

## CODE OF CONDUCT IN THE FIGHT AGAINST CORRUPTION

### ALL CONCERNED, ALL VIGILANT

Trigano's General Management has always been committed to advocate and defend values of professional probity in all places where it runs its activities and to fight against all forms of corruption.

This code therefore applies to all personnel, including occasional collaborators. Any collaborator of the group, whatever his/her status and responsibilities, must know it, apply it and ensure its application throughout the performance of his/her professional activities. As such, it is an integral part of the group's entities' bylaws for those who have them and is brought to the knowledge of each and every collaborator by appropriate means.

#### Definition and examples

**Corruption** is a behavior by which a person acting while performing his/her function, solicits, proposes, demands or accepts offers, donations, gifts, advantages or promises directly or through an intermediary in order to accomplish, delay or refrain from committing an act pertaining directly or indirectly to his/her function in order to obtain or retain a commercial or financial advantage or to influence a decision.

The following shall be understood as acts of corruption and are therefore forbidden and will lead to the sanctions below:

- Bribes: undue money paid in exchange for an unjustified favor or service.
- Unjustified commission paid to intermediaries (without consideration or disproportionate)
- Gifts of any kind (travels, entertainment, invitations) given or received that exceed amounts defined by Trigano's General Management and whose importance could influence the independence of the professional relationship.
- Gifts to political parties or charitable organizations
- Facilitation payments to administrations (un-official payment in order to facilitate or accelerate formalities or decision makings)
- Patronages, sponsorships, mentorships or participations to events which aren't linked with the company's activities and which haven't been authorized by Management
- Conflicts of interest between a company employee and a third party in which that employee has a direct or indirect interest which has not been notified, known or authorized by the employer
- Influence peddling: the fact for a person vested with public authority to sell his/her actual or supposed quality or influence to influence a decision

- And more generally any payment, gratification, reward of any kind and whose hidden character is not appropriated, prohibited or contrary to the company's general interest.

## **Implementation**

The code of conduct is brought to the knowledge of all of the company's personnel.

Training sessions are organized according to each collaborator's degree of exposure to the risk of "corruption".

Each collaborator shall act in accordance with this code; should he/she harbor any doubts as to the expected conduct or to the code's interpretation, he/she shall refer to his/her supervisors, to human resource management or to Trigano's general management.

The company must always ensure that all the entities with whom it is lead to interact follow the same conduct requirements, before engaging work relations with them as well as regularly during the performance of the contracts. These third entities include customers, distributors, suppliers, subcontractors, providers and more generally all partners of the company, including public administrations.

The company has designed a procedure allowing its collaborators who have been made aware of a suspected or substantiated act of corruption to report this in a confidential manner.

## **Sanctions**

Substantiated corruption facts shall be sanctioned depending on their gravity or frequency by disciplinary sanctions as far as termination of employment contract pursuant to the Company bylaws or following similar conditions.

It is reminded that corruption also constitutes a crime and is sanctioned as such by the courts.

## **Revision**

This code of conduct shall be periodically revised and modified if necessary.