



Compliance program

Responsible and committed



BOLLORE

French anticorruption agency (AFA) guidelines

French Law Sapin 2 (dated December 9, 2016) requires companies to implement the following program:



Top management commitment



Code of Conduct



Whistleblowing system



Risk mapping



Third party due diligence



Anticorruption accounting control



Awareness and training



Internal monitoring and system evaluation



Responsible and committed

We are all holding in trust for the commitment of men and women who century over century forged the ethics and values of the Bolloré Group.

The Group prohibits all forms of corruption and influence peddling, ensures compliance with competition laws and international sanctions programs, prevents environmental damages, health and safety risks, violations of human rights and forbids discrimination and harassment.

This Code of Conduct applies to all acting on behalf of Bolloré and I invite you to report any behavior that would be contrary to this Code to your line manager or use the dedicated whistleblowing process.

The Group ensures a confidential processing of personal data and the protection of the informer acting in good faith against any form of retaliation.

We must be exemplary and act in all circumstances with integrity to protect the reputation of our Group and ensure a sustainable success.

Cyrille Bolloré
Chairman and Chief Executive Officer

Our compliance program



Bolloré Group intends to comply with all applicable laws regarding fight against corruption, international sanction, anticompetitive practices and the expectations of its stakeholders. The Group is monitoring compliance with this commitment and created a Program inspired by international standards such as AFA, US FCPA and OFAC standards. This document specifies how this program is implemented.

ecovadis

Sedex[®]

TRACE

TRANSPARENCY
INTERNATIONAL

ISO

MACN
Maritime Anti-Corruption Network

GRI STANDARDS

goodcorporation



Top management commitment

Bolloré Top management is committed to comply with laws and regulations governing the fight against corruption and strictly prohibits bribery or any other improper payments in business dealings.

On the right, Philippe Labonne and Thierry Ehrenbogen for the International Anticorruption Day in 2018.



Code of Conduct

The Group is signatory of the United Nations Global Compact since 2003, a voluntary initiative supporting companies to align their strategies and operations with ten principles on human rights, labour, environment and anti-corruption; These principles are specified in our Code of Ethics and our Code of Conduct outlines the behaviors that must be followed to comply with them. Integrity in the conduct of our business is a key element of our Code of Conduct, which all subsidiaries, directors, employees and business partners acting on behalf of the Group must comply with.

This code promotes the fight against corruption in all its forms and against influence peddling, but also fair competition, compliance with economic sanctions, diversity and environmental protection.





Whistleblowing system

The Group whistleblowing procedure may be used by any employees of the Bolloré Group or its business partners, and any individual whose interests may be affected by the Group's activities.

Notably, Employees having knowledge of misconducts that may constitute violation of the Group's Code of Conduct can report to their line Management or alternatively use the dedicated process.



Risk mapping

Corruption risk mapping were achieved in order to implement action plan to mitigate risk identified.



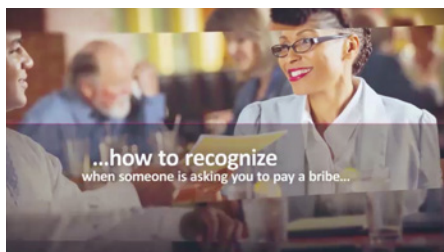
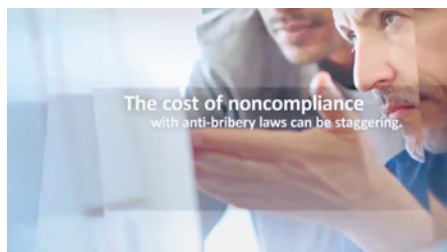
Third party due diligence

As part of our vetting process we check that our suppliers, subcontractors and other business partners comply with our Code of Conduct and we evaluate them through a risk-based approach.



Anticorruption accounting control

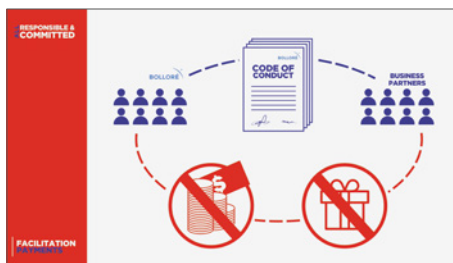
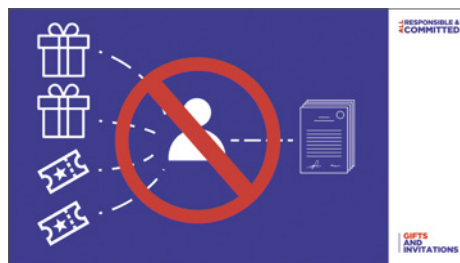
These controls were identified during the risk mapping process. These specific controls are exercised through different level of the organization.





Awareness and training

We ensure that our employees have a sound understanding of the Code of Conduct and 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 whistleblowing system.



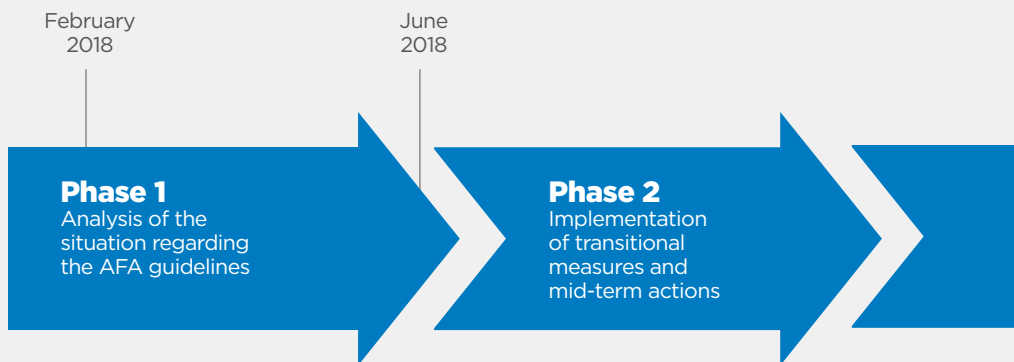
Internal monitoring and system evaluation

A compliance dedicated reporting collecting information on our subsidiaries, their business, shareholders, directors, employees and business partners.

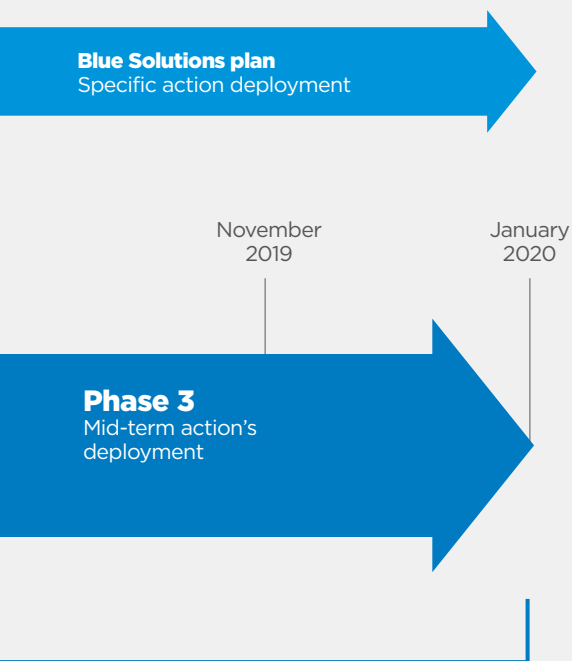


Our anticorruption system in 2020

In compliance with Sapin 2 Law,
we intent to achieve the adaptation
of our anticorruption system by 2020.

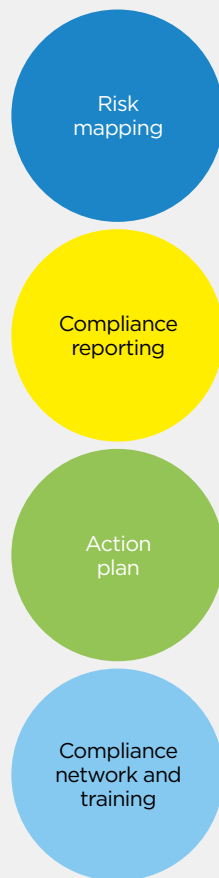


From project...



... to operations

Four key topics of the project



Key project owners



Key figures on compliance

Whistleblowing system

France e-mailing campaign:

Campaign starting date on
Sept. 30, 2019

+200 branches

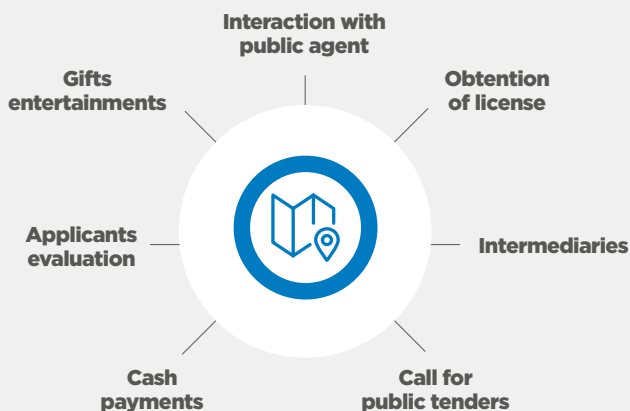
+7,500 employees

Code of Conduct

	Collective bargaining
Completion per company	Number
Africa	100
Americas	3
Asia-Pacific	3
Europe	39
Middle East, South Africa	5
Total	150

Risk mapping

BTL/Bretagne divisions/System and Telecoms



Awareness



14,834

attendees

Training



23,454

completion

Compliance reporting



313

companies

800+

contributors

Third party due diligence



Data collection on

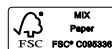
5,500+

third parties

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