

Patronage & Sponsorship Policy

ATALIAN GLOBAL SERVICES

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INTRODUCTION

For nearly 80 years, the ATALIAN Group (hereinafter the "Group") has been contributing to the support of companies and organisations in outsourcing services for buildings and occupants by providing personalized solutions that create value.

We operate in tens of thousands of work, living and leisure spaces. We maintain and secure them, we make them healthier, warmer and more functional so as to provide a unique experience for their occupants and users, while ensuring their value as an asset.

Our mission enables organisations to focus on their core business and improve their performance. Taking care of people and their environment is our *raison d'être*.

In order for our approach to be firmly anchored in commitments that correspond to us, ATALIAN Group supports sponsorship, donations and patronage actions as part of its strategy with the ambition of promoting its values and strengthening its image.

Sponsorship, donations and patronage activities carried out on behalf of ATALIAN Group are only possible if they are authorised by the applicable legislation of the country in question and if they do not contravene the strict religious, political and philosophical neutrality that the Group applies in the performance of its activities.

This Policy is intended to define the various donation, patronage and sponsorship activities carried out on behalf of ATALIAN Group.

It specifies the eligibility conditions for projects supported by the ATALIAN Group, presents the key steps of the process that must necessarily be followed, as well as the required controls.

1. Definitions

Sponsorship

It is "material support given to an event, person, product or organisation with a view to deriving a direct benefit from it. Sponsorship operations are intended to promote the sponsor's image, and they include an indication of its name or brand" (Order of 6 January 1989 on economic and financial terminology).

Sponsorship must be justified by a legitimate and plausible business objective and be used specifically to implement the ATALIAN Group's communication and brand strategy. The consideration received in return by the ATALIAN Group must be precisely defined and proportionate to the granted sponsorship amount.

Patronage

It is defined as "material support provided, without direct compensation from the beneficiary to an undertaking or a person in the performance of activities of general interest."

It involves making a donation (in cash, in kind or in skills) to an organisation to support a work of general interest. If the beneficiary is eligible for tax-deductible patronage, the donation entitles donors (companies and individuals) to certain tax benefits.

Donations and patronage must be carried out as part of a volunteer activity. This volunteering consists of participation in the animation and operation of a charitable organisation without compensation or remuneration of any kind.

Patronage and Sponsorship Committee

This is the ATALIAN Group body responsible for studying and approving sponsorship and patronage requests. It meets once a month and decides on the sponsorship and patronage requests submitted to it.

It includes:

- The Chairman and Chief Executive Officer of the ATALIAN Group for requests over €30,000;
- The Group Secretary General;
- The EEC (Europe zone) and International Director;
- The Group General Counsel;
- The France Cleanliness Director;
- The Administrative and Financial Director of the country concerned by the request;
- The Group Communications Director;
- The Group Purchasing Director;
- The Group Compliance Director.

2. Request for patronage and sponsorship

The Policy for studying any patronage or sponsorship request includes the preparation of a file submitted to the Patronage and Sponsorship Committee, which approves or rejects the submitted request.

A file for the request must be compiled **via the completed patronage or sponsorship form available** from the Group Compliance Department or directly online on the Atalink portal <https://atalink.atalian.com/compliance/?lang=en> and include the following documents:

- Letter from the beneficiary organisation explaining the patronage or sponsorship project;

- Full copy of the original of the articles of association of the beneficiary organisation or equivalent depending on the country of registration of the beneficiary organisation, in order to assess the legal validity of its establishment;
- Copy of the last receipt of the declaration of articles of association to the Prefecture or equivalent depending on the country of registration of the beneficiary organisation, in order to assess the legal validity of its establishment;
- Copy of the publication of the articles of association in the Official Journal or equivalent depending on the country of registration of the beneficiary organisation, in order to assess the legal validity of its establishment;
- Banking information slip (RIB);
- Any other document that will help establish the context of the patronage and sponsorship project.

Only complete files will be presented to the Patronage and Sponsorship Committee, which meets once a month to decide.

Complete files must be submitted at least eight weeks prior to the event being considered for sponsorship/support. Some files may require discussions with the Group Compliance Department, the beneficiary and/or the applicant, which may result in a longer processing time.

Patronage or sponsorship actions to be renewed from one year to the next must also be validated by the Patronage and Sponsorship Committee, and therefore also require the preparation of the file presented above (with the indication that it is a renewal) with the supporting documents.

In order for the Group Compliance Department to validate the file before its presentation to the Patronage and Sponsorship Committee:

- It must be of a legitimate and plausible commercial nature and contribute to implementing the ATALIAN Group's brand communication strategy;
- The use of funds must be clear and transparent. The identity of the recipient and the intended use of the contribution must be clearly specified and documented;
- The contribution or donation must not be paid to a natural person nor to a natural person's bank account, but rather to a beneficiary organisation or to its bank account;
- It must not be intended for a political party or an association with a political purpose;
- It must not contribute to personal enrichment or consist of a personal benefit;
- The Group Compliance Department's due diligence on the beneficiary organisation and its beneficial owners must not reveal any insurmountable anomalies.

A sponsorship file cannot be established for the purchase of show tickets or private boxes for recreational or sporting events. These are gifts and invitations that must comply with the rules of the ATALIAN Group's Gifts and Invitations Policy.

3. Content of the due diligence

The due diligence on the beneficiary organisation and its beneficial owners is intended to ensure that neither the beneficiary organisation nor its beneficial owners are subject to past convictions or ongoing investigations for acts of breach of probity or international economic sanctions, to ensure their morality and reputation, to identify any potential conflict of interest or any politically exposed person.

If necessary, this due diligence may include an interview with representatives of the beneficiary organisation.

The results of completed searches are tracked and kept at the Group Compliance Department.

4. Approval or rejection of the request by the Patronage and Sponsorship Committee

Once the Group Compliance Department has validated the compilation of the complete file and the completed due diligence has not revealed any blocking points, the project leader or his/her manager is invited to defend the request at the monthly meeting of the Patronage and Sponsorship Committee.

The project leader is informed by e-mail of the validation or rejection of the request. The validation by the Patronage and Sponsorship Committee must be attached to the invoice.

The Group Compliance Department drafts a report on the meeting of the Patronage and Sponsorship Committee.

5. Patronage or sponsorship contract

Upon validation of the request, the project leader must complete the patronage or sponsorship contract, as relevant, which is sent to him/her by the Group Compliance Department or by the Legal Department. The contract must exactly reflect the elements presented and validated in the Patronage and Sponsorship Committee.

All of the obligations of each party must be described in a precise and detailed manner, with a clear explanation of the objective of the action and the financial terms of the donation or sponsoring action (precise amount, method of payment, purpose of payment, concrete proof of project execution, consideration, etc.).

The contract must without fail mention the expected media benefits in the case of sponsorship and define the proof of performance of the project supported by the ATALIAN Group that must be recovered.

Before signature, this contract must also be reviewed by the Group Legal Departments.

6. Monitoring and auditing

The project leader must obtain proof of the performance of the sponsored project (photos, publications, etc.) and send them to the Group Compliance Department for archiving.

In connection with patronage giving the right to a tax reduction, the donation's beneficiary must issue a tax receipt (Cerfa form n° 11580*03 available on the website of the Ministry of Finance) and send it to the project leader. The latter will forward it to the ATALIAN Group Tax Department and to the Group Compliance Department.

2nd and 3rd level controls will be regularly carried out in accordance with the corresponding control plans in order to verify compliance with this Policy as well as the exhaustive nature of the documents in the patronage or sponsorship application file.

7. Accounting record

In each country, patronage and sponsorship expenses must be recorded in specific bookkeeping accounts that provide for the traceability of transactions.

Any accounting of patronage or sponsorship expenses may only be made by the ATALIAN Group's accounting department if accompanied by the project validation e-mail from the Patronage and Sponsorship Committee. Payment can only be made after written confirmation by the Group Compliance Department of the approval of the patronage or sponsorship application by the Patronage and Sponsorship Committee.

8. Ethics 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.



PRACTICAL EXAMPLES

*My sponsorship is a last-minute opportunity, and I could not meet the submission deadline of 4 weeks before the event, **can I still submit it to the Compliance team?***

Yes – you can submit it, but if there are missing items or if it requires clarification, it is not guaranteed that it can be presented to the committee before the Compliance team has carried out all of the necessary checks on the third party.

*I want to have ATALIAN Group to sponsor a charity race in which colleagues and I will be competing, **do I have to go through the application process?***

Yes – since this is a sponsorship operation making use of our branding as well as company funds, it is mandatory to go through the process outlined in this Policy, even if you have already obtained local approval. This will ensure transparency and allow valid counterparties to be established.

*A customer / supplier asks me to sponsor one of its annual events by giving it a gift of our choice, **can I participate?***

No – Sponsorship operations can only involve grants, and they require a clearly established consideration. Gifts and invitations are managed under dedicated policies and cannot be applied in this specific case. You should discuss such requests with the third party and Compliance to find an adequate solution without putting yourself in a difficult situation with your supplier / customer.

*I'm the president of an association that wishes to organise a football tournament and I wish to have it sponsored by ATALIAN Group, **can I submit the project?***

Yes – However, this relationship will need to be declared by following the Conflict of Interests Policy. In addition, as part of the application, this relationship will have to be mentioned in order for this to be factored into the decisions. The request can then go through the classic approval circuit.

*I'm personally participating in a charity race, **can I have the race sponsored by ATALIAN Group or its suppliers / customers?***

No – Even if it is a personal event, it is forbidden to call on non-company third parties in order to sponsor events.

*Upon reading this Policy, I realise that we have carried out local sponsorship actions without ever having obtained permission other than that of my site manager. **What should I do?***

If such cases arise, we recommend that you contact the Compliance team without delay in order to take appropriate measures, even after the fact. Each situation will be reviewed on a case-by-case basis to determine the necessary actions.

*I'm in the process of renewing a call for tenders with a customer and I want to sponsor one of its events, **is this possible?***

Yes – But like all requests, this must be specified in the form and studied during the analysis.