



Louis Dreyfus
ARMATEURS

SUPPLIERS CODE OF CONDUCT

LOUIS DREYFUS ARMATEURS

Louis Dreyfus
ARMATEURS

Contents

01.

Ethics

02.

People and Labor

03.

Health, Safety and Environment

04.

Quality



Foreword

Foreword by Edouard Louis-Dreyfus, President of the Louis Dreyfus Armateurs Group

For more than 165 years, the Louis Dreyfus Armateurs Group (“LDA”) has been a worldwide praised actor in maritime activities. This recognition is built on the persistent application of a policy constantly oriented towards listening to and satisfying customers and a proactive approach to safety, security and respect for the environment.

Within the scope of our activities, we are committed to promoting our core values, such as fairness, respect, safety and quality and we are determined to ensure the highest standards of responsibility throughout our operations, including our supply chain.

LDA expects all its suppliers and subcontractors to share the principles and guidelines expressed in this Supplier Code of Conduct. Moreover, our suppliers are expected to replicate these standards further down the supply chain.

This Supplier Code of Conduct is therefore made available to our suppliers with the goal of strengthening our business relationships as well as our mutual understanding of best practices in our day-to-day activities.

Ethics

Suppliers shall conduct their business in an ethical manner and act with integrity.

Business Integrity

Suppliers shall not practice or tolerate any form of corruption, extortion, embezzlement or money laundering. Suppliers shall not offer or accept bribes or other unlawful incentives (including 'facilitation payments') to or from their business partners or government officials. Suppliers shall not offer to LDA Group employees any kind of gifts or personal benefit which could be perceived as a bribe. In all cases, gifts or entertainment shall not be offered to improperly influence a business relationship and must not violate applicable laws or ethical standards. All gifts received will be reported to the LDA Compliance Desk.

Fair Competition

Suppliers will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

International Trade Controls

Suppliers must comply with export control regulations applicable to their business and provide accurate and truthful information about it to customs and other authorities when required.

Conflict of Interest

Suppliers shall disclose to LDA Group any situation that could constitute a conflict of interest, such as LDA Group employees having professional, private and/or significant financial advantages or interests in any of the supplier's businesses. Actions may be taken by LDA in case of reported conflict of interests.

Privacy & Intellectual Property

Suppliers shall safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.

Suppliers shall not use LDA Group's name or that of our affiliates in publicity or advertising

without LDA Group's prior written consent.

Data Privacy & Data Protection

Supplier information systems that contain LDA Group's confidential information or data shall be appropriately managed and protected against unauthorized access, use, disclosure, modification or destruction. Suppliers shall collect personal information only for legitimate business purposes, use it in a legal, transparent and secure manner, share it only with those who are allowed access, protect it in accordance with security policies, retain it only for as long as necessary, and obligate third parties with access to personal information to

Identification of Concerns

Suppliers shall encourage and provide means for their employees to report concerns, complaints or potentially unlawful activities in the workplace without threat of reprisal, intimidation or harassment. Any report should be treated in a confidential manner. Suppliers shall investigate such reports and take corrective action if needed.

Suppliers shall notify LDA Group of legal actions, administrative investigations or prosecutions that may affect their performance or that could potentially adversely affect a supplier's and LDA Group's reputation.

If at any time a supplier or one of its employees believes that a LDA Group employee has acted contrary to these principles, the supplier or its employee is encouraged to report its concerns to our Compliance Desk at Compliance@LDA.fr.

People and Labor

Suppliers shall protect the human rights of their employees and treat them with dignity and respect.

Child Labor avoidance

We do not tolerate child labor in our supply chain. Suppliers must avoid any sort of child labor in their business operations consistent with the International Labour Organization's (ILO) 2 core labor standards and the United Nations Global Compact principles (<https://www.unglobalcompact.org/what-is-gc/mission/principles>). If local minimum age law stipulates a higher age for work or mandatory schooling, the higher age applies.

Freely chosen employment

We do not tolerate slavery, servitude and forced or compulsory labor and human trafficking in our supply chain. Bonded, indentured or involuntary prison labor also is not accepted. Practices such as withholding personal property, passports, wages, training certificates, work or any other document for inappropriate reasons are not acceptable.

Freedom of Association

Suppliers shall commit to an open and constructive dialogue with their employees and workers' representatives. In accordance with local laws, suppliers must respect the rights of their employees to associate freely, form and join labor unions, seek representation, join works councils, and engage in collective bargaining. Suppliers shall not disadvantage employees who act as workers' representatives so that they can exercise their role without fear of reprisal or discrimination.



Working times, wages and benefits

Working time for suppliers' employees shall not exceed the maximum set by the applicable national law and by ILO standards. Compensation shall be paid to employees regularly, in a timely manner and in full according to applicable laws and must comply with applicable national wage laws. Compensation and benefits should aim at providing an adequate standard of living for employees and their families. Unless otherwise authorized by local laws and except for the entitlement of damages on a contractual or legal basis, deductions from basic wages as a disciplinary measure shall not be permitted. Suppliers are expected to provide their employees with fair and competitive compensation and benefits and to support equal pay for work of equal value. It is recommended that suppliers offer their employees ample training and educational opportunities.

Diversity and inclusion

Equal treatment of all employees must be a fundamental principle of the supplier's corporate policy. Typical discriminatory treatment takes into consideration – consciously or unconsciously – irrelevant characteristics of an employee such as age, disability, ethnicity, family status, gender, gender expression, gender identity, genetic information, national origin, physical characteristics, political affiliation, pregnancy, religion, social origin, sexual orientation, union membership or any unlawful criterion under applicable law. Suppliers shall ensure that their employees are not harassed in any way. LDA Group encourages suppliers to provide an inclusive and supportive working environment by exercising diversity when it comes to their employees.

Fair treatment

Suppliers must provide their employees with a workplace free of harsh and inhumane treatment, without any sexual harassment, sexual abuse, physical punishment or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment. Furthermore, suppliers are expected not to unfairly terminate any employment contract or without clear evidence that such employment termination is in relation to the working performance of an employee, as permitted by law. Employees may leave the employer freely provided they comply with advance notice specified by law. They shall be paid on time and in full for the work they have done prior to leaving according to applicable laws.

Health, Safety and Environment

Suppliers shall make adequate provision for the health and safety of their employees, customers, visitors, contractors, and others who may be affected by their activities. They shall operate in an environmentally responsible and resource-efficient manner.

Occupational health and safety

Suppliers shall adequately protect their employees against chemical, biological and physical hazards. Physically demanding tasks and conditions in the workplace as well as risks associated with infrastructures used must be adequately managed to protect their employees. Suppliers shall provide appropriate controls, safe work procedures, adequate maintenance and necessary technical protective measures to mitigate health and safety risks in the workplace and to prevent accidents and occupational illnesses. In addition, suppliers shall provide employees with appropriate personal protective equipment.

Safety information relating to any identified workplace risk or hazardous materials – including compounds in intermediate materials – shall be available to educate, train and protect workers from hazards. A safe and healthy working environment shall include as a minimum the provision of drinking water, adequate lighting, temperature, ventilation and sanitation and, if applicable, safe and healthy company living quarters.

Process safety

Suppliers shall have safety programs in place for managing and maintaining all their production processes in accordance with the applicable safety standards. Programs shall be appropriate to facility and process risks. Suppliers shall appropriately communicate, disclose and manage hazards inherent in their processes and products to ensure that affected or potentially affected third parties are protected. Likewise, major incidents shall be analyzed and communicated in a timely fashion. For hazardous installations and processes, the supplier shall regularly conduct specific risk assessments and implement measures that prevent the occurrence of incidents such as chemical releases, fires or explosions.

Product safety

Suppliers must comply with product safety regulations, label products properly and communicate product-handling requirements. They shall provide to relevant parties the applicable documentation containing all necessary safety-relevant information for all hazardous substances in case of a legitimate need. This includes product information, safety data sheets, notification or registration confirmations, uses and exposure scenarios. Suppliers pro-actively and transparently share information about the health, safety, and environmental aspects of their products with all relevant parties.

Emergency preparedness

Suppliers shall make available safety information on identified workplace risks to employees and contractors. They shall be correspondingly trained to ensure they are adequately protected at all times. Suppliers shall identify and assess relevant risks and emergency situations in the workplace, public neighborhood and company-provided living quarters. Their potential impact shall be minimized by implementing appropriate fire protection, effective emergency plans, regular drills and response procedures.

Waste and emissions

Suppliers shall ensure the safe and compliant handling, storage, transportation, disposal, recycling, reuse and management of waste, air emissions and wastewater discharges. Any activity that has the potential to adversely impact human or environmental health shall be appropriately managed, measured and controlled. The release of hazardous substances must be minimized. Special attention shall be given to active ingredients. Suppliers shall prevent or mitigate accidental spills and fugitive emissions of hazardous materials.

Resource conservation and climate protection

Suppliers shall use natural resources (e.g. water, sources of energy, raw materials) in a sound and sober way and preserve them. To ensure the conservation of renewable natural resources, suppliers shall promote the application of broadly recognized sustainability standards and certifications that have been developed by multiple stakeholders. Negative impacts on the environment and climate caused by the suppliers or in their supply chain shall be minimized or eliminated at their source.

Practices are encouraged to be in line with circular economy principles such as material reduction, substitution, collection, sharing, maintenance, reuse, redistribution, refurbishment, remanufacturing and recycling. Suppliers shall engage in the development and use of environmentally and climate-friendly products, processes and technologies.

Suppliers shall ensure and demonstrate continuous environmental improvements, including a reduction in raw materials, energy, emissions, discharges, noise, waste and reliance on natural resources and hazardous substances by means of clear targets and improvement policies.



04.

Quality

Suppliers shall provide high-quality, safe and effective goods and services that are in full compliance with applicable laws and regulations.

Quality requirements

Suppliers shall meet generally recognized quality standards or contractually agreed quality requirements and standards in order to provide goods and services that consistently meet LDA Group's and its customers' needs, perform as warranted and are safe for their intended use. Suppliers shall immediately address all critical issues that have the potential to negatively affect the quality of goods and services. Suppliers must inform LDA Group about changes in the manufacturing or supply process that have the potential to impact the specification of goods and services provided.



LouisDreyfus
ARMATEURS

www.lda.fr