

ses imagotag



# Supplier Code of Conduct

**ses** imagotag

# Overview of the company

Dear suppliers,

SES-imagotag is a fast-growing retail technology company. The company was founded in 1992 and is listed on the Euronext Paris Stock exchange. The company is the world leader in IoT solutions for the physical retail sector, serving major retailers in Europe, Asia and the Americas.

SES-imagotag's mission is to use technology to modernize the physical retail sector. This means supporting retailers with their digital transformation to:

- help them better manage and control their stores;
- make them ultra-connected and efficient;
- while enabling a truly omnichannel in-store shopping experience.

SES-imagotag believes in sustainable innovation that will serve our customers and stakeholders well into the future through four shared value-creation goals:

- 1. Facilitate more sustainable business operations;**
- 2. Promote positive social impact;**
- 3. Make SES-imagotag an appealing environment for our employees, suppliers, partners and investors;**
- 4. Apply the highest standards of governance.**

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# Introduction to the Supplier Code of Conduct

This Supplier Code of Conduct outlines the legal and business ethical standards to be respected by SES-imagotag and its suppliers. The Code provides a general overview of business ethics along with the factors SES-imagotag feels are key to ensuring compliance with our shared social and environmental responsibilities.

This Code also reaffirms the importance of:

- complying with laws and regulations;
- operating fairly and with integrity;
- while creating a respectful environment.

The key principle of our procurement policy is working with suppliers that respect applicable national and international laws governing the protection of human rights, the environment, labor standards, anti-corruption efforts, fair competition and data privacy. All SES-imagotag suppliers are expected to adhere to the principles in this Supplier Code of Conduct.

SES-imagotag also encourages suppliers and partners to go beyond mere legal compliance and to draw upon best practice globally in terms of business ethics and social and environmental responsibilities.



This Supplier Code of Conduct is not intended to be exhaustive. It is instead intended to help suppliers take the necessary steps to meet SES-imagotag's expectations. This may include reviewing current performance levels and drawing up improvement plans. Furthermore, it may be an opportunity to establish a process of ongoing improvement with respect to the standards outlined in this Supplier Code of Conduct.

Furthermore, SES-imagotag urges contracted suppliers to use this document as a guide for implementing their own principles with their own subcontractors and suppliers, including employment agencies.

All business activities must thus be conducted in a manner that is compatible with this Supplier Code of Conduct.

# Responsibilities of SES-imagotag's Suppliers



## I. COMPLIANCE WITH THE LAW AND HUMAN RIGHTS

SES-imagotag expects its suppliers to always and strictly comply with all applicable national and international laws and technical standards. This includes the **UN Global Compact** and other major international conventions governing human and labor rights.

the threat of penalty. This includes, but is not limited to, human trafficking, slavery or servitude, debt bondage, forced prison labor or forced overtime. Workers should not be forced to deposit identity papers, lodge deposits or security payments. Suppliers may also not withhold the identity papers of migrant workers.

Furthermore, workers are free to withdraw from their employment contracts in line with national laws, without fear of retaliation or penalty.



## II. WORKPLACE AND WORKING ENVIRONMENT

### 3. Discrimination Harassment or Abusive Behavior

Hiring and employment-related decisions must be based on relevant and objective criteria.

### 1. Child Labor

SES-imagotag rejects all forms of child labor. Its commitment is aligned with the principles outlined in the **International Labor Standards** on Child Labor issued by the International Labor Organization (ILO). This includes Convention 128 on the Minimum Age of Employment and Convention 182 on the Worst Forms of Child Labor.

Suppliers may not discriminate in hiring and in employment practices and decisions on grounds including but not limited to gender, race, color, ethnicity, indigenous or social origin or religion, sexual orientation, marital status, age, disability, political or other opinion, nationality, and union membership.

Suppliers are expected to comply with the same standards or with local laws, whichever are more stringent.

Employment-related decisions include, but are not limited to: hiring, promotion, lay-off and relocation of workers, training and skills development, health and safety, any policy related to working conditions such as working hours and remuneration.

The minimum working age is the age of completion of compulsory schooling, but never under 15 years of age. Young employees between the ages of 15 and 18 may not be exposed to work that is likely to harm their physical or mental health, safety or morals.

Suppliers must always treat their employees and workers with fairness, respect and dignity, guaranteeing equal opportunity to all. Suppliers may not use corporal punishment, disciplinary practices and any form of harassment, threat or abusive behavior in the workplace. This includes, but is not limited to: physical, sexual or psychological abuse, exploitation or coercion.

### 2. Forced labor and modern slavery

Suppliers may not use or benefit from any form of forced labor, bonded labor or labor provided involuntarily under

SES-imagotag also expects its suppliers to promote diversity and to take corrective action against any form of discrimination based on the aforementioned criteria.

## 4. Health and Safety

SES-imagotag expects its suppliers to provide a safe and healthy working environment for all their employees, contractors and other stakeholders.

Suppliers must comply with all applicable local and national laws as well as international labor law, standards and regulations on working conditions. This specifically relates to working hours, occupational health and safety and social protection systems in the event of occupational accidents and illnesses.

They must also have obtained the necessary permits, licenses and permissions from local and national authorities. Suppliers must have documented health and safety policies and/or procedures together with appropriate safety infrastructure and equipment.

Suppliers identified as being moderate to high risk on health and safety grounds (based on the hazards posed by the work or locations) must take action and provide proof of continuous improvement towards a recognized Health and Safety management system.

To minimize the risk of occupational accidents, injuries and illnesses, suppliers must:

- (i) provide appropriate equipment (including personal protective equipment) free of charge to workers;
- (ii) plan effective controls and establish safe working procedures; and
- (iii) implement effective programs and systems to ensure worker safety.

Suppliers must also provide appropriate safety information and training to workers and set up suitable systems to report, analyze, minimize and prevent risks in the event of any hazardous situations. Workers must report occupational injuries or illnesses to their supervisor without fear of consequences or reprisals.

Suppliers and their workers must be prepared for emergencies. This includes:

- worker notification and evacuation procedures;
- emergency training;
- appropriate first-aid supplies;
- appropriate fire detection and suppression equipment; and
- adequate exit facilities.

## 5. Freedom of Association and Right to Collective Bargaining and Non-Retaliation

As set out in *The International Labor Organization's Fundamental Conventions* suppliers must recognize and thereby not interfere with workers':

- freedom to join workers' organizations and associations; and
- rights to collective bargaining.

Employee representatives must not be subject to discrimination, harassment or termination of contract in retaliation for exercising employee rights, submitting grievances, participating in union activities, or reporting suspected legal violations.

## 6. Legal Contracts

All workers must have legal contracts. Suppliers must establish recognized employment relationships with their workers that comply with best practice and all applicable laws and regulations. Suppliers must not do anything to deny their workers their legal or contractual rights.

## 7. Working Hours

Suppliers must comply with all applicable national and international standards governing working hours. Furthermore, besides providing weekly rest periods, suppliers must also provide annual and national holidays as well as any parental leave, sick/medical leave or any other leave entitlements allowed under applicable laws and relevant industry standards.

## 8. Wages and Benefits

Suppliers must comply with all applicable laws and collective bargaining agreements on wages and benefits. In addition to standard wages, workers must be paid overtime at the rate specified by law or collective bargaining agreements. They must also receive any benefits to which they are legally entitled. Furthermore, suppliers must ensure that their workers receive decent, regular and adequate wages.



### III. MITIGATING SUPPLIER'S ENVIRONMENTAL IMPACT

#### 1. Environmental Management and Regulatory Compliance

SES-imagotag is committed to respecting the environment across its value chain. Suppliers are asked to support SES-imagotag in its efforts to take a precautionary approach to environmental matters.

They are also asked to apply best practice across their activities.

Suppliers must therefore comply with applicable environmental laws and regulations.

SES-imagotag also encourages its partners to promote greater environmental responsibility and to reduce their environmental impact.

#### 2. Management of Environmental Impact and Hazardous Substances

Suppliers must systematically manage and minimize their environmental impact with regard to, but not limited to:

- climate and energy;
- water;
- waste;
- chemicals;
- air pollution; and
- biodiversity.

They must set objectives and targets to reduce any such impact by means of updated production practices, facility maintenance and processes, material substitution, conservation, recycling and material reuse.

Suppliers must comply with all laws and regulations governing the use of hazardous substances. Suppliers must refrain from using substances that are banned nationally or internationally (for example substances banned because of their risk to humans or the environment). Suppliers must also have appropriate measures in place to manage, store and transport hazardous substances.



### IV. SOCIAL RESPONSIBILITY AND SUSTAINABILITY

#### 1. Conflict Minerals

The procurement of 3TG (tin, tungsten, tantalum, and gold), carries the risk of funding organizations in high-risk locations (the Democratic Republic of the Congo or adjoining countries). This includes potential threats to human rights such as child labor, harsh working conditions and corruption. SES-imagotag recognizes these risks and strives to minimize them by advocating for the responsible procurement of minerals. It encourages its suppliers to do the same.

SES-imagotag requires selected suppliers to fill out the **Conflict Minerals Reporting Template (CMRT)** or other customized conflict mineral-related document. This enables SES-imagotag to shortlist the appropriate business partners and to maintain transparency across its supply chain.

SES-imagotag's procurement team will continue to follow the guidelines established by the OECD for conflict-affected and high-risk areas. SES-imagotag requires suppliers to comply with these guidelines. SES-imagotag must also be notified of smelters/refineries so that it can maintain transparency across its supply chain. SES-imagotag will continue to participate in international efforts to ensure the responsible procurement of 3TG minerals.

#### 2. Bribery and Corruption

Suppliers must comply with all applicable anti-corruption laws and regulations including the **U.S. Foreign Corrupt Practices Act (FCPA)** and the **U.K. Bribery Act 2010**. This means a zero-tolerance policy to any form of bribery, corruption, extortion and embezzlement. No supplier or their extended supply chain may accept, authorize or offer a bribe or any other inducement (Including kickbacks, facilitation payments, excessive gifts and hospitality, grants or donations) when dealing with customers, suppliers, public officials or any other stakeholder or any person in the public or private sector.

#### 3. Preventing Conflicts of Interests

To ensure strong long-term business relationships, suppliers must avoid any behavior that might hinder trust and avoid any conflicts of interests or situations that appear to be potential conflicts of interests, including in its dealings with SES-imagotag.



## 4. Sanctions

Suppliers must comply with all applicable rules and regulations governing trade and economic sanctions, including applicable export controls. Suppliers may not procure or purchase products or parts, services to be used by or sold to SES-imagotag from a party that is subject to embargo, international sanctions or is a sanctioned party. Suppliers must carry out all necessary checks and perform appropriate due diligence to determine that any such party is not subject to sanctions.

## 5. Competition Law

When performing their contract with SES-imagotag, suppliers must comply with all applicable laws and regulations governing fair competition.

They must therefore avoid any abuse of a dominant position, cartel pricing practices, market and client allocation, collusion in tendering and, in general, any other unlawful agreement designed to prevent, hinder or distort market competition.

Suppliers are also expected to take all necessary precautions to avoid the disclosure to third parties of any commercially sensitive information regarding their supply relationship with SES-imagotag.

## 6. Data Privacy

SES-imagotag's suppliers must comply with all applicable local laws governing data protection and privacy. They must at all times respect and protect their workers' privacy and their right to their own personal data.

SES-imagotag accordingly encourages its suppliers to adopt a dedicated data protection policy. This must limit the collection of personal data to what is relevant and necessary for the activity, and requiring the lawful, fair and transparent processing of such data.

## 7. Protect Intellectual Property

Suppliers must safeguard confidential information and only use it in an appropriate manner.

They must respect the intellectual property rights of third parties, including those held by SES-imagotag. This includes copyright, patents, trade secrets, trademarks and other proprietary information.

Suppliers must ensure compliance with relevant contractual provisions and be vigilant regarding the scope of these commitments.

## 8. Collaboration Through CSR Supply Chain Audits

As part of SES-imagotag's commitment to society, its employees and the environment, SES-imagotag requires its suppliers to behave ethically while providing quality goods and services at a fair price.

To maintain transparency across the supply chain, suppliers must be audited by **EcoVadis** or an equivalent certified rating agency. The criteria for evaluation must include the Environment, Labor & Human Rights, Ethics and Sustainable Procurement.

## 9. Providing Evidence of Compliance

Suppliers must continuously monitor and report compliance with this Supplier Code of Conduct. They must also retain the necessary documentation to prove compliance with its provisions, relevant standards and with applicable laws. Suppliers must immediately notify SES-imagotag of any non-compliance and relevant planned corrective actions. Suppliers must never hide any critical areas or plead ignorance of any non-compliance.

## 10. The Audit Process

SES-imagotag reserves the right to audit, with or without prior notice, suppliers' compliance with the Supplier Code of Conduct. This may be done by SES-imagotag staff or by organizations appointed by SES-imagotag. Any such audit may include facility inspections and worker interviews or self-assessment questionnaires (e.g., on environmental and/or social practices). To this end, suppliers are expected to cooperate during such audits.

# Final Note

The information in this Supplier Code of Conduct helps address important areas and provides guidance on complex day-to-day matters. Nevertheless, this document cannot cover every scenario or eventuality. It is not, therefore, a substitute for sound judgment or sensitivity to other cultures, laws, customs and practices. SES-imagotag therefore suggests that when in doubt you consult management and professional colleagues.

Please note that this guide will be updated in light of any updates to SES-imagotag's internal policies.

# Point of Contact

Developing strong, sustainable and ethical relationships also means that SES-imagotag must make itself available to answer queries and questions from suppliers.

Please reach out to your procurement contact or email [ethics@ses-imagotag.com](mailto:ethics@ses-imagotag.com) should you have any query regarding the application of this Supplier Code of Conduct.

The same applies should you need to report any infringement. Furthermore, please consult the ***Whistleblower Policy*** for information on how SES-imagotag will support you so that you can safely express your concerns. This includes details of who to contact, how to make a report and how you are protected as a whistleblower.

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