



# ATALIAN Code of Conduct

**ATALIAN GLOBAL SERVICES**

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## A word from the Chairman



**Frédéric BAVEREZ**  
Executive Chairman of ATALIAN Group

*The Code of Conduct is a benchmark for all ATALIAN employees and stakeholders. Available on the company's websites and intranet, it sets out the Group's values, rules of conduct and action. These values are the foundation of our economic, social and environmental performance. It is essential for us to be exemplary*

*and above reproach in terms of compliance, as this is essential if we are to ensure the sustainable growth of our business, notably by providing guarantees to our customers and helping to attract and retain talent. In this sense, our integrity is clearly a competitiveness factor.*

*Over and above our convictions, I want to remind our employees that they are all, individually and collectively, the guardians of our reputation.*

*Through this Code of Conduct, we recall not only the fact that respect for our values implies strict compliance with the applicable laws and regulations, but also that we reject any kind of fraud or corruption. This document sets out our course of action, the international norms and standards that we apply, as well as the resulting commitments to our stakeholders. We set out the principles of professional ethics that must, in all circumstances and in all countries, inspire and guide our behaviour.*

*I ask all of our business and geographical divisions to widely disseminate our values and our imperative commitments to the teams in the form that they consider most effective to ensure compliance. I also invite all of our stakeholders to respect our values and to form with us a uniform circle of strict application of the rules on integrity.*

*I expect each of you to take ownership of this document so as to continue inspiring the trust of our public and private customers, our suppliers, our partners, our shareholders and our employees. If you become aware of a possible violation of this Code, it is your duty to report it on <https://en.ethicslineatalian.com>, in support of the highest level of integrity and ethics. You can also access this platform via Atalink / Compliance, as well as at [atalian.com](http://atalian.com) and [atalian.fr](http://atalian.fr). Have no doubt about the confidentiality of any reported information.*

*Thank you, and I'm counting on each and every one of you to make a commitment to act every day with integrity and in compliance with this Code.*

**Frédéric BAVEREZ**  


## A word from the General Secretary



**Driss AÏT YOUSSEF**  
ATALIAN Group General Secretary

*The ATALIAN Group has strengthened itself around strong values that guide our day-to-day actions. However well anchored these values may be, formalizing them is essential. This is the main mission of this document, which calls on all Group employees and stakeholders to apply and disseminate these values as widely as possible.*

*Collective mobilization is therefore imperative if we are to fully preserve our integrity in the exclusive interest of ATALIAN's future. This Code constitutes a minimum basis that must be applied to the furthest reaches of the Group, in other words within all entities. However, the entities can still complete it with more detailed and country-specific ethical rules or mechanisms. These adaptations must not, however, contradict or have lower requirements than this document. This Code*

*evolves regularly in order to take into account changes in the Group, new requirements in the conduct of our operations and the results of our risk mapping. Each executive will have his/her individual performance assessed on the basis of compliance with these rules.*

*We encourage all of our employees to live up to our commitments so that ATALIAN's reputation reflects our beliefs in probity. Integrity enables us to strengthen our reputation but also to create an element of economic differentiation.*

*We would like to emphasize the fact that the governing body will always be considered as a sponsor engaged in the fight against fraud and corruption.*

*In other words, all of our employees and stakeholders will find solid support in the application of our principles and values.*

**Driss Aït Youssef**



## Why a Code of Conduct?

Established in many countries, ATALIAN Group is one of the world leaders in Facility Management. ATALIAN Group supports companies and organisations in outsourcing services for buildings and occupants by providing personalized solutions that create value.

We operate within the most widely differing business sectors and environments with a global and integrated offer of services that align with the highest requirements.

The quality of our services has been the linchpin of our success in recent years and has enabled us to establish our reputation around the world. If it takes a lifetime to build a good reputation, it only takes a moment to destroy it. Corruption is a behaviour that seriously harms the economy, sustainable development and the efficiency of international and domestic trade by distorting competition to the detriment of consumers and businesses. It is for that reason that corruption is illegal in virtually every country in the world.

We operate in sometimes complex environments. In this context, our values are the foundations on which we want to build in order to achieve our collective ambition: to be a major player in Facility Management that places ethics and compliance at the heart of its strategy, projects and operations. Integrity is essential for ensuring the healthy and sustainable growth of our business and for creating a sustainable competitive advantage for ATALIAN Group.

This Code of Conduct demonstrates the desire of the ATALIAN Group, which has a zero tolerance anti-corruption policy, to prevent and detect any breach of probity and business ethics. Its aim is to help employees understand and apply the rules on ethics and compliance. It explains how corruption risks can be encountered during the Group's various activities. It also provides answers to questions that employees may have when faced with situations that could entail a risk of corruption.

This Code cannot exhaustively address all possible situations that may be encountered. Everyone will of course have to systematically refer to the Group rules as well as local specificities, or even ask the Group Compliance Department if necessary, and use common sense.

Should it prove difficult to interpret the rules of conduct of this Code, each employee is invited to refer to his/her line manager or the Group Compliance Department.

Each and every one of you is responsible for knowing the ATALIAN Group Code of Conduct, our internal policies and procedures, putting them into practice on a daily basis and being its ambassador to everyone working with and for us.

## What is the Code of Conduct?



The purpose of the Code of Conduct is to define and prevent possible breaches of our internal rules, business ethics or probity, such as acts of corruption or influence peddling. It illustrates the various types of prohibited behaviour and reminds the Group's employees and stakeholders of the rules to follow by presenting concrete cases and good practices to adopt.

This Code of Conduct is appended to the rules and regulations. It is not intended to replace locally and/or internationally applicable legislation, which must be applied in any event and known by all.

A secure and confidential whistleblowing system, accessible directly on <https://en.ethicslineatalian.com>, which can also be accessed via the platform indicated on Atalink/ Compliance, as well as on atalian.com and atalian.fr, makes it possible for any internal or external party to report, even anonymously, potential violations of the rules laid down by this Code of Conduct.

For whom is this Code intended?

This Code of Conduct applies to all, senior executives, employees (full-time and part-time), temporary staff, external stakeholders (suppliers, service providers, customers, etc.) throughout the Group's scope and for all of its subsidiaries, regardless of their geographical location or activity.

This Code of Conduct establishes a standard of behaviour that everyone must adopt as they carry out their professional obligations and in their relations with or for the ATALIAN Group.

## How to use this Code of Conduct?



This Code of Conduct is a reference framework that enables each employee and stakeholder to identify the Group's expectations.

To help them deal with situations that may lead to acts that violate probity, the following will be presented:

- ▶ Behaviour to be adopted in the case at hand;
- ▶ Necessary good reflexes or good practices;
- ▶ Reminder of the whistleblowing system.

This repository includes the following policies:

- ▶ Gifts and invitations;
- ▶ Patronage and sponsorship;
- ▶ Lobbying policy;
- ▶ Prevention and management of conflicts of interest;
- ▶ Policy for collecting and processing ethics alerts;
- ▶ Business provider policy;
- ▶ Third party due diligence.

→ The policies are available at <https://atalink.atalian.com/compliance/?lang=en>

These policies and this Code of Conduct may be subject to change in order to account for new risks possibly faced by ATALIAN Group.



## The fight against corruption

### What is corruption?

Corruption is a criminal offence that involves soliciting, offering, giving or accepting, directly or indirectly, an illicit commission, or a personal benefit or the promise of such a benefit in return for performing or failing to perform an action that falls within the scope of a person's function.

It can be public (if carried out by a public official, an elected official or a magistrate) or private.

In France, it is punishable by 5 to 10 years of imprisonment and a fine of 500,000 to 1 million euros.

The ATALIAN Group does not tolerate any form of corruption. It is prohibited by our rules and also totally illegal to offer, give or receive bribes, commissions or personal benefits, regardless of the recipients or beneficiaries, whether public or private, whether directly or through intermediaries.

Any employee who violates these rules will be subject to disciplinary sanctions.

Every legal or natural person acting on behalf of the ATALIAN Group must undertake to comply with anti-corruption laws and to apply this Code of Conduct or an equivalent standard.

Anti-corruption laws, whether French or international, are intended to apply regardless of where the ATALIAN Group may be established throughout the world.

### Corruption can also occur:

- ▶ Even if the personal benefit is given or received through a third party (an intermediary or business finder, a commercial agent, a subcontractor, a supplier, a partner, etc.);
- ▶ Even if the person receiving the personal benefit does not receive it directly (the actual beneficiary may be a family member, a third party, etc.);
- ▶ Even if the fraudulent action and the gift or personal benefit do not occur simultaneously (the benefit can be received before or later). Even if the proposal is not accepted by the third party or employee;
- ▶ Even when the personal benefit takes forms other than a sum of money (gifts or invitations, services rendered, hiring of relatives, etc.).

Preventing corruption and influence peddling is everyone's business: everyone, at their level of responsibility, can and must actively participate in the anti-corruption efforts by adopting ethical behaviour and using the dedicated alert line in the event of a breach of the Code of Conduct.



And in concrete terms within the ATALIAN Group?

Within the ATALIAN Group, corruption could occur in the following situations:

- ▶ In relations with suppliers, service providers or business finders in order to be selected in a call for tenders or to win a contract; to obtain more favourable contractual conditions; to invoice for fictitious services or overcharge for actual services; to change the beneficiary of the bank account into which payment must be made; to not detecting irregularities during due diligence, during a check by external auditors or to not sanction poor contractual performance;
- ▶ In relations with prospects or customers (notably "Key Account" customers) in order for the ATALIAN Group to win a contract or influence the contractual terms (volume, price, quality, etc.) of this contract or the conditions for obtaining this contract (missing certifications); to carry out free work or services at the home of prospects or customers; to secure the opening of a real estate site; to encourage the recruitment at ATALIAN of a close friend of the customer; to promote or maintain the inclusion of a customer in the list of "Key Account" customers;
- ▶ In relations with public administrations for obtaining authorisations, certifications or to ensure more favourable controls or in lobbying operations;
- ▶ By communicating confidential information, notably in connection with a merger and acquisition operation or in relations with business finders or other service providers for competitor-related information that they may have;
- ▶ By accepting a personal benefit for the resolution of a dispute or not sanctioning poor contractual performance or the commission of a crime such as theft;
- ▶ In the context of donation, patronage and sponsorship operations in relation to prospects or customers;
- ▶ By recruiting a person with whom the employee has personal ties or by agreeing to compromise without justification or necessity in order to terminate an employment contract.

**The offered or received personal benefit can take several forms:**

- ▶ A sum of money;
- ▶ Gifts or invitations (luxury items, travel, school fees for children, coverage of various expenses, invitations to prestigious sporting events, etc.);
- ▶ Promise of employment;
- ▶ Donations, patronage or sponsorship;
- ▶ Performance of free services (e.g. cleaning or maintenance services) or performance of work at no cost.

## Practical examples of corruption

1. An employee, through an expert, offers a gift to a public official in order to obtain or accelerate the obtaining of a work permit.
2. A member of the tax team offers to clean the country house of a tax inspector in order to obtain a favourable decision as part of the negotiation of an ongoing tax adjustment.
3. An employee offers a trip to his/her subsidiary's auditor in order to obtain a favourable report. The same would apply with this approach in an effort to obtain a certification, for example ISO.
4. An ATALIAN Group employee pays an excessive commission to a sales agent in order for the latter to pay a bribe to win a significant security contract.
5. An employee pays a sum of money through a fake sponsorship project to the foundation of a Key Accounts customer, in order to obtain better commercial terms for ATALIAN Group.
6. You are an Agency Manager and one of your service providers offers you free cleaning services in your second home in return for the renewal of its contract.
7. A supplier with whom you have been working for a long time offers to propose guidelines favourable to the supplier for the call for tenders that you must launch, in return for a trip for you and your family.

These seven situations can be considered as attempted corruption. They should be refused and the facts reported to your supervisor, the Group Compliance Department, or via the dedicated internal whistleblowing system.

This Code cannot exhaustively cover all of the situations that you may encounter. Its aim is nevertheless to enable you to identify, insofar as possible, the grey areas for which an informed decision is necessary.

When uncertain about what to do in certain situations, first ask yourself the following questions: Is it legal for me to be offered this, or for me to offer it? Does it comply with the ATALIAN Group rules and policies? Is the purpose legitimate? How would my colleagues, my hierarchy, my family, my friends react if they learned that I had accepted or given this personal benefit, gift or invitation? How would I react, or how would they, if this information were published in the press or on social media?

Do not hesitate to contact your hierarchy or the Group Compliance Department or to use the alert line to raise your questions or report any conduct contrary to this Code or the Group's values.

## Gifts & invitations

Everyone must remain vigilant in the context of gifts or invitations given or received and refer to the ATALIAN Group's Gifts and Invitations policy with regard to the authorised amount or the provisions for declaring these gifts or invitations.

Gifts or invitations must have a legitimate business purpose, be offered or given transparently, and their amount and frequency must be reasonable. A gift or invitation must not be given with the intention of influencing, nor may it violate the transparency and integrity requirements.

A gift is the delivery of a good or service of market value given to an individual in a personal capacity, whereas an invitation involves the presence of a Group employee with the guest at an event. Even if the event has professional content, invitations must follow the Gifts and Invitations policy (for example: potential presentation of ATALIAN Group products during a sporting event).

Gifts given or received as part of a business relationship as well as a reasonable and proportionate invitation (for example, promotional items, low-value end-of-year gifts or meals at a reasonable frequency) are acceptable and must be systematically declared. If the threshold set by the above-mentioned policy is exceeded, prior written approval is required.

Excessive invitations in terms of their amount (e.g. travel), frequency or in favour of the beneficiary's family are contrary to the provisions of this Code.



### PRACTICAL CASE

*While negotiating contractual terms, a chemical supplier proposes a trip for you and your wife. **Should you accept this proposal?***

**No.** Firstly, the amount of a trip exceeds the maximum allowable amount for an invitation. Secondly, this invitation extends to a member of your family. Finally, the time chosen for this gift is not appropriate in view of the sensitive moment in the commercial relationship.

The Gifts and Invitations policy prohibits this, since it amounts to attempted corruption.



### Do's and Don'ts

- ✓ Be familiar with ATALIAN Group's policies regarding gifts and hospitality, and comply with them;
- ✓ Recognise the elements at risk (how much? when? for whom?) ;
- ✓ Check with the Group Compliance Department in case of doubt;
- ✗ Promise or offer a gift to a public official or third party in order for this person to act within the scope of his/her duties;
- ✗ Accept the solicitation of a third party who offers you a gift (or vice versa) in exchange for a favour or decision affecting the business.

## Facilitation payment

A facilitation payment is defined as the small amount informally requested by a public authority to facilitate or accelerate a procedure, an operation, the processing of an application, etc.

Facilitation payments may be requested during interactions with public officials, such as customs, immigration or other services (e.g. tax department) in order to facilitate or expedite customs clearance, the granting of services, authorisations or administrative permits.

A facilitation payment is sometimes requested directly from a company employee.

Such payments may also be requested through third parties, for example service providers, business finders, etc. acting on the Group's behalf.

Any facilitation payment, however small it may be, is strictly prohibited.



### PRACTICAL CASE

*As a branch manager, you must urgently connect a customer's electrical cabinet on a job site, otherwise you may be late and this could prompt dissatisfaction from the customer. All documents have been released and are ready, but a final authorisation is missing. You wonder if a small gratuity to the public official in question would speed up the process. **Can you pay this small gratuity?***

**No.** This would be contrary to the our Code's rules that prohibit any facilitation payment, however small the amount. Integrity is the best gift that you can offer the customer.



### Do's and Don'ts

- ✓ Make sure to work with service providers with the best ethical standards when they act on behalf of the Group with public administrations;
- ✓ Remain vigilant and report any violations of the Group's internal policies;
- ✗ Accept or request a facilitation payment from a third party (e.g. a service provider);
- ✗ Agree to give funds to a public official without receipt or invoice.

## Influence peddling

What is influence peddling?

Influence peddling occurs when an intermediary (whether a public official or a private individual) offers, solicits or accepts any personal benefit whatsoever in exchange for abusing his/her actual or assumed influence over a public official so as to obtain a favourable decision or situation.

Each employee, in his/her dealings with public officials, may be exposed to a risk of influence peddling.

This is a three-person scheme in which the personal benefit is given to an intermediary in return for applying actual or assumed influence over a third-party decision-maker for the granting of an administrative act or decision, whether this influence actually exists.

Preventing corruption and influence peddling is everyone's business: everyone, at their level of responsibility, can and must actively participate in the anti-corruption and anti-fraud efforts by using the ethics alert line in the event of a breach of the Code of Conduct.



### PRACTICAL CASE

*An employee offers a gift to a local politician for this person to use his/her position to influence the technical service of his/her region's administration so that it will choose ATALIAN Group as a service provider.*

***The criminal offence of influence peddling exists even if the influence exercised does not make it possible to obtain the outcome expected from the gift/benefit. It is punishable by imprisonment for five years and a fine of €500,000 if the intermediary is a private agent, while these sums are doubled when the intermediary is a public agent.***

## Patronage & sponsorship

What is meant by patronage and sponsorship?

Patronage is material support provided, without direct compensation from the beneficiary to an undertaking or a person in the performance of activities of general interest. It is subject to a specific tax framework.

Sponsorship is financial or material assistance provided to an event, entity or individual in exchange for different forms of publicity related to that event, entity or individual.

Patronage and sponsorship activities carried out on behalf of the ATALIAN Group are only allowed if they are not prohibited by the applicable legislation of the country in question, and if they respect the Group's strict religious, political and philosophical neutrality.

They are governed by the ATALIAN Group's Donations, Patronage & Sponsorship policy and require prior validation in accordance with this policy before any commitment.

Any association or organisation targeted for such an operation must be subject to due diligence so as to ensure its legal existence and the absence of any possible conflict of interest between the members of this association or organisation and the ATALIAN Group, notably with regard to its locations and activities.

Any disbursement of funds must be monitored to ensure the substance of the project for which funds have been requested.



### PRACTICAL CASE

*A customer suggests that you make a donation to a charity in which he/she is a stakeholder, in return for his/her action to promote ATALIAN Group's activities within his/her market.*

**Can you accept this proposal?**

**No.** Given its similarity to attempted corruption, it is forbidden to accept this proposal. It is also contrary to ATALIAN Group's Donations, Patronage and Sponsorship policy since it does not adhere to the selection process for projects supported by the Group.



### Do's and Don'ts

- ✓ Be familiar with and apply the ATALIAN Sponsorship & Patronage policy;
- ✓ Verify the legitimacy of any supported associations or organisations;
- ✓ Remain vigilant and report any violations of internal policies to the Group Compliance Department;
- ✗ Make a donation to a third party offering you (or vice versa) a personal benefit in exchange for a favour or decision affecting the company;
- ✗ Engage in sponsorship or any operation (donation, patronage) without the prior validation anticipated by the selection process for projects receiving support from the Group.

## Conflict of interest

What is a conflict of interest?

A conflict of interest is any situation in which an employee's personal interests may conflict with those of the ATALIAN Group, thereby creating the risk of a questionable decision.

Conflict of interest refers to a potential or proven conflict between the personal interest of an employee (or of members of his/her family or friends) and those of the ATALIAN Group.

If they hold interests or participations in suppliers, customers, competitors or service providers, or have personal ties with one of them, the employees in question must inform their superiors of this conflict of interest. They will determine the most appropriate measures to avoid any risk of a questionable decision by this employee due to the existence of these personal ties.

Not declaring a conflict of interest is the reprehensible act, not the conflict itself.

A potential conflict of interest must be declared so that, if it ever arises, the good faith of the employee in question cannot be tarnished by any doubt as to the reasons why he/she did not originally declare the potential conflict of interest at the outset.



### PRACTICAL CASE

*In connection with the selection of temp work agencies prior to a call for tenders, you realise that a company run by your brother-in-law is on the shortlist of this pre-selection, in which you did not participate. **What should you do?***

This conflict of interest should be promptly reported to your superiors, and you should distance yourself from the supplier selection process for this call for tenders. Your line management must ensure that you do not have access to any tender-related confidential information.



#### Do's and Don'ts

- ✓ Know how to recognise a conflict of interest;
- ✓ Keep your superiors informed of any conflict of interest, even potential: at the slightest doubt, act transparently with your superiors;
- ✓ Remember to declare a possible conflict of interest in the annual declaration;
- ✗ Underestimate the consequences of a potential conflict of interest.



## Lobbying

### What is Lobbying or interest representation?

Lobbying or Interest representation may be defined as an effort to exert influence with political authorities in order to defend one's economic interests.

Any interest representation activity, sometimes called lobbying, must be carried out in compliance with this Code and the applicable policy. When it is carried out by a third party, it must be duly validated by the ATALIAN Group General Secretary before being initiated and due diligence must be carried out on this third party in accordance with the applicable policy.

This activity must comply with several points:

- All legal and regulatory obligations in the country where the activities are taking place. Indeed, some countries prohibit the use of lobbyists. In this case, you should contact the Group Legal Department to check the local position and comply with it;
- If the action is carried out by a third party, it must be strictly monitored. This third party must notably undertake to comply with the ATALIAN Group's Code of Conduct and ethical rules intended to combat corruption and influence peddling;
- All lobbying activities undertaken in France must be registered in the Registre de la Haute Autorité pour la Transparence de la Vie Publique (French Transparency Authorities), in accordance with French law.

During this activity, it is forbidden to:

- Offer any hospitality (gifts, invitations) to a public official in order to obtain a favourable vote or decision;
- Pay a public official to participate as a speaker in an event;
- Attempt to obtain confidential information by fraudulent means.



### PRACTICAL CASE

*A public relations firm working for ATALIAN contacts a parliamentarian, rapporteur of a law on cleaning services for companies, and offers a personal benefit (for example a free cleaning service at home) to this person in order to make known the professions related to maintenance, all in return for his/her favourable vote during the discussions on the project. **Is this allowed?***

No. The rules of this Code of Conduct totally prohibit this. Moreover, this initiative is similar to an attempt at public corruption of a person holding elected office.



### Do's and Don'ts

- ✓ Know ATALIAN's lobbying policies and follow them;
- ✓ Make sure that you are working with trusted partners and that you have completed third-party assessments before using lobbying firms;
- ✓ Remain vigilant and report any violations of internal policies to the Group Compliance Department.
- ✗ Interest representatives must not be used to circumvent Group rules.

## The whistleblowing system

The ATALIAN Group has set up an external platform for collecting ethical alerts, accessible by all, internally and outside the Group, at <https://en.ethicslineatalian.com>, which you can also access via Atalink/ Compliance, as well as on atalian.com and atalian.fr. This platform can also be used to ask questions or share your questions about certain situations of possible breaches of ethics and of this Code.

The confidentiality of the whistleblower's identity, of the facts mentioned in the alert, as well as of the implicated persons, is preserved at all times during the procedure for collecting and processing alerts.

Alerts can be launched anonymously.

The whistleblower acting in good faith has a specific status that protects him/her from any retaliation resulting from the alert and in connection with the reported facts.

These alerts will be processed in accordance with the procedure for collecting and processing ethics alerts, available on Atalink/ Compliance, as well as on atalian.com and atalian.fr.