



Supplier Code of Conduct Formsheet

PUR-SUP-FE_834e_Supplier_Code_of_Conduct_v1.0

Classification C0

Date: 04/2020

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Preamble

ALLEN Technology (hereafter ALLEN)'s positioning and international exposure in the Engineering and Technology Consulting market give it a responsibility towards all its stakeholders. For several years now, the Group has placed Ethics and Sustainable Development at the heart of its strategy.

All employees must adhere to and respect the Group's values: development of human values, engineering culture, and the pursuit of profitable and sustainable growth.

The strategic axes of ALLEN's Sustainable Development approach have been structured in line with these values and organised around the following three pillars:

- A career accelerating employer;
- An innovation stimulator;
- A responsible partner.

ALLEN is also committed to promoting this strategy throughout its sphere of activity at influence. Through this Code of Conduct, ALLEN invites all its suppliers and partners to join in this process and act alongside it with a view to continuous improvement.

This charter is in no way intended to conflict with or modify the terms and conditions of any existing contract. Unless otherwise stated in such contract, in the event of a conflict, suppliers shall adhere to the contract terms.

ALLEN COMMITMENTS TO ITS SUPPLIERS

ALLEN is committed to respecting the ten principles of the United Nations Global Compact, the United Nations Universal Declaration of Human Rights, the fundamental conventions of the International Labour Organisation and the OECD Guidelines for Multinational Enterprises. ALLEN aims to work with the best suppliers on the market, allowing high quality services and controlled costs while offering innovative solutions. In its referencing and commercial relations with its suppliers and subcontractors, ALLEN is committed to respecting a guiding principle based on partnership, ethics, loyalty and integrity. The ALLEN group's purchasing policy and practices ensure the fundamental principles of fair treatment, independence, the fight against malpractice, transparency in its choices and decisions, and mutual continuous improvement in the common interest. ALLEN is committed to acting in compliance with the regulations in force, and to promote these values and principles to all its employees.

SUPPLIERS' OBLIGATIONS

By signing this Charter, the suppliers of the ALLEN group undertake to comply with the provisions of the Global Compact and the International Labour Organisation, as well as with national and international regulations in force. They undertake to implement the necessary means to ensure compliance with the principles set out in this Charter.

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Compliance with Laws

Suppliers shall comply with all applicable laws and regulations of the countries in which operations are managed or services provided

Human Rights

Suppliers shall undertake to respect and promote international human rights guidelines. In particular, they will ensure that they are not complicit in violations of these fundamental rights.

Human trafficking

Suppliers must adhere to regulations prohibiting human trafficking, and comply with all applicable local laws in the country or countries in which they operate. Suppliers must refrain from violating the rights of others and address any adverse human rights impacts of their operations.

Child labour

Suppliers will contribute to the effective abolition of child labour. They undertake to respect the legal age limit for employment définie in the country, and, whatever this legislation, never employ children under 15 years of age.

Forced and compulsory labour

Suppliers shall ensure the elimination of forced or compulsory labour. All work must be voluntary and workers must be free to leave their work or to hire them with reasonable cause.

Remuneration

Suppliers will comply with national regulations concerning the minimum wage and the principle of equal remuneration.

Environment, Health and safety

Suppliers will ensure the quality of life at work for their employees, contractors, visitors and others who may be affected by their activities by providing them with an environment that complies with local and international occupational health and safety standards.

Suppliers will comply with all applicable environmental laws and regulations. Suppliers are expected to establish an appropriate management system for Environment, Health and Safety. They commit to apply the precautionary approach to environmental problems. Suppliers are further expected to operate in a manner that actively manages risk, conserves natural resources and protects the environment in the communities within which they operate. They shall endeavour to reduce their direct and indirect

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environmental footprint, in particular by developing initiatives to promote greater environmental responsibility, through eco-design or the development and dissemination of environmentally friendly technologies.

Discriminations and Harassment

Suppliers will fight against all forms of discrimination, particularly on the grounds of gender, origin, religion, disability or political affiliation, and will undertake to promote cultural diversity.

Suppliers are expected to ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.

Freedom of association, collective bargaining and social dialogue

The suppliers of the ALLEN group will undertake to respect the right of workers to associate freely and to recognise the right to collective bargaining.

Suppliers are expected to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. Suppliers are also expected to recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing.

Anti-corruption measures

Suppliers will undertake to take action against corruption in all its forms, including extortion and bribery. They will not offer, directly or indirectly, any advantage, pecuniary or otherwise, to the Group's buyers. Invitations and gifts shall remain within acceptable limits, both in terms of usage and anti-corruption legislation, and shall never create obligations of the recipient to the giver.

Gifts/Business Courtesies

Suppliers are expected to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organisation, and are consistent with reasonable marketplace customs and practices.

Illegal Payments

Suppliers must not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives or others. The receipt, payment, and/or promise of sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such activity may not violate local law.

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Fraud and Deception

Suppliers must not seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so. This includes defrauding or stealing from the company, a customer or any third party, and any kind of misappropriation of property.

Competition and Anti-Trust

Suppliers must not fix prices or rig bids with their competitors. They must not exchange current, recent, or future pricing information with competitors. Suppliers must refrain from participating in a cartel.

Insider Trading

Suppliers and their personnel must not use any material or nonpublicly disclosed information obtained in the course of their business relationship with ALLEN as the basis for trading or for enabling others to trade in the stock or securities of any company.

Conflict of Interest

Suppliers are expected to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Suppliers are expected to provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of ALLEN and personal interests or those of close relatives, friends or associates.

Maintain Accurate Records

Suppliers are expected to create accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.

Confidential/Proprietary Information

Suppliers shall properly handle sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose (e.g. advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorisation from the owner of the information.

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Intellectual Property

Suppliers must comply with all the applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

Information Security

Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorised access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures. Suppliers must comply with applicable data privacy laws.

Import

Suppliers must ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import of parts, components, and technical data.

Export

Suppliers must ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the export of parts, components, and technical data. Suppliers shall provide truthful and accurate information and obtain export licences and/or consents where necessary.

Counterfeit Parts and product safety

Suppliers are expected to develop, implement, and maintain effective methods and processes appropriate to their products to minimise the risk of introducing counterfeit parts and materials into deliverable products. In addition, suppliers shall provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

No safety accident is ever acceptable – that’s why the top ALLEN priority is to continually improve the safety, discussing all safety topics at their appropriate level, which includes ALLEN’s senior executives.

Suppliers are also expected to consider their impacts on product safety in their whole internal processes, not only in the design of their products and/or services, but also in testing, production, maintenance. The suppliers are expected to align their safety plans with according standards (such as EASA’s European Plan for Aviation Safety among others).

Suppliers must commit with their own suppliers to reinforce risk identification and reporting, and share these to ALLEN if requested.

The sharing of safety information and documentation is essential to continue improving safety and preventing accidents. Suppliers shall promote and share best practices such as lessons learnt and cooperate to find new ways of improving safety internal standards.

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In case of any incident, the suppliers shall show transparency and collaborate to propose pragmatic solutions to solve identified safety issues.

Whistleblower Protection

Suppliers are expected to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. Suppliers are also expected to take action to prevent, detect, and correct any retaliatory actions.

Consequences for violating the Code

In the event that the expectations of this Code are not met, the business relationship may be reviewed and corrective action pursued subject to the terms of the related procurement contract(s.)

Ethics Policies

Commensurate with the size and nature of their business, suppliers are expected to establish management systems to support compliance with laws and regulations, as well as the expectations expressed within this Supplier Code of Conduct. Suppliers are encouraged to implement their own written code of conduct and to flow down their principles to the entities that furnish them with goods and services. ALLEN expects its suppliers to maintain effective programmes to encourage their employees to make ethical, values driven choices in their business dealings - beyond compliance with laws, regulations and contract requirements.

CONTINUOUS IMPROVEMENT

This Code of Conduct is an integral part of the Purchasing Terms and Conditions and applies to all suppliers of ALLEN. The Group wishes to promote social and environmental clauses and asks its suppliers to present their Corporate Social Responsibility actions and to promote them as competitive advantages.

Suppliers undertake to implement all necessary means to comply with the principles set out and to relay these provisions to their own suppliers, including in countries that are not signatories to the International Labour Organisation conventions where they may be required to work.

ALLEN reserves the right to carry out audits. In the event that any practice inconsistent with the principles set out in this Charter is detected, ALLEN reserves the right to ask the service provider to take corrective action or to put fin without notice to any business relationship.