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# Lyreco

WORKING TOGETHER  
FOR TOMORROW



# SUPPLIERS CODE OF ETHICS

MNG-010 · January 2022



# OUR COMMITMENTS

Since its creation in 1926, Lyreco has been driven by the values of **Excellence, Respect, Passion** and **Agility**. These values are shared by all our employees, are our strength, and make us a trusted partner. For us, respecting these values is a matter of course, an obligation, a duty.

The principles of Integrity, Neutrality, Fair Play, Equity and Compliance guide our conduct and decisions, at all times, with all our employees and partners, in all our activities and wherever we operate. These guiding principles are further reaffirmed in the Code of Ethics applicable in all Lyreco entities.

As part of this commitment, we would like to remind our suppliers in the Code of Ethics dedicated for them of the minimum requirements they must comply with in terms of ethics and professional behaviour when working with Lyreco.

We expect our suppliers to respect the same ethical requirements and conduct their activities in accordance with this Suppliers Code of Ethics, to implement the policies and procedures necessary to comply with applicable laws and regulations, and to ensure that these commitments are followed up with all their partners.

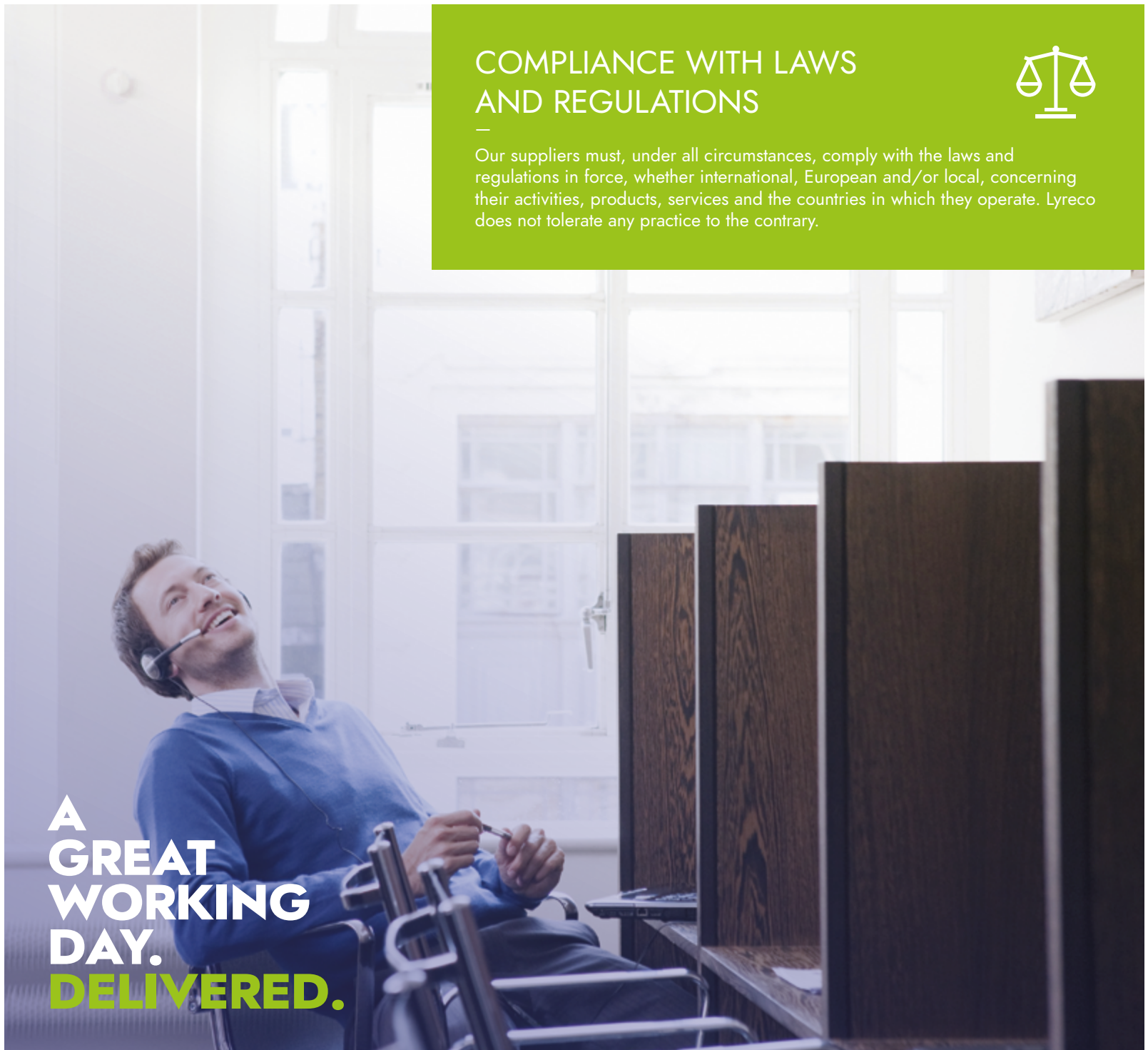
## PURPOSE OF THE SUPPLIERS CODE OF ETHICS

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The Suppliers Code of Ethics is the prerequisite for any collaboration with Lyreco. Compliance with it is one of Lyreco's evaluation and referencing criteria. It does not affect or modify, in any way whatsoever, the terms of any existing contracts.

Furthermore, it does not replace the laws and regulations in force in the various countries applicable to them. In the event of any contradiction between the applicable law and this Suppliers Code of Ethics, the most restrictive provision will apply.

We invite our suppliers to read it and ensure that it is fully respected. It is by sharing the same commitments that we can, together, advance ethics in business and guarantee «A Great Working Day» for all.



## COMPLIANCE WITH LAWS AND REGULATIONS

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Our suppliers must, under all circumstances, comply with the laws and regulations in force, whether international, European and/or local, concerning their activities, products, services and the countries in which they operate. Lyreco does not tolerate any practice to the contrary.

**A  
GREAT  
WORKING  
DAY.  
DELIVERED.**



## HUMAN RIGHTS

As a signatory of the United Nations Global Compact since 2004, Lyreco is committed to supporting human rights and promoting a socially responsible attitude, in line with the principles of the Global Compact, but also with the International Labour Organisation (ILO) Convention, the United Nations Convention on the Rights of the Child and the OECD Guidelines for Multinational Enterprises.

Our suppliers are also required to treat everyone with dignity and respect, promote diversity and equal opportunities, and build an ethical and inclusive culture. In particular, they must undertake to combat all forms of forced or compulsory labour, the use of child labour, discrimination in employment or occupation, and refrain from using partners who apply or encourage such practices.



## WORKING CONDITIONS

Our suppliers shall provide a working environment that complies with applicable legislation, is healthy and safe, free from any form of intimidation, harassment or discrimination, and promotes social dialogue.

### **Compliance with social laws and regulations**

Our suppliers are required to comply with the social laws and regulations applicable in each of the countries in which they operate, in particular with regard to maximum daily working hours, wages and benefits, minimum age and respect for privacy.

### **Health and safety at work**

Our suppliers are required to provide a safe and healthy working environment at all sites where they operate. This commitment must include the strictest compliance with the laws, regulations and standards in force with regard to health and safety at work, training and awareness-raising for all employees, and the implementation of all necessary measures to prevent and combat occupational accidents and diseases.

### **Harassment and discrimination**

Our suppliers must enable everyone to work in a dignified, respectful and professional manner, without fear of harassment or intimidation. They are also required to ensure equal access to employment, training and promotion without discrimination.

### **Social dialogue**

Suppliers are required to recognize and respect the right of workers to exercise their freedom of association, including the right to join or not join any trade union organization of their choice, and to bargain collectively.



## ENVIRONMENT AND SUSTAINABLE DEVELOPMENT

At Lyreco, it is the responsibility of all employees to take into account respect for the environment and sustainable development in their daily activities.

We are aware that taking action to protect our planet and reduce our environmental footprint requires the commitment of everyone.

This is why we make sure that we work with suppliers who, at a minimum, comply with the relevant laws and regulations wherever they operate, but above all, who share our concerns and commitment to ever more sustainable and responsible practices, products and solutions, and who offer innovation and continuous improvement programs.



## QUALITY OF PRODUCTS AND SERVICES

Lyreco rigorously ensures that all products and services offered to its customers meet the highest standards in terms of quality and safety.

We require our suppliers to share the same ambitions for excellent products and services, to strictly comply with applicable laws and regulations, to immediately report any issues regarding the quality and safety of their products and services and to implement all appropriate corrective, palliative or alternative measures in consultation with Lyreco.

For products containing animal-derived materials, suppliers shall not tolerate any cruelty or animal neglect. Suppliers will take into consideration the five animal freedoms, as defined by The World Organisation for Animal Health.



## BUSINESS INTEGRITY

**Our suppliers must act with integrity on a daily basis and take the necessary steps to eliminate contrary behaviour in order to build and maintain transparency and trust in their business relationships.**

### **Corruption and influence peddling**

Lyreco has adopted a zero-tolerance policy with regard to corruption and influence peddling and expects the same level of requirements from its suppliers.

Suppliers are prohibited from directly or indirectly granting, offering, promising or asking for a sum of money or any other object of value to a public official or an employee of a private company, including a Lyreco employee, for the purpose of exercising improper influence or obtaining an undue advantage. This prohibition also applies to facilitation payments.

Our suppliers are required to strictly comply with applicable anti-corruption regulations and to carry out all reasonable due diligence to detect and prevent any act of corruption and influence peddling in their business relationships.

### **Fraud**

Our suppliers must not seek to gain any advantage by using fraudulent practices or by allowing anyone else to do so.

Our suppliers are obliged to keep accurate accounts, without ever modifying the data entered in order to conceal or distort the amount of the transactions recorded.

### **Fair Competition**

Our suppliers must comply with all applicable competition laws and regulations and must refrain from any practice that restricts, distorts or prevents free competition.

### **Conflicts of Interest**

In the course of their business relationships with Lyreco, our suppliers are required to avoid any conflict of interest or any situation that could give the appearance of a conflict of interest. They are also required to inform Lyreco when a situation could lead to a conflict of interest between Lyreco and them.

### **Gifts and invitations**

Lyreco has adopted a strict policy regarding gifts and invitations considering the risk of inappropriate influence.

We therefore ask our suppliers to refrain from offering or accepting, in particular in the context of business relationships with Lyreco, any form of solicitation, gift or invitation aimed at influencing the behaviour or decision of the recipient. Prior to any offer or acceptance, our suppliers must ensure that gifts and invitations do not violate the recipient's internal rules and policies or relevant laws and regulations.





## CONFIDENTIALITY AND DATA PROTECTION

Lyreco is committed to processing and protecting sensitive information about its business partners, whether confidential information or personal data, in accordance with applicable regulations, Lyreco's internal policy and any contractual commitments.

Our suppliers have a duty to take all necessary measures to ensure adequate treatment and protection of information and data acquired in the context of the business relationship with Lyreco, especially when it concerns confidential or personal information and data. Our suppliers are prohibited from using such information and data outside the framework for which it was provided, nor from disclosing it to any third party, without having obtained the prior written approval of the owner of the information or data.

Suppliers must protect all such information and data from unauthorised access, destruction, misuse, alteration and disclosure, using appropriate physical and electronic security procedures and comply with data protection legislation.



## INTERNATIONAL EXCHANGES



Our suppliers must comply with applicable international restrictions and sanctions, as well as laws and regulations relating to the import and export of the products or services they provide. In particular, they must take all necessary steps to avoid exposing them, or Lyreco, to sanctions by a national or international authority.

## VERIFICATION AND AUDIT

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Lyreco reserves the right, directly or through an external company or organisation mandated by Lyreco, to check performance with the provisions of this Suppliers Code of Ethics and to conduct compliance audits. Our suppliers will provide the necessary information and documentation upon request.

## NON- COMPLIANCE WITH THE SUPPLIERS CODE OF ETHICS

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If Lyreco considers that its suppliers do not comply with the requirements of this Suppliers Code of Ethics, Lyreco may ask the suppliers concerned to immediately implement the necessary corrective, palliative or alternative measures, in consultation with Lyreco, or even suspend or terminate its relationship with them, without prejudice to any other right or recourse that Lyreco may have.



### **Raise your concern**

Our aim is to prevent and detect any ethical violations so that Lyreco can take appropriate action and remedy the situation.

If a supplier observes any behaviour or situation in the context of its business relationship with Lyreco that is contrary to the ethical principles defined by Lyreco, it may report it, in good faith, to a Lyreco contact person or via the «Raise your concern» whistleblowing system accessible on the Lyreco corporate website or directly at the following address :

Suppliers collaborating or wishing to collaborate with Lyreco acknowledge having received, read, understood and complied with the requirements set out in this Suppliers Code of Ethics. The person whose signature appears below guarantees that he/she is duly authorised to sign this Suppliers Code of Ethics in the name and on behalf of the supplier indicated below.

Supplier: \_\_\_\_\_

Name: \_\_\_\_\_ First name: \_\_\_\_\_

Title: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Signature  
(preceded by the mention read and approved)

Company stamp



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