

vivendi

Sustainable Purchasing Policy

December 2020

PREAMBLE

The Vivendi Group's Sustainable Purchasing Policy sets out the principles designed to ensure ethical and sustainable business relationships between Group companies and suppliers of goods and services and subcontractors, in strict compliance with applicable laws and regulations and the Group's Corporate Social Responsibility (CSR) commitments.

These principles reflect the Group's commitment to undertake all necessary efforts to mitigate risks and prevent serious violations in the areas of ethics, the environment and human rights associated with its business activities, and to optimize its positive impacts throughout its value chains as part of a sustainable purchasing approach.

Purpose of the Sustainable Purchasing Policy:

- To share the Group's commitments with its suppliers and subcontractors and ensure their involvement in sustainable development.

The Vivendi Group expects its suppliers and subcontractors to comply strictly with the laws and regulations applicable in the countries where they operate or provide services and, if necessary, to take any appropriate corrective action in an effort to achieve continuous improvement.

Frédéric CREPIN

Group General Counsel
Chief Compliance Officer

THE VIVENDI GROUP'S COMMITMENTS TO ITS SUPPLIERS AND SUBCONTRACTORS

THE VIVENDI GROUP COMMITS TO:

- establish lasting business relationships conducive to the prevention and management of risks and challenges related to working conditions, environmental protection, business ethics and human rights;
- maintain an open and constructive dialogue with its suppliers and subcontractors regarding their ability to meet their commitments, and help them, to the extent possible and in a spirit of cooperation, to develop and implement appropriate action plans;
- select suppliers and subcontractors fairly and impartially, based on predefined criteria and objectives;
- include social and environmental clauses in calls for tender whenever possible;
- when possible, give preference to candidates with the best CSR performance;
- avoid situations of economic dependence;
- identify and prevent conflicts of interest in relationships with suppliers and subcontractors;
and
- raise awareness and train its purchasers on its compliance program and its CSR commitments.

COMMITMENTS THE VIVENDI GROUP EXPECTS FROM SUPPLIERS AND SUBCONTRACTORS

Suppliers/subcontractors acknowledge that their commitments to human rights, working conditions, environmental protection and business ethics issues are essential to the establishment and continuation of a business relationship with the Vivendi Group. Accordingly, they undertake to exercise transparency, good faith and cooperation to ensure that these commitments are respected at every stage of the relationship.

Suppliers/subcontractors undertake to comply with all national and international standards applicable to their activities in the following areas, and in particular, they must:

a. Social issues and human rights

- Adhere to the principles of the United Nations Global Compact.
- Under no circumstances permit any of the following in their operations:
 - the use of child labor, other than in the exceptional cases allowed by Convention Nos. 138 and 182 of the International Labor Organization (ILO);
 - practices qualified as modern slavery or forced, compulsory or clandestine labor within the meaning of ILO Conventions Nos. 29 and 105; or
 - any form of physical, moral, or sexual harassment or any form of discrimination based on origin, gender, sexual orientation, age, family status, pregnancy, physical appearance, state of health, nationality, or union or religious membership within the meaning of ILO Convention Nos. 100, 111 and 156.
- provide decent working conditions and maintain health and safety standards that are compliant with ILO Convention Nos. 102 and 155.
- establish clear working hours and ensure that their workers are paid for the time they work and that they receive equal pay, as well as breaks and time off.
- ensure that wages paid to their workers are adequate to provide a decent standard of living and to meet basic needs, with due regard given to the general level of wages, the cost of living and social security benefits, and that they are paid regularly and within a reasonable period of time (ILO Convention Nos. 95 and 131).

- respect workers' freedom of association and collective bargaining rights, or, where locally restricted or prohibited, allow any other forms of representation and free and independent bargaining (ILO Conventions Nos. 87, 98 and 154).
- offer and promote access to training and skills development for workers.
- treat migrant workers fairly and comply with the principles of ILO Convention No. 97.

b. Ethics and compliance

- Contribute to the fight against corruption and conflicts of interest in their activities and their relations with their own suppliers and subcontractors.
- Comply with French regulations and the Economic Cooperation and Development (OECD) guidelines on the prevention of corruption and influence-peddling and any similar legal provisions. They must also prevent these practices by taking effective measures vis-a-vis shareholders, corporate officers, employees, affiliates, subcontractors, suppliers and their respective representatives who are directly or indirectly involved in any way whatsoever, in the business relationship.
- More generally, comply with all national and international standards related to financial misconduct, especially those related to the financing of terrorism, money laundering, embargoes, and arms and narcotics trafficking.
- Suppliers and subcontractors must promote free competition by forbidding any consultation or agreements on pricing and offers and participation in any cartels.

c. Environment

- Comply with environmental protection rules and do whatever is possible to prevent, mitigate and repair any negative impacts of their business activities.
- Offer and, to the extent possible, implement increasingly efficient environmental solutions.
- Work towards implementing their industry's best practices to optimize water and energy consumption, preserve biodiversity and manage discharges and waste. Strive to reduce and/or treat airborne emissions, the release of effluents into the ground and/or water and all types of pollution resulting from their business activities.

The Vivendi Group reserves the right to carry out audits to monitor compliance with the commitments set forth in this policy by its suppliers and subcontractors.

The Vivendi Group expects its suppliers and subcontractors to take all reasonable measures to ensure that their own suppliers and subcontractors comply with the terms of this policy.

The undersigned

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hereby confirms to have taken full cognizance of the Vivendi Group's Sustainable Purchasing Policy.

Any failure by the supplier or subcontractor to comply with this policy may be considered a breach of contract and may result in the termination of the contract, depending on the seriousness of the offense.

Company's name:

Name and function of the representative:

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In:

Signature :

The : __/__/__