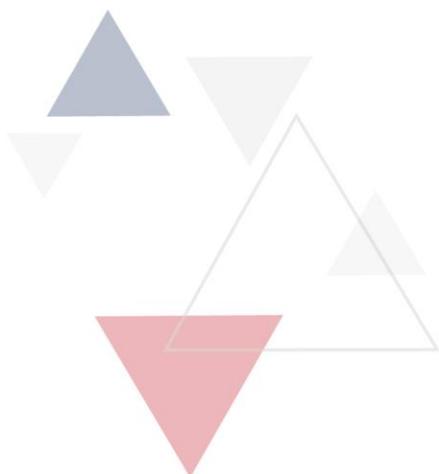
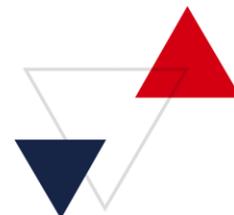




# Code of Conduct

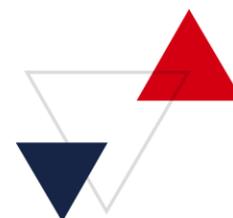
*Approved by the Board of Directors on 22<sup>nd</sup> of May 2023*



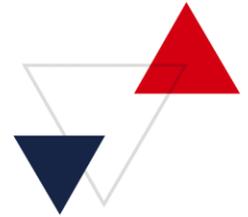


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## MESSAGE FROM THE CEO



As we begin our journey as a new company, I am delighted to introduce our new code of conduct that will drive our commitment to act with integrity every day. This Code of Conduct sets the principles of our daily ethical behaviours and describes how we interact with external parties, conduct business, fight corruption and protect our Group reputation.

We, as Leasys Group workforce members, are coming from various countries with different cultures and professional backgrounds. This is our personal pride and our common strength. Our commitment towards a diverse and inclusive workplace ensures that we value everyone's contribution to the success of Leasys.

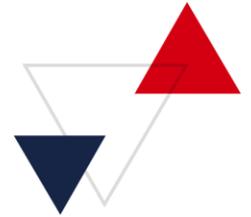
With integrity, we ensure compliance with the laws, regulations and best practices that help us offer high quality services to our customers. Integrity is a source of competitiveness, a foundation of our sustainable growth and the way to build day after day our reputation as a Company that our customers, workforce and stakeholders can trust and rely on.

The code is designed to guide each of our actions, decisions and behaviours on a daily basis. If you see anything that you think may be a violation of the Code, it is your responsibility to speak up to support the highest levels of integrity and ethical behaviour. We are all individually and collectively the guardians of our Company's reputation and ability to operate for its sustainability.

I rely on each one of you to make the commitment to act with integrity every day and follow the Code.

Rolando D'Arco  
Chief Executive Officer

**Signature**



## Why Do We Have a Code Of Conduct?

Welcome to our Code of Conduct. At Leasys integrity is essential to our business. Our Code of Conduct expresses this vision to our employees, business partners and all other stakeholders. The Code reflects the core values to inspire us to do the right thing in all circumstances.

As a Leasys Group workforce member, the communities in which we conduct our business operations are all affected by our actions, and benefit when we do the right thing. Without guiding principles, it is not easy to always know how to identify the right path to take, or, when we identify it, to follow it. That is why we need guiding principles.

At Leasys Group, one way we develop an environment that embodies the highest ethical standards in business conduct is through our Code of Conduct (the “**Code**”).

The Code aims to ensure that all members of Leasys Group’s workforce act with the highest level of integrity, comply with applicable laws, and build a better future for our Company and the communities in which we do business. Leasys Group endorses the Universal Declaration of Human Rights published by the United Nations (“**UN**”), the International Labour Organisation’s (“**ILO**”) Conventions and the Organisation for Economic Co-Operation and Development’s (“**OECD**”) Guidelines for Multinational Companies. Accordingly, the Code is intended to be consistent with such guidelines.

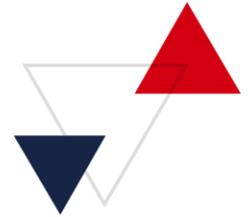
The Code is approved by the Board of Directors of Leasys S.a.s.. The Code applies to Leasys S.a.s. and its subsidiaries which are collectively defined as “Leasys Group” and applies to Leasys Group’s worldwide workforce.

Although no document can possibly take into account all the particular ethical and legal dilemmas that you may encounter in the course of your work, the Code provides guidance that is meant to keep you on the right course, and to alert you when further guidance for individual situations may be necessary.

Neither the Code nor any of the Principles, Policies or Procedures are intended to, and do not create any contractual rights enforceable against Leasys Group by any workforce member, shareholder, customer, supplier or other third party. They help each of us to know what is expected of us as workforce members to make sure we act knowingly and with integrity.

## Who Does It Apply To?

The Code applies to all board members and officers of Leasys S.a.s and its subsidiaries, as well as full-time and part-time employees of the Leasys Group and all its subsidiaries. The Code also applies to all contracts and all other individuals and companies that act on behalf of Leasys Group, wherever they are located in the world. We refer to this group collectively as our “workforce.”



Leasys Group has a global workforce located in many countries with varying legal requirements. In addition, some of our contract personnel may be governed by additional policies of their direct employer. While we recognise the diversity and complexity of the rules that apply to our workforce's conduct, we do not expect that the Code will conflict with the expectations inherent in such rules.

Leasys Group shall use its best efforts to ensure that the Code is regarded as a best practice of business conduct and observed by those third parties with whom it maintains business relationships of a lasting nature such as suppliers, dealers, advisors and agents.

## **What are our Individual Responsibilities under the Code?**

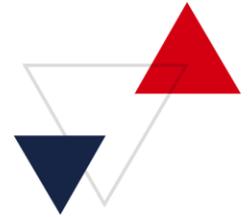
We expect our workforce to understand and adhere to the principles and requirements set forth in this Code in any setting that may affect the Company, either at work or after hours. This could include, for example, conduct on social media.

Whenever and wherever you are working on behalf of the Leasys Group, or are interacting with others within Leasys Group's community, you must abide by the Code. All workforce members must be aware that, with their behaviour, they represent Leasys Group, even outside of work if the activity involves representing Leasys Group, to the extent allowed by local law. Your conduct affects both the external reputation of the Company and its internal culture.

We seek to create a workplace that promotes values, that adheres to and rewards ethical conduct as practised by all members of our workforce, resulting in a cooperative working environment in which the dignity of each individual is respected. We expect that you will always adhere to every aspect of the Code, as well as to applicable laws and regulations. All workforce members are expected to treat others as they themselves expect to be treated, including customers and other external persons doing business with the Company.

All workforce members and others providing services to the Company have the responsibility to maintain corporate property and records in accordance with the applicable Principle, Policy or Procedure. All workforce members and others providing services to the Company are required to cooperate with investigation requests by providing accurate, timely and factual information. We expect that you will be completely forthcoming and honest in such a situation.

You may be periodically required to certify your understanding of, and adherence to, the Code or any specific Principle, Policy or Procedure.



## **How does the Code Fit with the Law?**

Conducting Leasys Group's business in full compliance with applicable laws and regulations is a key pillar of the Code. The applicable legal framework reflects the expectations of the communities in which we do business. Failure to comply with laws or regulations can have a severe negative financial and/or reputational impact on our Company. Non-compliance can also have potential serious repercussions, even criminal ones, for the individuals involved. For these reasons, our Principles, Policies, and Procedures, as applicable, place great emphasis on how to comply with the laws that govern our business. The Code is a critical component of Leasys Group's ethics and compliance program for assuring effective prevention and detection of violations of law and regulations applicable to its activities.

Obviously, our operations are subject to the laws of many different countries, and we each have an affirmative obligation to comply with the laws of the region where we perform our work. If the Code and local law are consistent with each other, you are expected to comply with both. However, where laws and regulations in a particular jurisdiction are more lenient than those contained in this Code, the Code shall prevail.

## **What Conduct May Be Subject To Discipline?**

We expect our workforce to do the right thing and comply with the Code. Where we confirm a violation of the Code, we will take steps to apply the appropriate disciplinary measures that could include termination of employment or business relationships.

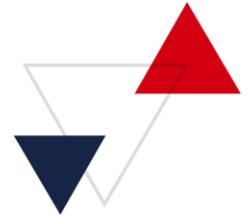
If you are not sure about what your compliance obligations may be in a particular situation, contact your direct supervisor, Human Resources, Compliance Departments, or ask your question through the whistle-blower line. Preventive guidance could protect you and the Company.

Any exceptions to what is prescribed by the Code, including partial exceptions and exceptions limited in time and nature may only be authorised serious and justified reasons. Waivers of this Code for Directors, Executive Officers or any employee of Leasys Group may be made only by the Board of Directors of Leasys S.a.s. or a committee of the Board of Directors of Leasys S.a.s. and will be disclosed and archived as required by applicable laws and regulations.

## **Objectives and How to Interpret the Code**

The Code of Conduct has been drawn up to guide us in our actions and help us make decisions in accordance with the Group's ethical rules and values and with legislation.

Our integrity system sets the foundation for the corporate governance of Leasys Group, and includes a critical framework of Principles, Policies and Procedures that combine our corporate experience, up-to-date research of applicable legal requirements and best practices as well as benchmarking on corporate



ethics and compliance. The various topics are classified into four sections: relations with customers and suppliers; social, environmental and societal issues; anti-corruption; protection and reputation of the Group. In order to provide further information, some practical cases have been cited to illustrate, using specific examples, the principles presented in the Code.

Given the complexity and fast pace in today's workplace, you may encounter situations that appear unethical. Familiarity with the Code is crucial as it can help guide your actions when you face such situations.

Although the Code contains an overview of important conduct and examples, you may experience a particular factual situation for which you believe the Code's guidance is not sufficiently clear or applicable. To help you determine what actions are required, ask yourself the following questions:

## **7 Questions to ask to ensure ethical behaviour**

**Is the activity legal?**

**Is the activity or conduct within the letter and spirit of the Code?**

**Is it in the interest of our customers and stakeholders?**

**Have I taken into account the risks involved and what the consequences of my decision could be?**

**Does it make me feel uncomfortable?**

**Could it appear inappropriate?**

**How would I feel if I did nothing at all?**

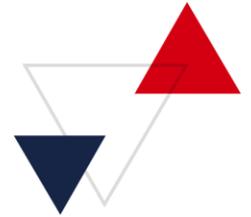
One key rule to remember: whenever you notice or suspect an inappropriate act or form of behaviour, or when you feel under pressure, you must immediately talk about it with your manager.

Ethics violations are sometimes less obvious than we might expect. It may not be clear how the Code applies to a particular or unusual situation. Sometimes the Code is clear, but its requirements defy the common culture in the region where we live. For specific advice on how to apply the Code in your country, you should refer to the contact your Human Resources and Compliance Departments.

## **Manager Roles and Expectations**

*Manager refers to any individual responsible for leading, managing or supervising a workforce member. In addition to the aforementioned responsibilities, Managers also need to:*

### **Serve As a Role Model**



As a Manager, our expectation is that you model ethical behaviour to your team members at all times and that you consistently hold ethical standards and integrity above business needs or results. We also expect that you support your team in understanding and adhering to the spirit of the Code, ensuring that each member has the time for and can successfully complete required training. Your failure to adequately supervise may also be a violation of the Code. In certain circumstances, failure to fulfil these responsibilities may also lead to disciplinary actions and legal proceedings towards the Manager.

## **Create a Safe and Supportive Work Environment for Reporting**

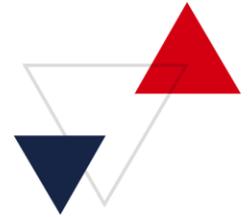
We expect all Leasys Group Managers to provide an environment where people feel comfortable and supported in discussing their concerns. As a Manager, there may be situations that require you to shift priorities in order to create the time for people to openly and safely discuss their concerns. During those conversations, it is important that you assure those you supervise that you will listen objectively and attentively to their issues. If a member of your team chooses to share their concerns with another leader in the Company, Compliance, Human Resources Department, it is best that you honour that choice.

Oftentimes, people are fearful that openly reporting ethical misconduct may in some way jeopardise their own careers or result in some form of retaliation. As their role model and leader, you need to reassure them that *there will be absolutely no tolerance for retaliation in any form against a person who reports a concern in good faith*, and encourage the individual to report any suspected examples of retaliation, should they occur. Likewise, if an action is being taken against someone whose conduct violates the Code, the manager advises against speculation about who reported the infringement and any retaliation towards the person believed to have reported the incident. Should one of your team members report ethical misconduct, we expect that you will continue to treat that individual with respect and fairness.

Managers have the responsibility to create an environment where members of their teams are welcome to raise their concerns (Whistleblowing). Managers are also expected to oversee the conduct of employees under their supervision, ensure that our Code of Conduct is applied consistently, and guarantee that whistleblowers will not be retaliated against in any way.

## **Know How and When to Handle Concerns**

If you are approached about a situation involving ethical misconduct, we expect that you will take immediate steps to address the issue. It is important that you understand the essence of the Code and are able to comfortably respond to day-to-day questions. If you are asked to interpret or apply the Code or any of the related laws or regulations, and you are uncertain how to respond, immediately address the matter by reporting to the Compliance or Human Resources Department. Under no circumstances should you independently investigate suspected or known violations of the Code.



## **When to Report Code Violations and What Happens Next**

### **Reports of Illegal or Unethical Conduct Will Be Investigated**

At Leasys Group, it is our commitment to conduct due diligence and investigate all the concerns expressed by our workforce. Information concerning allegations of wrongdoing will be evaluated by appropriate management personnel. Every expression of concern will be investigated as appropriate with trained investigators, or subject matter experts. If wrongdoing is uncovered, appropriate corrective actions will be taken regardless of the level or position of the individual(s) involved. All cases will be tracked until their final resolution.

### **Confidentiality Is Paramount**

Unless not allowed by local law, reports or inquiries may be made on an anonymous basis. However, it is helpful if you provide your name and contact information, so you can be reached for further details and follow-up information. All information provided and the identity of the individual making the report will only be shared on a “need-to-know” basis with those who are responsible for assessing and investigating the situation and empowered to undertake corrective action.

Even if you choose to remain anonymous, you are required under the Code, unless local law provides otherwise, to report suspected illegal or unethical behaviour.

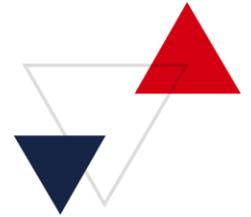
### **Retaliation Will Not Be Tolerated**

We take our commitment to our Code very seriously. Retaliation against any individual who raises an issue in good faith regarding a possible violation of the Code will not be tolerated. Our Code expressly prohibits any member of our Company to retaliate against or discriminate the others as the result of a report or participation in an investigation. Anyone who retaliates against such an individual will be subject to disciplinary action up to and including discharge. No individual may be demoted, terminated, suspended, threatened, harassed, coerced or intimidated as a result of reporting, in good faith, unethical behaviour or due to the participation in an investigation of a matter reported under the Code.

If you feel you or anyone you know is being potentially retaliated against in any way for reporting a violation or participating in an investigation, please speak up. We need your participation to ensure that our Company remains free of retaliation.

## **How is the Code Changed?**

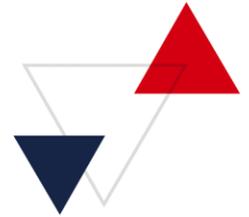
The Code is subject to review by Leasys S.a.s. Board of Directors. Reviews take into account, among other things, the comments and suggestions received from Directors, members of our workforce and from third parties, changes in law or best practices, as well as experience acquired in applying the Code itself. Any modifications introduced in the Code as a result of this review activity are promptly published and made available in accordance with applicable laws and regulations.



Compliance is responsible for implementing, monitoring and updating the Code of Conduct with the support of Human Resources and of the other competent departments.

## **How Is The Code Of Conduct Made Available?**

The Code of Conduct is a document that is made public and shared with stakeholders. It is available on the website of Leasys Group.



## PRINCIPLES

### CUSTOMERS AND SUPPLIERS RELATIONS

#### 1. RELATIONS WITH CUSTOMERS

##### Definition

Leasys Group places the trust and satisfaction of its customers and mutual shareholders at the heart of its actions. Leasys Group wants all of its employees to be involved in this relationship, bearing in mind that the interest of the customer is the priority in all actions carried out by its employees, including those who exercise a support function for the Group.

##### Details

To ensure that customer expectations are met, satisfaction surveys are conducted for all markets. Customer complaints are handled internally, with a view to continually improve our services and strive for excellence in our customer relationships. Training is regularly provided to employees whether or not they are in direct relation with customers.

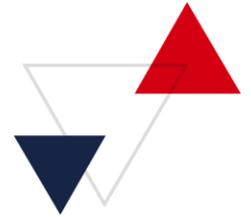
##### The commitment of Leasys Group

All employees are expected to observe high-level standards of professional and business conduct and encourage others to do the same. They shall act in integrity with Group values, the applicable laws, the industry's professional standards and internal regulations. They have to be able to demonstrate competence, diligence, respect and ethical manner in their relationship with Leasys Group's customers. They shall avoid any misconduct and shall protect Leasys Group's reputation and business sustainability. Moreover, they shall support the customer's needs using digital tools and applications available to the Group, in order to create value for the clients, putting the customers' satisfaction first. All employees, in day-by-day activities, shall observe the following statement according with their own responsibility and job:

##### - Fair dealing and miss-selling

Engagements with the customers, marketing and sales documentation should always be based on values of fairness and transparency.

Recipients shall not execute incorrect sale of products or services in circumstances where the contract is unclear, or the product / service is not suitable for the customer's needs.



## - **Customer's needs**

Employees shall take proper actions to understand the customer's needs and expectations. They shall make reasonable effort to support the customers in finding an advantageous solution for both parts.

Employees cannot use customer or other external information acquired in the course of their working activity for executing personal dealings or obtaining any personal benefit despite of the customer's needs / expectation.

## - **Customer's complaints**

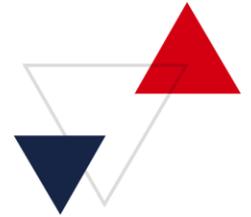
Employees should address and investigate customers' complaints in order to guarantee that customers' needs are heard, filtered through the Organisation, and that are addressed in future product and processes definition, marketing, sales and advice.

## - **Product governance**

Product design, marketing, sales and advice should be driven by concerns about what the customer needs and what is most suitable for these needs combining with sales mindset. Post sales customer care should ensure customers' satisfaction or ongoing product suitability rather than focus the attention on commercial guidelines only.

### **What should I do?**

- Listen to your customers and take their interests into account in every action you propose;
- Get to know your customers better, while respecting their right to privacy, so that you can advise and support them appropriately;
- Always provide customers with clear, accurate, and complete information that is not misleading;
- Be vigilant to prevent all forms of fraud in order to protect customers, and fight against money laundering, the financing of terrorism, corruption, etc.;
- Report any malfunction or situation that could lead to a conflict of interests to your manager;
- Apply economic conditions to clients which are in line with those advertised;
- During the selling process, provide the client with all the documentation required by transparency and consumer code regulations.



## **What shouldn't I do?**

- Place your personal interests or those of Leasys Group before those of our customers;
- Facilitate, encourage or assist customers in any actions intended to infringe laws and regulations;
- Propose a product that has not yet been authorised by the Company;
- Provide information related to Leasys' products to clients in a format which is not compliant with regulatory requirements.

## **Example**

*I want to modify the content of communication materials on our products, which are given to customers. What precautions should I take?*

Before distributing any support to the customer, you must verify that the document has been validated by the Legal Department beforehand.

## **2. PERSONAL DATA**

### **Definition**

Personal data are defined by Regulators as any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Customers', suppliers', leads', prospects' and any other third party's personal data are expected to be handled with care by employees.

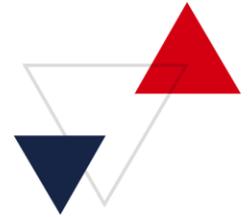
This Code provides a reference framework for the employees who process this type of data. It is a reminder of the commitments made by the Group as well as the best practices to be observed.

### **The commitment of Leasys Group**

Leasys Group has taken a stand on the sensitive issue of personal data by committing to act in an ethical and responsible manner, and adopting a transparent and instructive approach when dealing with its customers, suppliers and other third parties.

## **What should I do?**

- Involve data protection experts at the beginning of projects to ensure compliance with all regulations on the protection of personal data;



- In the same way, involve IT security experts and representatives in the project;
- When necessary, obtain from individuals appropriate consent for the processing of personal data;
- Only processing personal data for the specific business purposes for which they have been collected;
- Informing customers and other third parties about the purposes for which their personal data are collected and processed and about the identity of the responsible for their treatment;
- Ensure the project is in keeping with the principles of the Code: security, integrity and reliability, ethics, transparency and education, etc.;
- Make sure that data subjects' right is appropriately respected;
- Participate to trainings on data protection organised by the Group;
- If in doubt, always contact your project's data-processing expert or the Data Protection Officer (DPO).

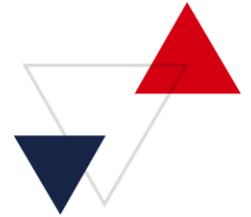
### **What shouldn't I do?**

- Propose a project that involves processing personal data without having verified the compliance of your project with the personal Data Protection Officer (DPO);
- Make any use whatsoever of personal data that does not respect the key principles indicated in the Code;
- Process any personal data for unintended purposes or without the customer's prior knowledge and consent;
- Fail to comply with the rules and recommendations put in place within the Group to ensure personal data security and confidentiality, particularly by giving unauthorised persons access to this data.

### **Example**

*I collected the personal data of my customers and then declared the processing and the results thereof to the competent Authorities before the General Data Protection Regulation (GDPR) was put in place. At the time, we had already received the competent Authority's approval. Can I still use these data?*

Under the new regulations which went into force in May 2018, you may use or process such personal data in accordance with the declaration you made. However, the new regulation requires that companies



keep a register of all data processing operations. You must record the characteristics of the *competent Authority's* approved data processing operation in this register.

*I want to build up my customer database with public information (such as profiles published on the social networks). This would enable me to carry out more in-depth analyses and gain greater insight into their private lives. Do I have the right to do this?*

Although these data have been made public, you need your customers' consent to use them. You must also take into consideration the fact that this information is sourced from the social networks and is not necessarily reliable; nevertheless, from the customers' point of view this information is sensitive. Ask for advice from the Data Protection Officer (DPO) or from our experts in the Legal Department, Compliance and/or Information & Communication Technology Departments.

### **3. FAIR AND EQUITABLE CHOICE OF SUPPLIERS**

#### **Definition**

Choosing a supplier in an equitable and fair manner above all requires ensuring that all services providers receive the same treatment.

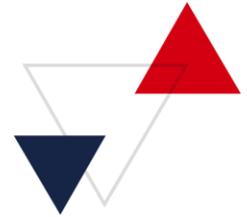
#### **Details**

The equitable choice of suppliers must be made as a result of a fair competition between all the participating companies. This choice must be based on objective elements that notably include the respect for human rights and fundamental freedoms.

#### **The commitment of Leasys Group**

We believe that a clear and transparent attitude contributes to maintain enduring relationships with our suppliers. We are convinced that integrity is a fundamental premise of these relationships. Therefore:

- our choice is based on clear and verified criteria made through an objective and transparent procedure;
- we are faithful to Company policies that base relationships on maximum honesty, especially in the management and in conclusion of contracts, by avoiding situations of conflict of interest, even potential ones;
- in the specific case of professional consultancy, we base our decisions on professional and competence criteria and avoid conflicts of interest, even potential ones.
- For this choice to be fair, all companies must receive the same treatment from the buyer(s), the decision-maker(s) and/or any other employee of Leasys which would be affected, and the choice



must be based on objective elements. This implies that buyers, decision-makers and/or any other employee of Leasys adopt a responsible and fair attitude to the bidding companies throughout the duration of the call for tender. Consequently, taking purely individual interests into consideration in selecting the chosen firm must be avoided.

## **What should I do?**

- Report any potential risk of conflict of interests (for example, the existence of a family member working in one of the bidding companies in calls for tenders, etc.);
- make sure that all respondent companies receive a response within a sufficient and identical time frame; to ensure this, distribute the call for tender dossiers after all the bidding companies have been identified and do not add any more companies to the list once the call for tender has been launched;
- ensure that all bidding companies interviewed receive the same initial and modified information, data and documentary materials (tender documents, specifications, technical documents, functional documents, etc.);
- in the event of oral interviews, ensure that all the bidding companies are invited to one or more sessions, the duration of which must be identical for each Company interviewed.

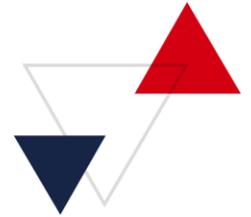
## **What shouldn't I do?**

- During calls for tenders or contractual negotiations, provide information only to some of the companies approached;
- accept any invitations, gifts or benefits in kind from one or more of the bidding companies during the call for tender or the contractual negotiations;
- give any of the bidding companies an indication of the content of the bids or the level of response of the other companies participating in the call for tenders;
- change the selection criteria, and/ or the ranking weighting, after the date of receipt of the replies to the call for tenders.

## **Example**

*I heard that during negotiating periods, no gifts may be accepted. Is that right?*

Indeed, all gifts (even of an advertising nature) and invitations must automatically be refused. In absolute terms, this means that you must not accept any benefits in kind since this could distort your judgement when selecting your supplier.



*I contacted and met with a Company that meets my needs perfectly. It even came up with some additional proposals. I decided to forward the details of the Company to our Procurement Department so that it could become included in the list of companies to be interviewed in the context of a call for tenders. Is this the right approach?*

First of all, you have to summarise what you need, then draft a specification note. A potential supplier cannot do this since they may be inclined to propose their solution, tools or services that would not necessarily correspond to your needs. You must draw up, with the help of your Procurement Department, the list of companies to be interviewed, and be supported by a buyer of Procurement throughout the interviewing process (and subsequent post-interview phases), in order to find the supplier that best suits your needs.

#### **4. RESPONSIBLE RELATIONS WITH SUPPLIERS**

##### **Definition**

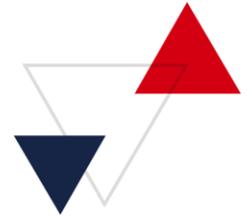
Reasonable due diligence is necessary to ensure that all players in the supply chain act in accordance with a certain number of commitments and principles, notably concerning the respect of human rights and fundamental freedoms, workplace regulations, the fight against all forms of discrimination, the promotion of diversity as well as the protection of the environment and business ethics. If a player in the supply chain fails to act in accordance with these commitments and principles, the Group's performance, reputation and image could be seriously affected.

##### **The commitment of Leasys Group**

Leasys Group must ensure that its procurement of goods, services and resources aligns with its business objectives and processes, including increasing shareholder value, maintaining the highest standards of quality, and taking care of our people and the communities in which we do business.

The commitments and principles of Leasys Group include:

- financial equality: remunerating suppliers in accordance with applicable laws and regulations;
- equal treatment;
- transparency of our processes;
- promoting sustainable relations;
- preventing corruption by adhering to rules known to suppliers;



- conducting a comprehensive cost analysis of all costs incurred over the lifetime of the goods or services.

### **What should I do?**

- Behave honestly in dealings with suppliers so as to forge a bond of trust, whether the relationship is one-off or long-term;
- involve a buyer who is positioned sufficiently upstream in order to guarantee the entire purchasing process and manage risks, particularly at the legal, financial and operational level;
- leave it to the buyer to inform the companies (bidders) that have not been selected as a result of the call for tender and to provide objective criteria justifying this decision;
- compare the offers submitted by the suppliers interviewed, on all of the bidding criteria, by factoring in the overall cost;
- respect a sufficient turnaround time in the event of a change of a supplier, in order to give a viable and acceptable withdrawal period.

### **What shouldn't I do?**

- During informal or formal exchanges with a supplier, disclose and, in particular, provide information on Leasys Group's strategy and any other sensitive data that would not be publicly available;
- fail to analyse or take into account all the criteria that could lead to the economic dependence of the supplier upon his selection, and throughout the bank's relationship with him;
- terminate a contract without respecting the notice period set in the contract.

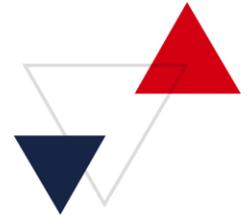
### **Example**

*I want to launch a call for tenders and I have five days to choose a supplier: is this possible?*

Suppliers need a minimum time to respond. This is notably required with respect to our suppliers or to ensure that supplier responses are relevant and complete.

*I want to work with a supplier with whom I am entirely satisfied. I have been working with this supplier for 10 years now and almost all of his sales are generated with Leasys Group. Is there a risk?*

The buyer will obtain information about the supplier, concerning its economic dependence, and will propose alternative solutions. Should the service come to an abrupt halt, the risk incurred could be financial, operational and/or legal, including respecting the notice period required for contractual termination.



## 5. COMPETITION

### Definition

Competition law consists of a set of rules applicable to both private and public enterprises operating in different markets. Its purpose is to maintain the principle of free and fair competition and to ensure consumer protection.

### Details

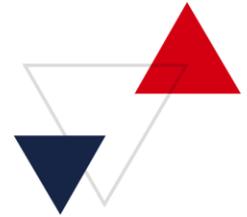
Many types of behaviours, such as cartels and abuse of dominance, can jeopardise free competition. A cartel is an agreement, concerted behavior, or a planned and intentional collaboration between companies whose purpose or effect, even potentially, is to coordinate their behaviour in order to limit competition. An agreement with a Company, be it a competitor or not, may take the form of an oral, written, formal or informal agreement (during a business lunch, or at a trade association event, etc.). In addition to the most serious forms of cartel agreements (such as the joint fixing of sales prices or commercial conditions), the distribution of customers or markets, coordination of tenders or a decision to boycott a particular customer or supplier, also constitute a cartel. Abuse of a dominant position concerns companies in a position to act unilaterally in a given market: pricing policies aimed at eliminating competitors or commercial foreclosure strategies and discriminatory practices, etc.

### The commitment of Leasys Group

Leasys Group recognises the value of competition as an integral part of the Company's culture and the continuous and strong commitment to its respect. All activities must be carried out in compliance with competition law and internal policies, the basic principle being that companies operating in a market must determine their strategy in an autonomous manner.

Agreements with competitors and sharing of sensitive information are therefore strictly prohibited. Sensitive information is non-public data that is strategically useful (information on prices and trends, list of customers, market capacity and distribution methods, strategy and costs, etc.). It is however possible to exchange certain information as soon as these are made public and in accordance with Leasys policies. Leasys Group and its directors, officers, and other employees will work vigilantly to avoid any business practices that may represent an antitrust violation. Within the framework of fair competition, Leasys Group shall not knowingly infringe any third party's intellectual property rights.

The legal consequences of noncompliance with such laws can be severe. Companies whose market behaviour fails to comply with competition rules and individuals who are found responsible for infringements may be subject to severe sanctions, including imprisonment for individuals. Violations of this principle are grounds for disciplinary actions, up to and including termination of employment.



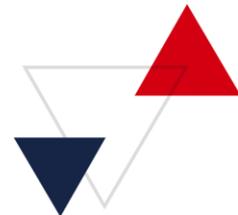
In addition, compliance with competition laws is crucial to the Group's reputation.

### **What should I do?**

- Avoid addressing sensitive issues when interacting with third parties outside the Group, regardless of the context;
- if such topics are brought up, put an end to the conversation and immediately notify your manager and the Legal Department;
- if in doubt about the degree of sensitivity of the information, check with your Legal manager before undertaking discussions with a competitor or trade association (including checks on the adoption of an antitrust code of conduct by such associations);
- in the context of formal and necessary relations with competitors, clearly indicate the purpose of the exchange, limit the discussion strictly to its purpose and keep a written record;
- return any commercially sensitive information you receive, without keeping copies, and explain in writing that you do not wish to obtain such information;
- contact the Legal Department before entering into any agreement that is likely to have a significant competitive effect on the market concerned.

### **What shouldn't I do?**

- Consult with a competitor or exchange information with them on the prices services or on customer prices;
- conclude any customer, territory or market sharing agreements with competitors;
- boycott certain customers or suppliers;
- don't discuss or exchange individualised information with third parties relating to commercially sensitive topics for both Leasys Group and its industrial partners, such as current or future commissions and fees, prices, pricing methods, special offers, contractual terms for customers, profit margins, capacity, production output, inventory, sales, market shares, costs, business or marketing plans, bids, individual customers;
- never discuss with third parties any tender offer terms, such as prices, sales conditions, etc., and/or your participation or withdrawal from a tender;
- negotiate clauses such as those limiting the commercial freedom of trading partners without seeking advice from the Legal Department.

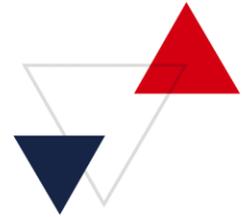


## **Example**

*I am to attend a meeting or participate in discussions as a representative of Leasys Group within a trade association. Which topics do I have the right to discuss and what provisions should I take?*

You can discuss various topics with competitors, provided that these do not relate to subjects deemed sensitive.

Remember that attending a meeting (even passively) where the topic could be qualified as anti-competitive may be considered as membership to a cartel. Before attending any such meetings, make sure there is an agenda. In the event of non-compliance with competition rules and Leasys policies, leave the meeting and request that your departure be noted in the minutes. Do not hesitate to seek help from the Legal Department to find out what attitude should be adopted before, during and after such meetings.



## **SOCIAL, ENVIRONMENTAL AND SOCIETAL ISSUES**

### **6. PROTECTION OF EMPLOYEES' DATA**

#### **Definition**

Everyone has the right to have their privacy respected. Personal data may only be collected, processed and stored for specific and legitimate purposes. This information must be brought to the attention of all employees.

#### **Details**

The use of personal data is strictly controlled:

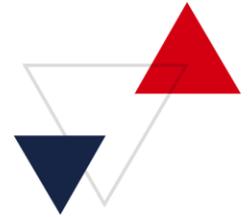
- only data that is relevant and necessary with regard to the targeted objectives, which must have been clearly defined in advance, should be processed;
- personal data must not be stored for an unlimited period of time; the necessary measures must be taken to guarantee data confidentiality and to avoid any communication to unauthorised third parties;
- everyone must be informed about the processing of any of their personal data. They also have the right to access and modify their information, and may oppose the processing thereof for legitimate reasons. The destruction, loss, alteration, disclosure or unauthorised access to personal data may infringe upon the rights of individuals, as well as the individual and collective liberties of employees. Internal rules and procedures must therefore be respected.

#### **The commitment of Leasys Group**

In a context where people are being increasingly required to communicate their personal data in paperless form, Leasys Group places importance to integrity, reliability, ethics and transparency over the use of personal data. As an employer, Leasys Group guarantees its employees the protection of their personal data and respect for their privacy.

#### **What should I do?**

- Ensure the appropriateness and relevance of the information collected;
- ensure that the way personal data is used is entered in the personal data processing register, in accordance with internal procedures;
- inform our employees on how the personal data they have given us is used;
- guarantee employees' right to their privacy notably by not transmitting their information to unauthorised persons and ensuring personal data are kept securely;



- request that all inaccurate or incomplete data is completed or removed;
- respect the Information Security prescriptions to guarantee the safety of personal data;
- in case of data breach, timely inform the internal referent (e.g. DPO);
- in the event of subcontracting, ensure that services providers respect these same principles.

### **What shouldn't I do?**

- Collect personal information that does not match a specific and necessary use;
- communicate people's personal data to any unauthorised third parties, whether internal or external, without their express consent;
- retain personal data beyond the data retention period.

### **Example**

*As part of my duties, I have access to the personal data of all employees in my area of management. I didn't have enough time to finish my file tonight and copied the information onto my USB key so that I could make some headway on my way home. Unfortunately, on the train, someone stole my laptop with my USB key in it. Should I notify someone?*

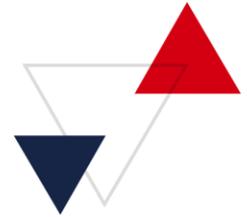
It is imperative you report this theft to your manager as well as to the other competent figures (e.g. ICT and Data Protection Officer) of Leasys Group. Moreover, you need to report the theft to the police as it happened outside the Company's premises. Not only is there business information on your computer, but you also have copied personal data. The loss of this USB key could have serious consequences and cause significant damage, both on the Company and the employees. Never copy any personal data whether onto your computer or external devices, particularly when these data are not encrypted. To ensure the security of personal data, it is essential to respect the internal rules and procedures.

## **7. HEALTH, SAFE AND FAIR WORKPLACE**

### **Definition**

Companies must take the necessary steps to ensure safety and protect the physical and mental health of their employees. These measures notably include implementing a strategy to prevent occupational risks as well as carrying out information campaigns and training sessions.

### **The commitment of Leasys Group**



Everyone working for or with Leasys Group must be able to achieve their full potential in a safe and secure environment. Leasys Group undertakes to take all necessary measures to ensure safety and protect the physical and mental health of its employees. However, safety in the workplace also depends on all of us. All Company's employees must take care, in accordance with their training and the best of their abilities, of their own safety and health and that of the other persons concerned by their acts or omissions at work.

Leasys Group believes in and actively promotes a culture of accident prevention and risk awareness among workers, in particular through the provision of adequate training and information. We expect that members of our workforce will share that commitment with us and promote awareness of compliance with all health and safety guidelines along with the preventive measures established by Leasys Group for the protection of their health and safety.

### **What should I do?**

- Become acquainted with, and respect Leasys Group's health and safety rules;
- make sure that your actions and conduct do not represent a risk for you or other people;
- contribute to safety and security in the workplace. This includes participating in safety drills and training programmes organised by the Company and reporting any situation that could constitute a risk to security and safety in the workplace to the Human Resources Department.

### **What shouldn't I do?**

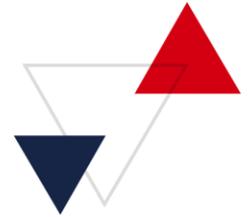
- Ignore Leasys Group's rules on health and safety at work;
- ignore any situation that could compromise the safety and security of our working environment.

### **Examples**

*I have noticed a change in behavior of a colleague of mine: he seems very stressed, isolates himself, has lunched alone for some time and refuses to discuss anything. It worries me but I don't know what I can do.*

This situation troubles you. It is important you share this information with your manager or Human Resources Department, so that they can intervene rapidly, in the interest and for the good of the person concerned.

*During the last fire drill, I realised that the two people responsible for evacuating my unit were both absent; one colleague didn't know what to do. Should I notify someone?*



During the drill, you noticed a glitch in the drill procedure that could have compromised the safety of a colleague. You must inform the security officer in writing, so that she or he can rectify the situation and take the necessary measures to ensure the security of all persons on the site.

## 8. NON-DISCRIMINATION

### Definition

Discrimination is a form of unequal treatment that is based on a prohibited criterion and falls within the area covered by legislation. In specific terms, discrimination is the act of distinguishing someone on the basis of a set of criteria or distinctive characters.

### Details

Laws on discrimination define discrimination according to various criteria such as:

- origin;
- gender;
- family situation;
- pregnancy;
- physical appearance;
- the particular vulnerability of a person resulting from his / her socio-economic situation which is clear or known to the author;
- surname;
- address;
- bank information;
- state of health;
- loss of autonomy;
- disability;
- genetic characteristics;
- morals;
- sexual orientation;



- gender identity;
- age;
- political opinion;
- trade union or cooperative activities;
- the ability to express oneself in a language other than the local language
- actual or alleged membership or non-membership to an ethnic group, a nation or an alleged race;
- religious convictions.

**According to law, discrimination may be direct:** “the situation in which ... a person is treated less favorably than another is, has been or would have been treated in a comparable situation”.

**or**

**indirect:** “An apparently neutral provision, criterion or practice that may, for one of the reasons mentioned in the first paragraph, be of particular disadvantage to persons in relation to other persons, unless that provision, criterion or practice is objectively justified by a legitimate aim and that the means to achieve that end are necessary and appropriate”.

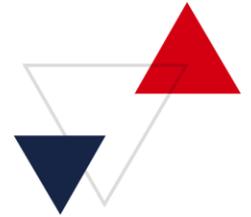
### **The commitment of Leasys Group**

Leasys Group is committed to raise the awareness of its executives, managers and employees about issues of non-discrimination. To act in favour of gender equality and diversity means allowing employees to feel they are treated fairly from the moment they join the Company, and throughout their career in the Company. A working environment in which everyone feels respected regardless of their unique character enhances performance and drives motivation.

#### **What should I do?**

- Reject all forms of discrimination against employees, customers, suppliers, services providers and other persons having relations with Leasys Group;
- do not accept any practice or behaviour that would or could be discriminatory against employees, suppliers, customers, etc. Help, talk about it and if necessary, consult your manager and HR Department;
- if you are a manager, be careful to base your decisions on objective criteria and do not have any prejudices.

#### **What shouldn't I do?**



- Treat people differently on the basis of criteria prohibited by law, which places them at a disadvantage compared to others;
- contribute to create a hostile climate that is conducive to discrimination.

## **Example**

*An employee tells me that he/she wants to take a day off to celebrate a religious holiday that does not fall on a public holiday. Can I grant him/her the day off?*

There is no reason to take a day off for a religious holiday other than those falling on public holidays. Leave dates must be decided with the manager and take into account the proper functioning of the service in question. If necessary, you must be able to justify your refusal to accept a request for leave objectively.

## **9. DIVERSITY AND GENDER EQUALITY**

### **Definition**

Companies must comply with obligations regarding gender equality and the employment of people with disabilities.

### **Details**

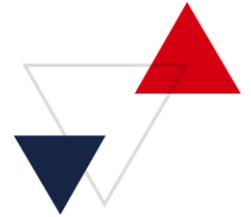
Respecting people despite the differences in gender, age, ethnic origin, religion, sexual orientation and identity, language or disability is an obligation for every Company. Behaviours such as avoiding discrimination on the basis of nationality, religion or sex, ensuring the equality between women and men in the workplace, and promoting the integration of the disabled people, allow to be compliant with the international ethical standards.

### **The commitment of Leasys Group**

In addition to its legal obligations, Leasys Group considers that diversity is a factor that enhances performance and attractiveness. Promoting gender diversity is about creating an open and responsible corporate culture that fosters internal cohesion and progress. Teams with diverse profiles and talents reflect the Company and enable us to invent new models, better meet the expectations of our customers, and, as such, benefit everyone. This commitment is reflected in concrete actions, such as promoting women to positions with managerial responsibility and within the management committees or integrating people with disabilities.

### **What should I do?**

- Be attentive to make an objective judgement focused on skills in all managerial decisions;



- obtain several different opinions to foster objectivity;
- ensure that your teams are made up of a balanced proportion of women and men.

### **What shouldn't I do?**

- Make a decision on the basis of non-objective criteria;
- implement processes that could lead to unequal gender treatment or even discrimination, even though the purpose of these processes was initially intended to resolve inequalities.

### **Examples**

*Most of the people in my team are men. One of my staff is retiring in a few weeks and I'm thinking about replacing him with someone in the team. Should I focus on promoting a woman?*

Above all, base your judgement on the skills of everybody in your team and choose the person best suited to fulfil the duties of the job.

*I have received several applications for a vacant position on my team. After carrying out several interviews, the person whose skills are most in line with the job requirements is disabled. How will my team react?*

It is essential to remember that a person's skills are the only factor to be taken into account when recruiting. As a manager, if you have any concerns about the successful integration of this new employee into your team, do not hesitate to ask your Human Resources contacts.

## **10. THE FIGHT AGAINST HARASSMENT**

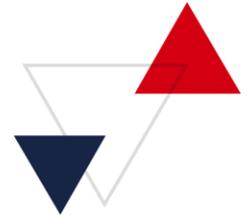
### **Definition**

The law punishes the harassment of others through repeated comments or behaviours, the purpose or effect of which is to cause a deterioration in working conditions, and which may infringe upon their rights and dignity, impair their physical or mental health, or compromise their professional future.

### **Details**

Moral harassment can take several forms:

- derogatory remarks;
- humiliation or bullying;
- insults.



Sexual harassment is the act of repeatedly making sexual comments towards or imposing behaviour of sexual nature on a person that undermines their dignity because of their degrading or humiliating nature or create an intimidating, hostile or offensive environment. Sexual harassment also covers the use, be it recurring or not, of any form of serious coercion for the purposes of obtaining an act of sexual nature, whether it is sought for the benefit of the perpetrator or for the benefit of a third party.

## **The commitment of Leasys Group**

Leasys Group is committed to ensure the prevention, detection and resolution of such acts which are offences that will be severely punished. No employee, trainee or intern can be sanctioned, dismissed or discriminated against for having suffered or refused to accept sexual harassment or acts of moral harassment or for testifying on such acts or disclosing them.

### **What should I do?**

- Be attentive to everyone around you, contact the Human Resources Department if you become aware of a case of harassment.
- Become acquainted with the Company's internal prevention and action policies and procedures.

### **What shouldn't I do?**

- Ignore a situation of harassment that you know about, whether you are the victim or a witness, irrespective of the reason or the alleged ramifications.

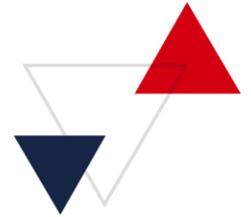
## **Examples**

*A colleague of mine is being repeatedly subject, in a humiliating way, to criticism of his/her work and being reproached in front of the rest of the team. His/her work is automatically being called into question and he/she is being reprimanded without any verification of the performance of his/her tasks. He/she is taking more and more time off for sick leave.*

Remind everyone that relationships in the workplace must be fair and respectful. If necessary, quickly get in touch with your manager or Human Resources contact so that they can take action rapidly to put an end to this situation of harassment.

*A colleague is particularly intimidating and humiliating. He/she frequently makes sexual innuendos towards me and makes inappropriate gestures. Despite my insistence that he/she stops this behaviour, he/she keeps pestering me for a date.*

Report this unacceptable behaviour quickly to your manager or Human Resources contact in order to alert them.



## 11. EXTRA-PROFESSIONAL ACTIVITIES

### Definition

An extra-professional activity is an activity that you undertake outside your working hours. The concept of pluri-activity can be defined as the simultaneous exercise by the same person of two or more activities of a professional, trade union or political nature.

### Details

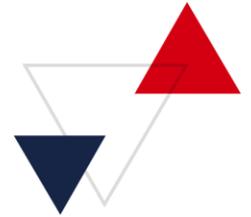
Having a salaried job does not prevent you from having an independent or self-employed activity at the same time. However, while the principle is the freedom to work, employees must respect a professional code of ethics with respect to their employers. Indeed, for the duration of their employment contract, employees are bound by an obligation of loyalty to their employer. In general, this obligation involves avoiding conflict of interest and taking care not to tarnish the reputation or prevent the proper functioning of the Company, notably by committing acts of disparagement or undertaking competitive practices that would be against the interest of the Company.

### **What should I do?**

- All employees have to inform their manager and the Human Resources of any stable working relationship with a Company not belonging to the Group or any financial, commercial, professional, familiar or friendly relationship that could affect the impartiality of his conduct with a third party;
- be transparent with your manager, and declare the status of your situation to the competent bodies;
- respect the obligation of confidentiality, professional secrecy and trade secrets;
- be well acquainted with the terms of your employment contract in order to apply the clauses that you are required to respect. If necessary, ask the Human Resources Department to explain it to you.

### **What shouldn't I do?**

- Exercise an activity that competes with that of the Company during the term of your employment contract (including using a period of leave to perform a remunerated activity or training period with a Company, whether or not it is a competitor);
- perform an extra-professional activity in addition to your professional activity that could prevent you from achieving the objectives defined in the context of your salaried activity, or generate conflicts of interests;



- exercise your extra-professional activity during the working hours defined in your contract;
- use the equipment and resources put at your disposal within the context of your work for your extra-professional activities.

### Example

*I am a volunteer in a local association whose values seem very close to those of Leasys Group. Can I use the office photocopying machine to print the association's advertising materials?*

No, you cannot use Company materials or any other corporate resources for the purposes of any extra-professional activity.

## 12. ENVIRONMENTAL STRATEGY

### Definition

The European Commission defines Corporate Social Responsibility (CSR) as the responsibility of companies with regard to the effects they have on society and, more specifically, how companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders on a voluntary basis.

### Details

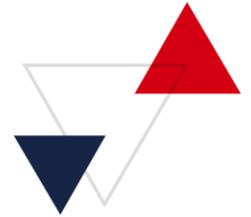
Businesses must contribute to sustainable development, including the health and well-being of society.

To this end, they must commit to:

- Taking into account stakeholders' expectations;
- Fully meeting legal obligations or even going beyond them;
- Investing more in human capital and the environment, integrating this responsibility across the organisation and implementing it in all internal and external relations.

### The commitment of Leasys Group

Creating a culture of sustainability requires effective risk management, responsible and proactive decision making and innovation. Our efforts minimise the negative impacts on natural resources and the **global environment**. More specifically, Leasys Group considers environmental protection as a key consideration to be fostered in the overall approach to business. Leasys Group is committed to continuous improvement of the environmental performance of its operations, and to comply with all relevant legal and regulatory requirements.



## **What should I do?**

- Acknowledge the active protection of the environment as the essence of Leasys Group's identity, and present it as such in your daily internal and external professional activities;
- be aware of the daily impact of your behaviour on the environment;
- take personal responsibility and take into consideration the direct and indirect environmental impacts generated by your professional activity;
- commit yourself to contribute to the Group's environmental objectives and actions, particularly in discussions with customers and stakeholders and when speaking outside of the Company.

## **What shouldn't I do?**

- Ignore the environmental objectives and commitments made by the Group;
- believe that Leasys Group is not concerned by the environment.

## **Examples**

*A colleague believes that because we already comply with environmental legislation, it is pointless to implement any new environmental measures.*

You can reply by saying that the Group's commitment to the environment goes beyond compliance with the law and regulations. In addition to the positive impacts generated for stakeholders, the reduction in raw material consumption significantly reduces our costs. Taking environmental risks into account in advance helps reduce our risks.

*I do not understand why we, as a service Company, should be concerned with the environment. We are not an industrial Company with factories.*

As a player in the long term rental sector, we have a duty as leader to serve as a role model. Our operations (namely, employee business travel, the impacts of our IT System and waste-sorting activity) can still be improved in order to reduce our environmental footprint.

## **13.SUPPORTING OUR COMMUNITIES**

### **Definition**

Since Leasys Group is committed to promoting its Company values, it contributes to the development of the communities by providing support in their economic and social initiatives.

### **The commitment of Leasys Group**



Leasys Group believes that it is our duty invest and engage in **community programmes** by providing financial support and promoting employee volunteerism to help enrich the vitality of the communities where we live and work. The development of philanthropic initiatives and the support of various groups demonstrate our commitment to our communities.

### **What should I do?**

- Understand that supporting our community is an integral part of the Group's culture. Close customer relationships, responsibility and solidarity are the values that should encourage you to contribute to actions designed to improve development conditions;
- ensuring that all philanthropic initiative are guided by the responsible local management.

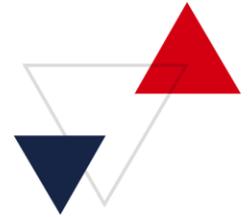
### **What shouldn't I do?**

- Donating to private persons or to lucrative organisations on behalf of Leasys Group;
- supporting an organisation that could have a negative impact on Leasys Group's reputation.

### **Example**

*In which way is Leasys Group concerned about contributing to the local communities?*

In case of specific events that impact local communities, Leasys Group is used to pay particular attention to the importance of the social needs by contributing to the communities through the promotion of charitable and philanthropic initiatives.



## **ANTI-CORRUPTION**

### **14. THE FIGHT AGAINST CORRUPTION**

#### **Definition**

Corruption is the act of an individual in a specific public or private office who solicits, proposes or accepts a gift, an offer or a promise for the purposes of performing, delaying or omitting to perform an act which is, directly or indirectly, within the sphere of his/her duties.

#### **Details**

Anti-bribery and anti-corruption laws implementing the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the OECD Guidelines, and other foreign laws prohibit providing anything of value, directly or indirectly (such as through an intermediary), not only to domestic, but also to foreign third parties (e.g. government, political or military employees, etc.), or to representatives of international organisations (such as the United Nations and the World Bank), or to private entities/individuals for the purpose of obtaining or retaining business or securing any improper advantage.

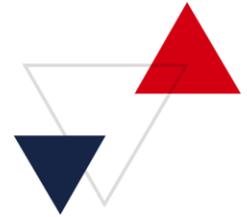
Active bribery is the deliberate act of making, either directly or indirectly, offers, promises, donations, gifts or any other advantage to public officials or private persons in order that they perform or refrain from performing an act within the scope of their duties.

Passive bribery concerns public officials or private persons who solicit or authorise, directly or indirectly, promises, donations, gifts, or any advantages for themselves or for others, in order to perform or refrain from performing an act within the scope of their duties.

#### **The commitment of Leasys Group**

Leasys Group is committed to the highest standards of integrity, honesty and fairness in all internal and external affairs and will not tolerate any kind of bribery. The laws of virtually all countries in which Leasys Group operates prohibit bribery.

Leasys Group's policy is that no one - directors, officers or other employees, agents or representatives - shall, directly or indirectly, give, offer, request, promise, authorise, solicit or accept bribes or any other perquisite (including gift or gratuities with the exception of commercial items universally accepted in an international context of modest economic value, permitted by applicable laws and in compliance with the Code and all applicable Policies and Procedures) in connection with their work for Leasys Group at any time for any reason.



## **What should I do?**

- If you feel pressure from, or are solicited by a third party, inform your manager, the Human Resources and Compliance, and evaluate also the possibility to report the case by the whistleblowing channels made available by Leasys Group;
- declare internally all gifts and benefits worth over EUR 100 that are offered or received, or sent directly to your home;
- respect the existing approval procedures for expenses incurred by staff members;
- be constantly on the alert and monitor all your relationships with intermediaries and suppliers;
- respect the recruitment procedures defined by the Group;
- ensure that all payments are substantiated, documented and properly authorised.

## **What shouldn't I do?**

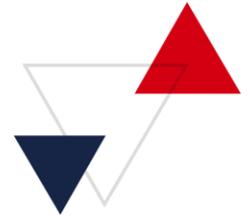
- Offer, promise or agree to give a benefit (financial or otherwise) to a third party, for the purposes of inducing them to improperly perform or refrain from performing an act;
- solicit, receive or accept any benefits (financial or otherwise) in exchange for performing a task, give consent under a commercial agreement or carry out any other action in the course of your duties or activities;
- favour a third party in calls for tenders;
- offer or accept gifts and benefits other than those that have been authorised;
- accept an offer by a third party to finance a trip for you, either partially or in full, even if it is for business reasons.

## **Examples**

*One of my suppliers has offered me a weekend by the sea. In exchange, all I need to do is reduce his due payment date by a few weeks. Can I do this?*

It is forbidden to take advantage of your position or duties to receive any gifts or benefits. Immediately alert your manager, the Human Resources and Compliance to the fact that someone has tried to bribe you and evaluate also the possibility to report the case by the whistleblowing channels made available by the Leasys Group.

*In the context of a tender to select a provider or of agreements with new business partners, I was contacted by a potential new partner who claims more advantageous commercial and contractual*



*conditions (for example, higher commissions), against money transferred on my personal account. What should I do?*

Refuse this proposal immediately and report this situation to your manager and the Compliance Department.

*A supplier with whom I have very good relations has invited me to a trade show on the other side of the world; he also offered to pay part of my trip. What should I do?*

Politely decline the offer. To preserve the independence of the Group and its employees, it is not possible to allow a third party to pay for all or part of a trip, even a business one.

*One of my line managers requested that I ask one of our usual outside contractors to hire a member of his family. What should I do?*

Politely decline the request and tell your direct manager.

*My job position allows me to access client files. I was contacted by one of my acquaintances who wishes to obtain files or customer data in exchange of a sum of money. What should I do?*

Refuse and report this situation to your manager and the Compliance Department.

Disclosing confidential customer data in exchange for an undue advantage is an act of corruption and is punishable by law.

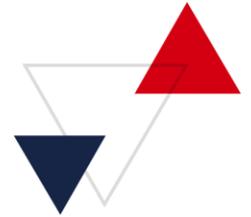
## **15.FIGHT AGAINST INFLUENCE PEDDLING AND INTERACTION WITH PUBLIC OFFICIALS**

### **Definition**

Influence peddling is the act of persons in a position of public authority or entrusted with a public services mission, or elected officials, who solicit or illegally accept offers, promises, donations, presents or benefits of any kind for themselves or for others, with the aim of using their real or supposed influence to obtain awards, jobs, markets or any other positive decision from a public authority or public administration.

### **Details**

Influence peddling is the act of monetising a person's position or real or supposed influence in order to influence a decision to be made by a third party. This involves three parties: the beneficiary (who provides the benefits or makes the donations), the intermediary (who uses the credit he has because of his position) and the target person (who holds the decision-making power, e.g. public authority or administration, magistrate, expert, etc.).



## **The commitment of Leasys Group**

All employees must adopt business behaviour that is in accordance with applicable regulations in the countries where we operate. Offering gifts, benefits or public relations activities to public officials is strictly prohibited. Certain activities involving public officials require particular vigilance.

### **What should I do?**

- If pressured or solicited by a public official, alert your manager, the Human Resources and Compliance and evaluate also the possibility to report the case by the whistleblowing channels made available by the Leasys Group;
- comply with the procedures for activities involving public officials;
- be constantly on the alert and regularly monitor all transactions involving public officials;
- ensure that any intermediary payment is proportional with the work delivered rather than a percentage of the market / project
- ensure that all payments and expenses involving public officials are properly authorised, accounted for and documented.

### **What shouldn't I do?**

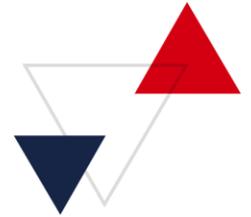
- Offer, promise or consent to give a benefit (financial or otherwise) to a public official for the purpose of inducing them to improperly perform or refrain from performing an act;
- favour a relative of a public official within the context of a call for tenders or recruitment process;
- give cash or other benefits to public officials.

## **Examples**

*To open a subsidiary in a foreign country, we need to obtain a licence. An employee of a government department in this country offered to exert influence on the person in charge of granting licences and asked me to pay part of the amount required into a bank account. What should I do?*

Refuse and notify your manager as soon as possible and seek advice from the Compliance to avoid becoming involved in a corrupt procedure.

*I am in charge of a sales department within the Group. A municipality looking for long-term rental services is seeking information on companies offering such services, including our Group. One of my acquaintances, who is the deputy mayor of the municipality, is offering to use his influence to discretely obtain a copy of the competing offers from the mayor. In exchange, they want an expensive gift.*



Refuse the request, which constitutes an active act of influence peddling. Discuss it with your manager.

*I am doing expansion work in my main home and seeking a building permit. One of my acquaintances, deputy mayor of the municipality, proposes to use his influence in order to accelerate the process of obtaining permits, in all discretion. In exchange, he claims the recruitment of his wife in my service. What should I do?*

Refuse and report this situation to your manager and the Compliance Department.

## **16. FIGHT AGAINST FACILITATION PAYMENTS**

### **Definition**

Facilitation payments are generally small sums of money that are paid directly or indirectly to public official in order to carry out or speed up formal administrative procedures. These payments are notably made within the context of processing visa applications, issuing authorisations, permits and licences and for customs procedures.

### **Details**

Facilitation payments are considered corrupt acts. These are prohibited by the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of 17 December 1997.

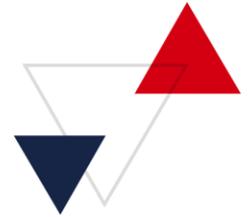
### **The commitment of Leasys Group**

Facilitation payments are strictly forbidden. Only in exceptional cases, particularly where the security or physical safety of an employee is threatened, can exceptions be made. In such situations, the Compliance should be notified as soon as possible. In addition, facilitation payments must be duly identified and recorded in the accounting books and documents of the Company.

### **What should I do?**

- Consult your manager or the Compliance if you receive a request for a facilitation payment from a public official;
- alert your manager or the Compliance if, in the context of an exceptional situation, you have made a transaction that may be considered a facilitation payment;
- keep all documents relating to any transaction that could be considered a facilitation payment.

### **What shouldn't I do?**



- Offer, promise or give a benefit (financial or otherwise) to a public official within the context of performing a routine administrative task;
- in case of request of facilitation payment, do not act on your own.

## Examples

*To obtain a permit within the context of an extension of premises, an official offers to speed up the authorisation process, which usually takes several months, in exchange of a gift. Should I pay?*

No, you should not, because this sum is not a legitimate expense. Inform your manager or the Compliance, because facilitation payments can be considered as corrupt acts.

*I have to go on a business trip to a country for which I need a visa. At the embassy, an agent informs me that the time to obtain the visa is longer than I had foreseen. He is offering to speed up the process for me if I offer him the granting of a financial application. What should I do?*

To avoid any act of corruption, politely decline the offer and immediately inform your manager or the Compliance.

## 17. CONFLICTS OF INTERESTS

### Definition

A conflict of interests is a situation where the personal interests of an employee may conflict with those of Leasys Group. In other words, when the personal interests of employees or members of management bodies may influence their discretion or decision-making capacity when carrying out their professional duties. Conflicts of interests can be of a personal nature (such as family ties), professional (such as commercial relations), financial (as in personal loans) or political (having an influence on the Company).

### The commitment of Leasys Group

Conflicts of interest may arise when members of Leasys Group's workforce engage in activities or have interests that compromise the interests of our Company, because these activities or interests may compromise objective business decision making or otherwise interfere with the performance of work-related duties. Such activities can harm the Company financially, but even more significantly, can be damaging to our reputation. Conflicts of interest also arise when an employee, officer or director, or a member of his/her family, receives improper personal benefits as a result of his/her position in the Company. It is therefore crucial that you properly manage your relationships and your activities, both inside and outside of the work environment, in ways that do not interfere with, or even appear to interfere with, your ability to perform your duties and to make objective and fair business decisions.



Our workforce is expected to always maintain the highest degree of integrity when dealing with our business partners and to act solely in the best interest of the Company.

### **What should I do?**

- Respect the Group's prevention principles and measures notably regarding gifts and benefits, public relations activities and extra-professional activities, to ensure you maintain your independence of judgement and avoid situations of conflicts of interests;
- To ensure that Leasys Group has the full benefit of an employee's time and talent, service on any board, for-profit or non-profit, please consult HR and Compliance Departments to determine whether such service must be approved in advance by the appropriate parties;
- declare your elected public offices to your manager and Compliance Manager;
- declare all privately-held administrative, management or executive mandates with any for-profit and non-profit organisations, customers or suppliers of the Group to your manager and Compliance Manager, and request prior approval to hold a corporate office outside the Group;
- inform your manager of any personal or family ties you may have with a third party in relation to the Company;
- Inform your Compliance Manager of any potential direct or indirect conflict of interests and abstain to participate in debates or decision-making on the subjects concerned.
- any situation that constitutes a conflict or gives the appearance of a potential conflict must be disclosed immediately by employees to HR and Compliance Departments.

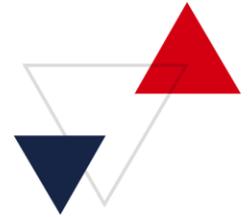
### **What shouldn't I do?**

- Make decisions if your discretion or decisions could be influenced or altered by personal considerations or by pressures imposed by a third party;
- conceal information about any conflict of interests or situations that could create such a situation;
- acquire positions of interest in a competitor, customer or supplier.

### **Examples**

*My manager asked my opinion on selecting a new supplier because he's hesitating between two companies. It turns out that the manager of one of the companies is a childhood friend of mine. How should I react?*

To avoid any conflict of interests, inform your manager in writing about this relationship and withdraw from the selection process.



*A member of my family or a friend is setting up a loan brokerage Company. He wants to have an agreement with Leasys Group. What should I do?*

Report this situation in writing to your manager, who will take all measures to avoid a possible conflict of interests. In particular, do not participate in the selection process.

*I am an employee of Leasys Group with an appointment as a board member in a Company in which Leasys Group is a shareholder. What should I do?*

Report the situation to your manager and/or Compliance, and do not participate in any discussions and decision-making on matters that could create a conflict of interests.

## **18. GIFTS AND INVITATIONS**

### **Definition**

Corporate gifts are those that are offered within the context of business relations. Some may be worth a significant value (trips, electronic equipment, etc.) and are therefore monitored to avoid any risk of corruption. Invitations include any form of social contact and invitation either offered or received. In a commercial context, these public relations interactions take the form of meals, hotel accommodation, seminars, conventions or conferences, or invitations to sports, cultural and social events, as well as business and press trips.

### **The commitment of Leasys Group**

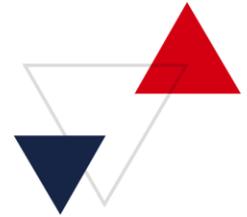
Employees must not accept gifts or invitations, directly or indirectly, which may, even unintentionally, compromise their independence, impartiality or integrity. They must refuse all gifts or invitations that could place them in a conflict of interests. In the same way, it is forbidden to solicit gifts from individuals or companies which either have, or are trying to develop, business relations with the Group.

For gift and benefits both given or received, the maximum monetary value is set at EUR 100. Gifts with a monetary value greater than such amount should not be accepted.

Leasys Group does not forbid employees from making or accepting public relations invitations. These are gestures of courtesy and welcome between business partners. However, these public relations must be clearly justified at the business level. For all public relations activities, customers must always be accompanied by the employee of the entity that issued the invitation.

### **What should I do?**

- If you are a manager, make sure that your staff are aware of the rules regarding gifts and invitations, public relations activities and business trips, as defined in the Group policies;



- before accepting a gift or an invitation, ask yourself how this could be perceived publicly and refuse offers that might create a conflict of interests for you;
- be transparent with your manager to avoid any suspicion;
- do not accept gifts with a monetary value greater than EUR100. Also, the party making the gift should be informed of the requirements set out in the policies of the Group.

### **What shouldn't I do?**

- Solicit any form of gift or benefit for your own account or for that of a third party;
- receive any form of remuneration from a counterparty, an intermediary, a supplier or a customer, either directly or indirectly;
- give or receive gifts in cash;
- offer or accept any public relations gifts or invitations that could damage the Group's image.

### **Examples**

*Can I offer a customer tickets to a show without attending myself?*

No, you must attend as a representative of your business activity. The same goes for invitations received from providers. In any case, the managing of all the gifts, including tickets for shows, sporting events and other public events, must be submitted to the process steps defined in the Corporate Gift and Entertainments Policy.

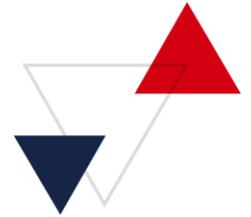
*I received some small gifts sent to my personal address from one of my business contacts. I am not very comfortable with this because my manager does not know: what should I do?*

The right thing to do is to tell your manager and seek advice from the Compliance. They will tell you the most appropriate way to handle the situation and avoid becoming involved in any corrupt dealings.

## **19.LOBBYING AND FINANCING POLITICAL PARTIES**

### **Definition**

Lobbying or the representation of interests describes any direct or indirect communication with public officials for the purposes of influencing public decisions. Consulting people representing interests enables the legislator to obtain information about how the law is enforced and how to improve it. It also gives public decision makers greater insight into what civil society expects. The financing of political parties by legal entities (companies, foundations, etc.) is strictly forbidden.



## **The commitment of Leasys Group**

Leasys Group is committed to conduct its government and public institution relations including lobbying in accordance with applicable laws and ethics rules and in full compliance with the Code and any applicable local procedures. Leasys Group's relations with government agencies, other Authorities and public institutions shall be managed only by duly designated departments.

To the extent allowed by local law and approved in accordance with the relevant Leasys Group's procedures and with the anti-bribery and anti-corruption measures, any gift or gratuity made to representatives of any government or public institution shall be modest and proportionate to the legitimate business purpose and must not give any appearance that Leasys Group is obtaining or seeking to obtain an unfair advantage.

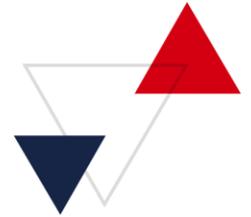
Every money or value transfers (payment, loans or other value) to a government official or employee is prohibited with the exception of the normal business offer of the Company, unless such actions are allowed under applicable laws, government ethics rules, as applicable, and provided by the relevant Leasys Group's procedures.

### **What should I do?**

- Be transparent about your lobbying activities, inside and outside the Group;
- declare the offices you hold in various trade associations;
- base your arguments on reliable information that has been analysed and audited at internal level;
- highlight the consequences for the different stakeholders;
- record all organisations on behalf of which you lobby in the register of representatives of interests, if one exists.
- declare your elected public offices to your manager and Compliance Manager;
- make sure that you do not commit the Group with your political opinions and actions;
- refuse any solicitation in any form whatsoever that requests your political support and could make the Group liable;
- keep and update the list of meetings you make with public decision makers, for the purposes of influencing public decisions.

### **What shouldn't I do?**

- Use corruption and any dishonest or abusive practices;



- use the resources or funds of the Group to engage it in fund-raising or political support activities;
- offer or accept any gifts and benefits;
- organise colloquia, events or meetings, in which the modalities of speaking of these persons are linked to the payment of remuneration in any form whatsoever;
- use, for commercial or advertising purposes, information obtained from the Government, an independent administrative or public authority;
- sell to third parties copies of documents from the Government, an independent administrative or public authority, or use letterhead and the logo of these public authorities and administrative bodies.

## Examples

*What should I do if one of our business partner asks me to support his political campaign in the local elections?*

Refuse this request for support in order to ensure the political neutrality of the Group and immediately inform your manager or the Compliance.

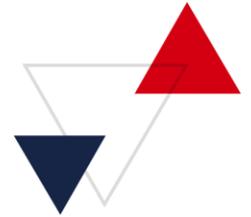
## 20. PATRONAGE AND CHARITABLE ACTIONS

### Definition

Patronage enables companies to make donations to organisations in the form of financial or material support for the purposes of supporting a work of general interest or acquiring a cultural object. A charitable contribution is a grant or donation made to an organisation for a charitable purpose. It may take the form of cash or an in-kind contribution or a service.

### The commitment of Leasys Group

Leasys Group believes that it is our duty to also invest and engage in community programmes by providing financial support and promoting employee volunteerism to help enrich the vitality of the communities where we live and work. The development of philanthropic initiatives and the support of various groups demonstrate our commitment to our communities. Leasys Group actively supports volunteerism and other opportunities to engage in the community. Giving back to the community is part of the framework that unites us. Leasys Group's philanthropic initiatives must be guided by the responsible local management. In considering which initiatives to support, the Company is mindful that support of one organisation and/or initiative does not result in alienating or offending others in our



workforce or community, and that it should never be used to disguise an illegitimate benefit that is intended, or appears to be intended, to influence decision making.

### **What should I do?**

- Prefer charitable organisations whose accounts are published and regularly audited;
- select the project that has adequate financial and personnel resources to achieve its objectives;
- ensure that all contracts drawn up with the organisations concerned incorporate compliance clauses and make sure you are in a position to verify how these funds are used;
- ensure that all expenses incurred by charitable organisations have been properly authorised, accounted for and documented.
- ensure that there are not any conflict of interests with the organisation (eg. your manager is a director in the organisation).

### **What shouldn't I do?**

- Make donations to individuals or for-profit organisations;
- finance works that indirectly benefit, or are controlled by politicians, public officials or their relatives;
- support organisations that could have a negative impact on the Company's reputation;
- make cash payments.

### **Examples**

*A public official contacted me to find out if Leasys Group would help finance his wife's charity for underprivileged children. What should I do?*

Contact your manager or Compliance immediately to assess the situation and define the process to be followed.

*Leasys Group has been providing financial support to an environmental charity for several years. Within the context of a control of the use of funds, I noticed that the financial contributions made by the Group had been used to print leaflets, which was not the initial purpose of the Group's support. In addition, the printing Company is owned by the sister of the treasurer of the association. What should I do?*

Speak immediately about this to your manager or Compliance.



## **21. SPONSORSHIP**

Sponsorship, or sponsoring, is a form of marketing whereby the Company assumes all or part of the expenses of a project or programme in exchange for obtaining visibility on media platforms or events.

### **Details**

The Company benefits from the fact that its logos and brands are displayed by the project or programme in question, and that it receives a specific mention specifying that it has contributed to the financing. This may involve non-profit organisations and commercial entities. Sponsorship is an integral part of Leasys Group's marketing and communication strategy.

The selection of all the events to be held or in which to take part during the year (along with the related costs) must be made as part of the budget process by Marketing and approved by the CEO/CM.

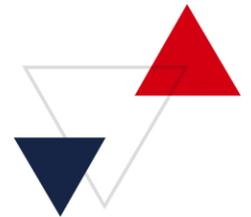
Sponsorships must comply with the principles and internal rules of the Group and must never be used to favour unduly, influence improperly or give the appearance of improperly influencing any person in charge of making decisions.

### **What should I do?**

- Carefully select the sponsored organisation, in the light of its experience and reputation;
- prefer sponsored organisations whose accounts are published and regularly audited;
- draw up a contract including compliance clauses with the sponsored organisation; and describing the benefit received in counterparty of the sponsorship
- inform all stakeholders of the sponsorship;
- transfer funds in several instalments and ensure that each payment is properly used;
- in the selection of sponsored events and participants, follow all the steps defined in the internal policies and procedures;
- send the guest list, including any invitees affiliated with the Public Administration, to the CEO or Country Manager for approval.

### **What shouldn't I do?**

- Sponsor an organisation suggested by a public official;
- sponsor an organisation that indirectly benefits, or is controlled by, politicians, public officials or their relatives;



- sponsor an organisation that is related to projects in which Leasys Group is involved for commercial purposes.

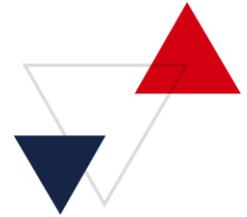
## Examples

*As a Marketing representative, I was contacted by the treasurer of a group who suggested that Leasys Group sponsors an event in exchange for a multi-million Euros contract. How should I react?*

Decline the offer because conduct such as this is a form of corruption and immediately speak to your manager or Compliance.

*I read in a newspaper that a sport tournament sponsored by Leasys Group is involved in financial scandals. I am afraid that the name of the Group may be associated with this scandal. How should I react?*

Speak to your manager or Compliance immediately in order to determine the right course of action to take: this situation could have an impact on the reputation of the Group and of its employees.



## PROTECTION AND REPUTATION OF THE GROUP

### 22. CONFIDENTIALITY

#### Definition

Confidentiality and professional secrecy are the fundamental principles in the profession. They must be an ongoing concern for all employees, regardless of the area in which they perform their duties.

#### Details

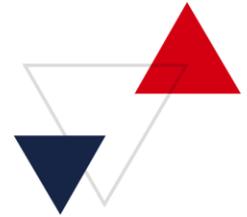
All information relating to customers, as well as to Leasys Group, the other entities of the Group, (their employees, their customers, and their internal organisation), its information systems, its security procedures, its suppliers and its subcontractors, is confidential. The disclosure of any confidential information makes the establishment and the employee involved liable. When this concerns non-public information of a listed Company, a breach of confidentiality may be criminally, administratively and professionally sanctioned. Confidentiality concerns all types and forms of customer information. This information cannot be revealed outside the Company, nor can it be shared within the Company with people who do not require access to it to perform their duties.

#### The commitment of Leasys Group

Leasys Group ensures confidentiality in all circumstances and applies to all types of media. All Leasys Group's employees are the custodians of and responsible for the confidential information they receive. Employees may use this information internally for professional purposes and make disclosures outside the Company only if authorised to do so or in the cases provided for by law. They ensure the security of its confidential data by exclusively using the devices made available by the Group. Leasys Group's employees must also apply the principle of confidentiality with the utmost rigour when using social media. They are responsible for everything they publish on the Internet regarding the Group and must ensure not to disseminate any information via the Internet that they would not divulge outside Leasys Group by any other means. This principle of confidentiality also applies to business social networks.

#### ***What should I do?***

- Respect the strict confidentiality of the information to which you have access concerning Leasys Group's customers and more generally of the Group;
- always obtain the express written authorisation by customers when you need to transmit a piece of confidential information that concerns them;
- only share confidential information within Leasys Group, with the persons concerned and solely for the purposes of their duties;



- manage email messages according to the level of confidentiality of the information contained therein;
- always make sure that a confidentiality agreement exists before sharing confidential information with an external professional;
- protect confidential information against unauthorised use and access, both for paper or electronic data;
- if you have any doubts about the information you want to share on the social media, ask your manager or Compliance beforehand.

### **What shouldn't I do?**

- Disclose any information about the Group's customers or Leasys Group to outside parties;
- send any confidential information to personal emails, boxes or to a personal online data storage service;
- post any information that are confidential or that could harm customers, your Company, your function or Leasys Group on the social media or other media.

### **Examples**

*When travelling in public transport, can I take advantage of the time to get on with my work?*

Laptop screens without privacy filters can be easily read by other passengers. Do not work on confidential documents under such conditions. This also applies for tablets and mobile phones.

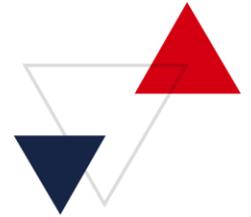
*I have to draft the minutes of the Committee and a colleague offered to help me with the formatting. Can I email it to them?*

You must guarantee the confidentiality of this document and limit its circulation. If your colleague did not attend the Committee meeting, you cannot do this.

## **23.FIGHT AGAINST MONEY LAUNDERING AND THE FINANCING OF TERRORISM**

### **Definition**

Money laundering and terrorist financing are phenomena of unprecedented scale. They affect our societies in general and the economic development of countries. This enables criminals to infiltrate financial institutions, control certain economic sectors and corrupt management bodies and governments, affect citizens' lives, and affect key principles such as democracy.



## **Details**

Money laundering is the process of making money, obtained by illicit or criminal means, appear clean. The laundering of illegal funds is also used for the purposes of financing terrorism. Terrorism may also be financed by legal funds used for the purposes of carrying out a terrorist action. This is referred to as “reverse money laundering”.

## **The commitment of Leasys Group**

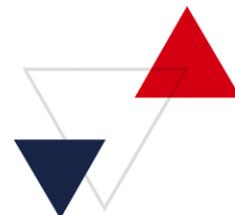
Leasys Group prohibits money laundering or any activity that facilitates money laundering or the funding of terrorist or other criminal activities. Before establishing any business relationship with a third party, Leasys Group and its officers or employees shall check required information (including financial information) on its proposed business partners and suppliers to ensure that they are reputable and involved in a legitimate business. Leasys Group shall always comply with the applicable anti-money laundering laws and regulations.

### **What should I do?**

- Make sure you are kept informed on these topics even if you are not directly exposed;
- if you are a manager, do your utmost to ensure that your employees are well informed about these topics;
- actively implement anti-money laundering and anti-terrorist financing internal policies;
- pay particular attention to ensure you know as much as you can about your customers when they start a relationship with the Company;
- remain vigilant at all times and look for any unusual, atypical, complex transactions that have no apparent economic justification and could clearly be illegal;
- ask customers to provide a reasoned explanation for their transactions;
- refuse to carry out any transaction that is not economically justified, or where there is any doubt as to the identities of the originators or the beneficiaries.

### **What shouldn't I do?**

- Fail to strictly apply procedures, for example for commercial reasons;
- tell customers that they may be suspected of money laundering, or reveal such information to a third party;
- perpetrate, advise or assist in any placement, concealment or consolidation transaction.



## Examples

*During a credit evaluation I noticed some alerts of unusual transaction. How should I go about analysing the transaction?*

Inform without delay the Compliance Department.

## 24. FIGHT AGAINST TAX EVASION

### Definition

Tax evasion is the act of avoiding or reducing tax by declaring one's taxable wealth or profits in a country that is different from where they should be declared. Tax evasion concerns both companies and individuals that fail to declare their taxes. In a wider sense, tax evasion involves using various legal means to reduce one's tax burden. This differs from tax fraud, which is an illegal practice.

### The commitment of Leasys Group

Leasys Group considers that a consistent and responsible tax approach is an essential part of its long-term strategy. Leasys Group treats any tax issues with integrity and transparency. All operations and transactions carried out are based on an economic reality and Leasys Group does not seek to avoid tax through structures provided for this purpose.

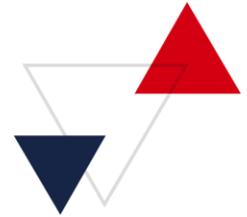
Leasys Group undertakes not to set up or propose operations exclusively for tax purposes, or to assist its customers in circumventing their tax obligations or operating in states or territories whose jurisdictions are categorised by the EU as "non-cooperative" (tax havens).

### **What should I do?**

- Respect the laws and regulations in force in the states and territories where we carry out our activities;
- remain attentive to, identify and promptly report any action aimed, directly or indirectly, at circumventing tax rules;
- if in doubt, contact your Finance Department.

### **What shouldn't I do?**

- Deliberately shield Leasys Group from its tax obligations;
- advise a customer and/or participate in a financial arrangement aimed at circumventing tax rules;



- sign any self-certifications on behalf of your customers;
- remove or conceal any information for the purposes of covering up any evidence of an operation being linked to a tax haven.

## Examples

*I live in Italy and have dual Italo-American citizenship. I don't think I should be considered a US citizen.*

As you have dual citizenship, you are considered a "U.S. Person" with the obligations attached thereto. Unlike most other jurisdictions, liability to US taxation is attached to citizenship, not to place of residence. This means that US citizens living abroad must file an annual US tax return, regardless of their place of residence.

## 25. INTERNATIONAL SANCTIONS

### Definition

International sanctions are measures taken by one or more states against natural and/or legal persons (for example freezing assets) and against countries or governments (embargo measures). Sanctions are taken to combat terrorism, nuclear proliferation activities and human rights violations.

### Details

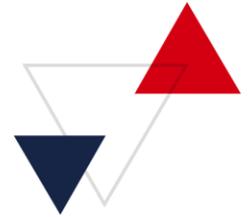
Most of the international sanctions applicable at the level of Leasys Group and of the entire Leasys Group are issued, administered or enforced by the UN Security Council, the European Union, Italy as well as by competent local authorities where the Group operates.

### The commitment of Leasys Group

Leasys Group strives to ensure strict compliance with the law on international sanctions, which can be complex and of extraterritorial scope in countries and territories where the Group carries out its activities. Compliance with these requirements is ensured through the internal policies and procedures ensuring compliance with the law on international sanctions. Leasys Group does not tolerate any breach of international sanctions.

### **What should I do?**

- Remain attentive to, identify and promptly report any violation or attempted violation of international sanctions, as well as any action taken, directly or indirectly, to circumvent them;
- keep your customer knowledge files up to date and complete;



- monitor the compliance of operations with international sanctions;
- if in doubt, contact your Compliance.

### **What shouldn't I do?**

- Participate in any financial transactions that do not justify their complexity;
- remove or conceal any information for the purposes of covering up evidence of a transaction with countries or persons that are subject to international sanctions;
- modify tools or IT processes for the purposes of removing information that is useful for detecting the risk of international sanctions;
- advise a customer and/or participate in a financial arrangement aimed at circumventing international sanctions.

### **Examples**

*I want to get in touch with a supplier. This supplier is based in a country subject to international sanctions or in a country listed in countries to be considered at risk. What should I do?*

Before entering into a relationship, collect the beneficial ownership information and apply for Compliance opinion within the Compliance Department.

## **26. PREVENTION OF FRAUD**

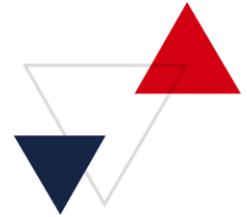
### **Definition**

Fraud is an intentional act that is carried out for the purposes of obtaining a material or intangible benefit, to the detriment of a third person or organisation. In the case of the infringement of laws, regulations or internal rules, fraud is characterised by the infringements of the rights of others and the total or partial concealment of an operation, a set of operations or their characteristics.

### **Details**

Two types of fraud exist depending on the origin of the parties involved:

- external fraud: an act carried out by individuals (customers or otherwise), on their own or in a group, for the purposes of obtaining funds, documents or information they can use for their own benefit and to the detriment of a Company, its customers or third parties;
- internal fraud: a malicious act carried out by an employee to the detriment of their Company or of interests of any third parties managed by the Company. Fraud can also be characterised by a



malicious act carried out by an employee with the complicity of individuals outside the Company. This is referred to as mixed fraud.

## **The commitment of Leasys Group**

Leasys Group places great importance on the prevention of fraud, which uses a growing number of techniques that are becoming increasingly more sophisticated, particularly in the light of the digital transformation. In order to combat the surge in the number of cases of fraud, it is essential to tackle the issue at both the upstream and downstream levels. All employees, whatever their duties, have a role to play in fraud prevention. Thanks to the daily vigilance of everyone in the Group, we can prevent and detect attempts at fraud.

### **What should I do?**

- Be well acquainted with the law and best practice concerning fraud prevention, and apply them responsibly with constant vigilance;
- if you suspect anything fraudulent or are in doubt, immediately alert your manager and the Risk & Permanent Control so that they can act quickly, and evaluate also the possibility to report the case by the whistleblowing channels made available by Leasys Group;
- if you have any doubts about the identity of the sender of an email, forward the email to your IT contact;
- if you are a manager, you should evaluate the risk of fraud attached to your activities, and enforce the principles of good conduct;
- respect the principle of segregation of duties, whereby those carrying out or executing an operation cannot approve or settle it.

### **What shouldn't I do?**

- Communicate your passwords to anyone, lend your access badge, or leave confidential information or documents on your desk;
- open emails or attachments from an unknown sender;
- discuss sensitive issues that could involve Leasys Group in public places;
- Use external supports (external hard drives or USB sticks) without taking precautions.

## **Examples**

*I've just received an email with an attachment from an unknown address. Can I open it?*



To limit the risk of phishing and being infected by spyware, never open any email if you do not know the sender.

*A friend lent me his USB stick containing interesting articles. Can I use it at my place of work?*

This could create computer security problems. As such, you must first make sure that the USB stick contains no viruses that could infect the information system.

## **27. PREVENTION OF MARKET ABUSE**

### **Definition**

Insider trading, share price manipulation, and dissemination of false or misleading information are examples of market abuse. The fight against market abuse means preserving the integrity and transparency of markets as well as public trust. As such, it is the responsibility of everyone to respect the principle of equality of information between investors.

The person involved in these activities may be subject to disciplinary, pecuniary, civil and criminal penalties.

### **Details**

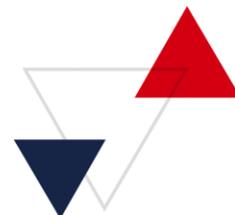
If confidential information relating to a listed Company is made public, this "insider" information may influence the market price of the financial instruments concerned or those related to them. Confidential information can be communicated in writing, orally, or can be simply deduced. Using, transmitting and recommending this information for one's own account or for that of a third party constitute acts of insider dealing and, as such, are strictly prohibited and severely sanctioned.

### **The commitment of Leasys Group**

Leasys Group's policy is that no director, officer, or member of the workforce should ever purchase or sale bonds issued by Leasys Group or by its subsidiaries, and securities of Leasys Group's shareholders or their affiliates, either personally or on behalf of others, based on material, non-public information, and disclose or communicate such material, non-public information to others so that they may buy or sell securities. Leasys Group's workforce is strictly required to comply with all applicable laws prohibiting insider trading.

### **What should I do?**

- Be attentive and take all necessary measures to avoid disclosing any insider information. This means respecting the information barriers in place;
- if you are on an insider list, you must abide by the associated abstention obligations;



- if you think you are in possession of insider information, tell your manager, who will inform the Compliance Department;
- immediately report any transaction where there is a suspicion of market abuse;

### **What shouldn't I do?**

- Use insider information when acquiring or transferring instruments, contracts, or financial or stock market securities to which this information relates, whether for your own account, or on behalf of Leasys Group or that of a third party;
- communicate insider information to a third party outside the normal scope of your duties to persons outside Leasys Group, or to employees who are not authorised to access such information;
- recommend taking positions on a security based on insider information to any third party (employee of the entity or another group entity, or an external third party, etc.).

### **Examples**

*I am in the metro with a colleague and would like to go over something that was brought up during a meeting. Can I talk about it right away?*

Wait until you are somewhere private before discussing it: this will limit the risk of disclosing possibly privileged information that could be overheard by a malicious individual.

*I have some information about strategic operations that the Company has included in its Strategic Plan (e.g. purchasing of a new Company) and a client is making enquiries about this. Can I reveal some piece of information?*

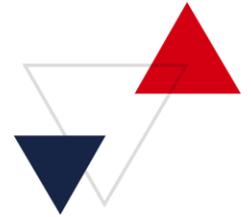
It is strictly forbidden to reveal this kind of information. Revealing strictly confidential information could constitute an insider trading crime and compromise the business, reputation and legal integrity of the Group.

## **28.MANAGING OUR ASSETS AND INFORMATION**

### **Definition**

Managing assets and information refers to the sound and proper use of the Company's resources, as protecting the Company's assets is a collective obligation and a requirement as members of Leasys Group.

### **Details**



Managing assets and information means ensuring:

- the effectiveness of the communication towards internal and external parties;
- the protection of the Company's assets;
- the maintenance of appropriate records, as sound information is vital to satisfy legal, tax or regulatory requirements.

## **The commitment of Leasys Group**

Leasys Group recognises the vital role that honest, clear and effective communication plays in sustaining internal and external relationships and in ensuring high standards in our business.

Each of us is entrusted with protecting the Company's resources and ensuring that they are used for their intended purposes only. As such, it is the responsibility of each workforce member to protect and properly use the Company assets by taking preventative measures to protect any Company property as well as property of third parties' in the Company's possession against loss, theft, damage, abuse and unauthorised use, access or disposal including being used illegally or used in any manner deemed inappropriate.

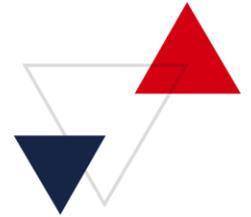
Our customers, investors, business partners, governmental entities and others rely on accurate information generated from the Company's business records. Furthermore, we are required to maintain certain records to satisfy legal, tax or regulatory requirements.

### **What should I do?**

- Promote a clear and transparent communication with customers;
- sharing confidential data only with concerned persons and solely for performing their duties within Leasys Group;
- protecting the Company's resources and ensuring that they are used for their intended purpose only;
- protect and properly use the Company's assets by adopting preventive measures;
- always create, manage and maintain appropriate, authentic, reliable and usable records.

### **What shouldn't I do?**

- Provide the customers with inconsistent information about Leasys Group's products and services;
- illegally use the Company's assets in any manner deemed inappropriate;



- reveal confidential information of Company's assets to third parties;
- create records not compliant with external and internal requirements.

## **Example**

*I lost my computer containing confidential information that could be used by external subjects. What do I have to do in this situation?*

Inform immediately your manager and the Compliance Department. The loss of a Company's asset which includes relevant information could damage the business and reputation of Leasys Group.

## **29.USING SOCIAL NETWORKS**

### **Definition**

The term "social networks" generally refers to all websites that can be used to build a network of personal or professional contacts and to exchange opinions or information.

### **Details**

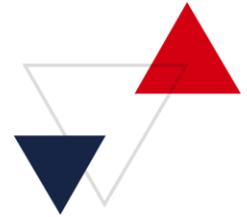
Social media (social networks, blogs, forums etc.) are now part of our everyday life and concern all Leasys Group's personnel, at both personal and professional levels. However, they present risks and, given the number of different media platforms and the volume of information exchanged on them, mastering this form of communication has become a real challenge.

### **The commitment of Leasys Group**

Leasys Group is present on social media networks, so that it can interact with and respond to customer and stakeholder requests, while taking note of any remark made about the Group and its services. Except in cases of abuse, all Leasys Group employees enjoy freedom of expression both inside and outside the Company. Nevertheless, everyone must act responsibly by behaving in an appropriate manner and adopting best practices. Employees may occasionally use the social networks for private purposes at their workstation provided that they do not abuse this privilege but use it properly, on an *ad-hoc* basis, without interfering with their ability to perform their job and without over-stepping their right to freedom of expression to the detriment of the Company, its executives and managers and workplace colleagues.

### **What should I do?**

- Respect the rules of confidentiality to which you are bound by professional obligation;



- be aware of the general conditions of use about how your personal data and the information you put online may be used;
- pay particular attention to social media networks whose servers are hosted in a foreign country, which may have different personal data protection rules;
- check your settings functionalities to ensure the confidentiality of your profile and comments;
- specify that your remarks are your sole responsibility and express your personal opinion;
- do not intervene directly if you read any negative or slanderous comments about the Group so as to avoid giving the authors more visibility;
- if in doubt about the nature of the information, do nothing and ask your manager.

### **What shouldn't I do?**

- Carry out your business activity on the social media without having obtained authorisation from your manager or having carried out a risk analysis;
- express yourself officially on behalf of Leasys Group if you are not a spokesperson appointed by the Communications Department;
- make any remarks that could harm the position of Leasys Group and its employees;
- make comments such as malicious criticism or insults, or remarks of a disparaging, defamatory or indiscreet nature or divulge any confidential information.

### **Examples**

*I took some pictures at the farewell drinks party of one of my colleagues and would like to publish them on my personal page as a souvenir.*

To respect the right to the protection of one's image, ask prior authorisation of the people concerned. For any publication, you must assess whether there is a risk that it could harm your reputation or that of any other natural or legal person.

*I want to create or update my LinkedIn account and publish information about my activity within Leasys Group.*

You can present your duties and the activity of the Company in general but cannot share any confidential information or mention any of your "sensitive" duties.