



# Ethic & Compliance

## Supplier code of ethic

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# Our commitment

Just like the environment, ethics are a key pillar of our growth strategy. That is why we must clearly express our commitments as a socially-responsible company. Our ethical principles – integrity, respect, confidentiality, transparency – will ensure the continuing confidence of our customers and stakeholders. The Scalian Group has a policy of "zero tolerance" as regards corruption and influence peddling, in whatever form, throughout the Group and all its business activities.

Scalian expects its suppliers, subcontractors and consultants (collectively referred to as "suppliers") to respect its values and standards of ethical conduct. Working together with integrity and transparency is essential for Scalian's business activities and the quality of its services and products.



This Supplier Code of Ethics summarises the principles that apply to Scalian's suppliers, whether they work with Scalian or on the Group's behalf.

If you have any questions or if you witness any inappropriate behaviour, we would encourage you to use the Incident-reporting Procedure in order to inform our Ethics & Compliance correspondent. As Chairman, I shall ensure no whistle-blower is subject to any form of reprisal for reporting an incident.

Our Code of Ethics can only exist through the active involvement of everyone. Scalian's credibility depends on this, as does yours.

# Your principles

As a supplier, you must conduct your business in compliance with the laws and regulations in force, notably including, but not limited to, those relating to:

## Conflicts of interest

A conflict of interest refers to a proven or apparent situation in which an individual or organisation has several interests due to their position or responsibilities in a public institution, a company, an association, a foundation, etc. These different interests can be in conflict with each other and affect decisions or actions.

A conflict of interest arises when a person must fulfil a mission or role of general interest but their personal interests are in competition with that mission.

## Corruption & influence peddling

Making or proposing offers, promises, gifts or benefits of any kind to a French or foreign public or private intermediary in order to obtain, facilitate or obstruct the performance of an act related to the person's position, job or mandate for one's personal benefit or the benefit of a third party.

## Fraud

Fraud refers to an intentional act committed by a member or members of the management or board of governance, employees or third parties, involving the use of deception in order to obtain an unfair or illegal advantage.

## Anti-competitive practices

An anti-competitive practice is when a company, group of companies or trader distorts, obstructs or destroys competition between companies or traders in the market.

## Cybercrime

There are various forms of cybercrime: malware or spyware (that enables a hacker to track all operations carried out on the contaminated computer) or phishing.

## Unethical behaviour

Owning worksites or using suppliers in foreign countries in which the working conditions and safety standards are not complied with, or even condemned by NGOs.

## **Bypassing an embargo**

Deciding to circumvent an embargo and to carry out transactions with countries or entities that are subject to sanctions.

## **Embezzling assets**

This fraudulent practice involves embezzling the assets of a company for the benefit of a third party, without any compensation for the company embezzled, in this case Scalian.

## **Falsifying Information**

An example would be high-ranking employees deciding to put in place schemes to hide the real facts to Scalian.

## **Counterfeit**

Counterfeiting is defined as the total or partial reproduction, imitation, or use of an intellectual property right without the authorisation of its author. This can be a trademark, a design, a patent, copyright, software, an integrated circuit, or a plant variety. Infringements of neighbouring rights, protected designations of origin and geographical indications are also considered to be infringements.

# Combating corruption

Scalian is a signatory of the **United Nations Global Compact** and therefore asks its suppliers to take action against every form of corruption, including extortion and bribery in accordance with **Principle 10 concerning the fight against corruption**.

Suppliers shall conduct their activities in accordance with the laws and regulations in force:

## Conflicts of interest

Suppliers must be free to act objectively in their business relations and must therefore avoid any conflict of interest linked to the work carried out for Scalian. Suppliers shall report any real, potential or apparent conflict of interest to Scalian's designated contact person before entering into negotiations or business relationships with Scalian or on behalf of Scalian.

- ✗ Make a facilitation payment in any form to a public official, agent or intermediary in order to facilitate or speed up a routine procedure.

## Gifts & Invitations

Precautions must be taken when offering or accepting a gift, invitation or form of hospitality, even on an occasional basis. This practice must not be used (or appear to be used) to obtain an unfair advantage or preferential treatment. As such, suppliers shall comply with the following principles:

## Bribes and corruption

Under no circumstances may a supplier to the Scalian Group, whether for their own benefit, or that of a third party, or a third party for the benefit of the supplier:

- ✗ Give, promise to give or offer a payment, cash donation, commission, gift, trip, invitation or any other form of gratuity, with a view to obtaining an unfair advantage or in return for having obtained an unfair advantage,
- ✗ Accept or solicit a payment, cash donation, commission, gift, trip, invitation or any other form of gratuity from a third party who is known or believed to be expecting an unfair advantage in return,

- ✗ Gifts and invitations must comply with applicable laws and regulations;
- ✗ Gifts and invitations must not be offered or accepted in exchange for any privilege or in order to unduly influence a business relationship;
- ✗ Gifts and invitations must: (i) be of a justifiable value, (ii) be suited to the occasion, and (iii) be appropriate in nature and value relative to the donor's and recipient's positions;
- ✗ Gifts and invitations must be given or accepted in an honest and transparent manner and it must be possible to carry out a verification if necessary;

- ✖ The frequency and timing with which gifts and invitations are given or accepted by the same people or organisations must not give rise to a potential conflict of interest or improper conduct;
- ✖ The gifts and invitations offered must be fully and accurately documented in the supplier's accounts and records.

## Facilitation payments

Suppliers shall not make any facilitation payments on behalf of Scalian or for the possible benefit of Scalian, whether the Supplier works directly or indirectly with Scalian, even in countries where this may be a legal practice.

## Accounting practices

Suppliers shall ensure their accounts and records are accurate, complete and reliable, and prepared and conserved in accordance with applicable laws and regulations.

## Bypassing an embargo

Suppliers' activities must fully comply with applicable laws and regulations concerning trade sanctions, export controls, customs formalities and anti-boycott measures.

Suppliers shall also ensure their contracts include no clauses that result in the illegal boycott of trade with a certain country.

## Anti-competitive practices

Suppliers shall adopt fair competition practices and comply with the antitrust and competition laws in the areas in which we do business.

## Counterfeit

The supplier shall adopt practices to identify any counterfeit and to inform and collaborate with Scalian and the legal authorities in the event of proven counterfeit.

## Reporting

Suppliers shall immediately send a report to Scalian if they suspect that a Scalian employee or any person involved in the activities carried out by or for Scalian has failed to comply with our Code of Ethics, our Supplier Code of Ethics or the laws, rules and regulations in force.

The report must be made through one of the following channels:

- ✖ By using the secure website <https://scalian.integrityline.app/>
- ✖ By contacting our Ethics & Compliance Director at [ethic.compliance@scalian.com](mailto:ethic.compliance@scalian.com)