

# OUR CODE OF CONDUCT



The Code of Conduct can be supplemented by application policies and procedures and other information or training materials (videos, etc.) These additional resources can be accessed by scanning the QR codes appearing throughout this document.

**All available versions of the Code of Conduct can be accessed from the Group's Internet site by scanning the QR code below**



# CONTENTS

## Introduction

4

Message from Cyrille Bolloré,  
CEO of the Bolloré Group

5

Commitments, values and scope of the code

## Part 1

### Group policies

10

Corruption, anti-competitive practices  
and international sanctions

14

Human rights

18

Health and safety of individuals

21

Diversity

23

Environment

24

Protection of personal data and security  
of information systems

27

Company assets

## Part 2

### Compliance with the Code of Conduct

33

Whistleblowing system

34

Awareness-raising and training



## Acting with integrity

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# Foreword

For over 200 years, the Bolloré Group has adapted and reinvented. Our longevity is the result of the commitment of the men and women who have grown our business while respecting our values. Integrity is the cornerstone of our relationships with our customers and partners, the foundation on which confidence and success are built.

The Group's directors and managers have a particular responsibility to embody this integrity. As employees, you are all ambassadors for the Bolloré Group. This is why I ask all employees to always act in compliance with the applicable laws and our Code of Conduct. No circumstance can excuse any actions running counter to these principles.

I would also ask you to report any breaches to which you are witness. At stake here is our collective responsibility and the very survival of our Group.

Statements of intent do not suffice. Always act responsibly and transparently. I am counting on you to ensure that the Group remains true to its principles and continues to move forward as one with agility, courage and determination.

Thank you all for your commitment.

**Cyrille Bolloré**

Chairman and Chief Executive Officer of the Bolloré Group

A stylized, handwritten signature in blue ink, likely belonging to Cyril Bolloré.



# Our Code of Conduct confirms the Group's commitment

The Bolloré Group undertakes to fulfil the expectations of all its stakeholders in terms of business ethics and align with international standards relating to CSR issues, such as the guiding principles of the UN, the OECD and the United Nations Global Compact, the Bolloré Group having been a signatory of the latter since 2003. In particular, the Group supports the ten principles of the UN Global Compact on human rights, labour standards, the environment and anti-corruption, and is committed to integrating them into its strategy, culture and day-to-day operations. This commitment is reflected in the Bolloré Group's policy on social and environmental responsibility, as set out in its Ethics and CSR Charter and its Sustainability Report.

## THREE FUNDAMENTAL COMMITMENTS



### Governance

**Conduct our business with integrity, in accordance with the values and principles shared by all our employees and stakeholders.**



### Social

**Unify, protect and develop/train our employees, the company's greatest strength, in an attractive and inclusive environment and in our value chain.**



### Environment

**Adapt to climate change by innovating in our products and services and shrinking our carbon footprint.**



The Code of Conduct expresses the determination of the Group and its representatives to act with integrity in all circumstances, in compliance with applicable laws (in particular the French Duty of Vigilance Act, the French Sapin 2 Act, the European Green Taxonomy Regulation and the European Corporate Sustainability Reporting Directive).

**WE SUPPORT THE  
GLOBAL COMPACT**



# Values and principles embodied on a daily basis

**The Bolloré Group is built on strong values supporting shared objectives and on a long-term vision.**



## **Humility**

Respectful of others, we are grateful for everyone's contribution.



## **Excellence**

Demanding the best for our customers, we are constantly improving.



## **Courage**

Resilient, we are moving forward boldly to meet the challenges ahead.



## **Solidarity**

Responsible and committed, we contribute to the development of local communities.



## **Agility and Innovation**

Attentive to change, we know how to adapt and dare to create value.

**This vision is based on immutable principles embodied by all our managers and employees around the world.**

- **the fight** against corruption;
- **the fight** against anti-competitive practices;
- **compliance** with international sanctions;
- **respect** of human rights;
- **the protection** of the health and safety of people;
- **the preservation** of the environment;
- **the protection** of personal data;
- **the fight** against discrimination;
- **the protection** of the company's assets and financial transparency.

Our Code of Conduct sets out the Bolloré Group's policy in this area and also illustrates the conduct to be adopted when faced with risky situations

# Our Code of Conduct applies to everyone



Our Code of Conduct applies to all persons acting on behalf of the Bolloré Group. It is incorporated into the internal regulations of all the Group's subsidiaries and distributed to all their employees. It is also available on the Group's website and must be passed on to all its partners as an integral part of its expectations.

The Bolloré Group does not tolerate any breaches of its Code of Conduct and calls on its stakeholders to report any actions that run counter to it by means of the whistleblowing system.



→ The Bolloré Group operates in three main sectors: Oil Logistics, Communication and Industry. The Vivendi Group has its own ethics system for managing its communication activities, applicable to its companies and adapted to their business lines.

• Find out more at: [www.vivendi.com](http://www.vivendi.com)

Part 1

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# Group policies





# Corruption, anti-competitive practices and international sanctions



## The fight against corruption

### ➔ The key features of our policy

The Bolloré Group condemns all forms of corruption and influence peddling. Persons acting on behalf of the Group must refrain from offering or accepting undue advantages with a view to illegally influencing the decision-making process.

#### What? Advantages

There is no exhaustive list of undue advantages, but they include paying small sums of money as part of an administrative process, offering or accepting luxurious or extravagant gifts, accepting invitations to events with no professional purpose, or hiring an unqualified person at a high salary.

#### Who? Any person

Bribery and influence peddling are punishable for both instigator (active offence) and recipient (passive offence). It makes no difference whether these advantages are granted directly or indirectly (through an intermediary). Public corruption occurs when the beneficiary is a representative of public authority, entrusted with a public service mission or invested with an elective mandate; private corruption occurs when the beneficiary exercises functions within a private company, and management functions in particular.

#### Why? Influencing the decision-making process

The purpose of these actions is to illegally influence the decision-making process, notably with a view to obtaining or renewing a contract or certification or to avoid paying a fine.

## WHAT ACTION SHOULD BE TAKEN?

### → N°#1: A business partner invites me to a sporting event

A supplier with whom I have an excellent business relationship invites me to a major sporting event sponsored by his company. I am reluctant to say yes, knowing that my contact will not be there, that my spouse is also invited and that I am currently working on renewing the contract with this company.

#### Conduct to be adopted

On specific occasions, it is customary to offer or receive gifts or invitations. A procedure exists setting out the rules to be followed in this respect. An invitation must have a strictly professional purpose and the event must be held in an environment compatible with this purpose. Furthermore, members of the beneficiary's family must not be invited and their expenses must not be covered under any circumstances. They should also never be given during calls for tender or contract renewal processes. Consequently, this action does not comply with the Group's procedure and must be courteously refused.

### → N°#2: A public official offers to speed up a procedure in exchange for payment

A supplier asks me to reimburse an expense incurred in cash at the request of a public official and for which no receipt has been issued.

He explains that the purpose of the expenditure was to carry out an administrative formality for the public official in question that is necessary for the continuation of an ongoing operation.

#### Conduct to be adopted

Even if he did not initiate the solicitation, the intermediary gave in to corruption by accepting a "facilitating" payment. This type of payment consists of the direct or indirect remuneration of a public official with a view to obtaining, facilitating or expediting the completion of administrative formalities.

Barring exceptional circumstances in which this type of payment is demanded under duress, any person acting on behalf of the Group must object to such payments. Contact your Compliance Officer in the timeliest possible manner to report the situation and suspend the payment pending the Compliance Officer's response on the action to be taken.

### → N°#3: An employee suggests hiring a candidate to facilitate the award of a public contract

Although a candidate had no qualifications for the post to be filled, the head of department having initiated the recruitment insisted on choosing this person, who was close to a decision-maker in the award of a public contract.

#### Conduct to be adopted

The Group is committed to giving everyone **equal recruitment opportunities** and will take appropriate action against those involved in discriminatory or corrupt practices, regardless of their performance.

To prevent recruitment risks, **follow the applicable procedures and be alert to warning signs**, such as an unusual insistence on a candidate without objective justification or a lack of the required skills or experience.

### → N°#4: I am offered privileged information in return for compensation

As part of an acquisition project, I have been approached by a person acting on behalf of an employee of the target company who may be in possession of information on fraudulent practices. This employee is ready to provide us with evidence if we protect their anonymity and offer them compensation. I am not sure what to do, given that this information could have an impact on the valuation of the target company.

#### Conduct to be adopted

The existence of illicit activities in which the target company, its subsidiaries or any of its shareholders, directors, officers or employees are involved may have an impact on the setting of the transaction price and, under certain conditions, engage our liability.

But we must never give in to corruption, regardless of the motives. The checks carried out as part of the in-depth analysis of the target company are designed to identify these irregularities, and our whistleblowing system is accessible to the Group's stakeholders, in particular its co-contractors and their employees.

→ For more information on the Bolloré Group's anti-corruption policy, in particular concerning gifts and invitations, facilitation payments, representation of interests, patronage and sponsorship:

- Refer to the dedicated space on your intranet;
- Contact [compliance@bollore.com](mailto:compliance@bollore.com).



# The fight against anti-competitive practices

## 🔑 The key features of our policy

A healthy competitive environment, conducive notably to innovation, enables us to provide our customers with the best possible products and services. The Bolloré Group does not take part in any practice aimed at or having the effect of preventing, restricting or distorting free competition. These practices notably include agreements aimed at reaching direct or indirect agreements, either written or oral, between competitors on prices, or those aimed at sharing markets or invitations to tender, both geographically and in terms of products or customers.

Each company in the market must determine its behaviour independently, without knowing with any certainty how its competitors will behave. As such, exchanging sensitive information with competitors (for example, on pricing policies, details on capacities, costs and production methods, lists of customers or suppliers) is likely to constitute an unlawful practice.

## WHAT ACTION SHOULD BE TAKEN?



### → N°#1: Competitors want to discuss the distribution of an important contract

My company is a member of a professional association that groups players in the sector. During a meeting I attended, a discussion began between competitors concerning a major ongoing public invitation to tender, suggesting that an agreement could be reached between several companies to divide up the work packages.

#### Conduct to be adopted

Professional organisations can be useful for discussion on common issues: regulations, technical standards, product safety, defence of the interests of the profession, etc. However, if subjects such as price fixing, market share distribution or current invitations to tender are discussed, it is important to leave the room immediately and make sure your departure is recorded. You should then report the incident to your line manager or by using the alert system.

### → N°#2: A customer suggests we come to an agreement on fixing the prices of our products

A customer with a large market share offers a significant increase in orders and in the resources devoted to promoting our products in return for a commitment from us not to sell our products to its competitors at a lower price.

#### Conduct to be adopted

An agreement between two or more companies operating at different levels of the production or distribution chain, and fixing the conditions for the purchase, sale or resale of goods or services, is likely to be classified as a **vertical agreement**.

Before any exchange of this type, **the Group Legal Division should be contacted** so that a specific analysis can be carried out.



# Compliance with international sanctions

## 🔑 The key features of our policy

By virtue of the constant evolution of regulations and laws on trade and international sanctions, the Bolloré Group complies with the Export Control programme. These international sanctions have been imposed by the United Nations Security Council, the European Union and the United States. The export control programme has been decreed by both the European Union and the United States. Whether it involves restrictive measures against a state, an individual or an organisation, or the prohibition of certain categories of products (technology, services, etc.), the application of this programme organises the control in accordance with the law.

Any person acting on behalf of the Group must refrain from participating in operations that could contravene an embargo, sector sanctions or the freezing of assets.

## WHAT ACTION SHOULD BE TAKEN?

### → N°#1: My customer in Somalia orders product references containing components of US origin

My customer is seeking for the first time to import another product from my range containing US technology. The customer is qualified and recognised in the marketplace. Sector sanctions currently apply to this destination. Can I approve the transaction for this destination?

### → N°#3: My customer in Kazakhstan orders a product from me that is listed among the sanctioned products destined for Russia

The customer wants to buy a product from my range that is listed among the sanctioned products destined for Russia. The customer is qualified. Kazakhstan is not currently subject to sanctions but requires special attention. What should I do given its proximity to Russia and the extraterritoriality of US laws?

### → N°#2: I want to travel to China to present a product to a customer

The product contains US technology. This destination, subject to sectoral sanctions, is currently subject to increased restrictions under US law, and requires particular attention owing to the extraterritoriality of US laws. To facilitate the transaction, I would like to take the product for sale as hand luggage for demonstration purposes. Am I allowed to do this? What needs to be checked? What are the prerequisites?

### → N°#4: My customer in Sudan places an order with me for an appliance classified as "dual use"

My customer orders a dual-use product from my range. The customer is qualified and recognised in the market. Sudan is currently subject to sector sanctions, including on dual-use goods. What are the prerequisites for approving an order for this destination?

#### Conduct to be adopted

As with some countries, some categories of goods are subject to restrictions imposed by international organisations, and export controls are highly regulated, requiring **increased due diligence**. Information on the end use and the end user, as well as prior authorisations, are required to approve the transaction.

If in doubt, **consult the special intranet section on international sanctions**, which contains information on how to comply with the export control procedure and follow the steps for verifying exportability. You can also **contact the Compliance Officer** for your scope and, if necessary, your Legal Department.

→ Find out more about the Group's Guidelines and Policy on international sanctions and export controls on the dedicated **area of your intranet**.



# Human rights



## Protection of freedom of expression and association

### ➔ The key features of our policy

The Bolloré Group promotes the right to freedom of expression, association and collective representation, and is committed to ensuring open social dialogue under all circumstances. We guarantee regular collective bargaining procedures with employee representatives qualified to deal with issues relating to working conditions. We encourage meetings with employee representatives, held more regularly than required by the law, to promote the continuity of employer-employee dialogue within the company. In regions where independent trade unions are limited or discouraged, we allow our employees to meet independently to discuss their professional concerns. For example, during their regular working hours, employees can meet with the management to discuss any legitimate issues relating to their working conditions. Any person acting on behalf of the Group must refrain from any form of pressure, exaction or behaviour aimed at altering or hindering the expression of employees.

## WHAT ACTION SHOULD BE TAKEN?

### → N°#1: My employees wish to express demands but there is no framework for social dialogue in the country

I manage an entity in a country where the collective organisation of workers is not provided for by law. Some of my employees have made demands that they would like to talk about, and are considering forming a trade union for this purpose.

#### Conduct to be adopted

The Bolloré Group is committed to **facilitating employee expression** and to guaranteeing **non-discrimination** against workers involved in representative structures. In accordance with local laws, employees must be seen and their demands considered.

→ **Contact the Group's human resources division** to put in place **tools and procedures** used to gather requests from your employees, and thus to ensure open social dialogue in compliance with local legislation.

### → N°#2: I am wondering about whether I can express an opinion on the organisation of a task entrusted to my team

I would like to tell my manager what I think about the organisation of a task assigned to my team and I am wondering about my freedom of expression on this subject.

#### Conduct to be adopted

The Bolloré Group promotes the right of its employees to freedom of expression, especially if it allows them to share their experiences and express their opinions. Freedom of expression is a **fundamental right** (enshrined in *Article 10* of the **European Convention for the Protection of Human Rights and Fundamental Freedoms**) and is protected in many countries. Employees naturally enjoy this fundamental right in the workplace within the limits set by the law of each country to ensure that no abuse is made of this right.

## The fight against forced labour and human trafficking

### ⇒ The key features of our policy

The Bolloré Group is firmly committed to fighting all forms of modern slavery and human trafficking. Any person acting on behalf of the Group must refrain from participating in or contributing, directly or indirectly, to situations of forced labour. Forced labour refers to any work performed against one's will and under threat of any kind, including the use of violence or intimidation, the manipulation of debts, the withholding of wages or identity papers, and the threat of reporting individuals to the migration authorities. Human trafficking is the exploitation of individuals through forced labour, often involving the transportation of these individuals within a country or across borders.

## WHAT ACTION SHOULD BE TAKEN?

### → On a subcontractor's premises, employees appear to be forced to work in unsafe conditions

When visiting the site of a Group company, I realise that workers hired by a subcontractor are working without the appropriate equipment. Some of them accuse their company of blocking the payment of their salaries to force them to keep working in dangerous conditions, even though they want to quit.

#### Conduct to be adopted

If the facts are found to be true, you should **urgently inform** your line manager or CSR contact, or **report it** through the professional alert system. Checks will be carried out with the subcontracting company and it will be possible to take corrective actions quickly.

# The fight against child labour

## 🔑 The key features of our policy

In compliance with the provisions of the International Labour Organization (ILO), the Bolloré Group refrains from using child labour, both directly and indirectly. In addition to the commitment to comply with local legislation regarding the minimum age of employment, the Group prohibits the hiring of children under the age of 15 for any work, and the hiring of young people under the age of 18 for any type of work referred to as "dangerous".

## WHAT ACTION SHOULD BE TAKEN?

### → One of my subcontractors uses employees who seem very young

In the country where the company in which I work is based, the employment of children under the age of 15 is not prohibited. During a visit a site operated by one of our subcontractors, I noticed that some of the employees appeared very young.

#### Conduct to be adopted

If you witness child labour, or if you suspect child labour on the premises of one of our suppliers or subcontractors, **report the situation** to your line manager or CSR contact, or **use the whistleblowing system**. In regions where legislation or practices give rise to a suspicion of risk, the recruitment and use of subcontracted workers must be subject to **heightened vigilance**.

**Systematically check the identity documents of the workers you are going to employ** and require the same from your business partners, reminding them that failure to comply with this commitment would mean the partnership would be terminated.



## Rights of local communities and local residents

### 🔗 The key features of our policy

In compliance with local regulations and international standards, as set out in the Ethics and CSR Charter and the Human Rights Charter, the Group is committed to initiating dialogue with its stakeholders and respecting and promoting the rights of local communities and residents that may be impacted by the performance of its activities.

## WHAT ACTION SHOULD BE TAKEN?



### → N°#1: The inhabitants of the neighbouring municipality accuse my company of pollution

The entity where I work is located in a region close to natural and agricultural areas on which local communities depend. Residents of the neighbouring municipality are complaining about plastic waste found on roadsides and in bodies of water and are accusing the company of being the cause.

#### Conduct to be adopted

You must first determine whether the pollution reported is the result of misconduct on the part of an employee or partner acting on behalf of the company, or of a failure to apply internal environmental management processes.

If you witness or suspect disrespectful behaviour on the part of an employee or partner/subcontractor working on site (for example, the dumping of waste), **report the situation** to your line manager or environmental officer, as appropriate, or **use the whistleblowing system**.

In regions where solutions for the recovery, management and sorting of waste are poor and/or absent, **appropriate solutions must be put in place** to prevent, correct or compensate for the risks of pollution.

### → N°#2: My company is accused of being complicit in violence against local populations

In the region where my company is located, a company is accused of violent behaviour towards local residents. Since this company is one of our subcontractors, the local authorities accuse us of being complicit in this violence.

#### Conduct to be adopted

If you witness or suspect violent practices on the part of a supplier or subcontractor, **immediately report the situation** to your line manager or CSR contact, or **use the whistleblowing system**. **Dialogue with local communities should be ensured and pursued**, and the facts reported should be investigated. If they are found to be true, corrective measures will have to be taken by the subcontracting company, failing which the business relationship will be terminated.



# Health and safety of individuals



## Protection of workers

### → The key features of our policy

The Bolloré Group is committed to ensuring a safe and healthy working environment, by providing a framework used to identify and minimise the risks associated with its activities and by deploying an effective social protection policy.

Any person acting on behalf of the Group must refrain from any behaviour likely to endanger the life or health of employees, suppliers, subcontractors, customers, users and local resident populations.

## WHAT ACTION SHOULD BE TAKEN?

### → N°#1: I witness behaviour that I believe puts a colleague in danger

When working in a very noisy manufacturing area, my colleague does not systematically wear his/her earplugs, even though we are formally required to do so. I have politely pointed this out to him/her several times, but nothing has changed. I am afraid he/she will take it badly if I discuss this with our manager.

### Conduct to be adopted

Employee safety is a priority for the Bolloré Group and everyone is responsible for contributing to it. It is important to **alert your line manager** of this situation, after having **informed your colleague** that he or she has obliged you to do so. In general, make sure that you **know, understand and apply the procedures and rules related to employee health and safety**. If in doubt, do not hesitate to contact your QHSE or Human Resources managers.

## WHAT ACTION SHOULD BE TAKEN?

### → N°#2: I have to travel to a country considered sensitive

For professional reasons, I have to travel to a country that is experiencing certain political and social tensions. Although the situation in the field seems calm, I am wondering about the best way to prepare for this trip, in order to be able to react in the best possible way should security problems arise locally.

#### Conduct to be adopted

Prior to your trip, make sure that your **personal information** (copy of your passport, address of residence) is **up-to-date** with your division and, if necessary, with the diplomatic authorities on site. Strictly comply with **local regulations** regarding entry to the region (entry visa, possible customs declarations, etc.). Once you have arrived, several measures should be taken to make sure that your journey is as safe as possible. You will need to **fully familiarise yourself with the geography** of the area and locate your meeting point, your hotel, routes and possible means of transport, as well as areas requiring greater vigilance. **Discretion** is also recommended when travelling. You are advised to carry only a small amount of local currency and, if necessary, use only the cash dispensers located inside banks. You should be careful **not to draw attention** to yourself through flashy clothes or objects and avoid using political or partisan language in discussions or on social networks. **Systematically avoid demonstrations or other public order disturbances** and remain discreet about your status as a Bolloré Group employee. You should always carry a charged mobile phone and a handwritten list of your important contacts.



→ Before you travel, **register with Fil d'Ariane** (a service provided by the Ministry of Europe and Foreign Affairs).



→ For any questions relating to safety, please contact the Group Management Division: [suretegroupe@bollore.com](mailto:suretegroupe@bollore.com)

## The fight against psychological and sexual harassment

### ⇒ The key features of our policy

The Bolloré Group is committed to combating all forms of psychological and sexual harassment. Psychological harassment is defined as repeated acts having the purpose or effect of degrading working conditions that are likely to undermine the rights and dignity of other people, to affect their physical and mental health or to compromise their professional development. Sexual harassment is the repeated use of words or behaviour with a sexual or sexist connotation that violate a person's dignity due to their degrading or humiliating nature, or that create an intimidating, hostile or offensive situation for the person in question.

## WHAT ACTION SHOULD BE TAKEN?

### → N°#1: My line manager insists on inviting me to dinner but I do not want this

My manager has repeatedly offered to invite me to dinner alone without any professional justification. I always decline, but he/she insists. I am afraid that if I ask him/her to stop, it will backfire on me and be prejudicial to my work.

#### Conduct to be adopted

The behaviour of the line manager is not appropriate. You must **inform your Human Resources manager** or use the **whistleblowing system** provided. Bolloré ensures the **confidential handling** of alerts and the protection of whistleblowers acting in good faith against any form of retaliation.

### → N°#3: One of my colleagues, with whom I am working on a project, has repeatedly been the subject of demeaning personal remarks

The project manager repeatedly reminds him/her how inefficient, poor and incompetent he/she was during a previous project. These remarks, which do not appear to be based on facts, are often made in front of the entire team. The result is a hostile environment for the project, and my colleague is becoming more and more withdrawn and silent. Should I take action? Talk to someone about it?

#### Conduct to be adopted

The behaviour of the project manager is not appropriate. You should **suggest to the person who has been the victim of these actions that he/she should inform his or her line manager or Human Resources manager**. If the person is uncomfortable doing this and the situation continues, you must **inform your line manager or your local Human Resources manager**.



### → N°#2: I witness inappropriate remarks made to a colleague at work

A member of staff often makes sexual or very inappropriate remarks to another colleague in public in a joking tone. This member of staff does not seem very comfortable with the situation, but without saying so. I do not see the situation changing. Should I take action? Talk to someone about it?

#### Conduct to be adopted

If you witness an inappropriate remark in the context of professional relations, you should first suggest to the victim that the perpetrator of the inappropriate remarks be told that they are **not acceptable**. If the victim is uncomfortable with this idea, then suggest that he or she **discuss it with his or her line manager or Human Resources manager**. If he or she still does not dare to act and the situation persists, you must **inform your line manager or your local Human Resources manager**.

### → N°#4: I witness sexist behaviour

I have **seen** a female employee **criticised** because she did not dress in a sufficiently "feminine" manner (or a male employee criticised for not dressing in a sufficiently "masculine" manner). I have witnessed a discussion in which it was implied to an employee that her availability or professional commitment would be affected by her maternity and family responsibilities:

#### Conduct to be adopted

If you witness an inappropriate remark in the context of professional relations, you should first suggest to the victim that the perpetrator of the inappropriate remarks be told that they are **not acceptable**. If the victim is uncomfortable with this idea, then suggest that he or she **discuss it with his or her line manager or Human Resources manager**. If he or she still does not dare to act and the situation persists, you must **inform your line manager or your local Human Resources manager**.





# Diversity



## The fight against discrimination

### ➔ The key features of our policy

The Bolloré Group strives to give everyone equal opportunities with regard to recruitment, employment, personal and professional development and promotion. This commitment is based on an **inclusive culture** that enables everyone, whatever their particularities, to **reveal their full potential**. Any person acting on behalf of the Group must refrain from any discriminatory statements and practices based on origin, gender, family status, pregnancy, physical appearance, surname, state of health, disability, sexual orientation, age, political opinions, trade union activities, membership of a particular ethnic group or religion. The Group is particularly committed to **promoting diversity in the workplace, professional equality between men and women**, and to **fostering the professional integration of young people and the employability of seniors**. The Group is committed to ensuring that employees taking maternity or paternity leave are not discriminated against in terms of career development or pay.

## WHAT ACTION SHOULD BE TAKEN?

### → N°#1: I am interviewing a person with a disability for a position

I am carrying out interviews for a sales representative position. One of the candidates, whose skills and experience merit consideration for the position, has a motor disability. However, I am hesitant to accept his/her application because I feel that our customers may not be comfortable with his/her disability.

#### Conduct to be adopted

Refusing an application on the basis of the reaction (or the assumption of a possible reaction) of others to disability, ethnic origin, or any other consideration based on elements outside the workplace **is a discriminatory practice**. You must make your decision based only on **objective elements**, such as skills and professional experience, which enable it to be established that a candidate is capable of carrying out the work concerned



### → N°#2: An employee I wish to promote is pregnant

One of my employees has been in her position for four years, and she performs very well. I think she has the experience and skills necessary to become a manager in my team, a position I need to create quickly. She has expressed her interest and motivation concerning this position but has also told me that she is expecting her second child.

#### Conduct to be adopted

You must make your decision **based solely on your employee's ability** to take up the position. If this capacity is proven, the creation of the position can be implemented with a short period of adaptation of the mission and organisation of your team.

### → N°#3: A work colleague is wondering what her pay will be during maternity leave

My work colleague is concerned about the impact of her maternity leave (or his paternity leave if the law so provides) on her/his pay and career development.

#### Conduct to be adopted

Encourage your colleague to contact the Human Resources department, which will confirm that the Group guarantees that maternity leave (or paternity leave if the law so provides) will not have a negative impact on their pay and career.



# Environment

## Preservation of the environment

### ➔ The key features of our policy

The Bolloré Group complies with all applicable local environmental laws and makes every effort to preserve the environment.

Any person acting on behalf of the Group must refrain from behaviour contrary to the commitments made. Prohibited behaviours include the degradation or destruction, whether voluntary or involuntary, gradual or accidental, of natural environments (air, soil, surface or ground water), natural resources and ecosystems. The Group is also committed to reducing its greenhouse gas emissions so as to contribute to the objectives of the Paris Agreement. All our subsidiaries are working on strengthening these collective commitments to sustainability and social responsibility.

## WHAT ACTION SHOULD BE TAKEN?

### ➔ N°#1: From time to time, one of my service providers uses practices that pollute the environment

My employer has signed a subcontracting contract with a company. During an informal discussion with one of its representatives, I observed that this company's employees sometimes use polluting products or equipment to carry out their work, in order to reduce costs. However, in its communication, this company claims that it applies and complies with strict environmental standards.

#### Conduct to be adopted

If environmental commitments are part of the contract between you and a service provider, supplier or subcontractor, any failure on their part in this area may result in **the termination of the contractual relationship**. To the same extent as employees, service providers are obliged to comply with the **Bolloré Group's commitments in terms of the environment**, as set out in particular in the *Ethics and CSR Charter*. If you observe a situation that is contrary to expected practices, **report the situation** to your manager, your CSR contact, and to the entity's environmental officer, where appropriate.

### ➔ N°#2: My company's waste management system is insufficient

My entity has set up a waste collection and sorting system, but it is under-used. It is too far away, not very visible and not easily accessible for some people, and does not promote optimal waste treatment. It often seems less restrictive to me to use the standard bin.

#### Conduct to be adopted

In accordance with its environmental commitments, the Bolloré Group encourages its subsidiaries to **implement measures** to limit waste production and **promote recycling solutions as much as possible**. If your entity has deployed a waste sorting system, you must **comply with it** and give your feedback so that measures can be put in place to **improve** the system.





# Protection of personal data and security of information systems



## Protection of personal data

### ➔ The key features of our policy

The digitalisation of business activities requires systems to be put in place to ensure the confidentiality and secure processing of personal data used by companies. In addition to complying with the applicable regulations, the Bolloré Group endeavours to implement technical and organisational measures aimed at protecting the personal data of its employees, as well as that of third parties.

### **Protection of employees' personal data:**

The Bolloré Group has adopted a Personal Data Protection Charter based on five pillars: coordination, fairness, transparency, education and security.

This Charter sets out guidelines for Bolloré Group entities and their employees who process this type of data, and specifies the commitments made by the Group. All Group employees are informed that the destruction, loss, alteration, disclosure or unauthorised access of personal data may violate the rights of the persons concerned and individual and collective freedoms. Employees are the primary enforcers of compliance with this Charter.

### Protection of personal data in our relations with third parties:

Based on the same principles as its Governance Charter, the Bolloré Group has drawn up a Personal Data Protection Charter for third parties (customers, suppliers, public authorities, etc.).

This Charter has two key objectives:

- present the governance of the Bolloré Group;
- set out the guidelines and best practices to be applied.

Through this Charter, the Bolloré Group is reaffirming its commitment to responsible data processing.

## WHAT ACTION SHOULD BE TAKEN?



### → My team is implementing a new tool that makes maximum use of our the personal data of our customers.

A new project calls for the use of a customer database to launch an email promotion campaign for a new product. Does this practice comply with the principles of personal data protection?

#### Conduct to be adopted

Even if such personal data is already in the Group's possession, it may be used only in accordance with the purposes for which it was collected and in accordance with the expectations of the persons concerned, in compliance with the principle of transparency and any more restrictive rules that may apply (consent or opposition, etc.).

→ For further information, **please refer to our Charter** and/or **contact the Data Protection Officer** of your entity.

→ Any project involving the processing of personal data must be **assessed** and approved beforehand **by the Data Protection Officer** of your entity.

→ Group personal data protection charters for employees and third parties:





## Security of information systems

### → The key features of our policy

The Bolloré Group provides its employees with the IT equipment, means of communication and the information and data they require to carry out their tasks. Employees are responsible for using these resources in compliance with the security policy in force, in order to limit the exposure of the Group's information systems to the risk of cyber attacks. Cyber attacks, which aim to illegally obtain sensitive company data or personal information in order to exploit or resell it, can have a significant impact on business: production stoppage, significant unavailability, loss of turnover, etc.

## WHAT ACTION SHOULD BE TAKEN?

### → N°#1: I have received an email asking me to provide bank details

I have received an email from the bank that manages my company's accounts, telling me that they need to provide me with my new access code. To confirm this new code, I must connect to a site and enter my user name and password. How can I make sure that this request is legitimate?

#### Conduct to be adopted

A bank will never ask you for your user name and password. This is clearly an attempt at phishing. If you receive an email from institutions or people with whom you are in contact, asking you to provide confidential or personal information, always be vigilant. Check the spelling in the email, the sender's email domain, the urgency of the request, etc. It could be a malicious individual attempting to steal your login details. If you have inadvertently provided your login details, you must inform your line manager and change your password immediately.

### → N°#2: I can no longer access my files

Several of my colleagues and I have noticed that we can no longer access our files. When we try to open our documents, we get a message saying that the files are encrypted.

#### Conduct to be adopted

This is a ransomware attack. The incident can **spread rapidly** to other systems, affecting the company's productivity. In the event of such an incident, you should **immediately isolate the infected workstations** to prevent the spread of the ransomware and use the emergency communication channels to report the incident to your line management and then to the cybersecurity team for coordinated action at the following address **bse.security.team@bollore.com**.

→ If you have any doubts, we recommend that you send a copy of the email as an attachment to **security.team@bollore.com**.

# Company assets



## Prevention of conflicts of interest

### 🔑 The key features of our policy

All employees must refrain from taking part in decisions on the Bolloré Group when a personal interest (family, financial, associative, political, etc.) is likely to significantly interfere with the independent and objective performance of their duties and affect their ability to act in the interest of the Group.

## WHAT ACTION SHOULD BE TAKEN?

### → A member of my family is recruited by a partner company

I discover that a member of my family has just been recruited as a sales manager for a company with which I am in regular contact for consultancy services. What should I do?

#### Conduct to be adopted

You must **declare this situation**, which may cause a conflict with regard to the interests of the Group, and **refrain from making any decisions** until the authorised persons have completed their analysis. This declaration cannot justify discriminatory measures against you. However, if it is established that this conflict of interest has given rise to **fraudulent or corrupt practices**, you risk **disciplinary sanctions** and/or **legal proceedings**.



→ To find out more, **visit the dedicated space on your intranet** and contact your Compliance Officer or Human Resources Manager.



## Respect for confidentiality

### → The key features of our policy

Excellence and innovation have always been key values in Bolloré Group's strategy. Our manufacturing secrets and know-how are essential to our success, and **preserving this strategic information** hinges on the vigilance of all employees. **No information of a confidential nature concerning the Group's activities may be used, communicated or revealed** without the express authorisation of the Group's Senior Management Division. Furthermore, persons in possession of inside information regarding a company listed on the stock market must **refrain from using this information** to carry out transactions on financial instruments directly or through a third-party intermediary.

## WHAT ACTION SHOULD BE TAKEN?

### → N°#1: Entering into a relationship to extract trade secrets

I receive a request to connect on a professional social network from a recruitment consultant who says he is interested in my profile, academic background and professional experience. As the conversation progresses, my contact becomes increasingly specific in his questions, focusing more on the company's business and manufacturing processes, and he eventually offers me a fair price in exchange for this information.

#### Conduct to be adopted

This situation amounts to **industrial espionage** aimed at extracting industrial or commercial secrets by **illegal means** (bribery, piracy, blackmail, surveillance, violence, identity theft, etc.). This represents a **threat to the Group's interests**. If someone asks you questions about sensitive information relating to the Group's business and the processes, tools and machines used to manufacture its products, you are asked to observe the **utmost discretion**. **Report the incident** in the timeliest possible manner to prevent any leak of strategic information that could compromise our competitiveness, innovation, research and future development.

### → N°#2: A request for an interview at a trade fair

While attending a major trade fair, I was approached by someone who told me he was a journalist and wanted to hear what I thought about an acquisition in progress. I don't think the transaction is public, but the person I spoke to claims to have been informed by a source close to the matter.

#### Conduct to be adopted

We urge you to demonstrate **extreme vigilance** in **disseminating information** on the Group's business activities, particularly on social networks or at trade fairs.

**Do not distribute any information** without first ensuring that it is not confidential, **limit your comments** to information that has been approved beforehand or that is included in institutional communication media (for example, the Universal Registration Document) and **be wary of informal conversations**. Requests for information from journalists should be addressed to the Communication Department, which coordinates relations with the press.



→ For more information on the confidentiality protection system, **contact your Compliance Officer, the Security Department or the Cybersecurity Department**.



# The fight against tax evasion

## → The key features of our policy

The Group ensures that each company and employee **complies strictly with all** the local **tax rules** applicable to its business activities, in all circumstances, and with the attendant obligations, including the payment of tax. The Group also **complies with international principles**, in particular OECD standards.

The management of tax risks, relating primarily to reporting (delays, inaccuracies or failures) or technical issues (misinterpretation), is an integral part of the overall **financial information management** process.

As part of its commitment to a **sustainable approach** to tax management, the Group ensures that its employees and subsidiaries maintain transparent and constructive relations with the relevant tax authorities. In the event of a discrepancy or dispute, under the supervision of the Group Tax Department, the Group's employees and subsidiaries may contest the authorities' position and use all legal means of recourse to assert their position. Where any uncertainty exists, they must seek ways of obtaining sufficient security through the use of qualified external tax advisers or the tax authorities, in liaison with the Group Tax Department.

The Group has **zero tolerance for aggressive** and/or **artificial tax arrangements**. Currently operating in 91 jurisdictions, **the Group's structure meets operational objectives**. As such, the Group refuses to set up subsidiaries without substance in jurisdictions considered to be tax havens or non-cooperative states or territories. Were this to occur, it would be solely as a result of operational activity or an acquisition. In such a case, after analysing the structure, the Group implements the necessary reorganisations to meet its commitments.

The Group may benefit from tax relief mechanisms, such as the allocation of tax credits or deficits. In this event, it takes a **responsible approach** and ensures that the formal and substantive conditions are met.

In any event, the Group Tax Department undertakes to implement the principles and values set out in this Code and to act with integrity.

## WHAT ACTION SHOULD BE TAKEN?

### → I have the possibility of starting a business relationship with a company located in a tax haven

An invitation to tender is issued to a French company of the Group by a company based in a country recognised as offering attractive tax conditions. Can I pursue this relationship?



#### Conduct to be adopted

Business relations with these countries are not **prohibited when they are economically justified**. However, Group companies may not, directly or indirectly, participate in tax fraud or evasion schemes. When business relations are envisaged with these jurisdictions, it is essential to **immediately inform the Group Tax Department** to seek its advice and ensure that a response can be given to the call for tenders.

Part 2

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# **Compliance with the Code of Conduct**





Because individual actions must not compromise the commitment of the Bolloré Group, it is our responsibility to comply with this Code of Conduct.

In accordance with the law, the Code of Conduct is incorporated into the internal rules of procedure of all Group subsidiaries possessing such rules, and is distributed to all their employees. The Code of Conduct is also available on the Group's website to all our commercial partners and must be passed on to them as an integral part of our expectations.

The Bolloré Group does not tolerate any breaches of the Code of Conduct and ensures that it is respected through the effective implementation of a programme inspired by the highest international standards.

# Whistleblowing system

Any person contravening our Code of Conduct may be subject to disciplinary action or legal proceedings in accordance with the applicable law.

If you are aware of any behaviour contrary to our Code of Conduct, we would ask you to report it to us in accordance with the Group's **whistleblowing procedure**. In particular, you can file a report on the [alert.bolloré.com](https://alert.bolloré.com) platform accessible on the Bolloré Group website or any Internet browser.

While this platform allows you to submit a report anonymously, we would ask you to identify yourself to make processing easier.

This platform supplements but does not replace other internal or external reporting methods, which are subject to the same rules of confidentiality and protection.

Whatever its origin, your report will be **treated confidentially** with a view to establishing the materiality of the facts involved. Your identity will be revealed solely to specially authorised persons possessing the necessary skills, authority and resources to carry out this task.

In accordance with the law, **the Group guarantees whistleblowers protection against any form of reprisal.**





# Awareness-raising and training



The Group has implemented an awareness-raising programme to ensure that employees fully understand the Code of Conduct, its constituent policies and the Bolloré Group's whistleblowing system.

Additional training on specific risks and procedures to prevent them is also provided for employees exposed to such risks.

This compulsory training programme must be followed by all new employees and repeated every two years. The proper implementation of these training programmes is monitored, in particular as part of annual performance reviews.

→ For more information on training and procedures, visit the Bolloré Group's training area.



## For more information

If you have any questions about the content of our Code of Conduct and Bolloré Group policies, please consult the specific postings and spaces on our internet and intranet sites or contact the people in charge of implementing them:

[compliance@bollore.com](mailto:compliance@bollore.com)

### COMPLIANCE DEPARTMENT



- The fight against corruption
- The fight against anti-competitive practices
- Compliance with international sanctions and export controls
- The protection of company assets and financial transparency

[rse.groupebollore@bollore.net](mailto:rse.groupebollore@bollore.net)

### CSR DEPARTMENT



- Preservation of the environment

[drhgroupebollore@bollore.net](mailto:drhgroupebollore@bollore.net)

### HUMAN RESOURCES DEPARTMENT



- The respect of human rights
- The protection of the health and safety of individuals
- The fight against discrimination

### DPO DEPARTMENT



- The protection of personal data

[security.team@bollore.com](mailto:security.team@bollore.com)

### CYBERSECURITY DEPARTMENT



- The protection of information systems

**Do not use these addresses to report a breach of the Code of Conduct.**

**To report such breaches, please refer to the whistleblowing system.**



Tour Bolloré  
31-32 quai de Dion-Bouton  
92811 Puteaux Cedex – France  
Tel.: +33 (0)1 46 96 44 33  
Fax: +33 (0)1 46 96 44 22  
[www.bollore.com](http://www.bollore.com)

Compliance Department  
[compliance@bollore.com](mailto:compliance@bollore.com)

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