



EVERYONE COMMITTED, EVERYONE RESPONSIBLE
OUR ANTI-CORRUPTION SYSTEM



Corruption

Is defined as an act whereby a person holding a specific public or private sector function, solicits or offers or accepts or gives a gift, offer or promise to carry out, obstruct or abstain from carrying out an act pertaining directly or indirectly to his function.



Influence peddling



Is defined as "the direct or indirect request or acceptance without right and at any time of offers, promises, donations, gifts or advantages for oneself or others, when done by a person holding public authority or discharging a public service mission, or by a person holding a public electoral mandate: to carry out or abstain from carrying out an act relating to his office, duty, or mandate, or facilitated by his office, duty or

mandate; or to abuse his real or alleged influence with a view to obtaining from any public body or administration any distinction, employment, contract or any other favourable decision."

To fight against corruption and influence peddling, the Bolloré Group and all its subsidiaries adhere to a same Code of Conduct aimed at fostering integrity and transparency in the conduct of our business and our relations with others.

Our resources

OUR CODE OF CONDUCT



THE FIGHT AGAINST CORRUPTION

We act with integrity in all circumstances.

We neither offer nor accept anything of value, with the aim of gaining an undue advantage.



FREE COMPETITION

We do not participate in anti-competitive practices aimed at price fixing or market sharing.



INTERNATIONAL SANCTIONS

We do not do business with individuals, entities or governments subject to sanctions and do not transport goods breaching embargoes.



SAFETY AND SECURITY

We protect the health and safety of our people in the context of our business activities.



HUMAN RIGHTS

We act responsibly and ensure that human rights are respected.



DIVERSITY

We foster equality between all people, regardless of their culture, age, nationality, religion, political opinions or sexual orientation.



THE ENVIRONMENT

We are committed to energy transition and managing our environmental footprint while conducting our business activities.

All employees, regardless of their status or work place, and all business partners acting on behalf of the Group, must comply with our Code of Conduct. Any breach of these rules shall be disciplined in accordance with applicable laws.

THESE RULES APPLY TO ALL!

THE PILLARS OF OUR ANTI-CORRUPTION SYSTEM

A dedicated structure ensures the proper understanding and respect of the Sapin II law, the recommendations of the French anti-corruption agency, and all applicable laws and international standards.

The system is based on:

01

RISK MAPPING AND REPORTING

Since 2013, we have rolled out annual campaigns to assess the exposure of our subsidiaries to and consequently map the risk of corruption and influence peddling. We also implemented a reporting to collect information on our subsidiaries, in order to corroborate the risks identified in our mapping.

02

AWARENESS AND TRAINING

We ensure that our employees have a sound understanding of the Code of Conduct. Regarding anti-corruption, we specifically train employees identified as exposed. Sessions are organised in classrooms and via e-learning online platform, to promote the Code of Conduct and the whistle-blowing system. In addition, employees identified as risk-exposed – due to their participation in at-risk processes – attend specific training.

03

DUE DILIGENCE

As part of our vetting process, we check that our suppliers, subcontractors and other business partners comply with our Code of Conduct.

04

WHISTLE-BLOWING SYSTEM

We are all responsible for declaring any situation that constitutes or could constitute a breach of the Code of Conduct. They may do so via their line management or confidentially by sending an e-mail to:

alerte.ethique@bollore.net

If you have any questions or uncertainties regarding correct behaviour to be observed, please feel free to contact the Ethics and Compliance Department or its local representative:

B'Connected/Ethics&Compliance
compliance@bollore.com