

Summary of laws and regulations against corruption

Company policy

All the companies of the Transport Divisions of the Bolloré Group, its subsidiaries and affiliates comply with all existing laws and regulations such as:

- The U.S. "Foreign Corrupt Practices Act" of 1977;
- OECD Convention on Combating Bribery of 1997;
- The French law on combating corruption of 2000;
- The United Nations Convention against Corruption of 2003;
- The African Union Convention on Preventing and Combating Corruption of 2003;
- The "U.K. Bribery Act" of 2010, applicable since 2011 and which prohibits "facilitation payments"
- All local laws which most countries have adopted.

The general principle behind the prohibition of corruption

It is prohibited for companies, their employees or business partners from paying, offering or promising to pay money or to grant anything of value, whether directly or indirectly, to any individual or legal entity - private or public - in order to obtain an undue advantage.

Therefore, both private persons and government officials are in the scope of these laws.

Criminal conduct

There are two types of criminal conduct: active corruption and passive corruption.

- a. Active corruption = to pay a bribe (or a facilitation payment)**
- b. Passive corruption = to accept a bribe (or a facilitation payment)**

Assimilated forms of corruption

"Facilitation payments" are regarded as a form of corruption and as such can be prosecuted under most of above mentioned laws.

For guidance, the US FCPA is tolerating facilitation payments in very specific circumstances but most of the customers – even under US jurisdiction - forbid this kind of payment (at the Bolloré Group, facilitation payments are not authorized).

Sanctions

Depending on applicable jurisdiction, corruption sentences can amount up to 2M\$ per violation for companies and 250,000\$ for individuals with a possible imprisonment ranging between 5 to 10 years and above (Canada: 14 years).