



RESPONSIBLE PURCHASING GUIDELINES

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LYNRED complies with applicable laws and regulations of the countries in which operations are managed or services provided. LYNRED supports the enforcement of international ethical and business-related compliance standards.

The relationship between LYNRED and its suppliers and contractors is essential for the development of its activities. For this reason, LYNRED commits itself to pursue fair and honest behaviour in all circumstances in its ethical guidelines available on www.LYNRED.com. Each LYNRED' employee shall comply with, in all circumstances, and in particular within suppliers and contractors' relationship.

Corporate social responsibility can only be supported within strong commitments from upstream to downstream of the supply chain, LYNRED expects from its suppliers and contractors to comply with all laws and regulations applicable to them and, by signing this Responsible Purchasing Guidelines, to implement and deploy in their organization and with their own suppliers and contractors principles at least equivalent to those set out in this Responsible Purchasing Guidelines wherever they operates, what is undertaken by signing this document.

Ethical criteria are of essential ones in the selection and keeping of suppliers and contractors on LYNRED' panel. Suppliers are periodically evaluated regarding these subjects and any discrepancies shall result in an action plan to restore a satisfactory level of requirements. Any material breach to these commitments will induce contractual consequences which may lead to an exclusion from the panel.

As part of its sustainable development initiative, LYNRED undertakes that:

- Suppliers selection shall be based on objective criteria, following a transparent purchasing process ;
- Purchasers shall act with integrity, in all circumstances, free from any risk of conflict of interest ;
- Confidentiality and Intellectual Property' suppliers shall be protected ;
- Anti-corruption processes shall be implemented in suppliers' selection ;
- Economic dependence risk on suppliers shall be measured and controlled during all the business relationship.

This Responsible Purchasing Guidelines is established in accordance with LYNRED' commitments in these areas, and is inspired by the *International Forum on Business Ethical Conduct*¹ *Code of conduct*. This Responsible Purchasing Guidelines is not intended to replace any more restrictive laws or regulations applying to the suppliers and contractors, which shall prevail in all circumstances.

¹ IFBEC (Forum international sur la Conduite Ethique des Affaires)

1 PROMOTION OF AND RESPECT FOR HUMAN RIGHTS

Suppliers and contractors must comply at all times with Fundamental Conventions of the International Labour Organization regarding respect and dignity of the person, and comply with all laws and regulations aiming at ensuring respect of human rights and fundamental freedoms wherever they operate.

1.1 CHILD LABOUR

LYNRED forbids itself from using suppliers and contractors who use illegal child labor. Suppliers and contractors must ensure that they do not use them directly or indirectly for their activities.

The term « child » refers to any person under the legal employment age in the country in where the work is performed, provided that this legal age is in accordance with the provisions of the International Labour Organization.

1.2 HUMAN TRAFFICKING

Suppliers and contractors must comply with regulations prohibiting human trafficking, forced labor or any other form of servitude, as well as applicable local laws in the countries where they operate. They must ensure the application of these principles in their supply chain and must remedy any negative impact on human rights in their activities.

2 EMPLOYMENT PRACTICES

Suppliers and contractors must treat their employees with respect and dignity, encourage diversity, and promote equal opportunity.

2.1 HARASSMENT

Suppliers and contractors must provide their employees with a secured working environment, free from any physical or psychological harassment, whether direct or indirect, and more generally from any form of abusive behaviour.

2.2 NON-DISCRIMINATION

Suppliers and subcontractors must ensure that no form of discrimination in terms of access to employment and career pathways is used, and shall promote diversity, including by promoting and using the employment of people with disabilities.

2.3 WAGE AND BENEFITS

Suppliers and contractors must ensure fair remuneration of their personnel, which may not be less than the minimum wages required by local laws and regulations. They recognize the principle of equal pay for men and women, and ensure that they are paid for all statutory or overtime hours worked, including overtime bonuses where required by law or regulation.

2.4 WORK HOURS

Suppliers and subcontractors shall ensure reasonable working hours for their personnel, at most equal to or less than the maximum working hours established by the laws and regulations in the countries of employment.

They undertake to respect in all circumstances the rest periods and vacation periods imposed by the law or regulations applicable in the country of employment.

2.5 HEALTH AND SAFETY

Suppliers and contractors are committed to implement effective policies regarding the health and safety of personnel in their workplace and during their work, established on the basis of an analysis of the risks to which personnel would be exposed, in relation to their own activity. They must ensure the health and safety of their employees, contractors, visitors, and more generally any person who may be affected by their activities. They must comply with applicable laws and regulations regarding health and safety at work.

2.6 LABOUR DIALOGUE

Suppliers and contractors recognize the unionisation, the right of workers to form an organization and the right of any worker to join or not to join a Union of their choice. They shall ensure that employees who are members of such Unions are protected from discrimination and reprisals. They undertake to promote and encourage social dialogue whenever required by law, and whenever the opinion of employees is relevant.

3 CULTURE OF INTEGRITY

In accordance with its ethical guidelines and internal Code of Conduct, LYNRED selects its suppliers and contractors on the basis of objective criteria taking into consideration the principles set out in this Responsible Purchasing Guidelines.

LYNRED expects from its suppliers to adopt and promote an equivalent approach in their relations with suppliers and contractors, and more generally in all their relations.

3.1 ANTI-CORRUPTION AND ILLEGAL PAYMENTS

Suppliers and contractors undertake to comply with the international anti-corruption laws and regulations in force in the countries where they operate.

They shall prohibit any financing of illegal activities and inappropriate payments, whether in the form of money or by any other means, to any person representing public authorities, political parties or any other person with a view to obtaining any advantage or exercising undue influence. This includes payments intended to expedite or secure normal procedures such as granting by governments of authorizations, visas or other procedures, to the exception of cases of personal safety concerns in event of imminent threats to health or safety.

3.2 COMPETITION AND ANTI-TRUST

Suppliers and contractors undertake to work fairly on the markets, and in particular they shall refrain from any act aiming at colluding or creating a connivance with competitors or upstream or downstream operators, intended to direct competition other than on the basis of objective criteria of quality of their products. Any agreement on prices, offers, commercial conditions, or aiming at market sharing is prohibited.

3.3 FRAUD AND INSIDER TRADING

Suppliers and contractors must not under any circumstances take advantage of fraudulent acts, deception or falsification, or allow any third party to do so. This also includes theft within their organization and from their partners, as well as misappropriation and unauthorized use of goods.

3.4 GIFTS AND BUSINESS COURTESIES

Suppliers and contractors must ensure that their products and services, or those procured from their own suppliers or subcontractors, are supplied on the basis of objective quality criteria and free from any influence related to the offer or receipt of gifts and business courtesies.

They must ascertain the policies and laws applicable to their partners and market practices before offering any gifts and business courtesies, and ensure that they cannot be interpreted as being intended to obtain a contract, decision or any other advantage.

3.5 CONFLICTS OF INTEREST

Suppliers and contractors shall ensure the integrity of their relationships and in particular the absence of conflicts of interest, or any situation likely to be assessed as such. They undertake to take the necessary measures to notify concerned parties in the event of a potential or proven conflict of interest. This includes any conflict between the interests of LYNRED and personal interests, or those of parents, friends or associates.

4 COMPLIANCE WITH INTERNATIONAL, IMPORT AND EXPORT REGULATIONS

4.1 EXPORT AND IMPORT

Suppliers and contractors shall comply with the laws and regulations applicable to the import and export of parts, components and technical data, both in the performance of their activities and in the use of the products and services delivered by LYNRED. They must provide LYNRED with accurate and precise information on classification and applicable legal and regulatory requirements and obtain all necessary authorizations for their export to LYNRED.

4.2 SANCTIONS AND EMBARGOES

Suppliers and contractors must comply with all laws, regulations and international sanctions applicable to imports, exports and associated financial flows, in certain countries, for certain activities, or taken against certain entities.

4.3 RESPONSIBLE SOURCING OF MINERALS

Suppliers and contractors must comply with applicable laws and regulations regarding sourcing of minerals from conflict or high-risks zones (tin, tantalum, tungsten and gold). They must establish and ensure compliance with a policy that allows them to reasonably ensure that the minerals present in their products, or used in the context of the service entrusted to them, are not used, directly or indirectly, to fund armed groups whose activities violate human rights, and implement due diligence procedures for this purpose.

4.4 COUNTERFEIT PARTS

Suppliers and contractors must implement and maintain effective methods and processes to ensure that their products or services do not contain counterfeit parts and materials, or do not meet the quality and safety criteria expected and knowingly placed on the market.

5 FAIR AND TRANSPARENT ACTIVITIES

5.1 LOYALTY RELATIONSHIPS

Suppliers and contractors must conduct their relations in a fair manner, both with regard to LYNRED and to their own suppliers and contractors, so as to limit the effects of any form of dependence, in particular by anticipating the end of the relations.

They must offer fair prices for the goods and services provided, taking into account their quality and performance, and remunerate the goods and services they purchase in accordance with their market value.

5.2 RELIABLE ARCHIVING OF DATA

Suppliers and contractors must keep reliable records and not make any changes to data in order to conceal or misrepresenting the reality of an item of information. All records, regardless of their format, produced or received as part of a business transaction, must clearly and fully describe the purpose of the transaction.

5.3 PERPETUAL IMPROVEMENT AND AUDITS

Suppliers and contractors must allow access to LYNRED or any third party designated by LYNRED to ensure the compliance of the processes implemented in their organization, and to commit in a process of continuous improvement of their processes.

6 INFORMATION PROTECTION

6.1 PROTECTION OF CONFIDENTIAL INFORMATION

Suppliers and contractors are bound by confidentiality obligations and must treat the information transmitted to them appropriately. In any case, this information must not be used for purposes other than those for which it was transmitted, except with the prior consent of the initial owner, even after the end of the relationship.

LYNRED may request the special treatment of certain information through the implementation of high security requirements. Suppliers and contractors shall take all necessary measures, including the use of access control and encryption methods, in accordance with these requirements.

6.2 INTELLECTUAL PROPERTY

Suppliers and contractors must comply with applicable laws regarding intellectual property rights claims, including protection against disclosure, patents, copyrights and trademarks.

They must ensure recognition of authorship of rights and refrain from any misuse or unauthorized use of third parties' intellectual property rights.

6.3 SECURITY AND PROTECTION OF PERSONAL DATA

Suppliers and contractors may collect or receive and process personal information in the context of their relationship with LYNRED. They must have procedures in place to process this information in accordance with the applicable regulations on the protection of personal data. In particular, they must implement all required security requirements, whether physical or logical, in order to prevent any loss, misappropriation, alteration, access or unauthorised use.

7 INVOLVEMENT OF OUR SUPPLIERS AND PARTNERS IN IMPLEMENTING SOCIAL RESPONSIBILITY REQUIREMENTS

LYNRED expects a strong involvement of its suppliers and contractors in the dissemination of the principles described in these Responsible Purchasing Guidelines.

7.1 WHISTLEBLOWER PROTECTION

Suppliers and contractors must implement procedures that allow their employees to freely express any situation likely being contrary to laws and regulations, as well as fundamental ethical principles, without fear of reprisals. It is also their duty to take the necessary measures to prevent such situations, and not to allow infringing acts to go unpunished.

7.2 REDUCTION OF ENVIRONMENTAL IMPACT

Suppliers and contractors shall adopt an approach to conducting their activities, developing and producing technologies, processes and items with the lowest possible environmental impact throughout their life cycle.

In particular, this approach must serve to reduce greenhouse gas emissions, preserve natural resources and control the treatment and recycling of waste.

7.3 CONSEQUENCES FOR VIOLATING THESE GUIDELINES

In the event that the principles of these Responsible Purchasing Guidelines are not respected, the relationship with the supplier or contractor may be reviewed, and corrective actions will be implemented. LYNRED reserves the right to terminate the relationship in accordance with the contractual stipulations, without incurring any liability, if no corrective action is taken.

7.4 ETHICS POLICY

Depending on the size and nature of their activities, suppliers and contractors must implement management systems to ensure compliance with laws and regulations in their organization, as well as the principles set forth in the Responsible Purchasing Guidelines. Suppliers and contractors are encouraged to set up their own charter or code of conduct to be transmitted to their own suppliers and contractors to disseminate these principles and ensure their compliance.

LYNRED expects its suppliers and contractors to implement effective ethical compliance programs and to promote ethical practices within their organization at all times and beyond mere compliance with laws and regulations.

COMMITMENTS BY SUPPLIERS AND SUBCONTRACTORS

I, the undersigned, Mr. or Mrs _____ (First name, Last name),
acting as _____ (specify the role), empowered to make a
commitment on behalf of the company after reading the principles of the LYNRED Responsible
Purchasing Guidelines,

Commit to uphold these principles without reservation and that the necessary means will be
deployed to enable the company to comply fully with it, and to pass on these requirements to its
own suppliers and contractors.

Company name and stamp:

Name and function of signatory:

Date:

Signature:

HISTORIQUE DES REVISIONS			
Date	Auteur(s)	Version	Commentaire
19/10/2019	Sandrine BAINGUI	1.0	Première version du document
25/11/2020	Ondine SAMIE	1.1	Version anglaise du document