

Anti Bribery Policy

Green Transfo SAS



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Green Transfo SAS is committed to conducting all business activities with integrity and in compliance with all applicable laws and regulations, including those relating to bribery and corruption.

Bribery and corruption have a damaging effect on organizations, economies, and society as a whole. They undermine trust, distort fair competition, and can lead to significant legal and reputational consequences for companies. Our company is committed to conducting business with integrity and in compliance with all applicable anti-bribery laws and regulations. We take a zero-tolerance approach to bribery and expect all employees, officers, and directors to act with the highest ethical standards in all business dealings.

This anti-bribery policy sets out the company's stance on bribery and provides guidance on what constitutes bribery and prohibited conduct. The policy covers gifts and hospitality, due diligence, reporting and investigation, training and awareness, and penalties for violations. It is the responsibility of all employees, officers, and directors to read, understand, and abide by this policy and to report any suspected or actual violations to the company's management. **Green Transfo SAS** will take appropriate action to prevent, detect, and address any violations of this policy and relevant laws and regulations.

A- Definition of Bribery:

Bribery refers to the offering, giving, receiving, or soliciting of any item of value as a means of influencing the actions of an individual holding a public or legal position, or of inducing an individual to do or omit to do any action in violation of their legal or public duties.

B- Prohibited Conduct:

All employees, officers, and directors of the company are prohibited from offering, giving, soliciting, or accepting bribes in any form, directly or indirectly, to or from any person or entity, public or private, in connection with the company's business.

C- Gifts and Hospitality:

The provision of gifts and hospitality to or from third parties must not be excessive in value, frequency, or nature and must be in accordance with the company's policies and procedures.

D- Due Diligence:

The company shall implement due diligence procedures to assess the bribery risks associated with any third-party representative, agent, or business partner.

E- Reporting and Investigation:

Any suspected or actual violation of this policy must be reported to the company's management immediately, and the company shall take appropriate action to investigate and address any confirmed violation.

F- Training and Awareness:

The company shall provide regular training and awareness programs to all employees, officers, and directors on this policy and related laws and regulations.

G- Penalties:

Any violation of this policy may result in disciplinary action, up to and including termination of employment or engagement, as well as legal and financial penalties.