



November 2024

SUPPLIER ETHICS CHARTER

Kaufman and Broad adopted a Supplier Ethics Charter aimed at involving its suppliers and partners in its CSR strategy and formalising best practise objectives.

Kaufman and Broad calls on its suppliers and partners to respect this Charter in the course of their organisation and the performance of their missions by implementing the necessary means. The parties undertake to respect the said Charter.

FOREWORD

Adopting responsible behaviour towards all its stakeholders is one of the focuses of the Kaufman & Broad Group's CSR strategy.

Kaufman & Broad affirms its commitment to respect the 4 principles set out in the United Nations Global Compact:

- Business ethics and the fight against corruption
- Human rights and working conditions
- Environmental protection
- Data protection

The Group wishes to involve its suppliers and partners in its CSR strategy and has established this Charter to formalise best practise objectives and maintain the relationship of trust that exists with them.

Kaufman and Broad undertakes to treat its suppliers and partners fairly and honestly and requests them to respect this Charter by implementing the necessary means.

Any serious and deliberate breach by the supplier of the principles set out in this Charter will constitute a breach of its contractual obligations, which may, depending on the seriousness of the breach, result in the application of the coercive measures provided for in the contract, which may, if necessary, be terminated outright to the detriment of the supplier, without prejudice to any damages.

In the event that a supplier, due to particular circumstances, is unable to comply with certain provisions of this Charter, the supplier and Kaufman & Broad may establish an action plan to agree on corrective measures to be implemented and determine the conditions for maintaining contractual relationships.

BUSINESS ETHICS

• **Fight against corruption**

The Group prohibits any form of corruption, active or passive, in the conduct of its business and formally prohibits its employees from accepting or practising it, whether with customers, suppliers, agents or representatives of public authorities, political parties, etc.

For several years, the fight against corruption has intensified, in particular because of the legislative framework resulting from international conventions and national legislation. In this context, the Group ensures that it complies with the changes that apply to it, particularly in the context of the Sapin 2 law.

Kaufman & Broad requires its suppliers to comply with all anti corruption regulations.

As a result, the Group requires its suppliers to ensure that the negotiation and execution of contracts does not give rise to situations that may be classified as active or passive corruption, influence peddling or, more generally, any breach of the duty of probity (in particular embezzlement and favouritism).

In this context, Kaufman & Broad asks its suppliers not to offer its employees any benefits or gifts that deviate from normal practices, which could impact decision making with regard to the hierarchical position or function exercised by the employee,

The group is developing this policy in order to avoid any advantage that could corrupt or influence the group's employees in its relations with the supplier.



• **Conflicts of interest**

Kaufman & Broad is committed to making every employee aware that any situation where his or her personal interests (or those of a natural or legal person to which he or she is related) could conflict with those of Kaufman & Broad should be avoided.

The Group asks its suppliers and partners to commit to avoiding any situation that may present a conflict of interest, in particular:

- Performing a professional activity or significant financial interests with Group employees,
- Or any business relationship between Kaufman and Broad with a relative or close relative of a group employee.

In the event of a potential conflict of interest, the supplier undertakes to inform the Management of Kaufman & Broad without delay for a decision by a person other than the employee concerned.

• **Competitive practise**

Kaufman & Broad requires its suppliers to comply with existing competition regulations and to take all necessary measures to avoid anti competitive practices.

WORKING CONDITIONS

• **Respect for fundamental rights**

The Group supports the principles of the United Nations Global Compact relating to human rights, labour standards and the environment and ensures compliance with the principles it defines, in particular the fundamental rights resulting from the Universal Declaration of Human Rights, the dignity and value of the human person, the privacy of employees and the equal rights of women and men.

Kaufman & Broad calls on its suppliers and partners to respect and promote fundamental rights, particularly as covered by ILO conventions.

The Supplier undertakes not to use forced or compulsory labour as defined in Conventions C29 and C105 of the International Labour Organisation(Ilo).

The Supplier undertakes to apply the provisions relating to the elimination of child labour and the protection of children and adolescents, as defined by the legislation. In particular, it undertakes not to employ persons who have not reached the minimum age required to work under the legislation or, failing that, by ILO Conventions C138 and C182.

• **Diversity and the fight against discrimination**

The Group encourages diversity of profiles and backgrounds in compliance with its non discrimination commitments. The group is committed to combating all forms of discrimination.

Kaufman & Broad asks its suppliers to combat any form of discrimination.

• **Freedom of association and right to negotiation**

The Group encourages the individual expression of employees, in particular through the coordination of employee representative bodies.

Kaufman & Broad asks its suppliers and partners to respect the collective representation of employees and the freedom of association of their employees.



• Combating illegal, concealed work

Kaufman & Broad is committed to fighting illegal and hidden work. In this context, the Group fulfils its verification and injunctive obligations with respect to companies in accordance with its regulatory obligations and may entrust a service provider with a mission to monitor the presence of construction sites.

Kaufman & Broad asks its suppliers:

- Not to resort to illegal work,
- Not to use concealed work,
- Respect the labour law in force.

• Working hours and level of remuneration

Kaufman & Broad is committed to promoting the quality of life at work and personal by ensuring compliance with the legal rules on working time and remuneration.

The Group requires its suppliers to:

- Comply with applicable minimum wage legislation,
- Pay employees their salaries on a regular basis,
- Comply with applicable legislation on working time.

• Health and safety

Kaufman & Broad implements the necessary means and tools to ensure the safety and health of employees in the performance of their duties at the Group's various sites, in situations of travel or on worksites, in accordance with the regulations in force.

Kaufman & Broad asks its suppliers and stakeholders to ensure the safety and health of their employees in the performance of their duties, in particular through the strict application of the rules governing worksites and to make its employees aware of them if necessary. This attention must concern employees as well as temporary workers, employees of suppliers and subcontractors on worksites and more generally any person likely to be close to worksites, particularly local residents, or end users of construction.

ENVIRONMENT

Kaufman & Broad is committed to a process to reduce its environmental impact related to its business, in accordance with environmental regulations and its own commitments defined in its CSR strategy.

• Compliance with standards and agreements

The Group requires its suppliers to comply with environmental laws, regulations, standards and contractual conditions (in particular the Green Building and Low Nuisance Charter, environmental certification, etc.) applied to protect the environment related to their activities. In particular:

- Certify the compliance of materials, products or components supplied and/or implemented in the Group's real estate projects with the provisions of the directives on the control of hazardous chemicals (particularly Regulation No. 1907/2006/EC, known as the **REACH** Regulation, as amended in 2018 by Regulation No. 2018/675/EU and Directive and Directive 2017/2102/EU amending Directive 2011/65/EU, known as the **RoHS** Directive),
- Certify that biosourced materials, components and products are PEFC or FSC certified and comply with the European Regulation against Deforestation and Forest Degradation(EUDR) known as 'Zero Deforestation,'
- Certify that the production cycle of materials, components or products does not affect biodiversity sensitive areas.

If non compliance is detected, the supplier undertakes to immediately alert Kaufman & Broad (email contactrse@ketb.com).

- **Continuous improvement and targets**

Kaufman & Broad takes its environmental impact into account and has set itself targets for:

- Reduce its carbon emissions related to its business and products,
- Preserving biodiversity and ecosystems,
- Do not harm sensitive and/or protected natural areas,
- Preserve natural resources (water, materials, etc.),
- Promote a circular economy, maximise the integration of recycled materials into products, promote the sustainability of products, promote their re employability and recyclability and act to reduce, sort and recover waste,
- Minimise the use of plastic products and components,
- Avoid pollution and use non polluting products.

Kaufman & Broad asks its suppliers to take environmental issues into account in the practise of their activities, especially for the group, and to raise awareness among their employees as needed.

The Group invites its suppliers and partners to formalise environmental objectives, particularly through external bodies such as the Science Based Target Initiative, and to mention their commitments in calls for tender.

DATA PROTECTION

Kaufman & Broad collects and uses data provided by its stakeholders in the course of its business. The Group is committed to ensuring the protection of this data, in accordance with European Regulation No. 2016/670 on the protection of personal data(GDPR) and to implementing the necessary measures.

The supplier undertakes to:

- Comply with the regulations in force applicable to the processing of personal data collected in the course of its activity, in particular European Regulation No. 2016/670 on the protection of personal data(GDPR),
- Put in place the necessary measures to ensure the confidentiality and protection of data,
- Inform in the event of an incident that could compromise the confidentiality of the data,
- Ensure that a confidentiality agreement is signed before any information is shared with third parties if necessary.