

# ANTI-CORRUPTION DECLARATION

## FIGHT AGAINST CORRUPTION

ALTEO CSOPORT



### WHAT IS CORRUPTION?

**Corruption is the abuse of power to gain financial and non-financial benefits.** It diverts resources from their intended use, distorts competition and creates huge inequalities in both the private and public sector. Corruption can also take the form of bribery, solicitation of bribes and extortion (International Chamber of Commerce 2013).

Corruption presents a serious problem and threat to the stability and security of societies, undermining the institutions of democracy and democratic values, moral values and justice.

**Corruption is a threat to sustainable development** and the rule of law, and it is also a potential source of interconnection with other forms of crime, in particular organized and economic crime, including money laundering.

### OUR ANTI-CORRUPTION DECLARATION

By issuing this Declaration, the ALTEO Group seeks to use its internal rules of procedure to **facilitate the more effective and efficient prevention and elimination of corruption.**

The ALTEO Group **rejects all forms of corruption** (including bribery, facilitation payments, kickbacks, extortion, abuse of power for personal gain, or the provision of undue advantages or gifts with the intention to influence). If any of these come to the attention of the ALTEO Group, zero tolerance will be applied.

### WHAT DO WE DO?

- Refusal of benefits, restriction on the acceptance of gifts

Acting on behalf of the Group, **we do not solicit any benefits from our business partners.** We will ensure that **gifts** and entertainment are only accepted in a reasonable and **proportionate** manner, **as part of normal business relationships.** They should take place on a case-by-case basis only at all times and may not influence or appear to be influencing our decisions.

- Conflict of interest checks, reporting obligation

In the event of a conflict of interest, personal or business interests may interfere with objective decision-making and there is a risk that decisions may be taken which are or appear to be biased. **Any conflict of interest is contrary to the values of ALTEO**, and, as a responsible company, we are committed to preventing and eliminating such situations.



- Application of a pre-qualification procedure  
Our procurement procedures are conducted in a transparent manner and in accordance with our internal rules. We assess potential **suppliers based on a pre-qualification procedure** (considering sustainability, financial and legal aspects).
- Establishment and operation of a reporting line  
We **operate a whistleblowing hotline** for the reporting of corruption and fraud.
- Organization of trainings, issue of information notices.

We regularly educate our employees **in the form of ethical training courses and by issuing information notices.**