

HIGHCO GROUP'S **RESPONSIBLE** **PURCHASING POLICY**

Applicable as of 1 November 2024

HighCo

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VERSION	DATE	REVISION
V1.0	09/2014	Initial version
V2.0	10/2024	Update

Introduction

This responsible purchasing policy (“Policy”) was developed jointly by HighCo and its subsidiaries (“HighCo Group”) to make its suppliers and contractors (together, referred to in this document as “Service Providers”) the central focus of our commitment to promote ethical and sustainable practices.

In accordance with our values – Innovation, Passion, Respect and Performance – as well as our area of engagement, “**Taking action for more sustainable marketing**”, this policy is structured around three pillars:

- Foster a culture that promotes the fulfilment and performance of our employees;
- Design sustainable marketing and communication solutions;
- Guarantee a high level of data security.

We signed the United Nations Global Compact in 2014 and have since worked towards its 10 principles (see Appendix). This support reflects HighCo Group’s expectations of its Service Providers in the areas of human rights, labour, environment and anti-corruption.

The Policy underscores HighCo Group’s pledge to engage in sustainable sourcing, while requiring its Service Providers to adopt practices that are consistent with our targets and CSR goals. It covers three key commitments:

1. Support strict respect for human rights and labour standards

- **Respect for human rights:** In accordance with our values and applicable regulations, we firmly prohibit any form of child labour, forced or compulsory labour, as well as any form of poor treatment of individuals. We require all our Service Providers to comply with the highest international labour standards and, more specifically, the conventions of the International Labour Organization.
- **Prevention and ban of all forms of discrimination:** We expect our Service Providers to set prevention measures and to ban any form of discrimination, whether it relates to age, gender, ethnicity, sexual orientation or disability. We ask them to apply principles of inclusion and equal opportunity.
- **Provide a work environment that protects the health and safety of workers:** We require the implementation of preventive measures and strict safety standards to guarantee the health and safety of all employees involved in our supply processes.

2. Decarbonise our supply chain

- **Include carbon emissions as a criterion in the Service Provider selection process:** We put priority on Service Providers that demonstrate a tangible commitment to lowering greenhouse gas (GHG) emissions by measuring and reducing their carbon footprint.
- **Encourage the decarbonisation of data centres:** We urge our Service Providers to adopt more environmentally friendly data hosting solutions. We give priority to Service Providers with the appropriate certifications (e.g. ISO 50001 and ISO 14001), which demonstrate their commitment to reducing their carbon footprint.
- **Prioritise Service Providers that integrate eco-design into their products and services:** By 2030, all website applications developed by HighCo Group will have to meet eco-design criteria.
- **Promote the circular and/or local economy:** We put priority on products and services that contribute to the circular and/or local economy as soon as possible, which contributes to reducing our carbon footprint and supporting local know-how.
- **Prioritise Service Providers that promote low-carbon transport:** By 2030, our goal is for 50% of the Service Providers we work with to have set quantified GHG emissions reduction targets for 2030, of which 25% use electric vehicles, a fleet powered by bio-CNG, or non-motorised mobility solutions.
- **Use more sustainable materials to produce our communication and promotional media:** By 2030, our goal is to convert 50% of the plastic used to cardboard or paper for all communication and promotional media and to use at least 30% of recycled plastic in the production process.
- **Prioritise sustainable materials for advertising objects:** By 2030, HighCo Group aims to discontinue the purchase of any advertising objects made primarily of plastic, reflecting its goal to transition towards more sustainable options.

3. Be a trusted partner in the areas of business ethics and data security

- **Adopt outstanding business conduct:** We condemn all forms of corruption, money laundering and tax fraud. We encourage fair relations with each of our Service Providers based on mutual respect and transparency in our business dealings. Therefore, we require all of our Service Providers to:
 - Sign this responsible purchasing policy every three years, with a pledge to respect the 10 principles of the United Nations Global Compact, which can be found in the Appendix;
 - Read and comply with HighCo Group's anti-corruption documentation available at <https://www.highco.com/en/investors/anti-corruption-compliance/>;
 - Inform HighCo Group of any risk of economic dependence as soon as possible.
- **Comply with the General Data Protection Regulation (GDPR):** We require all our Service Providers to guarantee full confidentiality and security with the personal data of our clients and employees, by implementing adequate measures to prevent any unauthorised access or misuse of personal data. In addition, any Service Provider that processes personal data on our behalf must sign a data processing agreement.
- **Ensure strong personal data security:** We put priority on Service Providers that ensure high compliance in personal data processing, especially those with data security certifications and/or labels. For data transfers outside the EU, Service Providers must apply the relevant rules (Standard Contractual Clauses (SCCs), Binding Corporate Rules (BCRs), etc.) and perform a data transfer impact analysis (DTIA) in line with GDPR requirements.

HighCo Group gives special importance to its Service Providers' adherence to and compliance with the principles set out in this Policy. Consequently, throughout their business relationship, the Service Provider agrees to authorise HighCo Group, either directly or via a third party, to check that the Service Provider is in compliance with these principles, either through requests for supporting documents, a self-assessment questionnaire or on-site verification.

Any failure on the part of the Service Provider to comply with the principles in this Policy identified during this verification will be analysed carefully by both HighCo Group and the Service Provider, so that a corrective action plan can be implemented. If the Service Provider refuses to adopt the improvement process to correct these breaches and achieve the objectives set out in this Policy, or if these breaches persist, HighCo Group is entitled, and without compensation or notice, to terminate all agreements and commercial relations entered into with the Service Provider.

HighCo Group reiterates its commitment to working closely with its Suppliers to provide a responsible supply chain. We firmly believe that this cooperation is essential to meet our shared sustainability goals and take action for more sustainable marketing.

<p>We, company name: _____</p> <p>Represented by: _____</p> <p>Acting as: _____</p> <p>Hereby confirm that we have received and fully acknowledge HighCo Group's Responsible Purchasing Policy and that we commit to implement these principles.</p> <p>Date: _____</p> <p>Signature:</p>

THE 10 PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT

Human Rights

1. Support and respect the protection of internationally proclaimed human rights; and
2. Make sure that they are not complicit in human rights abuses.

Labour

3. Uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. Uphold the elimination of all forms of forced and compulsory labour;
5. Uphold the effective abolition of child labour; and
6. Uphold the elimination of discrimination in respect of employment and occupation.

Environment

7. Support a precautionary approach to environmental challenges;
8. Undertake initiatives to promote greater environmental responsibility; and
9. Encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption

10. Work against corruption in all its forms, including extortion and bribery.

HighCo