

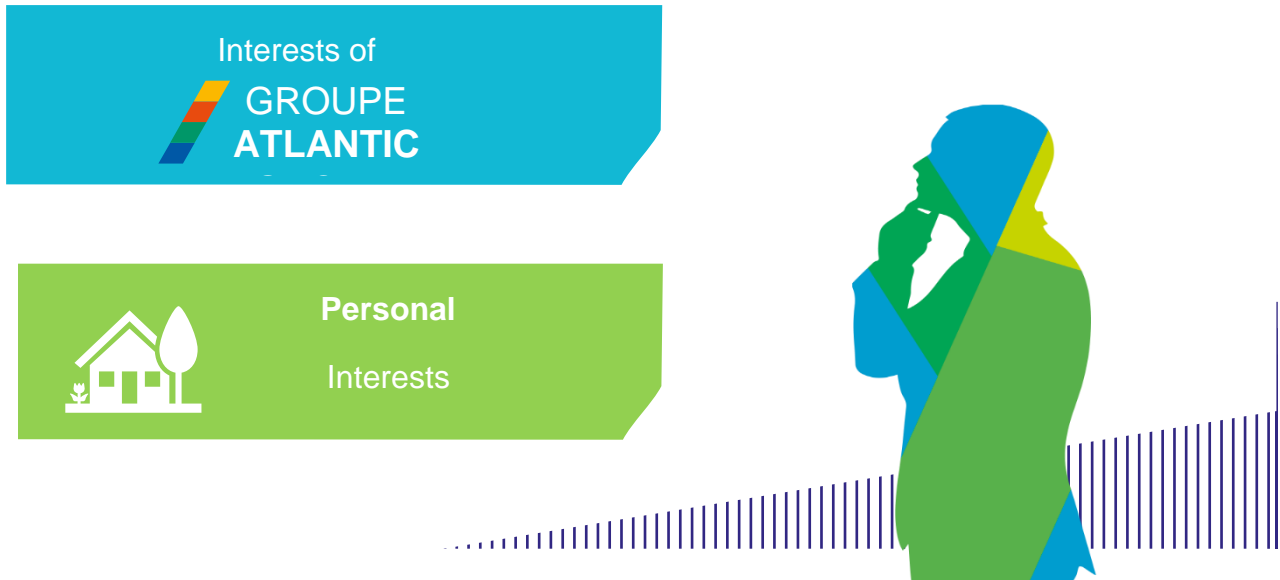
# CHARTER ON PREVENTING CONFLICT OF INTEREST / 2025



# 1 WHAT IS A CONFLICT OF INTEREST?

## / 1.1 Definition

Conflict of interest refers to any situation in which the personal interests of an employee (or those of an entity or individual to whom he or she is related or close) conflict with the interests of Groupe Atlantic.



**Conflict of interest may constitute a breach of the employee's duty of loyalty to the employer.**

**Moreover, putting one's personal interests ahead of those of Groupe Atlantic in return for an undue advantage may constitute an act of corruption.**

### Examples:

- It is a conflict of interest for a purchasing manager to select a supplier who is a family friend, when the latter does not offer products of sufficient quality.
- It is a conflict of interest for a commercial manager to approve the hiring of a customer's son, even though he does not have the skills required for the position.
- It is a conflict of interest for a marketing manager to select his niece's events agency to organize a seminar, in disregard of the rules governing calls for tender.
  - ⇒ If, in addition, the employee acts in return for undue advantages (e.g. gifts and invitations etc.), there is a risk of corruption.

It is not in itself forbidden for employees to work with people they know, but they must always be transparent and inform their line manager.

## 2 BEST PRACTICES TO BE OBSERVED

Any employee must always:

**Make decisions loyally, honestly and objectively, in the best interests of the Group.**

**Ensure that his/her activities, relationships and personal interests do not conflict with those of Groupe Atlantic, and do not affect his/her judgment and ability to take proper decisions.**

In the event of a potential conflict of interest:

**The employee must inform his/her manager.**

**The manager must take all necessary measures to assess the existence of a conflict of interest and put an end to it if necessary.**

Examples:

- The manager must ensure that the person in a conflict-of-interest situation does not participate in any decision-making related to the conflict of interest, and/or that the decision is taken in a collegial manner.
- The manager can notify the business partner of the situation.

**It is necessary to keep a written record (ex: mail) of the solution found to the potential conflict of interest, so as to be able to provide a proof in the event of a control/audit.**

If in doubt, please contact:

[compliance@groupe-atlantic.com](mailto:compliance@groupe-atlantic.com)



As a reminder, any employee can also report a breach of ethics and compliance rules (anonymously if preferred), on the GA Alert platform (<https://groupe-atlantic.signalement.net/entreprises>).

