



Anticorruption Code of Conduct

ATALIAN

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1. A message from the Group Executive Chairman

At ATALIAN, integrity is not just a posture.

It is an essential condition of the trust placed in us by our clients, partners, employees, and all our stakeholders. It is also, I am convinced, one of the foundations of our performance.

Our Group operates in nearly 16 countries, across very diverse regulatory, cultural, and competitive environments. This diversity is a strength—it is also a responsibility. Wherever we operate, we must act according to the same ethical standards, with no exceptions and no compromises.

This Anti-Corruption Code of Conduct reflects the Group's zero-tolerance commitment toward any form of corruption, influence peddling or, more broadly, any behavior contrary to our ethics rules. It applies to everyone—employees, managers, and executives—in all countries where we operate, and to all our dealings with third parties.

This new version was designed based on the risks identified during our risk-mapping exercise conducted in 2025. It is more concrete and more operational, and was developed to help each of us prevent and effectively detect these risks in our day-to-day work—including in situations where the right decision is not always obvious.

That is why I expect everyone, at their level, to know these rules, apply them with sound judgment, and remain vigilant in risky situations. No commercial, operational, or financial objective can justify deviating from these principles. A gain achieved at the expense of ethics is not a gain for ATALIAN—it is a threat to everything we are building together.

Thanks to this Code and the policies associated with it, you will have the guidance you need to adopt the right reflexes and ensure compliance in all our actions and relationships with third parties.

Because complying with this Code means protecting ATALIAN. It means safeguarding our reputation, honoring the trust of our clients and partners, and acting in accordance with the values that sustainably underpin our strategy—and our identity.

If you have any questions or doubts, your manager, your Compliance Contact, or the Group Compliance Department are available to help.

I am counting on everyone's commitment.

Quentin VERCAUTEREN DRUBBEL

Group Executive Chairman

2. Why an Anti-Corruption Code of Conduct?

Established in many countries, the ATALIAN Group is one of the world leaders in Facility Management. It supports companies and organizations in outsourcing services for buildings and occupants, offering tailored, value-creating solutions.

Operating in a variety of environments, the Group delivers an integrated range of services meeting the highest standards. The quality of our services has built our international reputation—a fragile reputation that a single wrongdoing can compromise. Corruption, which is illegal and destructive, harms the economy, sustainable development, and fair competition.

In sometimes complex contexts, our values are the foundation of our ambition: to be a major Facility Management player that places ethics and compliance at the heart of its strategy. Integrity is essential to ensure sustainable growth and strengthen our competitive advantage.

This Anti-Corruption Code of Conduct reflects our zero-tolerance policy against corruption. Its purpose is to prevent and detect any breach of integrity, and to help employees understand and apply ethical rules. It describes the potential risks associated with our activities and provides guidance for handling sensitive situations.

Even if not all situations can be anticipated, everyone must refer to the Group's rules, local specificities, consult the Compliance Department when necessary, and exercise sound judgment. In case of doubt, employees are encouraged to consult their management line or the Group Compliance Department.

It is everyone's responsibility to know, apply, and promote this Anti-Corruption Code of Conduct, as well as the internal policies, in order to embody our commitments to all our partners.

3. What is the Anti-Corruption Code of Conduct?

The Anti-Corruption Code of Conduct, which complements the Code of Ethics, sets out the principles governing our behavior in relation to risks linked to corruption and influence peddling. More specifically:

- It clarifies the rules to be followed, provides practical examples, and reminds you of the right reflexes to adopt;
- It sets out prohibitions and high-risk practices;
- It introduces all the Group's internal policies that detail the processes to be followed, as well as the means to monitor compliance with these processes, thereby ensuring effective prevention and detection. It does not replace applicable laws and regulations, nor any stricter local rules.

Who is this Code intended for?

This Code applies to all ATALIAN employees, regardless of their status, role, contract, or country of work. ATALIAN also expects its suppliers, subcontractors, service providers, partners, intermediaries, and business introducers to comply with equivalent integrity standards.

Preventing corruption is everyone's business: everyone must behave ethically and use the dedicated whistleblowing line if they observe a breach.

How to use the Anti-Corruption Code of Conduct?

This Anti-Corruption Code of Conduct is a reference framework—a guide—helping everyone identify high-risk situations highlighted by the corruption risk mapping and adopt the appropriate behavior. When faced with a high-risk situation, everyone should ask themselves the following questions:

- Is it legal?
- Is it compliant with the Group's rules?
- Is the purpose legitimate?
- Is the situation transparent and traceable?
- Would I be comfortable if this situation became public?

If in doubt, contact your management line, your Compliance Contact, or the Group Compliance Department.

The Anti-Corruption Code of Conduct is supplemented by several internal policies:

- Gifts and invitations;
- Corporate philanthropy and sponsorship;
- Interest representation (lobbying);
- Prevention and management of conflicts of interest;
- Third-party due diligence;

These policies are available via the Compliance Policies page on Atalink.

These policies and this Anti-Corruption Code of Conduct may be updated to take account of new risks the ATALIAN Group may face.

4. Fighting corruption

What is corruption?

Corruption consists, **directly or indirectly**, in proposing, offering, promising, soliciting, or accepting an **undue advantage** so that a person performs, delays, or omits an act related to their duties. It may be:

Active

The act, by an employee or a third party acting on behalf of ATALIAN, of **offering, promising, or giving** an undue advantage to a public or private person in order to obtain favorable treatment.

Passive

The act, by an employee or a third party linked to ATALIAN, of **soliciting or accepting** an undue advantage in order to perform an act contrary to their obligations or to unduly favor a third party.

Corruption may be **public** or **private**, depending on the status of the person involved. The ATALIAN Group applies a **zero-tolerance** policy toward any form of corruption, whatever its form, country, or the value of the advantage;

Corruption risk may arise in particular in the following situations, identified by the corruption risk mapping updated in 2025.

For example:

- Accepting an undue advantage from a subcontractor or supplier in order to register or select them in a tender process, or even to continue the contractual relationship;
- Offering or accepting an undue advantage from a competitor of the ATALIAN Group in exchange for communicating confidential information, for example to win a tender;

- Agreeing to hire employees in return for payment of money or because of personal ties;
- Offering an undue advantage to a public official carrying out an inspection (*tax, social, or even site safety*);

These are risk scenarios against which we must be vigilant and take precautions.

In practical terms, within the ATALIAN Group?

- ▶ Within the ATALIAN Group, corruption could occur in the following situations:
 - ▶ ▶ A sum of money;
 - ▶ ▶ Gifts or invitations (luxury items, travel, covering children's tuition fees, covering various expenses, invitations to prestigious sporting events, etc.);
 - ▶ ▶ A promise of employment;
 - ▶ ▶ Donations, corporate philanthropy, or sponsorship;
 - ▶ ▶ Providing services free of charge (e.g., cleaning or maintenance services) or carrying out work for free.

5. Corruption: practical examples

1. An ATALIAN employee solicits or accepts an undue advantage from a supplier in exchange for validating receipt of an order (products, site works, service, etc.) or for validating a non-compliant worksite (quality standards or order requirements);
2. An ATALIAN employee solicits or accepts an undue advantage from a supplier, service provider, or subcontractor in exchange for validating fictitious services or overbilling for services;
3. An ATALIAN employee solicits or accepts an undue advantage from a supplier, service provider, or subcontractor in exchange for their selection or continued relationship, or even for accepting favorable contractual terms by bypassing the Group's internal rules;
4. An ATALIAN employee offers or gives, directly or through a representative, an undue advantage to a public official or elected representative so that they influence standards applicable to ATALIAN's business or administrative decisions relating to the Group's activity;
5. An ATALIAN employee offers or gives an undue advantage, via an intermediary, to a client of a public entity in exchange for that person favoring the Group in the award of public contracts;
6. An ATALIAN employee offers or gives an undue advantage to a client in exchange for being referenced, obtaining a contract, terms favorable to ATALIAN, or for validating non-compliant/fictitious services;
7. An ATALIAN employee offers or gives an undue advantage to an engineering firm or a project management assistant (AMO) in order to obtain confidential information on clients, competitors, or ongoing tenders;
8. An ATALIAN employee solicits or accepts an undue advantage from a third party to help them harm a client's interests in premises under their supervision (shops, warehouses, deliveries);
9. An ATALIAN employee solicits or accepts an undue advantage from an ATALIAN competitor and, in exchange, discloses confidential information about the ATALIAN Group;

10. An ATALIAN employee offers or gives an undue advantage to a public official responsible for inspecting working and safety conditions at Group sites in order to obtain a favorable outcome to an inspection;
11. An ATALIAN employee offers or gives an undue advantage in order to obtain a favorable outcome in the settlement of a dispute/litigation or to waive penalties with a client.

If in doubt, contact your management line, your Compliance Contact, or the Group Compliance Department.

6. Gifts & invitations

A gift is any tangible item with a market value, given without consideration or compensation. This includes gifts received or given at external events such as trade shows, as well as year-end gifts. Gifts may take many forms and are mainly characterized by the fact that they can be resold or given to someone else.

An invitation is any sign of courtesy or hospitality offered or received in the context of business relationships. Invitations are granted *intuitu personae* and involve the participation of an ATALIAN employee (if no ATALIAN employee is present, the invitation must be treated as a gift).

An invitation may take the form of:

- Business meals.
- Entertainment: cocktail reception, attendance at a sports or cultural event.
- Hospitality package: any travel, accommodation and/or attendance at a professional event (e.g., a site visit organized for a product demonstration).

Gifts and invitations offered or received must be handled with care. Each employee must refer to the **Gifts & Invitations Policy**, in particular regarding thresholds, declarations and required approvals. A gift or invitation is acceptable only if it:

- serves a **legitimate business purpose**,
- is offered or received with **full transparency**,
- remains **reasonable in value and frequency**,
- does not create—neither in fact nor in appearance—an **undue influence** or a **conflict of interest**,
- strictly complies with internal rules, particularly regarding **traceability and declaration**.

Any ambiguous situation or one that could be perceived as an attempt to influence must be **reported without delay** to your management line or to the Compliance Contact.

Do	Don't
▪ Check that the gift or invitation remains reasonable, occasional, and business-related. ▪ Comply with internal thresholds, approvals, and rules: prior authorization from your line manager if above 100 euros, and from the Compliance Department if above 200 euros, using the dedicated form. ▪ Declare the gift or invitation when the procedure requires it in your Region's dedicated register.	▪ Offer or accept a gift during a tender process, a negotiation, or any decision-making phase. ▪ Give or receive cash or any equivalent (gift cards, vouchers, etc.). ▪ Invite a relative or family member without a legitimate business justification and internal approval. ▪ Grant any benefit, in any form, to a public official. ▪ Split or conceal multiple benefits to circumvent the established rules.



CASE STUDY

A chemical products supplier offers you a trip for you and your spouse while contractual terms are under negotiation. Should you accept?

No. A trip clearly exceeds the amounts allowed for a gift and any offer of this kind is prohibited during a negotiation period. The inclusion of a family member further reinforces the inappropriate nature of the offer. Acceptance could compromise the integrity of the business relationship and create legal risks, as well as a loss of trust with our partners.

7. Facilitation payments

A facilitation payment is a sum informally requested by a public official to speed up or unblock an administrative process. Such payments, even of a small amount, constitute a **form of corruption** and are strictly prohibited within the ATALIAN Group, regardless of the country concerned.

Only one exception is permitted: a **serious and imminent threat** to an employee's health or safety. In such a case, the employee must report the incident without delay to their management line or the Compliance Contact and, where appropriate, through the **professional whistleblowing system**. Any amount paid must be immediately documented in a transparent manner;

Do	Don't
▪ Pay fees related to administrative formalities. ▪ Request an invoice, a receipt, or an official payment channel. ▪ Refuse any unofficial payment. ▪	▪ Agree to give a public official funds without a receipt, voucher, or invoice. ▪ Present an illicit payment as a "local custom". ▪ Pay in cash without justification or traceability. ▪ Use a third party to make the payment on your behalf. ▪



CASE STUDY

As branch manager, you urgently need to connect a client's electrical cabinet on a worksite. Otherwise, you risk delay and client dissatisfaction. All documents have been submitted and are ready, but one final authorisation is still missing. You wonder whether a small gratuity to the relevant public official could speed up the process. May you pay that gratuity?

No. Doing so would breach the rules of our Code, which prohibit all facilitation payments, even where the amount is minimal.

8. Influence peddling

Influence peddling consists in offering, promising, soliciting, or accepting an **undue advantage** so that a person uses—actually or supposedly—their influence over a public decision-maker. The offence is established even if the influence invoked does not succeed.

It may be:

- **Active:** offering or promising an advantage to a person claiming they can influence a public decision on behalf of ATALIAN;
- **Passive:** soliciting or accepting an advantage to use one's actual or supposed influence, whether one is a **public official or a private individual**.

ATALIAN applies a **zero-tolerance** policy toward any form of influence peddling, which constitutes a **criminal offence**. Any request or suspicious situation must be **reported immediately** to your management line, the Compliance Contact, or via the professional whistleblowing system.

Do	Don't
▪ Use only official (institutional) channels. ▪ Verify the exact role of any intermediary. ▪ Keep interactions professional, transparent, and traceable. ▪ Report any ambiguous or suspicious proposal.	▪ Agree to give a public official funds without a receipt, voucher, or invoice. ▪ Seek preferential treatment through a personal relationship or network. ▪ Provide a benefit to someone who claims they can "move a case forward".



CASE STUDY

A mayor offers to use his position to influence the technical department of an administration in his region so that it selects the ATALIAN Group as service provider. In return, he asks you to contribute financially to his next campaign. How should you react?

You must refuse and report the matter to your Compliance Officer or to the Compliance Department. The criminal offence of influence peddling exists even if the influence exercised does not make it possible to obtain the expected benefit from the gift or advantage.

9. Corporate philanthropy & sponsorship

Corporate philanthropy is financial or in-kind support provided to a cause, organization, or activity of general interest, **with no consideration**, and may in particular take the form of a donation.

Sponsorship is material and/or financial support provided in exchange for **visibility** or promotional value.

Any corporate philanthropy or sponsorship undertaken in the name of the ATALIAN Group must comply with local legislation, the Group’s political, religious and philosophical neutrality, as well as the **Corporate Philanthropy & Sponsorship Policy**.

These actions must be approved by the dedicated committee, after **reasonable checks** of the beneficiary and of the intended use of the funds. They must under no circumstances aim—or appear to aim—to **influence a business or public decision**, nor create a conflict of interest.

The assessment focuses in particular on the **legitimacy of the project**, the absence of any undue consideration, the beneficiary’s reputation, and tax compliance. Any ambiguous situation must be **reported immediately** to your management line or the Compliance Contact.

Do	Don’t
▪ Check the legitimacy of the objective, the beneficiary, and the proposed action. ▪ Have the initiative approved by the Group committee before making any commitment. ▪ Ensure there is no conflict of interest. ▪ Keep supporting documents and, where applicable, monitor the use of the funds. ▪	▪ Use a donation or sponsorship to obtain or retain business. ▪ Fund an entity linked to a client or a decision-maker—especially a public one—without prior checks. ▪ Accept or propose a donation or corporate philanthropy action in exchange for a commercial contract. ▪



CASE STUDY

A client suggests that you make a donation to a charity in which the client is involved, in return for supporting ATALIAN’s business on its market. May you accept?

No. It is prohibited to accept this proposal because it amounts to an attempted act of corruption. It is also contrary to the ATALIAN Group’s Donations, Patronage and Sponsorship Policy because it does not comply with the Group’s project selection process.

10. Conflicts of interest and interests ties

A conflict of interest arises when an employee’s personal interest, or that of a close relative, influences—or appears to influence—the impartial performance of their duties. It may be actual, potential, or apparent. **Interests ties** (family, professional, financial, or associative) are not misconduct in themselves, but must be identified to prevent any risk.

They must be declared as part of the **annual declaration** provided for by the Conflicts of Interest Policy, or **immediately** whenever a new situation arises.

When a conflict of interest exists, the employee must **report it without delay, withdraw from any relevant decision-making process**, and seek guidance from their management line or the Compliance Contact.

The dedicated policy describes high-risk situations, declaration procedures, and measures designed to ensure transparency, impartiality, and integrity.

Do	Don't
▪ Declare any actual, apparent, or potential conflict of interest. ▪ Withdraw from a decision-making process when your impartiality could be questioned. ▪ Ask your management line or the Compliance Contact to arbitrate, if needed. ▪	▪ Take part in a decision involving a relative or a related company. ▪ Conceal a personal tie (financial or family) that could influence a decision. ▪ Intervene in hiring or in an employee's career management despite a personal interest. ▪



CASE STUDY

As part of selecting temporary staffing firms for a tender, you discover that a company managed by your brother-in-law is on the shortlist, even though you did not take part in the process. What should you do?

You must immediately report this conflict-of-interest situation to your management and withdraw from the process. Your management will ensure that you no longer have access to information related to that selection.

You are seeking to recruit within your team and believe one of your cousins would be a good candidate. What should you do?

This family link creates a potential conflict with the company's interests. You must follow the usual recruitment process through Human Resources in order to ensure an objective selection. In addition, you cannot become that person's direct or indirect line manager. If you believe your cousin may be suitable for another role, you may recommend them transparently, without interfering in the final decision.

11. Lobbying

Interest representation consists in influencing political authorities in order to defend one's economic interests. It is sometimes referred to as lobbying.

Interest representation must be carried out in a transparent, fair, documented manner and in compliance with applicable rules, in particular the **Interest Representation Policy**.

When ATALIAN uses a third party for an interest representation activity, this must be approved in advance, in compliance with the Third-Party Due Diligence Policy.

Interest representation involves engaging in dialogue or interactions with public decision-makers in order to defend or promote the Group's legitimate interests. Any interest representation action must be carried out in a **transparent, fair and documented** manner and in compliance with applicable laws, as well as the **Interest Representation Policy**.

These steps must never aim—nor appear to aim—to obtain an undue advantage, unlawfully influence a public decision, or create a conflict of interest.

When the Group uses a third party to conduct interest representation activities, this must be **approved in advance**, governed by contract, and subject to the **due diligence checks** provided for by internal policies.

Any ambiguous situation or suspicious behavior must be **reported immediately** to your management line, the Compliance Contact, or via the professional whistleblowing system.

Do	Don't
- Comply with internal policies, in particular those related to interest representation, gifts and invitations, and corporate philanthropy and sponsorship. - Maintain fair, transparent, and documented interactions in the context of interest representation. - Ensure that third parties acting on behalf of ATALIAN are contractually governed. - Check local legal requirements before taking any action.	- Pay a public official to speak at an event. - Seek confidential information through indirect or fraudulent means. - Offer a gift, invitation, or any form of hospitality to a public official in order to influence a vote or decision. - Use a third party to circumvent internal rules on interest representation.



CASE STUDY

A public relations firm working for the ATALIAN Group contacts a member of parliament, rapporteur for a bill on cleaning services for companies, and offers that person a personal advantage (for example free home cleaning services) in order to promote awareness of cleaning-related professions, in exchange for a favourable vote during discussions on the bill. Is this authorised?

No. This is strictly prohibited by the rules of this Anti-Corruption Code of Conduct. Moreover, it amounts to an attempted act of public corruption involving a person holding elected office.

12. Business Partners

Business partners are intermediaries paid by ATALIAN to connect the Group with prospects or to facilitate access to business opportunities. Due to the high risk of corruption, any relationship with a business introducer must be strictly controlled.

It must be subject to prior **reasonable checks** (integrity, reputation, track record) and formalized by a **written contract**, including an anti-corruption clause extended to influence peddling. Any remuneration must be **justified, proportionate, and traceable**, and correspond to a real and demonstrable service.

It is prohibited to use a business introducer to circumvent internal rules or to unduly influence a decision. Any ambiguous or suspicious situation must be **reported immediately** to your management line, the Compliance Contact, or via the professional whistleblowing system.

Do	Don't
- Check the introducer's integrity and reputation. - Formalize the relationship through a written contract validated by Compliance. - Ensure that remuneration is proportionate and traceable. - Document every step (due diligence, contract, invoices).	- Pay a business introducer without a genuine service being performed. - Use a business introducer to bypass internal procedures. - Pay commissions in cash or through unofficial channels. - Use intermediaries who have not been approved or assessed. - Let a business introducer interact alone with a public official.



CASE STUDY

A business partner mandated by the ATALIAN Group offers two hospitality seats for the UEFA Champions League final to the technical director of a local authority and to that person's spouse, in order to influence the award of a public contract. Is this authorised? No. This is strictly prohibited by the rules of the Anti-Corruption Code of Conduct. It constitutes an attempt to exert undue influence over a public decision and amounts to a high risk of corruption or influence peddling. A business introducer may under no circumstances offer a personal advantage to a public official on behalf of ATALIAN. Any such situation must be reported immediately to your management or Compliance Officer.

13. Relationships with third parties

Suppliers, subcontractors, service providers, and other operational third parties play an essential role in ATALIAN's activities, but may present a high corruption risk. Any collaboration must comply with the rules defined by the **Third-Party Due Diligence Policy** and by the Sapin II law.

Before entering into any relationship, ATALIAN must conduct **reasonable checks** to assess the third party's integrity, the legitimacy of its activities, and the absence of a corruption track record. A **written contract**, including an anti-corruption clause and audit/control obligations, is mandatory.

During the relationship, the Group must ensure the **reality of the services**, the compliance of invoices, and the justification of payments. Any anomaly, overbilling, or service not performed must be **reported immediately** to Compliance.

Do	Don't
- Carry out an integrity assessment of the third party before any collaboration. - Use a written contract including an anti-corruption clause. - Verify that the services are actually performed and that invoices are compliant. - Ensure payments are traceable and proportionate.	- Work with a third party that has not been assessed or has been rejected by Compliance. - Pay for fictitious or unjustified services. - Use a third party to bypass internal processes.



CAS PRATIQUE

An operations director selects a long-standing supplier without carrying out an integrity assessment or running a competitive process. In return, that director accepts store vouchers from that supplier. Is this allowed?

No. This situation constitutes a serious breach of the rules of the Anti-Corruption Code of Conduct. It amounts to a form of private corruption based on an undue advantage received in exchange for a biased commercial decision. Using a third party without prior assessment, combined with acceptance of a personal advantage, is strictly prohibited. Any employee must immediately report such conduct to management or the Compliance Officer.

14. Whistleblowing system

Any suspected breach of integrity must be reported to your management line, the Compliance Contact, the **Group Compliance Department**, or via the **professional whistleblowing system**.

The ATALIAN Group has implemented an external platform for collecting whistleblowing reports, accessible to everyone—internally and externally—by phone or via the address ethicslineatalian.com. You can also access it via Atalink, atalian.com and atalian.fr. This platform can also be used to report suspected breaches of the Anti-Corruption Code of Conduct, in particular.

The confidentiality of the whistleblower's identity, the facts reported, and the persons implicated is preserved at all times during the reporting and processing procedure. Reports may be made anonymously. A whistleblower acting in good faith benefits from a specific status that protects them from any retaliation related to their report and the facts reported.

All reports are processed in accordance with the Whistleblowing Reporting and Processing Policy, available on Atalink, atalian.com and atalian.fr.

15. Sanctions

Any violation of this Code or the associated policies exposes the employee to **disciplinary measures**, in accordance with the Group's internal regulations, which may range from a warning to dismissal.

Such breaches may also result in **civil, administrative, or criminal penalties**, particularly in relation to corruption or influence peddling. Penalties provided by law may include fines and imprisonment.

Sanctions rules apply to **all employees**, without exception, and are implemented with due respect for the rights of the defense. Any suspicious situation must be reported to the management line, the Compliance Contact, or via the professional whistleblowing system.