

CODE OF ETHICS AND CONDUCT

Auchan Portugal

2015

MESSAGE FROM GENERAL DIRECTOR

Dear Partner,

Auchan Portugal has always been a **company committed to the principles of ethical and responsible management**. For us, this commitment means establishing rewarding, fair and balanced relationships with all our stakeholders.

We have had an internal Code of Conduct and an Ethical Trading Code since 2005 to guide our business relations. Following our social responsibility certification according to the SA8000 standard in 2006, we have been working to increase our stakeholders' involvement in these principles.

In light of the current context and the need to increase involvement as a company throughout the value chain, with ethical, responsible principles, we have included a key field of action in our "Vision for 2020": the introduction of this **new Code of Ethics and Conduct, in which we clearly undertake our commitments to our stakeholders**.

Nonetheless, **our partners' commitment to taking on the underlying principles of this Code and putting them into practice is essential** in this relationship.

At Auchan, we believe that this is the only way for us to be a respected company that inspires confidence, retains the best employees and partners and is able to build its future.

We also believe that **only by making a joint effort with partners that work with the same values will we be able to ensure the sustainable development of our value chain**.

We challenge you join us in following this Code and build a better future, in which both of us have a role to play.

I hope I can count on you. You can count on us.



Américo Ribeiro
(General Director)

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Comentário [T1]: Faltava este ponto no Índice do documento em português

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Introduction

Our **Mission**:

Improving the purchasing power and quality of life of the greatest number of customers with responsible, professional, passionate, valued employees.

Our **Values**:

Trust: Establishing trusting relationships between customers, employees and the Company.

Sharing: Sharing knowledge, power and success, encouraging teamwork and effective synergies.

Progress: Constantly seeking economic and social progress with enthusiasm and improved trade, with a view to providing continuity.

Our **Vision**:

In 2020, Jumbo will be the preferred choice in its area of influence, thanks to:

Its leadership in discount business;

Its distinguishing range of products and services;

Its close relationship with customers;

Its cross-channel solutions;

Its responsible, enterprising, motivated team of professionals;

Being a responsible company.

Because we are daring business people who guarantee successful growth for the Company.

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Groupe Auchan is a federation of autonomous, responsible companies that aim to achieve sustained development by developing their business around a common mission. The Company is majority owned by the Mulliez Family Association and the Company's employees.

As a multinational company, *Groupe Auchan* expresses its convictions, values and commitments regarding ethics in its "*Chartre Éthique de Groupe Auchan*" (at www.groupe-auchan.com), which guides and motivates its operations in the different countries.

Comentário [T2]: Embora não encontre a Carta, creio que será "Charte Éthique", ao menos parece ser a expressão mais corrente.

Based on the *Groupe's* document and the Company's set of values, with extensive adaptation to Portugal's business culture, Auchan Portugal ("Auchan") aims to make its business stand out and undertakes its commitments.

With this in mind, and to maximise its contribution to sustainable development, the Company guides its action using its **10 Principles of Ethical and Responsible Management**:

1. Accountability and transparency;
2. Ethical conduct and respect for stakeholders' interests;
3. Respect for the rule of law;
4. Respect for human rights;
5. Respect for customers;
6. Responsible trade;
7. Responsible employment;
8. Solidarity and social intervention;
9. Protection of the environment;
10. Innovation and constant improvement.



Every day, Auchan works with these principles in mind to act as a responsible company for its employees, customers, suppliers and partners, for the environment and for society as a whole.

Scope of application and goals

This Code of Ethics and Conduct **applies to all employees of Auchan Portugal Hipermercados S.A. and other companies that belong to Auchan Portugal, S.A., and to people and companies that provide services regularly or occasionally**, specifically: suppliers, subcontractors, service providers, sub-suppliers, and partners. This includes companies to which Auchan provides services or products that act under the aegis of Auchan brands.

This Code of Ethics and Conduct aims to **formalise the Company's actions** in its good governance, in guiding the day-to-day conduct of its employees in the workplace and in the ability to influence third parties' behaviour. Auchan's relationship with shareholders and official bodies also follows the principles and rules established in this document.

This Code aims to **reinforce the law**, policies and regulations of the sector and the Company. It aims to be a set of **guidelines to help all employees** answer their questions and concerns when working. Finally, its goal is to **involve all stakeholders in a set of common commitments** to work towards a fairer and more developed society.

This document also serves to **strengthen the Company's commitment**, above all in terms of United Nations Global Compact Principle 10, endorsed by the Company, which relates to the fight against corruption. It also enhances the practices encouraged by the management systems implemented (the Social Responsibility Management System, SA8000; the Environmental Management System, ISO 14001, and the Service Management System in accordance with the technical specification "Manufacturing and Marketing Services of Fresh Products at Auchan Portugal Hipermercados").

It also responds to:

- The principles of the ISO 26000 standard;
- The 1948 Universal Declaration of Human Rights;
- The ILO Declaration on Fundamental Principles and Rights at Work;
- The OECD guiding principles on these matters.

As a result of the evolution of operations and society, this document will be amended whenever the Company deems necessary.

I. Good governance: our commitments

1. Ethics and transparency

Auchan Portugal and its employees care about having **anti-corruption** practices, encouraging **social responsibility and transparency in the value chain**, practising **fair competition**, respecting **property rights** and having **responsible political involvement** to benefit society in general.

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1.1. Banning acts of corruption

- a) Auchan employees are prohibited from committing any acts of bribery.
- b) At Auchan, any acts or behaviour involving fraud, manipulation, illegal or dishonest schemes created for personal or Company gain shall not be tolerated.
- c) Influence peddling, taking advantage of an advantageous position in the Company or connections with persons in positions of authority to gain favours or benefits are not permitted.
- d) Auchan prohibits embezzlement and the improper use of funds or assets for personal use.

1.2. Encouraging social responsibility and transparency in the value chain

- a) Auchan incorporates ethical, social, environmental, health and safety criteria, and the requirements contained in the SA8000 standard in its procurement and contracting policies and practices with all suppliers, partners, service providers, subcontractors, and sub-suppliers.
- b) Auchan aims to include best practices observed by external bodies and organisations, and encourages other organisations to adopt similar policies.
- c) Auchan aims to ensure the due diligence of its products and services with a wide-reaching, pro-active effort to identify risks throughout the life cycle of the products it sells and the services it provides, attempting to avoid and mitigate those risks.
- d) Auchan performs audits and follow-ups (using samples and according to risk analyses) to check the commitments undertaken by suppliers, partners, service providers, subcontractors, and sub-suppliers to draw up action plans to correct and prevent risk situations.
- e) As part of principle of transparency and accountability, Auchan agrees to be audited by its stakeholders whenever agreed beforehand and will encourage the sharing of best practices among companies, to which it will make an active contribution.

1.3. Practising fair competition

- a) Auchan has a set of procedures for safeguarding against anti-competitive behaviour and encourages its employees to be aware about the importance of these practices.
- b) Auchan supports antitrust and anti-dumping practices.

1.4. Respect for property rights

- a) Auchan undertakes to establish practices and procedures to properly ascertain the ownership of property it wishes to use, such as: physical and intellectual property, interests in land or other physical assets, copyrights, patents, funds, moral rights, and others.
- b) Auchan undertakes to pay fair compensation for the property it acquires or uses.

1.5. Responsible political involvement

- a) Auchan has responsible political involvement to benefit society in general and maintains transparency in the policies it follows, requiring its employees to behave in line with this practice.
- b) Auchan does not directly or indirectly contribute to political parties, movements or candidacies in any way that may suggest an attempt to control or could be understood as exercising undue influence over politicians or those involved in governing in favour of specific causes.
- c) Auchan establishes guidelines for people who express positions and content on behalf of the Company.

1.6. Loyalty to shareholders

- a) Auchan guarantees reliable, legal financial and non-financial reporting to shareholders, and ensures that they are consulted and involved.
- b) Auchan guarantees that every effort is made to ensure due return for its shareholders, and involve all employees in the goal of perpetuity.
- c) Auchan uses the proper, necessary methods to preserve the shareholders' entire investment, and guarantees employees' dedication.

2. Responsible employment

Auchan's human resource policy guidelines include **respect for human rights and the adoption of socially responsible labour practices, exercising due diligence and taking the steps necessary for improvement.**

Since 2006, Auchan has had a Social Responsibility Management System certified by the SA8000 standard. The main framework of this system is to safeguard human rights and guarantee the development of ethically accepted working conditions. The SA8000 standard is based on international human rights conventions and labour laws in each country that protect employees at organisations and all those in their spheres of influence.

By implementing the Social Responsibility Management System, real and potential impacts on human rights as a result of the Company's operations and those with which it has relationships are identified and averted.

The certification, as well as reinforcing the entire Company's commitment to the management model, encourages responsible employment and makes it possible to manage social risks together with human resources, suppliers, subcontractors, partners, service providers and sub-suppliers. It does this by monitoring indicators, generating evidence and implementing improvement actions that aim to obtain commitment from all parties to implementing social responsibility within the Company and, as a result, compliance with the SA8000 standard.

2.1. Compliance with the requirements of the SA8000 standard

1. Auchan does not support or use:
 - a) Child labour;
 - b) Forced or slave labour;
 - c) Any form of discrimination.
2. Auchan offers all employees:
 - d) Safeguards for treatment with dignity, respect and equality;
 - e) Safe and healthy conditions in all workplaces;
 - f) Safeguards for fair remuneration;
 - g) Compliance with national regulations and sectorial agreements on the maximum number of *working hours*;
 - h) The right to freedom of association and the right to collective bargaining.
3. Auchan has created a management system to oversee and analyse all the aspects mentioned above and to improve practices and indicators.
4. The Company promotes these requirements in its value chain and views the progressive adoption of these values as a condition for establishing a relationship.

2.2. Human resource policy

To meet the requirements of the SA8000 standard and guarantee the Company's values, the human resource policy ensures:

- a) Appreciation of diversity and innovation;
- b) Skill development through training;
- c) A demanding, rewarding evaluation and award system that prioritises internal promotion;
- d) Management that is simple, near at hand, and responsible.

3. Responsible trade

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Auchan is a company that trades responsibly. To achieve this mission, Auchan's operations are based on guaranteeing the quality of its solutions, practising the lowest price in the market, providing a range of products and services suitable for all its customers' needs, encouraging healthy, responsible consumption, and providing reliable information about the products and services available with constant support and input from customers.

3.1. Quality: an Auchan priority

- a) The quality policy applies to the entire Company and involves all employees. Its main goal is to provide products and services that ensure the safety, health, trust and satisfaction of all the customers that visit the Company every day.
- b) As regards Auchan's own brands, supervision is even stricter due to the Company's responsibility for its brands, from investigating and developing products to producing and selling them.

3.2. Price: the Auchan guarantee

Auchan provides the best solutions for its customers, guaranteeing the lowest prices to attempt to satisfy consumer needs and provide accessibility to all.

3.3. Listening to our customers and customer satisfaction

- a) Auchan acts to provide customers with the best service and to resolve any complaints made. To monitor customer satisfaction and constantly improve the service provided, the Company has programmes and procedures to identify needs and introduce improvement measures.
- b) Auchan guarantees the privacy and protection of customer data to retain credibility and customers' trust.

3.4. Purchasing: a fair, transparent process

- a) To provide a better range of products and services at the best price to all its customers, Auchan maintains a close relationship with upstream stakeholders that is sustainable and beneficial for all involved;
- b) In particular, payment deadlines agreed or legally established should be met by all those involved in Auchan negotiation or procurement processes.

3.5. Encouraging healthy and responsible consumption

- a) Using its different sales channels, Auchan stands out in the market thanks to a wide range of products and services that meets customers' needs every day, doing so with quality and respect for the environment and encouraging healthy lifestyles regardless of purchasing power.
- b) Auchan helps develop the national economy and regional economies. The Company favours local and national suppliers and guarantees a balanced, sustainable relationship.
- c) Auchan believes that avoiding waste is needed and sees it as a duty. It seeks to reduce waste in its operations and by offering customers and employees solutions to constantly reduce it.

3.6. Information about the Company and its products and services

- a) Auchan communicates with customers using fair, non-aggressive marketing. It transmits factual, impartial information that can be understood by customers and guarantees that product and service characteristics are comparable. This enables customers to make informed decisions about consumption and purchasing.
- b) Reliable information about the Company's operations should be considered in the channels regarded as official by the Company.

4. Preservation of the environment and involvement in the community

4.1. Managing environmental impact

a) Auchan undertakes to meet legal requirements and constantly improve its environmental performance by incorporating environmental management into its overall management.

b) In this field, the main fields of action are: preventing pollution; using resources efficiently; training employees; involving suppliers, partners, service providers, subcontractors, sub-suppliers; raising customer awareness by encouraging sustainable consumption and protecting biodiversity.

c) Auchan respects and encourages the following, as environmental principles:

- Environmental responsibility: as well as complying with laws and regulations, Auchan takes responsibility for its operations' impact on the environment. It acts to improve its own performance and the performance of others in its sphere of influence;
- Principle of caution: whenever there is a threat of serious or irreversible damage to the environment or human health, a lack of complete scientific certainty shall not be used as a reason for delaying effective measures to stop environmental degradation or damage to health;
- Environmental risk management: implementing programmes based on risk and sustainability to assess, avoid, reduce and mitigate environmental impact and risks;
- Polluter pays principle: in which the aim is to keep the costs of pollution in the Company and to quantify the economic and environmental benefits of preventing pollution.

Auchan uses the following approaches and strategies in its environmental management operations: the life cycle approach, environmental impact assessments, implementing cleaner and more eco-efficient operations, using technologies and practices that are safe for the environment, sustainable purchases, learning, and raising awareness.

4.2. Relationship with the community

One of the principles that define Auchan's operations is extensive involvement in the communities around its shops. Auchan contributes to development and helps improve living standards in local communities in the following ways:

a) Through proactive intervention and involvement in the community, particularly via the Jumbo Foundation for Young People (*Fundação Jumbo para a Juventude*), supporting social solidarity institutions that encourage development and protection for children and young people that have difficulties;

- b) By promoting campaigns for collecting goods and raising funds which are participated in by the Company, customers, employees, suppliers and partners;
- c) By investing in local entrepreneurship and socio-economic development programmes;
- d) By encouraging volunteering, in which Auchan's human resources participate, to ease or overcome shortfalls in the local community, stimulating its spirit of solidarity and mutual assistance as well as its personal enrichment;
- e) Raising awareness and educating youngsters about topics related to sustainable development and health through the enhancement and actions of Club Rik&Rok.

II. Good conduct in the workplace: employees' responsibilities —

Auchan employees, when carrying out their work, actions and duties, should behave bearing in mind the Company's interest. They should act in line with Auchan's mission, values and principles of ethical and responsible management. To do so, their behaviour should be governed by the following rules, taking into account that the Company undertakes responsible human resource management.

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1. Norms of behaviour to guide employees' work

1.1. Integrity and honesty

- a) Employees shall carry out their work honestly and professionally, respect the Company's values, principles and internal procedures and the legislation in force in all areas of business.
- b) When working, and by using the resources available, employees shall guarantee reliable accounting, financial, fiscal, environmental, quality, safety and human resource records that are available and up to date.
- c) Employees shall not use failures in management systems for personal benefit and they shall help identify any such failures.

1.2. Responsibility

- a) Employees shall take responsibility for their actions at all times and demonstrate dedication when performing the tasks entrusted to them. They shall continually seek to improve and update their knowledge and work-related skills.
- b) Mistakes are permitted as important moments for learning or innovating, but employees should make every effort not to repeat them.

1.3. Trust

- a) Employees shall maintain a relationship of complete and full trust between colleagues, the Company and partners.
- b) They shall honour their commitments, believe in people's word and undertake their responsibilities.

1.4. Respect for others

- a) Employees shall maintain and cultivate proper relations and cordial conduct between them to develop a solid spirit of cooperation and cohesion, making use of all their skills to perform the actions entrusted to them, and using loyalty to the Company and colleagues.
- b) They shall respect the inherent value of every individual regardless of sex, marital status, training, physical or mental disabilities, caste, nationality, race, religion, sexual orientation, political affiliation or union membership.
- c) They shall encourage a respectful, safe environment in every workplace, free from discrimination or harassment of any kind.

1.5. Loyalty

- a) Employees shall have honest, dedicated behaviour at all times when working, and respect commitments to other employees, hierarchical superiors and to the Company itself. They shall endeavour to safeguard their prestige, professionalism and credibility and always act in accordance with the law.
- b) They shall refrain from making or repeating statements or conducting themselves in a way that could damage the image of Auchan, its employees or partners in the eyes of others, except when necessary in order to exercise rights in an appropriate official setting.
- c) They shall be aware of each person's individual responsibility in building and implementing the commitments of the Company and its brands and, based on the results, they shall act responsibly to perform their duties.

1.6. Care and diligence

- a) Employees shall perform their work carefully and efficiently and shall strictly respect the responsibilities and duties that are requested of them by their hierarchical superiors. They shall be accountable to hierarchical superiors for not respecting such responsibilities and duties.
- b) They shall be thorough when working, care for Company assets and property, and avoid unnecessary expenditure.
- c) Working under the influence of drugs or alcohol is prohibited. Working in conditions that do not guarantee the health, hygiene and personal presentation necessary to perform work in a commercial setting, in accordance with Company procedures, is also prohibited.
- d) Employees shall make every effort to satisfy customers' needs and ensure the safety of the products and services provided by Auchan.
- e) They shall propose improvements and innovation even outside their field of action.

2. Relationship with business partners and third parties

- a) Auchan employees are strictly prohibited from requesting or accepting any type of bonus, payment, gift, favour or other personal benefit from customers, suppliers or others, and they should fully comply with Company regulations on gifts;
- b) Similarly, employees should not gain personal advantage by acquiring products or services from partners with whom they have a working relationship, nor should they use Company property or resources for personal benefit;
- c) Employees should act openly and transparently, free from corruption, and should not pay any bribes or influence partners' decisions by any illegal means.

3. Conflicts of interest

- a) Employees cannot perform any kind of professional activity outside the Company that interferes with their duties or Company operations, unless authorised to do so in accordance with the law.
- b) Any employee, when faced by the need to make a decision related to his/her status as employee and/or related to the Company, in any process that also includes his/her own interests or the interests of others with whom he/she has or has had a connection through a family relationship, affinity or close contact, should immediately inform his/her hierarchical superiors about that connection.

4. Protecting the Company's assets

- a) Auchan and its employees should ensure that the Company's physical, financial and intellectual property are protected and preserved, and they should not use any Company assets, services or rights for their own benefit or the benefit of others.
- b) Using Auchan equipment and resources, including communication channels, for personal ends should be avoided beyond situations in which it is strictly necessary. The internet cannot be used to send or receive messages that contain offensive content or inappropriate images, nor should it be used for recreational or personal purposes unless strictly necessary.
- c) In the event of a contingency situation in which the Company's operations could be compromised, employees should act in accordance with the provisions of the relevant plans and be aware that their behaviour has a greater impact on safeguarding Auchan.

5. Processing information

5.1. Privacy and confidentiality

- a) Employees should keep facts and information of which they become aware when working confidential, even once they have stopped working for Auchan or their connection with the Company has ended. This is particularly important for matters that, due to internal decisions or legal impositions, require it to be kept as such.
- b) They should also respect the existing Company rules on confidentiality and the flow of information, especially in relation to economic information to which they have access.
- c) Employees should abstain from using any type of information about matters regarding the Company, colleagues, customers, suppliers or partners. The information to which they may have access should be used only in the Company's own interests and/or when expressly authorised by the Company.
- d) They should refrain from using their position as Auchan employees in contexts outside the Company if such usage goes against the Company's interests.
- e) The use or transmission of Company information to the public outside the Company can only take place when authorised.
- f) Employees should take special care with privacy and confidentiality when dealing with massive, rapid channels of dissemination such as the internet, and they should ensure compliance with the Company's best practices.

5.2. Public statements

- a) All Auchan employees should inform their hierarchical superiors about any issues they are asked about by people connected to the media and they should refrain from making any public statements or publicly expressing their personal opinions on matters related to the Company's operations, unless they have express authorisation to do so.
- b) Similarly, presentations at conferences, congresses or seminars made by employees who do so in that role or identified as such should be authorised beforehand by the hierarchical superior with delegated powers to do so.

6. Quality, health, safety and environment

- a) Employees should be aware of food safety and quality rules and policy and they should seek to guarantee compliance with them within their area of responsibility. They should also inform the hierarchical superiors responsible about any situation that may jeopardise the policy, even if it is outside their scope of work.
- b) Employees should ensure that they know the Company's Environmental Policy and Environmental Management System and that they are able to identify where they should act to reduce their shop's environmental impact. They should refrain from acts that do not encourage better environmental performance.
- c) As the health, safety and well-being of employees are a priority for Auchan, they should all know, comply with and enforce the rules on health and safety at work, and they should report any non-compliance.

7. Responsible leadership

- a) Hierarchical superiors should set an example of compliance with these rules and should organise training, explanation, follow-up and evaluation in their teams.
- b) With a view to continual improvement and transparency, they should also ensure participatory management, in which all contribute with suggestions and/or concerns.

8. Reporting situations and observations

Employees should report any behaviour that goes against this Code of Ethics and Conduct. Confidentiality and legal protection are guaranteed to those who report non-compliance, in accordance with specific regulations, and fair treatment is guaranteed to those reported.

III. Involvement of the value chain

Comentário [T3]: Os últimos três números não estavam coerentes com os dois anteriores e o índice (devendo ser III, IV e V respetivamente). Rectifiquei na tradução.

1. Adherence to the principles in this Code

Ethical conduct is fundamental in order to establish and maintain legitimate, productive and long-lasting relationships between organisations. To prevent corruption, adhere to ethical rules and ensure responsibility and transparency in the supply chain, Auchan encourages all its suppliers, service providers, subcontractors and partners to subscribe to this **Code of Ethics and Conduct by signing a Letter of Commitment**.

These rules establish the social responsibility requirements in accordance with the SA8000 standard, as well as the commitment to contribute to sustainable development under the principles of ISO 26000 and the Global Compact.

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2. Mutual evaluation of compliance

By entering into a business relationship with Auchan, all should commit to aligning their actions with the principles in this Code, especially those relating to the fundamental topics of **good governance**. Auchan is committed to these norms of behaviour and requests that its partners do the same and that they accept to mutually audit one another.

3. Evaluation actions

3.1. For the purposes of analysis and evaluation, Auchan performs annual audits. The aim of these audits is to check compliance with all the requirements of SA8000 by its suppliers, subcontractors, service providers and partners. It also encourages participation in actions to perform monitoring, identify causes and implement corrective and preventive action to remedy any non-compliance relating to these requirements.

3.2. Despite these evaluations, particular attention is paid to:

- a) Subcontractors, because they work at Auchan premises;
- b) Partners that act under Company brands or produce for them;
- c) Suppliers identified as having the greatest risk in the assessment;
- d) Social conditions for manufacturing and work in the supply chains.

4. Consequences of not complying with the commitment

Auchan shall not maintain business relationships with those who do not comply with these requirements, especially the requirements of the SA8000 standard and ethical and responsible management in general.

IV. Internal management of ethics and responsibility

1. Organisation

The *Groupe Auchan Portugal* governance model includes a body that is responsible for supervising, monitoring and implementing ethics and responsibility strategies in the Company management: the Committee for Ethics and Responsibility.

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This means the senior management takes responsibility for:

- a) Incorporating the 10 Principles of Ethical and Responsible Management in their everyday management of the Company and the decision-making process;
- b) Enforcing this Code of Ethics and Conduct;
- c) Identifying risks and improvements to be made;
- d) Encouraging the involvement of all stakeholders.

2. Involvement, training and information for all stakeholders

1. Auchan should take all the necessary steps to train its employees and inform stakeholders of the principles included in this Code of Conduct and Ethics.

2. Suppliers, service providers, partners and subcontractors should keep their subscription to the Code of Ethics up to date. Careful selection should be made in accordance with the principles in this Code. Auchan should assess how it can help develop these principles at its partner SMEs.

3. The recruitment, promotion, evaluation and remuneration of employees should take the principles in this Code into consideration.

4. Employees should be the main ambassadors of this Code and accordingly any violations will lead to disciplinary action at the designated places.

3. Listening to stakeholders

1. Auchan undertakes to listen to its stakeholders and keep accessible, safe channels open to collect concerns and report situations of non-compliance with this Code. The channels are confidential and pose no risk of reprisal for those that use them.
2. Auchan should raise awareness and encourage partners, subcontractors and suppliers to communicate any violation of these principles internally.
3. To do so, Auchan provides stakeholders with a way of reporting and complaining about non-compliance by stakeholders themselves, by their employees or by other partners:
 - a) Employee Alert Line (*Linha Alerta Colaborador Auchan*): this type of general reporting includes a free post-box and an internal email address (linhalerta@auchan.pt). Anonymity is guaranteed for those who want it;
 - b) Partner Alert Line (*Linha Alerta Parceiro Auchan*): this type includes a free post-box and, if necessary, anonymity can be granted. It is designed for reports of possible non-compliance with the law in the decisions and conduct of the Company, its employees and partners.
4. Confidentiality and protection for the those making reports is guaranteed in these forms of alert, and all alerts shall lead to examination and assessment by the management.

Linha Alerta Colaborador Auchan,

Remessa Livre 3172

1303-960 Lisboa

Linha Alerta Parceiro Auchan

Remessa Livre 3172

1303-960 Lisboa

4. Internal oversight, keeping records and monitoring

- a) Auchan shall have an effective supervision system to fight corruption and any unethical behaviour that goes against the principles described in this Code.
- b) Auchan should establish a set of indicators for regular oversight and reporting in non-financial reports.

5. Transition plan

- a) All Auchan employees shall receive training on this Code, which will be an integral part of employment contracts.
- b) All suppliers shall sign this Code. For existing suppliers, the Code shall be signed during the period designated. When it is published, everyone shall receive all the necessary information for clarification.

V. Glossary

Accountability: Willingness and ability to be held accountable for decisions and operations by the organisation's governing bodies, legal authorities and, in general, its stakeholders.

Comentário [TF4]: Talvez esta entrada seja repetitiva, tendo em conta a de "Responsibility and accountability" abaixo.

Child labour: Any work performed by a child younger than the ages specified, except as provided for by ILO Recommendation 146. [Adapted from SA8000:2008]

Company mission: The Company's mission allows whoever works for it and the surrounding society to know its reason for existing and the values and principles it follows in order to guide behaviours and define objectives. [Adapted from the Self-Assessment Guide on Gender Equality in Companies]

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Company values: values are the benchmarks that influence the organisation's principles, culture, decisions and actions. [Portuguese Standard on Social Responsibility 4469-1 2007]

Conciliation between professional, family and personal life: Condition that allows both men and women to exercise their professional activities without damaging their family responsibilities and their rights and obligations as citizens. [Adapted from Self-Assessment Guide on Gender Equality in Companies. Lisbon: DSIE/CITE, 2008, p. 57]

Comentário [T5]: Existe uma tradução inglesa deste texto, do qual esta é uma citação directa, mas tem um erro gramatical que quis reproduzir aqui. Por isso, acrescentei o "adapted from".

Corruption: "The abuse of entrusted power for private gain"; can be performed by individuals or organisations. In the Guidelines, corruption includes practices such as bribery, facilitation payments, fraud, extortion, collusion and money laundering. It also includes offering or receiving any type of gift, loan, fee, reward or other advantage from/by any person as an incentive to do something dishonest, illegal or that breaches trust in the Company's business conduct. This can include gifts that are not money, such as goods or free trips, or special personal services provided with the aim of gaining undue advantage or that lead to moral pressure to receive such an advantage. [Global Reporting Indicators vr4]

Comentário [T6]: Não sei a que se refere isto. É o Global Reporting Initiative?

Due diligence: Proactive, wide-reaching process to identify the real and potential negative economic, environmental and social impacts and risks of the organisation's decisions and operations throughout the life cycle of an organisation's project or operation, with the aim of avoiding or mitigating such negative impacts or risks.

Dumping: An unfair competition practice in which the company sells its product or service for a price that is much lower than the fair price for a certain amount of time with the aim of harming and eliminating competing companies in order to dominate the market and impose high prices; [Adapted from - Glossary of Ethos Indicators for Sustainable, Responsible Businesses] or *vide* Decreto-Lei n.º 166/2013 de 27 de December from Portuguese Republic, concerning measures applicable to individual restrictive trade practices.

Ethical conduct: Behaviour in accordance with the accepted principles of good and proper conduct in a specific situation that is consistent with international norms of behaviour.

Environment: The natural surroundings where an organisation operates, including the air, water, soil, natural resources, flora, fauna, people, outside space and relationships between them.

Ethics: Ethics include values or human behaviour that work towards the good of individuals and society, such as morality, justice, transparency and other values that reflect good social conduct. [Adapted from *Glossário dos Indicadores Ethos para Negócios Sustentáveis e Responsáveis* - Glossary of Ethos Indicators for Sustainable, Responsible Businesses]

Forced or compulsory labour: All work or service that is not done voluntarily, under the threat of punishment or retaliation or as a means of repayment of debt. [Adapted from SA8000:2008]

Gender: Concept that refers to the sociological and cultural differences that exist between women and men. It is different from “sex”, which refers to biological and sexual differences. It refers to socially imposed or constructed characteristics that vary according to culture and/or historical period. [Adapted from the Portuguese Platform for Women’s Rights]

Gender equality: Involves the equal visibility, power and participation of men and women in all areas of public and private life.

Health at work: Approach that includes health surveillance and oversight of physical, social and mental aspects that may affect workers’ health, reflecting considerable evolution compared with traditional occupational health methods. [Adapted from *Autoridade para as Condições do Trabalho* - Authority for Working Conditions]

Home worker: A person who is contracted by an organisation, supplier, sub-supplier or subcontractor, but does not work on the organisation’s premises. [Adapted from SA8000:2008]

Human trafficking: The recruitment, transfer, harbouring or receipt of persons, by means of the use of threat, force, other forms of coercion, or deception for the purpose of exploitation. [Adapted from SA8000:2008]

International norms of behaviour: Expectations of socially responsible conduct at organisations arising from customary international law, generally accepted principles in international law and inter-governmental agreements that are universally or almost universally recognised.

Non-compliance: Not meeting a specified requirement. An occurrence that is not in accordance with the documentation of the system or benchmark standard. [Adapted from SA8000:2008]

Observation: Bringing to attention a requirement that could be improved or could cause non-compliance. [Adapted from SA8000:2008]

Partner: Person or group with which economic, social or environmental cooperation is implemented to achieve common interests. Example: franchisees. It is sometimes used in this Code in a broader sense to include all stakeholders involved in the supply chain.

Personnel: All individual men and women directly employed or contracted by an organisation, including directors, executives, managers, supervisors, and workers. [Adapted from SA8000:2008]

Responsibility and accountability: The organisation's responsibility for its decisions and operations and accountability to its governing bodies, legal authorities and, more broadly, its other stakeholders.

Safety at work: Set of suitable methods for preventing accidents at work. Its main field of action is recognising and overseeing the risks linked to material aspects of work. [Adapted from *Autoridade para as Condições do Trabalho* - Authority for Working Conditions]

Senior management representative: Member of the organisation's management appointed to ensure that the requirements of SA8000 are met. [Adapted from SA8000:2008]

Service provider: Person or group that is contracted by the organisation to perform a service.

Social dialogue: Includes all types of negotiation, consultation or simply exchange of information between, or among, representatives of governments, employers and workers, on issues of common interest relating to economic and social policy. [ILO - Social Dialogue Sector]

Social responsibility: The responsibility of an organisation for the impacts of its decisions and operations on society and the environment through transparent and ethical behaviour. It should be consistent with the sustainable development and welfare of society, take into account applicable laws and international norms of behaviour and be integrated throughout the organisation. [Adapted from ISO/WD3 26000]

Stakeholder: Person or group with an interest in any decision or operation by an organisation.

Subcontractor: Person or group that is contracted by a third party to perform a service that has already been contracted by another (the organisation itself).

Sub-supplier: Person or group that is contracted by a third party to supply a product or set of products that has already been contracted by another (the organisation itself).

Supplier: An organisation which provides goods for integral use or for the production of goods or services. [Adapted from SA8000:2008]

Supply chain: Series of operations or partners that contribute to the organisation with products or services.

Sustainable development: Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

Transparency: Openness about decisions and actions that affect society, the economy, and the environment and a desire to ensure clear, precise, timely, honest and complete information.

Value chain: The entire series of operations or partners that supply or receive value in the form of products or services.

Young worker: Any worker over the age specified in the definition of child labour and under the age of 18. [Adapted from SA8000:2008]

Comentário [T7]: Reparei que o termo no docuemnto em português tem uma gralha: Trabalho jovem em vez de Trabalhador jovem

Comentário [TF8]: Acrescentei "labour" porque a definição de "Child" não estar incluída neste documento.