Framework Charter



Responsible Service Providers & Suppliers



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The mission statement of FREY Group

Restoring retail as a service for the common good

Introduction

As the first French real-estate investment company to adopt the "Entreprise à mission" status, FREY Group is engaged on a daily basis in forging a more responsible, greener society that is socially beneficial to its ecosystem and its stakeholders.

At a time of considerable change in brick-and-mortar retail with a need for renewal, FREY applies its expertise for the benefit of the retail trade, its meaning and its values, by building and managing welcoming, resilient, multi-purpose sites that are profitable to regions. The Group firmly believes that shopping is much more than a mere transaction and all its actions are guided by its mission:

Restoring retail as a service for the common good

FREY and its staff have set themselves three goals:

1. Make retail a driver of urban diversity.

By stepping up their commitment to building multi-purpose sites that are useful to society.

2. Promote the role of retail in creating social contact and local economic resilience by ensuring its sites are welcoming and useful.

3. Make retail an accelerator of environmental transition. The environment has always been a core commitment at FREY and the Group has set itself the goal of achieving carbon neutrality by 2030 through concrete actions of sobriety, contribution and inclusion.

FREY Group makes strong commitments and works with service providers that both adhere to them and contribute to their fulfilment.

This Framework Charter for Responsible Service Providers and Suppliers aims to provide a common reference framework for FREY and all of its service providers in France, Spain and Portugal.

It sets out FREY Group's social and environmental commitments as well as those expected of its service providers and suppliers.

Service providers and suppliers undertake to sign and implement this Charter, and verify its application over time. Compliance with the principles set forth in the Charter is essential for the continuation of relations between FREY and its service providers.

As part of its Responsible Service Providers and Suppliers Policy:

The Group guarantees

- the appointment of a manager responsible for the application of the Charter,
- the signing of the Charter by all its staff and service providers,
- regular follow-up of the application of the Charter

FREY Group undertakes to

- ensure the objective selection and ethical and responsible treatment of all its service providers and suppliers,
- prioritise long-term relationships with its service providers to support and share joint value creation,
- prioritise local actors (companies or non-profit organisations) capable of delivering the expected level of service.

For more information about FREY Group's commitments, please visit the following page: frey.fr

Mutual commitments

FREY Group undertakes to comply with all the points set out in this Charter, and asks all its service providers and suppliers to commit to doing the same.

Principles

Signatories of the Framework Charter for Responsible Service Providers and Suppliers undertake to do everything in their power to comply with the commitments described. They guarantee its dissemination to all employees and subcontractors in a language they can understand. Lastly, they declare that they are able to demonstrate their ability to comply and ensure compliance by all their staff with the commitments of this Charter.

It applies to Service Providers and Suppliers of FREY SA and all its subsidiaries. The commitments made by Service Providers and Suppliers are based on those made by FREY Group in connection with its mission statement as an "Entreprise à mission".

Legal commitments

All FREY Group service providers and suppliers of goods and services, and all their staff and subcontractors, must comply with legislation in force in the country in which they conduct their professional activity or activities, as well as with the standards of the International Labour Organization (ILO) and those of the Universal Declaration of Human Rights. It is understood that where applicable, any national or international standards that are more stringent than those contained in this Charter will prevail.

Social commitments

Forced or compulsory labour

Formal commitment not to use any form of forced or compulsory labour.

ILO Conventions No. 29 and No. 105.

Child labour

Formal commitment to respect the minimum legal working age (i.e. 15 years).

ILO Conventions No. 138 and No. 182.

Wages and working hours

Formal commitment to comply with local regulations regarding wages, wage protection, social benefits and working hours. *ILO Conventions No. 1, No. 30, No. 95, No. 100, No. 131, No. 167 and No. 171.*

Occupational health and safety

Formal commitment to comply with all applicable laws, regulations and standards concerning health and safety and to make this commitment a priority.

Prioritise employee health and safety in all aspects of its business. Implement a health and safety policy guaranteeing employees:

· A healthy and safe working environment,

• The implementation of measures to prevent occupational illnesses and work-related accidents. *ILO Conventions No. 155 and No. 120.*

Discipline

Formal commitment to refuse any inacceptable form of treatment, such as mental or physical cruelty, sexual harassment or discrimination. Prohibition of any type of behaviour, including gestures, language or physical contact, of a sexual, coercive, threatening or abusive nature.

ILO Conventions No. 29 and No. 111.

Dignity, privacy and rights of individuals

Formal commitment to respect the dignity, privacy and fundamental rights of each individual.

Freedom of association, employee representation and the right to collective bargaining

Formal commitment to respect employees' right to freedom of association and not to exert any discrimination against members of workers' associations or trade unions. *ILO Conventions No. 87 and No. 98.*

Equal remuneration / discrimination

Formal commitment not to distinguish between people based on their age, sex, religious beliefs, political opinions, sexual orientation, social or ethnic origins, disability, family situation, nationality, family name or physical appearance. *ILO Conventions No. 100 and No. 111.*

Mutual commitments

Ethical commitments

Corruption

Formal commitment to comply with all applicable anticorruption laws and regulations, including provisions prohibiting bribes and other unethical business practices in particular. Formal commitment never to make or authorise any illegal payment to anyone whatsoever, regardless of the circumstances, particularly to employees or executives of FREY Group.

Fraud

Formal commitment to demonstrate integrity in one's work and not to conduct any fraudulent activity.

Fair competition and antitrust laws

Formal commitment to comply with national and international laws regarding free competition. Not to engage in abuse of a dominant position. Not to take part in price fixing, the allocation of markets or customers, market sharing or bid rigging with competitors.

Intellectual property rights

Formal commitment to respect third-party intellectual and industrial property rights. Not to share or disclose confidential information belonging to FREY Group, its subsidiaries or its suppliers and service providers without prior written consent.

Data protection

Formal commitment to comply with all applicable data protection laws and regulations when processing personal data concerning customers, suppliers, service providers, stakeholders and employees of FREY Group. Immediately report any unauthorised use, disclosure or loss of personal data.

Subcontracting and supply chain

Formal commitment to use best efforts to promote compliance with this Framework Charter for Responsible Service Providers and Suppliers among suppliers.

Environmental commitments

Like FREY Group, the Group's service providers must conduct their activities by seeking to take into account and reduce their environmental impact at all times.

Service providers and suppliers must be able to demonstrate, in the context of their business:

- Their commitment to environmental protection in all activities relating to the production of goods and services
- · Their compliance with applicable environmental protection standards and regulations
- Their use of renewable and recyclable materials and energy wherever possible
- The elimination or minimisation of potential environmental risks
- · Application of the precautionary principle in their approach to environmental subjects
- · Any continuous improvement actions they implement with regard to environmental protection

In addition to the above commitments, FREY Group encourages its service providers to:

- Evaluate the carbon footprint of their activities (scope 1, 2 and 3)*
- Define a target timescale for achieving carbon neutrality
- · Implement an action plan to achieve this target
- Engage their employees in efforts to protect the environment
- · Engage all of their own suppliers and service providers in an ecologically responsible approach

*Direct GHG emissions (scope 1), indirect energy emissions (scope 2), other indirect emissions (scope 3)

Implementation and follow-up of application

FREY Group implements a robust Responsible Service Providers and Suppliers Policy thanks to the systematic signing of this Charter by all its service providers and suppliers.

FREY Group has introduced the following specific Charters as part of its operational activities

The Responsible Internal Functioning Charter: covering the Group's internal activities. The Responsible Operations Charter:

covering activities linked to the operation of the sites owned, managed or jointly managed by the Group.

The Responsible Worksite Charter:

covering the Group's building, construction and renovation activities.

FREY Group encourages the establishment of policies, procedures, tools and indicators to ensure compliance with the commitments set out in this Charter.

Service providers and suppliers are, moreover, responsible for managing, overseeing and developing their supply chains to ensure compliance with the requirements described above. In the event of non-compliance with the commitments set out in this Charter, FREY Group will demand that the situation be remedied by the joint preparation and implementation of a corrective action plan.

In the event of a serious breach (legal, ethical or social commitments) or if non-compliance is not remedied, FREY Group reserves the right to terminate its business relationship with the service provider or supplier concerned.

Reporting a problem or concern

Service providers are responsible for contacting the Risk Manager should they have any questions or concerns, or if an ethical or compliance problem arises: <u>compliance@frey.fr</u> - +33 (0)3 51 00 50 50

This Framework Charter for Responsible Service Providers and Suppliers is accessible and downloadable from the FREY Group website: frey.fr



Signature of the Framework Charter for Responsible Service Providers and Suppliers

I, the undersigned

- Mr/Mrs/Ms

acting in my capacity as.....legal / authorised representative of the company (specify the name and registered office address)

.....

hereby certify:

- that our company has received and is fully aware of FREY Group's Framework Charter for Responsible Service Providers and Suppliers;

- that our company undertakes to implement these principles and that non-compliance with them may be considered a breach of its obligation which may, depending on the seriousness of the non-compliance, result in termination of the business relationship between our company and FREY and its subsidiaries;

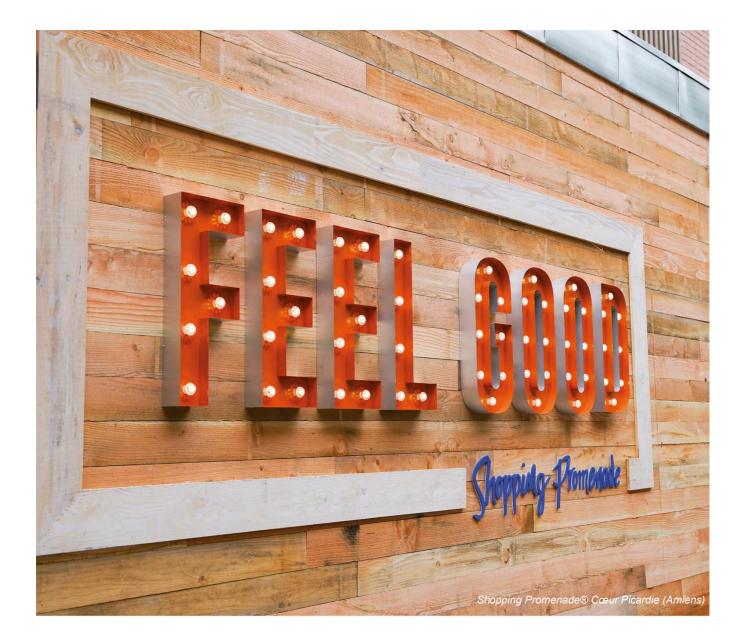
- that our company will inform all of its direct suppliers accordingly and encourage them to abide by these principles.

Signed in

On / /

Signature and company stamp

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