

Responsible purchasing  
Code of conduct ●



Claire ROSTREN & Pascal PORTELLI  
DELTA DORE Management Board

« We believe Smart home offers the opportunity to improve living comfort & contribute to sustainability.

Our mission: We provide simple & smart solutions that make everyday life at home sustainable, safer & more comfortable »

## INTRODUCTION

Delta Dore is a French group with a European dimension, a pioneer in the smart home market. For over 50 years, Delta Dore has been applying its expertise in energy management and solar protection in homes to support the energy transition.

In addition to its commitment to exemplary social and environmental responsibility, the Group puts technology at the service of people: it encourages a more sustainable way of life, where saving energy goes hand in hand with living better, and gives everyone the means to commit to positive sobriety.

The Group's ambitions are underpinned by significant investment in R&D, which accounts for 9% of sales every year. The company combines industrial excellence with Made in France, manufacturing 5 million products a year. With its Delta Dore and Rademacher brands, it caters for consumers who entrust their installation to the expertise of a professional, and with its Home Pilot brand, for do-it-yourself enthusiasts.

We want to share with our suppliers and partners our recommendations and suggestions in terms of Corporate Social Responsibility. This Responsible

purchasing Code of conduct enables each of us to be aware of their commitments in order to favour their application.

All the commitments and rights are in agreement with the following international documents :

- ✓ Universal Declaration of Human Rights;
- ✓ Ten principles of ONU Global Compact;
- ✓ Fundamentals Conventions Of International Labor Organization;

(See annexes)

Delta Dore Group is also highly mobilized to deal with environmental matters (greenhouse gas and pollutant emissions, recycling, use of natural resources, circular economy etc.) and expects its suppliers not only to take measures through the life cycle of the products but also to suggest innovative solutions contributing to the Group's public ambitions.

By joining this Code of conduct, the supplier commits itself to respect, implement, and make its own suppliers, services providers and subcontractors to respect all the principles stated in the Code of conduct, in compliance with the applicable national laws and regulations.

## SUPPLIERS' COMMITMENTS AND RIGHTS

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### Integrity and business ethics

#### Corruption

Delta Dore Group Supplier shall not, directly or indirectly, offer, promise, grant or request illegal payments or any other undue advantages in order to obtain or retain a public contract or any other undue advantages.

The Supplier commits itself to operate in total transparency and particularly to ensure that its accounting records, registers and accounts accurately reflect all payments related to its transactions.

The Supplier commits itself to establish and implement policies and procedures regarding anti-corruption and money laundering. The Supplier shall control that its employees, representatives and any natural persons or business-related companies with comply with these policies and procedures.

#### Conflict of interest

A conflict of interest raises from a situation where personal interest and the company's interest compete. Personal interest can be direct or indirect, and it can affect you or your close relatives. This interest can be of a different nature: economical, financial, political or professional.

When the Supplier faces a risk of conflict of interest, actual or potential, it shall inform Delta Dore Group without delay.

#### Respect of competition law

The Supplier shall, on behalf of all its employees, representatives and affiliates, conduct its business in a manner that complies with competition laws, and shall take any preventive measures in order to avoid any anticompetitive behavior or practice.

In particular, the Supplier shall not enter into price cartels, quota agreements, production or sale agreements, and more generally shall not participate in any unfair practices that could result in a restriction to free competition such as

practices that tend to drive a competitor out of the market or to restrain access to the markets to new competitors by illegal means.

#### Professional alert procedure

In accordance with the provisions of Law No. 2016-1691 of December 9, 2016, known as the "Sapin II Law", the DELTA DORE Group has set up a professional alert procedure enabling the collection of reports of misconduct within the Group.

The aim of this whistleblowing system is to enable sincere, reliable and responsible communication. The DELTA DORE Group guarantees the confidentiality of the data processed and prohibits any form of reprisal or threat of reprisal against employees who make use of it.

As a result, any external and occasional employee, if faced with a situation concerning, in particular, corruption or influence peddling, or any other illicit behaviour involving a member of staff of a company in the DELTA DORE Group, may issue an alert by means of the professional alert system that has been set up.

This is a specific system and it is understood that any alert that does not fall within the scope defined for this system will not be processed.

To issue an alert, the employee must create a personal account on the secure site <https://www.wispeek.com/fr/espace-membre> and indicate the following company code D35270D, corresponding to the DELTA DORE group.

#### Confidentiality

We are responsible for the proper handling of the information provided by the suppliers, and we ensure that it is not disclosed to third parties by any means whatsoever.

Reciprocally, the supplier undertakes to ensure the confidentiality of the information and documents transmitted by Delta Dore.

## Respect of human and working rights

The Supplier shall respect Human Rights in every country it is in, including in the regions where the affirmation of Human Rights is still not sufficient.

The Supplier shall respect the fundamental rights related to work conditions, and in particular it shall:

- ✓ Abolish children's work and forbid forced and obligatory work;
- ✓ Respect all the laws about work rights whatever the country;
- ✓ Insure health and safety for any people affected by the activity;
- ✓ Eliminate employment discrimination;
- ✓ Improve work conditions and favor well-being inside the company;

The Supplier shall create and maintain a safe work environment which ensures the avoidance of any risk of work accident and professional sickness of its employees and subcontractors, of the surrounding population and of the users of its products.

### Conflict Minerals Reporting Template (CMRT)

Suppliers whose products contain, among other things, gold, tungsten, tantalum, or tin, agree to make their CMRT reporting available to Delta Dore, in accordance with the EU 2017/821 Conflict Minerals Regulation.

## Preservation of environment

Our Suppliers shall take all appropriate and tangible measures to evaluate, avoid, limit and reduce the risks and negative impacts on the environment related to their activities.

As part of our commercial relations, we ask our Suppliers to:

- ✓ Adopt the precaution principle concerning the environmental impact of the activities;

- ✓ Favor eco-design in the product to restrict their environmental impact during their entire life;
- ✓ Optimize transports and logistics to restrict carbon impact;
- ✓ Control recycling of all trash and fight wastes;
- ✓ Respect REACH regulation's and insure RoHS directive's conformity;
- ✓ Develop low consumption technology (energy, water, material) and with low carbon impact;

## Breaches of obligations

If the Supplier, due to specific circumstances, shall not be able to comply with some dispositions of the present Code of conduct, it shall inform the Group Delta Dore without delay in order to agree on corrective measures that should be implemented.

In such a situation, the Delta Dore Group may, as of right and without prejudice as to any damages that it may claim:

- ✓ Ask the Supplier to execute the corrective measures within a defined timeline and/or,
- ✓ Terminate for fault part or all of the contract and/or business relation with the Supplier, depending on the severity of the breach

The Supplier is fully responsible for any consequences related to its or its own suppliers or subcontractor's non-compliance with the dispositions of the present Code of conduct.



Yannick SCHREIBER  
Group Purchasing Director

## Responsible Purchasing Code of conduct Delta Dore Group

*Document to complete and return to Delta Dore Purchasing Department.*

### **Supplier's commitments**

We confirm to:

- Have received and familiarized with the Delta Dore Responsible purchasing Code of conduct;
- Accept that if one principle is not respect, according to the seriousness, this non-respect can be considered as an obligation failure and eventually stop our commercial relation;

We engage ourselves to:

- Favor the application of these principles;
- Inform all the suppliers and/or subcontractor related to Delta Dore activities of the principles of this Code of conduct and encourage them to comply with them;

Date: ..... / ..... / .....

Name of company: .....

Name of representative: .....

Title of representative: .....

Signature:

## ANNEXES – FUNDAMENTAL TEXTS

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### Universal declaration of human rights



Declaration adopted in 1948 by 58 States Members who constituted the General Assembly of United Nations. It aims to formulate fundamental's human rights.

See: <http://www.un.org/en/universal-declaration-human-rights/index.html>

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### Ten principles of ONU Global Compact



Volunteer agreement acted by ONU in 1999, It engage company's director to promote and respect ten main principles according to human rights, work's norm, environment and fight against bribery.

See: <https://www.unglobalcompact.org/>

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### Fundamentals conventions Of International Labour Organization



International  
Labour  
Organization

Declaration wrote in 1919 by an ONU's institution of government, employer and worker representatives, To protect and promote fundamental work rights. This common action worked on:

- ✓ Abolition of children's work;
- ✓ Elimination of forced and obligatory work;
- ✓ Respect of any applicable laws about salary, advantages, and working time;
- ✓ Healthy and security at work;

See: <http://www.ilo.org/global/lang--en/index.htm>