



# CODE OF CONDUCT

Working together  
for a better world

AIRVANCE   
GROUP

## Anti-corruption code of conduct

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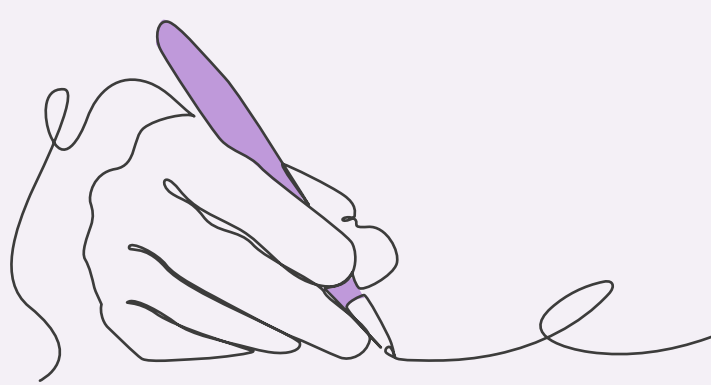


## Local adaptation authorisation

This Code of Conduct may include local adaptations incorporating risks identified by local laws and practices. These amendments shall be officially set out by the Managing Director of the subsidiary concerned, and validated by the Zone Manager and the Ethics Committee.

As this Code of Conduct is appended to internal regulations, it is not possible to amend, modify or change this code unilaterally at a local level.

These prerogatives remain within the competence of the Ethics Committee, which shall submit the contemplated modifications to the personnel representative bodies in countries which require this.



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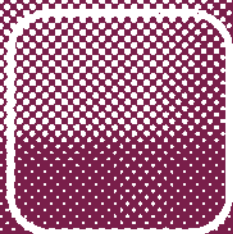
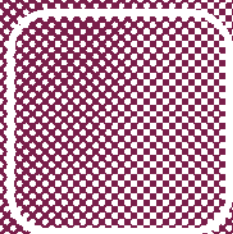
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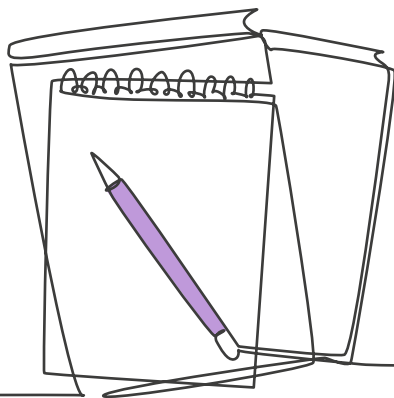
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Scope: AIRVANCE Group



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# DOCUMENT OBJECTIVE



## Document objective

Under application of the SAPIN Act II<sup>1</sup>, the present document sets out to specify certain principles set out in the AIRVANCE Group Ethics Code. In particular, it presents the rules applicable to:

- Management of restaurant invitations (page 14).
- Management of gifts (page 15).
- Management of event invitations (page 16).
- Management of patronage and sponsorship activities (pages 17/18).
- Management of conflicts of interest (pages 19/20/21).
- Management of commercial operations (page 22).
- Management of commercial intermediaries and agents (page 23).
- Management of lobbying activities (page 24).
- Management of political activities (page 25).

**This document comprises general provisions applicable to AIRVANCE Group as a whole, and its employees, plus details relating to the specific amounts and provisions for individual countries which can be found in Part 8 "Country details".**

<sup>1</sup> Text aimed at strengthening the fight against corruption, applicable to companies with a workforce of more than 500, and a turnover above 100 million euros.

For a summary presentation of the text, see:

[www.economie.gouv.fr/details/details/PDF/20160606\\_principales\\_mesures\\_pjl\\_sapin2.PDF](http://www.economie.gouv.fr/details/details/PDF/20160606_principales_mesures_pjl_sapin2.PDF)





# SCOPE



## Scope

The rules and principles set out in the present document apply to:

- **AIRVANCE** Group, and to all its subsidiaries.
- All internal workers<sup>2</sup> and external workers<sup>3</sup> of **AIRVANCE** Group and its subsidiaries.
- **AIRVANCE** Group third parties (mainly suppliers, customers, service providers, etc), within the framework of transactions entered into by the Group with them.

<sup>2</sup> The term "Internal employee" refers to any individual holding a work contract or office with one of the Group entities.

<sup>3</sup> The term "External employee" refers to any natural person not holding a **AIRVANCE** work contract, who is assigned work for one or more Group subsidiaries.



# DEFINITIONS

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## Corruption

While there are numerous definitions of corruption, we have decided to adopt the one derived from the French Penal Code.

**Active corruption** <sup>4</sup> is the action by any individual (the corruptor) of tendering or granting a public official, at any time, directly or indirectly, offers, promises, gifts, presents or any sort of advantages, whether for this agent or for another, in order to perform or refrain from performing an action relating to their position (consideration).

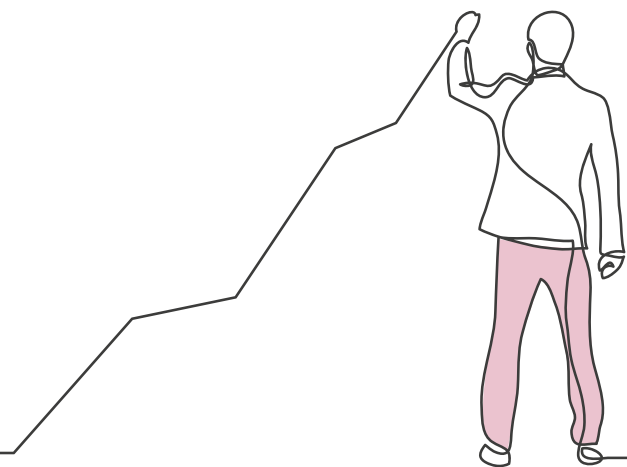
**Passive corruption** <sup>5</sup> is the action by a public official (the corruptee) of requesting or accepting, without underlying right, at any time, directly or indirectly, offers, promises, gifts, presents or any sort of advantages, whether for themselves or for another, in order to perform or refrain from performing an action relating to their position, or facilitated thereby (consideration).

**Private corruption** <sup>6</sup> (active or passive) corresponds to the same actions, except that the corruptee shall not be a public official, but an individual performing private functions.

<sup>4</sup> Article 433-1 1° of the French Penal Code

<sup>5</sup> Article 432-11 1° of the French Penal Code

<sup>6</sup> Articles 445-1 to 445-2-1 of the French Penal Code



## Influence peddling

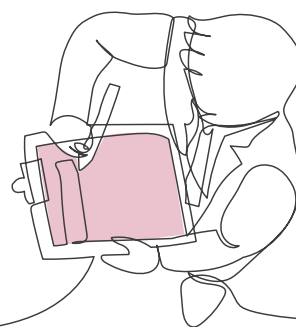
**Active influence peddling** <sup>7</sup> is the action by any individual of tendering or granting an individual, without underlying right, at any time, directly or indirectly, offers, promises, gifts, presents or any sort of advantages, whether for this individual or for another, in order to abuse or for already abusing their actual or supposed influence, with a view to obtaining from an authority or a public administration distinctions, jobs, contracts or any other favourable decision.

**Passive influence peddling** <sup>8</sup> is the action by any individual of requesting or accepting, without underlying right, at any time, directly or indirectly, offers, promises, gifts, presents or any sort of advantages, whether for themselves or for another, in order to abuse or for already abusing their actual or supposed influence, with a view to obtaining from an authority or a public administration distinctions, jobs, contracts or any other favourable decision.

<sup>7</sup> Articles 433-1 2° and 433-2 paragraph 2 of the French Penal Code


<sup>8</sup> Provided for by various articles of the French Penal Code, considering the capacity of its perpetrator: articles 432-11 2° and 433-2 paragraph 1 of the French Penal Code





## Public official

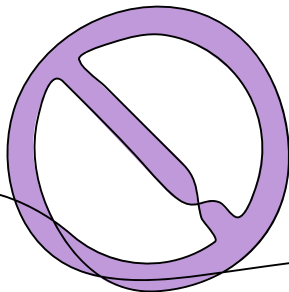
The term **public official** encompasses both politically exposed persons and those acting in an official capacity for national, local or municipal administrations, for international public organisations, associations or public bodies, judicial or administrative courts, as well as individuals performing public duties within an association(s) or organisation(s) receiving public funding, or within public corporations, including anyone acting on behalf of or having a significant influence on the above-mentioned persons.



# **RULES OF CONDUCT**

# 4





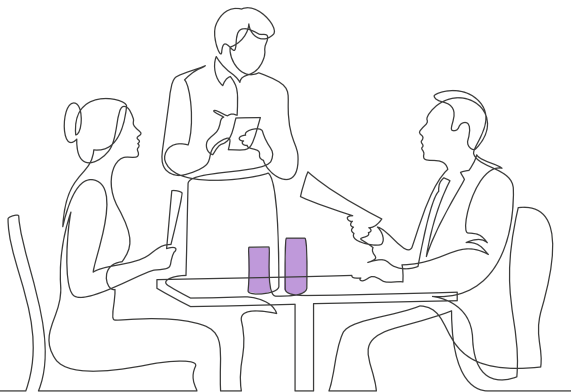
## Zero tolerance

**Corruption, in all its forms, is prohibited in AIRVANCE Group.**

In accordance with current legislation, **AIRVANCE** Group applies a zero tolerance policy to acts of corruption, influence peddling or conflicts of interest. In our interest, as well as in that of Society as a whole, we expect you to report any corrupt practice of which you become aware, based on the internal whistleblowing submission and processing procedure.

### General principles and rules:

- The situations described in this code are appraised via a principle of reciprocity: from inside to outside and/or from outside to inside.
- Gifts/invitations (given and/or received) are **NOT** prohibited.
- However, it is **PROHIBITED** to **REQUEST** gifts/invitations.
- You are prohibited from accepting gifts/invitations (received or offered) in particular when:
  - A public call for tenders is in progress (or immediately afterwards).
  - A dispute is in progress.
  - They would be in breach of criminal law (drugs, prostitution, etc).
- Gifts/invitations received must be brought to the attention of your line manager in writing, if they have a value of more than the amount indicated in your country's descriptions table.
- Any gift/invitation offered (to a customer, partner, public official, etc) with a value of more than the amount indicated in the table in your country's descriptions table, requires the prior approval of your line manager.
- Before offering a gift/invitation to a public official, you must find out about the rules applicable to them (eg: in certain countries gifts/invitations to public officials are **PROHIBITED**). Please contact the "Corporate Legal Service" in case of doubt.



## Management of restaurant invitations

The general principles and rules stated above on page 13 remain valid.

Restaurant invitations with individuals from outside the company (given and/or received) must be brought to the attention of your line manager in writing, if they have a value of more than the amount indicated in your country's details table (amount per head at a restaurant, see Part 8: "Country details"). Invitations with individuals from inside the company remain subject to expense policies.

The objective of the table below is to help you assess the various situations that you might encounter. If you find yourself in a "No" situation, please approach your line manager.

### Yes!

- Question the legality and logic of the invitation.
- Request an exemption from your line manager if the invitation exceeds the authorised amount.
- Refer to the legislation before inviting a public official.

### No!

- Do not accept or make an invitation in a conflict situation, a call for tenders or just before or after such a situation.
- Do not ask to be invited to a restaurant.
- Do not accept or offer an invitation during a call for tenders or a dispute.
- Do not exceed the authorised amount without requesting an exemption from your line manager.





# Management of gifts

## Definition:

The term gift refers to any payment, tip, present or advantage granted, promised or received in the form of: goods, equipment, sums of money, loans, advances, gift vouchers or cards, personal discounts, free services and any form of favourable treatment.

## Principles and rules:

**The general principles and rules stated above on page 13 remain valid.**

- Gifts (given and/or received) must be brought in writing to the attention of your line manager, if they have a value of more than the amount indicated in your country's details table (amount per gift, see Part 8: "Country details").
- "Good practice" refers to the act of sharing gifts received with your co-workers and/or individuals associated with the job, as soon as possible (eg bottles of wine received from a supplier for Christmas).
- Gifts offered/received in financial form (loans, cash, gift vouchers or equivalent) are **PROHIBITED**.

The objective of the table below is to help you assess the various situations that you might encounter. If you find yourself in a "No" situation, please approach your line manager.



- Question the legality and logic of the gift.
- Request an exemption from your line manager if the gift exceeds the authorised amount.
- Refer to the legislation before offering a gift to a public official.
- Wherever possible, share the gift with your team.



- Do not accept or offer a gift in a conflict situation, a call for tenders or just before or after such a situation.
- Do not ask for a gift.
- Do not exceed the authorised amount without requesting an exemption from your line manager.

# Management of event invitations



## Definition:

Events (seminars, conferences, parties, etc) aimed at our prospects and/or our customers and/or our partners are prone to entail risks of corruption, and must therefore be subject to particular attention.

## Principles and rules:

**The general principles and rules stated above on page 13 remain valid.**

- Any event (invitations granted and/or received) with a budget above the amount per head stated in your country's details table (see Part 8: "Country details" for the amount) requires the prior approval of your line manager.
- Subsistence expenses may still be covered by the inviters. Conversely, travel expenses (air, train, taxis) and accommodation expenses (hotel) must still be covered by the invitees.
- An event must have a reasonable duration (2 days maximum).
- Events outside of weekdays and lasting more than 2 days must be avoided as far as possible, and otherwise be brought to the knowledge of the line manager.

The objective of the table below is to help you assess the various situations that you might encounter. If you find yourself in a "No" situation, please approach your line manager.



**Yes!**

- Question the legality and logic of the invitation.
- Request an exemption from your line manager if the invitation exceeds the authorised amount.
- Refer to the legislation before inviting a public official.
- Make sure that the event is professional (venue, detailed professional agenda, etc).



**No!**

- Do not ask to be invited to an event.
- Do not accept or make an invitation in a conflict situation, a call for tenders or just before or after such a situation.
- Do not exceed the authorised amount without requesting an exemption from your line manager.





## Management of patronage and sponsorship activities

### Definition:

**Patronage:** This refers to material or financial support provided in the form of a gift, without anything being offered in return, to a non-profit organisation in order to carry out philanthropic, educational, scientific, social, humanitarian, sporting, family or cultural activities in the public interest.

**Sponsorship:** This refers to material support where something is offered in return (eg: advertising) from the sponsored organisation.

### Principles and rules:

As a company, we aim to support bodies or initiatives in the public interest, through patronage or sponsorship actions with a direct link to our ecosystem, where an employee is personally involved in the actions concerned.

A host of initiatives are already being conducted within the Group subsidiaries. Hence with a view to centralising, adjudicating and raising the profile of all these actions, we would ask you to systematically consult your designated contact Ms. **Karina Gleich**, for any future patronage and sponsorship actions.

**Please e-mail her your plans at the address:**  
**[karina.gleich@airvancegroup.com](mailto:karina.gleich@airvancegroup.com)**

## Management of patronage and sponsorship activities

The objective of the table below is to help you assess the various situations that you might encounter. If you find yourself in a "No" situation, please approach your line manager.

### Yes!

- Question the legality and logic of this patronage or sponsorship.
- Send your sponsorship or patronage request to Mr. Laurent Dolbeau via Ms. Karina Gleich.
- Pass on a request directly linked to Group employees.
- Make sure that the association is transparent in terms of its objectives, actions, members, country of residence, etc.

### No!

- Do not send a request which comes under a business relationship.
- Do not send a request which is aimed at financing a political party or politician.
- Do not send a request in a conflict situation, a call for tenders or just before or after such a situation with a third party.
- Do not make a donation request if the association has been recommended to us by a civil servant or elected representative, and/or the donation request has been insistent or recurrent.
- Do not send a request linked to a sector regarded as high-risk (presence of politicians, public officials, high media exposure).

## Management of conflicts of interest



### Definition:

According to a currently accepted definition, a conflict of interest refers to any situation, whether potential, apparent or proven, in which an employee possesses an interest, direct or indirect, material or otherwise, potentially influencing how they or any other employee perform their functions or responsibilities within the Group.

Put another way, a conflict of interest refers to any situation where the personal interests of an employee and/or external stakeholder could come into conflict with those of their companies.

Conflicts of interest are not illegal by nature. However, they must be clearly and quickly identified insofar as they could entail, due to the lack of objectivity that they might cause, decisions potentially contrary to the company's interest.

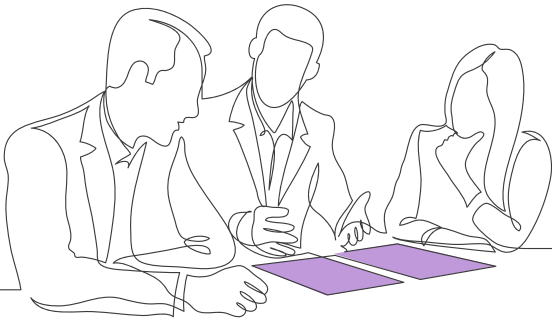
### Principles and rules:

Any **AIRVANCE** Group employee, as defined above in this document, is obliged to declare any conflict of interest situation (potential, proven or actual) relating to them.

This declaration must ideally be made as soon as an apparent or potential conflict of interest situation is identified.

So conflicts of interest must be clearly identified and declared to your line manager, the situation shall be reported depending on the circumstances up the chain of command, and possibly to the regional managers or Exec. Comm. Members.





## ( Management of conflicts of interest

### Examples of conflicts of interest:

For example, some traditional cases of conflict of interest situations are presented below (non-exhaustive list):

- Existence of interest in a company, association, or with anyone involved in a business relationship with **AIRVANCE** Group. This interest may be direct (stake in the capital, existence of a corporate appointment in the entity, etc) or indirect (family tie or friendship with Board Members, directors or managers of this company).
- Existence of a personal extra-professional tie with an employee subject to a direct or indirect relationship of authority or subordination, whether permanent or temporary (for example for a specific project), which might be detrimental to the independence and freedom of judgement of this employee.
- Hiring a public official or any individual holding public office (eg auditors) who has also performed inspection and/or supervisory activities on one or more Group companies.
- Hiring an employee previously belonging to an organisation responsible for grading, assessing or certifying one or more **AIRVANCE** Group companies.
- Purchasing tangible or intangible goods for the purposes of renting or selling it to **AIRVANCE** Group.
- Using confidential information obtained as an **AIRVANCE** Group employee, in order to profit or take advantage from it, whether personally or for a third party.
- Existence of a romantic relationship with another employee of the Group or its subsidiaries.

## Management of conflicts of interest

The objective of the table below is to help you assess the various situations that you might encounter. If you find yourself in a "No" situation, please approach your line manager.

### Yes!

- I comply with the internal policy on conflicts of interest.
- I report any potential or proven conflict to my line manager.
- I inform my line manager if a new conflict of interest arises.

### No!

- I do not report any potential or proven conflict of interest, and maintain a business relationship with the individual concerned.
- I use my situation or status to indirectly influence the decision to purchase goods or supplies from a company in which a close friend, family member or associate has a direct financial interest.



## Management of commercial operations

### Definition:

Commercial operations are taken to mean (non-exhaustive list): promotions, stock clearances, goodwill gestures or loyalty programmes.

### Principles and rules:

Commercial operations are **NOT PROHIBITED**.

On the one hand, they must be subject to the authorisation and validation of the Sales Director, or if applicable the Subsidiary Director. On the other hand, they must comply with local laws.





## Commercial agents and intermediaries

### Definition:

The term intermediary refers to any individual or entity (e.g.: consultant, adviser, agent or commercial partner) acting, negotiating or speaking on behalf of **AIRVANCE** Group and its subsidiaries, or representing its interests, for the purpose of identifying commercial opportunities, negotiating or signing contracts, and promoting the products and services of our group, **AIRVANCE**.

### Principles and rules:

- Use of intermediaries is **NOT PROHIBITED**.
- Any new intermediary (as per the definition above), especially when suggested/imposed by a customer/prospect, requires the prior and formal approval of the Zone Director, or failing that the General Management of the Group, if the latter is based in a country with a CPI score under 70 in the Transparency International index (see: <https://www.transparency.org/en/cpi/2022>).
- An economic intelligence assignment aimed at assessing the integrity of the intermediary must be undertaken if the latter is located in a country with a score under 30 in the Transparency International index.
- Any relationship with a temporary employee must be governed by a contract. Any exception to this rule requires the prior approval of the Zone Director, or failing that of the Group's General Management.
- The intermediaries must be remunerated in the countries where they are resident for tax purposes. Any exception to this rule requires the prior approval of the Zone Director, or failing that the General Management of the Group.



## Management of lobbying activities

### Definition:

**AIRVANCE** Group defines lobbying as the completely transparent provision of pertinent information potentially usable to enlighten public decision-making. Hence it involves publicising and legitimising the activities of **AIRVANCE** Group and its subsidiaries with public decision-making bodies, so as to provide them with a technical appraisal aiding the development of our business.

### Principles and rules:

- The Group does not prohibit lobbying actions, either directly (by one of its employees) or indirectly (via professional partnerships, specialist firms, etc).
- Any use of a specialist entity in lobbying actions requires prior approval of the Marketing and Strategy Division.
- Participation in any new professional partnership requires the prior approval of the Management of the local entity.
- It is the responsibility of the Marketing and Strategy Division to ensure that any new professional partnership is registered on the French HATVP site [High Authority for Transparency in Public Life] ([www.hatvp.fr/le-repertoire](http://www.hatvp.fr/le-repertoire)), or its foreign equivalent (if applicable).
- Any hiring by **AIRVANCE** Group and its subsidiaries of a public decision-maker (either serving or who has been in public office within the past 5 years) must be subject to a prior check by the Human Resources Division (in order to ensure that the company meets the possible qualifying period applicable to the individual concerned, the absence of conflicts of interest, etc).
- **AIRVANCE** Group and its subsidiaries shall refrain from appointing or remunerating individuals in public office to represent or promote its interests.



## Management of political activities

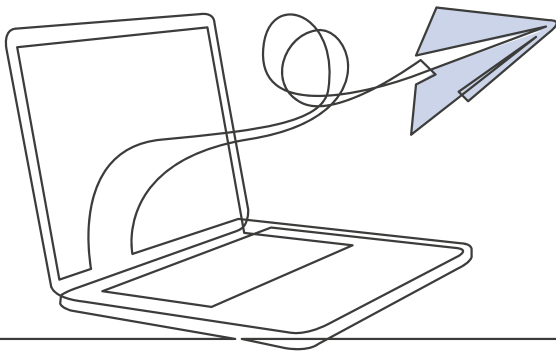
**AIRVANCE** Group respects the freedom of political opinion of each and every one of its employees. However, political donations and contributions, as well as sponsorship of any political party, candidate or political cause involving the Group's image and/or finance are formally prohibited, and reserved exclusively for the General Management of the Group.



# HOW TO REPORT A SITUATION?

HOW TO REPORT A SITUATION?

5



## How to report a situation?

Generally speaking, the right to whistleblow consists in the individual's ability to report fraudulent behaviour or serious risks.

The whistleblowing submission procedure implemented within **AIRVANCE** guarantees strict confidentiality of the identity of the whistleblowers, the individuals reported and the information gathered by all the recipients.

You can send a report from a personal or professional e-mail, to: [ethicline@airvancegroup.com](mailto:ethicline@airvancegroup.com), with the explicit wording "**Private and confidential**" in the subject line.

### The recipients of this e-mail are:

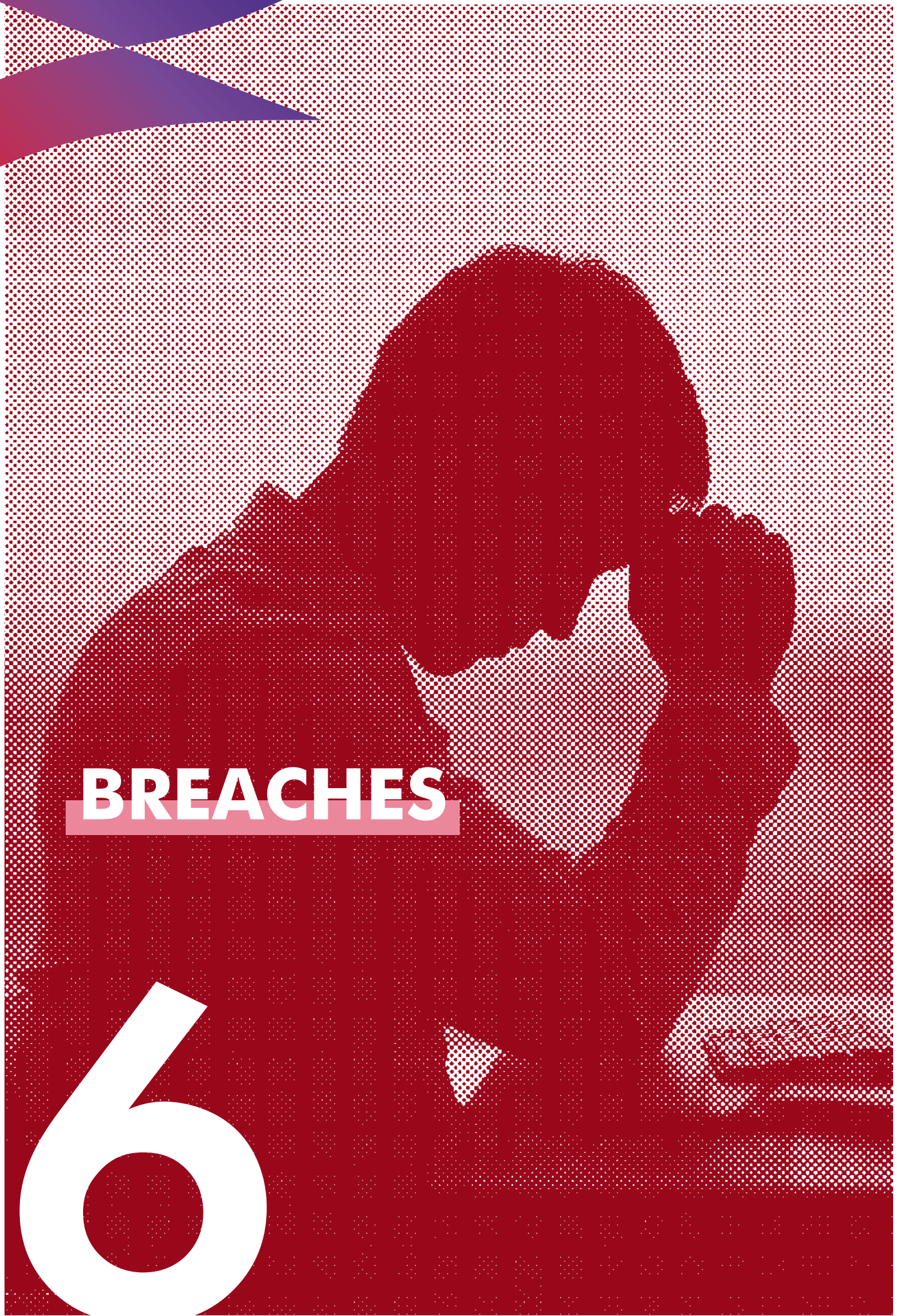
- Group Human Resources and CSR Director.
- Corporate Legal Officer.

Or by post, addressed to the same individuals.

If your report relates to one of the two above-mentioned individuals, you may **EXCEPTIONALLY** send it to your representative member on the Exec. Comm.

We would invite you to consult the document "Internal whistleblowing submission and processing procedure within **AIRVANCE** Group", for a detailed look at our whistleblowing procedure.





# BREACHES

6





## Breaches

The commitments that we take in this code are applicable to all our employees, and extend to our external stakeholders.

Breaches of these commitments may give rise to sanctions:

- **Internally:** For an employee, the application of disciplinary measures against them may be decided according to the severity of the actions and by application of the internal regulations of the legal entity concerned.
- **For external stakeholders.** Besides the option of automatic termination of contract with immediate effect, the sanctions may also take the form of compensation measures for the harmful consequences caused to the Airvance Group subsidiary concerned.



# 7

## APPENDIX

## **Appendix: Conduct during professional meetings**

**Conduct to adhere to in terms of competition law & anti-corruption rules, for any professional partnership meeting.**

### **Fight against corruption:**

When I take part in a professional partnership meeting:

- I agree to reject any attempt at corruption and/or bribery, in accordance with the provisions of the United Nations Convention Against Corruption (adopted by the United Nations General Assembly, by Resolution 58/4 of 31 October 2003, which was introduced into local law, whose legislation and regulations may apply to all or some countries, and whose anti-corruption provisions were specifically introduced to French law by the so-called "Sapin 2" Act),
- I declare that I have access to appropriate means to promote transparency, integrity and responsible leadership.

### **Competition law:**

Insofar as the companies attending the meetings, including Board meetings, have competing and sometimes opposing economic interests, I agree to participate in meetings held in strict accordance with competition (anti-trust) law. I shall ensure that the following precautions are applied:

- Each meeting must be preceded by a notification specifying the date and time of the meeting, and containing a copy of the meeting agenda.
- Minutes must be drawn up at the end of each meeting. These minutes must be clear, complete and accurate in terms of the discussion held, it must transcribe the measures taken, and the basis for these measures.
- No conversation must be held "informally".

*Continued on next page >*

## **Appendix: Conduct during professional meetings**

Generally speaking, I agree to avoid any communication and discussion that could directly influence the decisions of an individual company relating to production levels, product pricing, marketing strategies or selection of customers or suppliers.

### **Furthermore, I agree not to address the following subjects:**

- Price or any price info or price policy, including costs, discounts, reductions, profit margins, etc.
- Sales conditions, including warranties, credit and means of shipment.
- Particular competitors, suppliers or customers.
- Sales or production quotas or limits, breakdown of customers or sales territories, or the refusal to sell to certain customers or purchase from certain suppliers.
- The market share or sales territory of a particular competitor.
- The operating statistics, inventories, sales, marketing methods or the strategies of any particular customer.
- Competition oversight or the exclusion of a competitor on any market.

**I expressly declare that I have understood the instructions described above, and agree to apply them whenever this proves necessary.**

**Company:**

**Surname/Forename:**

**Date:**

**Signature:**





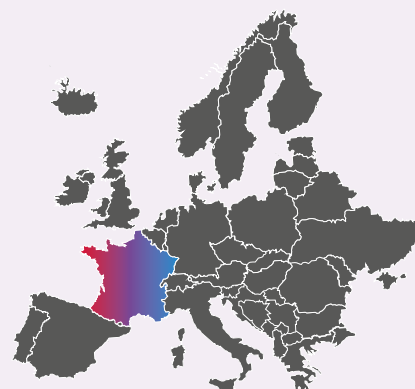
# COUNTRY DETAILS

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The amounts indicated in this part are the thresholds at which you can make or accept an expense, with a third party from outside the Group, without an exemption from your line manager.

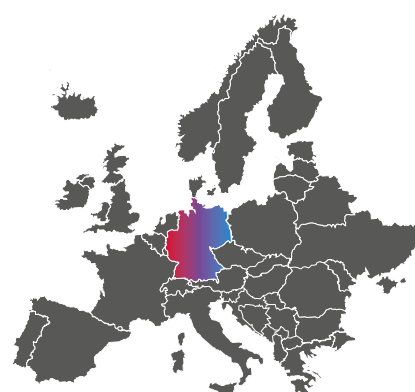
## Country details 1: France

	Given	Received	Top management
↪ Restaurant	€60	€60	€150
↪ Gift	€60	€60	€150
↪ Event	€50	€50	€150



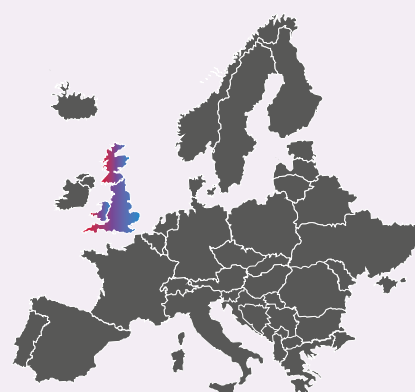
## Country details 2: Germany

	Given	Received	Top management
↪ Restaurant	€80	€80	€100
↪ Gift	€30	€30	€30
↪ Event	€30	€30	€30



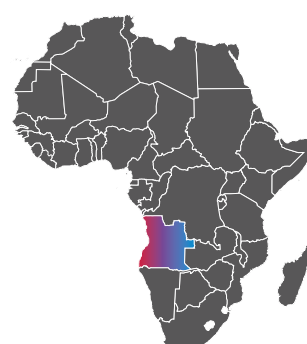
## Country details 3: UK

	Given	Received	Top management
↪ Restaurant	£50	£50	£120
↪ Gift	£30	£30	£120
↪ Event	£50	£50	£150



## Country details 4: Angola

	Given	Received	Top management
↪ Restaurant	€50	€50	€100
↪ Gift	€60	€60	€150
↪ Event	€60	€60	€150



## Country details 5: Austria

	Given	Received	Top management
Restaurant	€100	€100	€100
Gift	€50	€50	€50
Event	€100	€100	€250



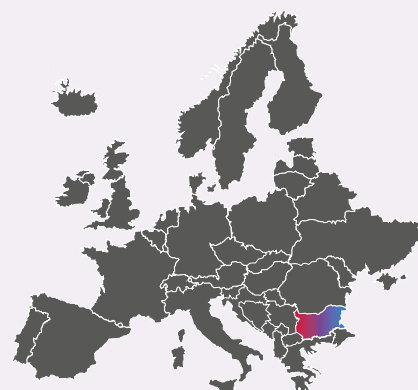
## Country details 6: Belgium

	Given	Received	Top management
Restaurant	€55	€55	€110
Gift	€55	€55	€110
Event	€55	€55	€110



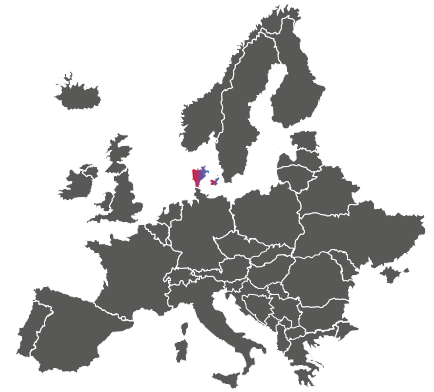
## Country details 7: Bulgaria

	Given	Received	Top management
Restaurant	Lunch €20-€30	Lunch €20-€30	Lunch €60
	Dinner €40-€60	Dinner €40-€60	Dinner €60
Gift	€50	€50	€60
Event	N/A	N/A	N/A



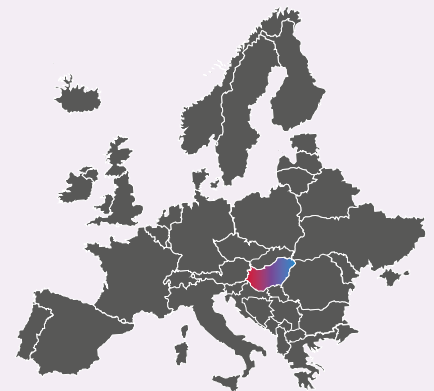
## Country details 8: Denmark

	Given	Received	Top management
Restaurant	500 DKK	500 DKK	2500 DKK
Gift	500 DKK	500 DKK	1200 DKK
Event	2500 DKK	2500 DKK	2500 DKK



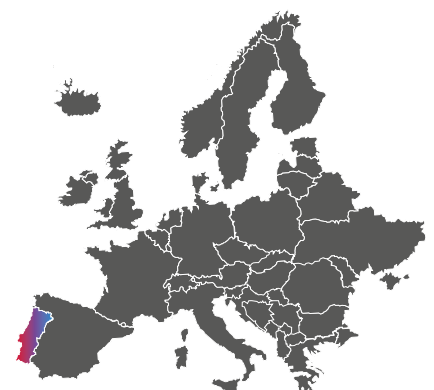
## Country details 9: Hungary

	Given	Received	Top management
Restaurant	20,000 HUF	25,000 HUF	25,000 HUF
Gift	10,000 HUF	10,000 HUF	50,000 HUF
Event	10,000 HUF	10,000 HUF	300,000 HUF



## Country details 10: Portugal

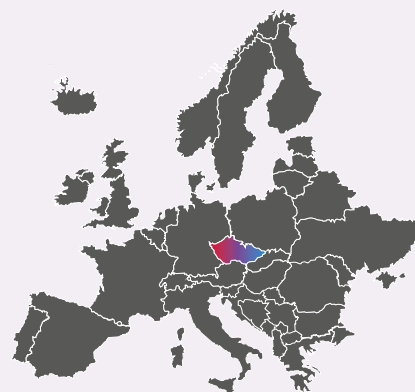
	Given	Received	Top management
Restaurant	€50	€50	€100
Gift	€60	€60	€150
Event	€60	€60	€150





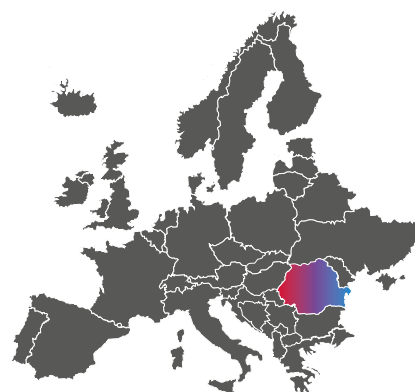
## Country details 11: Czechia

	Given	Received	Top management
↪ Restaurant	€25	€25	€50
↪ Gift	€25	€25	€50
↪ Event	€20	€20	€50



## Country details 12: Romania

	Given	Received	Top management
↪ Restaurant	€25	€25	€75
↪ Gift	€25	€25	€60
↪ Event	N/A	N/A	N/A



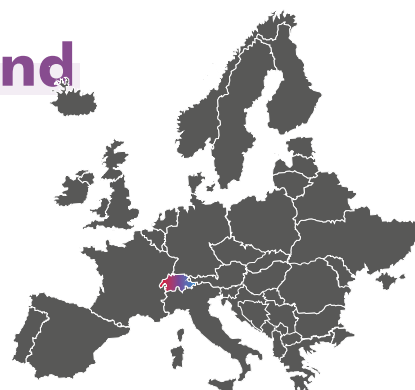
## Country details 13: Slovakia

	Given	Received	Top management
↪ Restaurant	€25	€25	€50
↪ Gift	€25	€25	€50
↪ Event	€20	€20	€50



## Country details 14: Switzerland

	Given	Received	Top management
↪ Restaurant	€60	€60	€120
↪ Gift	€60	€60	€120
↪ Event	€100	€100	€200





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