



## ICAPE Group Supplier Ethics Policy

ICAPE Group has a strong commitment to integrity and social responsibility. Our group is committed to ensuring business is conducted in a way that promotes ethical behavior and legal compliance. ICAPE Group and/or its affiliated entities worldwide (ICAPE & CIPEM) are committed to the highest standards of business integrity and ethical compliance in their dealings with suppliers. All our employees and partners work hard to create and foster an environment that values integrity, openness and mutual respect.

Compliance with legal and ethical standards is the responsibility of everyone in the supply chain ecosystem at every level. All ICAPE Group Suppliers and employees are expected to conduct themselves with the highest standards of honesty, fairness, and personal integrity, with adherence to all applicable laws.

### 1. Local regulatory compliance

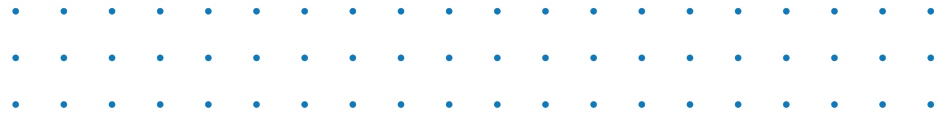
ICAPE Group asks each of our suppliers to respect the laws of their province or country. No current industry practice can be opposed to this request. ICAPE Group will favor all companies doing better, in ethical terms, than the minimum set up by the laws and regulations of their country. These laws, policies and regulations include:

- Equal employment
- Anti-discrimination and harassment
- Human rights
- Anti-corruption and bribery
- Conflicts of interest
- Health and safety
- Environment
- Confidentiality
- Codes of business conduct

### 2. Anti-corruption policy

Corruption violates clients' trust, threatens economic and social development, and hurts fair trade. All forms of corruption, such as bribery, extortion, and embezzlement, are strictly prohibited. We ask each of our suppliers not to try to attempt to bribe any of our employees or customers. We ask all our employees not to develop a financial or any other relationship that could involve a financial benefit or other personal or competing interest. We also ask them not to be involved in any activities which might create a conflict of interest between themselves, ICAPE Group and its customers.

Our suppliers are committed to promoting this policy with their own suppliers, customers and employees. They understand that this is the only way to build a strong, sustainable and fair business partnership.



### **3. Labor laws**

ICAPE Group suppliers must comply with the labor laws and regulations of their own country. Supplier shall ensure that no underage labor has been used in the production or distribution of their goods or services. Employees must not be younger than the minimum employment age established by the respective country or local jurisdiction. All employee working hours must be in compliance with all applicable laws and regulations. ICAPE Group suppliers must have a system in place to verify and accurately record payroll, deductions and the hours worked by legally authorized employees. Suppliers must comply with all applicable wage and compensation requirements as defined under applicable labor laws.

### **4. Environment protection**

Suppliers undertake to respect the environmental regulations of their country in order to protect nature and neighboring populations. For PCB-related activities, and whenever necessary, they confirm that they have a professional wastewater treatment plant, respecting the level of discharges authorized by local and national authorities for their activity. Suppliers understand that copper and some other metals have a negative impact on the environment if they are released without treatment.

### **5. Human rights protection**

Forced or prison labor are in no way allowed. All conditions of employment must be based on the individual's ability and not on other personal characteristics or beliefs. ICAPE Group will not accept any company that discriminates on the basis of race, color, sex, national origin, sexual orientation, religion, disability or any other similar factor. Suppliers must respect employees' right to decide whether or not to join a group, provided that these groups are legal in their own country. Suppliers must not hinder compliance with these laws.

Only workers legally entitled to work may be employed by suppliers. The legal status of all workers should be checked by examining original identification documents (not photocopies) before allowing them to start working. ICAPE Group will not work with suppliers who harass, through disciplinary mental or physical practices, their employees.

### **6. Safety compliance**

ICAPE Group suppliers must provide adequate processes, machines, storage and procedures to ensure their employees have a safe and healthy work environment. Suppliers are committed to making every effort to improve their facilities and work procedures to achieve this safety goal. Suppliers must also have all the necessary medical facilities and fire-fighting equipment in their field of activity to protect their workers. They also undertake to closely control all shipments to ensure that no illegal substances or products are introduced into our shipments. (such as drugs, explosives, bio-risk substances and / or any other contraband products).



## **7. Fair living conditions**

Suppliers who provide and are responsible for the housing and food of their employees must ensure a safe, healthy and reasonable environment for this purpose. ICAPE Group will not work with companies that do not respect a minimum of rules, such as the number of people in a room, the elimination of water, the disposition of toilets, etc.

## **8. Confidentiality & Intellectual Property Rights, Privacy, and Data Protection**

ICAPE Group suppliers are required to respect the reasonable privacy and confidentiality expectations of our customers, and appropriately protect all data that may come into their possession because of their relationship with ICAPE Group. They agree to comply with all restrictive rules relating to non-disclosure agreements signed by ICAPE with its clients. They agree not to disclose any information to third parties without the agreement of ICAPE and its customers. They will protect all the information of the company ICAPE and the customers, by using them only in an appropriate way in the exercise of their functions. This includes data relating to ICAPE Group, ICAPE Group employees, customers, and partners, and entails compliance with ICAPE Group's instructions and privacy, data protection, and security laws and regulations when personal, confidential, proprietary, or other sensitive information is collected, stored, processed, transmitted, or shared.

## **9. Fairness & Equity**

Our suppliers understand that only fairness, honesty and respect in our relationships with our partners will lead us all to success. This is why they commit to respect such a code of conduct in order to properly deal with our customers, their suppliers and their partners. They understand that this is the only way to create equitable and long-term partnerships in the business world.

## **10. Right of inspection at suppliers**

Our suppliers agree to give ICAPE Group access to their factories to verify that they comply with the rules of the code of ethics set by ICAPE Group and signed by these suppliers.

Our inspections may be unannounced and may be performed by a third party if necessary and at the request of our end customers. During these inspections, we will have the right to talk to employees without the presence of a factory manager and take pictures of non-compliant situations, if necessary. Retaliation against employees who report abnormal situations will not be tolerated and will be severely condemned. ICAPE Group will not work with suppliers who do not respect these principles.



By accepting this ethics Policy, our suppliers agree to do their best and progress with us to best meet all these requirements. Suppliers are responsible for ensuring that any employee, subcontractor, agent, or other third party assigned to provide services to ICAPE Group, as permitted by agreement with ICAPE Group, acts consistently with this Policy.

ICAPE Group will conduct regular unannounced audits and we will communicate the results and the rating to the management of the plant concerned. ICAPE Group undertakes to keep the results of these audits strictly confidential between the supplier and the management of ICAPE Group. We agree not to disclose to anyone or to any third party the detailed results of our audits.

ICAPE Group will require a corrective action plan for suppliers if a serious non-compliance is discovered. If the supplier does not agree within a reasonable time to correct all such non-conformities, then ICAPE Group may have to decide to terminate its activities with the supplier in question.

Through this ethics Policy, we intend to:

- Protect the reputation of our customers and ours
- Conform to the values of developing countries
- Allow customers to differentiate responsible companies like ICAPE Group from those whose financial objectives surpass ethical laws whatever the costs may be for the environment and mankind.

We hope that each supplier will understand how important it is to have a strong commitment to integrity and social responsibility in order to lead the way towards a real sustainable development. There is no long term success without accountability and ethics. Respecting this ethics policy will enable our suppliers, our customers, our employees and ICAPE Group to achieve real and lasting global success.

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