to be vigilant to psychosocial risks and to promote the quality of life at work. They also undertake to respect the right of employees to refuse to work in dangerous situations, without any consequence or penalty.

### **Right to freedom of association and collective bargaining**

Suppliers' employees must benefit from the right to freedom of association and collective bargaining in accordance with all prevailing laws and regulations. Suppliers undertake to promote social dialogue.

### **Training**

Suppliers undertake to train their employees so that they have the skills required to properly carry out their duties.

## **Business ethics**

The Crédit Mutuel Arkéa group is committed to carrying out its business competently, diligently, loyally and fairly. It expects its suppliers to also ensure that their activities and relationships with their stakeholders comply with these principles. Suppliers must commit to complying with prevailing domestic and international laws and regulations on best practices and ethical conduct, combating corruption, conflicts of interest, free competition and respect for intellectual property rights. They also undertake to comply with the laws and regulations applicable to their business activities.

### **Best practices and ethical conduct**

Suppliers undertake to comply with the best practices and ethical conduct associated with their profession when carrying out all their business activities.

They also undertake to carry out their business activities with integrity, loyalty, objectivity, fairness and transparency towards the Crédit Mutuel Arkéa group.

### **Sales practices**

Suppliers undertake to use sales practices that comply with Articles L. 121-8 et seq. of the French Consumer Code and Articles 223-15-2 et seq. of the French Criminal Code, which seek to protect vulnerable persons and prohibit fraudulent practices and the exploitation of vulnerabilities.

#### **Safety of products and services**

Suppliers undertake to comply with the safety and quality standards applicable to their products and services.

#### **Anti-corruption measures**

Suppliers represent that they strictly comply with the anti-corruption laws applicable to the public and private sectors. In this respect, suppliers and their employees, agents and officers shall refrain from offering or receiving, where they have no entitlement, directly or indirectly, offers, promises, gifts, presents or advantages of any kind, for them or for others, to induce them to carry out or refrain from carrying out or facilitating an act in breach of their legal and/or professional obligations and/or obligations under the agreement.

#### **No conflicts of interest**

Suppliers and the Crédit Mutuel Arkéa group shall avoid all conflicts of interest. In the event of a potential or actual conflict of interest, suppliers must immediately inform the Crédit Mutuel Arkéa group. The Parties will jointly determine, on a case-by-case basis, any measures to be taken to end such potential or actual conflict of interest.

#### **Free competition**

Suppliers must carry out their business activities in accordance with prevailing competition laws, comply with the principle of free competition and refrain from any unfair or misleading commercial practices or any abuse of a dominant position.

#### **Combating fraud and promoting tax transparency**

Suppliers undertake to comply with laws on tax transparency and must not enter into any arrangements that directly or indirectly seek to circumvent laws or use any illegal processes aimed at avoiding any or all of their tax liabilities.

#### **Respecting intellectual property rights**

Suppliers agree to comply with the rules on the protection of intellectual property rights and to take appropriate steps to safeguard and protect the confidential and exclusive information exchanged. Such information shall only be used for the purposes set out in the agreement. In the case of subcontracting agreements, the Crédit Mutuel Arkéa group's consent is required to the sharing of confidential and/or exclusive information. Suppliers must also hold all intellectual property rights relating to their products/services or all necessary authorisations. Suppliers must not engage in any plagiarism.

#### **Respect for the environment**

The Crédit Mutuel Arkéa group is concerned about its own environmental footprint and, given the urgency of combating climate change, also expects its suppliers to comply with all applicable environmental laws, regulations and industry standards and to demonstrate that they are making continual improvements to their environmental impact, both in their day-to-day activities and in relation to their products and services.

#### **Limiting greenhouse gas emissions and climate impacts**

Suppliers undertake to limit greenhouse gas emissions from their business activities and from their products and services, in particular by favouring low-carbon solutions and by raising employee awareness of climate-related issues.

#### **Protection of natural resources and biodiversity**

Suppliers must strive to optimise their use of natural resources and reduce the negative impact of their business activities and their products and services on natural resources and biodiversity, in particular by promoting eco-design principles and the use of renewable and recyclable raw materials.

#### **Limiting waste and preventing pollution**

Suppliers undertake to identify, control and treat their waste and effluent production in order to prevent air, water and soil pollution. They also undertake to use their best efforts to reduce waste and encourage recycling.

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Suppliers shall also pay attention to other forms of pollution that may be generated by their activities and that may impact their stakeholders, such as noise or light pollution, and undertake to comply, as a minimum, with prevailing standards.

## DIALOGUE, MEDIATION AND ALERT MECHANISM

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With a view to promoting mediation, and in accordance with the commitments made by signing the Supplier Relations and Responsible Purchasing charter, the Crédit Mutuel Arkéa group has appointed a purchasing mediator to whom disputes concerning buying processes may be referred by suppliers, if such disputes are unable to be otherwise resolved.

Contact: [mediateur.achats@arkea.com](mailto:mediateur.achats@arkea.com).

Suppliers also have the possibility of contacting an external mediator (the business mediator). The request to open a procedure by this mediator is made online, on the following Internet page:

<https://www.economie.gouv.fr/mediateur-des-entreprises>

Pursuant to French Law No. 2017-399 of 27 March 2017 on the duty of care of parent companies and sub-contracting companies, the Crédit Mutuel Arkéa group has put in place an alert mechanism for serious human rights, health/safety and environmental breaches. Any natural or legal person outside the Crédit Mutuel Arkéa group, who finds themselves in a position to alert about such a risk, can send an alert via the tool accessible on the institutional website [cm-arkea.com](http://cm-arkea.com).

In accordance with the French Law No. 2016-1691 of 9 December 2016 (also called SAPIN II Law), the Crédit Mutuel Arkéa group has put in place a professional alert system which aims to prevent, detect, correct or even sanction conduct or situations contrary to regulations and/or the group's code of conduct. The professional alert system allows everyone to participate in controlling the risk of non-compliance and fighting corruption within the Crédit Mutuel Arkéa group. A summary of the professional alert system is available on the institutional website [cm-arkea.com](http://cm-arkea.com). Any natural person, linked to the Crédit Mutuel Arkéa group and affected by the system, who finds themselves in a position to alert about such situations, can send an alert via the system accessible on the institutional website [cm-arkea.com](http://cm-arkea.com).

## UPDATES TO THE CODE

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**INFORMATION:** This document is a translation of the original document “Code de conduite du fournisseur” redacted in French, available on our website. In case of contradiction between the original French version and the English translation, the original French version shall prevail.

The French version of the Code may be updated by the Crédit Mutuel Arkéa group on a regular basis. The current version is available at [cm-arkea.com](http://cm-arkea.com).