



Responsible Purchasing Charter

Table of contents

1	Introduction.....	3
2	Objectives of the Charter.....	3
3	Monitoring and Responsibility	4
4	Governance and Responsibilities.....	4
5	Sword Group's Commitments to its Suppliers	4
6	Supplier Commitments Regarding Workers' Rights.....	4
6.1	Worker Safety.....	4
6.2	Combating Precarious Employment.....	5
6.3	Prevention of Human Trafficking	5
6.4	Prohibition of Forced Labour	5
6.5	Prohibition of Child Labour.....	5
7	Information Security and Generative AI.....	6
8	Monitoring and Compliance Mechanisms.....	6
8.1	Audits and Inspections.....	6
8.2	Supplier Training.....	6
8.3	Reporting and Remediation	6
9	Mutual Commitment.....	7



Revision history of the document

Version	Modifications	Date	Author	Approver
1.0	Objectives added	2025-06-19	Piotr CZARNAWSKI	Stéphanie DESMARIS
1.1	Security and Generative AI chapter added	2025-07-28	Marc LAMOUREUX	Andrew THOM

1 | Introduction

This Responsible Purchasing Charter aims to promote ethical, transparent, and sustainable relationships with our suppliers, freelancers, and subcontractors. It is based on the principles of international standards, notably the conventions of the International Labour Organization (ILO), the 10 Principles of the United Nations Global Compact, and the Universal Declaration of Human Rights.

It applies generally to the suppliers and subcontractors of the Sword Group. Each entity or branch of the Group adapts the scope of the Charter according to the nature of its activities and its supplier relationships.

2 | Objectives of the Charter

The Sword Group Responsible Purchasing Charter aims to:

- Share the Group's commitments with its suppliers, subcontractors, and freelancers, and ensure their involvement in a sustainable development approach.
- Guarantee compliance with applicable laws and regulations in each country, highlighting ethical and social responsibility principles.
- Promote fair and transparent business relationships while preventing risks related to ethics, human rights, and the environment.
- Encourage continuous improvement through active collaboration between Sword Group and its partners.
- Integrate environmental, social, and ethical criteria into its supplier selection and evaluation processes.
- Strengthen the skills of the Purchasing teams on sustainable development issues through awareness-raising and internal training initiatives.

To reinforce the effectiveness of this approach, Sword Group sets itself the following objectives:

- Systematically integrate CSR criteria into tenders and framework contracts,
- Achieve evaluation of 80% of strategic suppliers against CSR criteria by 2030,
- Deploy a responsible supplier charter in all countries where the Group operates, to be signed by all new partners,
- Favour relationships with suppliers committed to environmental, social, or circular economy practices,
- Carry out annual monitoring of suppliers' CSR performance, implementing improvement plans where necessary.

3 | Monitoring and Responsibility

The implementation of this charter is overseen by the Sword Group Governance Committee. This committee ensures compliance with commitments, deployment to stakeholders, and the continuous improvement of the responsible purchasing approach.

It is also responsible for monitoring the operational objectives defined in this charter, the international rollout of the responsible supplier charter, and the evolution of improvement plans established following assessments.

4 | Governance and Responsibilities

This charter is reviewed annually, under the supervision of the Governance Committee.

5 | Sword Group's Commitments to its Suppliers

Sword Group undertakes to:

- Develop sustainable and fair business relationships that address risks and issues related to working conditions, environmental protection, and business ethics.
- Maintain constructive and open dialogue with its suppliers to support them in respecting ethical and social responsibility principles.
- Select its suppliers and subcontractors through an impartial and transparent purchasing process, based on predefined criteria.
- Raise awareness among its employees of ethical principles and corporate social responsibility (CSR).
- Anticipate and manage any potential disengagement progressively, to avoid situations of economic dependency.

6 | Supplier Commitments Regarding Workers' Rights

6.1 Worker Safety

Suppliers undertake to:

- Guarantee a safe and healthy working environment, in accordance with local laws and international standards,
- Regularly assess health and safety risks,
- Provide their employees with appropriate personal protective equipment (PPE),
- Train employees in best safety practices and prevent workplace accidents and occupational illnesses.

6.2 Combating Precarious Employment

To promote stable employment, suppliers must:

- Limit the use of short-term contracts or subcontracted work where this could result in job insecurity,
- Provide transparent contracts clearly stipulating working conditions and employees' rights,
- Implement fair practices to sustainably integrate workers into the supply chain.

6.3 Prevention of Human Trafficking

Suppliers must take proactive measures to prevent all forms of human trafficking:

- Ensure that all workers are employed voluntarily and without coercion,
- Establish due diligence processes to detect and eliminate any form of trafficking in their own supply chains,
- Provide a confidential channel for reporting any incident or suspicion.

6.4 Prohibition of Forced Labour

In accordance with ILO conventions, suppliers undertake to:

- Refrain from the use of forced or compulsory labour, whether physical or psychological,
- Ensure that workers are not forced to remain in employment by withholding documents or non-payment of wages,
- Respect workers' freedom to leave their employment in accordance with their contracts.

6.5 Prohibition of Child Labour

Suppliers must comply with the following provisions:

- Not employ children below the legal working age as defined by local laws and international conventions,
- Ensure that young workers (aged 15 to 18) are not exposed to hazardous conditions or anything detrimental to their education,
- Establish verification procedures to prevent any involvement in child labour.

7 | Information Security and Generative AI

Sword takes cybersecurity and data protection seriously, recognising both as fundamental foundations of our digital services. Sword adheres to internationally established security standards and best practices acknowledged through our ongoing accreditation in both ISO 27001 and Cyber Essentials Plus.

Sword will conduct a risk-based security risk assessment of suppliers as part of the onboarding process and periodically thereafter. Suppliers will comply with the following principles and policies in place:

- Information Security Principles and Objectives
- Risk Assessment and Management
- Access Control
- Network Security
- Data Protection
- Incident Response
- Business Continuity and Disaster Recovery
- Security Culture including Awareness and Training
- Compliance and Auditing
- Information Security Policy
- Generative Artificial Intelligence Usage Principles

8 | Monitoring and Compliance Mechanisms

Sword Group implements rigorous methods to ensure compliance with this charter:

8.1 Audits and Inspections

- Conducting regular audits of suppliers to assess compliance with the principles of the charter,
- On-site inspections to verify working conditions and safety standards.

8.2 Supplier Training

- Organising training on human rights, workplace safety, and ethical standards,
- Providing resources to help suppliers improve their practices.

8.3 Reporting and Remediation

- Establishing anonymous reporting channels to enable workers to report any violations,
- Developing corrective action plans in the event of non-compliance.

9 | Mutual Commitment

Sword Group and its suppliers undertake to:

- Foster constructive and transparent dialogue,
- Adopt a shared responsibility approach to prevent violations and improve practices throughout the value chain.

COMMITMENT OF BOTH PARTIES

Sword Group undertakes to comply with this Responsible Purchasing Charter for Suppliers / Subcontractors / Freelancers and to promote transparency and dialogue with its partners.

Name of representative |

Signature |

Date |

The partner acknowledges receipt of this charter and undertakes to comply with its principles.

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Name of partner |

Name of representative |

Signature |

Date |

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Sword Group | 2 rue d'Arlon L-8399 Windhof - Luxembourg
SE au capital de 9 544 965 € - B168244



contact@sword-group.com