



Gift and Hospitality Policy

Altice France



SFR **RMC** **BFM**

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Preamble

Gifts and invitations are common practices in business relations, they hail from a tradition of gratitude and politeness. However, in certain circumstances, they can create risky situations, that can lead to certain acts of corruption.

As a result, Altice France recognises the importance of managing these practices responsibly. It is therefore essential to clearly define our expectations in order to ensure that all interactions remain ethical and transparent. The Group's Gift and Hospitality Policy conveys these expectations and highlights the commitment of the Group and its employees to integrity and the fight against corruption and conflict of interest.

This policy is intended to guide our employees and managing these exchanges. Every employee must act with integrity and responsibility in order to ensure a proper conduct of their activity in the Group.

The Ethics and Compliance Department

Scope of application

This policy is addressed to the employees of Altice France Group, including those of other companies such as SFR SA SFR Fibre, Completel, as well as companies belonging to the Groupe News Participations et à NextradioTV¹.

It's applicable to all forms of gifts and invitations that employees may receive or offer to/from third parties to the Group. This policy excludes gifts or invitations offered or received between the Group's employees or between the Group companies.

Definitions

Advantage: a benefit, privilege or favour granted to someone, often in exchange for something in return.

Corruption: corruption can take the form of giving or receiving an advantage in exchange for a professional or personal service (bribe, improper gifts and invitations, sham jobs...etc.).

Employee: internal, external, or occasional employees of the Group (temporary or contract employees, apprenticeship students, interns, temporary workers, but also employees of subcontractors or consultants present on site, etc.).

Gift: material goods offered by an entity external to the Group. This policy does not apply to the sending or receiving of goodies².

Invitation: offered by companies external to the Group, including invitations to lunches and dinners and invitations to sporting or cultural events. This does not include invitations to trade fairs or professional events³, the purpose of which is to present offers, services, products, or technologies related to the Group's activities.

Public Officials: refers to any person vested with public authority, entrusted with a public service mission, or invested with an elective mandate, as well as any person working for public international organisations or entities directly or indirectly owned or controlled by the State.

¹ For the following Altice France Group subsidiaries, be it XPfibre, ERT/ATS, Coriolis, Prisma, Pritel and OMT et SRR, they should refer to their dedicated policy.

² Promotional or advertising items, including but not limited to key rings, clothing, stationery, cutlery, etc.

³ Only entries are not considered invitations within the meaning of the Gifts and Invitations Policy.

Third parties: include service providers, suppliers, prospects, customers (potential or current), competitors, French and foreign authorities, partners, investors, and agents (brokers and distributors).

1. Main challenges

This policy aims to protect the integrity of the Group and its employees by preventing the risk of corruption.

Although not all employees are exposed to the same risk of corruption, it is essential to note that this risk can manifest itself in many ways. This includes the offering, solicitation or acceptance of gifts and invitations.

These practices can lead to favours being exchanged for undue advantages, affecting the integrity of professional relations, and damaging the trust placed in the Group.

If an act of corruption is found to have been committed, severe penalties may be imposed on the employee concerned, as well as on the Group.

This policy fosters a climate of trust in current and future business relationships and encourages ethical business practices while guaranteeing freedom of competition.

2. What the Group prohibits

Any gift or invitation received or solicited with the aim of obtaining an undue advantage or influencing a decision constitutes an act of corruption. Employees are therefore asked to refuse any solicitation that could call into question their professional integrity or influence the professional decisions to be taken.

More specifically, the Group prohibits the following situations:

- Accepting or offering a gift or invitation during a call for tenders or during contract negotiations;
- Accepting or offering a gift or invitation prior to the signing of a Contract or for any modification of clauses, with the aim of obtaining an advantageous compensation;
- Accepting or offering a gift or invitation prior to the amendment of a law or regulation, in order to obtain an advantageous consideration;
- Accepting or offering a sum of money in any form whatsoever (e.g. cash, bank transfer, bank cheque, gift card, holiday voucher, etc.) or benefits in kind (e.g. a promise of employment);

- Accepting or offering a gift or invitation that does not comply with the applicable laws (e.g. receipt of a weapon for military use);
- Accepting or offering a gift or invitation that exceeds the thresholds set by the Group without the manager's agreement (see 3. How to act?);
- Agree to pass on their personal address to receive a gift or invitation or to send a gift or invitation to a third party's personal address;

Specific case: gifts or invitations may be offered by third parties from foreign countries, whose culture or tradition makes it difficult to refuse. In such cases, refusal may be seen as a sign of rudeness. In this specific case, we recommend that you send this Policy in the event of a gift or invitation that cannot be accepted.

Specific cases

This policy applies to all employees. However, to take into account certain aspects of the Group's activities, it is necessary to distinguish between invitations, networking or public relations events, meetings to represent interests (lobbying) and invitations that journalists may receive.

- **Public Relations Events (PR)**

The employees concerned are invited to ask themselves the following questions:

- Is the invitation made in a professional or personal context?
- Is the invitation considered work time or leisure time?

If the invitation is indeed in a professional context and is considered as working time, it should not be considered as an invitation within the meaning of this Policy.

- **Lobbying**

In the context of representation of interests, employees may receive or offer invitations to lunches. This policy does not apply to representation of interests; however, employees are asked to respect the general principles of this policy.

- **Journalists**

Because of the nature of their profession, journalists are regularly solicited by third parties for gifts or invitations. It is therefore crucial to ensure that these practices do not affect their journalistic integrity.

We expect our journalists not to accept or solicit gifts or invitations that might compromise their impartiality.

They may accept invitations, such as business meals, provided this does not affect their journalistic independence and does not create an implied obligation to produce editorial content in return.

Each proposal must be carefully evaluated to assess its potential impact on the objectivity and integrity of their journalistic work.

3. How to act?

➤ **Questions to consider**

- Is the gift or invitation covered by the prohibitions mentioned above?
- Is the purpose or outcome of the gift or invitation to influence my decision-making?
- Could the gift or invitation call into question the integrity of the Group and that of the employee?
- Is the gift or invitation received or offered in a professional context?
- Is the gift or invitation received on a regular basis?
- Does the gift or invitation I wish to offer comply with the recipient's Gift and Hospitality Policy?

➤ **Checking applicable thresholds**

The Group has put into place thresholds for accepting⁴ gifts and invitations.

Gifts	Meals	Invitations
50€	75€	150€

Please note: All gifts or invitations offered to a Public Official must be systematically authorized by the manager.

How to recognize the value of the gift or invitation?

It is important to take into consideration, when possible, the **market value** of the gift or invitation.

- In case of a gift, an internet search can help you to determine the value.
- In case of an invitation, it is highly recommended to ask sender for its value.

If you encounter any difficulties, please do not hesitate to contact the Ethics and Compliance Department.

Checking applicable thresholds does not apply to the gifts or invitation received or offered within the companies of the Altice France Group.

⁴ Les seuils indiqués ci-dessus sont aussi applicables aux cadeaux ou invitations offerts aux tiers du Groupe. Il est demandé aux collaborateurs de favoriser l'envoi de goodies.

➤ **Manager's authorization (n+1) in case of exceeding the thresholds**

When the gift or invitation exceeds the indicated thresholds, the employee must contact his or her manager n+1 to obtain their authorisation. The request must be made by e-mail, for evidentiary purposes.

A gift or invitation may only be accepted or offered with the express agreement of the manager.

➤ **Keeping a record of gifts and invitations**

Each employee must document in an Excel/Word record any gift or invitation received or offered, accepted, or refused. It should include the nature of the gift or invitation, the estimated value, the source or recipient, the date received or sent and, if refused, the reasons for refusal.

The record may be kept individually, or collectively by team or department, at the discretion of managers.

The Ethics and Compliance Department launches a campaign to identify these registers twice a year.

➤ **Implementation of this Policy**

The Gift and Hospitality Policy is available on the Compliance intranet in the "*Gifts and Invitations*" section. It is also given to each new employee joining the Group.

All employees of the Altice France Group are required to read this Policy and to take part in the awareness-raising activities organised within the Group by the Ethics and Compliance Department.

If an employee or a third party suspects a breach of this Gift and Hospitality Policy, they may make use of the internal alert system set up by the Group available at the following URL: <http://alertealticefrance.sfr.com>.

In the event of a proven breach of this Policy, disciplinary sanctions will be applied. In addition, any action taken in violation of applicable anti-corruption laws and regulations may result in criminal penalties for the perpetrator and their employer.

If in doubt, don't hesitate to ask your manager, your Human Resources correspondent or the Ethics and Compliance Department for advice.

4. Responsibility and Policy Control

The Gifts and Hospitality Policy is the responsibility of the Ethics and Compliance Department. It is reviewed and updated annually.

- **Level 1 Control:** Level 1 control is the responsibility of management, who ensure that employees declare gifts and invitations offered or received.
- **Level 2 Control:** Level 2 controls are the responsibility of Internal Control Department, which carries out annual checks to ensure that Level 1 controls are being properly applied and complied with.
- **Level 3 Control:** Level 3 control is the responsibility of the Internal Audit Department.

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