



SUSTAINABLE
DIGITAL WORKPLACE
PERFORMANCE
an **epsa** company

ANTI-CORRUPTION POLICY



SAASWEDO IS DRIVEN BY THE CONVICTION THAT THE COMPANY OF TOMORROW WILL BE RESPONSIBLE.

SAASWEDO is a signatory of the United Nations Global Compact and therefore supports the seven core issues, including fair practices (fight against corruption).

The objective of this Anti-Corruption Policy is to establish rules of good conduct so that each of SAASWEDO's players knows how to behave in risky situations (offering or accepting gifts and invitations, situations of conflict of interest, relations with third parties, setting up partnerships, etc.).

It is by raising the awareness of each of its managers and employees that SAASWEDO will be able to effectively fight against the various forms of corruption, both with regard to public officials and private individuals.

This policy, which specifies the sanctions applicable in the event of non-compliance with its provisions, has therefore been added to the internal regulations of each of SAASWEDO's entities and training campaigns and workshops have been organized.

Christian COR
Founding president of SAASWEDO





BEHAVIORS **PROSCRIBED**

The law expressly prohibits certain objectionable conduct that constitutes a criminal offense. These include (and are described below) :

- Corruption ;
- Influence peddling;
- Illegal solicitation;
- Facilitation payments;
- Falsification of accounting records.

SAASWEDO's managers and employees who commit these serious offences are not only liable to criminal prosecution but also to sanctions

CORRUPTION

Corruption is defined as:

"The act of offering without right, offering or promising to offer (active bribery), soliciting or accepting (passive bribery) directly or indirectly, offers, promises, gifts or advantages of any kind to perform or refrain from performing an act of one's function, mission or mandate."

The notion of advantage is broad: cash or equivalent, meals, entertainment, travel, gifts, hiring, contracts, benefits in kind, or any other type of similar goods or services with tangible economic value. Thus, "bribes" or "kickbacks" are prohibited.

SAASWEDO's managers and employees must respect the following rules:

- With regard to SAASWEDO's public service contacts (prospects, suppliers, customers, etc.), no advantage of any kind may be offered or accepted, regardless of the context;
- With regard to SAASWEDO's private contacts :
- For clients and suppliers with whom a contractual relationship has been formalized, managers and employees are invited to refer to the paragraph "gifts, invitations, business meals" below;
- For prospects (as for public service actors), no advantage of any kind whatsoever may be offered or accepted, regardless of the context.

INFLUENCE PEDDLING

Influence peddling is characterized:

"When a person offers or solicits (active influence peddling), or accepts (passive influence peddling), without right, at any time, directly or indirectly, offers, promises, gifts, presents or advantages of any kind, to abuse or have abused his real or supposed influence in order to obtain from a public authority or administration, distinctions, jobs, contracts or any other favorable decision."

This offence is not applicable in the context of SAASWEDO's relations with its private interlocutors.

On the other hand, within the framework of their relations with public authorities and administrations (e.g. call for tenders on a public market, execution of a public contract), SAASWEDO's managers and collaborators must adopt an exemplary behaviour by :

- Not playing any relationship, and not taking any action that could influence the decision making of the public actor (active influence peddling);
- Not granting any request for an advantage from a member of the administration or public authorities, even if it would allow, for example, to obtain a public contract or any other advantage (passive influence peddling).

ILLEGAL SOLICITATION OR « BRIBERY »

Concussion is defined as :

"The fact, by a person in charge of the public authority or in charge of a public service mission, to receive, demand or order to collect as duties or contributions, taxes or public taxes, a sum that he knows is not due, or exceeds what is due."

This infringement only concerns the tax administration or any other public service actor in charge of collecting taxes or similar payments. It is therefore not applicable between SAASWEDO and its private interlocutors.

SAASWEDO's managers and employees who interact with these interlocutors are required to ensure the validity and completeness of the taxes and contributions to be paid, to avoid any risk of misappropriation.

FALICITATION PAYMENTS

Facilitation payments are :

"Informal payments made to facilitate or expedite the completion of a legitimate administrative process or certain administrative formalities such as administrative clearances or customs clearances."

This offence only concerns public service agents. It is therefore not applicable between SAASWEDO and its private interlocutors.

- SAASWEDO's managers and employees who, in the context of their mission, are awaiting an administrative decision (e.g. authorization, court decision, validation of a file or savings, etc.) must refrain from doing so
- To offer their interlocutors any kind of advantage in order to obtain facilitated or expedited treatment;
- To accept a solicitation from a public service agent to that effect.

FRAUDULENT ACCOUNTING ENTRIES

The accounting principles of regularity, fairness and true and fair view must be scrupulously respected. No deception or falsification of accounting entries concealing an act of corruption or influence peddling is tolerated, whatever the country or activity concerned.

The directors and employees in charge of SAASWEDO's financial management (financial directors, financial managers, management controllers, etc.) must therefore comply with the applicable rules in terms of accounting treatment and check the work provided by SAASWEDO's chartered accountants and, where applicable, its auditors, in order to identify any fraudulent anomalies in the accounting entries.

Also, in the continuity of these fraudulent entries, comes a total fight against money laundering or capital and the financing of terrorism.



ZERO TOLERANCE

SAASWEDO affirms the principle of zero tolerance and expects a high degree of integrity and vigilance on the part of all managers and employees in the fight against the Prohibited Behaviors described above, in any country where SAASWEDO operates.

In this logic, it is not allowed or accepted any actions with the aim of restricting or favoring unfair competition, in an abusive and dominant way. It is therefore forbidden to engage in cartels, abuse of dominance and abusively low price offers and practices.

It is therefore expected of everyone:

- Participation in training sessions ;
- Recording of incidents ;
- Reporting conflicts of interest;
- Increased vigilance regarding benefits (gifts, invitations, meals, etc.).

As SAASWEDO is part of the EPSA Group (www.epsa.com) the specific case of patronage and sponsorship contracts is also discussed, in particular due to the creation of the "EPSA Foundation" endowment fund. (<https://www.epsa.com/epsa-foundation/>)

PARTICIPATION IN TRAINING SESSIONS

Every year, SAASWEDO organizes several internal training sessions on the subject of compliance, systematically including an anti-corruption component. SAASWEDO's managers and employees undertake to attend these sessions at least once a year in order to be made aware of and trained in the prevention and management of risky situations.

RECORDING OF INCIDENTS

OFFICER OR EMPLOYEE SOLICITED BY A THIRD PARTY :

In the event that a SAASWEDO manager or employee is confronted with an illegal solicitation from any third party (public or private), the AFA (French Anti-Corruption Agency) and Transparency International recommend the following behaviour
Anti-Corruption Agency) and Transparency International recommend the following behaviour :

Refuse the proposal courteously (reminding the employee of the SAASWEDO rules and the risks to which he or she is exposed in case of breach) ;

- Recording the incident (day, date, time, place, contact person, subject of the request and any other useful information);
- Informing SAASWEDO's dedicated contacts by sending an e-mail to

- compliance@saaswedo.com (so that SAASWEDO can determine whether other employees have been placed in a similar situation) ; the email should have the subject "Anti-Corruption".

Such internal reporting will allow SAASWEDO to ensure compliance with the code of conduct by issuing an internal communication to remind the applicable rules and the dangers resulting from such solicitations.

OFFICER OR EMPLOYEE WITNESSING A VIOLATION

Any officer or employee who witnesses Prohibited Conduct may report it to compliance@saaswedo.com ; the email should have the subject line Subject line : "Whistleblower".

Such a report will allow SAASWEDO to investigate and correct, in the event of a proven violation of this Anti-Bribery Policy, or of any relevant law or regulation, the illegal situations.

The person making the report will be placed under the protective regime of the "whistleblower" if and only if the following conditions are met :

- The whistleblower is a natural person who discloses or reports, in a disinterested manner and in good faith, a crime or misdemeanor, a serious and manifest violation of an international commitment duly ratified or approved by France, of a unilateral act of an international organization taken on the basis of such a commitment, of the law or of the regulations, or of a threat or a serious prejudice to the general interest, of which he or she has had personal knowledge".

The whistleblower will not be prosecuted if he or she acts in a disinterested and good faith manner in the public interest when the disclosure is necessary and proportionate to safeguard the interests at stake.

If the report is found to be unfounded but made in good faith, the whistleblower will not be prosecuted. However, in the event of bad faith reporting or malicious accusations, disciplinary or legal action may be taken.

REPORTING CONFLICTS OF INTEREST

A conflict of interest occurs when a person is, or appears to be, in a position to influence, through the exercise of his or her duties, a decision from which he or she could obtain a personal advantage, or which could benefit persons with whom he or she has some connection.

In the event that the personal interests of a manager or an employee of SAASWEDO interfere with the professional interests of SAASWEDO, it is the responsibility of

- The manager concerned must bring together the persons authorized to deal with the said conflict, in order to find a solution to the conflict situation ;

- The employee concerned to inform his or her hierarchy and to report it to the address
- compliance@saaswedo.com, so that the authorized contacts can find a solution to the conflict situation ; the e-mail must have the subject line "Conflict of interest".

- "Conflicts of interest"

GIFTS, INVITATIONS AND MEALS

As stated in the Prohibited Corrupt Behavior, no gifts, invitations or business meals may be offered in connection with:

- Relationships of any kind between SAASWEDO and any entity belonging to the public service (prospect, client, supplier, etc.) ;
- Relations between SAASWEDO and its private prospects (for which only the negotiation of the rates proposed by SAASWEDO can be offered as a commercial gesture, to encourage contracting).

On the other hand, these "benefits in kind" are authorized with existing SAASWEDO customers, strictly for the purpose of building customer loyalty (which therefore excludes any personal interest).

With respect to gifts and entertainment (both those offered to and received from customers or any other third party), the following rules must be observed:

- The benefit in kind offered or received must be recorded (day, date, time, place, participant(s), purpose, amount and any other relevant information) ;
- Events and gifts that are contrary to the law and regulations or that, by their nature, are contrary to the values of SAASWEDO and therefore likely to harm its image are prohibited;
- The gift cannot be monetary (cash, transfer, currency etc.);
- The event or good offered must be of low value ; thus, for any benefit in kind exceeding €70 exclusive of tax, a request for authorization must be sent to the address compliance@saaswedo.com; the e-mail must have "Gifts and invitations" as its subject.

For business meals:

- For employees, prior authorization from the supervisor (who is in charge of validating expense reports in the HRIS system);
- The meal must be directly related to the professional activity;
- The value of the meal must be reasonable in relation to the country's practice and adapted to the beneficiary's duties and circumstances;
- The expense report must mention the date, the number of meals or guests, the stamp of the establishment and the VAT.
- In any case, the granting of these benefits must remain punctual and reasonable and may not take place if there is a risk of conflict of interest.

PARTNERSHIPS, DONATIONS

SAASWEDO is part of EPSA Group (www.epsa.com) EPSA has chosen to set up an endowment fund called "EPSA Foundation". (<https://www.epsa.com/epsa-foundation/>) Within this framework, but also in the daily life of the business, EPSA can be led to sign contracts of partnership, patronage, or to make donations, which enables it to work in favor of the civil society by supporting associations and national or international organizations.

Anti-corruption laws do not prohibit donations and sponsorships.

However, care must be taken to ensure that the funds provided are used for their intended purpose and not diverted, that they are provided to the appropriate recipients and that they are used for legitimate purposes.

To mitigate this risk, the sponsorship contract must be submitted to SAASWEDO's Legal Manager and CSR Manager (recipients of emails sent to compliance@saaswedo.com) for verification to ensure that:

- The donation will be used by its recipient for a purpose consistent with SAASWEDO's ethics and values (e.g., exclusion of political activities);
- The ethics, seriousness and CSR policy of the beneficiary correspond to the expectations and values of SAASWEDO ;
- Under no circumstances will the donation be paid in cash, nor by bank transfer to an individual's personal account;
- The amount of the donation must be approved in writing by the Supervisory Board of EPSA Foundation (even if the sponsorship contract is signed directly by a SAASWEDO entity);

The documents related to the donation must be kept.

It is specified that the above conditions must also be respected when SAASWEDO supports, through a sponsorship contract or any other contract, sporting, social, cultural or educational events.



SANCTIONS

SAASWEDO's managers and employees are informed that any violation of this Anti-Bribery Policy will expose them to disciplinary and criminal sanctions in accordance with the regulations in force, particularly with regard to articles 433-1 et seq. of the French Criminal Code.

Disciplinary sanctions will be proportionate to the litigious actions, and will range from a simple warning to dismissal for misconduct.

In the event of criminal prosecution, SAASWEDO will file a civil suit. Indeed, such actions would be contrary to its commitments and would lead, de facto, to a damage to its reputation.



ABOUT OUR COMPANY

SAASWEDO is one of the leaders in digital workplace performance management for companies. SAASWEDO supports more than 1,000 clients, with strong expertise in three areas

- Financial performance of the Digital Workplace
- Operational performance of asset management
- Environmental performance in terms of controlling the carbon footprint of the digital environment

SAASWEDO's strength lies notably in the quality of its experts and the power of its technological solutions.

**Our promise : to identify and exploit the performance potential of the
of the Digital Workplace to improve your company's profitability.**

Today, SAASWEDO is taking on a new challenge by including CSR solutions in each of its areas of expertise in order to provide an offer that is adapted to today's challenges and to anticipate those of tomorrow.

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