

CODE OF BUSINESS  
INTEGRITY  
FOR PARTNERS

**Key words:**

CORRUPTION  
INFLUENCE PEDDLING  
GIFTS, HOSPITALITY  
DONATIONS, PATRONAGE  
CONFLICTS OF INTEREST  
WHISTLEBLOWER  
CRIMINAL SANCTIONS  
DISCIPLINARY SANCTIONS

**SUMMARY**

- I. A WORD FROM THE CEO..... 3**
- II. VALUES AND CONVICTIONS..... 4**
- III. OUR RULES OF CONDUCT.....5**
- IV. IMPLEMENTATION OF THE CODE.....9**

# I A word from the CEO



As a responsible economic operator, **integrity and probity** are at the heart of everything we do.

They are an absolute priority that form part of our **stated intention to collectively respect** all stakeholders, such as our customers, employees, partners, and the public authorities. It is consequently of the utmost importance for us to make every effort to **ensure that our business operations are lawfully carried out, in an ethical and responsible manner.**

This conviction that ethical values and integrity **should guide all Group employees' actions and decisions requires us to demonstrate exemplary conduct, honesty and loyalty**, in full transparency, and in compliance with laws and regulations.

It is therefore essential that we share the same principles with the persons with whom we collaborate. The credibility of our image, the quality of everyone's work, the sustainability of our business operations and our customers' trust depend on the implementation of these values and contribute to **our mutual development.**

The rules set out in this Code of Business Integrity consequently represent an **indispensable aspect of our business relationship**, which you accept to comply with by working with us, **to cooperate on a long-term basis in the development of ambitious and responsible projects.**

Dominique Thillaud  
Chief Executive Officer

## 2 Values and convictions

CDA's model is founded on the **values of probity, compliance and integrity**. This is why the Group is very **vigilant in its choice of partners**.

The **objective** of the Code of Business Integrity for Partners is consequently to **make sure that the Group's values align with its partners' values** and, by extension, **ensure that partners comply with the rules set out in this Code**.

This Code **applies to CDA's subcontractors, clients, providers and suppliers, and its sales agents, consultants and representatives** on assignments in **France and worldwide**.

By collaborating with us, you also commit to require that your co-contractors, subcontractors and suppliers working for you or with you on the same project **comply with the rules set out in the Code**.

When a CDA partner already has its own code of conduct, a comparison of the provisions contained in the codes is carried out to **check that they are consistent**.

# 3 Our rules of conduct

CDA commits to comply with national laws and regulations. CDA requires its partners to **obtain precise information on the laws and regulations** that apply to their business operations and comply with the laws and regulations in force in the countries where they are established, in the countries where they operate, in addition to international laws and regulations, including those relating to international sanctions.

**Any action by a partner must consequently be carried out with professionalism, impartiality, transparency and probity, and must be fairly and accurately documented.**

## 1) ACTS OF CORRUPTION

CDA has established the fight against corruption as one of the core focuses of its compliance policy.

CDA partners must not propose, request or accept, directly or through an intermediary, any donation, offer or promise, gift or benefit in return for performing, delaying or failing to perform an act which, directly or indirectly, falls within their duties in order to obtain or maintain an unjustified commercial or financial advantage, influence a decision, or give the impression of influencing a decision.

CDA has a **zero tolerance** policy to any conduct that may be qualified as corruption and has implemented a corruption prevention plan.

CDA insists on the need for partners to refrain from engaging in conduct that may be assimilated to corruption, regardless of the intended goal.

## 2) CONFLICTS OF INTEREST

A conflict of interest may arise when interference exists in a professional situation between the position performed in the company and a personal interest in such a way that this interference influences or alters the loyal, impartial, independent and honest performance of the position on behalf of the company.

Therefore, there is a potential conflict of interest when a person's interests conflict in one way or another with the interests of the Group and/or its employees, partners, etc. A conflict of interest is an established fact, a situation; it does not constitute a criminal offence or wrongful act.

**Various measures to prevent and detect high-risk situations have been implemented by the Group** to avoid potential conflicts of interest (reporting, awareness-raising, etc.).

Partners therefore have a duty to **act honestly and transparently** and must promptly inform the Contact Person at CDA if they identify an actual or apparent conflict of interest so that a reasoned and documented decision can be taken.

### **3) UNRESTRICTED COMPETITION**

Competition **law** seeks to fight anti-competitive practices such as unfair competition, unlawful cartels and abuse of a dominant position by implementing rules to guarantee that competition is unrestricted as well as healthy and fair.

The Group consequently places particular importance on its partners' compliance with the rules of unrestricted competition (prohibition on unlawful cartels, etc.).

### **4) GIFTS AND HOSPITALITY**

A gift is an item offered for no payment, an offer of accommodation or a meal, an invitation or any other benefit enjoyed by the beneficiary for free and which has a value. Gifts and hospitality are an ordinary part of doing business and do not in themselves constitute acts of corruption. A gift must be given out of courtesy in accordance with the customs in the country where it is given.

**CDA has defined principles and set out expected conduct by Group employees in a specific policy.** Accepting or offering gifts or hospitality should prompt each employee to ask whether they are acting appropriately to prevent their integrity and the company's integrity being called into question.

CDA consequently requires its partners to apply equivalent precautions mainly by refusing any gift, invitation or benefit that may compromise their independence of judgement.

Gifts must consequently **remain reasonable, modest and proportionate to the situation.** Partners must demonstrate **transparency** in this respect.

## **5) SPONSORSHIP, PATRONAGE AND POLITICAL CONTRIBUTIONS**

Through sponsorship or patronage, CDA provides financial or material support to charitable organisations or social, cultural or sports actions to back initiatives with no specific advantage other than promoting the image of the Group and its values.

CDA consequently **prohibits** its partners from offering donations, political contributions or carrying out sponsorship in its name.

When they do so in their own name, partners of the Group must ensure that this action **cannot influence or give the impression of influencing decision-makers or customers in relations with CDA.**

## **6) CORPORATE SOCIAL RESPONSIBILITY**

### **Human rights and rights at work**

CDA requires that partners **comply with human rights and rights at work** in accordance with ILO fundamental Conventions: prohibition of forced labour and child labour, no discrimination at work, equal pay for equal work, organisation completely focused on hearing employees' concerns.

### **Health and safety**

With around 5,000 employees, the Group seeks to encourage innovative initiatives in the social sphere and constantly reinforce social dialogue.

CDA consequently hopes that its partners strictly respect **very high level safety rules** (appropriate equipment, in good working order, essential safety instructions, etc.) and also **workplace health and safety rules.**

### **Environment**

Respect and protection of the environment are core values that CDA wishes to affirm and promote. In this respect, the Group constantly pursues its efforts, in relation to **energy, water management, biodiversity and visual pollution** which are its major challenges in terms of its environmental footprint. The Group also wants its partners to contribute to reducing the negative impact that may be caused by our business operations on the environment by taking appropriate measures.

# 4 Implementation of the Code

## PARTNER COMMITMENTS AND IMPLEMENTATION OF THE CODE

Compliance with this Code is required by all CDA partners and their own partners and subcontractors.

By working with CDA, our **partners commit to:**

- Comply with this Code of Business Integrity throughout the assignment,
- Accurately and fully complete CDA's Questionnaire and provide all documents required to conduct preliminary due diligence.

In the event of any breach of this Code, CDA Group may be required to **take sanctions ranging from terminating the business relationship to bringing civil or criminal proceedings**, if justified by the circumstances, in accordance with an **escalating procedure**:

- First, CDA may raise **reasoned and documented** comments, questions and observations.
- The partner **may respond and provide any document that it considers relevant**, to promptly find a corrective solution to the non-compliance.
- In the event where CDA continues to have serious doubts at the end of this exchange, or if the solution proposed by the partner does not seem appropriate to it, **an audit of the partner may be conducted by the Group on the relevant matter**.
- If the partner refuses to undergo the audit or the audit results in an adverse opinion, or in the event of serious misconduct, **CDA may terminate the contract with the partner, and even launch legal proceedings**.

## WHISTLEBLOWING POLICY

Any employee or any person engaging in relations with CDA can **submit a whistleblowing alert in the event of breach of the provisions of this Code**.

To this end, CDA has implemented a whistleblowing alert mechanism and provides a dedicated email address, platform and telephone line:

- [conformite@compagniedesalpes.fr](mailto:conformite@compagniedesalpes.fr)
- <https://report.whistleb.com/compagniedesalpes>
- FRANCE 0800 916 095 Code 7356

All whistleblowing alerts will be handled in **complete confidentiality** ensuring that these persons are provided all legally required protection.