



greenyellow
SHIFT TO PROFITABLE ENERGY!

A photograph of two workers in hard hats walking across a vast array of solar panels on a rooftop. The panels are arranged in long, parallel rows that recede into the distance under a clear sky.

Responsible Procurement Code
2024 edition



At GreenYellow, we are deeply committed to serve the energy transition and have a positive impact around us. Through our activities, we contribute directly to fighting against global warming. Being a signatory of the United Nations Global Compact, we adhere to the highest standards in the conduct of our activities, and in particular to respect for human rights, social rights and environmental protection.

With this Responsible Procurement Code, GreenYellow wishes to go one step further in its CSR commitments and deploy a responsible procurement practice, all around the world and for all its activities.

My goal is that through the adherence of all our suppliers to this Code, we will engage our direct - and indirect - eco-system to commit to the best CSR practices. Our teams have undertaken this ambitious task with determination and energy, and I am convinced that we will lead the energy transition in a more responsible way.

Philippe HOUINS, COO and co-founder



Universal Declaration of Human Rights

Paris Agreement/Kyoto Protocol

ILO Declaration on
Fundamentals Principles and Rights at Work

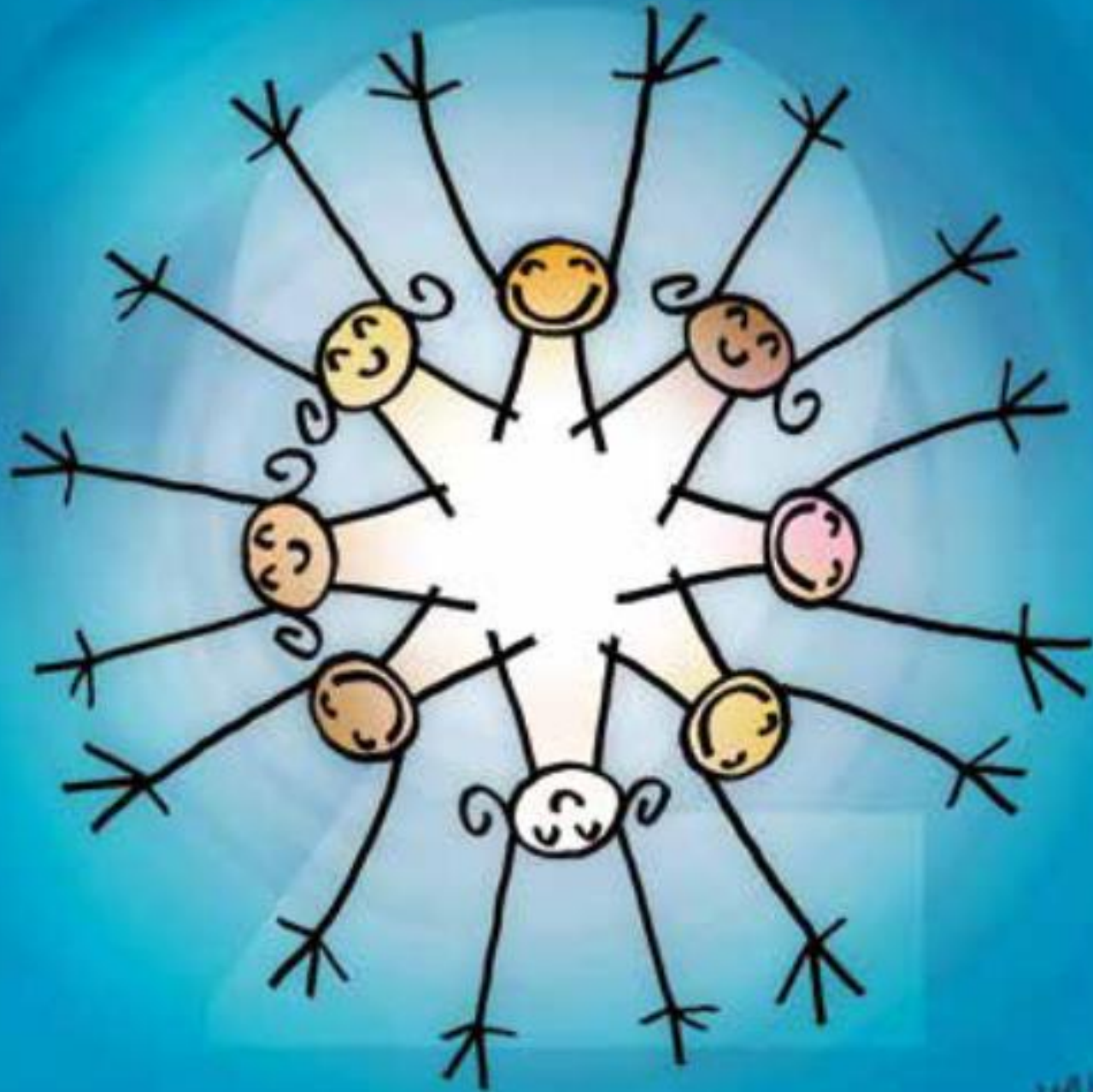
In line with its commitments and principles of action, GreenYellow, expects each of its suppliers their parent companies, subsidiaries and affiliates, employees, whether temporary or permanent, as well as subcontractors and suppliers of suppliers, any suppliers, and any person having a business relationship with GreenYellow, hereinafter referred to as "Suppliers", to comply with the principles set forth in this "**Responsible Procurement Code**".

GreenYellow expects its Suppliers to ensure full compliance with national and international laws and regulations and applicable international treaties especially regarding :

- 1 Promotion of and respect for internationally recognised human rights
- 2 Respect for health and safety at work
- 3 Respect of environmental standards and climate change mitigators
- 4 Respect for ethics, compliance and transparency
- 5 Fair business practice

Locally, only legal standards consistent with the general principles of the international conventions referred to in this document are acceptable.

This Charter may not in any event be used to prevent the implementation of more favourable requirements than those specified in international standards and/or national and/or local law.



1

Promotion of and respect for internationally recognised human rights

GreenYellow abides by French law on multinational companies' duty of care and expects its suppliers to promote and respect human rights within their area of influence regarding the International Labour Organization (ILO).

Child labour: The supplier must ensure that no illegal child labour is used in the completion of their work. The term "child" here refers to any person under the legal employment age in the country where the work is performed, on the additional condition that this legal age complies with the provisions established by the ILO.

Forced or compulsory labour: The suppliers commits to forbid forced or compulsory labour as defined by ILO.

Illegal work: The supplier undertakes not to use concealed work and to fulfil the obligations relating to declaration and payment to the administrative, social and tax authorities as provided for in the countries concerned.



2

Respect health, safety and equal opportunities at work

GreenYellow encourages its suppliers to deploy a health and safety policy guaranteeing a safe and healthy working environment for its employees and to maintain an environment in which the dignity of people is respected.

Safety: Suppliers must prepare their teams to identify, assess and manage safety risks and must ensure that incidents and accidents are reported promptly, and corrective/preventive actions taken immediately.

Hours worked: Suppliers should align with the working hours acceptable determined by the regulations of the countries in which they operate.

Remuneration: Suppliers must comply with local legislation on minimum wages and undertake to pay their salaries to employees on a regular basis. Suppliers undertake to pay overtime hours in accordance with the rates defined by the applicable legislation.

Discrimination: Suppliers undertake not to make a distinction between people according to their age (s), sex, religion, political opinion, social or ethnic origin, sexual orientation or identity, disability, family situation, nationality, patronymic or physical appearance. They must promote equal treatment and equal opportunities in accordance with the ILO principle of non-discrimination.

Freedom of association and the right to collective bargaining: Suppliers guarantee their staff the rights to unionize and to communicate freely with their management on their working conditions without fear of harassment, attempted intimidation, sanctions, pressure or retaliation. They also recognize and respect the workers' right to freedom of association, whether or not joining an association of their choice.

Harassment and abusive conduct: Suppliers treat their employees with respect and dignity and prohibit any form of corporal punishment, physical, sexual, verbal or psychological harassment, or any other form of abusive conduct.

Respect environmental standards and deploy climate change mitigators

GreenYellow expects its suppliers to align with the expectations of the Paris Agreement/Kyoto Protocol to fight against global warming and to comply with all applicable environmental laws and regulations.

Environmental management system: Suppliers will establish a system (such as ISO 14001) to identify and control the environmental impact of their activities, products or services, continuously improving their environmental performance, and implement a systematic approach to setting environmental objectives, achieving them and demonstrating that they have been achieved (making the necessary improvements relating to environmental protection, limiting the environmental impact of industrial activities).

Recycling / waste management: Suppliers will ensure that all types of waste are monitored and reduced or eliminated at source through practices such as production modification, improved maintenance techniques and equipment, replacement of materials with more efficient ones, substitution of materials with others, conservation, recycling and reuse of materials.

Biodiversity: Suppliers commit to preserving natural resources and biodiversity, and to structuring their activities and supply chain in such a way as to avoid or minimise negative environmental impacts (greenhouse gas and pollutant emissions, waste etc.) while striving to continuously improve their products, processes and services to make them more environmentally friendly

Carbon footprint/ecological footprint : Suppliers are expected to limit their carbon impact by creating and/or adopting eco-friendly products and methods; in particular they are expected to :

- make every effort in their process, including innovation, to develop products with the lowest possible environmental impact throughout their life cycle, from raw materials to recycling, including renewable energy use and programmed obsolescence reduction/avoidance;
- commit to reducing their environmental impact by selecting low-carbon means of transportation and/or by selecting local suppliers.



4

Contribute to upstream supply chain performance and transparency

GreenYellow expects its suppliers to disclose traceability information and engage their own suppliers in a more responsible approach (aligned with ISO 20 400 principles) throughout their upstream supply chain.

Prohibited substances and materials : Suppliers should purchase products or parts in respect of the legislation or regulations applicable in the country of manufacture but also in the zones/countries where these supplies are marketed or used (European Union, etc.), products or parts in conditions of prohibition, restriction of use or traceability of substances of concern for the protection of health or the environment.

Traceability and transparency: Suppliers commit to transparency and accountability in their line of business, in particular :

- to combat the use of minerals from conflict zones : GreenYellow policy is to establish with suppliers' transparency on the origin of the minerals used, in particular those from conflict zones (including tungsten, tantalum, tin and gold). These control measures must be made available to GreenYellow upon request.
- Export : Suppliers shall be able to disclose any restrictions that may be imposed on the export or re-export of their supply of goods or services.

Relationship of the Supplier with its own suppliers: Suppliers must support the deployment of the above principles throughout their own supply chain. Suppliers therefore undertake to make their own suppliers aware of the issues of responsible purchasing and implement all necessary due diligence with regard to their own subcontracting chain.

GreenYellow expects its suppliers to comply with its Ethics Charter to ensure fair business practices while complying with data protection laws.

Fight against conflicts of interest: Suppliers and their employees are expected to avoid any situation that involves a conflict between their personal interests and the interests of their company.¹

Anti-corruption²: Suppliers agree to abide by GreenYellow's principles and to ensure that their suppliers and subcontractors also abide by them. They agree to implement a compliance program to detect and prevent corruption, including internal rules that prohibit and sanction corruption, an employee awareness campaign, third-party evaluations and appropriate control systems.

Compliance with Competition Law: Suppliers are expected to comply strictly with the fair trade and competition laws applicable in the countries in which they operate. Generally, these laws prohibit agreements or practices that restrict or distort competition or trade.³

Compliance with international trade rules :Suppliers must comply with applicable international trade regulations, including export controls, embargoes and sanctions embargoes and sanctions.

Protection of resources: Suppliers are expected to respect the principles of confidentiality related to data and information (GDPR), ensuring compliance with international laws and treaties on the protection of intellectual property and confidentiality.

1. A conflict of interest may arise when an employee works simultaneously for a customer, supplier or competitor, as well as having a significant interest, directly or indirectly, in them.

2. Anti-corruption areas of attention include receiving/extending gifts and invitation, interacting with public officials, facilitating payments, and the use of intermediaries to perform business)

3. Examples of prohibitions include price fixing, manipulation of bidding procedures, allocation of markets, territories or customers between competitors, and boycotting or unequal treatment of certain customers or suppliers without good reason. between certain customers or suppliers without good reason.

ZOOM : ABIDING BY THE FRENCH SAPIN II LAW

Suppliers agree to abide by GreenYellow's principles and to ensure that their suppliers and subcontractors also abide by them. They agree to implement a compliance program to detect and prevent corruption, including internal rules that prohibit and sanction corruption, an employee awareness campaign, third-party evaluations and appropriate control systems.

Policy on Gifts and invitations

Gifts and invitations can sway judgement and influence transactions. GreenYellow employees shall not use their position at the Group to obtain personal gain. A written authorization must be delivered before accepting or offering any gift. GreenYellow suppliers shall not offer any gift with the aim at influencing transactions. Gifts given to or received by customers, suppliers, service providers or partners are not necessarily inappropriate to the extent that: (i) they are of an insignificant amount, (ii) they are made on an exceptional basis, (iii) they do not, under any circumstances, influence or appear to influence a business decision. GreenYellow employees may only accept invitations as part of their professional activities and such invitations cannot be of a nature, value and/or frequency that would raise questions as to your legitimate motives or influence you in an illicit way.

Donations and sponsoring

The Group prohibits making or recommending a sponsorship or charitable donation for the purpose of improperly gaining a benefit from or for GreenYellow, improperly securing business from or for GreenYellow, or otherwise gaining favor with a third party.

Lobbying and political actions

GreenYellow employees should refrain from offering, in any manner whatsoever, money, gifts or invitations, directly or indirectly, to public officials. Making political contributions in the Group's name to candidates, political parties, organizations, and other political entities (regardless of the government agency) is also prohibited. While members of personnel are free to volunteer in political activities on a personal basis, they may not use the Group's name, funds, assets, resources or employee lists. In the same way, individuals working for the Group may not canvass during working hours to make political contributions. The Group strictly prohibits facilitating payments.

Whistle-blowing system

If you are aware of a situation or behavior that conflicts with the Code, you must inform the Ethics Officer as soon as possible by phone and/or by sending a message to the dedicated, confidential email address, available 24/7, set up for this purpose.



As part of its CSR policy, GreenYellow aims at carrying out responsible procurement operations and commits to support its supply chain ecosystem in a continuous improvement process towards this goal.

Through annual surveys, frequent checkpoints and informational campaigns (podcasts, webinars, trainings on climate), GreenYellow seeks to encourage and better understand its suppliers, to provide them with the relevant tools and methods they need.

Together let's impulse positive change !

By signing this code, I acknowledge having read the document and commit to ensure full compliance with its terms and engagements.

Company

First name

Last name

Role

Date

Signature