

GROUPE E SUPPLIER CODE OF CONDUCT



groupe 

INTRODUCTION

Groupe E is one of the leading energy suppliers in Switzerland, recognised for its commitment to sustainable energy solutions. Our operations span a variety of segments, including generation, distribution and energy services.

Seeking to accelerate the energy transition together, Groupe E is dedicated to contributing to a sustainable future. As a supplier to Groupe E, you play a key role in fulfilling this mission. This Supplier Code of Conduct describes the principles and standards we expect from our suppliers, ensuring they are aligned with Swiss law and international regulations. This Code of Conduct may be revised periodically in line with evolving legal requirements.

1. REGULATORY ISSUES

1.1 Compliance with Swiss laws

Suppliers must comply with relevant Swiss laws, including those governing labour rights, environmental protection and business standards. This includes specific laws such as the Employment Act (EA), the Illegal Employment Act (IEA), the Environmental Protection Act (EPA), the Gender Equality Act (GEA), the Data Protection Act (DPA) and the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO).

In addition suppliers must comply with all applicable laws, regulations and standards in the countries in which they operate. This includes observing international conventions and agreements on human rights, labour standards, environmental protection and combating corruption.

1.2 Environmental

1.2.1 Environmental management

Suppliers must comply with all relevant environmental laws and regulations. We encourage our suppliers to acquire and maintain recognised environmental certifications such as ISO 14001. In addition suppliers must implement an environmental

management system to identify, monitor and mitigate environmental impacts, including procedures for regular reviews and continuous improvement of environmental performance.

1.2.2 Resource efficiency

Suppliers must optimise their use of raw materials and energy and prioritise use of renewable energy sources. Efficient water use and conservation practices must be implemented. Measures must also be taken to reduce waste generation, promote recycling and ensure safe waste disposal. Suppliers are required to establish clear targets for resource efficiency and report on progress towards these targets.

1.2.3 Emissions and pollution

Suppliers must actively work to reduce emissions of greenhouse gases and other pollutants. Proper management of hazardous materials and implementation of pollution control measures are essential to prevent environmental contamination. Suppliers must also adopt practices to minimise emissions of volatile organic compounds (VOCs), particulate matter and various other air pollutants. Suppliers are required to establish clear targets and report regularly on progress.

1.3 Social, safety and health

1.3.1 Working practices

Suppliers must observe Swiss occupational safety standards, including the requirements and guidelines of Suva (the Swiss National Accident Insurance Fund). This includes implementing stringent safety measures to prevent occupational accidents and diseases.

Suppliers must comply with all applicable labour laws and regulations, such as the Swiss Posted Workers Ordinance. The use of forced labour, child labour or any form of exploitation is strictly prohibited. Suppliers must guarantee workers the right to choose their job freely and leave it with reasonable notice.



1.3.2 Employee health and safety

Groupe E attaches paramount importance to the health and safety of its staff. We therefore expect our suppliers to share this commitment by providing safe and fair working conditions, taking all necessary measures to ensure the safety of their employees. Any safety incidents that occur while carrying out work for Groupe E must be reported to our organisation as soon as possible.

1.3.3 Non-discrimination and inclusion

Suppliers must promote diversity and inclusion in their workforce. Discrimination based on race, sex, age, religion or any other characteristic will not be tolerated. Suppliers must implement policies and practices that promote an inclusive and respectful workplace, ensuring equal opportunities for all employees.

1.3.4 Fair wages and benefits

Suppliers must ensure that employees receive fair wages and benefits that meet or exceed the legal minimums set out in the relevant collective labour agreements. Working hours must comply with regulations and overtime must be compensated fairly. Suppliers must provide employees with written and understandable information on their terms and conditions of employment, including salaries and benefits.

1.3.5 Data protection

Suppliers must comply with the Swiss Federal Act on Data Protection (DPA) by guaranteeing the confidentiality and security of the personal data they process, including those of Groupe E employees and its customers. They must put measures in place to prevent any data breaches and report any security incidents to Groupe E immediately.

1.4 Governance

1.4.1 Ethical business practices

Suppliers must conduct their business ethically. Corruption, bribery and fraudulent activities are strictly prohibited. Suppliers are encouraged to exercise judgement and transparency when exchanging business gifts so these are not perceived as an attempt to influence any decisions. Conflicts of interest must be disclosed and managed transparently. Suppliers must establish clear policies and procedures to prevent corruption and ensure ethical conduct in all their business transactions.

1.4.2 Transparency and reporting

Suppliers are required to maintain accurate records and provide transparent reports on their ESG (environmental, social and governance) performance. Any failure to comply or material ESG risk must be reported to Groupe E promptly. Suppliers must establish internal and external reporting mechanisms, including protections for whistleblowers.

1.4.3 Confidentiality and intellectual property

Suppliers must protect the confidentiality of Groupe E's information and respect intellectual property rights. This includes safeguarding proprietary information and preventing any unauthorised disclosure or use thereof.

1.4.4 Management of our suppliers' suppliers

Groupe E's suppliers must also ensure that their own suppliers and subcontractors comply with the standards set out in this Code of Conduct. They must exercise due diligence to ensure that their partners comply with the ethical, social and environmental practices required by Groupe E. This includes implementing supplier selection and monitoring procedures based on ESG compliance criteria.

1.4.5 Tax transparency

Suppliers must ensure tax transparency and comply with Swiss tax obligations. They must ensure that all transactions are properly recorded and reported, avoiding any form of tax evasion or fraud.

1.4.6 Anti-corruption

Suppliers must implement strict anti-corruption policies, including confidential reporting mechanisms for employees. They must comply with the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. Suppliers must also ensure that their own business partners adhere to the same anti-corruption standards.

2. OUR SUPPLIERS' COMMITMENT

2.1 Environmental

Suppliers must demonstrate a clear commitment to environmental sustainability, including reducing negative environmental impacts and adopting environmentally responsible practices. Suppliers are encouraged to obtain environmental certifications and promote sustainability initiatives.



Suppliers are encouraged to take steps to protect and preserve biodiversity in the areas in which they operate. This includes assessing the potential impacts of their activities on local ecosystems and implementing plans to minimise them. In addition suppliers are encouraged to participate in reforestation or habitat conservation programs.

2.1.1 Contribution to the Sustainable Development Goals (SDGs)

Suppliers must align their practices with the UN Sustainable Development Goals (SDGs), especially those relevant to Switzerland, such as SDG 7 (Clean and Affordable Energy), SDG 12 (Responsible Consumption and Production) and SDG 13 (Climate Action). This includes implementing strategies to improve energy efficiency, reduce the amount of waste generated by the company's operations and minimise the carbon footprint of the products or services provided.

2.1.2 Responsible procurement

Suppliers must promote responsible procurement by choosing materials and products that have a reduced environmental impact. This includes showing preference for eco-certified products, secondary materials from reuse, recycling or treatment, and local suppliers.

2.1.3 Commitment to sustainable management of natural resources

Suppliers must act to reduce consumption and optimise the use of water and energy.

Suppliers must also adopt circular economy practices, including reducing, reusing and recycling materials.

2.1.4 Use of environmentally-friendly and recyclable materials

Suppliers must prioritise the use of environmentally-friendly and sustainable materials in their products and services. This includes sourcing certified materials such as wood from sustainably managed forests, and using non-toxic substances in manufacturing processes

2.2 Social, safety and health

Suppliers must ensure a safe and healthy working environment for their employees, respecting social standards and ensuring occupational safety and health. They must promote non-discrimination and inclusion and ensure fair wages and benefits for their

employees. Suppliers are also encouraged to engage in community initiatives and contribute positively to the development of local communities.

This includes supporting local initiatives, employing local workers and contributing to local economic development.

2.3 Governance

Suppliers must follow ethical and transparent business practices, complying with applicable laws and regulations. They must ensure confidentiality and data protection, prevent corruption and manage conflicts of interest transparently. Suppliers must also manage their own suppliers responsibly, ensuring that they adhere to the same standards of compliance and ethics.

Suppliers must identify, assess and manage the risks associated with their operations. This includes financial, operational, environmental and social risks. Suppliers must implement risk management systems and contingency plans to minimise potential adverse impacts.

3. IMPLEMENTATION AND COMPLIANCE

3.1 Controls and audits

Groupe E reserves the right to monitor and audit its suppliers to ensure compliance with this Code of Conduct. Suppliers must cooperate fully during audits, which may include site visits, reviews of relevant files and interviews with employees.

3.2 Continuous improvement

Suppliers must strive to continuously improve their ESG performance. At the request of suppliers, Groupe E can support them in achieving higher standards through collaborations and capacity building initiatives. Suppliers should review and update their policies and practices regularly to improve their performance.

3.3 Management of conflicts of interest

Suppliers must identify, disclose and manage any potential conflict of interest transparently. They must put procedures in place to prevent personal or financial interests from compromising their professional integrity and ability to comply with the Groupe E Code of Conduct.



3.4 Consequences of failure to comply

Failure to comply with this Code of Conduct may result in corrective actions, termination of contracts or termination of business relationships. Groupe E will work with suppliers to resolve non-compliance issues and encourage improvements, but reserves the right to take the necessary steps to protect its interests and maintain its standards.

DECLARATION OF COMPLIANCE

By signing this document the Supplier acknowledges that it understands and commits to comply with the principles and standards set out in this Supplier Code of Conduct.

Supplier name: _____

Authorised representative(s): _____

Signature(s): _____

Date : _____

This Code was adopted by the Group Executive Board in April 2025.