

Responsible Procurement Policy



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Following the creation and deployment of a number of fundamentals, ATALIAN's Group Procurement entered a new phase in its development, the main inputs of which are:

- Significant economic growth in line with the ethics rules laid out in the Responsible Procurement Policy
- The widespread use, by our global buyers network, of our «Procurement process and Procedures» framework; a mandatory tool to increase the performance of our Procurement unit
- Agile and professional buyers, acting as partners of ATALIAN teams and other transverse entities within the Group
- A formal annual commitment, through our Improvement contract, to implement credible action plans
- The implementation of a “Purchasing” software to increase maturity and performance:
 - Increase global and detailed visibility of Group Procurement spending
 - Steer Purchasing action plans and monitor economic savings
 - Centralize Supplier contracts
 - Promote a 360° Vision of Supplier Performance
- An active and direct contribution to the Group's sales performance, by being involved in significant calls for tender

We can address the development of ATALIAN's Procurement unit, according to the following title:

“A consistent acceleration of performance”

Pascal GARNERO

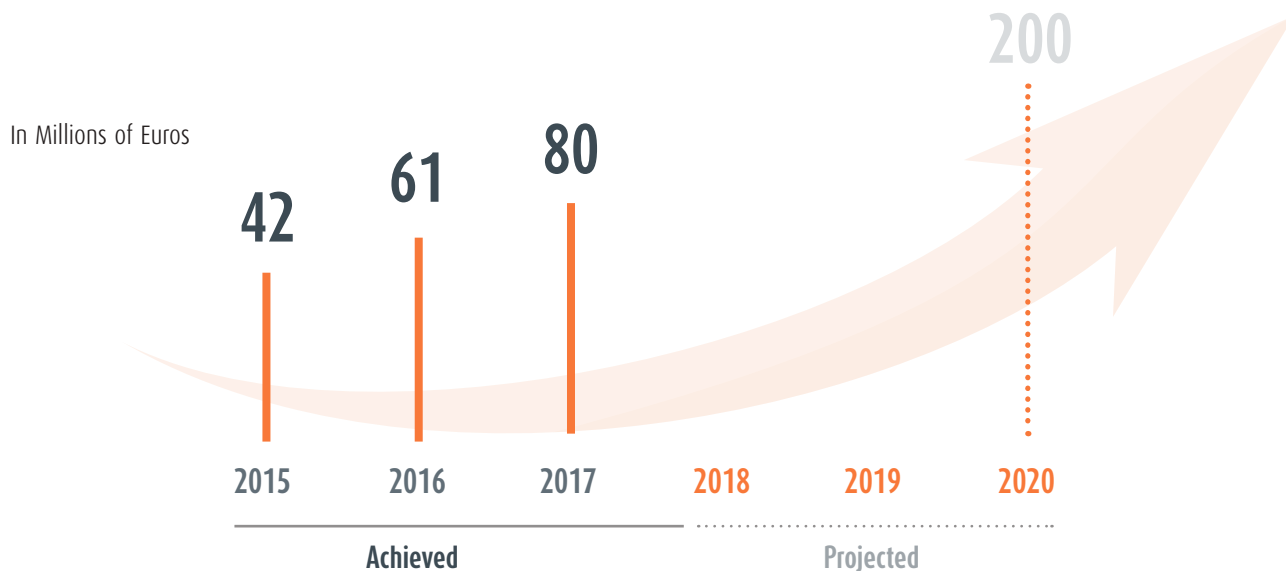
Group Chief Procurement Officer

Progression of ATALIAN's procurement performance according to EcoVadis:



	2013	2014	2015	2016
Resp. Procurement Indicators	40	40	50	60
Global ATALIAN scope Total Score:	43	55	56	62

French and international suppliers that have signed the Responsible Procurement Charter



OUR RESULTS

Percentage (%) of buyers, from our Purchasing network (Central /Local Responsible Procurement buyers), who have signed the Procurement Code of conduct. Objective: 100%

SCOPE	2017	2020
FRANCE	100%	100%
WORLD	80%	100%



The major Orientations of the General Company Policy set-out by the Presidency for the Group:

- Continue to be a leader in our sector, thanks to uninterrupted growth, in order to increasingly earn the trust of our clients
- Leverage the assets linked to our global presence and continue our political expansion through acquisitions; adapt our processes to our geographical coverage; increase our initiatives in terms of innovation, as a pillar of differentiation; share our “Best practices” and create synergies between our countries; finally, practice cost rationalization.
- Take action together by increasing the professional skills of our teams, through experimental management and fostering unwavering corporate team spirit, which promote transverse operations.
- Increase our profitability to guarantee the development of the Group, alongside solid financial indicators that reassure our investors for future acquisitions

Thanks to a clearly defined General Company Policy we can define a relevant Procurement policy!



Which General Procurement Policy for which General Company Policy?

Our «**ATALIAN Procurement Excellence 2020**» project must be cost-efficient, federating, empowering and operational, in order to continue to support the implementation of the General Company Policy.

Major orientations of the project:

- Accelerate and increase our Contribution to the financial performance of the Group, by covering larger procurement spending
- Finalize the structure of our Purchasing network at an international level:
 - by increasing the skills of our local Responsible Procurement Buyers (countries, areas)
 - by applying, and adapting if necessary, the Procedures framework linked to our activity
 - by capitalizing on the consolidation and mutualisation of the Procurement volumes on a global basis
 - by creating synergies through the structured coordination of our Procurement activity
- Quickly deploy, across ATALIAN's geographical scope, the Procurement software "BRAVO ADVANTAGE", in order to:
 - ease and accelerate control of our Group Procurement spending and increase cost-effectiveness
 - harmonize our Procurement practices
 - enable the serene implementation of our "Responsible Procurement Policy"
- Pursue our collaboration, in partnership with the sales teams, with our clients, by contributing to the improvement of our offer and bringing innovative solutions, derived from an intense collaboration with our current suppliers, to the table, as well as setting-up continuous technological monitoring.

The quality of our teams and the credit granted by our internal clients and suppliers, are strong factors which comfort us in the knowledge that we will succeed in carrying-out this ambitious project together.

Performance Indicators that will be implemented to go forward:

1. Number of «Procurement Code of conduct» signatures gathered from employees directly involved in the Procurement process
2. % in value of the use of ecological products
3. Number of suppliers having signed the "Sustainable Procurement" Charter



Pursuing our CSR commitments

Through our formal commitments: members of the Global Compact, Sustainable Development Charter, Code of Ethics, our numerous «ISO & QHSAS» certifications, ATALIAN Group has invested heavily in its CSR approach.

The Group's Procurement unit also support these commitments when it decided to publish its "Responsible Procurement policy", and thereby create a reference document for the entire Group. The evaluation performed by EcoVadis, also proves this ambitions; within three years, from 2013 to 2016, our Procurement grade went from 40 to 60 points, pointing to a strong progression and enabling the Group to consolidate its Premium position.

Simplification, harmonization and creating synergies, have become mandatory to the economic stakes relating to our external expenditure.

The signing of the "Responsible Supplier relations Charter" on 9th of May 2017 in France, further proves our willingness to steer towards concrete achievements.

In this context and on this basis, we are committed to:

- Continue to improve our management system
- Make available and engage the necessary resources to reach the objectives we have defined
- Keep to our "Procurement" promise in terms of the 10 ATALIAN commitments that appear in the "Responsible Supplier relations Charter"
- Maintain a system that listens to our internal and external clients, in order to continuously improve the quality of service provision

Team spirit, solidarity, unwavering motivation and collective intelligence, will guarantee that we set-up the right methodology and uphold values that help us reach our objectives.

Pascal GARNERO

Group Chief Procurement Officer





APPENDICES

Addressed to ATALIAN service providers/suppliers

Through the various commitments taken by the Group in terms of sustainable development and its membership of the United Nations Global Compact in 2012, ATALIAN has been supporting and promoting the principles of the Global Compact in its sphere of influence, by incorporating them into its daily operations alongside its partners.

This document, which formalizes ATALIAN's commitment in the areas of Ethics and Sustainable Development, leads the Group Procurement Department to remind its providers/suppliers of goods and services, of the necessity to defend and respect certain principles when contracting with ATALIAN Group.

Upon entering into a contract with ATALIAN Group entities, the Supplier must commit to respecting the following principles:

Ethics:

There are several phases to the life of a contract: the start-up meeting, the opening meeting, the contract review, risk management and the contract renewal.

■ RESPECT THE PRINCIPLES UPHELD BY THE INTERNATIONAL LABOUR ORGANISATION

The Provider is committed to respecting the principles upheld by the Conventions of the International Labour Organisation and, in particular, the abolition of child labour and the elimination of any form of forced or compulsory labour.

■ TO NOT RESORT TO UNDECLARED WORK AND RESPECT EXISTING EMPLOYMENT LEGISLATION

The Provider must not resort to undeclared workforce. In particular, the supplier undertakes to fulfill all his/her obligations pertaining to declarations to administrative, social and fiscal authorities as laid out by their country's laws.

■ COMMIT TO FIGHTING CORRUPTION

The Provider declares that he/she shall not offer or pay any bribes to his/her clients. He/she also declares that he/she shall not authorize any member of staff to solicit or accept a bribe, for his/her personal benefit or the benefit of his/her family, friends, associates or acquaintances.

Social Practices:

■ RESPECT FOR SOCIAL REGULATIONS AS WELL AS ALL REGULATION SPECIFIC TO ONE'S ACTIVITY

The Provider is namely committed:

- to not practice any form of discrimination in terms of employment policy and staff management and to promote equal professional treatment,
- to avoid resorting to any type of mental or physical coercion, or corporal punishment for disciplinary purposes,
- to respect the legislation in force in terms of the management of work-hours, remuneration, training, union rights, hygiene and security.

■ **SET UP A RISK PREVENTION APPROACH FOCUSED ON SECURITY IN THE WORKPLACE; A MAJOR PREOCCUPATION IN THE EXERCISE OF ONE'S ACTIVITY**

■ **SET UP A QUALITY APPROACH AND PROMOTE PROFESSIONAL TRAINING FOR STAFF**

Environmental practices:

■ **ADHERE TO THE PRINCIPLES OF ENVIRONMENTAL PROTECTION**

The prescriber declares that he/she adheres and respects the fundamental principles of environmental protection through the implementation of an environmental policy that mirrors the best practices of his/her profession.

■ **RESPECT FOR ENVIRONMENTAL REGULATIONS IN FORCE**

The prescriber is committed to scrupulously respect local, national and international regulations, such as any environmental protection practices within the framework of one's activity, on behalf of the entities of ATALIAN Group.

■ **COMMIT TO MONITOR THE IMPACTS OF HIS/HER ACTIVITY ON THE ENVIRONMENT AND SUBSCRIBE TO CONTINUOUS IMPROVEMENT**

The prescriber must subscribe to monitoring the impacts of his/her activity, goods and services, on the environment, by setting-up a process to identify the consequences of his/her activity on the environment. He/she is committed to implementing a continuous improvement process to manage and monitor the environmental impacts of his/her activity.

■ **PROMOTE THE PRINCIPLES OF THIS CHARTER TO HIS/HER OWN PARTNERS AND SUBCONTRACTORS**

The prescriber is committed to promote the above mentioned principles to his/her own suppliers, providers and or sub-contractors. He/she is also committed to ensure that his/her own suppliers, providers and sub-contractors respect all the principles upheld in the present Charter.

■ **ACCEPT THE POSSIBILITY THAT THE GROUP'S ENTITIES CAN CONDUCT AUDITS IN ORDER TO VERIFY THE IMPLEMENTATION OF THE PRINCIPLES WITHIN THE CHARTER**

Agreement and Signature:

I, the undersigned, accept, in the name of and on behalf of (Name of company), ATALIAN Group's Sustainable Procurement Charter and commit our company to respect the principles of the United Nations Global Compact.

Name of company:

Date:

Name of person signing:

Role:

Signature and company stamp:

Addressed to ATALIAN Group collaborators

As part of his/her daily missions, the Buyer or Procurement correspondent represents the Group externally and is often, partially or completely regarded as a decision-maker, in relation to certain financial decisions he/she makes.

Through his role, he/she is subjected to assessments of value and behavior and must be informed of existing ethics rules.



The principles enumerated below must be accepted and scrupulously respected by all Procurement units as well as the main prescribers at all hierarchical levels. These principles fix the rules inside the Code of conduct for any Group employee that is in direct contact with suppliers or sub-contractors, and inform all concerned actors of the boundaries they must not cross. These principles are upheld inside the Code of conduct.



Within the context of their professional relations with suppliers and sub-contractors, and their responsibilities, members of staff must ensure they act according to the interests of the Group and according to the law.



No Group employee can invest directly or indirectly in the capital or debt of a supplier or subcontractor, in the main company or its subsidiaries, where relations exist between the Group and its suppliers or subcontractors.



The selection of a supplier or subcontractor of goods and services for the Group must be carried out according to exclusively objective and transparent criteria. Any favoritism founded on family or friendly relations, race or religion is a grave fault.



According to the Group's code of conduct, the Procurement unit must ensure that the fundamental social, ethical and environmental principles, be concretely respected by the subcontracting company with which the Group sustains relations across the world. The relevant clauses must be incorporated into the contract.

PROCUREMENT CODE OF CONDUCT



It is forbidden to receive gifts of any nature from suppliers or subcontractors, be it money, material goods, services, entertainment, travel. There can be no exception, except for the following specific cases:

- For promotional objects, low value end of year gifts, professional luncheons or dinners at reasonable frequency
- Accepting this sort of gift must in no way alter the decision-making capacity of the buyer or the prescriber in relation to his/her supplier
- The employee that accepts the gift must have it sent to his/her professional address. He/she must not communicate his/her personal address to suppliers..



The confidentiality of any information received as part of a consultation and in relation to a supplier, must be strictly respected, specifically in relation to other competitors.



I, the undersigned, **adhere** to the principles of **ATALIAN's** Procurement Code of Conduct and I am committed to respect them as part of my role.

Made in Vitry-sur-Seine, on / /

Name/Department:

Signature:

I, the undersigned, **do not adhere** to the principles of **ATALIAN's** Procurement Code of Conduct and I therefore do not wish to sign it.

Made in Vitry-sur-Seine, on / /

Name/Department:

Signature:

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