



# Policy 政策

# Anti-Bribery and Corruption Policy 反贿赂和腐败政策

This leaflet is dedicated to the fight against corruption and fraud in companies and the reflexes to have.

## 1. DEFINITION

At Altyor, we strictly prohibit bribery, fraud, money laundering and all other acts of corruption. We require our employees to comply with the law and to maintain consistently high ethical standards, as set out in our various CSR policies.

We will enforce relevant anti-fraud, anti-bribery and anti-corruption laws in all jurisdictions in which we operate. Losses due to fraud, bribery and other acts of corruption can go beyond financial characteristics: they can also damage the company's reputation.

## 2. OUR ANTI-CORRUPTION POLICY

Employees and third parties acting on behalf of the Altyor Group must not accept, directly or indirectly, money, gifts or other gratuities that could influence the decisions they make on behalf of the company. Employees and third parties acting on behalf of the company should not offer gifts or hospitality in the expectation that they and/or the company will benefit, as this could constitute bribery.

A simple rule: generally speaking, personal gifts, which you cannot share with your colleagues or which you do not dare to tell your colleagues or management, are gifts to be refused!

The acceptance and/or offer of small occasional gifts and/or gratuities, such as business lunches or dinners or invitations to events, is acceptable, provided that it is an objectively appropriate expression of professional courtesy and that the recipient is under no obligation.

Any expenditure in excess of €70 must be justified and approved by a line manager.

Any employee who, in good faith, becomes aware of corruption is encouraged to report it through the whistleblowing procedure. Your line manager and/or the Human Resources Department are your key contacts. They will be able to inform you about the nature of unethical behaviour and advise you on the action to be taken in view of the nature of the facts.

## 3. OUR ANTI-MONEY LAUNDERING POLICY

We are aware that counterparties may use us to launder money. We do not aid, abet, participate in or permit money laundering or terrorist financing.

We do not accept funds or other assets that are clearly derived from criminal activity. We do not knowingly deal with criminals, suspects or the proceeds of crime. We do not facilitate the acquisition, ownership or control of proceeds or any other property derived from criminal activity and we do not assist anyone in concealing criminal proceeds or property.

We do not condone or knowingly or intentionally facilitate tax evasion in any form. We implement procedures to prevent the facilitation of tax evasion by our staff and others acting on our behalf.

## 4. OUR CONFLICT OF INTEREST POLICY

Employees and third parties acting on behalf of the company are required to fully disclose any situation in which their personal or other business interests may conflict with those of the company. Any employee who is, or may be, influenced by personal considerations that may interfere with objective decision making should raise their concerns and seek advice from their manager and, if this is not possible, from Human Resources or via the whistleblowing form.

## 5. THE RIGHT REFLEXES

- Refuse to take or give a bribe or personal advantage.
- Resist pressure and report any form of corruption.
- Check the legitimacy of the destination of any payments you make.
- Always inform your manager if you are in doubt.

## 6. HOW TO REPORT BACK ?

If there is any doubt about the appropriateness of an action, the employee or third party should immediately contact a manager and/or raise the issue via the anonymous hotline which will be dealt with as soon as possible:

<https://altyor.com/csr-commitments/>

## 7. REPORTING

Altyor is committed to monitoring its performance on corruption and, to this end, tracks the following indicators:

- Number of confirmed incidents of corruption
- Number of breaches of the code of ethics and CSR policies
- Number of incidents reported through the whistleblowing procedure

## 8. SCOPE

This policy applies to all Altyor Group entities and all external stakeholders of the Group.

## 9. RESPONSIBILITY

The CSR Committee is responsible for defining the anti-corruption policy. It is also responsible for ensuring that the policy is properly implemented, based on information held by the Finance department.

## 10. COMMUNICATION

This policy is communicated annually to all employees through the company's usual channels, including the company's internal rules and intranet, and is presented to all new employees upon their induction. This policy is also distributed to external stakeholders and is available on the Altyor website.

## 11. CONTACT

For more information, please contact Karen Murciano [kmurciano@altyor.com](mailto:kmurciano@altyor.com) or send an email to [contact@altyor.com](mailto:contact@altyor.com).

## 12. REVIEW HISTORY TABLE

This policy is reviewed annually or in the event of a change in related government policy or significant changes in company operations.

This policy was last approved on January 3, 2023 by Yanis Cottard, President of the Altyor Group.

Policy Version	Description of Change
A	N/A
B	Adding KPIs to the policy

这份小册子致力于打击公司的腐败和欺诈行为，以及应具备的条件反射。

## 1. 定义

在Altyor，我们严格禁止贿赂、欺诈、洗钱和所有其他腐败行为。我们要求我们的员工遵守法律，并保持一贯的高道德标准，正如我们的各种企业社会责任政策所规定的。

我们将在我们运营的所有司法管辖区执行相关的反欺诈、反贿赂和反贪污法律。由于欺诈、贿赂和其他腐败行为造成的损失可能超出财务特征：它们还可能损害公司的声誉。

## 2. 我们的反腐政策

代表Altyor集团的员工和第三方不得直接或间接接受可能影响其代表公司所做决定的金钱、礼品或其他酬金。代表公司的员工和第三方不应提供礼物或招待，以期他们和/或公司能从中受益，因为这可能构成贿赂。

一个简单的规则：一般来说，不能与同事分享或不敢告诉同事或管理层的个人礼物，是应该拒绝的礼物！

接受和/或提供偶尔的小礼物和/或小费，如商务午餐或晚餐或邀请参加活动，是可以接受的，只要是客观上适当的职业礼貌的表达，而且接受者没有义务。

任何超过70欧元的此类支出必须有正当理由，并由部门经理批准。

我们鼓励任何善意发现腐败的员工通过举报程序进行举报。你的直线经理和/或人力资源部是你的主要联系人。他们将能够告知你不道德行为的性质，并根据事实的性质向你建议应采取的行动。

## 3. 我们的反洗钱政策

我们知道，交易方可能利用我们来洗钱。我们不协助、教唆、参与或允许洗钱或资助恐怖主义。

我们不接受明显来自犯罪活动的资金或其他资产。我们不故意与犯罪分子、嫌疑人或犯罪所得进行交易。我们不为获取、拥有或控制来自犯罪活动的收益或任何其他财产提供便利，我们不协助任何人隐藏犯罪收益或财产。

我们不纵容或故意或有意识地帮助任何形式的逃税。我们实施程序，防止我们的员工和代表我们的其他人为逃税提供便利。

## 4. 我们的利益冲突政策

雇员和代表公司行事的第三方必须充分披露其个人或商业利益可能与公司利益相冲突的任何情况。任何员工如果受到或可能受到可能干扰客观决策的个人因素的影响，应提出他们的关切，并向他们的经理寻求建议，如果这是不可能的，可向人力资源部或通过举报寻求建议。

## 5. 正确的应对政策

- 拒绝接受贿赂和个人利益/拒绝给予贿赂和个人利益。
- 抵制压力，举报任何形式的腐败行为。
- 检查你支付的任何款项的目的地是否合法。
- 如果你有疑问，一定要告知你的经理。

## 6. 如何报告？

如果对某项行动的适当性有任何疑问，员工或第三方应立即联系经理和/或通过匿名热线提出问题，该问题将尽快得到处理。

<https://altyor.com/csr-commitments/>

## 7. 报告

Altyor致力于监测其在腐败方面的表现，并为此跟踪以下指标

- 经证实的腐败事件的数量
- 违反道德准则和企业社会责任政策的次数
- 通过举报程序举报的事件数量

## 8. 范围

企业社会责任委员会负责确定反腐败政策。它还负责根据财务部门掌握的信息，确保该政策得到妥善执行。

## 9. 沟通

本政策每年通过公司的常规渠道向所有员工传达，包括公司的内部规则和内部网，并在所有新员工入职时向他们介绍。本政策也分发给外部利益相关者，并可在Altyor网站上查阅。

## 10. 联系方式

欲了解更多信息，请联系Karen Murciano [kmurciano@altyor.com](mailto:kmurciano@altyor.com) 或发送电子邮件至 [contact@altyor.com](mailto:contact@altyor.com)。

## 11. 审查历史表

本政策每年审查一次，或在相关政府政策发生变化或公司运营发生重大变化时审查。

本政策最后一次由Altyor团总裁Yanis Cottard于2023年1月3日批准。

政策版本	变更说明
A	N/A
B	在政策中添加关键绩效指标