



Supplier Code of Conduct

April 2024 – version 2.0

Let your ideas fly free



avertim
Perform. Innovate. Comply.

Summary

Introduction



- About Us
- Why this Supplier Code of Conduct?
- Our commitments

Supplier Commitments



- Commitments of our suppliers around 4 axes
- Scope of application
- Continuous improvement
- Human rights
- Labor
- Environment
- Business ethics

Adherence to the Supplier Code of Conduct



- Confirmation of commitment
- Supplier Remediation Plan

Introduction



About Us

2007
Creation



+350
Talents



4
Industries



37M€
Group Revenues 2023

“ From strategy to operations we help our clients to perform, innovate and comply ”



Avertim is a European **innovation and management consulting** group recognized as a trusted partner by top players in multiple sectors. We support our clients in managing their challenges and achieving their **complex transformation** programs. The diversity of our activities and the strong **cooperation** between our different offices have allowed us to build a corporate **culture** based on **diversity, inclusion, and mutual respect**.



AVERTIM BELGIUM
Avenue Louise 326
B - 1050 Brussels



AVERTIM NETHERLANDS
Gustav Mahlerplein 2
1082MA Amsterdam



AVERTIM GERMANY
Friedrich-Ebert-Anlage 36
60325 Frankfurt



AVERTIM FRANCE
36 Avenue Hoche
75008 Paris

Why this Supplier Code of Conduct?

a ambition **v** value **e** experience **r** respect **t** trust **i** involvement **m** mindset



Hervé Lefébure
CEO
Avertim Group

As a company specialized in management consulting, Avertim is committed to **values** inspired by **human rights, labor law, business ethics** and respect for the **environment**.

This Code of Conduct aims to clearly establish the standards and behaviors we expect from all our Suppliers. In the conduct of its activities, Avertim is committed to respecting the laws, regulations, and national and international conventions in force, in particular regarding business ethics, social rights and environmental protection.

This Code is based, among others, on the United Nations Global Compact, the United Nations Guiding Principles and the fundamental conventions of the International Labour Organization (ILO).

“ We work for recognized clients. We protect their reputation by protecting our own. It is therefore essential that our partners respect the same ethical standards to which we adhere. To this end, Avertim is committed to obtaining sustainability certifications. We also encourage our suppliers to commit to the same approach. ”

Our commitments

EcoVadis Gold Certification obtained



EcoVadis facilitates the responsible management of upstream and downstream partners by sharing and monitoring CSR performance with all stakeholders involved in the value chains.

Gold **certification** has been **obtained** by Avertim since 2023.

B Corp Certification in progress

B Corp certification is awarded to companies that meet societal, environmental and governance requirement as well as public transparency.

A **certification process** has been initiated by Avertim.



- Business Code of Conduct
- Supplier Code of Conduct & evaluation
- Anti-Bribery policy
- Ethics Committee policy
- Quality Management System
- GDPR compliance & AI&IT policies
- Culture of respect and well-being
- Training and development strategy
- Monitoring of employee satisfaction via a social barometer
- Prevention program
- Transparent recruitment process
- Sustainable Procurement policy
- Partnerships with outside entities that share our values
- Pro Bono Program
- Initiatives to reduce our environmental impact
- Encouraging sustainable mobility
- Support to associations aiming to contribute to the protection of the planet
- Environmental Policy
- Development of our sustainability offering for our clients
- Participation in positive impact projects

Supplier Commitments



Commitments of our suppliers around 4 axes

Human rights



- Respect for fundamental rights
- Fight against harassment and inhuman treatment

Labor



- Freedom of association and collective bargaining
- Prohibition of forced or compulsory labor
- Prohibition of child labor
- Equality and non-discrimination
- Wages, working hours and other working conditions
- Health and safety

Environment



- Environmental protection
- Wastewater and waste treatment
- Monitoring of atmospheric emissions
- Waste reduction, recycling increase

Business ethics



- Anti-bribery policy
- Prevention of conflicts of interest
- Gifts and invitations
- Fight against financial crime
- Fair competition
- Transparency of information and traceability
- GDPR compliance
- Establishment of a whistleblowing channel

Scope of application

In accordance with its commitments and principles of action, Avertim expects each of its suppliers, their parent companies, subsidiaries, affiliates, employees, as well as their subcontractors and any person having a business relationship with Avertim, hereinafter referred to as the "**Supplier**", to comply with the principles contained in this Code of Conduct.

Continuous improvement

The principles set forth in this Code of Conduct define the minimum standards that Avertim's Suppliers are expected to meet. Avertim expects its Suppliers to strive to exceed international and industry best practices. Avertim also expects them to encourage their own Suppliers and subcontractors to strive to comply with the principles of this Code of Conduct and to work with them in this regard. Recognizing that achieving compliance with some of the standards set forth in this Code of Conduct is a dynamic process, Avertim commits its Suppliers to continually improve workplace conditions to achieve this goal.

Respect for fundamental rights

In addition to complying with local, national and international legislation applicable to the conduct of its business, the Supplier undertakes to respect and defend the protection of human rights established at the international level and to ensure that it is not complicit in human rights violations as described in the Universal Declaration of Human Rights.

Fight against harassment and inhuman treatment

Supplier is committed to creating and maintaining an environment where all employees are treated with dignity and respect. No form of psychological, physical, sexual, verbal, intimidation, threatening or harassment will be tolerated, in accordance with the ILO's Convention No. 190 on Violence and Harassment. Supplier agrees to comply with the United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, which entered into force in 1987.

Freedom of association and collective bargaining

The Supplier undertakes to respect the freedom of association by encouraging social dialogue and the right of its workers to form, join or refuse to join an organization in accordance with the ILO's Conventions No. 87 on Freedom of Association and No. 98 on Collective Bargaining.

Prohibition of forced or compulsory labor

Supplier shall ensure that no employee is required to perform forced or compulsory labor in accordance with the ILO's Convention No. 105 on the Abolition of Forced Labor. The Supplier undertakes to comply with regulations prohibiting human trafficking, any form of slavery and forced labor. Likewise, the Supplier shall refrain from any unlawful behavior towards its employees and contractors, such as withholding identity papers or work permits, demanding any security deposit from workers, or using any other coercion.

Prohibition of child labor

The Supplier is strictly prohibited from using child labor in accordance with the ILO's Conventions No. 138 on Minimum Age and No. 182 on the Elimination of the Worst Forms of Child Labor. Furthermore, the Supplier undertakes to work exclusively with service providers who do not use child labor.



Equality and non-discrimination

The Supplier undertakes to treat all its employees equally and fairly, banning all discrimination in hiring, access to training, promotion and dismissal on the basis of nationality, social or ethnic origin, gender, religion, age, disability, sexual orientation, political opinion or any other form of discrimination in accordance with the ILO's Conventions No. 100 on equal remuneration and No. 111 on discrimination.

Wages, working hours and other working conditions

The Supplier undertakes to comply with the legal or industry minimum or with the conditions of remuneration provided for in freely negotiated collective agreements, the most protective standard taking precedence over the others. In addition to the payment of regular working hours, overtime of its employees shall be paid at the rate of increase provided by law or, in the absence of such provisions, at least at the usual rate received during normal working hours. The Supplier also agrees to discipline its employees only in strict accordance with the law. This principle shall be in accordance with the ILO's fundamental convention No. 95 on the Protection of Wages.

Health and safety

The Supplier shall provide its employees with appropriate occupational health and safety training. The information shall be clearly displayed at the Supplier's facilities. The Supplier shall provide its employees with safe working conditions without risk to the health and safety of workers in accordance with the ILO's Convention No. 155 on Occupational Safety and Health. At a minimum, the Supplier shall provide drinking water, lighting, adequate sanitation, emergency exits and protective equipment, and access to emergency medical assistance.



Environmental protection

The Supplier shall have an effective environmental policy and comply with applicable laws and regulations concerning environmental protection. Wherever possible, the Supplier shall promote the precautionary principle in dealing with environmental issues and shall undertake initiatives to encourage greater environmental responsibility. This principle should be aimed at limiting environmental risks and preserving biodiversity and its implementation should be evident at all levels of its business.

Wastewater and waste treatment

Supplier is committed to the life cycle of its products, from design to obsolescence, and to the process of repair, reuse and/or recycling. Supplier is committed, whenever possible, to integrating the full life cycle of its products, making quality goods that stay in circulation longer and using recycled materials. Wastewater discharge and solid waste disposal shall be monitored, controlled and treated appropriately.

Monitoring of atmospheric emissions

The Supplier undertakes to analyze, monitor, control and properly treat its emissions into the atmosphere (sulfur oxide, nitrogen oxide, carbon monoxide, carbon dioxide, ozone, methane, etc.).

Waste reduction, recycling increase

The Supplier undertakes to limit new resource extraction, to reuse resources already produced, to keep them in circulation as long as possible and to reduce its consumption of natural resources (fossil fuels, raw materials, plastics, forest products, etc.) to reduce pollution related to its operations.

Anti-bribery policy

Supplier shall adhere to the highest moral and ethical standards, comply with national laws, and shall not engage in any form of corruption, including, but not limited to, extortion, fraud or bribery. Supplier shall not, under any circumstances, directly or through intermediaries, offer or promise any personal benefit in order to obtain or retain business or any other advantage.

Prevention of conflicts of interest

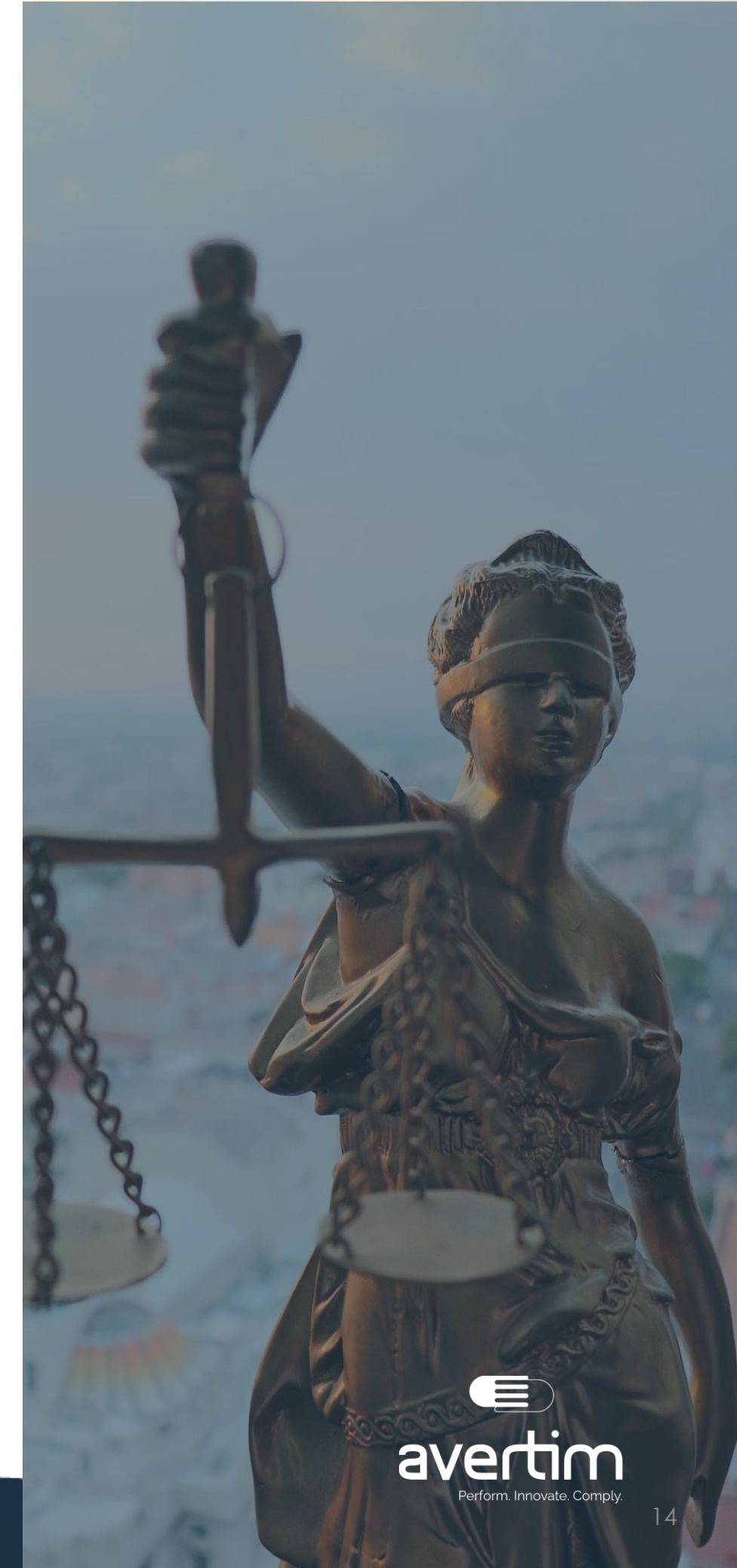
Supplier shall avoid any conflict of interest or any situation that may give the appearance of a conflict of interest either with respect to an employee of Supplier or Avertim, or with respect to another client in competition with Avertim. The Supplier shall endeavour to prevent the occurrence of situations creating a conflict of interest in the context of its collaboration with Avertim. Supplier shall take care not to impair the judgment and exercise of professional responsibilities of Avertim's employees by avoiding conflicts of interest and inappropriate external influence.

Gifts and invitations

If the Supplier wishes to offer gifts, invitations or free services to Avertim's employees, these must be of low value and offered in a transparent and appropriate manner. Under no circumstances shall these gifts and invitations create a conflict of interest or a loss of objectivity for the recipient.

Fight against financial crime

The Supplier undertakes to take all necessary measures to combat any form of money laundering, tax evasion or other illegal financial mechanisms.



Fair competition

The Supplier undertakes to comply with the laws and regulations in force concerning free and fair competition, excluding any abusive or illegal behavior and anti-competitive or unfair practices: unfair competition, abuse of a dominant position, cartels, abusive exploitation of the situation of economic dependence in which a customer or supplier finds himself.

Transparency of information and traceability

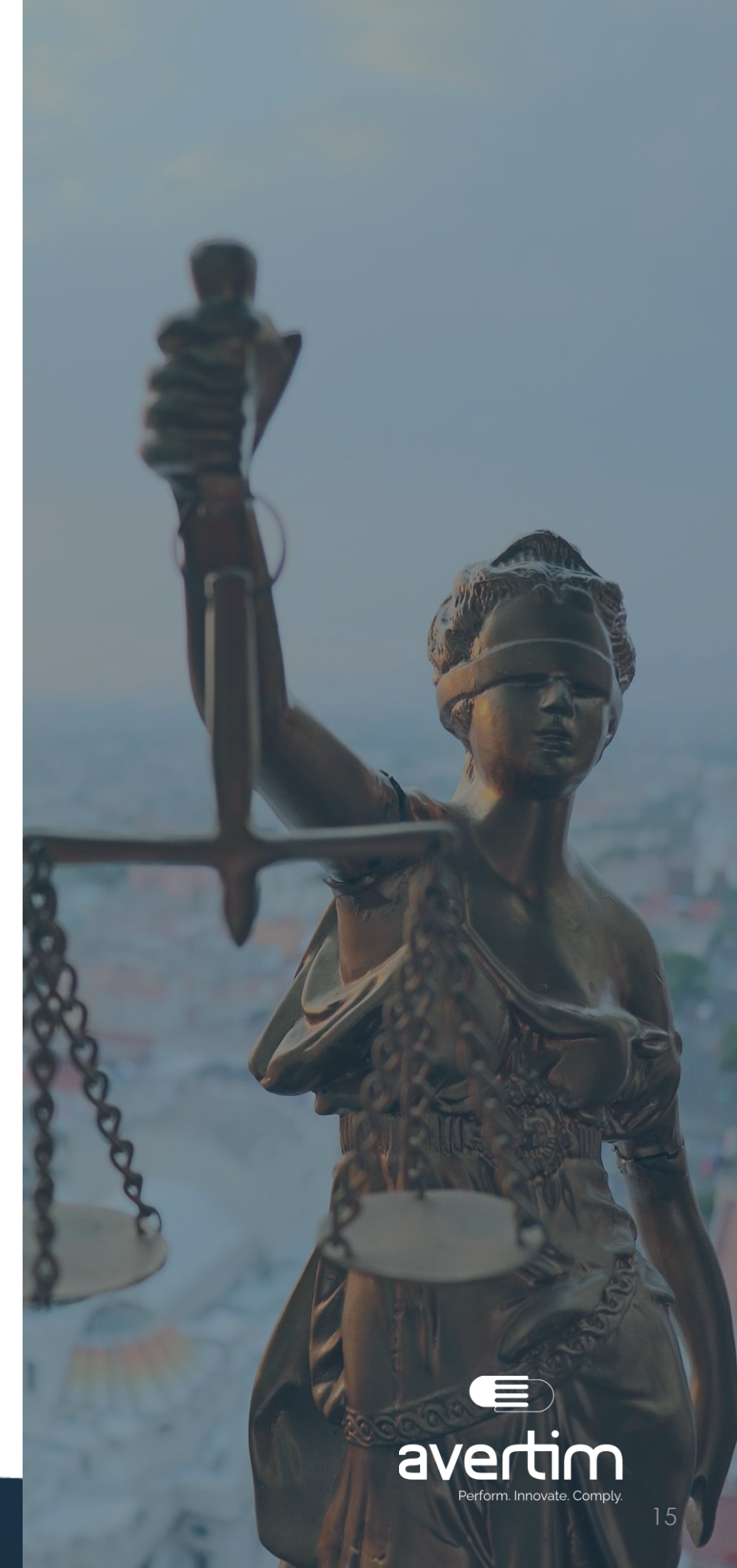
The Supplier undertakes to allow Avertim and/or a third party authorised by Avertim to carry out audits of their operations in relation to this Code of Conduct as part of its review and documentation policy. To facilitate these checks, the Supplier undertakes to be able to provide complete and precise information on the origins and characteristics of the raw materials, resources and products used, as well as on the working conditions of its employees and subcontractors.

GDPR compliance

The Supplier undertakes to respect the confidentiality of non-public information and data shared. In particular, it undertakes to adequately protect all strategic, financial, technical or commercial data or documents in its possession, as well as personal data in accordance with the requirements of the GDPR.

Establishment of a whistleblowing channel

Supplier agrees to establish a whistleblowing channel for its employees to report any behavior that violates discrimination and harassment laws or any other ethical concerns. This channel must also allow the employee to raise any questions, concerns, ethical or compliance issues without incurring penalties. Reports of illegal or unethical behavior by any Avertim employee may be made, in good faith, to Avertim's Ethics Committee at the following address: ethics.committee@avertim.com.



Adherence to the Supplier Code of Conduct



Confirmation of commitment

We, duly represented by our legal representative, hereby confirm that :

- We have received and taken due note of the content of the Supplier Code of Conduct established by Avertim as well as the assessment tool provided, which we undertake to complete and return by email to Avertim with all supporting documents.
- We comply with the requirements of this Code as well as the annex clause of good business conduct, which is an integral part of the service provision contract with Avertim.
- We will inform our employees and subcontractors who have a direct relationship with Avertim of the contents of this Code of Conduct and ensure that they also comply with the principles contained herein.
- If our actions are not aligned with this Code, we undertake to identify and initiate corrective action within a reasonable time.
- We authorize Avertim or any organization acting on its behalf to conduct audits to verify compliance with the principles set forth in this Code of Conduct. These audits may take place at any time, with or without notice. As a result of such audits, we undertake to implement, within a reasonable period of time, the main points of improvement and corrective measures set out by Avertim in its "Supplier Remediation Plan". We undertake to keep Avertim regularly informed of progress and residual deviations.
- We will report to Avertim or the relevant authorities any suspected violation of this Code of Conduct, rules and laws by any of our employees or subcontractors. In the event of a suspected violation of this Code of Conduct, rules and laws by an Avertim employee, we undertake to notify its Ethics Committee at the following address: ethics.committee@avertim.com.
- We are aware of all laws and regulations in force in the countries where our company operates.

In the event of a serious breach of the Code of Conduct, a refusal to provide the required information or a repeated and unjustified unwillingness to implement corrective measures to comply with this Code of Conduct, Avertim reserves the right not to renew the contract with the Supplier.

Any questions regarding this Code of Conduct can be sent by e-mail to the following address: ethics.committee@avertim.com.

Company name

Company address

Name, first name and function of the legal representative

Signature of legal representative

Code Revision

The Ethics Committee of Avertim commits to reviewing and updating its policies and procedures at least annually. The next update will take place in Q1 2025. Constantly adapting to an evolving society, Avertim Group commits to modifying this charter when necessary.

If the Code were to be revised, modified, or amended by Avertim's Ethics Committee, along with various entities composing Avertim Group, the final updated version would systematically be displayed to our stakeholders.

Adherence to the Business Conduct Code

We, the Ethics Committee of Avertim, expect our Suppliers to comply with this Supplier Code of Conduct.

The first publication of this Code of Conduct was validated on 19/12/2022 by Avertim's Ethics Committee.

Versions	Adopted by	Date
1.0	Avertim Ethics Committee	19/12/2022
2.0	Avertim Ethics Committee	11/04/2024

On the behalf of Avertim Ethics Committee,
Hervé Lefébure – Chief Executive Officer



Axes	Current Impairment	Remediation plan	Deadline	Status
Human rights	<ol style="list-style-type: none"> 1. ... 2. ... 3. ... 	<ol style="list-style-type: none"> 1. ... 2. ... 3. ... 	<ol style="list-style-type: none"> 1. ... 2. ... 3. ... 	<ol style="list-style-type: none"> 1. ... 2. ... 3. ...
Labor	<ol style="list-style-type: none"> 1. ... 2. ... 3. ... 	<ol style="list-style-type: none"> 1. ... 2. ... 3. ... 	<ol style="list-style-type: none"> 1. ... 2. ... 3. ... 	<ol style="list-style-type: none"> 1. ... 2. ... 3. ...
Environment	<ol style="list-style-type: none"> 1. ... 2. ... 3. ... 	<ol style="list-style-type: none"> 1. ... 2. ... 3. ... 	<ol style="list-style-type: none"> 1. ... 2. ... 3. ... 	<ol style="list-style-type: none"> 1. ... 2. ... 3. ...
Business ethics	<ol style="list-style-type: none"> 1. ... 2. ... 3. ... 	<ol style="list-style-type: none"> 1. ... 2. ... 3. ... 	<ol style="list-style-type: none"> 1. ... 2. ... 3. ... 	<ol style="list-style-type: none"> 1. ... 2. ... 3. ...