

In pursuance of our constant opposition to any form of corruption, the ACS has adopted the French MiddleNext Anti-Corruption Code of Conduct which, in turn, refers to the United Nations Convention against Corruption.

This policy statement is intended to inform all ACS employees on the sensitive question of *gifts* and *invitations*, whether received or given, and to complete the MiddleNext Anti-Corruption Code of Conduct.

A «*gift*» is a benefit, of any nature, offered or received by a ACS employee.

An «*invitation*», with or without travel, may be:

- either professional, within the framework of ACS business development or business management (restaurant, event, congress, study tour, site visit, conference, trade fair ...);
- or personal (leisure activities): in this case, the invitation constitutes a *gift*.

*Gifts* and *invitations* are part and parcel of business life, considered tokens of courtesy which allow partners to maintain excellent professional relationships. In certain circumstances, however, *gifts* and *invitations* may resemble or be perceived as corrupt practices and thus be considered as the means of influencing a decision or favouring a company or an individual.

Thus ACS accepts that its employees may offer and receive gifts and invitations, on condition that the principles traced in this policy are respected.

All *gifts* and *invitations* received or offered by a ACS employee must respect the following principles:

1. they must not entail any obligation, counterpart or unfair advantage;
2. they must be reasonable;
3. they must be open, clear and above-board;
4. they must comply with applicable procedures, legislation and regulations.

This policy may be completed by one or more specific procedures, within each ACS entity, notably to allow for local regulations and particularities. These specific procedures may define rules which are stricter than the present Group policy, but under no circumstances can these rules be less strict.

Guennady Tryukhan, General Director