



EXPECTATIONS OF OUR PARTNERS

For the Altrad Group, integrity is an essential condition for conducting business, not only because national and international regulations have increased the risks and negative consequences of illegal or illicit behaviour, but also because integrity helps to ensure the Group's stability and sustainability.

The Altrad Group defines itself by its values of **respect, courage, solidarity, humility and conviviality**, values that go hand in hand with its success. All Altrad Group activities must be conducted in a transparent and ethical manner, and in accordance with the laws of each country in which the Altrad Group operates, including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and the Sapin II Law.

The Policies and Procedures issued by the Altrad Group reflect the Group's strong commitment to integrity and business ethics, as well as its commitment to **zero tolerance of illegal practices**. These policies apply to all Altrad Group Partners.

The term "**Partner**" refers to any third party, person or organisation with which Altrad Group companies are in contact, including in particular current or potential customers, suppliers, distributors, commercial contacts, agents, advisors and public and government bodies, including their advisors, representatives and agents, well as associations or their representatives.

Partners are expected to adhere to and act in accordance with the Altrad Group's commitments to integrity and ethics. Altrad Group management at all levels will ensure that Partners understand and comply with these requirements.

Respect for the Altrad Group's values is a priority for its management. Consequently, the Group reserves the right not to work with Partners who do not respect these values.

This Policy also results from the Group's legal obligations and the Altrad Group reserves the right to modify it at any time and without prior notice.

Date	Type	Editor	Approver	Review
02/04/2019	Creation of the Policy	AH	RO	1
16/09/2020	Revision of the Policy in line with the recommendations of the French Anti-Corruption Agency	AND	RO	2
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1 Business Ethics and Integrity

The Altrad Group requires its Partners to **conduct** their activities **ethically and with integrity**, in **compliance with the legislation** applicable to them and with the values of the Altrad Group. These obligations cover, in particular, the fight against fraud and corruption, respect for human rights and applicable rules on the protection of personal data compliance with international economic sanctions and rules on fair competition.

Altrad Group companies comply with the international economic sanctions applicable to them and require Partners to comply with the legislation applicable to international economic sanctions.

Partners undertake to communicate to Altrad Group companies all export restriction information concerning the controlled products offered for sale and to provide the export control classification numbers for these products or services.

The Altrad Group does not allow its Partners to engage in anti-competitive practices, such as price fixing agreements, manipulation of tenders or abuse of a dominant market position and expects its Partners to act in accordance with applicable competition law.

The Altrad Group applies a zero tolerance policy towards all forms of fraud and corruption. We therefore ask our Partners to take all necessary measures to comply with all applicable local and international laws, regulations and treaties to fight, detect and prevent corruption.

Partners shall not, directly or indirectly, offer, solicit or receive bribes from or on behalf of any member of the Altrad Group. Partners shall refrain from offering, giving or proposing, directly or indirectly, bribes to a member of the Altrad Group.

The Altrad Group's zero tolerance of corruption extends to all forms of bribery, including facilitation payments to members of government, customs and other public officials.

Partners undertake to put in place processes and procedures to proactively prevent and detect fraud and corruption. Partners also undertake to provide training for their staff on these subjects.

2 Getting to know your partner

The Altrad Group has policies and procedures for knowing its Partners entitled "**KYP- Know Your Partner**". These procedures are implemented by the Altrad Group Compliance Department for all its subsidiaries and are centralised via the "Gan Integrity" platform.

In accordance with legal obligations and the Altrad Group compliance programme, it is important for Altrad Group companies to ensure the integrity of the Partners with whom they establish business relations. Consequently, all companies or persons wishing to work with Altrad Group companies, here defined as "the Partners", must be subject to an integrity check via screening tools in a proportionate and appropriate manner with regard to the transaction carried out and the parties involved.

Depending on the information available and the Partner's history, risk mitigation measures such as sending a questionnaire or additional documents or providing proof of staff training may be requested from the Partner at the request of the Compliance department

Refusal to provide the documents required to carry out the KYP procedure, including information concerning the directors or beneficial owners, may make it impossible to enter into or maintain a business relationship with the Partner.

The integrity of the Partner and the risks it presents are assessed and monitored throughout the life of the business relationship. Consequently, the Partner may regularly receive a questionnaire by email or directly via the GAN platform. In any event, failure to respond to a questionnaire sent by the Altrad Group may alter the commercial relationship with the Partner.

Failure to comply with the procedures, refusal to cooperate in the implementation of risk mitigation procedures or communication of incorrect information may be considered a contractual default and the Altrad Group may terminate the commercial relationship with the Partner to the exclusive detriment of the latter.

3 Gifts and Invitations

A gift is the donation of an object intended to please someone. The Altrad Group gives preference to gifts bearing the company logo and/or corresponding to local customs. The Altrad Group refuses any gift in monetary or equivalent form such as **shopping vouchers and gift cards**

An invitation is the act of carrying out an activity with the aim of creating or maintaining a business relationship, such as going to a restaurant, attending a match or taking part in a tournament. The Altrad Group refuses to grant or receive invitations that include the guest's travel and accommodation expenses.

The sole purpose of offering or accepting gifts and/or invitations must be :

- establish or maintain good business relations ;
- improve the Group's image; and/or
- to market or present products and/or services effectively.

To be accepted by Altrad Group employees, gifts and/or invitations must comply with the law, be reasonable, appropriate and transparent. Their frequency must be reasonable and they must never be offered with the intention of influencing the recipient, obtaining a commercial advantage, rewarding the granting of a commercial advantage, or constituting an explicit or implicit exchange of favours or advantages.

Gifts must be appropriate in terms of circumstances, intent, timing and value. Gifts must be offered publicly and comply with locally applicable law.

Whatever the circumstances, the gift or invitation must be reasonable and justifiable. Intent and timing must always be taken into account

Within the Altrad Group, all gifts and invitations offered or received are declared in the "Gifts and Invitations" section of the Altrad Group Compliance Platform. The declaration includes the name of the company and the person receiving and offering the gift or invitation.

We will encourage our Partners to declare these gifts or invitations to their management in accordance with their company's internal procedures.

4 Conflict of interest

A Conflict of Interest arises when an Employee's personal interests conflict with his or her professional interests, in particular that of acting in the best interests of the company employing him or her

Altrad Group employees are required to declare all potential Links of Interest via the Gan platform. Altrad Group Partners also undertake to declare any link of interest with an Altrad Group employee or manager directly to the Compliance Department at compliance@altrad.com or via the KYP documents completed as part of the integrity assessment.

The Altrad Group implements procedures to prevent links of interest from becoming a situation of conflict of interest that could harm the transparency and integrity of the relationship between the Partner and the Altrad Group.

5 Respect for human rights

The Partners undertake to respect the principles of the Universal Declaration of Human Rights, the International Labour Organisation and the Organisation for Economic Co-operation and Development (OECD).

The Altrad Group's priority is the well-being and safety of its employees and the employees of Partner companies. We will not tolerate any form of undeclared work, including slavery, servitude, forced or compulsory labour, child labour and human trafficking.

Altrad Group Partners guarantee a safe and healthy working environment by complying with the health and safety rules, laws and regulations in force.

The Partners undertake to guarantee their employees a respectful working environment, free from any discrimination based on age, disability, gender, beliefs, ethnic origin or nationality.

6 Internal Alert

An internal alert is the communication to the Altrad Group of information relating to alleged dangers in the workplace or to reprehensible acts by or against an Altrad Group employee.

The whistleblowing system is part of the compliance programme deployed by the Altrad Group. It ensures the effectiveness of the procedures deployed and is a legal obligation under :

- Act no. 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life, known as the "Sapin II Act",
- the UK Bribery Act of 8 April 2010, known as the "UKBA",
- Act no. 2017-399 of 27 March 2017 on the duty of care of parent companies and ordering companies,
- European Directive 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law.

The alert system can be used by all Partners via one of the following channels:

- send a report online via the Altrad Group Compliance platform: <https://altrad.gan-compliance.com/> or via the QR Code below:



- send an email to the Compliance department: . compliance@altrad.com

Reports are centralised in the Gan alert management platform and are received by the Group Compliance Department. The recipients of the alerts are qualified lawyers based France who are bound by strict confidentiality of the information provided, which in any event is used only for the purposes of analysing, processing and investigating the alerts.

If the preliminary analysis shows that the alert falls within the scope of the whistleblowing system, the Head of Compliance will inform the person making the alert that it is admissible and of the reasonable and foreseeable time required to investigate the allegations made.

The Altrad Group undertakes to analyse the admissibility of all reports received, to carry out an investigation where necessary and, in any event, to ensure the confidentiality of the procedure. A specific policy is in place and published on the Altrad Group website. It enables all Partners working for or with the Altrad Group to make a report, in complete confidentiality, without fear of reprisals.

The Altrad Group understands that potential whistleblowers may be concerned about the possible repercussions of their reporting. We guarantee that the identity of the whistleblower will remain strictly confidential and will not be disclosed (except to judicial authorities where required) unless the whistleblower has given his or her express consent.

The Altrad Group takes all necessary precautions to preserve the security of personal data collected as part of the alert system, in accordance with the recommendations of the French Data Protection Authority (CNIL), in order to prevent data from being distorted, damaged or accessed by unauthorised third parties.