

"MECATRACTION Supplier Code of Conduct"

1. FOREWORD

MECATRACTION meets the needs of its customers through its extensive know-how and industrial resources. We design, develop and manufacture a complete range of industrial electrical connectors and wiring accessories. MECATRACTION has a corporate social responsibility (CSR) policy and has integrated its CSR approach into its strategy. The MECATRACTION CSR policy, which reflects its values, is in line with the guidelines of the international ISO 26000 standard.

MECATRACTION associates its suppliers, providers and subcontractors, hereinafter referred to as "supplier(s)") with its performance levels, which means that they must be closely associated with its CSR policy. The suppliers of MECATRACTION have a full role to play in this strategic approach. As part of its CSR policy, MECATRACTION wishes to supply its customers with products and services which are in line with its contractual commitments, taking into account their life cycles and benefiting from ecodesign; MECATRACTION expects its suppliers to contribute to the achievement of these goals. The MECATRACTION Supplier Code of Conduct expresses the principles which MECATRACTION expects its suppliers to commit to, as part of a common approach to continuous improvement and sustainable development.

ARTICLE 1: CSR PRINCIPLES

Suppliers undertake to comply strictly with all laws and other legal rules applicable in the countries in which they operate and to comply with the standards and norms of international law and, in particular, the standards and norms issued by the United Nations (UN), the International Labour Organization (ILO) and the Organization for Economic Co-operation and Development (OECD).

Furthermore, suppliers must develop and implement a CSR approach based on the guiding principles set out below.

1.1. Governance

Suppliers must adhere to principle of governance based on transparency vis-à-vis their stakeholders and on the prevention of risks, in line with their sector of activity. As such, they will communicate clearly to their stakeholders, providing them with truthful information about strategic objectives, financial situations and social and environmental management systems.

In particular, suppliers undertake to keep accurate and reliable records and to refrain from carrying out "off-the-books" transactions and collecting or disbursing non-deferred cash.

The practice of fair trade and respect for all laws and practices in force, including prevention of corruption, are permanent imperatives of MECATRACTION. Consequently, MECATRACTION expects its suppliers to comply strictly with the prohibitions laid down by the national and international texts applicable to the suppression of acts of corruption and money laundering, and that they undertake to deploy actions for preventing conflicts of interest and any form of corruption or trading in influence.

a. Prevention of conflicts of interest

Suppliers must prevent and avoid situations that create conflicts of interest. These situations particularly arise when the private interests of an employee or a representative of the supplier (or of a relative of that employee or representative) interfere with the interests of MECATRACTION.

b. Prevention of corruption

When dealing with entities (as well as employees and representatives of such entities), suppliers undertake not to offer, promise, give or solicit, directly or indirectly, benefits of any kind or monetary payments, in order to win a contract or derive any undue advantage or benefit from it.

c. Respect for competition

In the countries in which they operate, suppliers must conduct themselves in compliance with the laws and texts in force regarding free and fair competition.

1.2. Environment

Suppliers shall take appropriate and tangible measures to assess, avoid, limit and mitigate the risks and environmental impacts associated with their activities and, in particular:

- will ensure that their operations are carried out in strict compliance with the laws and environmental regulations in force in the countries in which they operate.
- will limit the environmental impacts of their activities, in particular by reducing, as far as possible, the consumption of energy and natural resources, producing as little waste as possible, controlling their effluent emissions and all other forms of pollution.
- will prevent and mitigate risks to public health (hazardous materials, radiation, etc.).
- will ensure that the products and services they supply do not contain any substances or preparations which are hazardous to humans and/or the environment and are prohibited by the laws and/or the regulations applicable in the countries in which they operate.
- will promote an environmental management system that makes it possible to assess and prevent risks linked to their activities and to raise awareness among their employees and suppliers.

1.3 Human rights and social issues

Suppliers must comply with local legal standards applying to them in the field of employment and industrial relations, and must also comply with international standards in this field, in particular:

- the OECD Guidelines for Businesses.
- the principles laid down in the Universal Declaration of Human Rights, the Declaration on the Elimination of Discrimination Against Women and the UN Declaration on the Rights of Children.
- the principles laid down by the eight fundamental Conventions of the ILO, namely:
 - Conventions No. 29 and No. 105 prohibiting the use of forced labour.
 - Conventions No. 138 and 182 concerning child labour and minimum working ages.
 - Conventions No. 87 on Freedom of Association and Protection of the Right to Organize and No. 98 on the Right to Organize and Collective Bargaining.
 - Conventions No. 100 on equal remuneration and No. 111 on discrimination: employment and training.

In particular, suppliers:

- will refrain from employing anyone illegally, in particular by employing a foreigner who has no legal title or permit required by local law (and, for an EU citizen, by Community law).
- will ensure fairness of treatment between their employees by prohibiting discrimination on the grounds of origin, morals, sex, age, political or religious opinion, trade union membership or disability; consideration of the nationality of persons must be limited to the exceptions provided for by applicable national laws and, in particular, those relating to the protection of national interests.
- will provide a framework that supports the employment of people with disabilities (depending on applicable local legislation).
- will safeguard the health and safety of their employees in the workplace, taking all reasonable measures to ensure the physical health of employees, preventing accidents at work and occupational diseases (training of staff, occupational healthcare and safety procedures, etc.);
- will commit themselves to comply with best local practices and to promote progress in social coverage and dialogue / agreement.
- prohibit any inhuman behaviour or actions towards their employees, such as verbal or physical abuse, bullying or sexual harassment.

ARTICLE 2: IMPLEMENTATION OF THE CODE OF CONDUCT

2.1 Contract value and scope of consolidation

Once the Supplier has committed to comply with the Code of Conduct through a signed Deed of Undertaking, this Deed of Undertaking (including the Code of Conduct) is deemed to be an integral part of all Contractual purchasing documents signed by MECATRACTION and the supplier in question (these contractual purchasing documents being hereinafter individually or collectively referred to as the "Purchase Contract(s)").

"MECATRACTION entity" means:

MECATRACTION SA, a French company with registered office at ZA Les Hauts de Chignac - 19231 POMPADOUR Cedex France.

2.2 Supplier Commitments

Suppliers must comply with all applicable laws and other legal requirements in their respective countries. If the principles laid down in the Code of Conduct are more stringent than the legal rules applying in the supplier's country, these principles shall prevail, provided that they are compatible with the applicable public laws in that country.

By signing the Code of Conduct, each supplier accepts its terms and undertakes to comply with it strictly regarding MECATRACTION.

MECATRACTION expects its suppliers to implement this commitment over time to strive to promote, within their respective spheres of influence, behaviours that comply with this Code of Conduct.

2.3 CSR Performance Assessment - Progress

As part of the assessment and selection process, suppliers are required to respond to all CSR questionnaires sent by MECATRACTION in this regard.

Furthermore, suppliers undertake to notify MECATRACTION of any event that calls into question the accuracy of the information they provided during the assessment and selection process and/or any audits conducted by MECATRACTION.

In the event that it appears that a supplier is not in a position to fully comply with certain obligations of the Code of Conduct, this supplier and MECATRACTION may agree, depending on the difficulties encountered, to implement a progress plan which will be implemented the supplier within a short timeframe, with the aim of maintaining a strong and lasting relationship between the supplier and MECATRACTION.

2.4 Audits - Consequences for non-compliance with the Code of Conduct

MECATRACTION reserves the right to audit its suppliers in order to ensure that they respect and implement the principles of the Code of Conduct.

The suppliers undertake to cooperate in carrying out the audits, which will be conducted under conditions to be agreed, either by MECATRACTION or by external auditors authorized by MECATRACTION. However, if the supplier already regularly uses an independent and reputable auditing body in the CSR field, MECATRACTION may use the results of audits they carry out, provided that the corresponding audit reports are available for consultation by MECATRACTION and that said organization is approved by MECATRACTION.

In the event of serious or repeated failures by a supplier to comply with the obligations of the Code of Conduct, MECATRACTION reserves the right to terminate any Purchase Contract signed with this supplier, without prejudice to any damages that may be claimed by MECATRACTION.

ARTICLE 3: DISSEMINATION OF CSR PRINCIPLES

The suppliers of MECATRACTION also undertake to make every effort to promote and disseminate the principles of this Code of Conduct to their own suppliers, providers and subcontractors and to convince them to implement these principles.

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