


# THIRD PARTY BUSINESS PRACTICES

A guide to do business with integrity



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# The relationship with our partners

At ABL Europe, we value our responsibility to the local communities in which we operate and to the global community. Our commitment to high quality service and ethics is a result of our involvement with these communities.

**ABL Europe's principles, policies and procedures adhere to the highest ethical standards.** That's why we are committed to maintaining relationships with business partners who share our principles and are committed to an ethical approach.



By "partners" we mean any person, public or private company, association, foundation or organization that supplies us with items (suppliers) or services (providers) or works on our behalf (subcontractors).

## Our expectations






**Our main objective is that you agree without reservation to comply with the laws and regulations in the countries where we operate.** In addition to the legal framework, we expect you to have a strong commitment to ethical practices.

We are aware that all ethical principles may come up against cultural diversity. Our expectations have therefore been established taking into account this diversity factor (laws, cultural habits, etc.).

## Our main principles

### Business ethics and fairness in the marketplace

All of your activities must be conducted away from the harmful influence of corruption and bribery. No bribery, illegal gifts or other types of improper payments will have any place in your partnership with ABL Europe. By **improper payment**, we mean **the offer of anything of value**, directly or indirectly, **to influence**, fairly or unfairly, a business interaction. This includes bribery, bribes, inducements or gifts to a public official, customer or potential customer, supplier, service provider or to any third party for the benefit of such persons.

-  **It is essential that you comply with all applicable anti-bribery laws:** the Sapin II Law, the Criminal Code, the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA) as well as all other laws enacted under the Organisation for Economic Cooperation and Development (OECD) Anti-Bribery Convention.
-  **Under no circumstances you should give, promise or offer any payment or gift (regardless of value) to a public official or government representative or public official.** This includes ministers, secretaries, legislators, judges, elected officials, candidates, and any official or agent of a public international organization and, in some countries where the hospital system is government-controlled, doctors and hospital employees.
-  **You must not induce or permit others to offer or make improper payments as described in this section.** Similarly, you may not solicit or receive improper payments or induce others to do so.
-  You must **not offer benefits** (free goods/services, business contracts...) to ABL Europe employees (including former employees) in order to **facilitate business relations** with the company.
-  It is your responsibility to **report to us if you, your company or close affiliates have been the subject of, or have been threatened with, any criminal or administrative investigation, legal action or enforcement proceeding related to non-compliance with anti-bribery laws** within the past five years or during your relationship with ABL Europe.

You must not have **any conflicts of interest** that would impair your ability to make business decisions with integrity.

Conflict of interest refers strictly to "any situation of interference between a public interest and public or private interests that is likely to influence or appear to influence the independent, impartial and objective exercise of a function" (*Law No. 2013-907 of October 11, 2013*).

A "conflict of interest" occurs when your private interests interfere in any way, or even appear to interfere, with the interests of your company. **You must avoid, and ensure that your employees, vendors and subcontractors avoid, any relationship, influence or activity that may interfere, or even appear to interfere, with your ability to make objective and fair decisions in the course of your work.** A conflict of interest situation may arise when you perform a service, have had or have a business relationship or make a financial investment that makes it difficult for you to perform your job objectively and effectively for your company. Conflicts of interest may also arise when you or your colleagues or family members receive **personal and undeserved benefits** because of your position within your company in connection with the business relationship with ABL Europe.

If this is the case, you should immediately report it to your company and to ABL Europe for resolution in accordance with the anti-bribery policy.

You must adhere to and apply the principles of fair competition and comply with all applicable laws and industry codes.

Your **business dealings** with us must be **honest and fair**. Do not manipulate or use tricks to gain an unfair advantage over our competitors.

It is your duty to keep **accurate accounting records** and consistent financial reports. You must also have internal financial control reports.



You must **ensure that the laws relating to international trade are respected**: the various authorizations necessary for the import, export or re-export of goods must be obtained before the transfer of a service or items from one country to another.

## Confidentiality and integrity of information

**It is imperative that you protect every confidential or personal information you receive from our company.** You should never use it for personal benefit.



You are required to comply with applicable local laws regarding the **collection, storage, use, retention and disposal of personal information.**

**Every piece of information** you provide to us must be **truthful and fair** and must not be used for deception.

Do not use or share non-public materials or information about ABL Europe for your personal benefit or the benefit of others.

## Fair work and respect of Human Rights

**ABL Europe strongly condemns any use of forced labor as well as the exploitation of children at work.** We therefore require such a commitment from you as well as compliance with, among other things, the Duty of Vigilance Law n°2017-399 of March 27, 2017 and more generally, laws relating to slavery and human trafficking in all countries in which you do business. **It is also your responsibility to ensure that your suppliers and subcontractors comply with these laws.**

We expect you to have processes in place to ensure that :

- ✔ You never use **forced labor**, whether it is compulsory, required or involuntary in prison.
- ✔ You never use **child labor**. Note that the employment of young workers under the age of 18 must be limited to safe work, a condition that also applies to older workers.
- ✔ You provide a **work environment** free from **harassment** and **discrimination** (age, gender, color, religion, disability, ethnicity, etc.).
- ✔ You **pay your employees in accordance with applicable laws**, including minimum wage, overtime and mandatory benefits.
- ✔ The **work environment is healthy and safe** and respects the **dignity and privacy** of individuals. Employees have the ability to **communicate easily** with management about working conditions without the threat of retaliation, intimidation or harassment.
- ✔ You respect **workers' rights** by allowing them to join a union or employee committee.

You must not take part in any acts of violence, terrorism or sectarianism. **It is your duty to ensure that no third party with whom you collaborate is involved in such activities.**

## Health and Safety compliance

You must ensure **compliance with health laws and regulations** and thus respect the health and safety of your employees, subcontractors and local communities.

All your employees must be educated and trained on possible health risks.

Suppliers must:

- **Be proactive** with respect to **professional health and safety**, including establishing a team/coordinator responsible for defining and implementing a **Health & Safety policy** and a management system including emergency response plans.
- **Provide protective equipment** to employees and ensure access to adequate medical assistance and facilities.
- Establish **internal systems for the early detection and assessment of physical, chemical and biological risks** in the workplace and take all necessary measures to mitigate or eliminate these risks as soon as possible.

## Respect of the Environment and Animal Health

You must **comply with all environmental laws and regulations** (national and local).

Strive to **minimize your impact on the environment** as much as possible, with a view to continuous improvement.

Identify and manage environmentally dangerous chemical materials and ensure their safe handling, transportation, storage, recycling and disposal.

Suppliers must have internal systems for early detection and assessment of **environmental risks** and take all necessary measures to eliminate or mitigate these risks.



**Animals should be treated with dignity, including measures to reduce pain and stress.** Animal testing should be abandoned when **alternative solutions** are deemed scientifically valid and acceptable to regulators.

# Anticorruption Guide



**CORRUPTION** - understood in its strictest sense - refers to the fact that a person invested with a specific function (public or private) solicits or accepts a gift or an advantage of any kind with a view to performing, or refraining from performing, an act within the scope of his functions.

French criminal law distinguishes **two types of corruption**:

**\*Passive** bribery when a person exercising a public or private function **takes advantage of his or her function** by soliciting or accepting gifts, promises or advantages in order to perform or refrain from performing an act of his or her function. This person is qualified as **corrupt**.

**\*Active** bribery when a physical or moral person **obtains** or tries to obtain, **by means of gifts, promises or advantages**, from a person exercising a public or private function, that he/she performs or delays or refrains from performing or delaying an act of his/her function or an act facilitated by it. This person is qualified as a **briber**.

These 2 offences, although **complementary**, are **distinct** and **autonomous**. Their authors can be prosecuted and judged separately.

Corruption is said to be "**public**" when the bribe taker is a public official and "**private**" when the latter is a person who does not hold a public office.



## How to fix it ?

Due to **increasingly strict international regulations** and the significant damage corruption causes to the public good, companies must focus on **internal controls** to counter any risk of corrupt practices. Thus, countering corruption begins with the **commitment** of every employee to **respect** these business practices and to demonstrate **zero tolerance** for any dishonest act.



# Some additions

Your employees and co-workers should be aware of this policy.

ABL Europe expects you to adhere to the principles in all your business dealings on behalf of and in the interest of our company.

We have the ability to evaluate the performance of our business partners, either directly or through approved third parties, and to conduct supplier surveys to validate the application of our principles.

ABL Europe has the right to disassociate itself from partners who do not comply with the principles set forth in this Code and/or the applicable laws and regulations of the countries in which they operate.

## Reporting



If you notice any violation of our policies, laws or applicable industry codes, please report it promptly to your contact at our company.

You have also the possibility to send a notification at the following address: [ableurope.alertcenter.eu](mailto:ableurope.alertcenter.eu)

## Sanctions for non-compliance

With **zero tolerance** for dishonest and fraudulent practices, any deviation from this policy may result in immediate termination of our order or contract, payment of damages, and reporting of your actions to your management, notwithstanding any civil or criminal penalties you may incur personally and/or your company.

Your full adherence to these business practices is a prerequisite for entering into a contractual relationship with ABL Europe.