



## Group Procurement Code of Ethics

Among the basic principles that should underlie our business processes, independence with respect to our vendors is clearly one of the most critical.

Compliance with this principle requires following certain basic rules, some obvious and others less so. These rules are listed below in this "purchaser's code of ethics".

Most of these rules apply to all kinds of purchases, and only rarely pertain specifically to information systems and technology.

### **1. Disclosure/Confidentiality**

Vendor offers are strictly confidential, as is the content of any contracts entered into. Under no circumstances, should this information be communicated outside the Group.

On the other hand, nothing prohibits setting an objective with vendors in the course of negotiations, provided that this same objective is expressly set with all vendors, without making reference to terms and conditions that may be offered by a particular vendor.

### **2. Fairness/Competitive bidding**

Although we are not bound by any legislation with respect to invitations to tender, we are morally bound by professional- and performance-related requirements to treat all potential players fairly when it comes to consultations on all significant purchases.

### **3. Objectivity/Neutrality**

Above all, it is prohibited to accept consideration of any kind from existing or potential vendors.

In particular, participation in a company belonging to a vendor in exchange for consideration is prohibited, for the purchaser and members of his or her family.

Accepting personal gifts in the form of products sold by vendor is prohibited. "Perishable" gifts should be refused wherever possible, failing which, they should be donated to AXA Atout Cœur.

Participation in any trip, seminar, visit or event of any kind organized by a supplier shall be submitted to the manager for prior approval.

The basic ground rule with respect to such is to pay our own expenses for travel and accommodation, barring exceptional circumstances, which shall also be submitted to the manager for prior approval.

### **4. Transparency/Traceability**

All salient items with respect to a purchasing decision must be recorded in a document that is kept on file at least until the amortization period for the property in question has been completed.

In particular, this document should contain the technical and financial factors that influenced the choice, as well as the opinions and authorizations that preceded it, pursuant to the procedures in force at the time the choice was made.