



RESPONSIBLE PROCUREMENT POLICY

—
2024-2026

LBPAM 

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FOREWORD

As part of its CSR strategy, LBP AM is strengthening its commitments with a new responsible procurement policy. With this approach, LBP AM is committed to consolidating responsible and ethical relationships with its suppliers, in favor of social progress, the environment and economic development.

To this end, this policy promotes values of exemplary behaviour and responsibility with all its stakeholders. In line with LBP AM's DNA, it fosters a constant search for innovation at the service of economic, social and environmental performance. Ambitious indicators have been set per pillar until 2026 to develop relationships of trust and mutual progress with suppliers and integrate social, societal and environmental criteria into LBP AM's consultations.



Procurement: an essential lever for promoting our commitments

LBP AM shares and promotes the definition of responsible procurement on the basis of ISO 20400: “procurement that has the most positive environmental, social and economic impacts possible over the entire life cycle”. LBP AM seeks out suppliers that offer services and products meeting that definition within a collaborative approach with all stakeholders.

LBP AM’s Responsible Procurement Policy is based on the four pillars of the Responsible Procurement Policy of La Poste group, which are in accordance with LBP AM’s CSR pillars*, i.e.:

- PILLAR 1** Enforcing and promoting fundamental rights throughout supply chains
- PILLAR 2** Reducing the negative impact of our procurement and of our suppliers on the environment, and encouraging positive impacts
- PILLAR 3** Using procurement to promote social inclusion and to contribute to the development of the local and regional economic and social fabric
- PILLAR 4** Consolidating responsible and ethical relationships with our suppliers.

Procurers, business finders, users, and suppliers must monitor compliance with these pillars on a daily basis, as well as their application and promotion throughout the value chain. Their commitment is formalised herein and supplemented through the Group’s various Charters and Commitments.



* To find out more about our CSR policy: <https://www.lbpam.com/fr/our-identite/engagements-rse>



Pillars of the Responsible Procurement Policy

PILLAR 1

Enforcing and promoting fundamental rights throughout supply chains

PILLAR 2

Reducing the negative impact of our procurement and of our suppliers on the environment, and encouraging positive impacts

PILLAR 3

Using procurement to promote social inclusion and to contribute to the development of the local and regional economic and social fabric

PILLAR 4

Consolidating responsible and ethical relationships with our suppliers

PILLAR 1

Enforcing and promoting fundamental rights throughout supply chains

LBP AM pledges, on a daily basis, to promote fundamental rights and the best social practices and to combat forced and undeclared work.

LBP AM seeks out suppliers that comply with fundamental rights with the objective of:

- ➔ Instituting management practices, working conditions and remuneration policies that respect human dignity.
- ➔ Taking actions for preventing risks of violating such rights and mitigating them when they do occur.
- ➔ Being involved in sector initiatives targeting heightened transparency and enhanced fundamental rights of all their stakeholders on their supply chain.

LBP AM pledges, alongside its suppliers, to enforce the following principles:

- ✓ To comply with, promote, and implement the principles of the Universal Declaration of Human Rights, the United Nations Global Compact and its guiding principles, the OECD guiding principles, and the Declaration on Fundamental Principles and Rights at Work of the International Labor Organisation (ILO).
- ✓ To comply with legislation pertaining to working hours, remuneration, training, trade-union rights and freedom of association, and combatting illegal and undeclared work.
- ✓ To refrain from practicing any form of discrimination and to promote professional equality.
- ✓ To ensure that the service or product is performed or manufactured in conditions that comply with the fundamental rights of individuals and communities and that it is not hazardous to end-users.
- ✓ To support its suppliers in their efforts to improve in these areas.
- ✓ To take into account all the aforementioned thematics in its procurement decisions.

Suppliers are asked, in signing the Responsible and Ethical Procurement Charter:

- ▶ To commit to the aforementioned principles.
- ▶ To ensure compliance with these principles throughout their subcontractor chain.
- ▶ To conduct a social progress approach able to impact their entire sector of activity.

Binding performance objectives and indicators:

- 2024** That at least **75%** of eligible suppliers* have CSR approaches that promote compliance with fundamental rights.
- 2025
2026** That at least **80%** of eligible suppliers* have CSR approaches that promote compliance with fundamental rights.

* Eligible suppliers: suppliers chosen as part of a competitive bidding process or a request for tenders excluding monopolies and semi-monopolies

PILLAR 2

Reducing the negative impact of our procurement and of our suppliers on the environment, and encouraging positive impacts

Each good or service bought has an impact on the environment, either direct (from manufacturing a product from the use of natural resources until the end of its life) or indirect (for example, the purchase of software hosted on a remote server requiring constant energy consumption).

In accordance with Paris Agreement objectives and with the United Nations Global Compact and its environmental policy, LBP AM pledges:

- To seek out suppliers complying with the principles of environmental protection throughout their supply chains.
- To give precedence to long-lasting and environmentally friendly products and services from responsible suppliers.
- To seek out suppliers involved in sector initiatives seeking to transform the entire lifecycle of products and services on offer in order to address environmental and climate change issues and to adapt to climate change.

For this purpose, LBP AM pledges:

- ✓ To evaluate and challenge its business finders and users on their actual needs while urging them to exercise good judgement in use of energy and resources and offering innovative solutions (e.g., leasing, reuse, use of recycled and recyclable products).
- ✓ To analyse and shrink environmental impacts caused by the purchase of products and services throughout their lifecycle (design, production, transport, utilisation, end-of-life). For this purpose, to promote eco-design, reparability, and use of the circular economy by implementing the 3 Rs rule (reduce, reuse and recycle) and planning waste processing in advance.
- ✓ To take into account all the following thematics in its procurement decisions: reducing pollution (water, air, soil and noise) and greenhouse gas (GHG) emission; limiting consumption of resources and energy, and protecting biodiversity and ecosystems impacted by the activities of Group suppliers.

In addition, suppliers pledge to do likewise in their supply chain. For this purpose, they are asked:

- ▶ To shrink their carbon footprint, their consumption of resources, and their pressures on biodiversity.
- ▶ To enhance the energy performance of their products and services throughout their lifecycle by offering long-lasting and innovative solutions.
- ▶ To commit to a process of transforming their ecosystem.

Binding performance objectives and indicators:

- 2024** That **100%** of consultations that are part of a competitive bidding process or a request for tenders include an environmental criterion.
- 2025
2026** That at least **50%** of our eligible suppliers have an objective of reducing their GHG emissions with regards to their contribution to LBP AM's carbon emissions.

* Eligible suppliers: suppliers chosen as part of a competitive bidding process or a request for tenders excluding monopolies and semi-monopolies

PILLAR 3

Using procurement to promote social inclusion and to contribute to the development of the local and regional economic and social fabric

LBP AM has pledged to promote diversity, combat exclusions, and reinforce social and territorial cohesion throughout its supply chain in all territories in which it is located. For this purpose, LBP AM:

- Seeks out suppliers committed to the insertion of persons lacking easy access to the job market and that help develop the region in which they do business, particularly in vulnerable regions.
- Urges its suppliers to have a positive impact on inclusion in their geographical area.

These actions are taken in France with various organisations:

Social welfare structures: organisations in the sector of protected and adapted employment (STPA); structures in the sector of professional integration via economic activity (SIAE); other organisations of the social and solidarity-based economy (ESS) (associations, cooperatives, commercial companies with social usefulness, mutual insurance companies and foundations etc.); and all companies recruiting persons lacking easy access to the job market;

Structures that contribute to local and regional development: very small companies (TPE) and small and mid-sized companies (PME and ETI) that strengthen the economic fabric of regions in which they do business.

Particularly in vulnerable areas: companies doing business in priority urban neighbourhoods (QPV); and companies located in rural revitalisation zones (ZRR).

For this purpose, LBP AM pledges:

- ✓ To promote the development of partnerships with such structures.
- ✓ To support the creation of networking relationships and to facilitate the implementation of insertion initiatives.
- ✓ To facilitate understanding of the issue with partner companies.

LBP AM also encourages its suppliers to have a positive impact on inclusion on their subcontracting chain in their region:

- ▶ By assisting, themselves, persons lacking easy access to the job market.
- ▶ By contributing to the development of the regions in which they do business.
- ▶ By supporting the creation and development of virtuous entrepreneurial ecosystems throughout the process.

Binding performance objectives and indicators:

- 2024** That **100%** of consultations that are part of a competitive bidding process or a request for tenders include a social/inclusion criterion.
- 2025
2026** That at least **50%** of our eligible suppliers* are subjected to a review of their social inclusion policy.

* Eligible suppliers: suppliers chosen as part of a competitive bidding process or a request for tenders excluding monopolies and semi-monopolies

PILLAR 4

Consolidating responsible and ethical relationships with our suppliers

LBP AM pledges to implement partner-based, collaborative and balanced relationships with its suppliers, as part of a reciprocal framework of trust.

These commitments are to be met by LBP AM employees, and by its suppliers, who pledge, in turn, to apply them to their own subcontractors.

For this purpose, LBP AM and its suppliers pledge, throughout their value chains:

To act with integrity and respect

- ✓ To comply with the Group's policies for combatting corruption, and preventing conflicts of interest, gifts and invitations. To preserve independence in decision-making and actions, LBP AM tolerates no forms of corruption or influence-peddling, or any failure to comply the duty of integrity (based on three key principles of "Zero Tolerance, All Concerned, All Alert").
- ✓ To ensure equal treatment and equity in all structures.
- ✓ To ensure the confidentiality of information received and intellectual property.

To ensure transparency

- ✓ To promote the development of predictive management of procurements and orders
- ✓ To anticipate the end of commercial relationships with suppliers.
- ✓ To ensure that payment times are adhered to, in accordance with regulations.

To strike the right balance between financial and extra-financial aspects

- ✓ To apply and share their definition of responsible procurement by taking into account environmental, social and societal impacts alongside technical and financial aspects throughout the lifecycle of the procured product or service.
- ✓ To ensure that they do not knowingly create or accept disproportionate financial or human-resources offers or conditions that would be economically and socially non-viable for the supplier, or harmful to the environment.

To develop relationships for sharing good practices and mutual progress in managing market transformations

- ✓ To inform, train and enhance awareness of the environmental and social impacts of its procurements.
- ✓ To integrate assistance to suppliers in setting up roadmaps in these areas into the various key phases of its procurement process.
- ✓ To support positive social and environmental innovations policies through co-construction and networking initiatives. Then, to highlight the positive impact for LBP AM, its suppliers, its clients and society at large.

Binding performance objectives and indicators:

2024

That **100%** of employees are made aware of LBP AM's Responsible Procurement Policy.

**2025
2026**

That **100%** of persons who conduct a procurement act are trained in responsible procurement.

Our 2024-2026 commitments

	2024	2025-2026
PILLAR 1 Enforcing and promoting fundamental rights throughout supply chains	That at least 75% of eligible suppliers* have CSR approaches that promote compliance with fundamental rights.	That at least 80% of eligible suppliers* have CSR approaches that promote compliance with fundamental rights.
PILLAR 2 Reducing the negative impact of our procurement and of our suppliers on the environment, and encouraging positive impacts	That 100% of consultations that are part of a competitive bidding process or a request for tenders include an environmental criterion.	That at least 50% of our eligible suppliers have an objective of reducing their GHG emissions with regards to their contribution to LBP AM's carbon emissions.
PILLAR 3 Using procurement to promote social inclusion and to contribute to the development of the local and regional economic and social fabric	That 100% of consultations that are part of a competitive bidding process or a request for tenders include a social/inclusion criterion.	That at least 50% of our eligible suppliers* are subjected to a review of their social inclusion policy.
PILLAR 4 Consolidating responsible and ethical relationships with our suppliers	That 100% of employees are made aware of LBP AM's Responsible Procurement Policy.	That 100% of persons who conduct a procurement act are trained in responsible procurement.

Eligible suppliers: suppliers chosen as part of a competitive bidding process or a request for tenders excluding monopolies and semi-monopolies

IV

Defining pillars in procurement mechanisms

The LBP AM's Responsible Procurement Policy is expressed in its procurement process through operational mechanisms and action plans. It aims to integrate the four pillars presented in the various stages of the decision-making process (selection and choice of suppliers),

Likewise, this policy is part of a collaborative, engaged and responsible approach, and aims to be a mutual avenue of progress and innovation by associating the various stakeholders concerned, including the procurement finder, procurer, supplier and end-user.

The policy is expressed operationally as described below:

Supplier due diligence:



2024:

Evaluation of new suppliers based on the CSR questionnaire and La Banque Postale's Carte Afnor software.



Effective 2025:

Evaluation of suppliers with Ecovadis via the Hub de La Poste.

Contractualisation:



Sharing of LBP AM's Responsible Procurement Policy.



Signing of the Responsible and Ethical Procurement Charter.



Procedures in the event of non-compliance with the mechanisms provided

- LBP AM shall ensure that its suppliers are well aware of this Charter by having them sign it (at least electronically).
- LBP AM reserves the right to cease doing business with suppliers failing to comply with this Responsible and Ethical Procurement Charter.
- In the event of practices that violate this Responsible and Ethical Procurement Charter and that infringe on human rights, respect for persons or the environment, LBP AM reserves the right to alert the French Authority to Combat Discrimination and to Promote Equality (HALDE), the French Digital Freedoms Council (CNIL) and any other relevant authority.



LBP AM, a *société anonyme à directoire and conseil de surveillance* [joint-stock company governed by a management board and a supervisory board] with authorised capital of 12,138,931.20 euros.

Registered office located at: 36, quai Henri IV 75004 Paris, France.

Entered into the Paris Registry of Trade and Companies (RCS) under n° 879 553 857.

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