

# ***Code of Conduct for Camusat Suppliers & Subcontractors***



*Making sustainability a smart choice  
for telecom networks*

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*Camusat is one of the most important players in the telecommunications network deployment, with an extended geographical footprint, offering turn key solutions to our customers.*

*As such, Camusat develops collaborations and partnerships with many suppliers of equipment and services throughout the world.*

*In the frame of its activities, Camusat acts in accordance with the Group's Code of Ethics and Anticorruption Policy available on the Camusat website (<https://www.camusat.com>) and in accordance with its Sustainable Procurement Policy.*

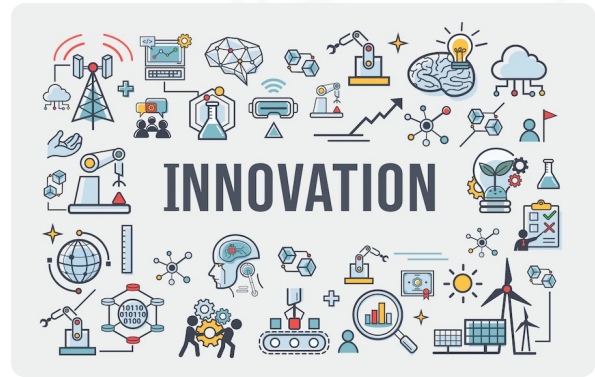
*Camusat is committed to sustainable development in all its areas of activity and to the respect of the highest ethical standards. In fact, Camusat is actively involved in the recognition of local communities and helps promoting their economic and social development while ensuring the respect of human rights, dignity, culture and the protection of natural resources in the areas where it conducts its operations.*



*In terms of purchasing and procurement, Camusat develops its activities around three main guidelines:*

### **Apply a High Level of Requirement**

- *By choosing products and services of a high-quality level*
- *By developing a panel of suppliers adapted to the evolving markets*
- *By ensuring the safety of our employees/partners and respecting our commitments in terms of CSR in our selection process*

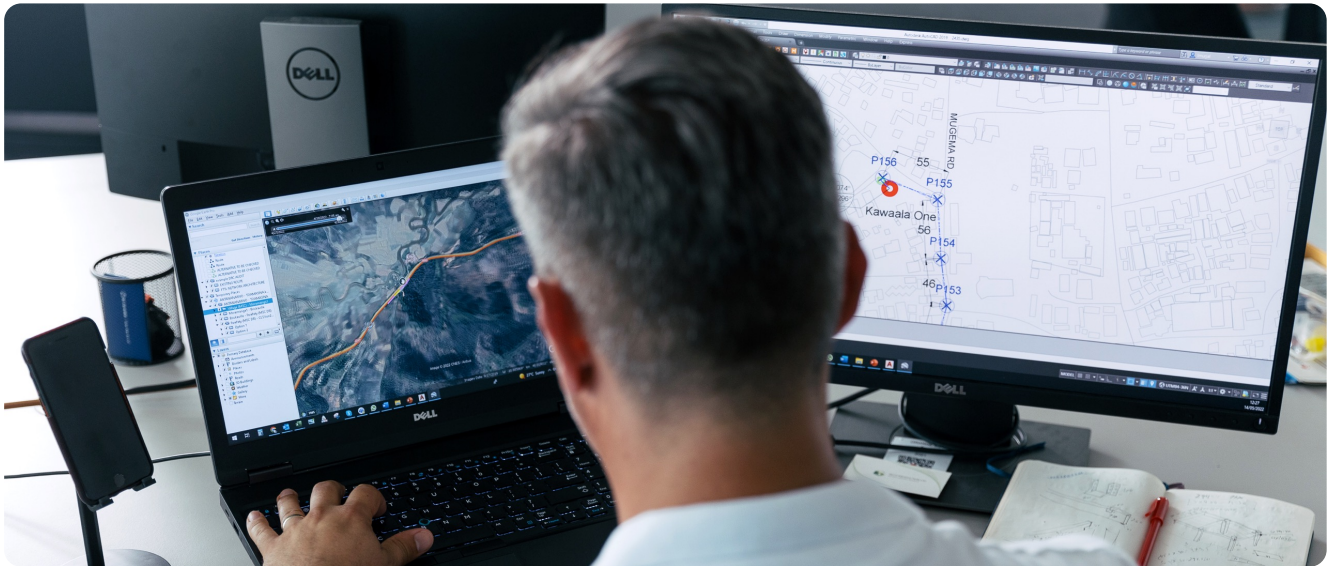


### **Be at the Service of the Project**

- *By integrating the procurement function from the early stages of the project,*
- *By contributing to the competitiveness of our subsidiaries by seeking the best quality/deadline ratio,*
- *By always being the most reactive in our supply lead times.*

### **Innovate for the Future**

- *By developing partnerships with leaders in their field of expertise, integrating from the initial stage in our research and development process and in our industrialization stages,*
- *By working on the continuous improvement of all our purchasing process and the use of our tools.*



*Our Suppliers (equipment suppliers, service providers and subcontractors) play an important part as enablers of our sustainable growth and overall success. That is why Camusat requires that all Suppliers who work or intend to work with us also adhere to our values and respect the principles defined in this Code of Conduct.*



*Camusat requires each Supplier to adopt the highest level of transparency and integrity in the procurement and logistics process and endeavors to apply such principles throughout the performance of its obligations. The Supplier or potential Supplier must also strictly comply with all applicable laws and regulations, in particular those related to environmental and social matters and to the prevention of and fight against corruption, money laundering and the financing of terrorism.*

*Camusat's Suppliers operate in different regulatory and cultural contexts. Therefore, the standards set forth in this Code of Conduct will serve as the benchmark for acceptable conduct. Where applicable local laws impose less restrictive obligations on a Supplier, the Supplier will comply with the standards of this Code of Conduct. Where applicable local laws impose more restrictive obligations, the Supplier will comply with such laws and regulations.*





# 1. Compliance with International and National Laws

## Guiding Principles and International Law

*Camusat expects and requires the Supplier to comply with the United Nations Guiding Principles on Business and Human Rights (UNGP).*

*The Supplier must likewise commit to respect the United Nations Global Compact, to which Camusat has adhered since 2014 and which marks its commitment to respect and promote good practices in the field of human rights, labor, health and safety, environmental protection, anti-corruption and data protection.*

*The principles of the Global Compact, detailed in this Code of Conduct, define, together with the Group's Sustainable Procurement Policy, the mandatory guidelines in the commercial relations between the Supplier and Camusat.*

*The Supplier must also undertake to respect the Universal Declaration of Human Rights and the fundamental labor principles and rights guaranteed by the International Labor Organization. Camusat has zero tolerance to the involvement of the Supplier, at any degree and of any kind, in the violation of Human Rights. The Supplier must respect the dignity of the person, the privacy and the rights of each individual. Slavery in all its forms is strictly prohibited.*



## National Laws

*The Supplier must comply with all applicable laws and regulations of the country in which it operates. The Supplier undertakes to make available to Camusat evidence of all permits, clearances, licenses and registrations required by law for the Supplier to meet its obligations and must keep them up to date. The operational and documentary requirements necessary to obtain these authorizations must be strictly respected.*



## 2. Social Responsibility

### **Interdiction of Child Labor**

*The Supplier undertakes to act in accordance with local employment laws and the international standards of the International Labor Organization (ILO). The Supplier must under no circumstances use child labor and will make sure that its employees are of the minimum legal age in the country in which it operates.*

*The Supplier will take all necessary measures to ensure the compliance of its entire supply chain and undertakes, in any event, not to offer products that have been manufactured by children, or in violation of the interdiction of illegal labor or in violation of International Labor Standards defined by ILO.*

*The Supplier must ensure the respect of professional equality between women and men and promote inclusion, diversity, equal opportunities and treatment of employees and never penalize, harass or discriminate against them because of their skin colour, race, nationality, political affiliation and orientation, social origin, disabilities, sexual orientation, marital status, age, religious beliefs or sex.*

### **Interdiction of Forced Labor**

*The Supplier undertakes not to practice forced or compulsory labor, including, but not limited to debt collection labor. The Supplier assures that the working relationship between the Supplier and its employees is freely chosen and free of threat and that the Supplier never requires workers to deposit money, identification papers or any other similar demand in order to obtain or keep their employment.*

*The Supplier ensures that all workers are free to leave their employment following a legal notice.*

### **Equality and Non-discrimination**

*The Supplier must oppose unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination of any kind.*

*The Supplier undertakes not to violate any employment discrimination law, which is defined as a distinction, exclusion or preference with respect to recruitment, hiring, firing, wages, working conditions or employment, based on an individual's personal characteristics that are unrelated to the inherent requirements of the job or that interfere with equal opportunity or treatment in employment.*



## **Trade Union Rights, Freedom of Association and Collective Negotiations**

*The Supplier must comply with the local law with respect to the activities of labor organizations and work councils and their organizational activities. The Supplier must recognize and respect the rights of employees to associate freely, to organize and to negotiate collectively, in accordance with the local laws and ILO core conventions.*

## **Remuneration and Working Hours**

*The Supplier must maintain a wage and benefit policy that complies with the applicable laws and regulations of the country in which it operates and/or the collective negotiated agreement or contract that governs its workers, and comply with minimum wage requirements.*

*The Supplier must establish work schedules and overtime policies consistent with the provisions of maximum work hours and work week laws, rest period requirements, overtime requirements, vacation requirements, holiday requirements, and other requirements under the local laws. The Supplier will not use wage deductions as a disciplinary measure.*

*In the absence of national regulations, ILO standards must apply. In particular, remuneration must be sufficient to cover basic needs and the normal working week must not exceed 48 hours, excluding overtime which may not exceed 12 hours.*

*The Supplier will provide all workers with clear documentation, in a language they understand, explaining the terms and conditions of employment that apply to them, including hours of work, wages and payment terms, and informing them of their rights and responsibilities. Such documentation will be made available by the Supplier upon request to demonstrate compliance with this Code of Conduct.*

## **Health and Safety**

*The Supplier will provide a safe and healthy workplace for its workers and ensure that all work is performed in accordance with the applicable health and safety legislation, including the implementation of proper safety procedures, training, preventive maintenance and protective equipment. The Supplier will ensure that actual and potential hazards to the health and safety of workers are identified, assessed and eliminated or managed to mitigate their impact and prevent occupational accidents and illnesses.*



*The Supplier is encouraged to implement an Occupational Health and Safety Management System, based on international standards.*

*The Supplier must strive for continuous improvement in health and safety by regularly reviewing and updating its health and safety programs and practices to maintain compliance with laws and industry standards. The Supplier must demonstrate such compliance both at the bidding stage and throughout the duration of the contract, and will implement an appropriate monitoring, control, audit and review system to demonstrate such compliance.*





## 3. Business Ethics

Camusat does not tolerate corrupt, fraudulent, collusive and anti-competitive practices of any kind involving its resources, human and/or otherwise, at any level of its organization. Camusat expects and requires the same level of commitment and compliance from its Supplier and its supply chain. In the event of failure to do so, Camusat will immediately intervene and take all appropriate measures.

### **Prevention and Fight against Corruption and the Traffic of Influence**

As part of its Anticorruption Policy, Camusat has reiterated its commitment to conduct its business with integrity and transparency and to have no tolerance for corruption.

Corruption is criminally reprehensible conduct by which a person solicits, agrees to or accepts a gift, offer or promise, presents or benefits of any kind in order to perform, delay or omit to perform any act directly or indirectly related to his or her duties. This includes "kickbacks", "bribes", extortion, facilitation payments and laundering of all these practices.



Traffic of influence is the act, by anyone, of soliciting or agreeing, at any time, directly or indirectly, to offers, promises, gifts, presents or advantages of any kind, for oneself or for others, in order to abuse or have abused his real or supposed influence with a view to obtaining from a public authority or administration distinctions, jobs, contracts or any other favourable decision.

In compliance with the regulatory requirements of the French "Sapin II" law, Camusat is committed to implementing an anti-corruption compliance program adapted to its specific activities.

The Supplier must likewise comply with all applicable anti-bribery laws, including, where applicable, the US Foreign Corrupt Practices Act and the UK Bribery Act.

The Supplier will not directly or indirectly engage in corrupt practices and/or traffic of influence, or in any activity that may involve Camusat in corrupt practices. The Supplier will not, directly or indirectly, obtain or receive from business partners or public officials any favour or thing of value in exchange for a business advantage, or offer them.

### **Fight against Money Laundering and Financing the Terrorism**

Money laundering processes are designed to make earnings from illegal activities appear legitimate. The Supplier will not engage in money laundering activities, including any activity that conceals or is intended to conceal such activities. The Supplier will not fund or support illegal activities such as terrorism, tax evasion or fraud.

The Supplier will complete in good faith all documents requested by Camusat and will be solely and fully responsible for all the provided information.



## **Fair and Non-discriminatory Competition**

*The Supplier will conduct its business in accordance with the principles of fair competition and will not intentionally enter into and/or be part to any of the following: antitrust agreements, forbidden covenants and other acts of unfair competition and will not use or abuse any dominant position, if any.*

*Camusat encourages fair competition in the marketplace and requires its Supplier to comply fully with all applicable antitrust and competition laws and to actively seek to avoid situations that might suggest or create a different appearance.*



## **Conflict of Interest**

*Camusat expects its Supplier to declare any conflicts of interest that may affect the performance of the assignment entrusted to it, as Camusat's decision to contract with the Supplier must be based solely on the commercial benefits of the provided products and services and not on any form of advantage induced by a conflict of interest.*

*At the same time, the Supplier will refrain from offering Camusat's employees any money, valuable gifts, loans, rebates, valuables or any other form of improper benefits.*

*Camusat expects its Supplier to act with the same level of responsibility as its employees and to comply with the Group's Code of Ethics which sets out clear rules regarding conflicts of interest. The Supplier undertakes to report any perceived or actual conflict of interest of which it is aware, both on Camusat's side and on its own. In this case, the Supplier must send an alert to the Camusat Group Ethics Manager at the following email address: [ethics.alert@camusat.com](mailto:ethics.alert@camusat.com).*

## **Privacy, Data Protection and Intellectual Property**

*Camusat protects the data of its Suppliers and Customers as if it were its own. Our corporate culture is based on principles such as security, data protection and confidentiality of information. We constantly seek to take appropriate technical and organizational measures to ensure the security of personal data.*



*On its turn, the Supplier will comply with all the applicable data protection laws when collecting, processing, storing or handling the personal data of any person, including, but not limited to, its own employees and the employees of its customers, suppliers and business partners.*

*The Supplier will also protect all intellectual property rights, trade secrets and proprietary information of Camusat.*



## 4. Environment

*Camusat is committed to making a contribution to the improvement of our environment, as well as to the preservation of natural resources and their responsible use. Each year, Camusat publishes its ESG Report outlining its commitment to contribute to a better future.*

*In order to also contribute to this commitment, the Supplier is required to act in an environmentally responsible manner in order to prevent or significantly minimize the environmental impacts of its activities, preserve natural resources and biodiversity.*



*The Supplier will ensure the compliance with the applicable environmental protection legislation, act responsibly to prevent pollution by implementing appropriate emergency response plans and methods, and ensure the disposal of all waste generated through a verifiable traceability system.*

*The Supplier will take the necessary steps to conserve, recycle and make efficient use of the natural resources necessary for its operations and take energy measures to reduce emissions of greenhouse gases and other pollutants.*

*Camusat strongly encourages its Supplier to implement an effective Environmental Management System adapted to the nature and scale of its activities in order to measure, correct and continuously improve.*

*Camusat actively and continuously invests in training its employees in environmentally friendly business practices and therefore expects its Supplier to implement relevant environmental training programs for staff and management.*

*Camusat may ask its Supplier to submit its annual ESG/CSR report.*



## 5. Final Provisions

### **Applicability**

*By entering into an agreement with Camusat and/or any of its affiliates, the Supplier explicitly agrees to abide by and follow this Code of Conduct in a manner appropriate and proportionate to the nature and scope of its activities, the products it supplies and the services it renders. The Code of Conduct is in addition to, and not in substitution for, the provisions of any legal agreement or contract between Supplier and Camusat.*

*The Supplier is also fully responsible for the compliance with this Code of Conduct of its own supply chain (subcontractors, partners, their employees, etc.).*

*The Code of Conduct applies throughout the commercial relationship between Camusat and/or its subsidiaries and the Supplier.*

### **Monitoring and Control**

*Camusat will have the right to periodically request from its Supplier all documents proving that it conducts its activities in accordance with and in compliance with the provisions of this Code of Conduct.*

*The Supplier agrees to cooperate fully with any investigation or audit by Camusat regarding its compliance with the Code of Conduct, including by providing personnel, access to its facilities and relevant documents and/or its authorized representatives, while respecting the rights of third parties.*

*The Supplier will promptly report to Camusat any concerns and/or actual or potential violations of the Code of Conduct, including through its supply chain. It will take appropriate corrective action if necessary.*

*No retaliation may be taken against any employee or third party for reporting actual or suspected non-compliance with the Act or this Code of Conduct.*

*Non-compliance with the provisions of this Code of Conduct by the Supplier, its employees/subcontractors/affiliates with direct or indirect links to Camusat and/or its subsidiaries, may result in the immediate termination of the business relationship between the Supplier and Camusat and/or its subsidiaries.*



contact : [public.relations@camusat.com](mailto:public.relations@camusat.com)  
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