

# Code of conduct



**BOLLORE**

# CONTENTS

## Forewords

2

Message from Cyrille Bolloré, Chairman and Chief Executive Officer of the Bolloré Group

4

Commitments, values and scope of the code

## Part 1

### Commitments and responsibilities

8

Corruption, anti-competitive practices and international sanctions

12

Human rights

17

Health and safety of individuals

21

Environment

23

Personal data protection and Security of information systems

25

Diversity

27

Company assets

## Part 2

### Implementation of the code of conduct

32

Apply

34

Get informed, alert

The code of conduct can be supplemented by application policies and procedures and other information or training materials (videos, etc.)

Additional resources can be accessed by scanning the document through the application

### Responsible and committed



Downloadable on stores



The Bolloré Group’s ethical approach relies on values and principles embodied and applied by all its directors and employees worldwide.

For all employees and partners of the Group, this code of conduct details the fundamentals of this approach and the behaviour expected in their daily operations.

This code of conduct is fully aligned with the Bolloré Group’s social and environmental responsibility policy, expressed in its Ethics and CSR Charter and in its “Responsible and Committed” annual report.

### Four fundamental pillars



**Acting**  
with integrity  
in our business conduct and  
promoting human rights



**Uniting**  
and protecting people,  
the company’s  
greatest strength



**Innovating**  
in response to major  
environmental challenges



**Committing**  
over the long-term  
to regional development

# Always act with integrity



Throughout its nearly two centuries of existence, the Bolloré Group has never ceased to develop by adapting to a constantly changing world. This success is owed to the commitment of the women and men who grew our activities while upholding our values and forging a business ethics shared by all.

The Bolloré Group condemns corruption, influence peddling and anti-competitive practices. It ensures financial transparency, compliance with international sanction programmes and the protection of personal data.

It prevents damages to the environment, violations of human rights and fundamental freedoms, and risks to the health and safety of individuals. Lastly, it fights against all forms of discrimination and harassment.

We live in an era of transparency and responsibility, in which declarations of intent do not suffice. Through our individual actions, we are all ambassadors of the Group and accountable for its reputation. The representatives of all our subsidiaries join me in asking you to always act with integrity, in compliance with applicable laws and our code of conduct. No circumstances can excuse behaviours contravening this code: it is our collective responsibility and the sustainability of our Group is at stake.

**Cyrille Bolloré**

Chairman and Chief Executive Officer  
of the Bolloré Group



3

The Bolloré Group operates in three main sectors: Transport and logistics, Communication and Electricity storage and systems. The Vivendi group has its own ethical approach covering its communication activities, applicable to its companies and adapted to their business lines.

➔ For more information: [www.vivendi.com](http://www.vivendi.com)



# A code of conduct...

## ... that confirms our commitments

The code of conduct details the commitments of the Bolloré Group regarding:

- the **fight** against corruption;
- the **fight** against anti-competitive practices;
- **compliance** with international sanctions;
- the **respect** of human rights;
- the **protection** of the health and safety of individuals;
- the **preservation** of the environment;
- the **protection** of personal data;
- the **fight** against discriminations;
- the **protection** of company assets and financial transparency.

## ... inspired by our values

The commitments expressed in the Ethics and CSR charter and the code of conduct are supported by the values of the Bolloré Group:



**Humility**



**Excellence**



**Courage**



**Solidarity**



**Agility  
& Innovation**

## **... in line with international standards**

The principles of the code of conduct are aligned with international ESG standards, such as the guiding principles of the UN, the OECD and the United Nations Global Compact, of which the Bolloré Group has been a signatory since 2003. As such, the Group is committed to integrate the ten principles of the Global Compact in the areas of human rights, labour standards, the environment and the fight against corruption into its strategy, culture and daily operations.



## **... and is binding upon everyone**

Because individual acts must not compromise collective commitment, each and every employee, agent and business partner of all Group companies is responsible for adhering to it. The Bolloré Group does not tolerate any breach of this code and encourages its stakeholders to report conducts that would contravene it (see the “Alert” section on p. 34). Perpetrators of misconducts are liable to disciplinary actions or legal proceedings in accordance with applicable laws.





**Part 1**

# **Commitments and responsibilities**

7



## Fight against corruption

### ➔ Key features of our policy

The Bolloré Group condemns all forms of corruption and influence peddling.

Corruption is one of the major obstacles to sustainable growth and economic and socio-political development for emerging and developed economies alike.

Anyone acting on behalf of the Group must refrain from offering any advantage whatsoever to any individual (including government officials) to perform or abstain from performing any of their official duties, or to exercise their influence in order to obtain an undue advantage to the benefit of a company of the Group.

### ➔ What action should be taken?

#### **SCENARIO no. #1: I would like to offer a gift to a business partner**

A good customer, with whom I have had an excellent relationship for many years, is nearing retirement. I would like to give her a present or invite her to a restaurant. However, I am hesitating, provided that the contract entrusted to us by her company will soon come to an end and that she has the power to influence its renewal.

#### **Conduct to observe**

On specific or cultural occasions, you can offer gifts or invite customers/prospects to events to maintain good business relations.

These gifts are subject to declaration, authorisation and registration requirements.

Gift-giving (or receiving) shall remain a reasonable and selfless gesture, which must not be interpreted as being intended to influence the recipient.

In this case, due to the imminent term of the contract, this gesture is not compliant with the Group's policy in this area.

### **SCENARIO no. #2: A public official offers to speed up a procedure in exchange for payment**

While an ongoing operation is progressing slowly or is blocked, a public official offers to speed it up or circumvent it in exchange for a cash payment. The amount requested does not correspond to an official tariff and no proof of payment will be provided.

#### **Conduct to observe**

Even if you are not the person who originates this solicitation, the acceptance of a "facilitation" payment is considered as an act of bribery.

When faced with this situation:

- refuse courteously within the limits of basic security rules;
- inform your contact that such payments are contravening the Group policy;
- report the situation to your line manager or using of the whistleblowing system.

9

#### **➔ For more information on the Bolloré Group's anti-corruption policy,**

in particular concerning gifts and invitations, facilitation payments, lobbying, patronage and sponsorship:

- refer to the dedicated space on your intranet and to the company social networks;
- contact [compliance@bolloré.com](mailto:compliance@bolloré.com).



## Fight against anti-competitive practices

### ➔ Key features of our policy

A fair competitive environment, driver of innovation, enables us to provide our customers with the best possible products and services. The Bolloré Group does not take part in practices aimed at distorting, hindering, eliminating or abusively restricting free competition. These practices include arrangements aiming at fixing prices, or dividing market shares and allocating the awards of tenders.

### ➔ What action should be taken?

#### **SCENARIO: Competitors want to discuss the distribution of an important contract**

My company is a member of a professional association that encompasses players from the sector. During a meeting I attended, a discussion began between competitors concerning a major ongoing public invitation to tender, suggesting that an agreement could be reached to allocate the different work packages.

#### **Conduct to observe**

Professional organisations can be useful for discussions on common issues: regulations, technical standards, product safety, defence of the interests of the profession, etc.

However, if subjects such as price fixing, allocation of market shares or current invitations to tender are discussed, it is important to leave the room immediately and to make sure your departure is recorded. Then, report the incident to your line manager or by using the whistleblowing system.

10

## Compliance with international sanctions

### ➔ Key features of our policy

The Bolloré Group complies with sanction programs, in particular those adopted by the United Nations Security Council, the European Union and the United States of America, involving restrictive measures against either a State, an individual or an organisation. Anyone acting on behalf of the Group must refrain from participating in operations that could contravene an embargo, sectoral sanctions or assets freeze.



### ➔ What action should be taken?

#### **SCENARIO: A customer order the export of its products, without giving me any information on what is concerned**

I am contacted by a company that wishes to export products to country X. The customer is reliable and renowned in its markets, but it tells me that the nature of the goods will be specified to me later. I do not know if this lack of information is a blocking factor.

#### **Conduct to observe**

Some sanction programs prohibit or require prior authorisation for operations involving specific countries or economic sectors. In case of doubt, it is therefore necessary to obtain as much information as possible concerning the goods, to consult the intranet space dedicated to international sanctions to check whether this country X is subject to specific sanctions, and to contact the compliance delegate of your perimeter, if necessary.

11



## Protection of freedom of expression and association

### → Key features of our policy

The Bolloré Group respects freedom of speech, association and collective representation, and is committed to ensuring open social dialogue under all circumstances. Any person acting on behalf of the Group must refrain from any form of pressure, exaction or behaviour aimed at altering or hindering the expression of employees.

### → What action should be taken?

#### **SCENARIO: My employees wish to express demands but there is no framework for social dialogue in the country**

I manage an entity in a country where the right to collective organisation of workers is not granted by law. Some of my employees have told me about demands they would like to discuss and are considering forming a trade union for this purpose.

#### **Conduct to observe**

The Bolloré Group is committed to facilitating employee expression and to guaranteeing non-discrimination against workers involved in representative structures. In accordance with local laws, employees shall be heard and their demands considered.



Contact the Group human resources department to put in place tools and procedures aiming at gathering requests from your employees, and thus ensuring open social dialogue in accordance with local legislation.

## **Fight against forced labour and human trafficking**

### **➔ Key features of our policy**

The Bolloré Group is firmly committed to fighting all forms of modern slavery and human trafficking. Any person acting on behalf of the Group must refrain from participating in or contributing, directly or indirectly, to situations of forced labour.

Forced labour means any work performed against one's will and under duress of any kind of threat - the use of violence or intimidation, the manipulation of debts, the withholding of wages or identity papers, the threat of denunciation to the immigration authorities, etc.

Human trafficking refers to the exploitation of individuals through forced labour, often involving the transportation of these individuals within a country or across borders.

13

### **➔ What action should be taken?**

#### **SCENARIO: On a subcontractor's premises, employees appear to be forced to work in unsafe conditions**

During a site visit to a Group subsidiary, I realised that workers hired by a subcontracting company are sleeping on site and operating without suitable equipment.

Some workers are accusing their company of blocking the payment of their wages, in order to force them to continue working under these dangerous conditions when they would actually like to resign.

#### **Conduct to observe**

If the facts are found to be true, you should urgently inform your line manager or CSR contact, or report it through the whistleblowing system. Additional verifications will be carried out with the subcontractor and corrective actions will be taken quickly if necessary.

# Fight against child labour

## ➔ Key features of our policy

In accordance with the provisions of the International labor organization (ILO), the Bolloré Group refrains from using child labour, both directly and indirectly. Beyond compliance with local legislation regarding the minimum age of employment, the Group prohibits the hiring of children under the age of 15 for any work, and the hiring of young people under the age of 18 for any type of work referred to as “dangerous”.

## ➔ What action should be taken?

### **SCENARIO: One of my subcontractors uses employees who seem very young**

In the country where the company in which I work is based, the employment of children under the age of 15 is not prohibited. During a visit a site operated by one of our subcontractors, I noticed that some of the employees appeared very young.

### **Conduct to observe**

If you witness child labour, or if you suspect child labour on the premises of one of our suppliers or subcontractors, report the situation to your line manager or CSR contact, or use the whistleblowing system.

In regions where legislation or practices give rise to a suspicion of risk, the recruitment and use of subcontracted workers must be subject to increased vigilance. Systematically check the identity documents of the workers you are going to employ, and request same from your business partners, reminding that failure to comply with this commitment would lead to termination of the partnership would be.





## Rights of local communities and neighbouring residents

### → Key features of our policy

In accordance with local regulations and international standards, as set out in the Ethics and CSR Charter and the Human Rights Charter, the Group is committed to respecting and promoting the rights of local communities and residents that may be impacted by the performance of its activities.

### → What action should be taken?

#### **SCENARIO no. #1: The inhabitants of the neighbouring municipality accuse my company of pollution**

My company is located closely to natural and agricultural areas on which local communities depend. Residents of the neighbouring village are complaining about plastic waste found on roadsides and in bodies of water and are accusing the company of being the cause.

#### **Conduct to observe**

You should first determine whether the reported pollution is the result of misconduct on the part of an employee or partner acting on behalf of the company, or of a failure to apply internal environmental management procedures.

If you witness or suspect disrespectful behaviour on the part of an employee or partner/subcontractor working on site (for example,

15



the dumping of waste), report the situation to your line manager or environmental officer where appropriate, or use the whistleblowing system.

In regions where solutions for the recovery, management and sorting of waste are poor and/or absent, appropriate solutions must be implemented to prevent, correct or compensate for the risks of pollution.

### **SCENARIO no. #2: My company is accused of being complicit in violence against local populations**

In the region where my company is located, a company is accused of violent behaviour towards local population. Since this company is one of our subcontractors, the local authorities accuse us of being complicit in this violence.

#### **Conduct to observe**

If you witness or suspect violent practices on the part of a supplier or subcontractor, immediately report the situation to your line manager or CSR contact, or use the whistleblowing system.

Dialogue with local communities shall be ensured and pursued, and the allegations investigated. If they are found to be true, corrective measures will have to be taken by the subcontracting company, failing which the business relationship will be terminated.





## Workers' protection

17

### ➔ Key features of our policy

The Bolloré Group is committed to ensuring a safe and healthy working environment, by providing a framework used to identify and minimise the risks associated with its activities and by deploying an effective social protection policy. Any person acting on behalf of the Group must refrain from any behaviour likely to endanger the life or health of employees, suppliers, subcontractors, customers, users and local communities.

### ➔ What action should be taken?

#### **SCENARIO no. #1: I witness behaviour that I believe puts a colleague in danger**

When working in a very noisy manufacturing area, my colleague does not systematically wear his earplugs, even though we are formally required to do so. I have politely pointed this out to him several times, but nothing has changed. I am afraid he will take it badly if I discuss this with our manager.

#### **Conduct to observe**

Safety of all employees is a priority for the Bolloré Group and everyone is responsible for contributing to it. It is important to alert your line manager of this situation, after having informed your colleague that he or she is obliging you to do so.

In general, make sure that you know, understand and apply the health and safety policies and procedures. If in doubt, do not hesitate to contact your QHSE or Human Resources managers.

### **SCENARIO no. #2: I have a business trip to a country considered sensitive**

For professional reasons, I have to travel to a country that is experiencing certain political and social tensions. Although the situation in the field seems calm, I am wondering about the best way to prepare for this trip, in order to be able to react in the best possible way should security problems arise locally.

#### **Conduct to observe**

Prior to your trip, make sure that your management, as well as local diplomatic authorities if necessary, are up-to-date with your personal information (copy of your passport, address of residence). Strictly comply with local regulations regarding entry into the territory (entry visa, possible customs declarations, etc.). On site, during discussions or on social networks, avoid making declarations that may be qualified as political or partisan. Systematically avoid demonstrations or other public order disturbances and keep a low profile on the fact you are employed by the Bolloré Group.

➔ **For any question relating to security, please contact the Group Department: [suretegroupe@bollore.com](mailto:suretegroupe@bollore.com)**



# Fight against psychological and sexual harassment

## ➔ Key features of our policy

The Bolloré Group is committed to combating all forms of psychological and sexual harassment. Psychological harassment refers to repeated acts having the purpose or effect of degrading working conditions and that are likely to undermine the rights and dignity of other people, to affect their physical and mental health or to compromise their professional development. Sexual harassment is the repeated use of words or behaviour with a sexual connotation that harm a person's dignity due to their degrading or humiliating nature, or that create an intimidating, hostile or offensive situation for the person in question.

## ➔ What action should be taken?

### **SCENARIO no. #1: My line manager insists on inviting me to dinner, but I do not want this**

My manager has repeatedly offered to invite me to dinner alone without any professional reason. I always decline, but he insists. I am afraid that if I ask him to stop, it will backfire on me and be prejudicial to my work.

#### **Conduct to observe**

The behaviour of the line manager is not appropriate. You should inform your Human Resources manager or use the whistleblowing system. Bolloré ensures the confidential processing of alerts and the protection of whistleblowers acting in good faith against any form of retaliation.

19

### **SCENARIO no. #2: I witness inappropriate and repeated remarks made to a colleague at work**

A member of staff often makes sexual or very inappropriate remarks to another colleague in public in a joking tone. The latter does not seem very comfortable with the situation, but without saying so. I do not see the situation changing. Do I have to intervene? Talk to someone about it?

#### **Conduct to observe**

If you witness an inappropriate remark in the workplace, you should first suggest the victim to tell the perpetrator that its remark is not acceptable. If the victim is uncomfortable with this idea, then suggest that he or she discusses it with his or her line manager or Human Resources manager. If he or she still does not dare to act and the situation persists, you should inform your line manager or your local Human Resources manager.



20

**SCENARIO no. #3: One of my coworkers on a project, has repeatedly been subject to demeaning personal remarks**

The project manager repeatedly reminds him how inefficient, poor and incompetent he was during a previous project. These remarks, which do not appear to be based on facts, are often made in front of the entire team. The result is a hostile environment for the project, and the colleague is becoming more and more withdrawn and silent. How should I react? Do I have to talk to someone about it?

**Conduct to observe**

The behaviour of the project manager is not appropriate. You should suggest the person who has been the victim of these actions that he/she should inform his or her line manager or Human Resources manager. If the person is uncomfortable doing this and the situation continues, you should inform your line manager or your local Human Resources manager.

# Preservation of the environment

## 👉 Key features of our policy

The Bolloré Group complies with all applicable laws governing protection of the environment and makes every efforts to preserve it.

Anyone acting on behalf of the Group must refrain from behaviour contrary to the commitments made. Prohibited behaviours include degradation or destruction, whether voluntary or involuntary, gradual or accidental, of natural environments (air, soil, surface or ground water), natural resources and ecosystems.

## 👉 What action should be taken?

### **SCENARIO no. #1: From time to time, one of my service providers uses practices that pollute the environment**

My employer signed a subcontracting contract with a company. During an informal exchange with one of its representatives, I observed that this company's employees sometimes use polluting products or equipment to carry out their work, in order to reduce costs. However, in its communication, this company claims that it applies and complies with strict environmental standards.

21



### Conduct to observe

If environmental commitments are part of the contract between you and a service provider, supplier or subcontractor, any failure on their part in this area may result in the termination of the contractual relationship. To the same extent as employees, service providers are bound to comply with the Bolloré Group's environmental commitments, as set out in particular in the Ethics and CSR Charter. If you observe a situation that is contrary to expected practices, report the situation to your manager, your CSR contact, and to the entity's environmental officer, where appropriate.

### SCENARIO no. #2: My company's waste management system is insufficient

My entity has set up a waste collection and sorting system, but it is under-used. It is too far away, not very visible and not easily accessible for some people and does not promote optimal waste treatment. It often seems less restrictive to me to use the standard bin.

### Conduct to observe

In accordance with its environmental commitments, the Bolloré Group encourages its subsidiaries to implement measures to limit waste production and promote recycling solutions as much as possible. If your entity has deployed a waste sorting system, you must comply with it and give your feedback so that measures can be put in place to improve the system.





# Protection of personal data

## ➔ Key features of our policy

While the digitalisation of activities is a source of opportunities, it nevertheless requires the implementation of measures to ensure the confidentiality and secure processing of the personal data used by companies. "Personal data" refers to any information relating to an identified or identifiable natural person.

The Bolloré Group is cautious to protect personal data entrusted to it. Wherever it operates, it endeavours to implement appropriate technical and organisational measures to process this data in compliance with applicable laws.

All Group employees are bound by a confidentiality obligation regarding the protection of personal data to which they have access as part of their duties.

## ➔ What action should be taken?

### **SCENARIO: I have mistakenly received an e-mail containing lists of personal data concerning colleagues**

Someone inadvertently sent me an e-mail with a file regarding business trips of employees containing their names, administrative information and passport or identity card numbers. Should I just close or delete the document and ignore what I have seen?

#### **Conduct to observe**

Disclosure of this information, even mistakenly, is considered as personal data breach and requires corrective measures. It may also have been received by persons other than you, who do not have permission or who do not require to have this information. Contact immediately your data protection officer for advice on how to proceed or, failing that, your line manager or legal department.

23



# Security of information systems

## ➔ Key features of our policy

The Bolloré Group provides its employees with IT equipment, means of communication and required information and data in order to carry out their tasks. Employees are responsible for using these resources in compliance with the enforced security policy, in order to limit the exposure of Group's information systems to cyber-attacks risk.

Cyber-attacks, which aim at illegally obtain sensitive company data or personal information in order to exploit or resell it, can have a significant impact on business: production disruption, significant unavailability, loss of turnover, etc.

## ➔ What action should be taken?

### **SCENARIO: I have received an e-mail asking me to provide bank details**

I have received an e-mail from the bank that manages my company's accounts, informing me they will provide me my new access code. In order to validate this new code, I must connect to a website and enter my login and password. How can I make sure of the legitimacy of this request?

### **Conduct to observe**

A bank will never ask you for your login and password. This is clearly a phishing attempt. If you receive an e-mail from institutions or people you are in contact with, asking you to provide confidential or personal information, always be careful. Check the spelling in the e-mail, the sender's e-mail domain, the urgency of the request, etc. It could be a malicious individual attempting to steal your credential details.

If you have mistakenly provided your credential details, you must inform your line manager and change your password immediately.

➔ **In case of doubt, we recommend that you send a copy of the e-mail as an attachment to [security.team@bollore.com](mailto:security.team@bollore.com).**



## Fight against discrimination

25

### ➔ Key features of our policy

The Bolloré Group is committed to provide equal opportunity in hiring, employment, personal and professional development and promotion. This commitment is based on an inclusive culture that enables everyone, whatever their particularities, to reveal their full potential.

Anyone acting on behalf of the Group must refrain from discriminatory statements and practices based on origin, gender, family status, pregnancy, physical appearance, surname, state of health, disability, sexual orientation, age, political opinions, trade union activities, membership of a particular ethnic group or religion. The Group is particularly committed to promoting diversity in the workplace, professional equality between men and women, and the professional integration of young people.

### ➔ What action should be taken?

#### **SCENARIO no. #1: I am interviewing a person with a disability for a position**

I am carrying out interviews for a sales representative position. One of the candidates, deserving consideration for the position due to his skills and experience, has a motor disability. However, I am hesitant to accept his application because I feel that our customers may not be comfortable with his disability.

### **Conduct to observe**

Declining an application based on the reaction (or the assumption of a possible reaction) of others to disability, ethnic origin, or any other consideration based on elements outside the workplace is a discriminatory practice. You must make your decision based only on objective elements, such as skills and professional experience, enabling to establish that a candidate is capable of carrying out the work concerned.

### **SCENARIO No. #2: An employee I wish to promote is pregnant**

One of my employees has been in her position for four years, and she performs very well. I think she has the experience and skills necessary to become a manager in my team, a position I need to create quickly. She expressed her interest and motivation concerning this position but also told me that she is expecting her second child.

### **Conduct to observe**

You must take your decision based solely on the employee's ability to take up the position.

If this capacity is proven, the creation of the position can be implemented with a short period of adaptation of the mission and organisation of your team.



# Prevention of conflicts of interest

## ➤ Key features of our policy

All employees must refrain from taking part in decisions concerning the Bolloré Group when a personal interest (family, financial, associative, political, etc.) is likely to significantly interfere with the independent and objective exercise of their functions and affect their ability to act in the interest of the Group.

## ➤ What action should be taken?

### **SCENARIO: A member of my family is recruited by a partner company**

I discover that a member of my family has just been hired as sales manager for a company with which I am in regular contact for consultancy services. What shall I do?

#### **Conduct to observe**

You should disclose this situation, which may conflict with the interests of the Group, and refrain from making any decisions until the authorised persons have completed their analysis. This declaration cannot justify discriminatory measures against you. However, if it is established that this conflict of interest has given rise to fraudulent or corrupt practices, you incur disciplinary measures and/or legal proceedings.

27



## Confidentiality and prevention of insider trading

### ➔ Key features of our policy

No information of a confidential nature concerning the Group's activities may be used, communicated or revealed without the express authorisation of the Group's senior management division. Furthermore, individuals having access to non-public information regarding a company listed on a stock exchange must refrain from using this information to trade on financial instruments from which they could derive a profit.

### ➔ What action should be taken?

#### **SCENARIO: While the acquisition of a company is in progress, I am contacted by the press**

I am participating in the process of acquiring a company in a fast-growing market. I am contacted on a social network by a journalist, who tells me that she has been informed by a source close to the operation and that she would like to have obtain my opinion.

#### **Conduct to observe**

You should not circulate information pertaining to the Group, in particular, but not exclusively, on social networks, without first checking with the Communication Department that it is not confidential.



## Fight against tax evasion

### ➔ Key features of our policy

The Group ensures respect of tax rules applicable to its activity, the transparency towards tax authorities, and that its tax policy is consistent with its CSR strategy. The Group refuses the location of profits in tax havens; locations in countries with privileged tax regimes are possible if they are economically justified, i.e. if their motivation is not primarily tax-related. Any person acting on behalf of the Group is required to refrain from any action aiming at exempting a Group entity from its tax obligations.

### ➔ What action should be taken?

#### **SCENARIO: I have the possibility of starting a business relationship with a company located in a tax haven**

A tender offer is launched with a French company of the Group by a company located in a country recognised as offering attractive tax conditions. Can I respond to this tender?

#### **Conduct to observe**

Generally speaking, the Group's tax department must be involved in responses to invitations to tender as far upstream as possible, a fortiori when a country referred to as "non-cooperative in tax matters" is involved (for example, the Bahamas, Oman, Panama, the British Virgin Islands, etc.). Non-cooperative countries and regions are designated as such by the French government because they do not meet the required criteria in terms of tax transparency, the elimination of preferential tax measures and the exchange of tax-related information. However, business relations with these countries are not prohibited when they are economically justified. Therefore, if financial flows are envisaged with those countries, it is compulsory to inform the Group's tax department immediately.

29







**Part 2**

# **Implementation of the code of conduct**

31

# Code of conduct enforcement system



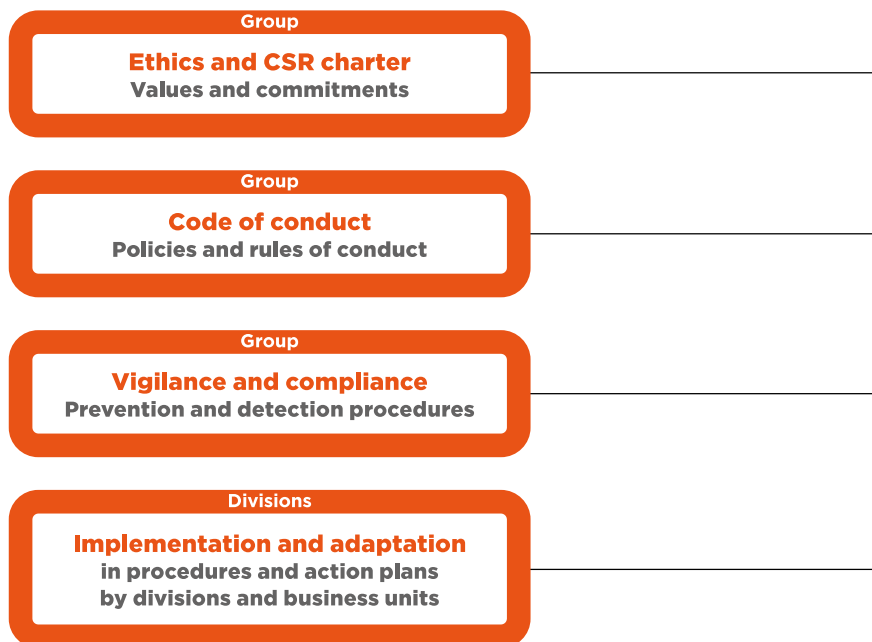
The Bolloré Group does not tolerate any breach of its code of conduct and undertakes to take all necessary measures to prevent and punish actions whose materiality will have been established following an adversarial procedure. Any person who contravenes the code is liable to disciplinary action under the conditions laid out in the rules of procedure or to legal proceedings in accordance with the applicable law.

Compliance with the Bolloré Group's commitments is relies on an effective and coherent system common to all divisions and monitored by a dedicated organisation made of:

- the Board of Directors;
- the General Management;
- the Ethics - CSR and anti-corruption Committee;
- the Group Compliance department;
- the CSR department;
- the human resources department;
- the Information Systems department;
- the Tax department;
- the Security department.

This organisation ensures that the code of conduct is properly understood and complied with. Their members are covered by an obligation of confidentiality and have the necessary competence, authority and means to carry out this mission.

## Functional organisation



**General public**

A **founding document** that sets out the Group's major commitments to sustainable and inclusive development.

**Employees, business partners**

A **founding document** stating the main principles, rules of conduct and behaviour to be adopted (health and safety, fight against corruption, compliance with competition rules, prevention of conflicts of interest, CSR, etc.).

**Operational divisions**

**Policies and procedures:** compliance, human resources (diversity, inclusion, etc.), QHSE, purchasing, personal data protection, etc.  
**Tools:** risk mapping, training/awareness raising, whistleblowing system, third party assessment (reporting and audit), dialogue with stakeholders, communication, etc.

**Local divisions**

**Procedures and action plans** applied by divisions, business units and subsidiaries, which ensure that policies are circulated in all regions where the Group operates.

## Get informed

The Bolloré Group implements an awareness raising and training plan aimed at ensuring that all its employees and business partners have a proper understanding of the code of conduct and will comply with it in the course of their daily activities. Employees identified as being exposed to specific risks receive additional training.

➔ **For more information on the code of conduct and policies:**

- Consult the displays and dedicated areas in your intranet;
- Contact the people in charge of its implementation within your scope;
- Contact the Compliance department: [compliance@bollore.com](mailto:compliance@bollore.com).

## Alert

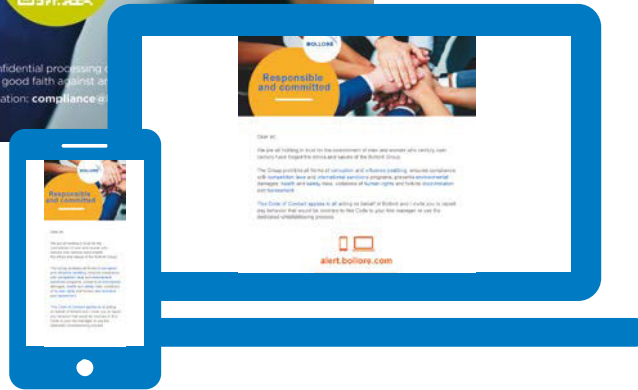
The whistleblowing system supplements “traditional” modes of reporting, such as the hierarchical channel. Accessible via Internet at [alert.bollore.com](http://alert.bollore.com), it enables you to report a potential breach of the code of conduct of which you are personally aware. The Group ensures a confidential processing of alerts and the protection of whistleblowers acting in good faith against any form of retaliation. However, individuals who make improper use of the system may face disciplinary action notwithstanding legal proceedings.





35

Display



E-mailing

Compliance department  
[compliance@bollore.com](mailto:compliance@bollore.com)

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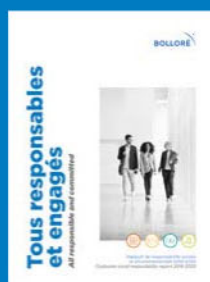
## Our ethics and CSR publications:



Code of conduct  
Charter system



"All responsible and  
committed" poster



"All responsible and  
committed" report



Compliance  
program



"All responsible and  
committed" brochure



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