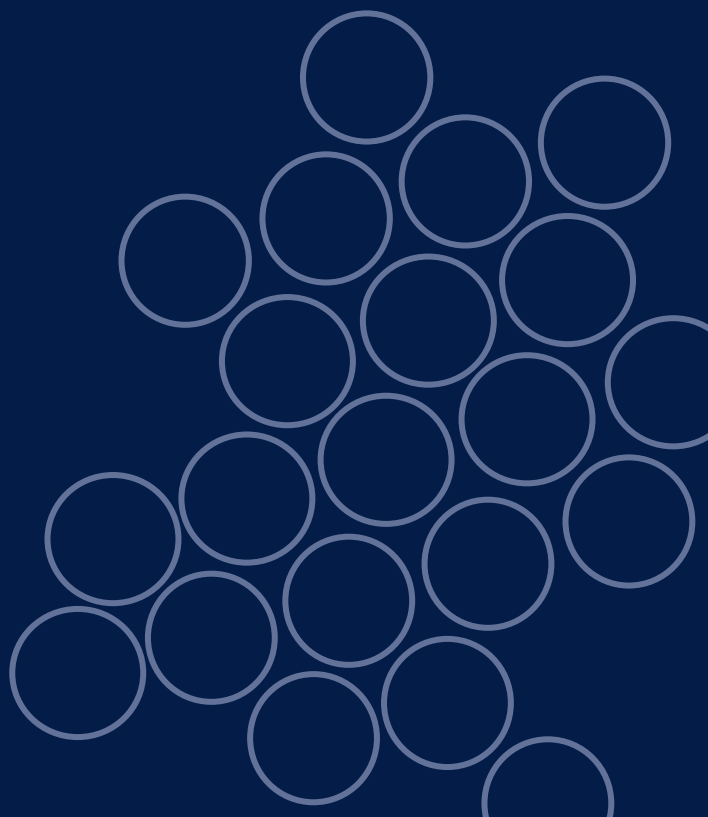


RESPONSIBLE PURCHASING CHARTER RONDOT GROUP



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TABLE OF CONTENTS

I. COMPANY PRESENTATION	4
II. OUR CHARTER FOR RESPONSIBLE & SUSTAINABLE PURCHASING	6
III. SUPPLIER'S COMMITMENTS	7
III.1 COMPLIANCE WITH LAWS, REGULATIONS AND STANDARDS	7
IV. ACT WITH INTEGRITY AND ETHICS	7
V. CONDUCT RESPONSIBLE EMPLOYMENT PRACTICES	8
V.1 FUNDAMENTAL RIGHTS AND FIGHT AGAINST DISCRIMINATION	8
VI. ACT IN FAVOR OF ENVIRONMENTAL PRACTICES	9
VI.1 CONTROLS AND AUDITS OF COMMITMENTS	10
VI.2 BREACHES OF COMMITMENTS	11

RONDOT GROUP RESPONSIBLE PURCHASING CHARTER

I. COMPANY PRESENTATION

Rondot Group is a renowned company in the glass industry, founded in 1936 by the Rondot family.

Based in Champagne au Mont d'Or, near Lyon in France, the company initially began producing consumables for the Lyon silk textile industry. However, in the 1970s, Rondot Group made a major strategic shift towards the glass industry, which today represents 95% of its activities.

We partner with leaders in the glass industry, sharing our knowledge to design the best solutions. We also market our products directly to glass industry professionals through our own sales network.

We firmly believe that our partners have a key role to play in achieving our various sustainable development objectives.

Supporting our suppliers in this process is one of our objectives, so we can involve them in this transformation and build lasting and fair relationships together.

Today, we are present in more than 600 glassworks. Our shared core values are **transparency, responsibility, respect, exemplarity, agility, trust** and the culture of sustainable performance. These values are the basis of our mission.

Today Rondot Group wishes to take on a new challenge by integrating CSR solutions and actions into its expertise in structured way across each entity of the group in order to offer all its stakeholders solutions in line with tomorrow's challenges.

This charter demonstrates our desire to integrate a CSR strategy throughout its entire value chain.

CEO

Raphael CONSTANTIN



RONDOT GROUP
SAS au capital de 31.400.000 €
9, rue Jean-Elysée Dupuy
69410 Champagne au Mont d'Or France
RCS LYON 879 104 396

II. OUR RESPONSIBLE & SUSTAINABLE PURCHASING CHARTER

Sustainable development, corporate social responsibility (CSR) and ethics are among the founding values of Rondot Group's businesses.

We are committed to these values on a daily basis, and they need to be shared with all of our Suppliers and Partners.

Thus, our Responsible and Sustainable Purchasing Charter aims to clarify our expectations of our partners and suppliers and to specify our commitments throughout the purchasing and supply chain.

This Charter is a long-term commitment.

It aims to integrate CSR and ethics into the selection criteria, alongside quality, service, cost, innovation and risk management.

It demonstrates the approach we wish to take with our suppliers and partners to ensure that our relationships are both sustainable, profitable and responsible.

We rely on our suppliers, our partners, as well as our teams, to apply it on a daily basis.

Each Purchasing department, and any employee in contact with our suppliers must read this charter.

This charter is an opportunity for the company to formalize with its suppliers, its commitment to a new approach, by integrating the 3 pillars that make up sustainable development (environment / social / economic), in the same way as our Ethics charter where we expect from our stakeholders a relationship of trust, loyalty and transparency.

Rondot Group builds a corporate culture based on trust, honesty, transparency and responsibility; its values and principles are notably reflected in its Code of Conduct Ethics and anti-corruption policy.

All group entities must respect and apply these values and principles.

The code of conduct ethics and the anti-corruption policy will soon be available on the Rondotgroup.com website, as well as on the websites of each subsidiary.

III. THE SUPPLIER'S COMMITMENTS

III.1 COMPLIANCE WITH LAWS, REGULATIONS AND STANDARDS

The Supplier will comply with all applicable laws, regulations and international standards relating to human rights, competition, personal data protection, the fight against corruption and fraud, and environmental protection.

The Supplier also agrees to respect:

- The United Nations Universal Declaration of Human Rights (1948) and its two complementary covenants (the International Covenant on Economic, Social, and Cultural Rights and the International Covenant on Civil and Political Rights).
- The Fundamental Conventions of the International Labor Organization (ILO), notably Convention C138 and the ILO Declaration on Fundamental Principles and Rights at Work.
- The United Nations Global Compact.
- The Athens Ethical Principles adopted on January 23, 2006.
- The General Data Protection Regulation (EU 2016/679).
- The French "Sapin II" law (Law No. 2016-1691) of December 9, 2016.
- The French Duty of Vigilance Law No. 2017-399 of March 27, 2017.

IV. ACT WITH INTEGRITY AND ETHICS

The Supplier will conduct its activities in accordance with the principles of loyalty, integrity and fairness. Thus, the Supplier is prohibited from:

- Practicing any act of corruption, in particular refraining from demanding, offering, promising or granting any advantage to Rondot Group employees or to third parties close to them with the aim of obtaining a contract or another advantage in commercial relations.

- Take advantage of a conflict of interest situation due to personal relationships with members of Rondot Group or take advantage of a conflict of interest situation in the context of its commercial activities.
- To engage in anti-competitive behavior.
- Participate in money laundering operations.
- As such, the Supplier particularly undertakes, if subject to it, to respect and implement the requirements of Law No. 2016-1691 of December 9, 2016 relating to transparency, the fight against corruption and to the modernization of economic life, known as “Sapin II”.
- The Supplier will respect and ensure respect for the principles of the group's Code of Ethics and anti-corruption policy: these documents will soon be freely available for consultation on the Rondot Group website and the websites of each subsidiary.

V. RESPONSIBLE EMPLOYMENT PRACTICES

V.1 FUNDAMENTAL RIGHTS AND FIGHT AGAINST DISCRIMINATION

The Supplier's employment practices with respect to its employees will comply with the laws, regulations and standards applicable to it. To this end, the Supplier will:

- Take all measures to ensure the health and safety of all its employees.
- Prohibit itself from practicing human trafficking or participating in any operation that could be qualified as such.
- Prohibit itself from using any form of forced or compulsory labor.
- Prohibit itself from deriving, directly or indirectly, any benefit from any form of slavery.
- Not employ child labor under the age **of 15**, or the minimum age set out in local regulations, whichever is higher.

- Comply with current laws on wages and working hours. In particular, it guarantees compliance with the minimum wage, overtime pay, and maximum working hours.
- Undertakes to prohibit any form of discrimination and to make no distinction, in particular on the grounds of alleged race, color, religious belief, sex, sexual orientation, social status, physical or mental disability; except when local regulations require compliance with “positive discrimination” standards. In this case, the Supplier informs Rondot Group of the relevant rules and how it complies with them.
- Prohibit any form of physical or psychological violence.
- Will not tolerate any form of sexual harassment and will put in place measures to support victims of this type of harassment.
- Will protect employee personal data and use it appropriately.

VI. ACT IN FAVOR OF ENVIRONMENTAL PRACTICES

The Supplier must manage its activities in an ecologically rational manner and must in particular implement concrete measures aimed at controlling their energy as best as possible such as:

- Reduce the consumption of water, energy, natural resources and other raw materials necessary for its activities in order to rationalize its consumption.
- Reduce the intensity of materials consumed while increasing their economic efficiency, and even to develop their rate of reuse and/or recycling wherever possible.
- Reduce and/or treat its emissions into the air, its effluents to land and/or water and waste of all kinds resulting from its activities.

The Supplier undertakes to respect the sectoral standards which apply to its activities, taking into account the products or services it provides to each entity of the Rondot Group.

At the request of the entity concerned, the supplier may be able to communicate these standards in writing to the subsidiary.

VI.1 CONTROLS AND AUDITS OF COMMITMENTS

In order to demonstrate compliance with the commitments made, the Supplier must:

- Communicate the Charter to all its staff involved in business relations with Rondot Group, failing which it will provide its staff with adequate information for the implementation of the principles laid down by this Charter in the language of the country in which it operates.
- At the request of the Rondot Group or one of its subsidiaries, the Supplier will provide it with a copy.
- Identify and implement relevant measures to prevent serious violations of human rights and fundamental freedoms, the health and safety as well as the environment resulting from its activities, those of the companies under its controls, and those of its subcontractors or suppliers.
- Ensure that its suppliers and subcontractors (the “Second Tier Suppliers”), regardless of the country where they operate, are subject to commitments at least equivalent to those it makes under the Charter
- Ensure that its second-tier Supplier comply with these commitments.
- Provide in writing to the subsidiary of the group concerned, as soon as possible, all the certificates and documents required by the laws and regulations (hereinafter “The Document(s)”) applicable to the Supplier in matters of social, environmental and labor law.
- Provide answers to the evaluation/audit questionnaires sent by the Group entity or its subsidiary, and any evidence required to demonstrate them: any unjustified response may be considered as a point of failure in the commitments made.

In order to demonstrate compliance with the commitments made, the Supplier undertakes to:

- For the purposes of monitoring compliance with the commitments made, the Supplier authorizes Rondot Group or any entity of the group to carry out any audit, on site or off-site, at its own expense, by its own means or by using a third party, after giving the Supplier with 15 (fifteen) calendar days' notice.
- Audit compliance with employment practices, no prior notice is required. The Supplier undertakes to provide reasonable assistance and act diligently for the purpose of such audit.
- Ensures good cooperation and coordination, where applicable, with second-tier Service Providers. The costs incurred by the Supplier in this context remain its responsibility. The concerned company will directly benefit from the same rights against the second-tier service providers as those granted to it in relation to the Supplier.
- Will inform, as soon as it becomes aware of it, of any incident, contrary behavior or serious violation of the principles of the Charter either directly in writing to the parent company or to the subsidiary by email.
- Undertake all appropriate and immediate measures to stop any such breaches, and will inform Rondot Group or one of its entities in writing...

VI.2 BREACH OF COMMITMENTS

Risks of supplier denunciation

In the event of denunciation of the Charter by the Supplier or a breach of the stated commitments by Rondot Group or by one of its entities, the latter may, as of right and without prejudice to potential damages, take the following actions:

- Implement the necessary corrective measures within a defined time frame.
- Must not use any of the Group's brands or names, even as a reference without written consent.
- And /or - Terminate all or part of the business relationship with the Supplier.

Signature and Supplier Identification

Company Name

Name of representative:

Representative title:

Date :

Signature and company stamp:

CEO

Raphael CONSTANTIN



Responsable RSE

Isabel COMOY



RESPONSIBLE PURCHASING CHARTER RONDOT GROUP

