



CLAYENS



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RESPONSIBLE PROCUREMENT POLICY

Version 4 : June 2025

Version 3 : Mars 2023

Version 2 : Jan 2022

Version 1 : Juin 2020



Genas, June, 2025

The CLAYENS group is committed to controlling the environmental, social and economic impact by the application of good governance practices in the activities of all its purchases. This policy applies to all employees at the CLAYENS Group sites worldwide.

The materiality analysis has led us to define the strategic plan for the years 2025, 2026 and 2027, based on the following:

1- Developing the economic performance of the group and its subsidiaries by creating value and ensuring the availability of products, while maintaining productivity initiatives.

2- Controlling the supply chain by selecting and monitoring our suppliers in accordance with an ethical and responsible Purchase approach.

3- Optimising and supporting our strategic supplier panel to achieve CSR, quality and logistics objectives by 2027:

- 100% of strategic suppliers committed to the Code of conduct & Sustainable Development Charter and 90% signing CLAYENS General Purchasing Quality Requirements.
- 100% of strategic suppliers certified ISO14001 or who have initiated an environmental approach.
- Continuously reducing the number of claims and PPM, achieving a 95% service rate on the panel of strategic suppliers.

4- Raising the awareness of employees and suppliers to sustainable development and the company's code of conduct in terms of responsible purchasing by 2027.


- *Training 100% of buyers in Responsible Purchasing and anti-corruption issues.*
- *Evaluating 100% of strategic suppliers on the CSR awareness module CLAYENS.*
- *Sensitizing 100% of strategic suppliers on the on conflict minerals.*

5- Cultivate responsible, ethical, and collaborative supplier relationships, incorporating dependency management, environmental and social impacts, while ensuring professional oversight and smooth communication within the company.

We implement the means to be exemplary in terms of loyalty regarding the integrity , diversity and fair treatment practices of our suppliers, in particular with clear and factual selection criteria:

- *We support the value of advancing diversity and inclusion within the supply chain and promoting both visible and invisible diversity through minority-owned businesses. CLAYENS also recognizes and supports women-owned businesses.*

- *We implement programs that value the inclusion of minorities to enhance their growth and prosperity.*

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- We promote access to our tenders as much as possible for local service providers of all sizes, including companies in the protected and professional integration sector.
 - We select our strategic and non-strategic suppliers by incorporating CSR criteria and adherence to the CLAYENS Responsible Purchasing Code of Conduct Charter, including compliance with international standards related to human rights.
 - We take CSR aspects into account in our market allocation matrix and in the selection of our strategic suppliers.
 - We monitor suppliers' commitment to our Code of Conduct & Responsible Purchasing Charter for Sustainable Development. We encourage our suppliers to implement measures to detect and eliminate all forms of counterfeiting in products and services.
 - We ensure the implementation of CSR requirements by suppliers through preliminary assessments and audit activities. We monitor the completion of conflict minerals surveillance by our suppliers to control the management of those (Gold, tin, tantalum, tungsten, and cobalt).
 - We promote as much as possible the development of technologies that respect the environment by our suppliers through their control of pollutants, GHG emissions and recycling.
 - We promote suppliers aiming to control their carbon footprint as well as their logistics strategies limiting environmental impacts.
 - We encourage our suppliers to adopt a responsible approach in compliance with both international and local labor laws, including strict adherence to international commitments regarding conflict minerals throughout their supply chain, and to provide proof upon our request. CLAYENS and its suppliers ensure that the importation of these minerals and metals comes exclusively from responsible sources and that they are not sourced from conflict zones.

The above objectives are to be achieved by 2027.

Diversity, Equity and Inclusion fuel the innovation, inspiration and ambition that help us create and lead the business forward.

We are committed to regularly reviewing our purchasing policy and associated performance. The policy will be reviewed at least once a year.

We shall communicate and promote our Responsible Procurement policy internally and externally :

- When integrating or updating a supplier in our panel via our general Purchasing quality requirements and sustainable development charter.
- When selecting a supplier for a contract through our specifications.
- We invite our suppliers to apply these same requirements to their partners and subcontractors.

The Procurement Department is responsible for defining and evaluating the overall effectiveness of our procurement management system and updating this policy annually. The General Management is committed to providing the necessary means to achieve the objectives set.

The operational application of the Group Procurement policy is the responsibility of the Procurement and Quality Department.

CEO
Eric PISANI



Group Purchasing Director
Alexandra TELEKI

