



## Conflicts of interests' prevention and management Policy

ATALIAN GLOBAL SERVICES

Author: Group Compliance Department

Approval: General Secretary

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For nearly 80 years, the ATALIAN Group has been contributing to the support of companies and organisations in outsourcing services for buildings and occupants by providing personalized solutions that create value.

We operate in tens of thousands of work, living and leisure spaces. We maintain and secure them, we make them healthier, warmer and more functional so as to provide a unique experience for their occupants and users, while ensuring their value as an asset.

Our mission enables organisations to focus on their core business and improve their performance. Taking care of people and their environment is our *raison d'être*.

In order for our approach to be firmly anchored in commitments that correspond to us, ATALIAN Group strives to adopt exemplary behaviour, both individually and collectively.

ATALIAN Group has a zero-tolerance policy with regard to corruption and influence peddling and, to this end, has implemented measures to prevent any situation that could constitute a factor of corruption or influence peddling within the Group. The purpose of the Policy is not to provide an exhaustive list of all risk situations, but to enable employees to understand what is at stake in complying with the Policy and to adopt the right reflexes when faced with a risk situation. The Group Compliance Department is available to all employees should they have any questions.

As employees of the ATALIAN Group, it is important for these principles to guide everyone's reflections and actions on a daily basis.

We expect all employees to behave with integrity, and to comply with the internal policies and procedures.

This Policy is intended to formalise the internal rules applicable to conflicts of interests, as well as their identification, declaration and management.

## OBJECTIVES

The aim of this Policy is to identify, prevent and manage conflict of interests' situations with which ATALIAN Group employees may be confronted in the performance of their duties.

This Policy aims to recall that employees:

- may not enjoy personal benefits for themselves or for related persons as a result of their position within the ATALIAN Group;
- may not engage in professional activities if this may interfere with the interests of the ATALIAN Group;
- may not, directly or indirectly, personally or through related persons, play a role in the governing bodies of other entities that may conflict with the interests of the ATALIAN Group.

In general, it is stressed that any conflict between the personal or professional interests of an ATALIAN Group employee and the interests of the ATALIAN Group itself must be appropriately managed so as to avoid any risk of corruption or influence peddling.

## SCOPE

This Policy applies to all ATALIAN Group employees and is intended to prevent situations in which the personal interests of employees could conflict with the interests of the ATALIAN Group or cause a hindrance to the fairness and integrity of our activities.

### 1. Conflict of interests, definition

It refers to any situation of interference between the function exercised within the ATALIAN Group and a personal interest, so that this interference influences or could influence the independent, impartial and objective exercise of the professional duty of the employee in question. Conflicts of interests can occur in several situations, whether it is a hiring process, sales, purchasing or any other process within the ATALIAN Group.

A conflict of interests is not reprehensible in and of itself, it is the failure to declare a potential or proven conflict of interests that is problematic.

A conflict of interests may be only latent and arise only at the time of a call for tenders or a change involving family or friends. As such, it is essential to declare any potential conflict as soon as possible.

The personal relationships to take into account when considering a conflict of interests are direct family relationships, in-laws, and friendly relationships, even if not close.

It is mandatory to share any conflict of interests with your line manager and make the declaration to the Group compliance department using the form provided for this purpose.

### 2. Identifying a conflict of interests

Conflicts of interests can arise in various forms (personal or family ties, friendship, etc.) and under various circumstances (recruitment, choice of service provider, etc.). They are generally viewed as actual or potential conflicts. It is indeed possible that a third party may also view a particular situation as a conflict of interests.

Conflict of interests' situations generate corruption risks, when, for example, an employee chooses a service provider with whom he/she has friendly ties in order for this friendship to benefit from a contract with the ATALIAN Group, without this service provider having all of the required qualifications, and in consideration of this friendly relationship.

Employees can identify conflicts of interests in several ways:

- by examining their family relationships to determine if they could influence their professional decisions;
- by analysing their other professional activities (if any) or capital holdings or partnerships or associations (notably sports-related);
- by analysing their friendly relationships which may also be professional or work relationships in a similar market in which these people may be suppliers, service providers or customers.

Below are some examples of conflict of interests' situations:

- **In a Purchasing process**, if the ATALIAN Group Purchasing Manager for maintenance supplies has a family member who works for one of the suppliers. This could influence his/her purchasing choices and favour this supplier rather than a competitor offering better conditions.
- **In the case of a direct or indirect financial participation** in a subcontracting company of the ATALIAN Group, the employee in question could be tempted to raise this company's profile and offer it more contracts or with better conditions to the detriment of the ATALIAN Group.
- **In a situation of secondary employment or performance of other duties on a Board of Directors:** a manager or a director sitting on a customer's management committee or supervisory board could be influenced or be in possession of confidential information to the detriment of the ATALIAN Group.

This type of situation can occur at any time and regardless of the hierarchical level. It is essential to cultivate transparency and declare any conflict of interests, even potential.

### 3. Conflict of interests' declaration

The *ad hoc* declaration

Using the form provided for this purpose, all ATALIAN Group employees, regardless of their hierarchical level, are required to disclose to the Group Compliance Department any personal interest that could generate an actual or potential conflict of interest.

These situations may include the following:

- any performance of an activity or holding of interests with a third party in a contractual or pre-contractual relationship with ATALIAN Group;
- any conduct of contractual relations with a parent, relative – or with a company controlled by a parent or relative –, in a contractual or pre-contractual relationship with ATALIAN Group.

The annual declaration

At the same time, employees are required, during the annual campaign coordinated by the Human Resources and Compliance functions, to declare their situations of actual or potential conflicts of interests.

This declaration is intended to report the interests and activities that could be perceived as coming into conflict with the interests of the ATALIAN Group, notably:

- any direct or indirect financial participation in the capital of a company carrying out activities competing with those of ATALIAN Group or one of its entities;
- any function performed within a company that carries out activities competing with those of ATALIAN Group or one of its entities;
- any public elected office;
- any other situation of interference.

#### How to declare

In both of the above cases, the template form to be completed is appended to this Policy and can be found in the dedicated tool.

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- any function performed within a company that carries out activities competing with those of ATALIAN Group or one of its entities;
- any public elected office;
- any other situation of possible interference.

This declaration was dematerialized in 2024, meaning that it can be made via the One trust tool (<https://atalian1.my.onetrust.com/employee-portal/disclosures/yoy/list>).

A declaration campaign will be organised each year as of 1 January 2024, and it will be sent to all employees with an e-mail address.

A detailed guide to the declaration procedure is available in the appendix to this document.

Employees without an e-mail address will not have to complete an annual declaration.

Any declarations revealing conflicts of interests will be analysed by the line manager of the employees in question who will, in consultation with the relevant Human Resources manager and the Compliance Department, issue written measures to manage this conflict.

If you identify a potential conflict of interests outside of the annual declaration period, you should:

- immediately so inform your line manager in writing;
- wait for his/her decision on how to manage this conflict of interests before any other action and immediately exclude yourself from the file in which this conflict situation may be problematic;
- declare it simultaneously in the dedicated tool (<https://atalian1.my.onetrust.com/employee-portal/disclosures/yoy/list>);
- immediately exclude yourself from any relevant file when you realise the existence of a potential conflict of interests that had escaped your vigilance;
- be careful not to seek out confidential information about the situation that could be impacted by the conflict of interests.

#### 4. Evaluation and management of Conflicts of Interests

The review of conflict of interests' situations will consider the following:

- the type of conflict of interests;
- the files / customers being handled by the person;
- the potential impact of the conflict of interests.

These processing measures are appropriate to the nature of the conflict of interests in question, and proportionate to the seriousness of the situation at hand:

- when the conflict of interests' situation is proven and lasting, corrective measures will be taken on a case-by-case basis, in consultation with Human Resources;
- when the conflict of interests is proven and temporary, the employee's duties in the decision-making process in question may be temporarily suspended, in order to entrust them to another person for as long as the conflict of interests persists;
- when the conflict of interests is potential or apparent, any necessary action will be taken to remedy it, thereby preventing the risk of a conflict of interest.

Possible measures notably include removing the employee from the conflict situation, the reassignment of responsibilities or any other means deemed appropriate.

Any failure to declare a conflict of interests constitutes misconduct and a violation of the ATALIAN Group Code of Conduct. Any breach of the Code of Conduct may result in disciplinary action up to and including dismissal. Anyone who has not declared a conflict of interests not only endangers the ATALIAN Group but also his/her own career. It is therefore important for all employees to be vigilant and to ensure that they correctly declare their conflicts of interests during the annual campaigns or during the year if a conflict of interests arises.

## 5. Controls

### First level

- Each manager makes sure to remind his/her team of the obligations under this Policy and ensures its application every three months.

### Second level

- The Compliance Function ensures that this Policy is known and monitors the correct implementation of the annual conflict of interests' declarations by the populations in question. It notably verifies the training provided on the obligations mentioned in this Policy.
- During anti-corruption compliance reviews, it monitors the communication of relevant documents to newcomers and notably checks the processing of ad hoc declarations.
- It looks after the traceability and retention of the submitted declarations, in compliance with the applicable personal data processing rules.

### Third level

- During the deployment of its control plan, the Internal Audit Department ensures that the Policy is applied.

## 6. Ethics whistleblowing line

The ATALIAN Group has set up an external platform for collecting ethical alerts, accessible by all, internally and outside the Group, at <https://ethicslineatalian.com>, which you can also access via Atalink / Compliance, as well as on atalian.com and atalian.fr. Or our new phone number **+90 0800 621 6464**, country organization code is **1944**. This platform can also be used to ask questions or share your questions about certain situations of possible breaches of ethics and of the Code of Conduct.

The confidentiality of the whistleblower's identity, of the facts mentioned in the alert, as well as of the implicated persons, is preserved at all times during the procedure for collecting and processing alerts.

Alerts can be launched anonymously.

The whistleblower acting in good faith has a specific status that protects him/her from any retaliation resulting from the alert and in connection with the reported facts.

These alerts will be processed in accordance with the Policy for collecting and processing ethics alerts, available on Atalink / Compliance, as well as on atalian.com and atalian.fr.



## APPENDIX 1 - Reporting process via the platform

### DECLARATION OF INTERESTS

Ethics are an important element in a company's sustainable performance.

Although everyone must manage a multitude of interests (professional, emotional, political, associative, trade union, religious, etc.), not all interests generate conflicts. Conflicts of interests arise when personal interests conflict with the interests of the ATALIAN Group, which the employee must defend.

Within the ATALIAN Group, the procedure for preventing and managing conflicts of interests sets out the framework to be respected.

Preventing conflicts of interests means first disclosing them: transparency and vigilance are the two keys to preventing conflicts of interests:

- transparency in the context of the duty of loyalty towards the ATALIAN Group by declaring conflicts of interests that could affect it, and by clarifying situations on which there could be doubt; and
- vigilance with regard to potential conflicts of interests. This means being aware of the issue and asking the right questions at the right time, i.e. before entering into discussions, negotiations or taking a decision.

The aim of this review of interests is to identify any particular situations that requires special treatment to reduce the risks for both the Company and the employees concerned.

Here below are the most common forms of interests:

#### Outside interests

The employee or a close relative of the employee holds a shareholding or corporate office in an entity that may be:

- Competing company;
- Company that has a business relationship with the ATALIAN Group or is likely to do so;
- Association/club (sports, think tank, etc.).



#### Family, friendly or emotional interests

The employee and one or more of his/her close relations (spouse, children, brothers and sisters, parents, brothers-in-law and sisters-in-law) work, have worked or are likely to work in the near future for the ATALIAN Group.

Sensitive situations include:

- existence of a relationship of subordination or control;
- Recruitment, appraisal and mobility/promotion;
- Relationships with former colleagues or siblings or friends;
- Emotional relationships.

#### Political interests

The employee or one of his or her close relations is involved in personal life through an elective mandate or political commitment within a party.

## EXAMPLE OF DECLARATION OF INTERESTS

- ▶ Do you (or members of your family - spouse, children, brothers and sisters, brothers-in-law and sisters-in-law) hold any interests in listed or unlisted companies, organisations or associations that have or wish to develop business relations with the ATALIAN Group (supplier, service provider, partner, consultant, etc.) that may affect your judgement?

Concerning myself: YES/NO

Concerning my family: YES/NO

If yes, please specify the name(s) of the company(ies) as well as the percentage held in each company, the name of the other shareholders and the activity of the company:

.....

- ▶ Do any members of your family work for a competitor, service provider, supplier, partner, consultant, etc., of the ATALIAN Group likely to affect your judgement?

YES/NO

If yes, please specify the name of the company and the position held for each person concerned:

.....

- ▶ Do you (or members of your family) hold any executive or non-executive positions or directorships or paid positions in companies, organisations or associations outside the ATALIAN Group that are likely to affect your judgement?

As regards myself: YES /NO

With regard to my family: YES /NO

If yes, please specify the name(s) of the company(ies) or organisation(s) and, for each of them, their activity, the position you hold and, if applicable, the relationship with the ATALIAN Group:

.....

- ▶ Do you (or any member of your family) hold an elected office or are you employed by an administration or local authority?

For myself YES/NO

My family YES/NO

If yes, please specify for each person concerned the nature of the situation, in particular the name of the administration and/or local authority, the position held and the nature of the relationship between the company / association and the ATALIAN Group:

.....

- ▶ Do you (or members of your family) hold positions (voluntary or paid) in organisations, associations or foundations outside the ATALIAN Group that may affect your judgement?

With regard to myself YES/NO

With regard to my family YES/NO

If yes, please specify the name(s) of the company(ies) or organisation(s) and, for each of them, their activity, the position you hold and, if applicable, the relationship with the ATALIAN Group:

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- ▶ Have you identified any other situation(s) likely to expose you to any real or supposed conflict of interests in general or in certain circumstances?

YES/NO

If yes, please specify:

.....

I undertake to keep my managers informed of any new conflict that may arise after the date of signature of this declaration and to send them this updated document.

This declaration of interest is made in accordance with the ATALIAN Group's policy on the prevention and management of conflicts of interests.

Full name

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Position

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Department

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Company

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Done at.....

On ...../...../.....