

Public

Global

Global Anti-Bribery and Corruption Policy

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A message from our CEO



At Foundever, integrity is not a compliance requirement — it is a core part of who we are.

As a global organization operating across more than 45 countries and serving clients in over 60 languages, we carry a profound responsibility: to conduct our business with honesty, transparency, and unwavering ethical standards — every day, in every market, at every level of our organization.

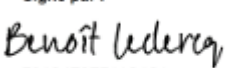
Corruption, in all its forms, is fundamentally incompatible with our values. It undermines trust, distorts fair competition, and causes lasting damage — to our people, our partners, and the communities we serve. This is why Foundever applies a strict zero-tolerance policy toward any form of bribery, corruption, or influence peddling, whether direct or indirect, active or passive, public or private.

This Global Anti-Bribery and Corruption Policy reflects our commitment to the highest international standards, including ISO 37001, the UK Bribery Act, the U.S. Foreign Corrupt Practices Act, and the French Sapin II Law. It provides each of us — from senior leadership to every associate across the Group — with clear guidance on how to recognize risk, make the right decisions, and act with confidence when faced with difficult situations.

I want to be clear: compliance with this Policy is not optional. It is a condition of employment and a shared responsibility. Leadership sets the tone, but integrity must be lived at every level of our organization. I expect every manager to lead by example and every associate to read, understand, and apply these principles in their daily work.

I also want to reinforce that speaking up is both a right and a duty. Foundever protects individuals who, in good faith, report concerns or suspected misconduct, and strictly prohibits any form of retaliation against them. Our reporting channels — including EthicsPoint — exist to ensure that no one ever has to face an ethical dilemma alone.

Together, we build a culture where doing the right thing is the only way we do business.

Signé par :

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Benoît Leclercq
Chief Executive Officer, Foundever

1. Purpose of the Document

At Foundever, we value and promote a culture of integrity, transparency, and ethical behavior in all our business activities. We reject any form of corruption or influence peddling and apply zero tolerance to violating this principle.

This Policy is based on best international practices and is designed to support compliance with anti-corruption laws in the jurisdictions where Foundever operates. A more detailed list of the legal references applicable to this Policy is provided in [the Annex](#). The list of applicable laws is reviewed at least twice a year. Any potential impact on this Policy and the related procedures listed in the [Referenced documents](#) section below is assessed accordingly, and the relevant documents are updated where necessary.

This Policy further defines the standards, responsibilities, and requirements to prevent corruption in all our activities for all Associates, including senior executives throughout the Group.

2. Scope of Application

This policy applies to Foundever S.A. (hereinafter "Foundever S.A.") and all its subsidiaries operating worldwide (collectively "Foundever").

For entities in which Foundever SA holds less than 50% of the voting rights, we are committed to promoting the adoption of similar policies and standards of control comparable to those of Foundever SA.

All Associates must act with honesty, integrity, and fairness regardless of their position or hierarchical level. They must comply with all anti-bribery and anti-corruption laws in force in the countries where Foundever operates, and abide by this Policy and its associated procedures.

Our business partners (suppliers, service providers, intermediaries, agents, subcontractors, etc.) are also required to respect this Policy's principles or apply standards that are at least equivalent. They are also required to promote these principles among their partners.

This Policy is not intended to cover every situation that Associates may encounter. It sets out the fundamental rules that should guide them in their decisions. It is, therefore, everyone's responsibility to read this Policy carefully, understand its rules, and exercise discernment in the face of the various situations that may arise.

3. Definitions

For the purposes of this Policy, the following terms are defined as follows:

Business introducer or intermediary	Person putting a prospect (<i>customer</i>) in touch with a salesperson or company (<i>beneficiary</i>) in return for a pre-defined commission or fee. The purpose of business referrals is to bring together people who are likely to enter into a contract with each other.
Corruption / Bribery	An offer, promise, gift, acceptance or solicitation of an advantage as inducement for an illegal, unethical or untrustworthy action by a PEP, private company or individual.
Gift	Anything of value, including money, gift cards, meals, goods or services that, when given or accepted reasonably and in good faith, constitutes a token of friendship or appreciation.

Conflict of interest	A situation where a person is faced with a decision between fulfilling the obligations and expectations of their role and their personal interests.
Political contribution	Any contribution, in cash or in kind, intended to support a political cause or paid to a political party or one of its representatives.
Donations and sponsorships	A donation is material or financial support given without expectation of return, intended to support a cause, organization, or individual without expectation of consideration. Donations are usually made for philanthropic or charitable reasons. They are not intended to obtain tangible or promotional benefits for the donor. Sponsorship involves providing material or financial support to a company, person, or organization with the explicit aim of deriving a direct benefit, particularly regarding image. Sponsorship is common in the artistic, sporting, educational, and charitable sectors but it can also extend to other fields. The main aim of sponsorship is often to increase the company's visibility and reputation through association with the sponsored event or activity. The main difference between a donation and a sponsorship lies in expectations: a donation is made without expecting a return, whereas a sponsorship is made to obtain a direct benefit for the company. If a donation promotes the company's image, it must be required as a sponsorship.
Associates	All Foundever staff, including interim, temporary, and permanent Associates and trainees. This also includes directors and administrators.
EverConnect	This is the intranet platform accessible by Group Associates.
Favoritism	Favoritism is the preferential treatment of one person or group to the detriment of another. In some countries and under certain conditions, favoritism that prevents fair competition may be considered illegal.
Hospitality	Represents travel and accommodation expenses. The most common examples are : • Customer or partner trips, • Transportation: plane, train, or rental car tickets • Accommodation: hotels and all other types of accommodation • Visits to production sites or factories, • Cultural or sporting events: tickets for any sporting event (Rolland Garros, soccer or golf matches, etc.) or to attend a show (opera concert).
Facilitation payments	The French Anti-Corruption Agency defines facilitation payments as the direct or indirect undue remuneration of a public official for carrying out administrative formalities that should be obtained through normal legal channels. The purpose of facilitation payments is to encourage public officials to perform their duties more efficiently and diligently.

Politically exposed person (PEP)	A "PEP" is defined by the Financial Action Task Force (FATF) as an individual who is or has been entrusted with a prominent public function. Due to their position and influence, it is recognised that many PEPs are in positions that potentially can be abused for the purpose of committing money laundering (ML) offences and related predicate offences, including corruption and bribery, as well as conducting activity related to terrorist financing (TF). Examples of prominent public functions: Heads of State or of government, senior politicians, senior government officials, judicial or military officials, senior executives of state-owned corporations, important political party officials
Influence peddling	Occurs when an individual who has real or apparent influence over someone else offers, promises, or agrees to exchange his or her influence for an undue advantage. In some countries, influence peddling is illegal when the person offering or agreeing to exert influence is a public official.
Associated third parties	Any person, company, or entity that has or intends to have a contractual relationship with Foundever, such as customers, subcontractors, suppliers, consultants, sales agents, intermediaries, or joint venture partners.
Third parties	A person who is a party to a contract or transaction but is not one of the principal parties. Examples include a person who is a buyer for one of the parties, a witness to the signing of an agreement, or a person who has made an offer that has been rejected.

4. Applicable Laws

This Policy sets out the principles that govern our conduct to ensure compliance with anti-corruption laws and international standards applicable to our activities. A non-exhaustive list of country-specific laws of reference applicable to this Policy is provided in [the Annex](#). This includes, but is not limited to:

- The Organization for Economic Co-operation and Development (OECD) Anti-Bribery Convention;
- The United Nations Convention against Corruption;
- The U.S. Foreign Corrupt Practices Act (FCPA);
- The French law of December 9, 2016, on transparency, the fight against corruption, and the modernization of economic life, also known as the "Sapin II Law";
- The UK Bribery Act.

ISO 37001 standards

Foundever's anti-corruption management system is informed by ISO 37001 and is designed to support a risk-based, proportionate, and continuously improving approach to the prevention, detection, and remediation of bribery and corruption risks. This Policy reflects the governance principles, organizational roles, controls, training, reporting mechanisms, and monitoring activities established to support the effectiveness of this system.

5. Zero Tolerance for Corruption and Influence Peddling

At Foundever, we apply a zero-tolerance policy to all forms of corruption and influence peddling, whether private or public, direct or indirect, active or passive.

THERE ARE SEVERAL TYPES OF CORRUPTION

Private bribery	Public corruption
Corruption involves natural or legal people in the private sector.	Corruption involves a person performing a public function ("public official" as defined below).
Active bribery	Passive bribery
The fact that a person "remunerates" the performance or non-performance of an act by a private individual or public official.	The fact that a private individual or public official allows himself or herself to be "bribed" to perform or not to perform an act in his or her official capacity.
Direct bribery	Indirect bribery
Any person who incites or facilitates corruption may be considered an accomplice to the crime of corruption by the courts.	Indirect corruption involves the use of intermediaries such as consultants, agents, etc..

These practices are strictly forbidden within Foundever, and any breach exposes Associates to disciplinary measures up to and including dismissal, as well as fines and even imprisonment.

Associates must ensure that their actions, as well as their relations with stakeholders (clients, suppliers, partners, etc.), comply with the law and Foundever's compliance standards.

Foundever's Anti-Corruption Program

Foundever has developed a program to combat corruption and influence peddling and reduce the corresponding risks. The program is based on **three pillars**: prevention, detection, and remediation.

6. Prevention

6.1. A dedicated organization

Foundever SA's Board of Directors oversees the company's anti-corruption program in compliance with international laws and standards.

The Chairman and Chief Executive Officer (CEO) must demonstrate exemplary leadership and an ongoing commitment to corruption risk management. This includes implementing, maintaining, and regularly reviewing this Policy and its objectives to prevent corruption within the organization.

To this end, it has appointed a "Referent" in accordance with the French "Sapin II Law", who sits on the Board of Directors and is a member of the Risk and Compliance Committee.

The CEO has also established a dedicated internal organization led by the Global Business Ethics & ESG Reporting Department, which reports to the Global Chief Legal Officer. This Department coordinates the anti-corruption compliance program, provides guidance, supports local implementation, and monitors the effectiveness of key components of the program. It has appropriate authority and access to relevant information to perform its role and may escalate significant matters to senior management or relevant governance bodies when required.

The Global Business Ethics & ESG Reporting Department is supported by a network of Compliance Officers appointed across the Group's markets. These Compliance Officers contribute to the implementation of the anti-corruption program within their respective scope, including by:

- supporting corruption risk mapping, action plans, and the follow-up of corrective measures;
- contributing to compliance communications and the deployment of relevant policies and procedures;
- supporting the development or adaptation of procedures to ensure consistency with the Group's anti-corruption compliance framework;
- conducting or supporting preliminary assessments of third parties where required;
- supporting awareness initiatives and training activities for Associates exposed to corruption risks; and
- performing compliance checks or supporting responses to customer requests related to anti-corruption matters.

6.2. The Commitment of Management and Associates

In addition to the actions of the Group's governance bodies, each line manager is expected to promote the anti-corruption program and actively lead by example. Managers must regularly reiterate the zero-tolerance message and ensure that Associates under their responsibility understand and apply this Policy, complete assigned training, raise concerns when appropriate, and comply with applicable controls and approval processes.

Every employee also has a responsibility to combat all forms of corruption.

As such, it is formally forbidden:

- Allowing oneself to be bribed or bribing a private individual or a public official, directly or through the use of an intermediary;
- Involvement in corruption-related offences (influence peddling, favoritism, illegal interest-taking, money laundering, etc.).

Associates must take ownership of this Policy and be vigilant in their day-to-day activities. They must also ensure that relations with stakeholders (customers, suppliers, etc.) comply with Foundever's compliance standards.

6.3. Procedures and Guidelines

Foundever has introduced internal standards to ensure its business practices comply with the Code of Conduct and anti-corruption regulations.

These are based on the **present Policy**, which sets out the framework and organization of the Group's Anti-Corruption Compliance Program, supplemented by Procedures, each dealing with a **specific theme** and some containing guidelines.

6.3.1. Procedure for Gifts, Meals, and Hospitality



What's it all about?

Gifts, meals, and hospitality are often used to maintain good business relationships. They can also be offered in a business context to show appreciation or strengthen partnerships.

Gifts can be given to external partners, such as customers, suppliers, or service providers, or received by Group Associates.

What are the risks of corruption?

Depending on the circumstances, gifts, entertainment, and other benefits (such as meals, travel, or accommodation) may be perceived as attempts to influence a third party's decision to obtain an undue advantage, such as a contract, confidential information, or advantageous conditions.



The rules



Gifts, meals, and entertainment are not illegal when given or received without expectation of consideration. In all circumstances, however, they must comply strictly with the requirements of the [Group's Procedure on gifts, meals, and entertainment](#).

Foundever has established thresholds above which it is necessary to notify and obtain the supervisor's approval and the opinion of the local Compliance Department before offering or receiving a gift or meal. These approvals or opinions are requested and received using an internal tool called Compliance Shield, the link to which can be accessed from EverConnect.

No threshold has been set for hospitality. Whether offered or received, all such benefits must be declared and/or approved by the line manager and the Compliance Department.

The global guidelines provide an indicative list of acceptable practices to help Collaborators assess what can be offered or accepted.



The right reflexes

- **Demonstrate transparency:** offer or accept a gift, meal, or token of hospitality publicly and without concealment
- **Have a legitimate purpose:** do not offer or accept gifts, meals, or hospitality to influence the recipient.
- **Show moderation:** refuse lavish gifts, meals, or hospitality.
- **Be vigilant about frequency:** don't regularly offer or receive gifts, meals, or hospitality from the same third party
- Respect the evaluation and validation procedure

What should I do if I receive a gift not authorized according to the procedure?

- Politely refuse and return the gift at the buyer's expense
- Report to your direct line manager, local compliance officer, or the Global Business Ethics & ESG Reporting Department.

What would you do?

David, from the purchasing/procurement department, is offered the chance to drive a race car for a weekend by a vendor as a thank-you for his involvement in signing a contract.

How should he react?

David must refuse the vendor's offer and declare this to his Supervisor and the local Compliance Officer. Such an offer could create the appearance that the supplier was chosen because of the gift and not based on objective criteria. Furthermore, as a member of the Purchasing Department, David is

subject to the "**No Gift**" policy for gifts received and must comply with it.

Case Study 2:

Marion, from Sales, would like to invite a customer to a five-star restaurant to discuss future business opportunities.

Should she maintain her choice of restaurant?

Marion should opt for a more modestly priced restaurant. According to Foundever guidelines, offering or receiving meals in luxurious establishments is not advisable, as this could be perceived as an attempt to influence the business relationship or obtain benefits in return.

6.3.2. Donations and Sponsorships



What's it all about?

Donations and sponsorships are initiatives that enable Foundever to support important causes while reinforcing its social commitments and public image. Donations are primarily aimed at supporting non-profit organizations, with no expectation of direct compensation, while sponsorships offer the company an opportunity to raise its profile and associate its values with social, cultural, or sporting projects. These actions strengthen external partnerships and contribute to the company's positive reputation.

What are the risks of corruption?

Donations, sponsorships, and patronage can be used to conceal an undue advantage. Whatever their value, they may turn out to be or be considered to be acts of direct or indirect corruption. This risk is accentuated when the beneficiary events or activities have direct or indirect links with public officials.



The right reflexes

- Do not initiate a donation or sponsorship to obtain an undue advantage (signing a contract with a customer, obtaining a service, etc.).
- Do not make donations or sponsorships to members of government or political parties. This initiative could be perceived as an effort to obtain or keep a contract or give the impression of an act of corruption.
- Do not donate to or sponsor an organization that engages in illegal activity or has a bad reputation.
- Always contact a local compliance officer or the Global Business Ethics & ESG Reporting Department for all requests for donations or sponsorships.



The rule

Any employee wishing to participate in a donation or sponsorship initiative should contact their local compliance officer or the Global Business Ethics & ESG Reporting Department.

An in-depth analysis of the context of the initiative and the beneficiary organization will be carried out to determine whether the operation presents a risk for Foundever.

This assessment is based on information from two questionnaires, one completed by the *requester* and the other by the beneficiary organization. These questionnaires provide the information required for a complete and transparent analysis.

For more details on the procedure, including examples of recommended and not recommended activities please consult the [Donation and Sponsorship Procedure](#) available on Everconnect.

What would you do?

Marion from Sales is in the middle of an RFP with a customer. She receives an e-mail from him suggesting that she donate to a charity that organizes sporting events. The customer specifies in the e-mail that the donation is to be made in cash and that the funds are to be sent to him at an event to be held on his premises.

How should Marion react?

Marion must not give her answer without the agreement of her line manager and the local compliance officer. This request raises several risks: (i) the company and the customer are in the middle of negotiations (RFP), (ii) the

customer is the one who chooses the charity. It is possible that one of the client's representatives is a founder of the beneficiary organization, (iii) the client wishes to receive the funds in cash. Foundever does not recommend cash donations.

This could be perceived as a bribe paid to the customer to secure the contract.

Please note: *it is not recommended to make donations or sponsorships to an organization of which a client or one of his representatives or collaborators is a founder*

6.3.3. Political Contributions



What are political contributions?

Political contributions include but are not limited to: contributions made to public officials, political parties, and candidates in public elections, either directly or indirectly through third parties.

Contributions may be cash, gifts, services, advertising or any other form of support.



Political contributions can be perceived as an attempt to exert undue influence on public decision-makers.

This can lead to corruption charges if contributions are seen as a means of obtaining favors or advantageous decisions.



The rule:

Any contribution, financial or in kind, direct or indirect, made by Foundever or its Associates on its behalf to political organizations, parties, or personalities is prohibited.

What are the risks of corruption?



The right reflexes

- Donate or join a political party using your personal assets and without referring to your status as a Foundever employee.
- Refuse all solicitations for political support from Foundever, whatever their form.

6.3.4. Facilitation Payments



What are facilitation payments?

Facilitation payments are defined in [section 3](#) above. They are generally modest sums of money or other discreet advantages paid to a public official to speed up an administrative procedure to which the applicant is already entitled. They are rarely accompanied by receipts or official documentation.



What are the risks of corruption?

In many countries, such as France, facilitation payments constitute an act of corruption and are prohibited. The penalties for these are the same as those for bribery.



The rule

Foundever strictly prohibits facilitation payments.



The right reflexes

All Associates must courteously refuse any request for facilitation payments based on this Policy and must inform their line manager and local Compliance Manager as soon as possible.

What would you do?

John, a Facilities Coordinator at Foundever, is managing the renewal of an operational permit for a site location. During the process, a representative from the Bureau of Fire Protection (BFP) informs him that an “honorarium fee” must be paid immediately to facilitate the required training before the permit can proceed. The representative further states that the payment should be made directly to them and advises that no formal documentation or official receipt will be issued.

How should John react?

This situation raises significant ABAC concerns and should be treated as a potential improper payment request. John should remain professional and avoid agreeing to or processing the payment. He should:

- Request written clarification regarding the purpose and legal basis of the fee.
- Explain that Foundever policy requires all government-related payments to be

formally documented, reviewed, and approved.

- Refuse any unofficial or undocumented payment request.
- Pause the transaction until the legitimacy of the request is confirmed through proper channels.
- Immediately escalate the matter to his Supervisor and the local Compliance Officer for guidance and review.

Foundever maintains zero tolerance for bribery, facilitation payments, or any form of corruption. Employees must ensure that all government-related payments are legitimate, transparent, properly documented, and processed only through authorized procedures with official receipts

6.3.5. Conflicts of Interest



What are conflicts of interest?

A conflict of interest arises when an employee's personal interests conflict with or appear to conflict with the company's interests.



What is the risk in terms of corruption?

This situation can call into question the objectivity, neutrality, and impartiality of a decision and create a context conducive to acts of corruption, influence peddling, illegal taking of interest, or favoritism.



The rule

Associates must immediately report any potential conflict of interest to their line manager, the Human

Resources Department, and/or via the reporting system described in [section 7.1](#).

In the event of a perceived or actual conflict of interest, the line manager, with the assistance of the Human Resources Department, will take all necessary steps to enable the Employee to avoid the conflict and mitigate the risk. This may involve removing the employee concerned from the decision-making process, which could give rise to a conflict of interest.

please consult the [Conflict of Interest Procedure](#) available on Everconnect for more details.



The right reflexes

- Be vigilant and recognize situations where your personal interests or those of someone close to you could influence your professional decisions.
- Immediately inform your line manager or the Compliance Department of any actual or potential conflict of interest. Transparency is crucial.
- Avoid direct involvement: In the event of a conflict of interest, withdraw from the decisions or actions concerned and ask to be replaced by an impartial colleague.
- Respect company policies on conflicts of interest to ensure appropriate risk management.
- Be open and transparent with all relevant stakeholders (colleagues, customers, and partners) about the actions taken to manage the conflict of interest.

What would you do?

Corinne from the Legal Department is also a shareholder in Forma, a company that offers legal training courses. She says she would like to offer Forma's services to Foundever to meet her needs.

What advice would you give Corinne?

In this situation, Corinne would be both the originator and the service provider of a service order for Foundever. This could give rise to a conflict of interest, as Corinne would ultimately benefit from the sums paid by Foundever to Forma.

To ensure that Foundever's interests are protected, Corinne should inform her line manager and the Purchasing Department of this situation before signing any binding contracts with Forma. Indeed, Foundever's service providers and suppliers must be independently and objectively assessed on the quality of their services or products associated with the corresponding price. In this case, Corinne must not be involved in choosing a supplier.

6.3.6. Assessment of Third Parties risks



What are third parties?

Third parties include all persons and companies with whom Foundever collaborates in the course of its business activities.

The annual risk mapping exercise determines the typology of third parties concerned by these assessments.



What is the risk in terms of corruption?

Foundever may be held liable if a third party commits an act of corruption on behalf of Foundever or if Foundever knowingly benefits (or could not reasonably have been unaware of) an act of corruption committed by a third party.



The rule

Foundever has implemented third-party assessment measures that comply with the applicable laws mentioned in [section 4](#). Based on a risk-based approach, these assessments concern potential or existing business relationships and must be performed before entering into or renewing a business relationship where the risk profile requires it.

The level of due diligence is proportionate to the nature of the relationship, the services provided, the country risk, the involvement of public officials or politically exposed persons, and any identified red flags.

Business advisors, business introducers, intermediaries, agents, or any third party involved in identifying, introducing, facilitating, or securing business opportunities for Foundever are considered particularly sensitive from an anti-corruption perspective. They are therefore subject to the highest level of due diligence and must be onboarded and managed in accordance with the Global Business Advisors onboarding & management Procedure listed in the Referenced documents section.

The assessment of third parties is intended to ensure that their managers and ultimate beneficiaries:

- Have no history of corruption or other sanctions.
- Demonstrate integrity in their business practices.
- Have a good reputation.
- Have the skills and resources that Foundever is looking for.

Assessments may include:

- Gathering information via our internal tool accessible to third parties.
- Gathering information from open sources and public documents (press articles, financial statements, court decisions).
- Verification of the presence of the third party, its beneficial owners, managers, or directors on sanction lists.
- Gathering additional information through questionnaires, interviews, or audits.

Third parties must provide accurate information during this assessment process.

In the event of an identified risk, Foundever may decide to interrupt discussions, not to establish the contractual relationship, or to terminate the existing contract.

Where appropriate, contracts with third parties must include anti-corruption commitments, audit or termination rights, and obligations to comply with standards equivalent to those set out in this Policy. Third-party relationships may also be subject to periodic review or enhanced monitoring based on the level of risk identified.

All personal data processed by Foundever as part of this process is managed in accordance with the Group's Privacy Policy and applicable data protection laws. Individuals may contact the Personal Data Protection Department at privacy@Foundever.com to exercise their rights, ask questions, or make complaints concerning the processing of personal data.



The right reflexes

Associates should contact their Compliance Department if they detect the slightest suspicious element.

6.3.7. Training and Awareness



What's involved?

All Associates are responsible for complying with Foundever's anti-corruption policies and procedures and for reporting any potential or actual corrupt activity. To enable Associates to recognize this type of situation, Foundever has set up a dedicated training program tailored to the types of risks in the Group's main functions.



What are the risks of corruption?

Untrained Associates may unwittingly participate in corrupt practices, such as paying bribes or manipulating contracts, exposing the company and themselves to investigations and legal proceedings.



The rule

Foundever requires all Associates to regularly attend training courses adapted to their role and to the risks of corruption made available to them. This training enables them to:

- recognize and respond to bribe solicitations.
- Report corruption problems.

- Understand the risks and potential damage to the organization.

An [e-learning](#) program is open to all Associates and available in five languages on the internal training platform.

Specific training sessions are also provided for managers, compliance officers, and Associates deemed most at risk (purchasing, sales, business development, finance, etc.).

Training completion is monitored, and records are retained to demonstrate participation. Training content may be updated periodically to reflect changes in applicable laws, internal procedures, risk mapping results, audit findings, or lessons learned from reported concerns and investigations.

Foundever adopts a proactive communications strategy to support training and raise awareness of the fight against corruption. Communication channels include EverConnect, meetings, and manuals.

Failure to comply with the obligation to train may result in disciplinary action, including dismissal.



The right reflexes

All Associates must actively participate in anti-corruption training and integrate the knowledge acquired into their daily work to recognize and react to signs of corruption, such as unusual payments, requests for favors, or suspicious behavior by third parties.

A question? A doubt?

If you have a question or doubt about any of the situations described above or about any other element of the Anti-Corruption and Influence-Peddling Program, please do not hesitate to contact your local Compliance Officer or the Global Business Ethics & ESG Reporting Department at globalcorporatecompliance@foundever.com.

7. Detection

7.1. Reporting potential violations

All Associates are required to report facts that may constitute behavior in breach of this Policy's principles and rules.

To do so, they may contact :

- The Global Business Ethics & ESG Reporting Department ([Contact the Global Business Ethics Department](#)), or
- Use EthicsPoint at www.ethicspoint.com, or the toll-free number listed on the website, as set out in the [Global Security, Privacy and Ethics Incident Management Policy](#).

Foundever strictly prohibits retaliation against individuals who, in good faith or based on reasonable belief, report concerns regarding attempted, actual, or suspected money laundering, bribery, and corruption or violations of Foundever's Anti-Money Laundering Policy, Anti-Bribery and Corruption Policy, or Code of Business Conduct and Ethics. Individuals making such reports are protected from retaliation.

Reports are handled with appropriate confidentiality, subject to applicable laws and the need to conduct a proper review or investigation. Foundever expects all reports to be made in good faith or based on reasonable belief and strictly prohibits knowingly false or malicious reports.

Failure to report a violation of this policy in certain countries may constitute a breach of this policy and the Global Code of Conduct and Ethics, which may result in disciplinary action as described in [section 8](#).

7.2. Controls and audits

Foundever maintains an anti-corruption control framework designed to prevent, detect, and address corruption and influence-peddling risks across its activities.

Associates with operational responsibilities are expected to ensure that appropriate controls are implemented within their scope of responsibility, including proper approval processes, documentation, traceability of decisions, and compliance with the Group's internal policies and procedures.

Global Business Ethics acts as a second line of defense by defining anti-corruption standards, providing guidance, supporting the deployment of the compliance program, and monitoring the implementation of key anti-corruption controls on a risk-based basis.

Internal Audit acts as the third line of defense and may independently assess the effectiveness of the anti-corruption control framework, including the design and implementation of relevant controls. Where areas for improvement are identified, appropriate corrective actions are defined and followed up in accordance with Foundever's governance processes.

Control results, identified weaknesses, and related remediation actions are documented and followed up in line with Foundever's governance processes.

This control framework supports the continuous improvement of Foundever's anti-corruption program and helps ensure that it remains proportionate to the Group's risk exposure and aligned with applicable laws and international standards.

7.3. Accounting books and records

Foundever maintains detailed and accurate financial books and accounts, supported by an internal control system ensuring full traceability of all funds and assets.

All financial movements are properly reported and recorded. To achieve this, Foundever uses an internal accounting control system that faithfully records all transactions, assets, and financial positions.

Supporting documents for payments and payment requests must be kept, and the classification of accounting codes must comply with standard accounting rules and procedures.

No transaction may be mischaracterized, concealed, split, or recorded in a misleading manner. Payments must have a legitimate business purpose, be supported by appropriate documentation, and be processed through approved payment channels.

Associates must not hold or create company funds in unauthorized accounts without transparency,

submit false invoices, or claim reimbursement for unusual, excessive, or unjustified expenses. Any

breach of these policies may result in disciplinary action.

8. Remediation and Disciplinary Measures

Where a weakness in the anti-corruption program is identified, Foundever may implement corrective actions, including process improvements, additional controls, targeted training, enhanced monitoring, or disciplinary measures where appropriate.

Any violation of this Policy by an Employee may lead to disciplinary action. Depending on the severity of the misconduct and applicable law, such action may include:

- verbal warning;
- written warning;
- final warning;
- termination of employment;
- any other corrective or punitive measure appropriate to the circumstances.

The primary purpose of disciplinary action is to identify risks, promote improvements, and emphasize the consequences of inappropriate actions.

Foundever will not pay any fine imposed on an individual for violating this Policy.

Suspension may also be used as a disciplinary measure during an investigation or at the discretion of Foundever management when it is appropriate to remove an individual or group of individuals from a situation pending the outcome of the investigation. The length of the suspension depends on the nature of the investigation and local legislation. It is important to note that suspension does not prejudice guilt or the likely outcome of the investigation.

9. Policy Communication

This Policy is available to all Associates and associated Third Parties on internal ([EverConnect](#)) and external ([website](#)) communication media.

Document Management

10. Document ownership

The **Document Owner** below is responsible for ensuring that this corporate document is managed, reviewed periodically, and updated when required, including following changes in applicable laws, risk mapping results, audit findings, significant incidents, organizational changes, or updates to related procedures.

Corinne Suné
Head of Global Business Ethics & ESG Reporting
Corinne.sune@foundever.com

The **Document Custodian** is the person designated by the **document owner** to carry out an annual review and update of this document to ensure the protection of our activities and personnel and compliance with our contractual obligations.

Document Editor :
Elodie Etoundi Le Dantec
Global Business Ethics Manager
Elodie.ledantec@foundever.com

11. Storage and use

The latest version of this document can be accessed via the following links:

- For Associates: [EverConnect](#)
- For third parties: [Foundever website](#)

A printed copy is an uncontrolled document. The users of this document are responsible for ensuring that they are using the most recent version.

12. Document identification

Title	Global Anti-Bribery and Corruption Policy
Creation date:	December 2011
Current version:	5.3

13. Referenced documents

Reference	Title
GLO-SEC-PL-010	Foundever Global Security policy
GLO-SEC-PL-400	Global security, Privacy, and Ethics incident management policy
GLO-COMPL-PL-003	Global Code of Conduct and Ethics
GLO-COMPL-PL-410	Group policy to combat money laundering and the financing of terrorism
GLO-COMPL-PR-001	Global Gifts, meals, and hospitality Procedure

GLO-COMPL-PR-002	Global Donation and sponsorship Procedure
GLO-COMPL-PR-003	Global Business Advisors onboarding & management Procedure
GLO-COMPL-PR-004	Global Conflict of Interest Procedure

14. History

Version	Date	Author	Description
0.3	December 2011	Jon Staniforth	Project
0.4	January 2012	Jon Staniforth	Project updated with comments from Legal Department
1.0	March 2012	Kerry Brine	Version updated after approval
1.1	January 2013	Kerry Brine	Modification of information classification. Approval of public release by the Legal Department.
1.2	May 2013	Jayendra Tiwari	Updated after the 2013 revision
1.3	August 3, 2014	Kerry Brine	CWG approval after 2014 revision
1.4	October 22, 2014	Paula Walker	Updated with feedback from external advisors
1.41	November 7, 2014	Kerry Brine	Approved by the Audit Committee
1.5	August 12, 2015	Kerry Brine	Policy owner review. No change. CWG approval in 2015
1.51	August 03, 2016	Jayendra Tiwari	Global anti-corruption policy
1.52	August 24, 2017	Kerry Brine	Annual review. No changes are proposed.
1.53	August 31, 2018	Joe Trias	Annual review. CWG approval.
1.54	August 23, 2019	Joe Trias	Annual review. CWG approval.
2.0	April 2020	Catherine Trujillo	Additional global research
2.1	August 2020	Reid Houser	Annual review. CWG approval.
2.2	August 2021	Reid Houser	Annual review. CWG approval.
3.0	August 2022	Corinne Suné	Policy owner changed - Updated - reference to new global policies (purchasing policy, anti-money laundering policy) -- Approved by Owner.
4.0	March 2023	Elodie Etoundi Le Dantec	The policy has been updated to the new brand format, and the Definitions section has been updated (the term "government representative" has been replaced by "politically exposed person (PEP)"). This has been approved by the Owner.
5.0	September 2024	Elodie Etoundi Le Dantec	Updated and added references to anti-corruption procedures - Approved by Owner
5.1	June 2025	Elodie Etoundi Le Dantec	Annual review
5.2	July 2026	Elodie Etoundi Le Dantec	Annual review , examples added for facilitation payments
5.3.	31 July 2026	Corinne Suné	Added preamble signed by the CEO, the reference to the Conflict of Interest Procedure, annex with reference to ABAC laws

Annex – List of Country-laws of reference for this Anticorruption Policy

Country	Primary ABAC Law(s)
Australia	Criminal Code Act 1995 – Div. 70 (Foreign Bribery)
Brazil	Law No. 12,846/2013 – Clean Company Act (Lei Anticorrupção)
Bulgaria	Anti-Corruption Law (2018) / Penal Code Arts. 301–307
Canada	Corruption of Foreign Public Officials Act (CFPOA)
China	Anti-Unfair Competition Law / Criminal Law Arts. 385–393
Costa Rica	Law No. 8422 – Law against Corruption and Illicit Enrichment
Côte d'Ivoire	Law No. 2013-451 on Corruption Prevention / Penal Code
Cyprus	Prevention of Corruption Law (Cap. 161) / Law 23(I)/1994
Egypt	Law No. 106/2013 (Anti-Corruption) / Penal Code Arts. 103–111
El Salvador	Ley de Probidad / Penal Code Arts. 330–335
Finland	Penal Code Ch. 16 §§ 13–14 / Ch. 30 §§ 7–8
France	Sapin II Law (Law No. 2016-1691)
Germany	Criminal Code (StGB) §§ 331–335
Greece	Law 3560/2007 / Penal Code Arts. 235–242
Hungary	Criminal Code Arts. 290–295
India	Prevention of Corruption Act (PCA) 1988, amended 2018
Ireland	Prevention of Corruption Acts 1889–2010 / Criminal Justice Act 2011
Italy	Law No. 190/2012 (Severino Law) / Penal Code Arts. 318–322
Madagascar	Law No. 2016-020 Anti-Corruption / Penal Code
Malaysia	Malaysian Anti-Corruption Commission Act (MACC Act) 2009
Mexico	General Law of the National Anti-Corruption System (LGSNCA)
Morocco	Law No. 46-19 (INPPLC) / Penal Code Arts. 248–256

Country	Primary ABAC Law(s)
New Zealand	Crimes Act 1961 (ss. 99–105C) / Secret Commissions Act 1910
Nicaragua	Law No. 438 – Probity Law / Penal Code
Norway	Penal Code §§ 387–389 (Straffeloven)
Panama	Law No. 59 (2015) / Penal Code Arts. 345–360
Peru	Law No. 30424 (Corporate Liability) / Penal Code Arts. 397–401
Philippines	Republic Act No. 3019 – Anti-Graft and Corrupt Practices Act
Poland	Criminal Code Arts. 228–230 / Act on Limitation of Commercial Activity
Portugal	Penal Code Arts. 372–374 / Law 20/2008
Romania	Law No. 78/2000 / Penal Code Arts. 289–294
Senegal	Penal Code Arts. 159–163 / OFNAC Law (Law 2012-30)
Serbia	Law on Anti-Corruption Agency / Criminal Code Arts. 367–368
South Africa	Prevention and Combating of Corrupt Activities Act (PRECCA) No. 12/2004
Spain	Penal Code Arts. 419–427 / Law 9/2017 on Public Contracts
Sweden	Penal Code Ch. 10 §§ 5a–5e
Türkiye	Turkish Penal Code Arts. 252–255 / Law No. 3628
UK	UK Bribery Act 2010
USA	Foreign Corrupt Practices Act (FCPA)

