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SUPPLIER ETHICS CHARTER

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

Kaufman and Broad asks its suppliers and partners to respect this Charter in the context of their organization 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 pillars of the Kaufman & Broad Group's CSR strategy.

Kaufman & Broad affirms its commitment to the four principles set forth 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 this breach, lead to the application of the coercive measures provided for in the contract, which may, where applicable, go as far as the outright termination of the contract to the supplier's wrongs, 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 put in place an action plan to agree on corrective measures to be implemented and determine the conditions for maintaining contractual relationships.

BUSINESS ETHICS

• Anti-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 asks its suppliers that the negotiation and execution of contracts do not give rise to situations that can be qualified as active or passive corruption, influence peddling or, more generally, any breach of the duty of probity (embezzlement and favouritism).

In this context, Kaufman & Broad asks its suppliers not to offer its employees any advantage or gift that deviates from normal practices, which could impact decision making regarding the hierarchical position or function exercised by the employee,

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

- **Conflict of interest**

Kaufman & Broad undertakes to make every employee aware that any situation in which his or her personal interests (or those of a natural or legal person to which he or she is linked) could conflict with those of Kaufman & Broad must 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 commercial 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 making by a person other than the employee concerned.

- **Competitive practises**

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

WORKING CONDITIONS

- **Respect for Fundamental Rights**

The Group has signed the United Nations Global Compact on Human Rights, Labour Standards and the Environment and ensures compliance with the principles it defines, in particular the fundamental rights set out in 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 defined by the 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 combating discrimination**

The Group encourages diversity of profiles and career paths while respecting its non-discrimination commitments. The Group is committed to combating all forms of discrimination.

Kaufman & Broad asks its suppliers to combat all forms of discrimination.

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

The Group encourages individual employee expression, 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 combating illegal and concealed 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 on construction sites.

Kaufman & Broad asks its suppliers:

- Not to resort to illegal work
- Not to resort to concealed work
- Respect the applicable labour law

• **Working hours and level of remuneration**

Kaufman & Broad is committed to promoting the quality of life at work and personally by ensuring the compliance with 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 hours

• **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 various Group sites, in situations of travel or on worksites, in accordance with the current regulations.

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 construction worksites, and to make its employees aware of them if necessary. This attention must concern employees as well as temporary employees, employees of suppliers and subcontractors on worksites and more generally any person likely to be close to worksites and in particular local residents, or end users of construction.

ENVIRONMENT

Kaufman & Broad is committed to a process to reduce its environmental impact related to its activity, 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 the laws, regulations and environmental standards and contractual conditions (in particular the Low nuisance Building Charter, environmental certification, etc.) applied to protect the environment related to their activities.

• Continuous improvement and objectives

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

- Reduce carbon emissions from its business
- Preserving biodiversity and ecosystems
- Preserve natural resources (water, materials, etc.)
- Promote a circular economy and good waste management
- Avoid pollution and use non polluting products

Kaufman & Broad asks its suppliers to take environmental issues into account in the practice of their activities and to raise the awareness of its employees as necessary.

The Group invites its suppliers and partners to formalise environmental objectives, particularly through external bodies such as the Science Based Target Initiative.

DATA PROTECTION

Kaufman & Broad collects and uses data provided by its stakeholders in the course of its activity. The Group has undertaken to ensure the protection of this data, in accordance with European Regulation No. 2016/670 on the protection of personal data (GDPR) and to implement 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 confidentiality and data protection
- 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