

2025 edition

Anticorruption **Code of conduct**

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Message from the Top Management



Arthur DREYFUSS

Chairman and CEO of Altice France



Mathieu COCQ

Chairman and CEO of SFR

“ Corruption and influence peddling are scourges that affect all sectors of activity and all countries. As managers, we have a particular responsibility in the fight against these practices, the failure to do so could have serious consequences for our activity, our reputation and our employees. This is why we affirm a zero-tolerance policy towards any attempt or act of corruption or influence peddling.

This Anticorruption Code of Conduct enables us all to understand the risks associated with these practices and the rules established to protect us from them. We are counting on everyone's commitment to respect this Code and preserve the integrity of the Group. ”

“ The fight against corruption and influence peddling is essential to guaranteeing the Group's integrity, competitiveness and reputation. With this in mind, we are firmly committed to fighting against all forms of corruption and influence peddling in all our activities. As members of the SFR Executive Management Committee, we have a responsibility to embody and disseminate the Group's fundamental principles of ethics to promote business conduct in accordance with applicable regulations.

Respect for and application of the Anticorruption Code of Conduct implemented within SFR are at the heart of this commitment. ”

**Altice France/SFR
Executive Committee**



**Mehdi
BOUDAH**
Chief Operators Officer



**Pierre
CLEMENT**
Chief Consumer and
Business Officer



**Laurent
HALIMI**
General Secretary



**Benjamin
HAZIZA**
Chief Financial Officer



**Hélène
LEDUC-FONNESU**
Head of Human
Resources



**Mathieu
LE RENARD**
Chief Transformation
Officer



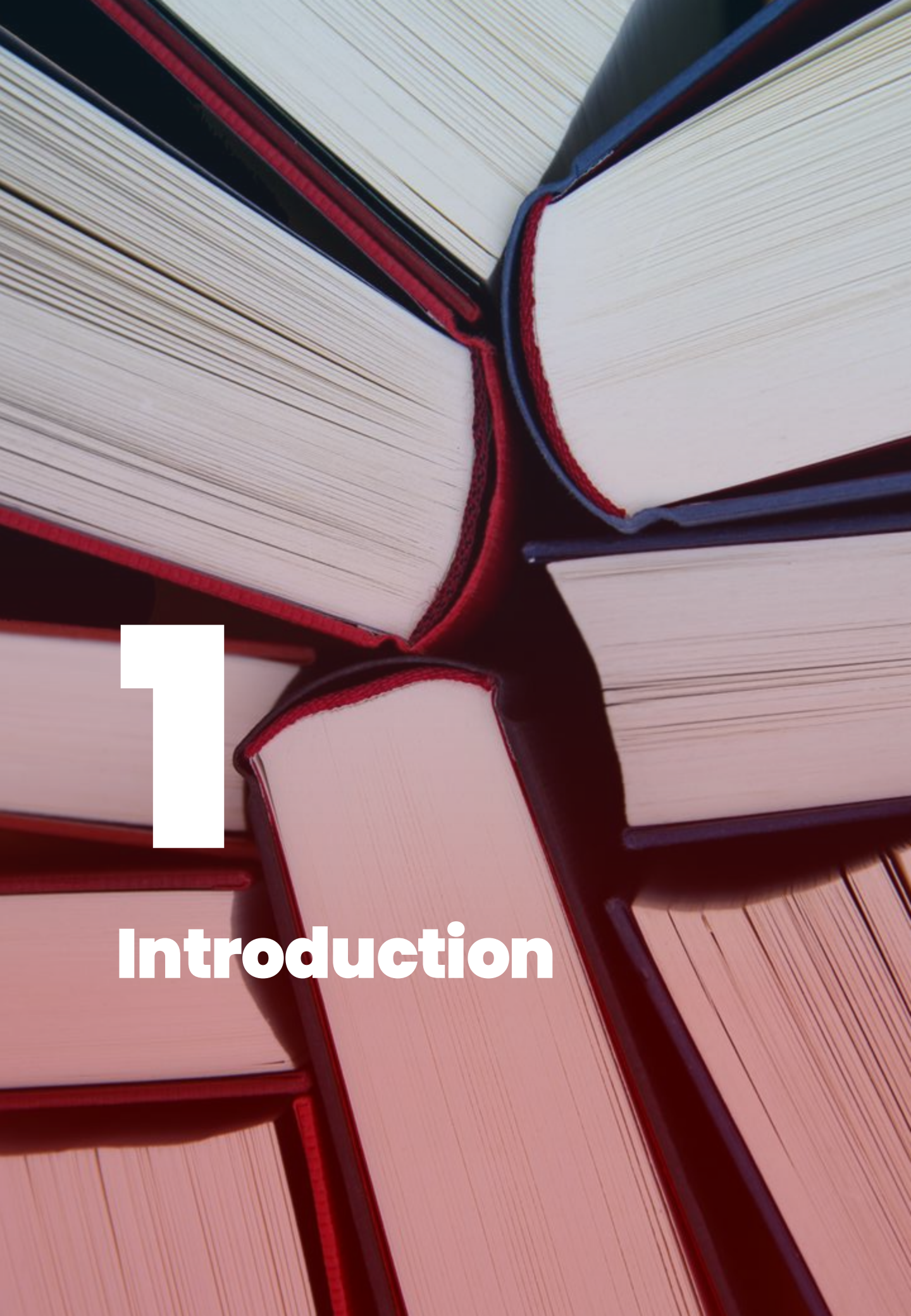
**Pascale
MONTROCHER**
Chief Information Officer



**Eric
PRADEAU**
Chief Operating Officer



**Olivier
TAILFER**
Chief Network Officer



1

Introduction

Purpose of this Code of Conduct

The purpose of this Anticorruption Code of Conduct is to formalize and publicize the principles, applicable rules and prohibitions in the fight against corruption. It provides practical examples, some of which are taken from the Group's corruption risk mapping.

This Code is part of the Group's Anticorruption Program, which aims to prevent, detect and control the risks of corruption and influence peddling. It meets the requirements of the French "Sapin II" Act¹, as well as extraterritorial regulations such as the Foreign Corrupt Practices Act² and the United Kingdom Bribery Act³.

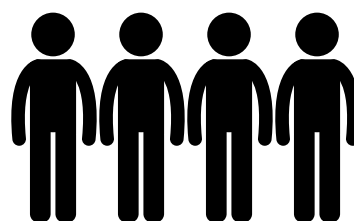
It expresses the unreserved commitment of the Group and its representatives to the fight against corruption and influence peddling and may also be usefully communicated to third parties.

Scope

To whom does the Anticorruption Code of Conduct apply?



SFR executives and employees



Suppliers, sub-contractors, partners, service providers, etc.

The Anticorruption Code of Conduct applies to all SFR managers and employees, as well as to third parties (suppliers, subcontractors, partners and service providers, etc.) acting on behalf of the Group or with whom it has a business relationship. It is appended to the Internal Rules of the companies concerned.

This Code is the foundation for several other policies and procedures that are referenced and should also be followed. These provide the rules to be followed for each of the topics covered by the Anticorruption Program.

¹ Law 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernization of economic life.

² 1977 US federal law against foreign bribery of public officials.

³ UK Law of 1 July 2011 on the prevention and repression of corruption.

Implementation of the Anticorruption Code of Conduct

The Anticorruption Code of Conduct is the responsibility of the Compliance Department. It is updated in line with changes in the context and regulations, the results of the Group's corruption risk mapping and potential incidents detected.



Legal and regulatory framework

France's « Sapin II » Act

Law 2016-1691 of 9 December 2016, also known as the Sapin 2 Act, aims to strengthen transparency, the fight against corruption and the modernization of economic life, and requires French companies ⁴ to implement a program to prevent and detect corruption and influence peddling.

In the event of non-compliance with this law, the French Anticorruption Agency (AFA) may impose the following sanctions:



€1 MILLION fine for the Group



€200 000 fine for the company's CEO



Publication of the decision in the press



Monitoring by AFA

⁴ Companies with more than 500 employees and a turnover of more than €100 million.

Laws with extraterritorial reach

Many jurisdictions have adopted laws with extraterritorial application, enabling corruption to be prosecuted even if committed outside their borders. These include laws that may apply to our activities:



The **Foreign Corrupt Practices Act** (FCPA) in the United States applies to companies with links to the United States, commonly known as US Nexus⁵, covering acts of corruption involving foreign public officials.



The **United Kingdom Bribery Act** (UKBA) covers both public and private bribery, regardless of where the offence is committed, as long as it involves a person or entity with a substantial connection to the United Kingdom.

Cumulative effects of several laws

Companies often must deal with a complex legislative framework where several laws may apply simultaneously. This means that the same act of corruption can be prosecuted in several different jurisdictions, each applying its own rules and penalties.



⁵ A link to the United States. For example: use of US currency to pay for a service, involvement of a person with US nationality or green card in the negotiation or transaction, sending an email from US territory, etc.



2

Prohibited situations

Act of corruption

Act of corruption consists of offering, directly or indirectly, an advantage of any kind to a third party, with the aim of inducing that party to perform or refrain from performing an act in favor of the person offering the advantage. This is known as an 'undue advantage'. This can include gifts, invitations, preferential treatment, or even benefits in kind in exchange for something in return, such as obtaining a public contract, sharing confidential information, a tax advantage, or entering a contract.

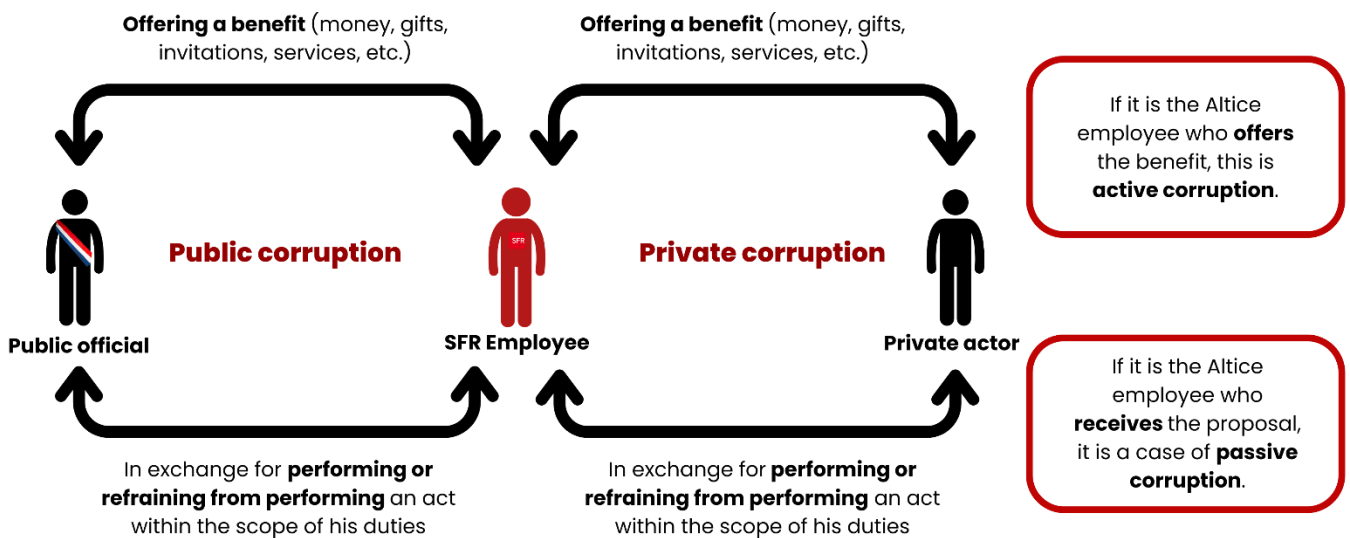
There are two types of corruption: **public** corruption and **private** corruption:

- **Public corruption:** situations where a public official is involved in an act of corruption.
- **Private corruption:** situations where private actors, such as company directors, consultants or commercial agents, offer or accept undue advantages to influence decisions.

In the context of these definitions, it is essential to distinguish between **active** and **passive** corruption:

- **Active corruption:** refers to the person who offers the undue advantage.
- **Passive corruption:** refers to the person who receives or solicits the advantage. It is important for the person involved in an act of passive bribery to keep a record of their refusal at the time of the offer.

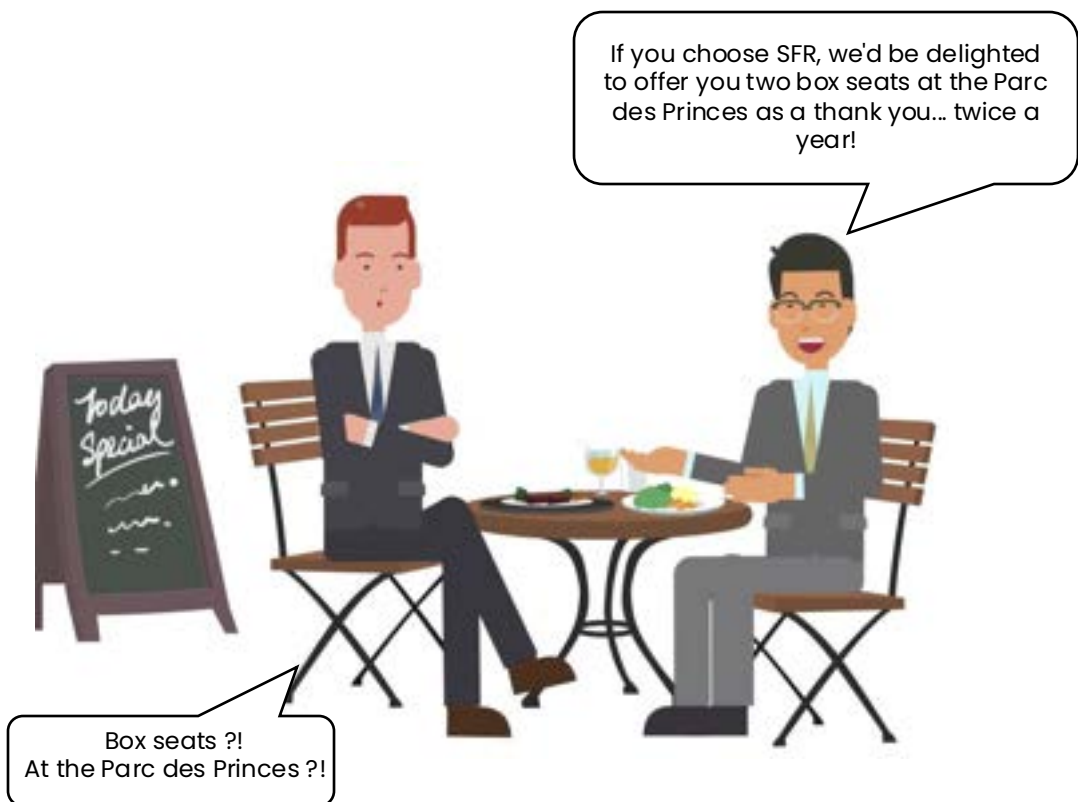
The Group is committed to a policy of **zero tolerance** of corruption in all its forms. Employees must therefore be vigilant.



⁶ Any person holding public authority (e.g. mayor, prefect, police officer, customs officer, civil servant) or representing state authority.

Case study: High speed corruption

A mayor intends to deploy fiber-optic infrastructure in the town, but he's not sure which operator to choose. An SFR sales engineer offered to meet him for lunch to present the company's offerings. Knowing that the mayor was a fervent football supporter, the sales representative offered to give him a box seat at the Parc des Princes twice a year if he chose SFR.



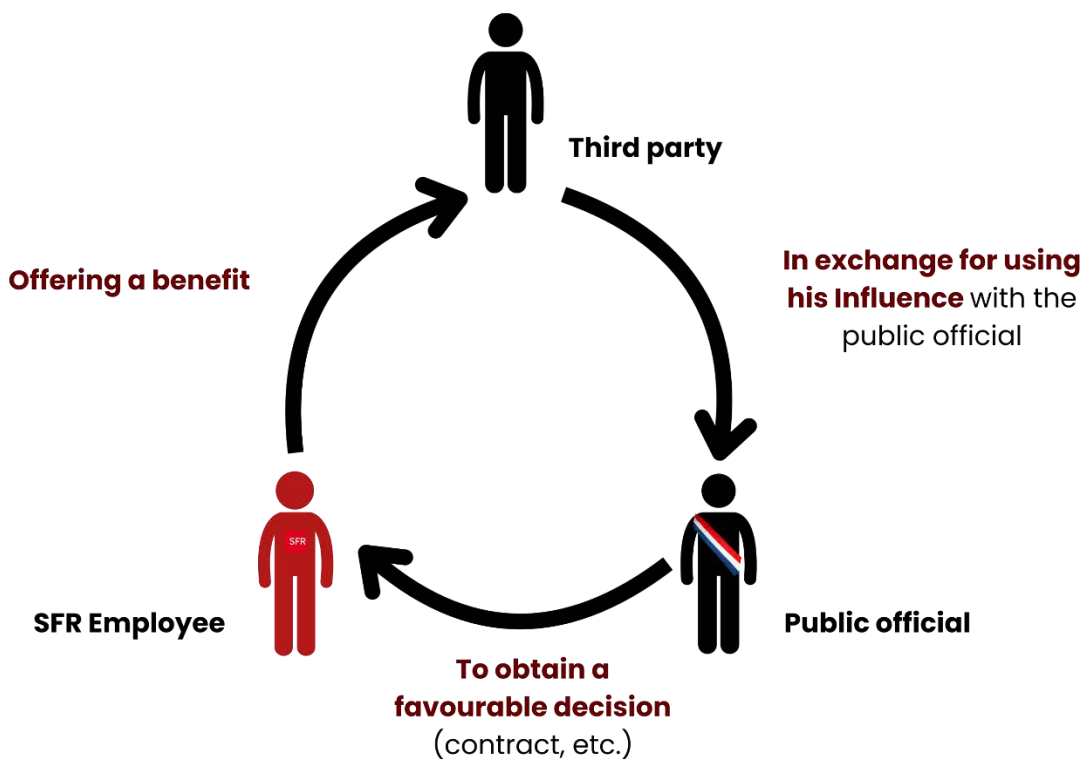
This is prohibited.

In this case, the employee invited the mayor to lunch to obtain a favorable decision by offering him box seats at the Parc des Princes. This is an act of public corruption because a public official is involved.

The same situation with a private commercial service provider (or prospect) is prohibited.

Influence peddling

Influence peddling occurs when a person offers an advantage of any kind directly to a third party so that the latter uses his or her influence with a public official to ensure that the latter takes a decision in favor of the person who initially offered the undue advantage.



Case study: Private connexion

SFR is participating in a call for tenders for a public contract to install a 5G network in a local authority. One of SFR's project managers realized that he knew the mayor's cousin personally. He decided to give him a call to see if he could help in any way to get his uncle to favor his application. To persuade him, he offered to give him the latest smartphone to be released, which he had received for testing from a supplier.



This is prohibited.

By contacting the mayor's cousin and offering him an advantage to get him to intervene with a public official, the employee had committed an act of influence peddling. Although the act took the form of a proposal, the law also prohibits attempted influence peddling.

A pair of brass scales of justice is shown on a wooden surface. The scales are slightly off-balance, with the right pan being lower. In the background, there are several white papers or documents. The lighting is warm, and the overall tone is reddish-brown.

3

Sanctions

Under French law, all those involved in attempting or committing an act of corruption or influence peddling are liable to criminal penalties.

For individuals

In the case of **private corruption**: up to 5 years' imprisonment and a fine of €500,000 (or double the proceeds of the offence).

In the case of **public corruption**: up to 10 years' imprisonment and a fine of €1 million (or twice the amount of the proceeds of the offence)⁷.

For legal entities

As a legal entity, the Group may also be held liable for up to five times the amount of the fines imposed on individuals, or up to ten times the amount of the proceeds of the offence.

Additional penalties may accompany these criminal sanctions, in particular:

- Proceedings for damages against the company that attempted or carried out an act of corruption or influence peddling.
- Invalidation of contracts concluded illegally.
- A ban on bidding for public contracts.
- Damage to the Group's image and reputation.
- Supervision by the authorities⁸.

Disciplinary sanctions

As the Group has a zero-tolerance policy, any violation of the provisions of this Anticorruption Code of Conduct may result in disciplinary action, up to and including dismissal. These sanctions and their terms and conditions are provided for and described in the Internal Regulations and will be taken in compliance with the rights and guarantees applicable to employees.

⁷ Articles 432-11 and 433-1 of the French Penal Code.

⁸ Examples of regulatory authorities include the French Anticorruption Agency (AFA) and the US Department of Justice (DoJ).

A man with curly hair and glasses, wearing a brown sweater, and a woman with long blonde hair, wearing a brown blouse, are standing in an office and looking at a laptop on a desk. The background shows a hallway with a doorway.

4

Risk situations

4.1 – Inappropriate advantages

Inappropriate advantages include any form of gift, invitation or other advantage likely to influence decision-making in the context of professional activities. These practices are strictly forbidden and regulated to avoid any risk of corruption or conflict of interest.

Gifts and invitations

Definition

Gifts and invitations are benefits offered in a professional context, such as material goods, meals or invitations to cultural or sporting events. Although they can be used to strengthen business relationships, they can sometimes be perceived as a means of influencing a decision or favoring a business relationship.

Group rules

The Group authorizes the exchange of gifts or invitations in the context of professional relations, provided that such exchanges comply with the Group's ethical principles.

To provide a framework for these practices, specific thresholds have been set. If these thresholds are exceeded, prior authorization from the employee's N+1 is required, if this is done on a one-off basis and does not jeopardize the professional integrity of the employee or the Group.

Employees are required to:

- **Declare** any gifts or invitations received or offered, whether accepted or not, regardless of their value. A **register** has been set up to record all gifts and invitations, to ensure continuous monitoring and transparency within the Group.
- **Not to offer or accept gifts or invitations** in the context of a **current or future commercial negotiation or call for tenders involving the Group, regardless of whether the employee's department is directly involved**, or where acceptance of the gift or invitation could be interpreted as a means of obtaining a favor.
- **Never accept any sum of money** in any form whatsoever (cash, gift vouchers, etc.).
- **Never directly or indirectly solicit** gifts or invitations in the context of a professional relationship.
- **Refuse any gift or invitation** that is not linked to a legitimate business relationship.
- **Ensure that any gift or invitation complies with applicable laws** and the Group's internal policies.
- **Consider the frequency of gifts and invitations.** Even if a gift or invitation respects the defined thresholds, it may become inappropriate if it is offered on a regular basis. Exchanges should remain occasional and should not arouse suspicion about an employee's integrity.

Case study: A questionable invitation

A supplier with whom SFR has a commercial relationship invites a whole team of buyers to an end-of-year dinner. The invitation indicates a semi-gastronomic restaurant, and the supplier specifies that the cost is largely reduced by the number of guests.

SFR regularly calls for tenders from this supplier, but as this is not the case for the purchasing department concerned, the procurement team decides to accept, without informing their line manager - after all, it's an end-of-year dinner!



This is prohibited.

The employees concerned should have referred to the rules in place on gifts and invitations and obtained their manager's agreement.



Documentation

Policy on gifts and invitations

Case study : Questionable discount

While negotiating a contract with a customer, an SFR sales representative offered to give him the benefit of employee discounts - he wasn't going to use it for himself and thought it might be a good commercial gesture to make it easier to sign the contract.



This is prohibited.

SFR employees must not under any circumstances be tempted to influence a third party by offering an advantage. In this case, the employee must not interfere in the negotiation by using his discount. Furthermore, SFR reminds that employee discounts must not be shared with third parties.



Documentation

Policy on gifts and invitations



Business travel and expense accounts

Definition

Business travel and expense accounts cover business travel and expenses incurred in connection with business activities. However, they may, in some cases, be used to influence a commercial decision if the terms of such travel or expenses do not comply with Group Policy.

Group rules

- All travel expenses must be **reasonable** and **strictly related to business activities**.
- The Group implements a **clear framework** defining what is acceptable in terms of reimbursement of expenses, in particular accommodation, catering and travel costs.
- Employees must provide **detailed receipts** for each expense incurred during business travel.
- Any attempt to exaggerate or falsify expense claims is **strictly prohibited** and may result in disciplinary action.

Case study : Expense for two

During a business trip, an SFR employee decided to take advantage of the opportunity to be accompanied by a potential customer. He included in his expense account not only his own travel and accommodation expenses, but also those of the potential client, without indicating that the expense was for two people. He knows that the expense account for the potential customer will not be validated, as the Group's gifts and invitations policy does not allow the travel expenses of potential customers to be covered.



This is prohibited.

The Group's travel and expense policy stipulates that only expenses that are strictly necessary and personal to the employee's professional activities are eligible for reimbursement. By covering the potential customer's transport and accommodation costs, the employee is offering an unfair advantage with the aim of positively influencing a business relationship.



Documentation

Travel and expense Policy

Facilitation payments

Definition

Facilitation payments are unofficial payments, generally of small amounts, made to speed up or guarantee an administrative procedure or to obtain a service to which the company is entitled (e.g. speeding up customs clearance). Although often perceived as common practice in certain countries, these payments are a form of corruption.

Group rules

The Group adopts a zero-tolerance policy towards facilitation payments. Such payments, whether made directly or via intermediaries, are strictly prohibited, even in countries where local law allows them.

Any employee faced with a request for a facilitation payment must:

- **Refuse the request immediately**, explaining that this is contrary to Group policy, and keep a record of this refusal where possible.
- **Inform his/her line manager** or the Compliance Department as soon as possible so that appropriate measures can be taken.



Case study: Express customs

SFR obtains its supplies from a supplier outside the European Union. The supplier told the employee in charge of the order that the goods were being held up at customs, but that it was possible to speed up the process by paying €50 in cash to customs officials. The employee didn't think the amount was excessive and, moreover, the delay in the delivery of the goods could have had a major impact on the provision of services to customers. He therefore accepted the supplier's proposal.



This is prohibited.

The law prohibits the practice of paying small sums in cash to speed up administrative procedures.

4.2 – Conflicts and representation of interests

Conflicts of interest and representation of interest refer to situations where an employee's personal interests may compromise the objectivity and impartiality required in the performance of his or her duties. The Group has implemented strict rules to identify, declare and manage these situations to preserve the integrity of its activities and prevent any risk of infringement.



Conflict of interests

Definition

A conflict of interest refers to any situation in which an employee's position within the Group interferes with his or her personal interests in such a way that this interference may influence or appear to influence the impartial and objective performance of his or her duties.

This may involve the employee's personal interests, but also those of people close to him or her (family, friends, spouse, etc.).

There are many situations in which an employee may be faced with a conflict of interest, for example when being recruited, when carrying out activities outside the Group, when holding a political office, etc.

Particular attention needs to be paid to the occurrence of conflicts of interest, as they may give rise to situations that are contrary to the law (fraud, corruption, anti-competitive practices, etc.).

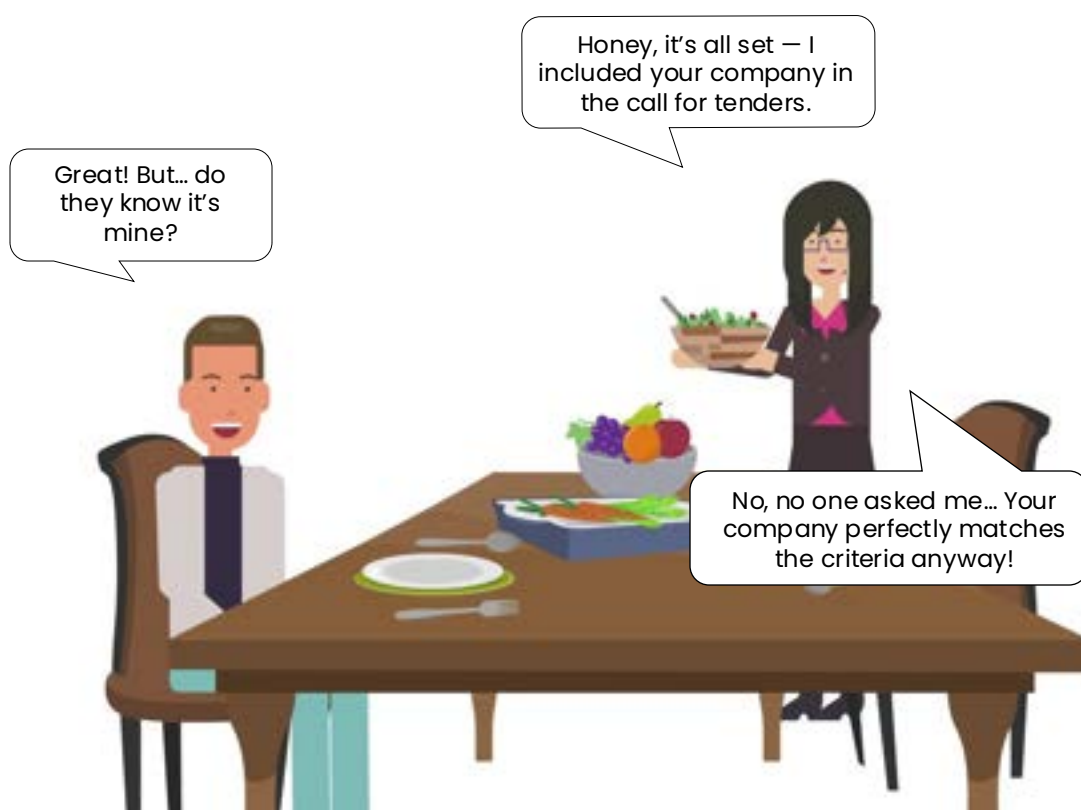
Group rules

As soon as a potential or actual conflict of interest arises, employees are advised to act with integrity and loyalty by declaring the situation. To do so:

- The employee must complete the **conflict-of-interest declaration form** (available on the 'Anti-corruption' intranet page under the 'Conflict of interest' tab) and send it to the recipient of his/her choice (manager, HR or Compliance Department).
- The conflict of interest will be assessed by the recipient to determine whether **it is a proven conflict. Remedial measures** will be put in place in the event of a proven conflict.
- A **declared conflict of interest cannot be sanctioned**. The employee must keep a record of this declaration and of the remedial measures adopted.
- In case of any doubt, the employee is invited to contact **the Compliance Department** (DirectionConformité@sfr.com).

Case study: The next door call

SFR is about to launch a call for tenders for a service provider. A member of staff in charge of the call for tenders suggested including a service provider who, at first glance, met the specifications. However, she did not mention to her manager or to the Compliance Department that the head of the company was her husband.



This is risky.

Having a stake in the choice of a service provider can be risky if there are family or friendly ties. The employee should have informed her manager or the Compliance Department of the situation so that a decision could have been taken that would have avoided the conflict of interest.



In practice

- Policy on prevention of conflict of interest
- Procedure for managing conflict of interest

Lobbying

Definition

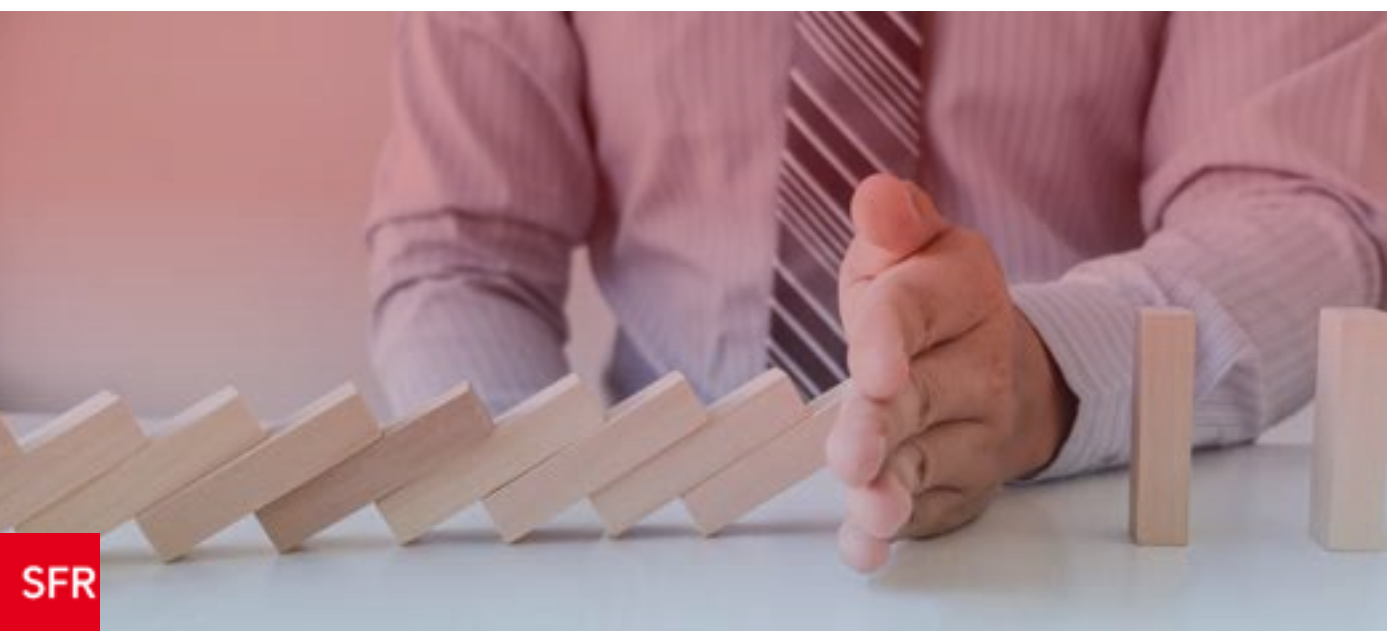
Lobbying (or interest representation) is an activity carried out on a principal or regular basis to influence public decisions that have an impact on the Group's activities.

The lobbyist acts as an intermediary between the private sector and public decision-makers to influence the development of public policy in favor of the Group. However, there is a risk that the interest representative may attempt to influence the public official inappropriately by offering undue advantages (gifts, sums of money, etc.).

Groupe rules

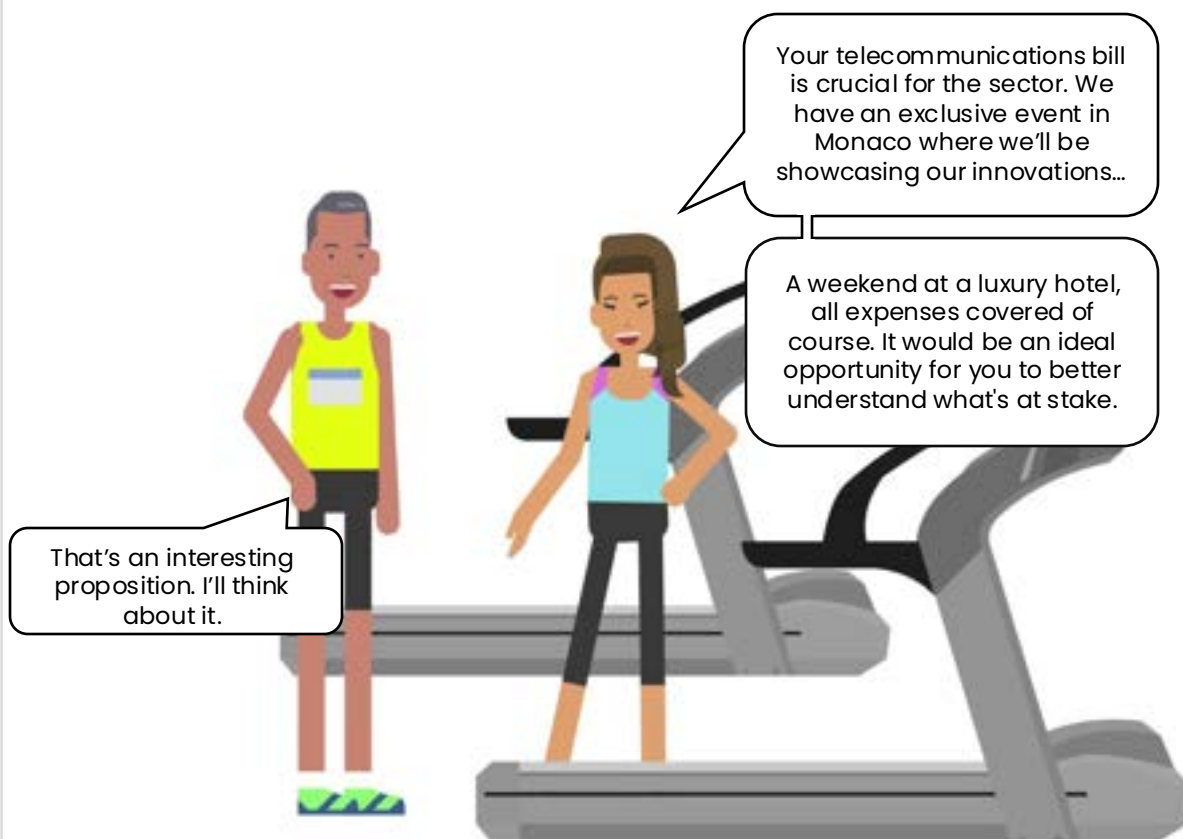
As soon as a potential or proven conflict of interest arises, employees are advised to act with integrity and loyalty by declaring their situation. To do so:

- SFR ensures that lobbying activities comply with ethical obligations and the principles of transparency.
- Interest representatives must not offer and/or accept undue advantages to obtain a favorable decision to the Group.
- Each lobbyist must act in accordance with the laws in force.
- Each lobbyist must declare any potential or actual conflict of interest.



Case study: The luxury of convincing

An SFR Director learns that a Member of Parliament oversees introducing a bill on telecommunications regulation. During an informal occasion, he offers to invite him to an exclusive event in Monaco, where SFR will present its new technologies, with a weekend in a luxury hotel offered for the occasion.



It is risky.

The employee could be accused of trying to influence the parliamentarian's decisions in SFR's favor and, if so, the integrity of the Group and its employees would be called into question.



In practice

Policy on lobbying activities

4.3 – Influence and public responsibility

The Group engages in donations, patronage and sponsorship. If not properly supervised, these actions may represent a risk of corruption or conflict of interest.

Donations and patronage

Definition

Patronage refers to financial, skills or material support given to an organization carrying out non-profit activities, without seeking direct financial compensation.

Donations allow a sum of money, equipment or services to be given for charitable purposes, without any direct counterpart on the part of the beneficiary or financial compensation.

Donation and patronage activities can represent a risk of corruption if they are used to influence a decision linked to the Group.

Group rules

Fondation SFR

Created in 2006, the Foundation SFR works to promote the digital inclusion and professional success of young people.

Through a triple sponsorship (financial, skills and in-kind), it activates the levers to contribute to building a fairer and more united world.

Acting in favor of digital inclusion for over 10 years, the Foundation SFR ensures that the development of digital technology benefits everyone.

The professional success of young people, more specifically those from modest backgrounds, is another cause close to its heart.

To offer them prospects for the future, the Foundation SFR supports projects designed to ensure their professional integration, which is the key to their social integration.

- Donation and patronage activities must pursue a **legitimate objective** and must never **be carried out with the aim of obtaining an undue advantage or influencing a decision.**
- The beneficiary entity must have undergone a **compliance analysis** (verification of the integrity of third parties) and a verification relating to the existence of a conflict of interest.
- All contributions must be made in a **collegial manner**, formalized in writing and recorded in the **accounting records** in a transparent manner.
- All contributions must **be monitored** to ensure that they are achieved.

Case study: Interested generosity

SFR is participating in a call for tenders organized by a local authority. The mayor of the municipality suggested that the Group could facilitate its application by contributing to a local association that helps young people find employment. The employee in charge of the project agreed to submit it to SFR's donations and patronage activities, thinking that in the end it was a good thing to do and that there was no risk involved, since the funding would go to an association and not to an individual.



This is prohibited.

SFR prohibits any instrumentalization or abusive use of sponsorship actions. In this case, even if it is for a good cause, it is forbidden to agree to provide a service to obtain a favorable decision.



In practice

Donations and patronage Policy



Sponsoring

Definition

Sponsorship allows a company to contribute financially and/or materially to a social, cultural or sporting activity with the aim of obtaining a direct benefit in the form of increased visibility for the company's values and an enhanced reputation.

Sponsorship activities can represent a risk of corruption if they are used with the aim of influencing decision-making related to the Group.

Group rules

- Sponsorship activities must **never be carried out with the aim of obtaining an undue advantage or influencing a decision for the benefit of the Group.**
- The beneficiary entity must have undergone a **compliance analysis** (verification of the integrity of third parties) and a verification of the existence of a **conflict of interest.**
- Sponsorship activities must be undertaken **collectively**, be **formalized** in writing and recorded transparently in the **accounting records.**
- Sponsorship activities must be **monitored** to ensure that they are achieved.

Case study: Win-win?

SFR is taking part in a call for tenders organized by a municipality. The mayor of the municipality suggests that it would make the Group's application easier if it sponsored the local rugby club. The employee in charge of the file agrees to submit the project to the competent Department, thinking that it is a good deed and that it does not present a risk, since the funding goes to a sports association and not to an individual. What's more, it will be good publicity for SFR, so it's a win-win situation.



This is prohibited.

Sponsorship activities must not be a consideration for the provision of a service or the award of a public contract. In this case, the employee must inform his manager and the Compliance Department to formulate a negative response to the mayor's proposal.



In practice

Sponsorship Policy



Activities and political contributions

Definition

Political activities are carried out with the aim of supporting a candidate or a political party, or to hold elected office.

Political contributions refer to any contribution, financial or in kind, with the aim of developing a political activity or providing support to a political party, a candidate or an elected representative.

Group rules

- Political activities carried out by employees must be conducted exclusively in a **private sphere**. They must **be declared** to the Human Resources Department and to the Compliance Department, in accordance with the rules on the prevention of conflicts of interest.
- Any financial or in-kind contribution made by the Group or by one of its employees on its behalf to organizations, parties or political figures is **prohibited**, in accordance with the applicable regulations⁹.

⁹ Law No. 95-65 of 19 January 1995 on the financing of political life.

Case study: Dual mandate

An employee of SFR holds the office of mayor alongside with his salaried activity. As part of his mandate, he oversees the call for tenders to choose the town hall's telecommunications contract. Knowing the SFR offers well and being certain that it is the best possible choice of telecommunications operator, he chooses SFR.



This is prohibited.

Any employee holding a mandate must declare it using the conflict-of-interest declaration form. In the present case, the employee favored SFR in the context of his political mandate, thus exposing SFR to an act of corruption via a public official.



In practice

Conflict of Interest Management
Policy

Case study: With all my friendship

During a business event, an SFR director met a candidate in a political election, who also happened to be an old school friend. During the discussion, the candidate told him about the difficulties his municipality had in obtaining subsidies to set up sports clubs for young adults. The director suggested that he check with marketing to see if it would be possible to organize a sponsorship or donation.



This is risky.

Although the proposal is for a charitable cause, no sponsorship or donation should be offered to a third party standing for political election. Such an action could be considered a political contribution, which is prohibited.



In practice

- Policy on lobbying activities
- Policy on the prevention of conflicts of interest
- Policy on gifts and invitations



4.4 – Relations with stakeholders

The Group maintains relationships with various external parties during its activities, such as customers, suppliers, subcontractors, intermediaries and representatives of public authorities. Although these business relationships are essential to the Group's activity, they may present risks of corruption, fraud or anti-competitive practices if they are not properly managed. The Group therefore applies transparency and compliance rules to ensure ethical relationships with all its stakeholders.

Business partners

Definition

Business partners refer to all the external players with whom the Group interacts (customers, suppliers, subcontractors, etc.) during its business activities.

These relationships, which are omnipresent in the Group's operations, can sometimes lead to situations that are against the law, such as acts of corruption or other illegal practices (fraud, anti-competitive practices, money laundering, etc.).

Groupe rules

- Employees must respect the Group's policy on **gifts and invitations**.
- Employees must respect the Group's rules on **conflicts of interest**.



Case study: Express supplier

SFR wants to change its equipment supplier because it is not meeting its delivery deadlines.

To do this, the General Management decides to impose a specific supplier, with whom it already has a relationship, without issuing a call for tenders or involving the Purchasing Department.



This is prohibited.

By imposing a service provider, the General Management exposes the Group and its employees to the risk of corruption, fraud, embezzlement and anti-competitive practices.



In practice

- Policy and Procedure on the prevention of conflicts of interest
- Third-party evaluation procedure
- Purchasing policy

Commercial agents and intermediaries

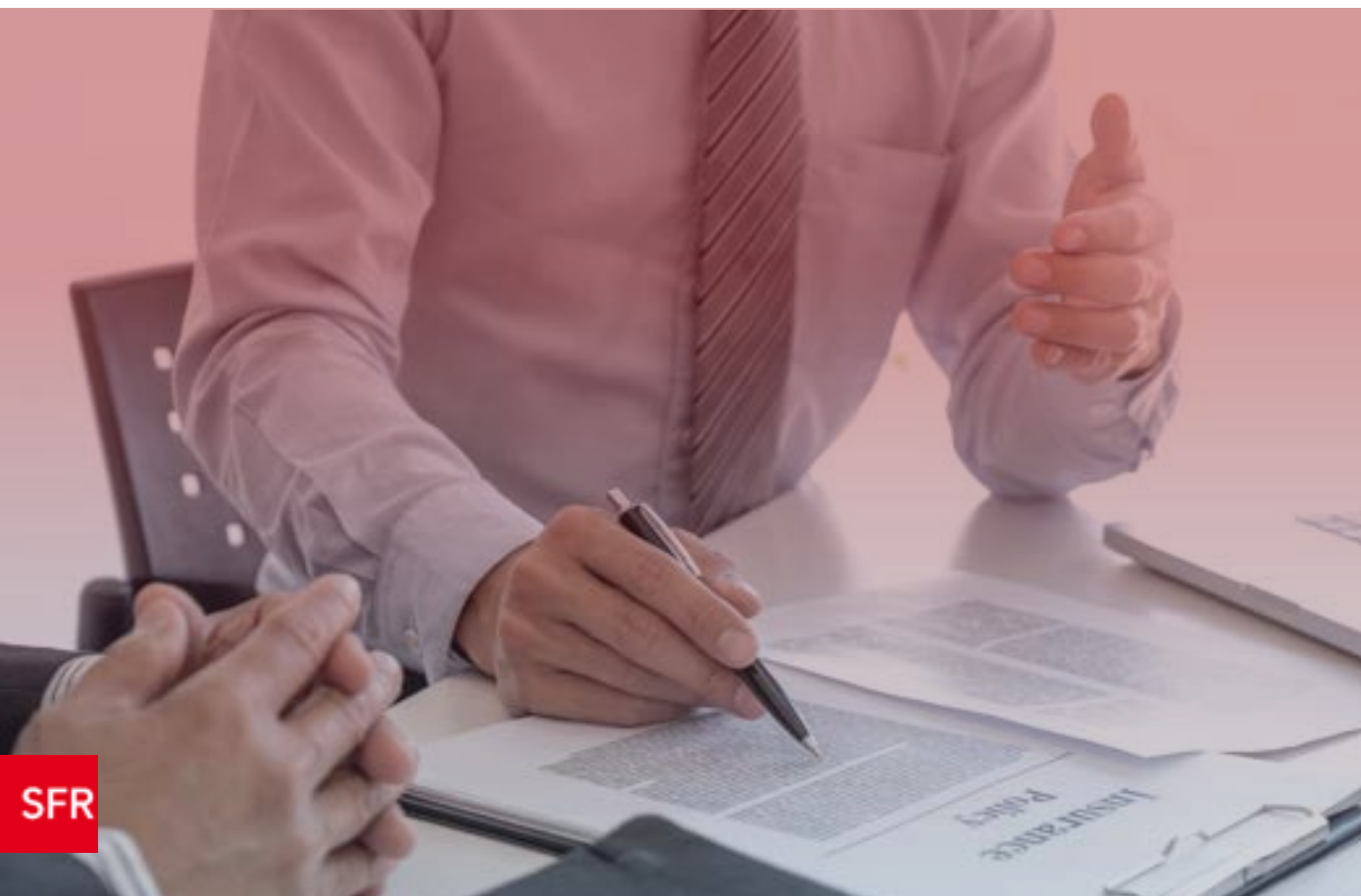
Definition

Commercial agents and intermediaries (brokers, distributors and other representatives) act on behalf of the Group as intermediaries between the Group and its customers and/or suppliers and are often remunerated by commission.

These agents may be exposed to high risks of corruption, justified by their proximity to third parties, by allowing themselves to be tempted to offer or receive gifts and/or invitations with the aim of obtaining potential contracts.

Group rules

- Employees must comply with the Group's **gift and invitation** Policy.
- Employees must comply with the rules relating to the Policy on the prevention of **conflicts of interest**.
- Employees must comply with the **third-party evaluation** procedure.



Case study: A limitless business offer

A commercial agent acting as an intermediary for SFR is seeking to increase his commissions. He starts offering free SFR services or reduced prices not declared in order to obtain contracts with potential customers and encourage them to choose SFR as their provider.



This is prohibited.

These practices are a form of private corruption and, if discovered, may compromise the integrity of the Group and its employees, ultimately leading to the loss of numerous contracts.



In practice

- Policy and procedure on the prevention of conflicts of interest
- Gifts and invitations Policy
- Third-party assessment procedure



Public officials and politically exposed persons

Definition

Public officials are persons vested with **public authority** or charged with a **public service mission**. Politically exposed persons (PEPs) are persons who hold or have held **important public functions**, whether at the national or international level (ministers, members of parliament, etc.), as well as members of their immediate entourage.

Because of their **authority and prominence**, these individuals are particularly exposed to high risks of corruption and influence pending.

Group rules

- Employees must comply with the Group's **Gift** and **Invitation** Policy.
- Employees must comply with the Group's rules on **conflicts of interest**.
- Employees must comply with the rules on the **lobbying**.

Case study: Free trip, free win?

SFR wants to obtain a contract to provide internet services to a large city, whose mayor is overseeing the process.

In order to ensure that they win the contract, an SFR salesperson offers to give the mayor, and a person of his choice, an all-expenses-paid trip abroad with accommodation to attend a conference organized by an SFR team in order to establish a good relationship.



This is prohibited.

Employees are prohibited from granting undue advantages to a third party to obtain something in return. In addition, it is also prohibited to offer transport and accommodation to a third party knowing that the event is not organized by SFR, and that the invitation is sent to the mayor and to the person of his choice.

If this is revealed, SFR could be accused of suspected corruption and anti-competitive practices.



In practice

- Policy and procedure on the prevention of conflicts of interest
- Gifts and invitations Policy
- Third-party assessment procedure

4.5 – Procedures and transactions

As part of its activities, the Group is required to engage in various financial transactions. These transactions require strict supervision to ensure compliance with anticorruption and transparency.



Merger, acquisitions and equity investments

Definition

A merger is the operation by which a company transfers its assets to an existing company or to a new company that they form.

An acquisition is the operation by which a company acquires all or part of the capital of another company which, at the end of this operation, remains a separate legal entity.

An equity investment is the action by which a company buys or subscribes to securities issued by a company to become a shareholder.

Group rules

- Any merger, acquisition or equity investment must first be subject to a **risk analysis** that includes the risk of corruption and influence peddling.
- Once the operation has been carried out, a **provisional schedule for integration** specific to the prevention of acts of corruption is put in place.



In practice

Compliance procedure in the context of mergers and acquisitions



Accounting records

Definition

The accounting records must reflect all the company's financial transactions in a faithful and transparent manner. Rigorous management of the accounts is essential to prevent and detect corruption.

Group rules

- All transactions must be recorded accurately and in accordance with applicable accounting standards.
- It is strictly forbidden to mask or falsify transactions in order to conceal illicit payments.
- Regular internal audits must be carried out to guarantee the transparency and accuracy of the accounts.



In practice

Anticorruption accounting control plan

Recruitment of shame jobs or internships

Definition

Shame jobs refers to the recruitment of employees or trainees based on personal connections or external influence, rather than on objective and transparent criteria, with the aim of obtaining an advantage for the Group or for third parties.

Group rules

- No job or internship should be offered in exchange for favors or to influence a business decision.
- The recruitment process should follow a formalized and transparent procedure, guaranteeing equal opportunities.
- Any conflict of interest in the recruitment process should be reported.



Case study: A helping hand

An employee receives a request from a third party with whom he has regular professional dealings. The third party asks the employee to intervene on his child's behalf to obtain a work-study placement.

Not wanting to directly involve SFR (to avoid a conflict of interest) and wanting to do a favor for the third party (which may help with future negotiations), the employee decides to contact one of his friends working in a former company of the Group. He strongly insists on this work-study program and promises to return the favor in due course.

Look, you'd be doing me a big favor. He's looking for an apprenticeship. I'll make it up to you, I promise.



This is prohibited.

Strongly supporting an application (regardless of the position applied for) from a third party with whom SFR works could be considered as corruption. In this situation, the employee should have sent the candidate's CV without insisting or offering any service in return.

The fact of not supporting this recruitment within SFR does not minimize the risk of corruption. This approach can be interpreted as an attempt to influence which would compromise the integrity of the Group.

Recruitment must be done transparently based on skills and without anyone intervening to obtain favors.



In practice

Recruitment Policy

A magnifying glass with a black frame and handle is positioned over a silver laptop keyboard. The keyboard features white keys with black lettering. A large, bold, white number '5' is superimposed over the center of the image, partially covering the magnifying glass and the keyboard. The background is a soft, out-of-focus view of the laptop screen and the rest of the keyboard.

5

Prevention tools

Prevention and raising awareness among employees

The Human Resources Department, including the Training Department, takes the fight against corruption very seriously. All new employees are made aware of this as soon as they take up their post by being given this Code together with the Internal Rules.

The Group implements and maintains a program to raise awareness and train its employees, which is described as follows:

- An online **training module** for all employees. It defines the concepts of corruption and influence peddling and sets out the various rules applicable to everyone through practical cases reflecting the risks of the Group's corruption risk mapping.
- A specific training **module for employees most exposed to the risks of corruption and influence** peddling. The content of this training is based on the risks identified by the mapping and incorporates the risks inherent in the Group's various business lines so that they can minimize these risks in their day-to-day work.

The whistleblowing alert system

The whistleblowing alert system allows any employee or stakeholder to report, in complete **confidentiality** and in a **secure manner**, any behavior or situation that contravenes the Group's ethical rules and principles, particularly with regard to corruption or fraud, via the platform: **alertealticefrance.sfr.com**

Any violation of this Anticorruption Code of Conduct may be reported by the employee in the event of a violation of one of its provisions.

In accordance with the French **Sapin II law** and the French **Waserman law**¹⁰, whistleblowers enjoy enhanced protection against any form of reprisal or sanction, provided that the report is made in **good faith** and **disinterestedly**.

- The whistleblowing alert system is accessible to all employees and allows them to report any offence or suspicious behavior, **anonymously** or otherwise.
- The whistleblower must act in good faith, without receiving any compensation and with sufficient evidence to support his alert.
- The Group guarantees the **confidentiality of alerts** and the **protection of whistleblowers** against any form of retaliation.



In practice

- Practical guide to the Altice France internal whistleblowing procedure
- Personal data protection Policy of the whistleblowing platform

Contacts – Compliance Department

The achievement of the Group's anticorruption objectives depends on the determined commitment of each one of us.

Daily discussion, exchange and mutual assistance are essential to enable you to act in the best interests of the organization.

The intranet page of the Anticorruption Compliance Department centralizes all documentation, guides and internal policies intended to clarify or supplement the rules and principles described in this Code of Conduct. These resources are supplemented and updated regularly.

All employees are invited to contact the Compliance Department with any questions or concerns at the following address:
DirectionConformité@sfr.com

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Ethique &
Conformité
Anticorruption