

Policy Statement

This Policy applies to all Employees, Subsidiaries or Partners working for or with the Altrad Group and failing to comply to this policy and supporting policies, processes, procedures and guidelines in the management system may result in disciplinary actions, fines and even imprisonment.

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 which 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 Altrad Group is committed to fighting corruption in all the territories in which it operates, and to complying with the standards set out in the applicable laws, and particularly the Sapin II law, the Bribery Act 2010 and the Foreign Corrupt Practices Act (FCPA).

This Anti Bribery and -Corruption Policy defines the Altrad Group's anti-corruption values, which are in line with the Group's fundamental values. This policy details the responsibilities of all Altrad Group Employees and Partners in this fight. It also provides information and guidance on how to recognise and deal with corruption issues.

The prevention, detection and reporting of corruption are the responsibility of all those working for and under the control of the Altrad Group.

This Policy forms an integral part of the employment contract of Group Employees or the contractual conditions of Partners and comes into force on the date of its publication.

The Altrad Group Ethics Committee has overall responsibility for this Policy and the periodic review of its content and effectiveness. Group management at all levels is responsible for ensuring that its Employees and Partners understand and comply with this Policy and receive adequate and regular training on it. This also ensures the authority and independence of the anti-bribery compliance function.

The Altrad Group Chief Compliance Officer is responsible for implementing this Policy with the assistance of the Head of Compliance, the Compliance Department, Altrad Group management and Local Compliance Officers.

The Local Compliance Officer, Deputy Local Compliance Officer and the HSEQ Manager in cooperation with Management and Altrad Group furthermore commits to ensure continual improvement of the anti-bribery management system.

This policy is adopted for ISO37001 and Altrad Alpha Wind Service, but is based on the Altrad Group Policies:

- COM.BAC.POL.02.Antibribery&CorruptionPolicy
- COM.BAC.POL.01.BusinessIntegrityEthicsCode
- COM.BAC.POL.01.BusinessIntegrityEthicsFramework



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1 Definitions

In this Policy:

Advantage means a financial benefit such as money, gifts, loans, fees, an invitation, services, discounts, the award of a contract or anything else of value.

A Gift is an object given to someone that has the potential to cause a conflict of interest or to be considered as corruption (for example, a ticket to an event).

Bribery means offering, promising, giving or accepting an Advantage in order to induce the beneficiary or any other person to act improperly in the performance of his duties, or to reward him for having done so, or if the beneficiary acts improperly in accepting the Advantage.

Active bribery (Corruptor) means offering the Gift or Advantage of any kind to the person invested with the specific function.

Passive bribery (Corrupted) corresponds to the fact that the person invested with the specific function accepts the Gift or Advantage.

Employee means all employees, directors, officers, consultants, contractors, agents, representatives, trainees, casual workers, seconded workers and temporary workers working under the supervision of the Altrad Group.

Invitation refers to the act of inviting someone to an activity with a commercial purpose: going to a restaurant, attending a match or taking part in a tournament. Both the guest and the host will be present at the event.

Facilitation payments are monetary payments (also known as "baksheesh") that are generally small, unofficial and made to secure or expedite a routine or necessary action (e.g. by a Civil Servant).

Partner means any third party, person or organisation with whom Altrad Group Employees are in contact; this includes current or potential customers, suppliers, distributors, business contacts, agents, advisors and public and government bodies including their advisors, representatives, agents and politicians and political parties.

Civil Servant means any person holding a public/governmental office and any person providing a public service or performing a public function, including working for a public body or a company owned by the government/state. The definition also covers employees of private companies fulfilling publicly funded contracts.

Bribes means "kickbacks" and other payments made in return for a favour or business advantage.

Influence Peddling Is an offence in which a public official receives and Advantage from a natural or legal person in exchange for granting or promising the latter various advantages (decoration, market, employment, favourable arbitration, etc.)

2 The Altrad Group Values

Employees, Subsidiaries or Partners working for or with the Altrad Group are prohibited from soliciting an undue advantage or yielding to the solicitation of a third party with a view to obtaining an illegitimate advantage.

Employees, Subsidiaries or Partners working for or with the Altrad Group are prohibited from offering an undue advantage to a third party with a view to obtaining an illegitimate advantage.

2.1 Conviviality – Gifts and Hospitality

It is not acceptable, even if you do not benefit personally, to:

- giving, promising or offering any payment, gift or invitation in the expectation or hope that a commercial advantage will be received, or as a reward for a commercial advantage already obtained
- offer or accept a gift or accommodation during commercial negotiations or tendering processes, if these are intended or could be perceived as intended or likely to influence the outcome
- accept an offer of payment, gift or invitation from a third party that you know, or suspect is being offered in the hope that it will give them or anyone else a commercial advantage in return
- accepting an invitation from a third party that is unduly lavish or extravagant in the circumstances
- offering or agreeing to provide a personal service to a third-party natural person in exchange for a commercial advantage from the legal entity that he represents
- offer or accept a gift to or from government officials or representatives, political representatives or political parties, without the prior agreement of your Local Compliance Officer

2.2 Respect

In accordance with the Altrad Group's policies and values, it is strictly forbidden to:

- threaten or retaliate against another person who has refused to commit a bribery offence or who has raised concerns in accordance with this Policy
- participate in any other activity that may result in a breach of this Policy
- negotiate a personal kickback with a third party in exchange for a commercial advantage
- offer to sponsor an association or sponsor an event that is not intended to enhance the image of the Altrad Group or one of the Group's brands; if this is proposed with the aim of obtaining an undue advantage.
- lobbying, i.e. exerting pressure to obtain a favourable decision
- agreeing to hire someone in exchange for a commercial advantage.

2.3 Courage – Facilitation payment

It is not acceptable for an Altrad Group Employee or Partner, or anyone acting on their behalf, to make or accept Facilitation Payments, including, but not limited to, to or from Public Officials. It is recommended to avoid any activity that could lead to a Facilitation Payment or that could indicate that such a payment will be made or accepted. If payment is requested, it is important to pay attention to the purpose of the payment and that the amount requested is proportionate to the goods or services provided. A receipt detailing the reason for payment should always be requested. In the event of suspicions, concerns or questions regarding a payment, the Local Compliance Officer must be informed promptly. However, in accordance with the Altrad Group's commitment to making the safety of its Employees a priority, an Employee may not be held responsible for the payment of a facilitation on the grounds that his or her safety depended on it, provided that the Employee has declared the said payment to his or her line manager or to the LCO as soon as reasonably possible and that measures have been put in place to prevent the situation from recurring.

2.4 Solidarity – Donations – Sponsorship

The Altrad Group will only make philanthropic donations that are legal and ethical under local laws and practices. No Employee may make a philanthropic donation on behalf of the Altrad Group without the prior written consent of the Local Compliance Officer.

Please note that even legitimate donations can be interpreted as acts of corruption, particularly if they are made to charitable organisations likely to benefit a third party or if they are considered as an Advantage.

Sponsorship of an association or event must have a counterpart in terms of communication or marketing. Sponsorships help to strengthen the brand's image with specific target groups. Unlike donations, the aim is to obtain a specific benefit. Sponsorship activities take place in the fields of sport, arts and culture, science and education. Sponsorships can be interpreted as acts of corruption, particularly if they are made to organisations that are likely to benefit a third party or if they are considered to be an Advantage.

Sponsorships are accepted subject to compliance with the following rules:

- they must comply with all applicable laws and regulations
- they must not be incurred for the purpose of obtaining an undue advantage or unduly influencing a decision
- they must be recorded in the company's registers.

2.5 Humility - Partners

Relationships with Partners, in particular the use of intermediaries, may expose the Altrad Group to the risk of corruption. Policies and procedures have been defined by the Group Compliance Department and must be implemented by all in order to protect the Group from this risk.

The Group's management is committed to the fight against corruption as defined in the Integrity and Business Ethics Framework. Group management is also committed to implementing a management system that complies with the ISO 37001 standard



3 Potential warning signs

Although this list is not exhaustive, the examples below are warning signs that corruption may have been committed by an Employee or Partner of the Group. It is therefore advisable to inform the Local Compliance Officer or the Compliance Department as described below:

Reputation for paying bribes: You learn that an Employee/Partner has a reputation for paying bribes, demanding that bribes be paid or has a reputation for maintaining privileged relations with representatives of foreign governments.

Request for personal benefit: A Partner requests personal services that have no connection with the company that they manage or represent.

Request for "commissions": A Partner insists on receiving a commission or fee payment before committing to sign a contract or perform a service.

Payment in cash: An Employee or Partner requests a cash payment and/or refuses to sign a commission or fee agreement, or to provide an invoice or receipt for a payment made.

Non-standard payment methods: A Partner requests that payment be made in a country or geographical area other than that in which the third party resides or carries on business.

Request for additional payment: A Partner charges an unexpected fee (or commission) to "facilitate" or "accelerate" a service.

Gift or hospitality request: An Employee or Partner requests invitations or gifts before starting or continuing contractual negotiations or providing services.

Ignoring breaches of the law; A Partner requests that a payment be made to "ignore" potential breaches of the law.

Job applications: An Employee or Partner asks you to provide a job or other benefit to a friend or family member.

Non-standard invoices: You receive an invoice from a Partner who does not comply with the standards.

Use of back letters: An Employee or Partner insists on agreeing, either orally or in secret writing (letter, email, etc.), conditions that modify the apparent contract (e.g. modification of the price agreed in the contract) or refuses to put the agreed conditions in writing.

Excessive commission payments: You notice a commission or fee payment that seems high for the service you apparently provide.

Non-standard use of agents: An Employee or Partner requests or requires the use of an agent, intermediary, consultant, distributor or supplier who is not generally used by or known to the Altrad Group.

4 Communication

As an Employee of the Altrad Group you must commit to:

- keep financial records and comply with the Altrad Group's internal controls so that the Altrad Group has proof of the business reason for making payments to third parties
- declare and keep a written record of any invitation or gift offered or received, and comply with the procedures described in the Altrad Group Policy on Gifts and Hospitality
- ensure, where it is part of your role, that all invoices, accounts and other records relating to relationships with third parties, including suppliers and customers, are prepared with absolute accuracy and completeness. No 'off the book' accounting is permitted.

Where you have management responsibilities, you must ensure that training on this Policy is part of the induction process and that all Employees under your supervision (directly or indirectly) are periodically reminded of it.

You must communicate the Altrad Group's zero tolerance strategy on bribery and corruption to all Partners for whom you are responsible as soon as the Altrad Group begins to do business with them and regularly in the case of long-term relationships, as well as each time these terms are updated.

5 How to report a concern

You are encouraged to raise concerns about any problem or suspicion of corruption as soon as possible.

If you are offered or invited to make a bribe, or if you believe or suspect that bribery or any other breach of this Policy has occurred or may occur, you must inform your Local Compliance Officer, the Compliance Department compliance@altrad.com, file an alert on the GAN Platform <https://altrad.gan-compliance.com/> or call the Altrad Group Internal Whistleblowing Hotline as soon as possible.

The Altrad Group understands that potential whistleblowers are sometimes concerned about possible repercussions. We will support all Altrad Group Employees who raise genuine concerns under this Policy, even if they are mistaken, and will treat all concerns as confidential.

The Altrad Group is committed to protecting whistleblowers from any prejudicial treatment for raising concerns. Any Altrad Group Employee involved in retaliation against a whistleblower will be subject to disciplinary action.

Appendix A - Examples

Below is a list of examples of behaviour or acts, in connection with the Altrad Group's business, that may be interpreted as contrary to this Anti-Corruption Policy.

1. A site manager who offers to install scaffolding free of charge at a customer's home so that the customer can re-roof in exchange for a completion bonus.

NB - Providing a personal advantage, whether monetary or not, to our customer's representative in order to obtain a completion bonus that we would not normally have obtained is an act of active corruption.

2. A branch manager offered to repaint a customer's garden furniture at the same time as his company's painting work, as a "loyalty discount".

NB - Giving a personal advantage, whether monetary or not, to our customer's representative is an act of active corruption

3. The director of a company who asks an Altrad Group sales representative for free rugby tickets for himself and his family during a bidding period.

NB - Giving a personal advantage, whether monetary or not, to our customer's representative in order to obtain a contract that we would not normally have obtained is an act of active corruption

4. A sales manager decides to accept a mayor's request to finance a village's new football pitch in exchange for the award of a contract to supply scaffolding for the refurbishment of the school complex.

NB - Accepting a personal advantage in exchange for the award of a contract is punishable under criminal law; this is known as passive bribery.

5. A sales representative who accepts a "weekend chateau relay box" from a supplier in exchange for exclusivity.

NB - Accepting a personal advantage in exchange for a commercial favour is punishable under criminal law; this is known as passive bribery.

6. The agency assistant who calls her friend at the prefecture asking him to do whatever is necessary so that she can quickly obtain an authorisation for temporary occupation of the public domain to carry out the next scaffolding contract. She promised him a case of Champagne in exchange.

NB – Abusing one's position to obtain a favourable decision constitutes Influence Peddling and is punishable by law.

7. Offer a "tip" to a customs official to clear your container through customs more quickly.

NB – The offence of bribing a public official is committed as soon as the offer is made, even if the customs officer refuses it. The facilitation payment is an act of active bribery.