



sonepar

Supplier Code of Conduct

Sonepar expects its business partners to commit to the same high level of ethics. As such, specific standards are set out in a dedicated Supplier Code of Conduct and the Group has deployed procedures and tools to assess the integrity of its business partners.

Compliance Policies and Procedures

In order to effectively implement the principles and standards set out in Sonepar's Code of Conduct, various topics are dealt with more specifically in Group as well as local Compliance Policies and Procedures, such as promoting fair competition, preventing corruption, protecting data privacy, or complying with embargos and international trade regulations.

Sonepar's Compliance Program

Sonepar's Code of Conduct and its related Policies and Procedures are part of a comprehensive Group Compliance Program, which also includes educational and information campaigns, risk mapping, reporting, whistleblowing, evaluation of business partners, books and records obligations, assessments and audits.

Speak Up!

Sonepar has established a whistleblowing policy to provide a way for those who are aware of circumstances or behaviors which they believe, in good faith, could represent violations of Sonepar's Code of Conduct, Supplier Code of Conduct, Policies and Procedures and/or applicable laws and regulations, to identify and share those concerns.

How to raise a concern?

For associates, referring the matter to his/her manager is the preferred option.

If an associate is uncomfortable sharing concerns with his/her line manager, an associate can contact Sonepar's Human Resources Department (either at headquarter or local level) or the Group General Counsel's Office (groupcompliance@sonepar.com).

If an associate does not wish to interact with Sonepar's personnel, or if the person wishing to report is outside of Sonepar, a confidential whistleblower reporting system is available. It is provided by an independent third-party provider selected by Sonepar. Reports can be made at any time, 24 hours a day, in 20 different languages.

The platform can be accessed via the following link: www.sonepar.com/alert.

The reporting process is encrypted and password protected. Communication with the whistleblower takes place on this secured platform.

A Dedicated Organization

The Group VP Legal and Compliance promotes the principles and best practices set out in the Group Code of Conduct and its related Policies and Procedures along with the Regional General Counsels.

Each Regional President is responsible for the implementation of the Group Compliance Program in the Region falling under his/her responsibility along with countries' and operating companies' managers.

A worldwide network of Compliance Champions also plays a key role by providing support to Sonepar's operating companies in implementing the Group Compliance Program.

The Sonepar International Legal & Compliance Committee (SILCC)

Chaired by the General Counsel, the SILCC is composed of senior members of the Group's Legal, Risk and Compliance community.

Meeting physically once a year as well as through regular conference calls, it is *inter alia* a forum for best practices sharing, decision-making and follow up to ensure that the Group's Compliance Program is fully respected.