



SUPPLIER CODE OF CONDUCT



Haffner Energy

Decarbonize · Innovate · Regenerate

CONTENTS

Introduction	p. 3
1. Legal and regulatory compliance	p. 4
2. Human Rights and labor code	p. 4
3. Health and Safety	p. 5
4. Environment and Sustainability	p. 5
5. Business Ethics	p. 6
Conclusion	p. 6

SUPPLIER CODE OF CONDUCT

As a company listed on Euronext Growth in Paris, HAFFNER ENERGY is fully aware of the importance of maintaining high standards in its business activities in order to maintain the trust of its employees, partners, and the market.

HAFFNER ENERGY expects the same commitment from its Suppliers and has therefore drawn up this Supplier Code of Conduct, hereinafter referred to as the Supplier Code, specifically for their attention. The way in which Suppliers conduct their business affects not only their own activities, but also those of HAFFNER ENERGY.

For this reason, HAFFNER ENERGY attaches great importance to the choice of its Suppliers in order to ensure compatibility between them, which is the guarantee of a solid and lasting relationship of trust.

HAFFNER ENERGY expects its Suppliers to comply with the principles set out in this Supplier Code throughout the business relationship between the two parties.

The Supplier undertakes to require its contractors and subcontractors to comply with the Principles of this Supplier Code insofar as they are involved in the supply of products and/or services under the contract concluded with HAFFNER ENERGY.

In the event that the Supplier uses subcontractors, the Supplier must have its subcontractors approved by HAFFNER ENERGY. Only one level of subcontracting (RANK 1) will be accepted.

1.

LEGAL AND REGULATORY COMPLIANCE

HAFFNER ENERGY's suppliers formally commit to respect all national and international laws and regulations that are applicable to them, particularly in regard to :

⚡ Respect for human and labor rights, health and safety, environmental protection and business ethics.



2.

HUMAN RIGHTS AND LABOR CODE

HAFFNER ENERGY's suppliers undertake to comply with the conventions of the ILO (International Labor Organization) and the Universal Declaration of Human Rights relating to :

- ⚡ The fundamental rights of workers, prohibiting the use of forced labor and child labor,
- ⚡ The prohibition of discrimination against employees on any grounds whatsoever - gender, origin, religion, sexual orientation, ethnicity, religion, disability, race, etc.
- ⚡ Suppliers also undertake not to be complicit in human rights violations and not to cause or allow a climate of harassment of their employees.
- ⚡ Suppliers undertake to offer decent working conditions and to treat their employees with respect and dignity.

3.

HEALTH AND SAFETY

Suppliers commit to providing their employees with working conditions that comply with health and safety standards. Indeed, safety is of paramount importance and must be considered a priority.

For this reason, Suppliers must comply with Health and Safety laws and regulations, and ensure a high level of standards aimed at managing and training their employees on a regular basis in order to raise their awareness of this subject.

Suppliers must keep track of workplace accidents so that they can be investigated, the consequences drawn and all necessary measures taken to reduce their occurrence.



4.

ENVIRONMENT AND SUSTAINABILITY

As a player in the energy transition for 30 years, **HAFFNER ENERGY** is naturally aware of the need to respect and protect the environment.

At **HAFFNER ENERGY**, we advocate a set of strong values in line with respecting the environment and the planet. That's why **HAFFNER ENERGY** expects its Suppliers to take all necessary measures and make every effort in this direction.

Suppliers undertake to structure their activities so as to minimize their environmental impact as much as possible, and to comply with all laws and regulations to which they are subject.



5.

BUSINESS ETHICS

HAFFNER ENERGY has chosen to adhere to a high standard of business conduct and expects the same exemplarity from its Suppliers.

Suppliers are committed to fighting corruption. It is made very clear that no form of corruption will be tolerated.

Employees of Suppliers are formally forbidden, directly or indirectly, to engage in acts of corruption.

The following are formally prohibited:

◆ **Money laundering** : the act of concealing the true origin of money/goods of criminal origin so as to pass them off as legitimate).

◆ **Corruption of officials (public or private)**. It is strictly forbidden to give or receive a **bribe**. The payment of money to a public official in France or abroad is strictly forbidden. For example, paying a small sum in cash or giving a gift to a civil servant to facilitate administrative procedures is prohibited. tion are criminal offences under French law.

◆ **Excessive gifts and invitations** given or received. It is common practice to offer gifts or invitations to meals on a commercial basis, the aim being to maintain good business relations. Such gifts or invitations must remain reasonable. For example, an invitation to a business lunch costing no more than 50 euros per person is considered reasonable. In contrast, cash gifts of any amount are strictly forbidden. A declaration register has been set up on our intranet so that all employees can declare gifts and invitations exceeding 50 euros.

◆ **Influence peddling**. Influence peddling is the practice of using one's position or influence, real or assumed, to influence a decision to be taken by a third party.

CONCLUSION

HAFFNER ENERGY reserves the right to verify the rules set forth in this Supplier Code of Conduct, either by one of its own employees or by an external auditor. To this end, Suppliers undertake to provide the information required for such an assessment.

HAFFNER ENERGY reserves the right to terminate business relations with Suppliers who fail to comply with the principles set out in this Code.



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