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**RESPONSIBLE  
PROCUREMENT CHARTER**



## **EPSA GROUP IS DRIVEN BY THE CONVICTION THAT TOMORROW'S COMPANY WILL BE RESPONSIBLE.**

**Today, this ambition leads us to build a group with high human added value. This collective project is for us a means of transformation, a source of performance and sustainable growth.**

This Charter is an integral part of the procurement and contractual procedures. It undertakes to consider the social and environmental impacts of purchases of goods or services, both in the selection phase of the supplier or subcontractor, in the contracting or in the execution of the service.

This Charter describes the social, environmental and societal commitments that EPSA Group asks its suppliers to respect.

Compliance with the principles of this Charter is therefore essential to the continuity of relations between EPSA Group and its suppliers.

Finally, EPSA Group undertakes, to the extent possible, to develop its purchases within the protected sector (disability-friendly companies and sheltered employment institutions), from "SIAE" (organisations for social inclusion through economic activity), and from any other suppliers or subcontractors with positive impact.

**Matthieu GUFFLET**

Founder and President of EPSA Group



## RESPONSIBLE GOVERNANCE

The EPSA Group is growing rapidly and must therefore take into account its social and environmental footprints in order to put them in synergy with its economic footprint.

**Controlling this, and linking these footprints, has led us to set up a solid organisation covering our societal responsibility, driven by the leadership and top management of the EPSA Group.**

To ensure that this ambition is properly implemented, the governance of the EPSA Group complies with several main principles and, in particular, respect for Human Rights. The EPSA Group is a signatory to the United Nations Global Compact and therefore supports the ten principles, including respect for human rights. The EPSA Group also promotes this, particularly in its sphere of influence.

For the EPSA Group, respecting human rights means being vigilant in identifying the potential direct or indirect negative impacts of its organisation in order to correct them.

The EPSA Group therefore continuously monitors its activity so as not to be directly or indirectly involved in any human rights violation that may be committed by another company, government, individual, group or any other entity with which it collaborates.

Also, through its international presence, the EPSA Group respects communities and seeks to respect local cultures.



## ETHICAL BUSINESS CONDUCT

The EPSA Group has established various documents to ensure its long-term involvement in matters of Social and Environmental Responsibility and in particular:

- An ethical charter
- An anti-corruption policy
- A booklet «EPSA, a responsible Group»
- CSR charter
- This a responsible purchasing charter

These documents are a guide for all the teams of the EPSA Group who have the obligation not only to respect the principles, but also to control their evolution.

These documents go far beyond mere compliance with the law, the basis of every society. They are intended to provide a framework that allows the EPSA Group to pursue its economic and societal objectives by taking into account, on a daily basis, all its stakeholders and the impact associated with their decisions.



## COMMITMENTS OF EPSA GROUP

EPSA Group is subject to compliance with various legal provisions and in particular (i) national laws relating to labour, safety and environment, (ii) international reference texts, such as the Universal Declaration of Human Rights, the International Labour Organisation Conventions and its Declaration on Fundamental Principles and Rights at work, and the OECD Convention on Combating Bribery.



### IN PRACTICE

In the supplier selection phase, all calls for tenders issued by EPSA Group include questions on commitments to sustainable development objectives (such as defined by the United Nations, Ecovadis, Label B-Corp, Global Compact membership, etc.)

Examples of questions:

- Do you have an organisation dedicated to CSR or sustainable development?
- Does your company publish a sustainability report?
- Have you identified your main environmental impacts?
- Have you identified your main social and environmental impacts?
- Have you implemented a responsible purchasing policy?
- In what ways has your company formalised its business ethics policy?

Throughout the life of the contract, EPSA Group monitors the environmental and social performance of major suppliers in order to identify and prevent potential risks. The supplier thus undertakes to provide EPSA Group with any document enabling it to demonstrate that it is meeting its commitments (integrated report, activity report, CSR report or extra-financial performance statement)

In the event of shortcomings, EPSA Group may either (i) request the supplier to remedy the discrepancies found, (ii) or implement a corrective action plan with the supplier, (iii) or, if necessary, terminate all or part of the business relationship with the supplier.



### CONTINUOUS IMPROVEMENT PROCESS

In order to improve its environmental and social approach to these suppliers, EPSA Group and suppliers may meet in order to exchange best practices in these areas and to bring best solutions to all stakeholders.





## COMMITMENTS REQUESTED FROM SUPPLIERS



### SOCIAL COMMITMENTS

The provider undertakes to comply with the law and international and national laws in force in the country in which it operates. The provider undertakes in particular to respect the principles set forth by the International Labour Organisation, in particular those of the Universal Declaration of Human Rights and the Global Compact, in terms of:

- Human rights;
- Discrimination;
- Harassment;
- Fight against forced labour and child labour;
- Freedom of association and the right to collective bargaining;
- Working conditions (remuneration, working hours, health and safety, training).



### ETHICAL COMMITMENTS

The supplier shall ensure that its activities are conducted in accordance with the defined in EPSA Group's Ethical Charter, and shall therefore not be involved in any act of corruption, extortion or embezzlement of funds or in any form of bribery.

The supplier shall prevent and prohibit the following practices:

- Money laundering;
- Bribery;
- Conflict of interest, corruption or fraud;
- Anti-competitive behaviour;
- Disclosure of employee personal data and its use for a purpose other than that for which it was transmitted, as provided for in the General Data Protection Regulation (GDPR).



### ENVIRONMENTAL COMMITMENTS

The supplier shall comply with the environmental provisions and standards applicable to its business, and comply with these environmental ethical practices in all locations where the supplier operates. In addition, the supplier must be able to demonstrate continuous improvement in its environmental impact performance.

EPSA Group therefore pays particular attention to the following practices:

- Design of products and services with consideration of environmental aspects;
- Reduction and limitation of greenhouse gas emissions, reduction of the use of non-renewable resources (energy and water) and raw materials and non-environmentally friendly products;
- Maximum restriction of waste and pollutants;
- Accountability of its employees for waste generation and the implementation of waste control and recycling optimisation.



## ABOUT OUR COMPANY

The EPSA Group is one of the European leaders in organisational and operational performance consulting. The EPSA Group supports more than 600 customers, including 36 CAC 40 companies, with strong expertise in the field of purchasing, optimisation of social-security and tax charges, financing of innovation and BPO (central purchasing). The strength of the EPSA Group derives in particular from the quality of its experts and the power of its technological solutions.

**Our promise: to identify & exploit sources of performance to improve the profitability of your business.**

Today, the EPSA Group is taking up a new challenge by inserting CSR solutions within each of its expert appraisals in order to always make an offer that is adapted to the challenges of today and anticipates those of tomorrow.

For more information:

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# Appendix

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## PREAMBLE

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As of October 1, 2020, a Responsible Purchasing Charter (the "Charter") has been put in place by EPSA Group, binding all the subsidiaries of the Group.

The Charter includes a certain number of social, environmental and societal commitments that EPSA Group asks the suppliers of the various EPSA Group subsidiaries (the "Supplier") to respect.

In addition, due to the different constraints related to the nature of the orders likely to be placed with Supplier, the latter's field of activity and that of the end customer, the EPSA Group may, individually, oblige certain Suppliers to make specific commitments ("Specific Commitments").

### **Article 1. Compliance with the charter**

By accepting our purchase order, the supplier undertakes to carry out all the commitments described in the Charter as well as the Specific Commitments described hereafter throughout the duration of its relationship with EPSA Group.

The supplier acknowledges and accepts that any failure to comply with the commitments set out in the attached charter shall constitute grounds for termination of its contractual relationship with any entity of EPSA Group, to its sole detriment.

### **Article 2. Specific Commitments**

As a result of the partnership between EPSA Group and certain of its customers, Supplier agrees to:

1. Comply with all applicable laws and regulations regarding the sourcing of minerals such as, but not limited to, tin, tungsten, tantalum and gold from conflict zones ("Conflict Minerals").  
As such, the supplier must establish a responsible purchasing and sourcing policy, reviewing its supply chain on a regular basis to ensure that there is no risk of conflict minerals in the product or equipment of the system or any systems it manufactures or sells.  
In particular, it must ensure that it does not directly or indirectly finance or provide any benefit to armed groups.

### **Article 3. Effect and implementation**

The respect of the charter takes effect as from the acceptance of the purchase order emanating from an entity of EPSA Group.



#### **Article 4. Applicable law and competent jurisdiction**

The charter is subject to French law.

Any dispute concerning it will be submitted to the Commercial Court of Paris.