

Gifts and Entertainment Policy



1. Introduction

This Gifts and Entertainment Policy aligns with Atalian Servest Group's ("the Group") Code of Conduct and applies to all directors, officers, employees, agents, representatives, and other associated persons of the Group which may include consultants, contractors, advisors and temporary employees (collectively "Group Personnel").

It sets forth various rules relating to gift, entertainment, travel, meal and lodging received and/or offered by the Group Personnel.

Business gift and entertainment on a modest scale are commonly used to strengthen working relationships among business associates.

Providing or accepting occasional meal, small company memento and ticket to sporting and cultural events may be appropriate in certain circumstances.

However, if gift, entertainments or travels are offered or received frequently and/or have a substantial value, they may create the appearance of, or an actual, conflict of interest or illicit payment.

In order to limit this risk, the Group set up this policy and the annual Register of gifts and invitations to be completed by employees who have a decision-making role.

2. Gifts

As a general matter, the Group win tenders thanks to the skills of its staff and the quality of the services offered, not with gift or invitation.

A gift or invitation must not be offered or accepted with the intention of influencing another person to encourage him/her to abuse his/her position.

The use of Company funds or assets for offering gift, gratuity, or other favors to public or private persons that has the power to decide or influence the Group's commercial activities is prohibited, unless all the following conditions are met:

- a) the gift is not in cash or cash equivalent (e.g., gift cards, store cards, or gambling chips are prohibited);
- b) the gift is permitted under both local law and the internal procedures of the recipient's employer;
- c) the gift is presented openly with complete transparency;
- d) the gift is delivered directly to the recipient at his business address;
- e) the gift is properly recorded in the Register of gifts and invitations to be completed each year;

- f) the gift is provided as a token of esteem, courtesy, or in return for hospitality and should comport with local custom;
- g) the gift costs less than **100€**. This material threshold can be lowered depending on the economic environment of the country in which the Group operates.

Gift, gratuity, or other favors to private persons that do not fall specifically within this Policy require writing approval by the immediate supervisor who could contact the Compliance Officer if needed.

Gift offered to **public persons (elected officials, civil servants, employee of an international organization or State company, etc.)** require **advance consultation and approval by the Group Compliance Officer**, regardless of whether they comply with conditions (a)-(g) set forth above.

This Policy also applies if gifts and invitations are not paid by the Group but directly by the Group Personnel.

Group Personnel must not accept or permit any member of his or her immediate family to accept any gift, gratuity, or other favors from any customer, supplier, or any person seeking to do business with the Group.

Any gift that is not of low value as specified above should be returned immediately to the sender and the supervisor must be informed. If immediate return is not possible, they should be given to the Compliance Officer for charitable disposition.

No gift considered to be morally inappropriate or indecent can be accepted by a Group Employee or offered by a Group Employee to a third party.

The following gifts can **never** be accepted or offered:

- gifts of cash, or cash equivalent such as gift cards or gift certificates;
- gifts prohibited by local law;
- gifts offered or received for bribery purposes (e.g., to obtain or retain business, or to secure an improper advantage such as securing favorable tax treatment);
- gifts prohibited by the recipient's organization;
- gifts to family members of customers, suppliers or other business associates;
- gifts, gratuities or other items that benefit personally the Group Personnel, regardless of value.

3. Meal, entertainment and lodging

Common sense and moderation should prevail when meal and business entertainment are offered or reimbursed.

Meal, entertainment, travel, and lodging should never be offered as a means of influencing a business decision.

Only professional invitations offered or received as part of a business relationship, on an occasional basis, at a reasonable price and not for leisure purposes are authorized.

Expenses for meal, entertainment, travel, and lodging for public or private persons that has the power to decide or influence the Company's commercial activities may be incurred without prior approval by the Compliance Officer if and only if all the following conditions are met:

- a) The expenses are incurred for professional purposes;
- b) Meal, entertainment, travel, or lodging are permitted by the rules of the recipient's employer (if applicable).
- c) The invitation is sent to a professional address (e-mail or postal);
- d) The cost of the meal, entertainment, travel, or lodging is less than **100€** per person. This material threshold can be reduced depending on the economic environment of the country in which the Group operates.

Expenses for meal, entertainment, travel, or lodging offered to private persons that do not fall specifically within this Policy require writing approval by the immediate supervisor who could contact the Compliance Officer if needed.

Meal, entertainment, travel, or lodging offered to **public persons (elected officials, civil servants, employee of an international organization or State company, etc.)** require **advance consultation and approval by the Group Compliance Officer**, regardless of whether they comply with conditions (a)-(d) set forth above.

Daily "allowances" cannot be paid to a public or private person who has the power to decide or influence the Company's commercial activities for any reason.

Group Personnel must not accept or permit any member of his or her immediate family to accept any meal, entertainment, travel, or lodging from any customer, supplier, or any person seeking to do business with the Group.

When possible, meal, entertainment, travel, and lodging payments should be made directly by the Group to the provider of the service and should not be reimbursed to any Staff who have incurred the expense in advance.

The claim for reimbursement must be supported by the receipt indicating the total number of participants, their names and their employers and must be booked accurately and completely in the Group's accounts.

The following meal, entertainment and lodging can **never** be accepted or offered:

- “adult” entertainment or any sort of event involving nudity or lewd behavior;
- those prohibited by the recipient organization;
- those prohibited by local law;
- those offered to family members of customers, suppliers or other business associates;
- those that benefit personally the Group Personnel, regardless of value.

4. Annual Gift and Invitation Tracker for employees who have a decision-making role in the Group

The annual Gift and Invitation Tracker, enclosed as Appendix I, must be completed once a year by the employees who have a decision-making role in the Group. The tracker must include all gifts and entertainment offered and/or received by the Group Personnel during their professional activity and must be sent to the Compliance Department.

5. Alerts

Group Personnel are encouraged to raise concerns if they come across any activity or behavior which has taken place or which they suspect to take place in breach of this policy’s provisions.

For further information, the Code of Conduct and whistleblowing policy are available locally or on the intranet of the Groupe.

In case of any doubt please contact:

- the local Compliance Officer
- the Group Compliance Officer Margaux HALPERN at the following numbers +33 (0)1 55 53 05 06 or +33 (0)6 73 45 97 08; or to the email address: margaux.halpern@atalianworld.com
- or use the following email address alerte.compliance@atalianworld.com, administered by Margaux HALPERN (refer to the “Whistleblowing policy” for more details).

Note:

This ‘Gifts and Entertainment Policy’ may be revised or other policies or procedures may be implemented to ensure that the Company’s activities are conducted in an ethical environment and in compliance with the applicable laws and regulations. Details of the designated persons named in this policy might change, and additional contacts may be included at the discretion of the Group’s senior management. Any changes made in the policy, or any matter related thereto, would be intimated through proper channels.

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