



## Vendors / Publishers Charter

## **Introduction**

This Charter is intended to be a common frame of reference for the Kwanko team and our Vendors (including our Publishers of digital media), who are at the core of our business model.

This Charter is intended to take into account the changes and challenges of the industry, as Kwanko's and its partners' practices need to be reconsidered so that each party can fulfil its social and environmental responsibilities.

Kwanko intends to request all its partners to adhere to the present Charter, in the scope of the sustainable development of its commercial relations, quality standards and respect of CSR norms.

## **The Commitments**

### **Kwanko's commitment to its Vendors:**

- ✓ To build sustainable and profitable business relationships that respect working conditions, environmental protection, business ethics and human rights.
- ✓ To ensure constructive cooperation with the Vendor regarding its ability to meet its commitments
- ✓ Prevent and identify conflicts of interest in the relationship with Vendors

Train and sensitise Kwanko's Publisher Managers and Account Managers on CSR, Ethics and Anti-Corruption

### **Commitment expected from Vendors**

The Vendors are aware that their commitments are essential in the collaboration with the Kwanko Group, especially in terms of:

- ✓ Respect of the legislation
- ✓ Respect of ethical rules
- ✓ Respect of human rights
- ✓ Respect of working conditions respectful of the well-being at work,
- ✓ Protection of the environment
- ✓ Transparency, integrity and trust

## 1. Compliance with laws and regulations

We sign contracts with all our Vendors and in particular with the Publishers (the Terms are available on the Kwanko Platform, in the Entity Section, My Signatures).

Our Vendors and in particular our Publishers are committed to respecting at least the applicable legislation in force, in particular in terms of:

### ✓ Intellectual property

*[...] The PUBLISHER guarantees to KWANKO that he has all the rights, in particular intellectual property rights, necessary to put the content of his Channels (his website, his mobile applications or other delivery media) online, [...]*

### ✓ GDPR regulation

*[...] Each Party undertakes to comply with its obligations under current regulations applicable to the processing of personal data and, in particular, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 applicable since 25 May 2018. [...]*

### ✓ Charter of Direct Marketing activities

*[...] The Publisher warrants to KWANKO that it complies with the applicable data protection regulations and in particular that it has lawfully obtained the consent of the persons whose email addresses it uses in the context of emailing campaigns. [...]*

## 2. Adherence to the principles of transparency and ethics

Kwanko wishes to develop with its vendors and partners a relationship of trust based on the principles of CSR (Corporate Social Responsibility) and notably equity, integrity, honesty and transparency.

Each Vendor commits to adhere to the ethical principles of the Kwanko Group around the following major principles:

- i. the economic aspect, integrating growth objectives and economic criteria,
- ii. social responsibility, taking into account the objectives of equity, social cohesion and personal development of employees,
- iii. the environment, with the objective of preserving and protecting the environment and conserving the planet's natural resources.

Therefore, and more specifically regarding Business Ethics, Kwanko's Vendors commit to:

- ✓ Comply with the French "**Loi Sapin 2**" law of 9 December 2016 (or its equivalents in other countries such as the Bribery Act in the UK or the Foreign Corrupt Practices Act in the US) relating to transparency, the fight against corruption and the modernisation of economic life, and to put in place all the necessary actions to prevent and fight corruption or influence peddling.
- ✓ **Identify Anti-Competitive Practices:** An anti-competitive practice is behaviour that distorts, hinders or eliminates competition between companies
- ✓ More generally, to comply with all national and international standards in the fight against economic crime, including the financing of terrorism, money laundering, etc.

### 3. Social and human rights issues

At Kwanko, we consider our human capital to be a key factor in our success; therefore, respect for human rights is a fundamental part of our responsible business strategy and we expect all our vendors to adhere to it, especially in terms of:

- ✓ **Staff health and safety:** providing a safe and healthy working environment for all staff by applying the necessary safety instructions (training, setting up indicators to prevent accidents and occupational illnesses, proposing ergonomic workstations, implementing and enforcing the necessary hygiene and safety measures in the workplace)
- ✓ **Working conditions:** through proper application of the internal regulations and ensuring that employees have a work/life balance, clear working hours, remuneration corresponding to the hours worked, breaks and holidays and equal pay for equal work.
- ✓ **Career and training:** training all employees and ensuring that the remuneration policy is fair and in compliance with laws and regulations.
- ✓ Never engage in child labour, any form of modern slavery, forced, compulsory or clandestine labour, any form of physical, moral or sexual harassment, or any discriminatory practice related to origin, gender, sexual orientation, age, family situation, pregnancy, physical appearance, state of health, nationality, union membership, ethnicity or religion
- ✓ **Social dialogue:** Guarantee freedom of association with a trade union for all employees.

## **4. Environmental issues**

Kwanko is committed to the environment and has put in place several actions to reduce the consumption of energy, consumables (ink, paper etc...), and to improve the level of recycling of materials or other equipment used.

Similarly, we ask our Vendors to share the same values as the Kwanko Group and to commit themselves to:

- ✓ Respect the rules relating to the protection of the environment
- ✓ Optimise their waste management, water and energy consumption and preserve biodiversity.

## **5. Transparency of information**

Kwanko Group reserves the right to carry out audits through surveys in the form of questionnaire(s) to check the compliance of the Vendors with the commitments of the present Charter.

Kwanko asks its Vendors to commit to participate and to provide any document required by Kwanko as well as to share their good practices in terms of CSR.