

Anti-Corruption Policy

Altran Group

Last update

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ALTRAN

Our commitment

To the attention of all Altran employees

Ethics and integrity are fundamental elements of our principles of action with our suppliers and clients.

This commitment is not new. Indeed, in 2009, when Altran signed the UN Global Compact's 10 Principles, our Group confirmed its willingness to work in compliance with the highest ethical standards when conducting business while respecting human rights, international labor standards, environment and anti-corruption legislation. In addition, our Ethical charter emphasizes our engagement towards our partners, employees and the society in general.

At all times, wherever you operate, and no matter your position, you should always keep in mind that the service we provide is not just the result of our work, but also of how we achieve it. Ethics and integrity should be in your mind as much as excellence in work performance.

Corruption is today's key concern for our Group as it can jeopardize our activities worldwide. In this respect, we have decided to design this Policy to prevent this specific risk. Our objective is to provide a detailed framework of what is expected from each of us. It should serve as a reference for applying Altran's values in our day to day work.

Altran Executive Committee

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Introduction

What is the purpose of this Policy?

Working with integrity is one of Altran's core principles. The Group is committed to the highest ethical standards in performing business, in every location it operates.

This Policy is intended to provide you with rules and guidelines to ensure compliance with anti-corruption laws. It presents:

- Our commitment to apply those guidelines and rules; and
- Our desire to avoid any corrupt or otherwise unlawful operations when performing business.

This Policy is inspired by the principles described in our Charter of Ethics. It applies to all Altran employees: in France and abroad, working for or on behalf of Altran, including Third Parties.

It is the responsibility of each and every one of you to comply with the guidelines provided in this Anti-Corruption Policy in your day-to-day business.

This Policy should be used as a global framework for Altran Group operations worldwide alongside all local anti-corruption procedures and initiatives.

What is at stake?

Ethics is a key success factor in business for our Group. It is also an essential value to better serve our clients and to be recognized as a trusted and responsible Group. Furthermore, ethics contribute to a country's growth as well as to fair trade.

We conduct business in various countries and we have to deal with cultural differences while performing our activities. Although these differences may directly impact our way of conducting business, they can neither justify improper behaviors nor a breach of international or local laws.

This Policy provides guidance not only to help us choose the right business partners in the world, but also to adopt the right behavior in certain complex situations. These situations are presented in chapter 3 of this Policy.

This Policy aims at minimizing our exposure to corruption and protecting both Altran and its employees.

What is corruption?

Definitions

Wherever we conduct business, we are committed **to do our best effort to prevent corruption in all its forms**. As such, Altran is expecting its employees to not authorize, accept, receive, offer or solicit, directly or indirectly:

- Any payment,
- Any gift or anything of value,
- Any advantage,

with the objective of improperly influencing any act or decision to obtain or retain business or to secure any improper advantage.

Not only is corruption illegal, but it also goes against our values.

Both active and passive corruption is prohibited and we consider that authorizing, accepting, or receiving any payment / gift / anything of value / advantage ("passive corruption") is as much reprehensible as offering or soliciting it ("active corruption").

Whether corruption falls within the private sphere or the public sphere, it is prohibited. **Altran does not pay bribes to Government Officials**, private company executives or to anyone to obtain business or gain any improper advantages. Transactions or dealings with foreign officials or government officials are generally subject to stricter requirements.

Government Official refers to any officer or employee of any government, department or agency, any person acting in an official capacity for or on behalf of a government, a department or agency holding public authority or holding elective office or in charge of public service responsibilities. This includes political figures, domestic and international public servants, national and international judges, law enforcement, tax and customs authorities, among others. This prohibition against authorizing, accepting, receiving, offering, soliciting payment / gift / anything of value / advantage also applies to all Third Parties who provide services to the Altran Group or/and act on our behalf, such as suppliers, intermediaries, business developers, etc. It applies to a transaction of any kind.

What is corruption?

What are the main anti-corruption laws that apply to Altran?

Almost all countries have laws prohibiting corruption of their Government Officials, and many have laws criminalizing corruption of other countries' Government Officials, as well as laws that prohibit commercial bribery among private parties.

As a multinational organization doing business worldwide, Altran and its employees may be subject to local and international laws prohibiting corruption of Government Officials and private third parties included in the below regulations (but not limited to):

- French Anti-corruption Law also known as the Sapin II Law (updated in December 2016) (www.legifrance.gouv.fr);
- Foreign Corrupt Practices Act (FCPA) issued in the United States (www.justice.gov/criminal/fraud/fcpa);
- UK Bribery Act (www.justice.gov.uk/legislation/bribery);
- Italian Legislative Decree 231 (<http://www.camera.it/parlam/leggi/deleghe/01231dl.htm>).

and **international conventions** criminalizing bribery of Government Officials in business transactions:

- OECD Convention on Combating Bribery of Foreign Officials in International Business Transactions (<http://www.oecd.org/corruption/>);
- United Nations Convention Against Corruption (http://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf).

As an Altran employee, you should keep in mind that most anti-corruption laws have an extraterritorial reach. This means that, wherever a corruption case occurs, Altran and its employees could be charged under other countries' anti-corruption laws.

What could be the consequences of breaching anti-corruption laws?

In recent years, enforcement of anti-corruption laws has become more intensive and the penalties significantly more severe.

The adverse consequences for individuals and corporations who violate anti-corruption laws include **economic sanctions, debarment from contracting with public entities, seizure of bank accounts or damage claims**. In addition, employees may be sentenced to prison terms or suffer other financial penalties. In case of violation of any anti-corruption laws, not only will Altran be affected but also you as an employee if you participated in the corruption scheme.

Books and Accounting Records

In compliance with the anti-corruption laws, Altran must keep detailed and accurate books and records and a system of internal controls that ensure accountability for all shareholder assets. "Off-the-book" payments, fraudulent accounting practices or knowing falsification of books and records to cover up improper payments are prohibited.

No payments can be made based on false documentation. Every Altran employee has an obligation to report all transactions truthfully.



What are the risk areas?

Corruption may occur in various areas of our business.

We always consider sales and client acquisition as a risky situation. However, we must not limit our vigilance to such activities. Other kind of relationships might be risky such as our own procurements, our day-to-day operations and interactions with public authorities and more specially transactions such as developing new markets, acquiring new businesses, etc.

Corruption can take many forms, including the provision or acceptance of:

- Third Party relationships, including sub-contractors;
- Gifts, hospitality and entertainment;
- Travels and expenses;
- Facilitation payments;
- Charitable contributions and donations;
- Sponsorship activities;
- Political contributions.

Additionally, situations that may be symptomatic of corruption or be linked to corruption could relate to conflicts of interest.

Altran Group has developed these guidelines and recommendations for its employees **to support them in assessing situations and risks**, and ensuring that all operations and business activities will be **performed in compliance with anti-corruption laws**.

The present guidelines should also apply to all Third Parties who provide services and act on our behalf.



Third parties and intermediaries relationships

At Altran, we seek to establish and preserve relationships with the best qualified Third Parties, who share our ethical principles and help us maintain our business reputation.

Third Parties can be defined as intermediaries who act on our behalf (such as commercial agents), suppliers, customers, business finders, subcontractors, travel agents, tax advisers, law firms, external auditors, etc.

Under anti-corruption laws, Altran could be held liable for the unlawful behavior of Third Parties with who Altran is conducting business, as well as those acting on our behalf, even if we are not directly involved in the corruption scheme.

Accordingly, we expect all Third Parties with who we are working or who perform business on our behalf, as well as controlled joint ventures, to share our values and ethical standards as well as to comply with local and international laws and regulations, including those prohibiting corruption.

In order to mitigate this risk, Altran will enter into business relationships with Third Parties agreeing with:

- Identification and documentation of the needed information to be aware of this Third Party;
- Tender process;

- Analysis of Third Parties activities, background, financial data, reputational checks, etc;
- (Pre-)Selection of Third Parties based on objective criteria;
- Approval from your CEO and the VP Group General Counsel for certain types of services.

Under this Policy, a specific selection and monitoring process for intermediaries is expected. A due diligence questionnaire should be used in this respect.

In addition to the Third Party due diligence process (please refer to Third Party Due Diligence Questionnaire), operations performed by the Third Parties acting on behalf of Altran should be closely monitored.

Altran reserves the right:

- To request information from/about Third Parties;
- To apply a right to audit clause where they exist in the Third Party contract; and
- To withdraw from any agreement or other arrangement with any Third Party who is found to have acted contrary to international anti-corruption laws.

We must **keep financial records and have appropriate internal controls in place** which can be used as an evidence for making payments to Third Parties.

DO'S

- Document analysis / research made on Third Parties and archive all information provided by them.
- With respect to the Group commitment rules, obtain prior authorization from your CEO and validation of the contract by the VP Group General Counsel before entering into a new business relationship with an agent or a business finder.
Ensure that obligations to comply with anti-corruption laws are included in Third Parties contracts.
- Ensure that a termination clause is included in each contract which allows Altran to terminate the business relationship in case of non-compliance with international or local anti-corruption laws.
- Conduct due diligence in the event of allegations regarding a Third Party's reputation and justify if business contract is not to be terminated.

- Alert the local Top Management of any breach of anti-corruption laws that may have occurred as soon as you are aware of it.

DONT'S

- Don't conduct business with Third Parties suspected or known to be engaged in corruption or other unethical actions.



EXAMPLES OF RED FLAGS

- A Third Party refuses to certify compliance with the anti-corruption laws or to acknowledge Altran's Code of Ethics and Anti-Corruption Policy.
- A Third Party is carrying out its business in an industrial sector with a reputation for bribery or corruption.
- A Third Party has the opportunity to bribe on Altran's behalf.
- An invoice received for a commission or fee with an excessive amount given the provided service.
- Agents obtaining contracts unusually fast.
- An intermediary requests its payment to be made in a geographic location different from where it resides or conducts business.

Gifts, hospitality and entertainment

Exchanging gifts and invitations (hospitality and entertainment) may contribute to stronger business relationships. However, it can also bias our day-to-day business decisions. At Altran, we shall always offer/receive gifts and invitations in compliance with the following guidelines in a fully transparent manner, without it impacting our objectivity when conducting business.

Gifts, hospitality and entertainment include anything of value such as money, goods, loans, services, invitations to shows / exhibition / fairs etc. They express gratitude, friendship or the hope of future business success. In certain countries they may be compulsory.

Considering that it may sometimes be difficult to distinguish between an authentic gifts, hospitality and entertainment expense and an expense made with the objective to influence its beneficiary, Altran as well as its employees may be exposed to the risk of corruption.

Altran requires its employees to apply the following guidelines. Gifts, hospitality and entertainment may be accepted or offered if:

- They are clearly offered as a mark of client satisfaction;
- They do not create any obligation from

its beneficiary;

- They are not provided secretly and are documented where appropriate;
- They should not be negatively assessed by stakeholders if brought to their attention;
- They are occasional and have a symbolic value;
- They must be licit (respect local and international regulations and legislations);
- The value of the gift/hospitality and entertainment expenses should comply with the nature of the business relationship and local culture.

The appropriate recording of expenses in the Group's accounts is an important aspect of compliance with anti-corruption laws and regulations. As such, Altran expects its employees to have such expenses authorized in advance and provide all supporting documentation to justify offered gifts, hospitality and

entertainment expenses (including beneficiary name, reason for expense, amount) to their Accounting Department for them to be booked in the financial statements.

EXAMPLES OF RED FLAGS

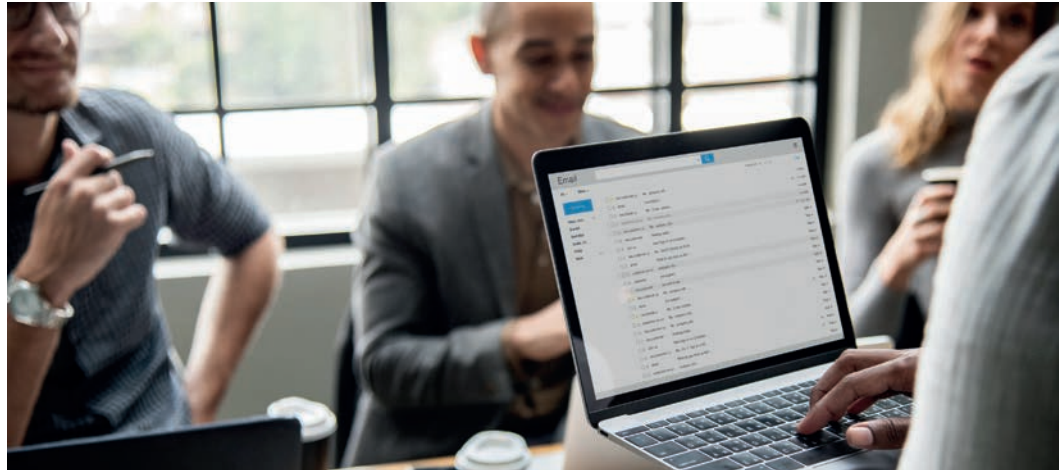
- **A Third Party demands lavish entertainment or gifts before commencing or continuing contractual negotiations for the provision of services.**
- **Unusually generous gifts or luxurious hospitalities are offered by a Third Party.**

DO'S

- Politely remind any Third Party with who Altran conducts business of our guidelines on accepting/offering gifts, hospitality or entertainment.
- Ensure that all gifts, hospitality or entertainment offered are appropriate and in line with Altran's Anti-Corruption Policy.
- Evaluate whether the offer / acceptance of any gift, hospitality or entertainment will raise an expectation on the part of the Third Party in terms of business activities with Altran.
- Ensure that you have prior authorization from your Line Manager before offering or promising any gift, hospitality or entertainment which may not be compliant with this Policy.
- Politely decline any gift, hospitality or entertainment that is not in line with this Policy.

DONT'S

- Don't solicit gifts or invitations.
- Don't give or accept cash under any circumstances.
- Don't accept or offer any gift, hospitality or entertainment while participating in a tender or competitive bidding process.
- Don't use gifts, hospitality and entertainment as rewards, inducements or encouragement for preferential treatment or inappropriate or dishonest conduct.



Travels and expenses

Although we guarantee the comfort and security of our employees wherever they go for business purposes, Altran shall not accept to be charged for personal, non-business related or unreasonable expenses. Travels and expenses are defined as costs incurred by the employees for business purposes. They are mostly composed of flight, accommodation, train, taxi, meal and car rental costs.

In order to ensure good performance and success of our business activities, we occasionally need to travel or to invite guests to our facilities / events or to take care of their accommodations and other expenses. However, certain travels and expenses made by an employee or refunded to a Third Party may not be in line with business purposes, or may not be compliant with anti-corruption laws.

Guidelines for Altran employees

Altran supports travels and expenses under the following situations:

- Travel requests are approved by your Line Manager in advance and comply with Altran Group Travel Policy;
- The travel or event is for legitimate business purposes such as for service presentation, training, etc;
- Every expense is justified by a receipt or an invoice. (Not only does this provide evidence that the trip was reasonable, but it also allows us to back-up the transaction

for accounting);

- The name of every invitee (internal or external) to business meals should be / must be indicated on the receipt. No travel expenses or living allowances for friends or family members are allowed or will be supported by Altran.

Guidelines for expenses made by/for Third Parties

The same guidelines should be applied for the expenses incurred for/ by Third Parties. In addition:

- Altran Management must approve any travel and expenses to be made by or on behalf of Third Parties before they are contracted;
- Expenses have to be reasonable given the surrounding circumstances of the trip and the seniority of the guest(s) / Third Parties.

Close relatives as well as family members of the Third Parties are not

entitled to travel at Altran's expense.

It is essential for Altran to conduct business in full transparency and that all travels and expenses are accurately and recorded in full in the books. Accordingly, all supporting documentation to justify travels and expenses must be provided by employees / Third Parties to the Accounting Department so that it can be booked in the financial statements.

EXAMPLES OF RED FLAGS

- **Travels and expenses receipts or invoices appear to have been altered.**
- **Incomplete or inaccurate documentation in relation to certain travels and other expenses.**

DO'S

For Altran's Employees:

Ensure that you have prior authorization from your Line Manager.

- Ensure that your expenses are in line with the Travel and Expenses Policy in use in Altran.
- Organize your trip together with our travel agency and/or preferred travel suppliers.
- Ensure that all original receipts/invoices are provided with your expense claim and expenses are properly recorded in Altran's financial records.
- Inform your Line Manager of any extension of business travel for personal reasons.

For Third Parties' expenses:

- Refund only the Third Party expenses which are supported by receipts/invoices.
- Ensure that you have prior authorization, if required, before offering or promising to reimburse Third Parties' expenses.

DONT'S

For Altran's Employees:

- Don't authorize your own expenses or the expenses of any collaborator with higher seniority than you unless you are given the delegation of authority.
- Don't submit expenses that do not mention the ultimate beneficiary of the travels and expenses to be refunded.
- Don't accept sponsored travel offers without prior authorization from your Line Manager.

For Third Parties' expenses:

- Don't transfer cash to an invitee for him / her to arrange his / her own travel.
- Don't accept to pay any travel and expenses (accommodation costs etc.) for a Government Official.





Facilitation payments

Facilitation payments to Government Officials are prohibited by most local and international anti-corruption laws. At Altran, we refuse to make any facilitation payments, unless one's life is in danger.

A "facilitation" or "facilitating" payment is **a moderate payment made to a Government Official** (as defined page 5) to speed up or secure a routine government procedure ,such as for:

- issuing visas, permits or licenses;
- gaining access to telephone, power or other utility services;
- obtaining police protection.

Facilitation payments are sometimes considered as **a means to corrupt Government Officials**. Accordingly, particular attention should be given to payments made to local Government Officials.

In some countries where Altran conducts business, it may be a usual / common business practice to make "facilitating payments". However, under certain local laws (such as the French Anti-Corruption

Law, Sapin II), facilitation payments are forbidden.

You must not pay, offer to pay or authorize facilitation payments unless your life is in danger.

EXAMPLES OF RED FLAGS

- The transaction between Altran and a Government Official relates to the purchase / acquisition of a "special" license or permit.
- A Third Party requests an unexpected additional fee or commission to "facilitate" a service.



DO'S

- Report immediately any situation where you had to make a facilitation payment. We remind you that such payments may only be made if and when your life is in danger.
- Obtain prior approval of Altran Top Management and/or Legal Department when you have a doubt with regards to the nature of the payment to be made to a Government Official.
- Establish contracts with Third Parties which include anti-corruption / anti-facilitation payment clauses.

DONT'S

- Don't make facilitation payments to influence someone in the conduct of his/her duties.
- Don't give a small amount of cash to a Government Official when a payment is required for the process you are dealing with.
- Don't agree to a contract with a Third Party which doesn't provide that expenses or payments to be made need be justified by a business reason and clear consideration.



Charitable contributions and donations



At Altran, we contribute to the development of the civil society: we support charity through contributions and donations. Charitable contributions and donations correspond to the transfer of goods, services, money or anything of value without any counterpart being expected.

Donations to charities, government agencies and any other government organizations present the risk that funds or something of value are being diverted for the personal use or benefit of a Government Official or private party.

Even if a Government Official or private party does not **receive a direct economic benefit**, a legitimate charitable contribution made in exchange for obtaining or retaining business or to secure an improper advantage could be construed as an unlawful payment under anti-corruption laws.

Charitable contributions or donations must be compliant with the following minimum standards:

- All contributions shall be made in accordance with the approved budget;
- Contributions shall be made only in favor of entities well-known, not recently

incorporated, reliable and with an outstanding reputation for honesty in all its operations;

- Local controlling activities must be implemented to set out an approval process for contributions and, to this aim shall provide for an adequate description of the nature and scope of the contribution, a due diligence review on the beneficiary entity and a check on the legitimacy of the contribution under the applicable laws;
- Payments to the beneficiary entity must be made exclusively on the account registered in its name. Payments in cash, to numbered accounts and with no mention of the beneficiary, to a party other than the beneficiary entity or to a country other than the beneficiary entity's country are not permitted.

Contributions must be properly and transparently recorded in the company's books and financial records;

- Original documentation indicating approval of the contribution in compliance with internal policy, processes and controls must be kept.

EXAMPLES OF RED FLAGS

- An association, a non-governmental-organization (NGO) or another organization has been debarred, blacklisted or known to be linked with terrorism.
- An association / NGO requests payment in cash.
- An association / NGO refuses to sign a formal agreement or to provide any receipt for the payment obtained.

DO'S

- Obtain appropriate approvals before making a donation on behalf of Altran.
- Only make donations to well known associations and organizations.
- Make sure the donation is in line with this policy.
- Obtain supporting documentation (such as a letter from the beneficiary confirming the donation amount, a payment receipt, etc.) for the donation which specifies the nature of the donation, its amount and the identity of the ultimate beneficiary.

DONT'S

- Don't offer or receive donations in cash.
- Don't make any charitable donation to a political party and don't make political contributions disguised as charitable donations.



Sponsorship activities



Altran, as part of its advertising strategy, sponsors events and organizations with the objective to positively communicate on its operations. The sponsorship activities should always be made in compliance with international anti-corruption laws.

Sponsoring is offering material support to any project, competition, entertainment activity or event with the objective of benefiting from the publicity around it.

Sponsorship activities may raise anti-corruption issues. To mitigate this risk, all sponsorship activities must be approved at Group level.

Sponsorship activities must be compliant with the following minimum standards:

- All sponsorship activities should be in accordance with the approved budget;
- Sponsees should be entities or individuals that are well-known and reliable;
- In the case of companies, a sponsee must prove that it has all the requested certifications and has satisfied all requirements for operating in compliance with applicable laws;
- The sponsorship agreement must be in writing and must contain:
 - The currency and the amount to be paid;

- The billing terms (or methods of payment) and payment terms, specifying that such payments will be made exclusively to the counterparty and to an account in its country of incorporation for entities / residence for individuals, and never to numbered accounts or in cash);
- The commitment of the counterparty to comply with applicable anti-corruption laws and the anti-corruption provisions of the relevant sponsorship agreement.
- The amount paid must be properly and transparently recorded in Altran's books and financial records;
- Altran must ensure that payments are made subject to the verification that the sponsored event or activity has taken place.

EXAMPLES OF RED FLAGS

- The sponsored entity insists on the use of side letters or refuses to put agreed terms in writing.
- The sponsored person requests that the payment be made to an account in a tax heaven (e.g. British Virgin Islands, Bahamas, Luxembourg etc.) or in a country with a high rate of corruption.
- The sponsored person is requesting that the payment be made to a bank account that is not identified as his own.

DO'S

- Sponsor a Non-Governmental Organization, company or individual who shares our principles and values.
- Always sign a sponsoring agreement before making any payments.
- Assess the potential outcome of the sponsorship specifically with regards to Altran's image and reputation.

DONT'S

- Don't sponsor any activity, event, entity or individual before a contract is concluded and duly signed.
- Don't sponsor any individual / event directly in cash.



Political contributions



At Altran, we conduct our business with governments and their agencies, officials and related personnel with transparency and upright in all our actions.

Political contributions could constitute corruption offences and therefore present a risk of substantial liability and cause reputational damage. The risks arising from political contributions are that they may be used by a company as an improper means for bribery to retain or obtain a business advantage such as winning a contract, obtaining a permit or license, or influencing legislation favorable to the business of Altran.

Because of these risks, **Altran does not permit any direct or indirect contributions** in whatever form to political parties, movements, committees, political organizations and trade unions, nor to their representatives and candidates (altogether, "Political Contributions").

EXAMPLES OF RED FLAGS

- The contemplated transaction between Altran and the Third Party relates to charitable or political contributions.
- The contemplated transaction entails business relationships with Government Officials or public entities (government or regulator).

DO'S

- Be mindful of Altran's reputation and how the public would perceive our actions when engaging with Government Officials.

DONT'S

- Don't use or allow the use of any Altran assets or resources for any political campaign by a political party, political candidate, elected official or any of their affiliated organizations.

Conflicts of interest

Our personal interests must not interfere in the activities we conduct on behalf of Altran or its subsidiaries. They must not give rise to any conflict of interest. At Altran, we shall always act in the best interest of the company and report any circumstance that may generate a conflict of interest.

Conflicts of interest arise when an employee's personal interests may:

- Influence the quality of his/her professional performance: our commitment to operational excellence is hindered by the idea of a potential personal benefit or interest;
- Bias business decision: our professional judgment or decision is influenced due to private relationships with a Third Party;
- Lead to non-compliance with Altran's Policy and business guidelines: our standard working practices are by-passed in order to gain a personal advantage.

The three most common situations that can lead to a conflict of interest are:

- **The development of an "outside business interest"** i.e., owning or investing in a company that has a direct or indirect connection with Altran; having a management position (e.g. Board Director) in a company with whom Altran is / could

enter into business; hiring relatives of a key Third Party with whom Altran is conducting business.

The risk of a conflict of interest may be increased when an employee owns shares in a Third Party's company or/and undertakes business activities in addition to his/her job with Altran.

- **The favoritism of family and friends** i.e., interacting with the friends or relatives of Third Parties with whom Altran conducts business; hiring family members at Altran without disclosing it; favoring activities with former Altran employees who now run their own business.

When we develop long term relationships with Third Parties, we may become personally involved with our counterparts. Being friends with a Third Party representative could appear as favoritism if we do not act cautiously and implement precautionary measures.

- **Gift offering or other solicitation (please refer to 3.1 Gifts), Hospitality and entertainment.**

We must pay particular attention to potential conflicts of interest: conflicts that do not have direct consequences for the company but could potentially have indirect ones.

EXAMPLES OF RED FLAGS

- **A Third Party requests that you hire a friend or relative or provide him/her with some other advantage in return for an unfair advantage.**
- **An employee who has a very close relationship with a supplier / customer / partner.**

In order to protect you and the Altran Group from the risk of corruption, all employees are expected to:

- Promptly disclose to your Line Manager if there is a potential or real conflict of interest while performing your duties;
- Behave impartially in all business dealings and not give to some companies, organizations or individuals improper advantages;
- Abstain from influencing or taking any decision on behalf of Altran with the idea of deriving any direct or indirect personal benefit.

Please remember that in case of any doubt, you can ask for appropriate guidance from your Line Manager before taking any action

DO'S

- Conduct all business relationships with a professional, objective and transparent approach.
- Apply the standard process when selecting Third Parties: implement regular tender offers, never negotiate with an exclusive supplier, etc.
- Immediately report to your superior any doubt about a situation where a conflict of interest may exist so that an appropriate action can be taken.
- Ensure you act in a way that is free from any conflict of interest.

DONT'S

- Don't jeopardize the financial or reputational integrity of Altran in exchange for financial or other advantages for yourself or your relatives.
- Don't work on any matter in which you or any of your relatives (wife / husband, partner or any other person with whom you have close relations) hold a direct or indirect financial interest.
- Don't hire or ask someone in the company to hire a relative without having informed your Line Manager.

What should I do to ask questions or raise concerns?

Altran does not encourage anonymous reporting. Dedicated channels are available within Altran's organization to raise concerns in full confidentiality, seek advice or report in good faith established or soundly suspected deviations from **Altran's anti-corruption Policy or violations of law without fear of retaliation, discriminatory or disciplinary action.**

- **If you have any questions** regarding this Anti-Corruption Policy or if you may require any additional information, **please feel free to contact Legal Department or Human Resources Department.**
- **If you want to express any concern:**
 - we first recommend that you approach your Line Manager, or your **local human resources director.**
 - **if no answer is provided to you, or if you are not satisfied with the answer thus provided, you can contact : ethic@altran.com**

