

Responsible purchasing policy

In line with its Corporate Social Responsibility (CSR) commitments, NYCO has defined a responsible purchasing policy.

Purchases being a key pillar of our sustainable development strategy, we require our suppliers and business partners to take part in this initiative. This initiative will allow NYCO to favor the collaboration with actors contributing to the creation of a responsible and efficient supply chain¹.

Therefore, aspects linked to business ethics, health, security, environment and carbon footprint will henceforth be taken into consideration when selecting and assessing NYCO's suppliers.

This charter represents NYCO's commitments as well as expectations from its suppliers for responsible purchasing practices operated in a partnership.

Suppliers' commitments:

- 1. Acknowledge and sign this code of conduct,*
- 2. Take all necessary actions to respect its commitments and promote this code of conduct to its own subcontractors.*

NYCO's commitments towards its suppliers:

- 1. Apply our ethical charter internally,*
- 2. Comply with laws, regulations and contractual commitments with our partners,*
- 3. Ensure the continuous evaluation of our suppliers.*

¹ Responsible and efficient supply chain: promoting collaboration, innovation, local and circular economy and taking into account global costs and socio-environmental risks.

Business partners code of conduct

NYCO's ethical charter defines behaviors expected of employees, management and partners*. Please read this ethical charter carefully and involve your partners in following its principles.

*Business partners include suppliers, subcontractors, agents, resellers, ...

Summary of the paragraphs from NYCO's ethical charter, directly applicable to suppliers and business partners.

Humans Rights and work

Respect for human rights

The partner ensures respect for Human Rights particularly by complying with the fundamental conventions of the International Labour Organization (ILO). The partner must be committed to comply with regulations in force in all the countries in which he operates.

Security, health & well-being at work

The partner must provide an environment that guarantees the safety, physical and mental health of its employees while they carry out their duties. It must make every effort to provide pleasant working environment meeting applicable health and safety standards

Product safety and data confidentiality & protection

The partner must be committed to the highest level of quality and security for all its products range. It must also respect its confidentiality duty and protect NYCO's confidential data.

Child labor

Child labor is a form of exploitation violating the European Convention on Human Rights and NYCO will strongly reject using or benefiting from it. Additionally, our suppliers and subcontractors may not employ anyone under the legal minimum age determined by local law or anyone who has not completed compulsory education.² Any failure by our suppliers to comply with local and international standards on children's rights may lead to penalties, including the termination of our contract with them.

Business ethics and compliance with regulations

Our partners must follow NYCO's commitments regarding business ethics.

In accordance with NYCO's Quality Policy and our values and ambition, our fundamental principle is to comply with regulations in force in all the countries in which we operate.

Therefore, our business partners must strictly follow applicable local standards and regulatory systems as well as international laws and regulations.

Moreover, our partners must be committed to acting in an ethical, loyal, and professional manner in their relationships with all market stakeholders, whether they are public authorities or commercial business partners.

Export control and trade sanctions

Governments enact export control laws and impose sanctions and embargoes in order to protect certain interests, such as national security and countering arms proliferation.

The partner must be a reliable exporter as any violation of these laws can have serious consequences such as bringing our business activities to a halt or incurring financial penalties. Therefore, in compliance with our international trade policy, before negotiating or working with a third party, exporting, re-exporting, or transferring controlled goods, we must ensure that the export control laws of the competent jurisdictions are respected.

² *Convention on the right of the child, article 32:*

«States Parties recognize the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development. States parties provide for a minimum age or minimum ages for admission to employment.»

Respect for partners and local authorities

In the context of inspections or investigations, the partner agrees to provide authorities with complete and accurate information.

All stakeholders should be treated ethically and with integrity.

In practice

For example, it is necessary to:

- Show good manners in communities, particularly by being polite, kind, and respectful of social and cultural traditions in the communities and countries in or with which we work,
- Prohibit all forms of discrimination, sexism, and harassment. Such behaviors are contrary to NYCO's values and are therefore strictly forbidden.

Fair competition

Regarding competition, the partner abides by the laws applicable in the countries in which it operates. Moreover, arrangements or tactics likely to restrict or distort competition or trade are prohibited. Under no circumstances may the partner obtain competitive information in unlawful or unethical ways, such as bribery.

Financial transparency

It is the partner's duty to ensure that financial transactions are recorded accurately, completely, and clearly in our books and ledgers. All invoices sent to NYCO must be in writing with a sufficient and accurate description of all the goods and services supplied, as well as applicable expenses. The respect of such practices allows to fight against money laundering.

Corruption & influence peddling

It is the partner's duty to act in strict compliance with applicable legal rules. Consequently, any partner partaking in such acts is liable, in addition to the penalties provided for by law, to disciplinary action which could include termination of the contract with NYCO.

In Practice

We do not tolerate any offer, promise, or giving of money or any other item of value (gifts, invitations, etc.) as facilitation payments, whether directly or indirectly, to:

- A public official,
- A political party or politician,
- A trade union or trade union member,
- Charity organizations or organizations of a similar nature, with the aim of obtaining any advantage from a public official,
- An employee or representative of another company that could induce them to be disloyal to their company.

Suppliers

In the event that such practices are discovered at a supplier, the latter undertakes to:

- Ensure and monitor compliance with the anti-corruption obligations,
- Immediately notify NYCO in writing of all the details of the violation of this obligation,
- Allow NYCO to inspect, audit, and make copies of all books and ledgers relevant to the contract and to each purchase order.

If NYCO has a reason to believe that a supplier has violated any of the requirements set forth in this provision in any respect, penalties may be imposed, including the termination of its contract with the supplier.

Gifts policy

Gifts and invitations between employees and partners must be of a strictly professional nature and comply with the NYCO's ethical principles.

Business decisions must be based solely on competitiveness, performance, quality of products and services, and responsible and/or sustainable approaches. No gifts will be given or accepted for the purpose of gaining an advantage.

In Practice

When receiving or offering gifts or invitations, it is important to:

- Inform your superior,
- Remain within reasonable limits,
- Decline any gifts or invitations not clearly of symbolic value,
- Consider how it might be perceived publicly and whether the gifts exchanged are liable to influence the impartiality of either party

Respect of the environment

The supplier must take into consideration sustainable development and environmental criteria when making decisions.

- Define and execute its carbon footprint and environmental management plan,
- Favor renewable energy and products,
- Reduce its energy consumption and waste generation,
- Communicate their products' environmental impact.