



DONATIONS & SPONSORSHIPS

CODE OF CONDUCT

**ADEO PARTNERS
V. 01/09/2023**



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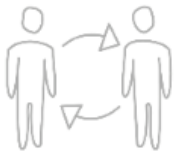
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1. THE KEY ELEMENTS OF ADEO CULTURE

ADEO is a platform of companies that are open and connected with partners. Every day, we make products and solutions available, either in store or online, that are useful for inhabitants and housing professional projects. Living in a healthy, secure, responsible, sustainable and comfortable environment is crucial for the well-being of inhabitants everywhere around the world. We are all motivated by a shared purpose: to be useful. Useful to ourselves, to others and to the world.

We make home a positive place to live

Our purpose is to engage all citizens in making our homes a positive place to live, our common home being the planet. We engage all our stakeholders in our approach.

Each of the companies making up the ADEO community has **strong values that are shared by all employees and lived out on a daily basis**. Our values define our behaviour within our companies but also within our ecosystem of customers, partners, suppliers, service providers, administrations, etc.

This Donations and Sponsorships Code of Conduct demonstrates the determination of ADEO and all its member companies (hereinafter "ADEO") to apply the ADEO principles and values to all of its Partners (as defined below).



2. TO WHOM DOES THIS DONATIONS AND SPONSORSHIPS CODE OF CONDUCT APPLY?

This ADEO Donations and Sponsorships Code of Conduct applies to **all ADEO Partners (hereinafter, the “Partner”) of a donation or sponsorship operations set up by ADEO and its subsidiaries.**

Donation refers to any financial (monetary contribution, membership fee, etc.) or material (donation or loan of goods) operations, conducted without any direct or indirect counterpart, by one or more ADEO companies, with a charity or legal entity exercising activities of general interest.

Sponsorship refers to any material support provided by one or more ADEO companies to an event, natural person or organisation in the aim to obtain a direct benefit for ADEO. This benefit consists mainly of the promotion of the ADEO brand image.

When the Donations and Sponsorships Code of Conduct is more demanding than local laws or practices, as a Partner, I commit to respect the present Code of Conduct which must take precedence for entities in relation with Adeo. Provided that the provision of this Code of Conduct is not contrary to local law or regulation.

As a Partner, I therefore undertake to sign the Donations and Sponsorships Code of Conduct and to collaborate with ADEO companies to implement it and, if necessary, to take any appropriate corrective measures as part of a continuous improvement process. Compliance with the principles of this Code of Conduct is essential and decisive for the continuity of relations between ADEO companies and its Partners.

ADEO may modify the Donations and Sponsorships Code of Conduct at any time in order to be able to respond appropriately to legislative changes or new situations. On this occasion, the new version of the Code will be submitted to you for approval.



3. ADEO COMMITMENTS

ADEO Partners, particularly associations, with which ADEO has relationships are essential for the achievement of ADEO's social objectives. It is therefore important to recall ADEO's commitments to them.

_SELECTION OF PARTNERS

In order to implement the values of mutual aid promoted by ADEO, Partners are according to the social objective criteria defined by the ADEO entity involved and are chosen by ADEO employees responsible for these interactions.

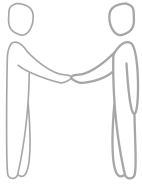
The Partners are selected in compliance with an objective, transparent and honest process, values that are dear to ADEO and that each employee must live every day.

_ETHICAL BEHAVIOUR OF THE ADEO COMMUNITY

ADEO has formalised the behaviours expected from its employees in the ADEO Code of Ethical Conduct which is addressed to them and which constitutes their frame of reference to be respected. The 10 commitments concern:

- Safety first
- Diversity
- Sexist behaviour and harassment
- Personal data protection
- Conflicts of interest
- Invitations and gifts
- Corruption and facilitation payments
- Relations with suppliers, service providers and intermediaries
- Grants, patronage, sponsoring, lobbying
- Fight against fraud

As a result, all our decisions in our Partners selection are also based on these ethical principles.



4. YOUR COMMITMENTS

_BUSINESS ETHICS ASPECT

ADEO has laid down several principles which apply to all its employees and which each of the Partners, with whom we contract, undertakes to respect. This applies in particular to:

- prohibition of gifts, invitations and hospitalities;
- prohibition of facilities payments;
- prevention and detection of conflict of interests;
- compliance with the tax and reporting obligation.

You, the Partner, undertake to inform ADEO, via the alert channel set up and referred to below, of any situation, potential or proven, contrary to the principles contained in the Code. Subsequently, ADEO will qualify the facts reported in order to determine the consequences and the appropriate follow-up.

1. Gifts, invitations and travel

Gifts, invitations and travel can influence independence of judgement in the context of relationships, as well as independence with our Partners.

The rule is not to offer anything to ADEO employees.

Therefore, as a Partner, I commit to:

- Refrain from soliciting or accepting a donation or a sponsorship from/to an ADEO employee in exchange for the granting of any personal benefit whatsoever (goods, services, invitations, etc.), with the exception of small promotional "goodies";
- Prohibition on using your influence, in exchange for this donation or sponsorship, on a person who is a representative of the public authority, entrusted with a public service mission, or invested with a public elective mandate;
- Prohibition on offering an ADEO employee any benefit as a thank you for a donation or sponsorship (a trip of discovery, events, etc.);

- Do not accept any gifts from ADEO employees unless they are clearly of symbolic value: promotional pens, mugs, etc;
- For any meal, accept that everyone takes their share, or possibly, the ADEO employee could (i) invite me in accordance with their internal policies on the matter or (ii) I could invite them with the agreement of their manager according to the ADEO process;
- Refrain from soliciting, in exchange for a good, service or other, any advantage that could influence my professional decision-making.

2. Conflict of interest

As a Partner, I am particularly careful to prevent or avoid any situation of conflict between my personal and professional interests. In the context of my relationship with ADEO, I act solely within the framework of a professional relationship, without ever trying to gain a personal advantage. My conduct must be honest so as not to damage the reputation of my entity or that of ADEO.

Therefore, as a Partner, I commit to:

- Inform ADEO of any potential or proven conflict of interest situations. ADEO will decide what action to take;
- Refrain from concealing from ADEO a situation of potential or proven conflict of interest;
- Refuse to participate in, to supervise, or influence any professional decision concerning a member of my family, a personal relationship or a person employed by ADEO to whom I am financially committed, when I have to manage an operation (selection of the Partner, definition of the operation, etc.) with a Partner which is represented by one of these persons.

3. Corruption and facilitation payments

Corruption and facilitation payments are prohibited.

It is any undue advantage (sum of money, benefit in kind such as a gift, even a modest one, etc.) paid on a personal basis to a public or private person for the performance, non-performance or acceleration of routine acts (customs clearance, issuing of permits, etc.).

Therefor, as a Partner, I commit to:

- Refrain from offering, promising, granting or authorising the remittance of a facilitation payment or any other undue advantage to :
 - o An ADEO employee in order to obtain any advantage from the latter;
 - o A legal or natural person, private or public, in particular within the framework of the execution of my partnership with ADEO.
- Refuse any direct or indirect requests for a facilitation payment or any undue advantage from an ADEO employee or from a private person or public, in particular within the framework of a donation or sponsorship operation with ADEO.

4. Honorability & transparency

ADEO reserves the right to realise a honorability check of the Partners as well as its members.

It will thus be possible for ADEO to request additional information from the Partner.

Any Partner must ensure that procedures are in place to ensure that accounting transactions are not used to conceal corruption.

Therefore, as a Partner, I commit to:

- Responding as quickly as possible, to requests for information and/or questions addressed to me and to provide all documents and information deemed necessary by ADEO. Also, abide by all actions and commitments that may be negotiated and added to the donation/sponsorship agreement.
- Provide supporting documentation pertaining to the use of the donation/sponsorship funds in compliance with the agreement.
- Check that the donation whatever the nature is justified and proportionate to the nature and importance of the partnership in place.
- Comply with the applicable legal rules on traceability and bookkeeping.



5. REPORTING & MONITORING OF COMMITMENTS

▪ Communication and information

As a Partner, I undertake to communicate for application this ADEO Donations and Sponsorships Code of Conduct to all representatives, employees and members of my organisation in contact with ADEO.

▪ Reporting & Monitoring

You, as a Partner, undertake upon request to:

- provide an annual report on any donation or sponsorship operations from ADEO entities from which I have benefited;
- provide to ADEO entities a statement of any counterparty eventually granted as well as a status of their use.

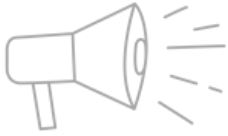
ADEO and its companies will verify compliance with these commitments as part of their duty of care.



6. PENALTIES AND CONSEQUENCES OF NON-COMPLIANCE WITH THE DONATIONS AND SPONSORSHIPS CODE OF CONDUCT

As a Partner, I acknowledge that compliance with the principles set out in this Donations and Sponsorships Code of Conduct is an essential element of the partnership with ADEO.

Failure to comply with any of the provisions of this Code may result, in accordance with the provisions of the contract, in immediate corrective measures or, depending on the seriousness of the failures and/or lack of corrective action plans, in termination of the partnership.



7. HOW TO REPORT A BEHAVIOUR OR SITUATION CONTRARY TO THIS CODE?

In case of any behaviour or situation contrary to the Donations and Sponsorships Code of Conduct and in order to report it to ADEO, a secure alert channel is set up.

This channel is a tool for you to share with us the situations you wish to bring to our attention.

As a Partner, I commit to:

→ Inform through the alert channel, as soon as possible after discovery, any breach of the rules of the Donations and Sponsorships Code of Conduct.

Who can report?

The alert channel is open to any Partner, its members and its employees.

The author of the report must act in good faith, i.e. without malice or without seeking any personal gain. At the time of the report, he/she must have evidence to believe in the truthfulness of the reported statements.

As such, as a Partner, I undertake to:

→ Inform my employees, representatives and members in connection with ADEO of the existence of this alert channel.

How to report ?

<https://adeo.whispli.com/lp/third-parties>



Protection of the alert author

1. Confidentiality & Discretion

The author of the alert has the possibility to remain anonymous or to make his/her identity known at the time of the alert or during the processing. ADEO takes all necessary measures to protect the identity of the author, the persons involved and the persons targeted by the report.

Information, investigations and reports resulting from an alert will also be treated with the utmost confidentiality.

2. Protection of the alert author

The author of an alert issued in good faith is protected with regard to the facts reported. The same protection is afforded to any third party facilitating in good faith the issuing of the alert or its handling (e.g. as a witness). The author of a report made in good faith may not be punished, or be the subject of a discriminatory measure or direct or indirect reprisals, even if the facts reported do not prove to be justified after investigation.



8. SIGNATURE

As a Partner, I hereby confirm:

- **That I have received and fully read the present ADEO Donations and Sponsorships Code of Conduct.**
- **That I support and undertake to comply with its principles and that not complying with them may be considered as a breach of my obligations likely to lead to the application of the penalties specified above.**
- **That I will inform my own representatives, members and employees of this ADEO Donations and Sponsorships Code of Conduct as soon as they are in relationship with ADEO and that I will ensure their compliance.**

Name of **the Partner**:

Name and position
of representative:

Signature:

Signed in:

...../...../.....



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