



SUPPLIER  
AND SUBCONTRACTOR  
**CODE OF CONDUCT**

# INTRODUCTION

Amarenco Group is an international renewable energy provider, answering the need for cleaner energy whilst being more respectful of ecosystems and of people. We are aware that a new reality is necessary to ensure future prosperity for all and we want to be an actor of change towards this world 2.0 and further.

At Amarenco Group, we're committed to being a good corporate citizen in all our dealings with colleagues, suppliers and in the communities where we work. To ensure a consistent approach throughout our supply chain, we expect our suppliers to have or adopt similar business principles to our own. The scope of the Code includes our suppliers, subcontractors, service providers, brokers and any third party that would be working on behalf of Amarenco Group. Therefore, when suppliers and subcontractors are mentioned throughout the Code of Conduct, it refers to all the parties mentioned above. Any partner, supplier and subcontractor measuring its Environmental, Social and Governance (ESG) impacts, implementing improvement practices and reporting ESG results, and actions will have a vantage point when doing business with Amarenco Group and our sister companies.

Our mission is to help our clients achieve carbon neutrality, increase their economic competitiveness, and create additional sources of value for themselves and their local communities while achieving the regeneration of the ecosystem earth. Furthermore, Amarenco Group is supporting the sustainable development goals of the United Nations, and principally advocate five values - Human Ecology, Engagement, Agility, Trailblazer and Unity. Amarenco Group's guiding principles apply to all of our employees. They provide the foundation for our operations globally. Our suppliers and subcontractors also have to enlists their partners in upholding these same principles. We believe this joint commitment to ethical conduct and integrity is a strong foundation for trusted business relationships that create shared value.

Above all, we expect the organisations we collaborate with to be able to demonstrate compliance with all French, EU and international legislation that applies to their business operations from Modern Slavery, Anti-Bribery and Health & Safety laws to product-specific regulations. Furthermore, by agreeing with this Code, you also commit to respect to conform to the following international rules:

- > [Universal Declaration of Human Rights](#)
- > [The key conventions of the ILO](#)
- > [United Nations Guiding Principles on Business and Human Rights](#)

It is your responsibility to make sure that all relevant staff within your organisation, and any sub-contractors or other third parties that work for us on your behalf, are aware of all the requirements set out in our Supplier and Subcontractor Code of Conduct and are adhering to them. Furthermore, if subcontractors hire subcontractors themselves whilst working on behalf of Amarenco, this code must apply to them. When working for Amarenco Group, you must get the approval of Amarenco Group to work with subcontractors, and third parties must send us the Code of Conduct signed. If you have any questions about our Code, please speak to your point of contact at Amarenco Group.

### Compliance with the Supplier and Subcontractor Code of Conduct

Suppliers and subcontractors should carefully review the Supplier and Subcontractor Code. Suppliers and subcontractors are responsible for ensuring that they comply with Amarenco Group's standards of conduct. You must never act in any way that undermines compliance with the Code.

We reserve the right to check adherence to these principles and to conduct compliance audits at any time without notice. Suppliers and subcontractors shall supply the necessary information, original and accurate files, and grant access to Amarenco representatives who seek to verify compliance with the requirements of this Code.

They shall agree to improve and correct any deficiency discovered.

# 1 SOCIAL RESPONSIBILITY

AMARENCO GROUP IS COMMITTED TO PROMOTING POSITIVE WORKING CONDITIONS AND PRACTICES THROUGHOUT OUR SUPPLY CHAIN – AND WE WANT TO WORK WITH RESPONSIBLE PROVIDERS WHO SHARE OUR VALUES. WE AIM TO WORK COLLABORATIVELY; AND TO CREATE AN ENVIRONMENT THAT ENABLES TRANSPARENCY THROUGHOUT THE SUPPLY CHAIN. WE VALUE RESPECT AND MUTUAL TRUST INSIDE THE COMPANY AND IN THE RELATIONSHIPS WITH OUR SUBCONTRACTORS AND SUPPLIERS.

As a subcontractor or supplier of Amarenco Group or one of our SPVs or sister companies, you must set up an action plan to address the following points and ensure to:

- > Maintain a work environment free from prejudice, violence, and harassment inside your own organisation.
- > Prevent discrimination of any sort at all levels of your company and ensure that none of your employees are subject to any discrimination in any aspect of their employment relationship including recruitment, hiring, and onboarding, compensation, benefits, work assignments, access to training, advancement, discipline, termination or retirement.
- > Recognise the value of human beings.
- > Respect the international principles stated in the introduction of this section.

- > Ensure that the people working for you are treated with respect and that their health and safety, and basic human rights protected and promoted.
- > Not make deals or finance projects that could finance directly or indirectly terrorism of any kind.
- > Never use or tolerate the use of human trafficking, forced labour, or child labour as defined by the International Labour Organization (ILO): we do not tolerate any form of child labour. No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher.
- > Pay your employees fairly, respect the local policies on salaries, and pay your employees the legal minimum wage for them to support themselves and satisfy their basic needs.
- > Ensure that your employees' working hours and overtime do not go over legal working hours limits. If there are no such limits, we recommend that your employees do not work more than sixty hours per week including overtime.
- > Ensure that your employees get at least one full day off per week.
- > If you become aware of any actual or suspected slavery, forced labour or human trafficking in their supply chain in respect of any products or service, you are required to correct it and communicate it immediately to the email address [listen@amarencogroup.com](mailto:listen@amarencogroup.com), the relevant project manager or Amarenco Group Chief Project Execution Officer immediately. Amarenco Group will immediately disavow and stop working with any organisation that does not correct such practices, perpetuates them, or supports them.

## 2 ENVIRONMENTAL RESPONSIBILITY

AMARENCO GROUP EXPECTS ITS SUPPLIERS AND SUBCONTRACTORS TO DEMONSTRATE A CLEAR UNDERSTANDING OF THE ENVIRONMENTAL RISKS, IMPACTS AND RESPONSIBILITIES ASSOCIATED WITH THE PRODUCTS AND SERVICES THEY PROVIDE. AMARENCO GROUP IS COMMITTED TO MAKING POSITIVE CHOICES IN OUR SUPPLY CHAIN THAT WILL REDUCE OUR IMPACT ON THE GLOBAL ENVIRONMENT. WE UNDERSTAND THE NATURE AND SCALE OF OUR IMPACT AND THE IMPORTANCE OF WORKING WITH OUR SUPPLY CHAIN PARTNERS TO REDUCE IT.

**As a subcontractor or supplier of Amarenco Group or one of our SPVs or sister companies, you must set up an action plan to address the following points and ensure to:**

- > Ensure that your decisions and actions don't have a negative effect on human development and environmental biodiversity. We encourage you to share with us any idea and improvement that can improve social and environmental impacts of our activity. We encourage you to share with us any idea on how to improve the social and environmental impacts of our activity.
- > Be a steward of the human and natural environment of our sites, if your intervention takes place in a site operated by Amarenco Group or one of our SPVs or Sister Companies.
- > Reduce waste by working towards making your products and packaging as recyclable as possible and/or by properly managing all waste generated by your work.

- > Seek to improve the potential impacts of your activities on carbon emissions and biodiversity.
- > Seek the most suitable solution at the local level.
- > Seek to bring value to the local communities of the sites where you operate.
- > Minimise the use of energy and fuel throughout your operations and source renewable energy and use renewable technologies wherever possible, supporting the global drive to achieve net zero carbon.

## 3 SAFETY, HEALTH AND QUALITY

**AMARENCO GROUP RECOGNISES THAT INTEGRATING SOUND HEALTH AND SAFETY MANAGEMENT PRACTICES INTO ALL ASPECTS OF BUSINESS IS ESSENTIAL.**

**SUPPLIERS AND SUBCONTRACTORS SHALL COMMIT TO CREATE SAFE WORKING CONDITION AND A HEALTHY WORK ENVIRONMENT FOR ALL OF THEIR EMPLOYEES. AMARENCO GROUP AIMS TO ONLY SOURCE SAFE PRODUCTS THAT ARE FIT FOR PURPOSE AND WHICH MEET OR EXCEED OUR EXPECTATIONS. WE REQUIRE EACH PRODUCT THAT ENTERS OUR SUPPLY CHAIN TO COMPLY WITH ALL APPLICABLE LEGISLATION.**

**As a subcontractor or supplier of Amarenco Group or one of our SPVs or sister companies, you must set up an action plan to address the following points and ensure to:**

- > Maintain a safe and healthy work environment.
- > Take protective safety and security measures against threats to individuals.
- > Identify, evaluate, and control workers that are exposed to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing and highly repetitive or forceful assembly tasks.
- > Compensate workers if they injure themselves or damage their health whilst working for you.
- > Ensure both good physical and mental health in your organisation.
- > Provide clean and safe facilities including clean toilet facilities, access to potable water and sanitary food preparation and storage facilities.
- > Provide a shelter when employees work outside, protecting them from excessive cold or heat.
- > Only supply products that are suitable for our supply chain and that are safe to handle and store.
- > Only supply products that are fit for purpose and meet our quality requirements.

# 4 ETHICAL BEHAVIOURS

THE HIGHEST STANDARD OF INTEGRITY IS EXPECTED IN ALL OUR BUSINESS DEALINGS. ALL FORMS OF CORRUPTION, FRAUD, EXTORTION, BRIBERY (INCLUDING FACILITATION PAYMENTS), AND EMBEZZLEMENT AS WELL AS LAW CONTRAVENING ARE STRICTLY PROHIBITED AND WILL RESULT IN IMMEDIATE CONTRACT TERMINATION WITH AMARENCO GROUP AND OUR SISTER COMPANIES. THESE TERMS APPLY TO OUR SUPPLIERS, THE SUPPLIERS OF OUR SUPPLIERS AND SUBCONTRACTORS.

As a subcontractor or supplier of Amarenco Group or one of our SPVs or sister companies, you must set up an action plan to address the following points and ensure to :

- Oppose to all forms of money laundering, comply with all applicable anti-money laundering laws, and take steps to prevent our financial transactions from being used by others to launder money. Before entering into a commercial agreement, you shall ensure that the organisation is legally established and conducting a law-abiding business.
- Commit to act professionally, fairly and with integrity in your business dealings and implement and enforce effective systems to counter bribery.
- Not offer or provide money or anything of value to any person if the circumstances indicate that it is probable that all or part of the money or other thing of value is being given to another individual or entity to influence official action or to obtain a business advantage.
- Never offer gifts or entertainment to Amarenco Group personnel or representatives under circumstances that create the appearance of impropriety.
- Never accept or give a bribe, facilitation payment, kickback, or other improper payment for any reason. Please refer to our anti-corruption and bribery policy.
- Comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods and services (including software and technology).
- Avoid activities that may give rise to a violation of the anti-trust laws.
- Protect and promote Amarenco Group's assets, avoid harming them, and ensure that they are not used fraudulently. Furthermore, you are bound to help protecting and preserving Amarenco Group's assets against all forms of deterioration, damage, theft, and/or misappropriation. You must not use Amarenco Group's assets for personal reasons.
- Must use the assets of the Group's entities only for professional purposes, in legitimate conditions and with the legitimate authorisations.
- Alert Amarenco Group if you notice that protection measures are insufficient. The same applies if you become aware of any theft, attempted theft, piracy, espionage, sabotage, and/or damage.
- Have in place internal juridical rules which must be obeyed by all employees (in particular, the Binding Corporate Rules validated by European data protection authorities) for the protection and transfer of personal data.