RESPONSIBLE PURCHASING CHARTER

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COVIVIO

Editorial by the CEO

In 2010, Covivio launched a Responsible Purchasing policy to better involve its suppliers and advisors in its approach to integrating environmental, social and urban resilience issues into its real estate activities. In 2015, Covivio signed the Responsible Supplier Relations Charter, an initiative supported by the French government. It enshrines our constant quest for dialogue, balanced and mutually beneficial relationships with its suppliers.

After an update in 2018 to consider new regulations our Responsible Purchasing policy will find a new dimension in 2022 thanks to the partnership implemented with EcoVadis on a European scale. The system deployed by Covivio is now based on:

- the present Responsible Purchasing Charter.
- the use of a CSR clause in the contracts signed and in the calls for tender, in particular to provide a framework for the energy consumption and greenhouse gas emissions associated with the activities concerned;
- the survey questionnaire from EcoVadis, which allows us to better understand the CSR profile of our supply chain actors.

This system is shared with our German, French and Italian teams for our different products: offices, hotels and residential.

By adhering to this Charter and signing it, our suppliers and advisors undertake, on their behalf and where applicable, on behalf of their subcontractors, to implement the necessary means to comply with the 11 principles of the Charter. The provisions of this charter encourage them to answer the EcoVadis questionnaire and to integrate our CSR clause into contracts and calls for tender with Covivio and its subsidiaries. By uniting them around this dynamic, we intend to mobilise the players in our ecosystem on the issues of transparency, excellence, ethics, inclusion, and probity, and of course the prevention of the risks of fraud, corruption and influence peddling.

Since 2010, our Responsible Purchasing policy has enabled us to strengthen ties with stakeholders who integrate human, environmental and ethical considerations into the conduct of their activities.

Christophe Kullmann

CEO

A Responsible Purchasing Policy, three tools

Covivio's Responsible Purchasing Policy is deployed through three tools:

- The present Responsible Purchasing Charter, which is based on the principles of the United Nations Global Compact, the Diversity Charter and the International Labour Organisation (ILO), and promotes Covivio's ethical values. The latter aim in particular to respect the payment deadlines of suppliers and consultants, to fight against corruption and influence peddling, money laundering and anti-competitive practices, to limit economic dependence and to prevent conflicts of interest.
- The contractualization of suppliers' and advisors' CSR commitments by proposing an ad hoc clause in contracts signed with Covivio and in tender specifications.
- Evaluation of the CSR performance of relevant business partners (suppliers and consultants) via the EcoVadis rating.

This policy aims to integrate environmental, social and ethical considerations into purchasing decisions relating to the different stages of the life cycle of Covivio's assets, including design, operation and deconstruction. In this context, Covivio gives preference to suppliers and advisors that undertake, in particular, to:

- improving the environmental performance (energy, carbon, biodiversity) of assets under construction, renovation, management or occupied by Covivio's teams, through the products or services offered;
- promote social and societal actions;
- to demonstrate an exemplary attitude in terms of probity;
- to contribute to the control of budgetary expenses by evaluating, in addition to direct costs, the indirect costs of the products or services offered.

In concrete terms, Covivio ensures that it :

- apply a principle of reciprocity towards its suppliers, thus committing itself to respect the principles set out in this charter;
- raise awareness of sustainable procurement among its buyers;
- encourage the evaluation of its consultants and suppliers on CSR criteria via the EcoVadis rating; during calls for tender, and when signing new contracts;
- collaborate with its suppliers in favour of sustainable development, via working groups, whether or not in coordination with associations, or via shared R&D work;
- Conducting probity investigations and terminating all business relationships with suppliers whose behaviour proves to be contrary to the law, regulations, or ethics.

As a signatory of the Global Compact, Covivio cross-references the 11 principles of its Responsible Purchasing policy with the 17 Sustainable Development Goals (SDGs) of the UN Agenda 2030 (see Appendix 4).

Evaluation of practices

In a context of climate emergency and increasing awareness of environmental, social, and ethical issues, Covivio has adopted an ambitious CSR policy that includes issues related to its commercial partners. To ensure their CSR performance, Covivio relies to a high extend on the EcoVadis rating, an independent platform for evaluating CSR performance and responsible purchasing, when assessing commercial offers (calls for tender) and when signing new contracts.

This applies to orders placed under contracts or specifications specifying the use of the EcoVadis system. The action to be taken in this case by the supplier or consultant concerned (hereafter the "Service Provider") is analysed in the light of these four situations:

1. If they already have a valid EcoVadis assessment card (scored card), they are invited to share it with Covivio before signing the contract. In the case of calls for tender, they are invited to share it when submitting their application file;
2. If it has an expired EcoVadis assessment card, it is invited to follow the reassessment process within 4 weeks of signing this document;
3. If it has initiated an assessment process with EcoVadis, it is invited to share its assessment form with Covivio as soon as it has been completed, and at the latest within one month of submitting its response to the invitation to tender or signing the contract;
4. If they do not have an EcoVadis evaluation form but their offer is accepted, they are invited to register on the platform, complete the evaluation questionnaire and send the results to Covivio within a maximum of two months following the order placed by Covivio after the invitation to tender or the signing of the contract.

Therefore,

- In the context of tenders for works, general provisions have been included in the General Conditions of Contract (GCC) and specific provisions in the Special Technical Conditions (SCC).
- In the context of the signing of new contracts, an ad hoc clause is integrated.

The https://ecovadis.com/ page provides useful information, especially regarding the EcoVadis assessment process and the benefits of such an assessment.

Covivio covers the costs of implementing this system within the Group. However, a contribution, in the form of an annual subscription, will be paid to EcoVadis by the Service Provider, covering part of the analysis work specific to its structure (applicable rates https://ecovadis.com/plans-pricing/). In addition, the Service Provider may share its results with other clients and stakeholders.

Participation in the assessment will gradually become a key factor in Covivio's business partner selection and review process. The EcoVadis scorecard is one of the criteria taken into account by Covivio when analyzing their performance.

The 11 Principles of the Covivio Responsible Purchasing Charter

A – GOVERNANCE AND ETHICS



Main Sustainable Development Goals (SDG) covered in this section:

Covivio intends to promote mutual trust, dialogue and skill sharing with its suppliers. The signing of the Responsible Supplier Relations Charter in 2015 marks Covivio's will to develop a sustainable and balanced relationship with its suppliers.

1 The relevant supplier or consultant undertakes to initiate an appropriate and structured CSR policy, by setting up an environmental and social management system in line with the environmental, social and societal requirements of this Charter.

2 The supplier or consultant undertakes to combat all forms of corruption and influence peddling, both regarding its own suppliers or subcontractors and to its principals, and to behave ethically in its business relations. Not to engage in any corrupt activity of any kind (active or passive, financial or otherwise, directly or indirectly through a third party). Bribery includes, but is not limited to, any conduct by which a person or a related person grant, demands or accepts benefits in kind or financial benefits, including excessive remuneration for services rendered, undue advantages, gifts, or anything else of value, insider influence, extortion, embezzlement, in order to obtain, retain or grant business in the course of domestic or international activities. In its relations with Covivio, this commitment is materialised by strict compliance with the principles laid down in the company's Ethics Charter (available on the Covivio website: http://covivio.eu). Covivio has also set up a whistleblowing system, with measures to protect whistle-blowers against any reprisals (sanctions, dismissal, etc.) and to preserve their anonymity, to which its suppliers have access. Thus, in case of serious doubt, suppliers can report any misconduct involving a Covivio stakeholder that could be qualified as corruption or influence peddling. The operation of the Covivio whistleblowing system is presented on its website.

3 The supplier undertakes to communicate to Covivio all the indicators enabling it to monitor its progress on environmental, social, societal, integrity or governance criteria.

B – ENVIRONMENT

Main SDG covered in this section:



Covivio follows a structured environmental policy aimed at reducing the environmental impacts of its assets throughout their lifecycle. This approach involves suppliers in initiatives related to energy, climate, and biodiversity.

4 The supplier undertakes to implement measures to limit the environmental impact of its activity, to reduce its energy and water consumption and greenhouse gas emissions, to reduce and recycle its waste and to preserve biodiversity in an appropriate way, for example by having an ISO 14001 certified management system. In the case of wood and wood-based products, the supplier undertakes to ensure that these are legally manufactured and marketed within the EU or certified by FSC, PEFC,r SFI or similar.

5 The supplier agrees to assist Covivio in minimizing the environmental impacts associated with its supply chain by prioritizing, where appropriate, locally available, bio-based, reused materials, and materials containing recycled content. For ISO 50001-certified buildings, the supplier agrees to provide Covivio with the energy performance criteria and energy consumption of the proposed product over its expected operational lifespan. When technical and economic criteria permit, the supplier will propose solutions that offer better energy performance than the baseline solution, based on comparable indicators, conditions of use, and lifespan.

6 The supplier undertakes to limit the health impacts linked to its activity, by favouring the purchase of low-emission products that respect air quality and by implementing clean worksite procedures providing for the use of these products. In particular, the supplier shall favour eco-labelled products or A+ labelling for products emitting volatile pollutants, to promote good indoor air quality.

7 The supplier undertakes to keep itself informed and to comply with the environmental regulations in force. It undertakes to fulfil all conditions enabling it to obtain the regulatory environmental authorisations necessary for its continued operation.

C – SOCIAL AND SOCIETAL

Main SDG covered in this section:



Covivio intends to promote diversity, inclusion, and respect for fundamental rights.

8 The supplier undertakes to guarantee in the exercise of its activity the respect of safety and sanitary rules regarding its employees, subcontractors, or suppliers, and more generally for any person who might suffer from a breach of these rules. In the event of a worksite, it also undertakes to put in place an appropriate system for detecting and preventing risks and accidents, as well as mitigation procedures in the event of risks occurring, first and foremost in the event of accidents, such as the availability of first-aid kits, the presence of a doctor or rapid evacuation to the nearest hospital, etc.

9 The supplier undertakes to promote diversity by firmly condemning all forms of discrimination (age, origin, gender, disability, etc.) according to the criteria of the Diversity Charter to which Covivio is a signatory (see Annex 1 below). In particular, the supplier is encouraged to use organisations promoting the integration of people with disabilities in the context of its subcontracting contracts.

10 The supplier undertakes to comply with the labour regulations in force, in particular the eight fundamental conventions of the International Labour Organisation (ILO) relating in particular to the issues of fair remuneration, non-discrimination (age, origin, sex, disability…) and forced labour, as well as to comply with the provisions of Article 32 of the Charter of Fundamental Rights of the European Union, which prohibit child labour and protect young people at work. The supplier also undertakes to guarantee the applicable right of association and trade union rights to its employees.

11 The supplier undertakes to respect and promote the rights and freedoms enshrined in the Universal Declaration of Human Rights and the Ten Principles of the United Nations Global Compact (see Appendix 2 below).

Done at :: ……

On : ……

Company name : ……

Signatory : ……

Position: ……

Signature:

Annex 1:

Diversity Charter

Diversity is the foundation of a socially and economically successful society. As part of the overall policy of the company or organisation, the Diversity Charter aims to promote equal opportunities and diversity in all its components.

The Diversity Charter contributes to developing a management style that respects differences and is based on trust. It improves the cohesion of teams, which is a source of better living together and therefore of performance.

The commitments of the Diversity Charter, translated into actions that are measured and evaluated regularly, are factors of social and economic progress. Their implementation in all the activities of the company or organisation reinforces recognition by all internal and external stakeholders in all Covivio countries and throughout the world.

By signing the Diversity Charter, we, the company, or organisation, commit to

1. Raise awareness and train our directors and managers involved in recruitment, training, and career management, and then progressively all employees, on the issues of non-discrimination and diversity.

2. Promote the application of the principle of non-discrimination in all its forms in all acts of management and decision-making in the company or organisation, and in all stages of human resources management.

3. To promote the representation of the diversity of society in all its differences and richness, the cultural, ethnic, and social components, within the workforce and at all levels of responsibility.

4. Communicate our commitment to all our employees as well as to our customers, partners, and suppliers, to encourage them to respect and implement these principles.

5. To make the development and implementation of the diversity policy a subject of social dialogue with employee representatives.

6. Regularly assess the progress made inform internally and externally of the practical results resulting from the implementation of our commitments.

Annex 2:

The 10 principles of the Global Compact

HUMAN RIGHTS

1 Businesses should support and respect the protection of international human rights law within their sphere of influence.

2 Ensure that their own companies are not complicit in human rights abuses.

LABOUR RIGHTS

1 Businesses should respect the freedom of association and recognise the right to collective bargaining.

2 The elimination of all forms of forced or compulsory labour.

3 The effective abolition of child labour.

4 The elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

1 Businesses are encouraged to apply the precautionary approach to environmental issues.

2 Undertake initiatives to promote greater environmental responsibility.

3 Encourage the development and diffusion of environmentally friendly technologies.

FIGHT AGAINST CORRUPTION

1 Businesses are urged to act against corruption in all its forms, including extortion and bribery.

Annex 3:

Fundamental Conventions of the International Labour Organisation

TRADE UNION FREEDOM

- The Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), ratified in 1951.
- The Right to Organise and Collective Bargaining Convention, 1949 (No. 98), ratified in 1951.

THE ABOLITION OF FORCED LABOUR

- The Abolition of Forced Labour Convention, 1957 (No. 105), ratified in 1969.
- The Forced Labour Convention, 1930 (No. 29), ratified in 1939.

EQUALITY

- The Equal Remuneration Convention, 1951 (No. 100), ratified in 1953.
- The Discrimination Convention, 1958 (No. 111), ratified in 1981.

THE ABOLITION OF CHILD LABOUR

- The Minimum Age Convention, 1973 (No. 138), ratified in 1990.

  The Worst Forms of Child Labour Convention, 1999 (No. 182), ratified in 2001.

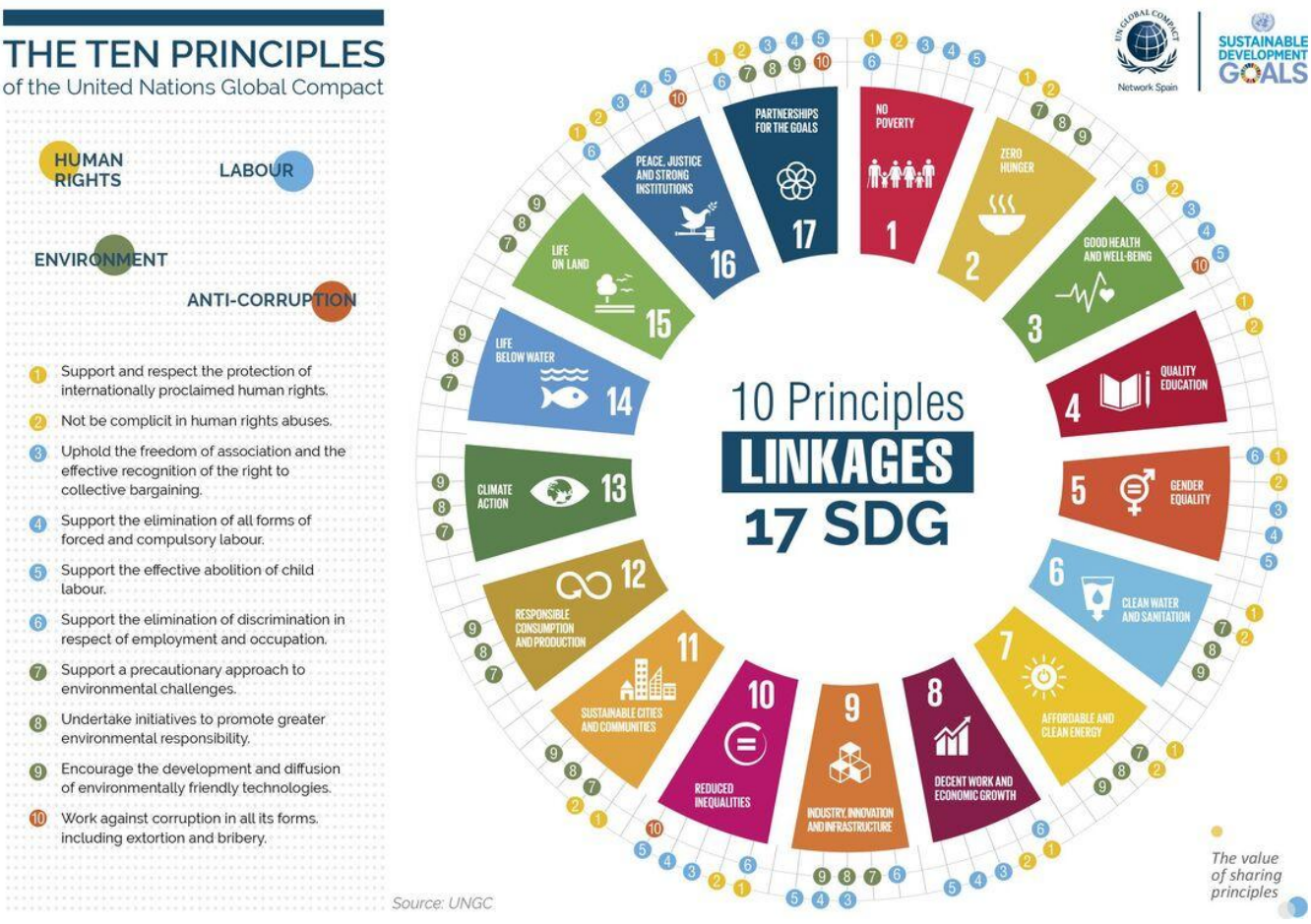
HEALTH AND SAFETY

- Convention 155 on Occupational Safety and Health, adopted in 1981.
- Convention 187 on the Promotional Framework for Occupational Safety and Health, adopted in 2006.

Annex 4:

The 17 UN Sustainable Development Goals for 2030

In September 2015 Sustainable Development Summit in New York, the 193 Member States of the United Nations formally adopted a new sustainable development agenda entitled "Transforming our World: The 2030 Agenda for Sustainable Development". This programme, which came into force on 1 January 2016, consists of 17 Sustainable Development Goals (SDGs) with 169 targets. Their aim is to combat extreme poverty, inequality and exclusion, and to tackle climate change and the erosion of biodiversity.



COVIVIO

10, rue de Madrid 75008 Paris

covivio.eu