



GIFT POLICY

ACTIA



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In order to be exemplary in the fight against corruption, we must be vigilant when it comes to gifts and invitations. Gifts and invitations should never influence decisions.

Culture and etiquette vary depending on a country's customs. In any case, ACTIA abides by one set of rules: compliance with applicable law and regulations. If legal provisions in a given country are stricter than this policy, the laws in force locally should be respected.

For situations that are not described here, it is up to each individual to make the best decision using common sense and drawing on experience. You should not hesitate to consult your line manager, to avoid risks for yourself and for ACTIA.

1. Definitions and scope

- ❖ **Public Official:** refers to any official, representative or employee elected or appointed by a central or local government or authority, a government agency, a public international organization or a company owned, even partially, by a government (ministers, parliamentarians, elected representatives, agents, judges, civil servants including doctors of public hospitals, etc.), as well as politicians and candidates for public office.
- ❖ **ACTIA:** refers to ACTIA Group S.A. and all its direct or indirect subsidiaries.
- ❖ **Employee:** refers to all paid staff and corporate officers of ACTIA
- ❖ **Gift:** refers to any object of value, or any advantage such as a service, an invitation, a discount, offered or received, directly or indirectly.
- ❖ **Invitation:** refers to meals, trips, accommodation, cultural or sporting events, receptions, offered or received, directly or indirectly

This policy applies to any ACTIA Employee and any person acting on behalf of ACTIA, such as consultants, intermediaries, advisors, etc.

2. General Principles Concerning Gifts and Invitations

Gifts and invitations given or received must meet all of the following conditions:

- ❖ Comply with the applicable law and regulations,
- ❖ Entail no obligation, compensation or unfair advantage,
- ❖ Not generate a conflict of interest. In case of doubt, refer to the internal procedure for the management of conflicts of interest,
- ❖ Be occasional,
- ❖ Never consist of money or equivalent (cash, vouchers, loans, etc.),
- ❖ Be recorded by the Company (see part 6).

Public officials: Gifts or invitations to Public officials must be handled with special care and must always be validated in writing by the company CEO.

Tendering periods: Tendering periods require increased vigilance, so as to avoid any appearance of influencing the decisions.

- When ACTIA is in the process of answering a tender (e.g. from a customer), we should abstain from gifts and invitations to the representatives of the issuer of the tender.

- When ACTIA issues a tender, no gift or invitation should be accepted from potential applicants to the tender.

Specific situations / countries: In order to take into account local rules relating to Gifts and Invitations, ACTIA may implement procedures applicable only to certain subsidiaries, in addition to this general policy.

3. Offering Gifts

Gifts we offer to customers or other partners must be reasonable, of a limited amount, consistent with common practices and respect the following limits (VAT included):

- Without prior authorisation: ≤ €65
- Subject to prior authorisation from the CEO: > €65 but ≤ €250
- Prohibited: > €250.

4. Receiving Gifts

Only gifts of symbolic value may be accepted, such as calendars or ordinary pens.

In case we receive another type of gift, for instance from a supplier, we should:

- Explain ACTIA's policy not to accept gifts,
- Return the gift,
- If returning the gift is impractical or awkward, it should be shared or raffled among the company employees.

Gifts may not be directed to relatives or close friends.

5. Invitations

It is possible to accept and offer invitations of a professional nature:

- ❖ business meals, the amount of which is controlled (see expenses policy), i.e. in line with what an ACTIA employee is allowed to offer in return. Besides, it is advisable to reciprocate the invitations.
- ❖ invitations to an event, provided that it is in a professional setting and limited to just the event.

In any case, invitations must only be addressed to the contact within the company, and never involve family members or friends.

6. Records and Checks

Once a gift or invitation has been authorized, it shall be recorded as such by the Company in a register of gifts and invitations (e.g. kept by the company CEO secretary).

It is the responsibility of the Managers to enforce this policy within their teams. Regular audits will be conducted to this end.

7. Sanctions

Being influenced or seeking to influence someone through gifts or invitations is punishable by disciplinary or even criminal sanctions.

If in doubt: ask your line manager or ACTIA's legal officers for advice, or consult the Ethics Committee via e-mail: contact.integrity@actia.fr