

The background features several thin, overlapping lines in dark blue and light cyan. These lines form various geometric shapes, including triangles and quadrilaterals, some of which are partially cut off by the edges of the page. The lines are arranged in a way that creates a sense of depth and movement.

# **Supplier code of conduct**



# Introduction

As a global hyperscale Cloud provider, OVHcloud wants to ensure its entire value chain operates in line with OVHcloud values and ethics. Within OVHcloud, our Code of Ethics applies.

The purpose of this Supplier Code of Conduct is to ensure that its suppliers will adopt a similar compliance approach and run their business responsibly.

OVHcloud requires its suppliers and their employees, agents, and subcontractors (collectively referred to as “Suppliers”):

- ▶ to comply with all applicable local and national law and regulations and relevant international treaties, in all the places where they do business (“applicable law”)
- ▶ to adhere to this Supplier Code of Conduct.



## 1. Human Rights

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Suppliers are required to comply with applicable law concerning human rights of employees and stakeholder and in addition OVHcloud expects Suppliers to protect the human rights of their employees or any stakeholder (Customers, suppliers, shareholders, etc...) as defined in the Universal Declaration of Human rights.



## 2. Labour

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### Child labour

OVHcloud forbids child labour in its supply chain. Suppliers shall employ only workers who are at least 15 years of age or the applicable minimum legal age, whichever is higher.

Suppliers must not ask young workers (workers under 18 but over 15) to perform work that might jeopardize their health or safety. Suppliers shall not require such workers to work overtime or perform night work.

### Forced Labour

OVHcloud forbids all kinds of forced or compulsory labour. Supplier's employees shall be free to choose their employer, to resign their employment in accordance with applicable law without unlawful penalty, they shall not receive any punishment, mental or physical threats or constraints, etc...

Supplier shall not retain employee identity papers (passport, work permits...) or financial deposits.

Supplier shall comply with all applicable laws concerning modern slavery.

### **Working Hours**

Working conditions shall respect local regulation. Normal working hours shall not exceed 60 hours/week and workers should be allowed at least one day off per seven-day week.

Suppliers are expected to provide their employees with fair and competitive compensation and benefits. Suppliers must ensure overtime is voluntary and paid in accordance with applicable law.

### **Diversity and Fair treatment**

Suppliers are expected to treat all employees equally. Discriminatory treatment typically takes into consideration – consciously or unconsciously – irrelevant characteristics of an employee such as race, national origin, gender, age, physical characteristics, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, gender expression or any unlawful criterion under applicable law.

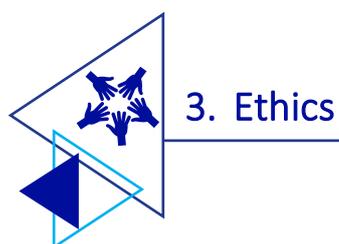
### **Freedom of Association**

Suppliers will respect the rights of their employees to associate freely, join labour unions, seek representation, join works councils and engage in collective bargaining to the full extent permitted under applicable law.

## Health and Safety

Suppliers shall provide a safe and healthy working environment and operate in an environmentally responsible and efficient manner. Supplier's employees should have access to relevant dedicated training sessions and documentations regarding safety at work, depending on the nature of their tasks.

Suppliers will protect their employees from any chemical, biological and physical hazards and unduly physically demanding tasks in the workplace. Suppliers will provide appropriate controls, safe work procedures, preventative maintenance and necessary technical protective measures to mitigate health and safety risks in the workplace.



## 3. Ethics

### Corruption and Fraud

OVHcloud requires its suppliers to forbid all forms of corruption, to adopt within their organization their own code of conduct, and to comply with applicable law, regulation and norms concerning corruption such as French law called LOI n° 2016-1691 du 9 décembre 2016 relative à la transparence, à la lutte contre la corruption et à la modernisation de la vie économique, the Foreign Corrupt Practices Act, the UK Bribery Act, the OECD Anti-Bribery Convention.

Suppliers are made aware that OVHcloud Code of Conduct prohibits OVHcloud employees from receiving gifts exceeding a certain value. To avoid embarrassment, Suppliers are therefore expected not to offer to OVHcloud employees gifts that they would be obliged to refuse if they exceed the value of 150€ or country-specific amounts for non € countries.

### Money Laundering and Terrorism Financing

OVHcloud requires its suppliers to take relevant measures to combat economic crime, money laundering, fraud and terrorism financing in accordance with applicable law. Suppliers shall provide transparent, accurate and reliable information according to local regulation.

## Fair Competition

OVHcloud requires its suppliers to conduct their business in line with fair competition and in accordance with applicable law concerning anti-trust regulation. Suppliers shall avoid any potential situation of conflict of interests, abuse of a dominant position, etc...

If a Supplier considers that it may be in a situation of economic dependence with OVHcloud under French or applicable law, the Supplier should immediately report this situation to OVHcloud.

## Insider Trading

Suppliers shall comply with applicable law concerning insider trading. By not buying or selling OVHcloud or another company's shares when in possession of information about OVHcloud or another company that is not available to the investing public and that could influence an investor's decision to buy or sell the shares.

## Export Control

Suppliers shall comply with all applicable law concerning trade controls, export, re-export, and import.

## Data protection and Privacy

Suppliers must comply with data protection applicable law governing privacy and data protection (and in particular GDPR if they process personal data of citizens of the European Union).

## Confidentiality

Suppliers will safeguard and make only appropriate use of confidential information belonging to OVHcloud. Suppliers shall not share any confidential information received by OVHcloud with any third party without the prior consent of OVHcloud as defined in the NDA (Non-Disclosure-Agreement) executed between OVHcloud and its Supplier.



## 4. Environment

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Suppliers shall comply with all applicable environmental law regarding hazardous materials, air emissions, waste, and wastewater discharges, including the manufacture, transportation, storage, disposal, and release to the environment of such materials.

OVHcloud expects its Suppliers to engage in the development and use of climate-friendly products and processes to reduce power consumption and greenhouse gas emissions.

OVHcloud expects Suppliers to endeavour to reduce or eliminate waste of all types, including water and energy, by implementing appropriate conservation measures in their facilities, through their maintenance and production processes, and by recycling, re-using, or substituting materials.

Suppliers are required to refrain from the use of chemical substances which are prohibited by applicable law. European Suppliers must be fully compliant with the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and RoHS regulations. Suppliers are required to properly disclose information about the use of chemical substances which are required by regulations, such as substances of very high concern.

Responsible sourcing of minerals: Suppliers shall have a policy to ensure that their products do not contain minerals originated from conflict regions that directly or indirectly finance or benefit armed groups.

### Air Emissions

In accordance with applicable law, Suppliers shall identify, manage, reduce, and responsibly control air emissions emanating from their operations that pose a hazard to the environment. Supplier shall conduct routine monitoring of the performance of its air emission control systems.



## 5. General Provisions

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Suppliers that want to do business with OVHcloud shall sign this code of conduct and respect it as long as they are working with OVHcloud.

OVHcloud may verify Suppliers' compliance with its code of conduct by requesting additional information such as self-assessments or statements.

Any failure by the Supplier to comply with this Supplier Code of Conduct may give OVH the right to terminate the contract.



### Whistleblowing

OVHcloud requires its Suppliers to report any violation of the OVHcloud Code of Conduct.

Suppliers can contact OVH compliance team by mail [compliance\[@\]ovh.com](mailto:compliance[@]ovh.com) or through OVHcloud whistleblower platform ROGER.



As a reminder, OVHcloud Suppliers are expected to respect the United Nations global compact ten principles and the eight international labour organization conventions:

## United Nations Global Compact 10 Principles :

Principle 1: Support and respect the protection of internationally proclaimed human rights.

Principle 2: Make sure that they are not complicit in human rights abuses.

Principle 3: the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: the elimination of all forms of forced and compulsory labour.

Principle 5: the effective abolition of child labour.

Principle 6: the elimination of discrimination in employment and occupation.

Principle 7: support a precautionary approach to environmental challenges.

Principle 8: undertake initiatives to promote environmental responsibility.

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

## International Labour Organization Conventions:

C029 Forced Labour Convention, 1930

C087 Freedom of Association and Protection of the Right to Organise Convention, 1948

C098 Right to Organise and Collective Bargaining Convention, 1949

C100 Equal Remuneration Convention, 1951

C105 Abolition of Forced Labour Convention, 1957

C111 Discrimination (Employment and Occupation) Convention, 1958

C138 Minimum Age Convention, 1973

C182 Worst Forms of Child Labour Convention, 1999

Location / Date

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(Name/first name)

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(Position)

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(Signature + Company Stamp)