



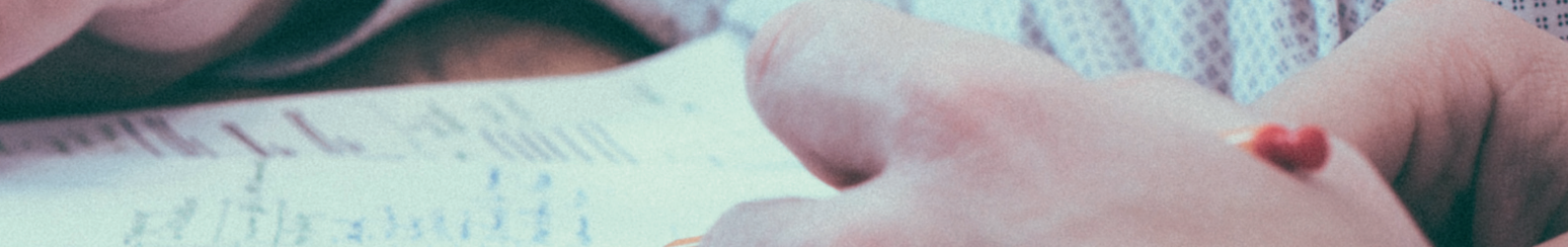
# SUSTAINABLE PROCUREMENT POLICY

**Bigben Connected**



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## **OUR CSR APPROACH**

With over 30 years of experience, Bigben has achieved an optimal level of quality and safety of its products. By displaying genuine concern for respecting consumers, the company has also committed to respecting the environment and even anticipates upcoming regulations.

In 2016, Bigben has joined the United Nations Global Compact and strives to enhance its commitment on Sustainable development.

In line with the Sustainable development approach of Bigben, Bigben Connected is strongly committed to cope with the social and environmental issues related to its activities, including in its supply chain.

## **WHY A SUSTAINABLE PROCUREMENT POLICY**

Sustainable procurement has been central to Bigben's activities since the creation of the company and numerous initiatives have emerged.

Capitalizing on these experiences, this policy aims to formalize and structure the responsible procurement approach of Bigben Connected and Bigben Interactive HK Ltd; to provide a clear vision on the process and tools implemented; and to convey the sustainable procurement orientations for the next few years.

## **SCOPE OF THE POLICY**

This policy covers all the direct procurement activities of Bigben Connected and Bigben Interactive HK Ltd, which operates on behalf of Bigben Connected in Hong Kong and Shenzhen.

## **OUR PROCUREMENT ORGANIZATION**

Our procurement activities are operated by Bigben Connected in France and Bigben Interactive HK Ltd in Hong Kong.

Most of the products offered by Bigben are manufactured at our request.

These products are branded either with our clients' brands, Bigben's brand or a brand for which Bigben is licensed.

The procurement activities related to the products manufactured on behalf of Bigben are operated by Bigben Interactive HK Ltd.

Bigben Interactive HK Ltd. aims to work principally with Preferred partners with which we have a Long-Term agreement.



Bigben also purchases and commercializes products from phone and accessories manufacturing companies and wholesalers.

The procurement activities of those products are operated by Bigben Connected.

Bigben works with established brand suppliers. We validate the opportunity of business with the companies after a thorough review of their CSR performance and only if their performance is in accordance with our own standards.

## **SUSTAINABLE PROCUREMENT APPROACH**

Bigben's procurement seeks to deliver long-term social, economic and environmental benefits.

It integrates, in a spirit of balance between stakeholders, requirements, specifications and criteria related to the protection of the environment, social progress and economic development.

Bigben creates and maintains long term, mutually beneficial relationships with its suppliers and involves them in a continuous improvement approach.

We plan to develop our training program for the buyers on the best practices of sustainable procurement.

## **OUR COMMITMENTS TOWARD OUR SUPPLIERS**

### **Fairness and Impartiality**

All Suppliers are treated with honesty, fairness and respect, and are selected impartially, according to predefined, explicit and transparent criteria.

### **Transparency**

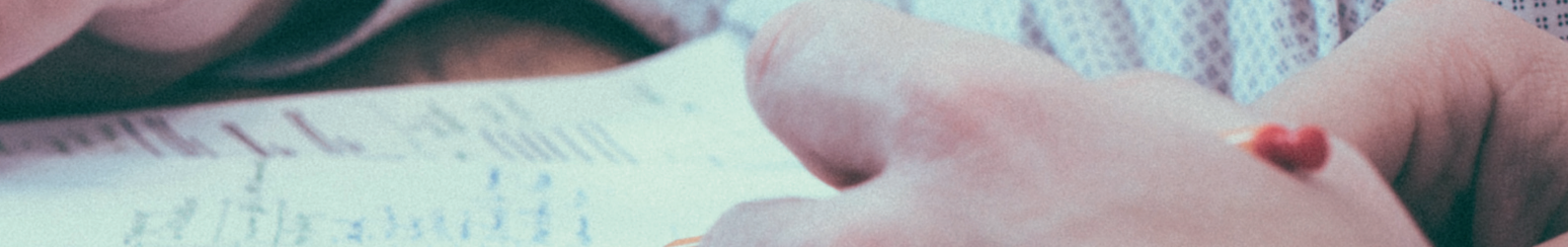
Bigben is transparent in its procurement decisions and activities that impact society, the economy and the environment, and encourages its suppliers to be transparent.

### **Confidentiality and Intellectual Rights**

Bigben respects the confidentiality of technical and commercial information communicated by its suppliers. It also respects suppliers' property and intellectual rights.

### **Anticipation**

Purchase orders are sent to the Suppliers The most ahead as possible to help the factories to manage their workload.



## OUR REQUIREMENTS TOWARD OUR SUPPLIERS

As part of our standard contracts, all our direct suppliers endorse our **Sustainable procurement charter** and undertake to comply with the eight ILO's (International Labor Organization) fundamental Conventions listed below:

1. Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)
2. Right to Organize and Collective Bargaining Convention, 1949 (No. 98)
3. Forced Labor Convention, 1930 (No. 29)
4. Abolition of Forced Labor Convention, 1957 (No. 105)
5. Minimum Age Convention, 1973 (No. 138)
6. Worst Forms of Child Labor Convention, 1999 (No. 182)
7. Equal Remuneration Convention, 1951 (No. 100)
8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

Our Suppliers also commit on the 10 principles of the United Nations Global Compact:

### Human rights

1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. Make sure that they are not complicit in human rights abuses.

### Labor rights

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. The elimination of all forms of forced and compulsory labor;
5. The effective abolition of child labor; and
6. The elimination of discrimination in respect of employment and occupation.

### Environment

7. Businesses should support a precautionary approach to environmental challenges;
8. Undertake initiatives to promote greater environmental responsibility; and
9. Encourage the development and diffusion of environmentally friendly technologies.

### Anti-corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.

Those requirements are communicated to our Suppliers through the contractual agreements and the Sustainable procurement charter.

Our Sustainable procurement charter is formally presented to all our suppliers for signature.



## **PRODUCTS SELECTION AND DESIGN**

The potential safety and environmental impacts of the products offered by Bigben are taken into account from the design or selection stages.

Bigben aims to favor the products made from recycled and/or recyclable, bearing an eco-label or allowing the users to improve their environmental footprint.

In any case, all the products offered by Bigben are designed or selected to guarantee the health and safety of the users.

Our objective is to increase our ranges of products “made in France”, ecolabeled or ecofriendly.

## **SUPPLIERS ENVIRONMENTAL AND SOCIAL AUDITS**

Our preferred partners are required to provide an onsite audit report (SA8000 or BSCI) every two years for all their manufacturing sites working for Bigben, as a prerequisite to any business with Bigben.

The audit reports must indicate that no critical or major non-conformity have been found. The suppliers are asked to implement the relevant corrective actions to address the minor non-conformities and to report on their progress.

In some limited occasions, Bigben is led to work with non-preferred suppliers. In this situation, an on-site audit is conducted by our quality manager, or a collaborator specifically trained.

We aim to develop our audit and CSR performance monitoring approach with the suppliers managed from France.

## **PRODUCTS VERIFICATION**

A sample of every product purchased outside the European Union is tested by an external laboratory according to the relevant European regulations, including but not limited to REACH and RoHS regulations (for a detailed information please refer to General compliance and testing requirement)

Bigben seeks to collect the relevant certificates for every product purchased in the European Union.

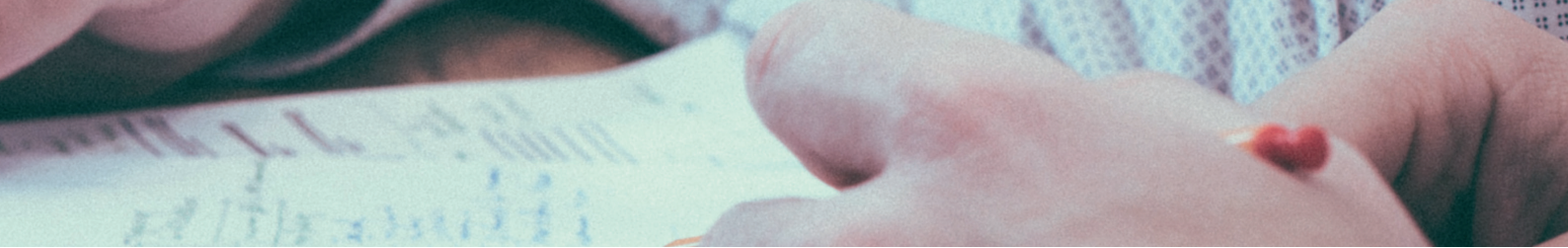
## **RESPONSIBILITIES**

Bigben Interactive HK Ltd

The compliance with this policy is under the responsibility of Xavier Bouteyre, Purchasing Manager and Johnny Wong, Quality Manager.

Bigben Connected

The compliance with this policy is under the responsibility of Delphine Berdah, Head of products.



## **REVIEW AND VALIDATION PROCESS**

The Sustainable procurement policy has been revised and approved by the management committee.

The management committee will review its content and application every year and will bring any change needed. Those changes will be effectively communicated to all persons involved in procurement activities.

## **COMMUNICATION**

The sustainable procurement policy is communicated to all persons and departments involved in procurement activities.

It is made available on request for all business partners and stakeholders.

## **VERSION**

Sustainable Procurement Policy V1, published in March 2016, for immediate application.