Atalian Code of Ethics

ATALIAN GLOBAL SERVICES

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Preamble

At ATALIAN, a leading international Facility Management company, our purpose is to contribute to the well-being of our clients' employees through the outsourcing of all facility management services.
Present in more than 15 countries and supported by more than 63,000 employees, our accession to the United Nations Global Compact since 2012, together with our commitment to comply with the Sustainable Development Goals (SDGs) in the activities we carry out, demonstrates the Group's determination to have a positive impact on its ecosystem.

As Group Executive Chairman of Atalian, I am deeply convinced that the trust of our clients, employees, partners and all our stakeholders is the foundation of our sustainability and legitimacy. Our Code of Ethics sets out the key elements of that trust, built around strong values that underpin our decisions and actions: team spirit grounded in inclusion and diversity in all our missions, customer focus and satisfaction, social and environmental commitment, and irreproachable ethics.

In a constantly changing world, our Code of Ethics is our compass, the common framework enabling each of our employees to act every day with integrity and in line with our values.

More specifically, we affirm a zero-tolerance policy for any breach of this common framework where such breaches are contrary to the law and to our Ethics and Compliance Program.

I affirm our determination to give each of our initiatives the strength of an exemplary approach focused on continuous improvement and the positive impact of our activities. This approach reflects our commitment to making ATALIAN a trusted partner, exemplary in its activities, and demanding compliance with our Code of Ethics throughout its value chain.

Lastly, I invite each and every one of our employees to make full use of our Code of Ethics in their daily decision-making and to report any potential breach to their line manager, HR representative, or through our Professional Whistleblowing System.

Quentin VERCAUTEREN DRUBBEL
Group Executive Chairman

Scope

Our Code of Ethics applies to all Group entities across all territories where we operate. It constitutes a reference framework for all employees, regardless of their status, role or country of assignment, as well as for anyone acting in the name of, or on behalf of, ATALIAN (temporary staff, consultants, service providers). Our Anti-Corruption Code of Conduct and internal policies specify the rules and procedures to be followed to ensure that our decisions and actions comply with our Code of Ethics.

Our Code of Ethics is also shared with our clients and suppliers so as to communicate our vision, our values and the principles guiding our conduct. It is also the foundation of the Group's Supplier Code of Conduct.

All the principles of our Code of Ethics are aligned with the laws and regulations in force in the various countries where ATALIAN operates.

These principles are drawn in particular from the following international instruments:

- The 1948 Universal Declaration of Human Rights;
- The fundamental conventions of the International Labour Organization;
- The OECD Guidelines for Multinational Enterprises;
- The United Nations Global Compact;
- The United Nations Convention against Corruption;
- WHO principles;
- The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
- The Charter of Fundamental Rights of the European Union (18 December 2000).

Our Values

Courage

Attitude: Initiative and Responsibility

Our employees are our greatest asset. Their safety, well-being, fulfilment and commitment are essential. We therefore encourage our employees to take initiative and fully assume their responsibilities.

Ambition and Commitment

Attitude: Responsiveness and Agility

To grow in a complex and constantly changing world, meet our stakeholders' expectations and address new societal challenges, we react quickly, innovate, transform our organisations and reinvent our professions.

Openness and Respect

Attitude: Inclusion and Diversity

Our Group, present in 15 countries, has grown rapidly by bringing together hundreds of companies and federating thousands of employees with extremely diverse cultures and backgrounds. This diversity is a tremendous asset, enabling us to build a company that is open, both local and global.

High Standards

Attitude: Ethics Throughout the Value Chain

We are committed to adopting ethical and responsible behaviour and to honouring our commitments to all our stakeholders. Every decision and every process counts when striving for excellence. We are committed to delivering quality services.

Our Compliance Commitment

Principle 1: Compliance with Applicable Laws and Regulations

Within the Atalian Group, we comply with the laws, standards and regulations applicable wherever we operate. This principle applies particularly, but not exclusively, to regulations relating to anti-corruption, anti-competitive practices, anti-money laundering and counter-terrorist financing, international economic sanctions, and labour law.

Case study

During negotiations with a temporary employment agency, its sales representative offers to find an arrangement outside the negotiations to revise the weighting of the requirements relating to the selection of temporary worker profiles. What should you do?

You must categorically refuse this proposal, reminding them that the rules applicable to the specifications / tender process are the same for everyone. You may invite them to raise questions regarding those requirements during a meeting held as part of the selection process, or by email. At the same time, you must immediately report the situation to your manager, your Compliance Officer or the Compliance Department.

Conduct to avoid

- Breaching a law or regulation in the performance of your duties;
- Tolerating, encouraging or concealing practices contrary to the Code of Ethics;
- Accepting or offering advantages, gifts or favours likely to impair impartiality, independence or professional objectivity;
- Behaving in a manner likely to damage Atalian's image, reputation or credibility.

Right reflexes

- Act with integrity and responsibility in professional relationships, both internal and external;
- Apply the stricter rule where there is a conflict between the Code of Ethics and the laws and regulations of the countries in which we operate;
- Seek advice from your management, the Legal Department, Compliance Officers or Human Resources where there is doubt as to the compliance of a situation or decision;
- Use the internal reporting system in the event of a breach or an identified risk situation.

Principle 2: Compliance with Our Internal Policies

At Atalian, our internal policies are applied rigorously, including the Group's Anti-Corruption Code of Conduct and all operational procedures and processes. Our internal policies constitute an essential framework for ensuring the quality, safety and integrity of our day-to-day activities. Each of us is responsible for knowing, understanding and applying them exemplarily.

Case study

A supplier offers you a free service or a gift to facilitate the implementation of a contract, in exchange for rapid approval without going through all the internal steps required by the Procurement Policy.

You must clearly refuse this undue advantage while recalling that any procurement decision is conditional upon internal policies and must remain objective. You must also inform your manager, your Compliance Officer or the Compliance Department, as this situation could constitute an attempt at corruption.

Conduct to avoid

- Intentionally bypassing an internal policy or procedure, whatever the reason, including in urgent situations or for reasons of speed or operational convenience;
- Ignoring business protocols;
- Communicating decisions without first verifying their compliance with internal policies.

Right reflexes

- Comply with applicable internal policies and procedures;
- Attend training sessions and read communications relating to policies and procedures;
- Ensure the quality, reliability and compliance of the work delivered, in line with internal standards and requirements.

Principle 3: Relationships with Public Authorities

Atalian's relations with public, administrative and judicial authorities are based on principles of legality, transparency and loyal cooperation.

In all interactions with public actors, Group employees must adopt exemplary conduct, consistent with applicable laws and Atalian's ethical commitments. Relations with authorities may under no circumstances be used to obtain favourable treatment or to influence a public decision.

Case study

A DGCCRF inspector arrives on site and asks to review certain documents. What should you do?
You must welcome the inspector courteously and immediately inform your management and the Legal Department so that the requested documents may be provided in accordance with internal rules (confidentiality, authorised scope, traceability). You must never hide or alter information.

Conduct to avoid

- Offering, promising or accepting any advantage, payment, gift or service likely to influence a public decision;
- Acting alone in the name of the Atalian Group before a public authority without first informing the company and the relevant functions;
- Concealing, altering, destroying or delaying access to documents, data or information requested by an authority.

Right reflexes

- Respond accurately, completely and in a timely manner to legitimate requests from competent authorities;
- Provide only the information required, in strict compliance with confidentiality rules, data protection and business secrecy requirements;
- Immediately inform the Legal Department of any inspection or investigation initiated by a public authority;
- Record and document all exchanges and actions carried out in response to an official request.

Our Commitment to Our Clients, Partners and Suppliers

Principle 1: Quality and Operational Excellence

Customer satisfaction is at the heart of our priorities. We are committed to delivering reliable, tailored services, listening carefully to our clients' needs, continuously improving our services through innovative, sustainable and value-creating solutions, while ensuring irreproachable quality in each of our interventions.

Case study

You are a branch manager and, during a meeting, a client expresses dissatisfaction with the cleaning services delivered by ATALIAN at one of their main sites. What conduct is expected from you?
You must listen carefully to the client, take note of the points raised, and ask questions to understand whether the situation is isolated or also encountered on other sites. You must propose an appropriate solution and ensure that rigorous follow-up is put in place to secure the client's full satisfaction.

Conduct to avoid

- Ignoring a client's requests or complaints, or leaving them unresolved;
- Favouring your own interests or those of your team in the solutions proposed;
- Minimising or trivialising negative feedback or client complaints;
- Handling alone, without involving a Compliance Officer, a request from a client, partner or supplier that appears contrary to a principle of the Code of Ethics.

Right reflexes

- Listen actively to the client's needs, attentively and without judgment;
- Honour commitments made to our clients, partners and suppliers;
- Aim for customer satisfaction and guarantee the quality of services delivered;
- Respond with responsiveness and professionalism, even in the event of constraints or difficulties.

Principle 2: Trust in Our Business Relationships

We build relationships with our clients, partners and suppliers based on transparency and mutual respect. We safeguard the confidentiality of their information and act with responsiveness. Trust is the cornerstone of our long-term relationships.

Case study

During an exchange, a supplier asks for information about the offer submitted by another bidder in a tender process. What should your response be?
You must refuse to disclose that confidential information, reaffirm the importance of compliance with tender rules and confidentiality, and then refocus the discussion on the supplier's questions so as to clarify their offer in relation to our needs. You must report this incident to your manager, your Compliance Officer or the Compliance Department.

Conduct to avoid

- Providing inaccurate, incomplete or biased information, whether intentionally or through negligence;
- Disclosing confidential information outside a contractual framework or without appropriate authorisation;
- Failing to escalate to management requests from clients, partners or suppliers relating to identified risks, particularly where ethical or compliance matters are involved;
- Exchanging or sharing commercially sensitive information in an inappropriate or unsecured manner.

Right reflexes

- Communicate transparently and act in good faith with clients, partners and suppliers, including in the event of difficulty, uncertainty or unforeseen circumstances;
- Build sustainable professional relationships based on mutual respect, reliability and trust;

- Ensure an appropriate level of confidentiality for exchanged information, as well as for personal data, in accordance with contractual commitments and internal rules;
- Act with responsiveness and responsibility when dealing with questions, concerns or risks raised by our clients, partners or suppliers, particularly on ethical matters.

Principle 3: Sustainability as a Performance Driver

We develop sustainable partnerships combining performance and responsibility. The integration of non-financial criteria (Environment, Social and Governance - ESG) into our commercial practices is a key lever to ensure balanced, responsible and value-creating long-term relationships.

Case study

During a negotiation, a client tells us that they want us to work with their historical supplier if we win the contract, even though that supplier is not approved by Atalian and does not appear to meet our ESG requirements. How do you respond to that request?

You must explain that it is important for ATALIAN to establish sustainable relationships with its clients, partners and suppliers. These relationships are based on a set of criteria, which are recalled in particular in our Responsible Procurement Policy. Consequently, you should acknowledge the client's need and suggest reverting with a proposal that addresses the client's need for stability while also ensuring compliance with our responsible procurement requirements.

Conduct to avoid

- Considering short-term economic performance as the sole basis of our commercial relationships;
- Ignoring, minimising or circumventing sustainability commitments made to a client;
- Accepting any commercial practice likely to damage the Group's reputation or credibility in its sustainability approach.

Right reflexes

- Ensure that the services offered, as well as the equipment, machines and products used, comply with the Group's Responsible Procurement Policy and applicable regulatory requirements;
- Understand our clients' sustainability expectations and honour the commitments made by the Atalian Group in the commercial relationship with respect to those expectations;
- Involve our clients, partners and suppliers in defining our ESG strategy through constructive dialogue, so as to identify more easily the risks and opportunities linked to our activities.

Our Commitments to Our Employees

Principle 1: A Safe and Supportive Working Environment

We place the health, safety and well-being of our employees first. We are committed to providing a safe and respectful working environment, preventing occupational risks and firmly combating all forms of violence, including psychological or physical violence.

Case study

During an internal event, you witness behaviour that could be characterised as sexual violence against a colleague. What conduct should you adopt?
You must intervene immediately to stop the situation, alert the managers or designated representatives in accordance with internal procedures, and remind those involved that this type of behaviour violates our internal policies.

On an industrial site, you notice that certain workers are not wearing personal protective equipment (PPE). What is your responsibility?
You must immediately stop the activity, remind everyone of the obligation to wear PPE, ensure that safety rules are strictly complied with before the activity resumes, and report the incident in accordance with internal procedures.

Conduct to avoid

- Remaining inactive or complacent in the face of moral or sexual harassment, intimidation, or psychological or physical violence;
- Intentionally or negligently ignoring signs of distress, overload or ill-being expressed by an employee;
- Accepting working conditions on a client site that compromise health or safety.

Right reflexes

- Comply with, and ensure compliance with, the rules, protocols and instructions that protect everyone's safety and health on our sites;
- Apply on client sites the same health, safety and prevention requirements as on our own sites;
- Support employees in difficulty, without judgment or indifference;
- Immediately report any dangerous or non-compliant situation to your line manager.

Principle 2: Valuing Diversity and Inclusion Among Our Employees

We foster an inclusive and respectful environment, valuing diversity of backgrounds, cultures and points of view, convinced that this diversity is an invaluable source of richness and innovation. We promote equal opportunities, combat all forms of discrimination, and encourage an environment in which everyone can express themselves, contribute and fully thrive.

Case study

During a meeting, an employee makes a stereotyped remark about a colleague's cultural origin. How should you react?
You must immediately remind them that such remarks are unacceptable, report the incident if necessary, and reaffirm the importance of respect and equal treatment for all.

A female employee tells you that she is repeatedly subjected to sexist remarks from a manager. What should your approach be?
You must listen with empathy, encourage the employee to report the facts formally, support her if necessary toward the Compliance Officers or Human Resources, and remind her that the Group's policy prohibits all forms of sexist violence and protects victims.

Conduct to avoid

- Intentionally excluding an employee from discussions, decisions or professional opportunities without objective justification;

- Undermining a colleague's dignity through degrading, mocking or discriminatory words or behaviour linked to their ideas, beliefs, physical or mental attributes, or ethnic, cultural or social origins;
- Hindering diversity and inclusion principles by imposing personal standards or rejecting the plurality of profiles.

Right reflexes

- Respect and value differences within your team, always seeking to make collective strength out of diversity;
- Promote gender balance, diversity and inclusion in Human Resources processes such as recruitment, career development and skills development;
- Prevent discriminatory behaviour and relational tensions.

Principle 3: Respectful and Peaceful Working Conditions

We place respect and our employees' working conditions at the heart of our commitments. We reject all forms of illegal or forced labour and guarantee respect for our employees' fundamental rights, notably freedom of association. We also ensure the protection of their personal data.

Case study

A manager asks you to work regularly beyond your contractual hours without compensation. What conduct should you adopt?
You must assert your rights, refuse any illegal or unpaid work, and report the situation to Human Resources.

During a discussion in which you raise irregularities relating to working conditions on a site, your supervisor threatens to review your assignment. What conduct should you adopt?
The right to report concerns is recognised for everyone and protected against any retaliation. You must report any attempt to conceal irregularities relating to working conditions to Human Resources or the Compliance Department, as well as the pressure exerted on your duties.

Conduct to avoid

- Using our expertise or position to impose domination, humiliate or hinder another person's progress;
- Providing incomplete or biased information, whether intentionally or through negligence;
- Concealing any infringement of our employees' fundamental rights, whether intentional or through negligence, internally or on a client site.

Right reflexes

- Practice active listening and open dialogue to create a climate of trust;
- Share our knowledge, resources and expertise in a supportive manner;
- Act with respect, fairness and solidarity on a daily basis;
- Protect employees' personal data by using it only for the intended purpose and in compliance with security and confidentiality rules.

Our Commitment to Society

Principle 1: Respect for Human Rights in the Value Chain

We actively ensure respect for human rights, which are an essential foundation of all our activities and of our value chain. This involves assessing the risks of violations and implementing preventive and corrective measures to ensure that our activities comply with our duty of vigilance, notably with regard to our suppliers.

Case study

You discover that a subcontractor employs children. What conduct should you adopt?
You must refuse to condone such practices, immediately alert your manager or the Compliance Department, and request that an audit be carried out as soon as possible.

A client asks you to use a subcontractor that potentially relies on forced labour. What is the appropriate response?
You must remind the client of our commitments regarding human rights and that we govern the activities of our subcontractors through compliance with our principles. You should state that you must discuss the request internally and alert your manager and the Compliance Department for immediate verification of that subcontractor.

Conduct to avoid

- Tolerating or concealing violations of social rights (forced labour, child labour, undignified conditions), even if requested by a client or seemingly more profitable for the company;
- Making comments or adopting behaviour that undermines dignity or equal treatment;
- Concealing a breach of our vigilance plan, including where caused by a supplier or partner.

Right reflexes

- Comply with laws and standards relating to human rights and fundamental freedoms, in particular with regard to the employees of our suppliers and subcontractors;
- Ensure that our suppliers sign our Supplier Code of Conduct and comply with it throughout the procurement contract;
- Promote a culture of responsibility and positive impact in the professional environment;
- Ensure awareness of, and compliance with, our Responsible Procurement Policy.

Principle 2: Reducing Our Environmental Impact and Preserving the Environment

- We act responsibly by integrating the reduction of our environmental impact, including the reduction of our greenhouse gas emissions, across our entire value chain into each of our decisions.
- We work to control our water and energy consumption, optimise waste management, and develop eco-responsible solutions across all our services.
- We work with our suppliers to identify solutions enabling us to meet our environmental impact reduction targets.
- We are committed to supporting our clients in their own decarbonisation efforts.

Case study

During an internal audit, you find that certain waste management procedures do not comply with ISO 14001 requirements (lack of traceability, non-compliance in sorting or storage). What steps should you follow?
You must immediately report the non-compliance to your manager, propose corrective actions (implementation of monitoring, team training, improved sorting), and ensure that practices are aligned with ISO 14001 standards and the Group's environmental policy.

You notice that your team systematically prints all working documents, even when digital versions would suffice. What attitude should you adopt?
You must promote the use of digital solutions, remind colleagues of eco-responsible best practices, and encourage the reduction of paper waste.

Conduct to avoid

- Engaging in wasteful practices, failing to sort waste, or rejecting eco-responsible solutions;
- Concealing or justifying any intentional action by one of our employees or suppliers that runs counter to our objectives for reducing environmental impact.

Right reflexes

- Prioritize eco-responsible practices;
- Understand our clients' expectations regarding reduction of their environmental impact and propose solutions to meet those expectations;
- Refer to our CSR Charter and our environmental policy in case of doubt.

Principle 3: Strong Societal Commitment Within Our Communities

We strengthen our ties with local communities by supporting local engagement and contributing to local economic development. Patronage, donations and, at times, sponsorship actions enable us to maintain strong and meaningful local roots.

Case study

You must organize an internal seminar and hesitate between an international caterer and a local company. Which option should you prioritize?
You should prioritize the local provider in order to support the local economy, strengthen ties with the community and showcase local expertise.

The company proposes a volunteer day to renovate a public space. Some employees believe they already have too much to do with their daily tasks. What position should the company adopt?
The company should highlight the importance of community engagement, actively participate in the local initiative, and encourage employees to get involved, always on a voluntary basis, because this approach contributes to the common good and strengthens the company's social responsibility.

Conduct to avoid

- Hindering the implementation of social or environmental initiatives through lack of interest or in order to preserve personal interests;
- Ignoring the societal impacts of professional decisions by focusing only on economic criteria.

Right reflexes

- Actively participate in local actions that strengthen ties with communities;
- Work with stakeholders to support social and environmental initiatives.

The Right to Ask Questions and to Report Concerns

We encourage everyone to speak freely, refuse anything contrary to our values, and report any breach of our Code of Ethics or internal policies.

In the event of an identified breach, we encourage everyone to report it to their manager, their Human Resources Manager, their Compliance Officer, or via our professional whistleblowing system: https://ethicslineatalian.com/

Sometimes it is difficult to know what may or may not be accepted, done or not done. In order to help everyone reflect and make the best possible decision depending on the context, we invite you to assess the situation against the following five questions:

- Legality: Is it compliant with the law?
- Compliance: Is it compliant with internal policies / the Code of Ethics?
- Respect: Does it respect the dignity of people, communities and the planet?
- Transparency: Would you be comfortable if this decision were made public?
- Integrity: Is it honest and fair?

If the answer is "No" to any of these questions, abstain.

ATALIAN: A Committed and Engaged Group

The Atalian Group has been a committed actor since 2012 through its accession to the United Nations Global Compact, and since 2015 through compliance with 9 of the 17 Sustainable Development Goals concerning human rights and labour, the environment and anti-corruption.

Faithful to its commitments towards its stakeholders, the Atalian Group is involved in initiatives that enable companies to contribute to the emergence of sustainable business models.

As such, the Group is a member of, and signatory to, the following bodies, charters and initiatives:

- The United Nations Global Compact and the France Network;
- The Global Compact's "Caring for Climate" initiative;
- The Transparency International France Business Forum;
- The Cercle Ethique des Affaires;
- The Diversity Charter of the "Entreprises pour la Cite" network.

In order to make its commitments tangible, the Atalian Group has defined policies setting out the rules to be complied with, including in particular:

- Anti-Corruption Code of Conduct;
- Compliance Governance Policy;
- Whistleblowing Intake and Case Management Policy;
- CSR Charter;
- Human Resources and Social Policy;
- Environmental Policy.

In addition, each year, by monitoring key indicators, the Atalian Group ensures that:

- New employees sign the Code of Ethics;
- Exposed staff complete the mandatory annual training as defined by the Group Ethics and Compliance Committee;
- Reports received through the professional whistleblowing system are assessed within 15 days and are handled in compliance with the internal policies in force.

Lastly, in a spirit of transparency with its ecosystem, the Atalian Group ensures that it is assessed or certified by recognised bodies / standards:

- EcoVadis assessment;
- The non-profit organisation CDP;
- ISO 9001, ISO 14001, ISO 45001 and MASE certifications, or equivalent.

Key Definitions

Corruption:
Corruption means the act of offering, giving, receiving or soliciting something of value in order to improperly influence the action of a person in a position of authority. It often involves illegal or unethical practices and may include active corruption (offering or giving an advantage) and passive corruption (receiving an advantage).

Fraud:
Fraud is a deliberate act or omission intended to deceive, mislead or trick a person or entity in order to obtain a financial or personal gain or to cause a loss to another person. It generally involves the manipulation or alteration of information, false statements or concealment of the truth.

Anti-competitive practices:
Anti-competitive practices are practices that reduce or restrict competition in a market. This may include price-fixing, market allocation, abusive monopoly practices, or other activities that hinder fairness and free competition.

Harassment:
Harassment refers to unwanted, offensive or threatening behaviour that creates an intimidating, hostile or humiliating working environment. It may be physical, verbal, psychological or sexual and may occur in various social or professional contexts.

Discrimination:
Discrimination is the unfair or prejudicial treatment of individuals or groups on the basis of characteristics such as race, gender, age, religion, sexual orientation, disability, etc. It often takes the form of exclusion, restriction or preference based on those characteristics, thereby limiting equal opportunity.

Illegal labour:
Illegal labour includes any form of employment that breaches labour laws. This may include child labour, forced labour, undeclared work, or employment of workers without the appropriate legal rights.

Confidentiality:
Confidentiality refers to the obligation to keep certain information secret or private. It involves protecting professional or business information from unauthorised disclosure or access.

Personal data:
Personal data means any data that makes it possible to identify a natural person. This may include raw data, such as a person's surname, first name or gender, as well as documents such as health insurance cards or identity documents.

Duty of vigilance:
The duty of vigilance is a legal obligation imposed on certain companies in France, aimed at preventing and mitigating risks of serious harm to human rights, health and safety, and the environment, in particular through the implementation of a structured vigilance plan that is regularly updated and published.

Vigilance obligation:
The vigilance obligation requires companies to verify the administrative regularity of their business partners' situations in order to ensure that they comply with their social obligations.

Anti-money laundering and counter-terrorist financing:
Anti-Money Laundering and Counter-Terrorist Financing (AML-CTF) refers to all laws, regulations, measures and tools used to identify and limit the techniques and means used to launder money and finance criminal enterprises.