



Corporate policy

ANTI-CORRUPTION POLICY

Document control

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Classification of the document Public (can be shared outside mateco) Internal (can be shared within mateco without restriction) Confidential (can be shared only within same department, App/Stream) Restricted (can be shared with a very limited number of identified individuals)	Public

Key points

<ul style="list-style-type: none"> > Definition of corruption and concrete examples > Gifts and Hospitality: conditions of offering / acceptance and set-up of value thresholds > Employees' expected behaviour > mateco anti-corruption program framework
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Approval table

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Signature table

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1. Objectif and scope

The purpose of this policy is to provide a defined framework to prevent and to fight against all forms of corruption, mateco may be exposed to while performing its operations.

It applies to all Employees as well as to any other third party who interacts with mateco, either directly or indirectly.

The anti-corruption policy complies with the requirements of international legislations, such as the US FCPA -Foreign Corrupt Practices Act-, the UK Anti-bribery Act, the French Sapin II law and certain provisions specific to the local legislation of the countries in which mateco operates.

This international framework, set forth a stringent regime with extraterritorial features. It is, therefore, essential that we comply with those laws and regulations to prevent any risk of corruption and to protect the integrity of mateco brand.

2. What is corruption?

Corruption encompasses a range of dishonest practices, such as the abuse of power or position for personal gain, the misallocation of resources, the distortion of policies, and erosion of public trust.

Corruption also includes bribery. Bribery refers to the act of offering, giving, receiving, or soliciting something of value with the intention to influence the actions or decisions of an individual in a position of power or authority. It is a form of unethical behavior that undermines fairness, transparency, and trust in various sectors, such as politics, business, and law enforcement.

Corruption can therefore be active, through the act of bribing, or passive, through the fact of being bribed. The mere fact of proposing is sufficient to incur liability.

It results from this definition, that corruption can take different forms:

- > **Bribes:** a sum of money paid outside the legal framework of a transaction to obtain a contract
 - A supplier who will provide our commercial representative with an envelope containing cash, to obtain the entering into a contract with mateco.
- > **Conflict of interest:** situation in which an employee's personal interest is likely to influence the performance of his or her duties within the company.

- An employee who awards contracts to a supplier with whom he has a personal relationship.
- > **Secret commissions:** secret payments made to obtain favors or privileged information. They are often concealed in legitimate transactions.
- > **Gifts:**
 - A potential client offers to a mateco employee a bottle of wine of great value during the negotiation phase of a contract.
- > **Hospitality:**
 - A supplier notices that the service agreement signed with mateco is about to end up, will invite certain persons of contact at mateco, to a michelin star restaurant.

Concerning the **facilitation payments**, it can be defined as a small bribe, also called a 'facilitating' or 'speed' payment; made to secure or expedite the performance of a routine or necessary action, to which the payer has legal or any other entitlement.

Facility payment is considered as a form of corruption even if it is of small value and is as such, prohibited.

3. Gifts and hospitality

As part of our professional activities, it is possible to offer or to receive gifts and hospitality.

It is essential, however, to remember that these gestures can, in certain circumstances, be perceived as corruption if they are meant to influence someone's decisions or actions.

mateco therefore allows the offering and acceptance of gifts and invitations, but under specific conditions to avoid any risk of corruption.

Those conditions are the following ones:

- > **Purpose:** gifts and hospitality must solely aim to strengthen professional relationships and must not be used to gain an improper advantage or influence decisions.
- > **Timing:** Gifts and hospitality shall not be offered shortly before or during the preparation phase for a relevant decision concerning the awarding of a contract.

- > **Frequency:** These gestures should remain occasional to prevent any risk of favoritism or dependency in business relationships.
- > **Value:** additional restrictions may apply based on the value of the gifts or invitations. The higher the value, the greater the need for caution.

3.1 Additional restrictions based on the value for gifts

mateco has defined the following threshold to provide Employees with a framework to ease their assessment of one particular situation.

Gifts value is below €100:

- > Generally, not objectionable, if they reflect reasonable and proportionate norms for the industry, custom or courtesy.

Gifts value is between €100 but no more than €300:

- > Must be approved in writing by the respective supervisor.
- > Gifts in this range of value should be assessed with caution. If Employees have any doubts, they should request advice from the local/group Compliance Responsible.

Gifts value is more than €300:

- > Must be approved in writing by the respective supervisor
- > Coordination is needed with the mateco local/group Compliance Responsible, because documentation of the approval process must be retained for a period of 5 years.

There is some flexibility when the gift is transferred for further use to the relevant mateco group company (e.g. for internal use, general employee use or as a charitable donation), or the value of the gift is – to the extent permitted by law – in whole or in part offset against the employee's pay.

3.2 Additional restrictions based on the value for hospitality

To the same extent as for the gifts, mateco has defined the following thresholds to assist Employees in their assessment, as whether such hospitality is acceptable or not.

Hospitality value is below €100:

- > Generally, not objectionable.

Hospitality value between €100 but no more than €300:

- > Can be deemed reasonable for:
 - Events where the inviting company showcases its own products and services.
 - Events that have a social purpose (e.g., charity events, company celebrations).
 - Business meals if these reflect reasonable and proportionate norms for the industry, custom or courtesy, or provided the invited person can assume that his or her mateco group company would have otherwise assumed the expense of the hospitality.
- > Hospitality in this range of value should be assessed with particular caution. If Employees have any doubts, they should request a decision from their respective superior.

Hospitality value is more than €300:

- > Must be approved in writing by the respective supervisor.
- > Approval may depend upon whether the value of the invitation is – to the extent permitted by law – in whole or in part offset against the employee's pay.

4. Risks of sanctions

Corruption exposes both the involved Employees and mateco to severe sanctions.

Employees may be sued and sanctioned by imprisonment and fines, while a Group company, as a legal entity, can be sentenced to substantial fines. In some cases, mateco relevant management team can also be personally prosecuted and face criminal penalties.

Corruption may furthermore lead to significant costs for mateco, in respect of the investigations, the fines, and all financial compensations to the victims of such illegal practice.

Sanctions may also include enhanced compliance requirements, with the obligation to implement training programs and to replace the involved management team. The company may also be subject to increased due diligence checks from its business partners.

Finally, the reputational consequences should not be underestimated as they can be very damaging. Corruption can destroy public trust, lead to boycott of mateco products or services, and even result in exclusion from certain markets or strategic projects (blacklisting).

5. Expected behaviors

5.1 Employees and Business Partners

It is the individual responsibility of the Employees to reject all forms of corruption, whether active or passive. The same expectation applies towards mateco business partners.


Employees and any other business partners are invited to use all available internal mechanisms to report any suspicion of corruption. They will benefit from the protection granted to any reporter of concern, in accordance with mateco's code of conduct and relevant mateco's policies.

5.2 Company

mateco has implemented a strong compliance program as well as preventive measures such as the ones listed hereafter:

> A code of conduct

mateco Code of conduct is a key element of mateco compliance program. Abiding to the values and principles set forth in the Code of Conduct means conducting our business responsibly, with integrity and in accordance with applicable laws and regulations.

mateco Code of conduct is published on mateco website and can be read here: 

> An internal alert system

At mateco, there will always be an open door should someone witnesses or experiences a compliance concern or should advice be needed in relation to mateco's activities and/or business conduct.

This person of contact may be for instance in the Employees' immediate working environment, a supervisor, a manager, a local HR partner. For third parties, the person of contact may be the local / Group compliance representative.

We encourage anyone to speak-up freely, in trust and to raise good faith compliance concerns, without fear of retaliation.

In addition to these channels, mateco has set-up a platform allowing for anonymous and completely secured communication with mateco compliance responsible, available [HERE](#).

> Risk assessment repository

mateco's compliance program is designed using a risk-based approach.

Each year, mateco's local/Group compliance responsible performs a risk assessment, following a methodology based on a series of questions, to determine which risks are high, medium or low.

This assessment covers risks such as strategy, market, finance and accounting, legal compliance (including corruption), internal controls and governance process, people (HR), IT and the results are documented in a risks repository.

The risks repository is a dynamic document, each time there is an event that may affect mateco risks exposure, there is a new assessment, to maintain the risk evaluation as accurate as possible.

> Due diligence on our business partners

We conduct a yearly evaluation of our key business partners (suppliers, clients) against the requirements of foreign trade law compliance.

This assessment is based on environmental, social and ethical considerations (such as climate impact, modern slavery, corruption).

The due diligence measures include a screening of names against sanctions/restrictive measures lists (such as United Nations, European Union sanctions lists, International Trade Association, OFAC, US bureau of Industry and Security).

> Internal and/or external accounting control procedures

We conduct internal and external accounting control procedures via a dedicated team and several principles such as the segregation of duties and the four-eyes principle.

> A training system

We develop at the country level, a training program which targets all Employees. This program is adjusted on a yearly basis with new content (such as for instance, in respect of privacy and personal data protection, anti-corruption).

> A disciplinary system

Disciplinary sanctions may be decided in case of violation of anti-corruption laws and regulations, as well as with the provisions of the present policy. applicable by mateco, these are outlined in Employees' employment contracts.

> An internal control and evaluation system

mateco entities are subject to a yearly audit which aim to assess and review our processes policies and practices in general. mateco annual account are reviewed by auditors each financial year.

Internal control is an ongoing process which encompasses a set of measures, some of them being described in mateco internal control policy.