

ANTI-BRIBERY AND CORRUPTION POLICY

2025



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A MESSAGE FROM CEO NICOLAS JOLY



Dear Colleagues,

Business ethics ensure the long-term performance of our Company. In order to grow, we need to operate in transparent markets in which all competitors enjoy the same opportunities.

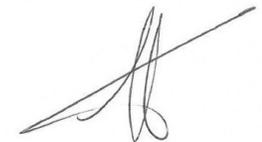
For this reason, ICADE has developed an ethical framework to assist you in your day-to-day business operations. I am referring to the Code of Ethics with which you are all familiar.

I have now decided to broaden and clarify the scope of this Code through the following Anti-Bribery and Corruption Policy. It sets out our rules for preventing and detecting corruption and influence peddling in all their forms, in strict compliance with regulations, the Group's Code of Ethics and applicable internal policies.

This new Policy is mandatory and has been appended to ICADE's Employee Handbook.

The Compliance Department is available to answer any questions relating to the application of this Policy, especially as it relates to helping you make difficult ethical decisions at work.

The Executive Committee and I would like to thank you in advance for your continued vigilance in complying with all the rules of good conduct set out in this Policy. Through your compliance, the Group will be able to maintain the highest level of integrity, safeguard its reputation and image and ensure the success of our business operations.



1

**WHY DO WE NEED
AN ANTI-BRIBERY
AND CORRUPTION
POLICY?**

WHY DO WE NEED AN ANTI-BRIBERY AND CORRUPTION POLICY ?



CORRUPTION DISTORTS THE FAIR, ORDERLY AND EFFICIENT FUNCTIONING OF MARKETS.

ICADE's Anti-Bribery and Corruption Policy aims to:



1/ Prevent any behaviour that could be viewed as corrupt (e.g. embezzlement, bribery, favouritism, conflicts of interest, gifts and undue advantages, etc.) or akin to influence peddling with any stakeholder.



2/ Ensure fair commercial practices.



3/ Safeguard ICADE's reputation while pursuing its Purpose

4/ Comply with Law No. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and modernisation of the economy (French "Sapin 2 Law") and recommendations from the French anti-corruption agency (AFA) under which the Policy « demonstrates the will of the governing body to commit the organisation to preventing and detecting corruption ».

To that end, this Policy will:

- ✓ **Identify and define** the risks associated with corruption and influence peddling to which ICADE employees are exposed
- ✓ **Present** concrete examples of corruption and influence peddling in addition to the best practices to be adopted by employees based on the Group's risk map

1. WHY DO WE NEED AN ANTI-BRIBERY AND CORRUPTION POLICY ?

Consequently, whenever you think you are confronted with an issue, ask yourself the following questions :

Is it legal ?



Does it comply with the Anti-Bribery and Corruption Policy?

Can I justify my choice based on business ethics?



2

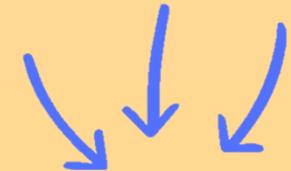
**WHO IS COVERED
BY THE POLICY
AND HOW TO USE
IT?**

WHO IS COVERED BY THE POLICY AND HOW TO USE IT?



This code came into force on 18/10/2021.

It is available on the Group's intranet and corporate website.



This Policy is one of the core documents underpinning the compliance programme. It is in addition to, and not in replacement of, the Code of Ethics and internal policies and has been appended to ICADE's Employee Handbook.

Who is concerned ?

It applies to all individuals working on the ICADE Group's payroll, i.e. managers and staff members, such as employees (whether permanent or fixed-term), apprentices, external and/or casual workers (temps, interns or external consultants with an ICADE e-mail address), including when they work away from the Group's premises.

The involvement of an employee in a corrupt act constitutes professional misconduct that may trigger disciplinary measures, without prejudice to any legal action or administrative, civil or criminal sanctions.

The Code of Ethics is also available on the Group's intranet and corporate website.

Its purpose is to establish a body of guiding principles, compliance with which will ensure that all employees share a common reference in terms of business ethics.



3

**WHAT ARE WE
TALKING ABOUT?**

WHAT IS BRIBERY?



Bribery is the « *soliciting or accepting of a gift or benefit of any kind by persons exercising a specific function (whether public or private) as an inducement to act, or refrain from acting, within the scope of their duties. A distinction is made between active bribery (offering persons exercising a specific function a gift or benefit of any kind) and passive bribery (whereby such persons accept the gift or benefit)* ». (Source : Transparency International)

Corruption remains an unacceptable practice and ICADE applies a zero tolerance policy in this area.

It may be **direct** (made by a Group employee) or **indirect** (made by a Group third party, such as a trading partner or an intermediary, on behalf of ICADE).

Benefits, either received or given, can take the form of **money, gifts and hospitality, promises of employment, donations and sponsorship, discounts and rebates, as well as any other preferential treatment** (e.g. favourable prequalification requirements, conflicts of interest involving relatives or friends, etc.).

Various methods may also be used, including **kickbacks, improper remuneration, redistributing a portion of variable pay, expense claims, etc.**



WHAT ARE WE TALKING ABOUT ?

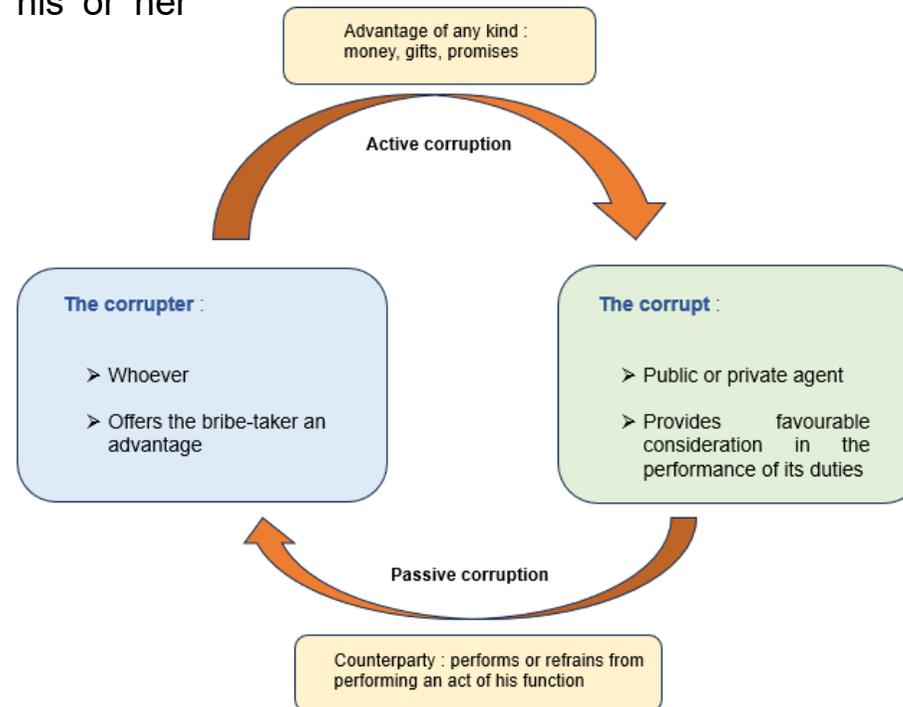
The briber (anyone) offers an advantage of any kind (money, gift, promise, etc.) to the bribe-taker (public or private official) in exchange for something in return.

Consideration: The bribe-taker performs or refrains from performing an act in his or her official capacity.¹

The briber is not necessarily the source of the corruption, but may simply be responding to a solicitation from the bribe-taker.

The briber = perpetrator of the offence of active bribery

The bribe-taker = passive bribe-taker



Example 1 :

An employee pays money to a mayor to obtain planning permission.

Example 2 :

A customer (lessee) invites an employee to a 5-day conference, including airfare, hotel and activities, so that he can negotiate more advantageous terms for the renewal of the current lease.

Example 3 :

A supplier hires an employee's son-in-law without checking his skills to ensure he is selected for a tender.

¹Source : French Anti-Corruption Agency (AFA) and ICADE.

4

WHAT IS
INFLUENCE
PEDDLING?

WHAT IS INFLUENCE PEDDLING ?

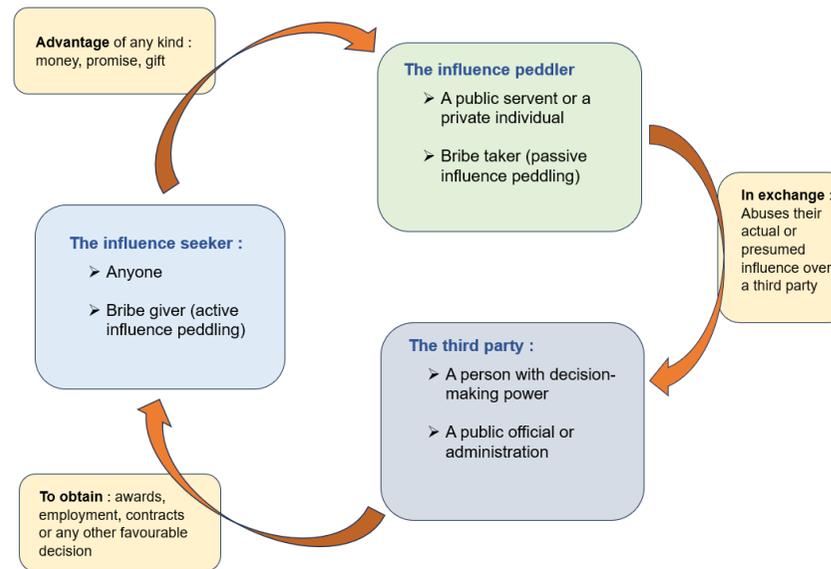
Influence peddling refers to an « *act by a person monetising their influence, real or perceived, to obtain a favourable decision from a third party. It involves three participants, namely the influence seeker (the one who provides benefits or gifts), the influence peddler (the one who uses the influence they possess owing to their position) and the target with decision-making power (public authority, government agency, magistrate, expert, etc.). French criminal law distinguishes between active influence peddling (the actions of the influence seeker) and passive influence peddling (the actions of the influence peddler)* ».

(Source : Transparency International)

1/ The beneficiary (anyone) offers an **advantage of any kind** (money, gift, promise, etc.) to an influential person (public or private official) **in exchange for something in return**.

2/ The influential person **abuses his real or supposed influence** over a third party (a person with decision-making power such as a public authority or public administration).

3/ **With the aim of the beneficiary** obtaining distinctions, jobs, contracts or any other favourable decision.



Source : French Anti-Corruption Agency (AFA) and ICADE.

Example 1 :

An employee paid money to a mayor to exert influence over a federation of municipalities so that it would award a contract to ICADE.

Example 2 :

An employee carries out work free of charge for a public official with the aim of the latter using his influence over the town planning department to ensure that planning permission is granted to ICADE.

5

**HOW TO ACT
WITH INTEGRITY?**

HOW TO ACT WITH INTEGRITY ?

What you should do ?

- Perform **integrity due diligence on customers and third parties (KYC/KYS)** depending on the nature of the relationship under consideration.
- **Refuse a benefit that has the potential to compromise your impartiality or impair your judgement.**
- **Routinely report any solicitation or suspected corruption to your line manager or the Compliance Department or use the Whistleblowing Policy available on the intranet.**

What you should not do ?

- **Solicit, propose or offer an undue advantage, in any form whatsoever, in order to obtain a contract or any other favourable decision** on behalf of the ICADE Group.
- **Receive or accept an undue or unjustified advantage** in order to act or refrain from acting in favour of a third party (e.g. supplier or customer).



EXAMPLE N°1

A supplier with whom I usually work wants to offer me a computer worth €1,500 in order to increase their chances of winning the next tender.

What should I do?

Accepting this €1,500 gift could impair your objectivity and independent judgement with regard to this supplier and even damage the Group's reputation. It is also in violation of our internal policies. As a result, you must:

1/ **Refuse** the gift because accepting such an undue advantage could be qualified as **passive bribery**.

2/ **Inform** the Compliance Department and your line manager in writing.

6

WHAT ACTIONS
SHOULD YOU
TAKE AS AN
EMPLOYEE?

RULES ON GIFTS



General rules

Gifts exchanged between business partners are courtesies intended to establish and maintain positive working relationships. As a matter of principle, accepting or giving so-called “corporate” gifts and invitations to events or meals is authorised by Icade within very reasonable limits (mentioned below) and must be proportionate to the business objective being sought.

Employees should consider whether a gift received or given is likely to affect their impartiality or that of the other person.

If the answer is yes, the gift should be politely refused or not given. If you are in any doubt, your line manager or the Compliance Department should be consulted.

What you should do

Comply with the ICADE Group’s policy on gifts:

- **The Compliance Department should always be made aware of any gift received from the first euro** via the intranet’s Compliance Portal.
- **The value of gifts received by an employee** may not exceed **€250 per year** (except in the case of redistribution to team members – to be specified in the declaration).
- **Gifts given to third parties must be approved in advance by line managers** (except ExCo members who only need to declare them). **Employees must declare them from the first euro on the Compliance Portal. The value of gifts given should not exceed €250 per year for the same third party.**
- Not offer or accept gifts **in the form of cash, gift cards, gift vouchers or equivalents.**
- Not send a gift to or receive one at **a personal address.**
- **Not give or accept gifts at key moments for the business, particularly during tender periods, contract negotiations and contract renewals.**

Learn More



POLICY ON INVITATIONS RECEIVED BY EMPLOYEES TO CULTURAL AND SPORTING EVENTS



General rules

Comply with the ICADE Group's policy on invitations received:

- Invitations received by employees must be **approved in advance by line managers** (except ExCo members who only need to declare them) **via the Compliance Portal**.
- Invitations that are not business related **may be accepted if they fall below the threshold of €250 per year and per employee**. They must, however, be declared in the "Gifts" section of the Compliance Portal.
- The invitation received **is solely for the employee in question** (with no exception made for close friends and relatives).

What you should not do ❌

- **Accept** invitations on a regular basis or at key moments for the business, particularly during tender periods, contract negotiations and contract renewals.
- **Accept** payment of expenses associated with the invitation (transport, accommodation, etc.)



Increased vigilance is required to ensure compliance with these rules when the third parties concerned **are public officials and local and national elected representatives**.

Learn More



Procedure, Guide and Instructions for use concerning 'Gifts and invitations' available on the intranet

RULES GOVERNING INVITATIONS OFFERED BY ICADE TO CULTURAL OR SPORTING EVENTS



General Rules

Comply with the ICADE Group's policy on invitations extended:

- Individual invitations extended by Icade must be **approved in advance by line managers** (except ExCo members who only need to declare them) and reported on an ongoing basis **on the Compliance Portal**.
- Invitations involving box seats or pursuant to sponsorship and patronage agreements must be logged in a summary table which should be sent to Compliance each year.
- The invitation extended **is solely for the third party in question** (with no exception made for close friends and relatives).



What you should not do



- **Extend** invitations on a regular basis or at key moments for the business, particularly during tender periods, contract negotiations and contract renewals.
- **Offer** payment of expenses associated with the invitation (transport, accommodation, etc.)

Increased vigilance is required to ensure compliance with these rules when the third parties concerned **are public officials and local and national elected representatives**.



BUSINESS MEALS



EXAMPLE N°2

A potential supplier invites me to lunch in an expensive restaurant during a tender period.

What should I do ?

Accepting a lunch invitation is allowed. However, several criteria must be taken into account, namely the timing of the invitation (**tender or contract renewal period**), **frequency, amount and recipient, public or private sector customer.**

In this case, the cost of the invitation is high and the period in which it takes place presents a corruption risk. **It is therefore not permitted.** If you are in any doubt, your line manager or the Compliance Department should be consulted.

BUSINESS MEALS

Invitations and business meals within a transparent professional framework must be **proportionate to the status of the guest, very reasonable in frequency and in line with the expense reimbursement process.**

What you should not do ? ❌

- **Offering / Accepting business meals on a regular basis or at certain times in the life of a business, in particular during calls for tender or when negotiating or renewing a contract.**

Increased vigilance is required to ensure compliance with these rules when the third parties concerned **are public officials and local and national elected representatives.**

SPONSORSHIPS AND PATRONAGE

EXAMPLE N°3



The mayor of the city in which ICADE wants to build a property complex asks me to sponsor a volleyball club during the review period of the first building permit filed in that same city. He explains that this is a precondition for obtaining a favourable decision.

What should I do ?

This request could be granted, but not during the permit review period. Granting such a request would expose the Group to accusations of active bribery, since Icade's sponsorship would be the quid pro quo required by the mayor in order to obtain the building permit. **The employee must decline this offer.** They should notify their line manager and/or the Compliance Department.

Patronage

Similar to a charitable contribution or donation, patronage represents any financial or material support given to a charity or any non-profit organisation (association) with no direct or indirect consideration given in return.



Sponsorship

Sponsorship is a form of communication that is part of a commercial approach. It may involve the Group providing financial or material support to an organisation, event or individual in return for various forms of advertising exposure.



Learn More



ICADE's policy on sponsorships and patronage is available on the intranet².

² For more information please refer to: **ICADE Group's policy on sponsorships and patronage and policy for assessing the integrity of third parties ("KYS")**

SPONSORSHIPS AND PATRONAGE

What you should do ?

- Agree to be a patron for good causes in line with **ICADE's image and commitment to the community** (culture, sports, environment, health, solidarity, etc.)
- Ensure that sponsorships, patronage and charitable contributions **are approved by the relevant manager, exclude third parties with questionable reputations and meet the following requirements:**
 - **They must be subject to prior third party due diligence (KYS)**
 - **They must not be intended to gain undue advantage or influence**
 - **They must be documented in detail and include, where appropriate, an anti-bribery and corruption clause**

What you should not do ?

- Engage in sponsorships and patronage intended to **influence the specific decision of a stakeholder or with the aim of establishing or maintaining a business relationship, or in return for an undue advantage**
- **Provide cash support through charitable contributions, sponsorships or patronage**
- Make charitable contributions to an **unregistered bank account on behalf of the recipient entity**
- Pay contributions into an account located in a country **other than the one in which the recipient has its registered office and/or operates**
- Engage in sponsorships and patronage:
 - **during tender periods**
 - **likely to give rise to a conflict of interest**
 - **for the purpose of directly or indirectly financing a political party**

CONFLICTS OF INTEREST



General rules

Conflicts of interest can lead to corruption when individuals **abuse their position to obtain or give an undue advantage**.

A conflict of interest arises when the independent, impartial and objective performance of an employee's duties is likely **to be influenced by another public or private interest that differs from the one they have a professional responsibility to defend**. (Source : *Transparency International*).

ICADE has adopted a conflict of interest policy which is available on the intranet³.

Learn More



³ For more information please refer to: *ICADE Group's policy on conflicts of interest*



CONFLICTS OF INTEREST

What you should do

Identify actual, apparent or potential conflicts of interest (prior to the transaction or in any case as soon as you become aware of them) and inform your line manager and the Compliance Department in writing by completing a declaration form via the Compliance Portal relating to

- 1/ Any real estate activity over the past two years as an employee of a supplier, business partner or competitor
 - 2/ Any significant economic or financial interest in a supplier, customer or company competitor
 - 3/ Any appointment as a corporate officer or member of a board of directors of a competitor, an association or a company that does business with ICADE
 - 4/ Any personal relationship with an introducer, broker, supplier, customer, business partner or competitor (relative or friend)
 - 5/ Any family member who works at ICADE
 - 6/ Any situation likely to create a permanent or temporary conflict with your duties
 - 7/ Any elected office (city council member, mayor, etc.)
- Obtain written approval from your line manager and feedback from the Compliance Department prior to any involvement in a decision-making process related to the declared conflict of interest

CONFLICTS OF INTEREST

What you should not do? ❌

- Participate in the Company's decision-making process when it involves an entity in which you or a member of your family has a private interest
- Use your position at ICADE or information learned on the job for personal gain or for the benefit of family and friends
- Work systematically or inappropriately with a supplier because of the close relationship maintained with said supplier
- Engage in gainful employment with a supplier, customer or competitor
- Hold a significant financial interest in a supplier, customer or competitor of ICADE without prior written approval from your line manager addressed to the Head of Compliance

EXAMPLE N°4



I am an ICADE employee. My father is a public policy maker (elected official, council chief executive, etc.) in a city in which ICADE is planning to acquire an office and residential complex in need of a major overhaul.

What should I do ?

You must declare the conflict of interest to your line manager and the Compliance Department (via the Compliance Portal). The Compliance Department will then ask you to withdraw from any decision-making process for ICADE projects in this city.



EXAMPLE N°5

FACILITATION PAYMENTS

Definition

Facilitation payments intended to facilitate or expedite certain administrative formalities are prohibited as they are akin to bribery. They refer to:

- Improper
- direct or indirect payments
- made to public servants
- for the purpose of completing administrative formalities which should be obtained through proper legal channels
- to induce them to perform their duties more efficiently and diligently

(Source : Transparency International)

What you should do? ✓

- **Refuse** all requests for facilitation payments, **except for compelling reasons (health or safety of an employee)**
- **Inform** your line manager and the Compliance Department **of any facilitation payment requests**
- **Document** the reasons for and circumstances surrounding any facilitation payment request received by one of the Icade Group's employees (if the request could not be refused because of risks to the health or safety of employees)

What you should not do ? ✗

Make payments to a public authority in order to expedite or facilitate an administrative procedure

I am being pressured by my immediate supervisor because it is taking “way too long” to obtain a building permit for the latest project being developed. The town planner suggests that I opt for a new procedure for expediting the processing of my application at a cost of €500.

Is that allowed?

No, because handing over this money is akin to a facilitation payment and hence a bribe. You cannot make this type of payment under any circumstances. If you are in any doubt, you can forward your questions to the Compliance Department.

7

WHAT
STAKEHOLDER
DUE DILIGENCE
SHOULD I
PERFORM ?

WHAT STAKEHOLDER DUE DILIGENCE SHOULD I PERFORM ?



General rules

THIRD-PARTY PARTNERS (SUPPLIERS, INTERMEDIARIES, SELLERS, ASSOCIATES)

The ICADE Group has business relationships with many third parties which may expose ICADE to corruption risks. These business partners include suppliers (of goods, services, works), business intermediaries (introducers, brokers), sellers (of land and buildings) or partners in relation to joint ventures (JVs), mergers and acquisitions and co-development projects⁴.

Due diligence conducted on these third parties should be commensurate with the amount and method of remuneration, the nature of the service as well as to the country in which it is performed and the third party is registered.

⁴ For more information please refer to: *The ICADE Group's policy on assessing the integrity of third parties (KYS)*.

EXAMPLE N°6



A business intermediary (broker or introducer) offers to hire your companion who is actively looking for a job in the real estate sector without verifying her skills or interviewing her. In return, the intermediary asks you for a higher commission.

What should I do?

If you accept this request, the undue advantage given is considered bribery. You must turn down this request and notify your line manager and the Compliance Department.

It should be noted that since a relationship with a business intermediary is risky by nature, a higher degree of vigilance is required. It is advisable to use the standard remuneration framework and create a KYS file for new suppliers or contract renewals.

WHAT STAKEHOLDER DUE DILIGENCE SHOULD I PERFORM ?



What you should do

- Perform integrity due diligence adapted to the level of risk of the third party (KYS)
- Clearly set out the reasons, objectives and payment methods for remunerating or re-invoicing the third party
- Ensure that the third party (supplier/ intermediary) has the technical and financial capabilities to carry out the assigned task
- Formalise/document all new relationships in compliance with the ICADE Group's existing delegation of authority rules and legal policy
- Ensure that an anti-bribery and corruption clause is included in the contracts of "at-risk" suppliers
- Make the ICADE Group's Code of Ethics available to third parties and the Responsible Procurement Charter to suppliers
- Comply with rules on requests for quotation and/or competitive bidding when applicable

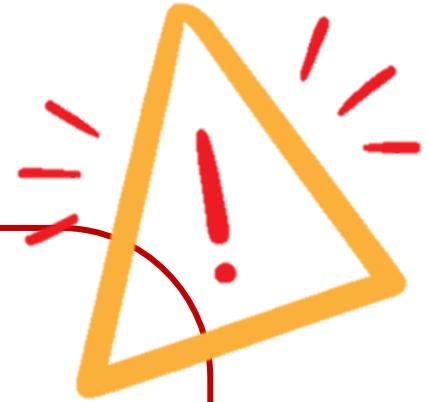
EXAMPLE N°7

A long-standing supplier is contractually bound to provide building services that include security, landscape maintenance and upkeep. As a vigilant ICADE employee, you realise that the supplier bills you for all of these services even though they are only partially performed. Upon telling them this, they offer you a sum of money paid directly into your personal account in return for which you will not report this information to your line manager.

What should I do ? This can be characterised as billing for services not rendered and attempted bribery. This fact is concealed in a contract whose purpose appears to be lawful but which provides for non-existent services. In this case, you should:

- 1/ Have the Accounting Department block the invoice**
 - 2/ Refuse the supplier's offer**
 - 3/ Inform the Compliance Department and your line manager.**
-

WHAT STAKEHOLDER DUE DILIGENCE SHOULD I PERFORM ?



What you should not do ?

- Make cash payments
- Make payments without proof of performance and supporting invoices
- Use the services of a supplier or enter into a partnership directly without performing the necessary due diligence
- Give/offer an undue advantage to a third-party partner in return for the Icade Group being favoured in any selection process or to facilitate the signing of a contract
- Engage with a third party that :
 - does not cooperate in the selection process and prior anti-corruption due diligence and refuses to comply with the Code of Ethics and/or Responsible Procurement Charter
 - is viewed unfavourably by the Compliance Department and the Executive Committee

WHAT STAKEHOLDER DUE DILIGENCE SHOULD I PERFORM ?

General rule

Customers⁵

The ICADE Group sells and leases to customers that have been subject to reasonable due diligence⁶.

The ICADE Group prohibits the provision of benefits to customers (or potential customers) that would in turn:

- Make it easier to obtain a contract
- Favour the ICADE Group in the context of a tendering process (favourable pre-qualification requirements, award criteria)

⁵ A customer is any natural or legal person with whom the ICADE Group has a contractual relationship (actual customer) or seeks to develop such a relationship (prospective customer). A customer may be a public or private entity

⁶ For more information please refer to: The ICADE Group's policy on assessing the integrity of customers (KYC).

What you should do?

Perform integrity due diligence adapted to the customer's level of risk in compliance with KYC procedures (note that a KYC check is mandatory on all buyers and on tenants whose annual rent exceeds €120,000 excluding taxes and service charges)

What you should not do



Offer an undue advantage, in any form whatsoever, in order to obtain or retain a contract

EXAMPLE N°8



I just signed a major contract with a customer and I want to invite him to lunch to celebrate.

Is this allowed?

If the invitation is for a reasonable amount and commensurate with the status of the guest, it can be extended to the customer because it is a business lunch that takes place after the signing of a contract.

In this respect, it is important to remember that attention must always be paid to the timing of the invitation, its cost and the aim pursued (to express gratitude, not to be confused with an attempt at active bribery).

Learn More



The **Know Your Customer (KYC) policy** for the ICADE Group is available on the intranet

WHAT STAKEHOLDER DUE DILIGENCE SHOULD I PERFORM ?

General rule

PUBLIC SERVANTS

The ICADE Group has a working relationship with many public servants who may expose Icade to risks of bribery and corruption (it should be noted that penalties for bribery in the public sector are double those for the private sector). A public servant is an individual who is a representative of a governmental authority or holds elected office, with the power to perform or influence administrative decisions.

Among others, ICADE employees may be required to interact with public servants working for:

- Local government (especially in regard to the awarding of contracts or permits)
- Public sector companies
- Regulatory and supervisory authorities
- Judicial authorities
- Etc

EXAMPLE N°9 :



I would like to hire a former elected official who held office in a city where ICADE has real estate projects.

What should I do?

If the hiring process is properly followed and the employee has the required qualifications, this may be acceptable provided the former public official completes a conflict of interest declaration via the Compliance Portal.

The Compliance Department will ask him not to intervene in the negotiation and decision-making processes involving the city in which he served for three years following the end of his term of office.

WHAT STAKEHOLDER DUE DILIGENCE SHOULD I PERFORM ?



What you should do?

- Be more vigilant when dealing with public servants (for example, refrain from attending a meeting with a public policy maker alone as part of contract negotiations)
- Ensure that ICADE meets the qualification requirements for public tenders

What you should not do

- Offer an undue advantage, in any form whatsoever, in order to obtain a contract or any administrative decision on behalf of the ICADE Group
- Provide a benefit (e.g. gift or invitation) to a public servant as part of a tender process
- Solicit a public servant to obtain non-public information or a decision in an unlawful and non-transparent manner
- Support a political party, candidate or elected official
- Ensure or expedite routine administrative decisions
- Attempt to improperly influence decisions

8

COMPLYING WITH THE ANTI- BRIBERY AND CORRUPTION POLICY

TRAINING



Training

A mandatory training and awareness programme for all employees ensures compliance with the Group's Anti-Bribery and Corruption Policy.

Failure to complete mandatory training modules may lead to disciplinary action.

Employees identified as the most "at risk" receive face-to-face training each year.





Whistleblowing system

All Icade workers are responsible for preserving the Company's integrity and reputation. Whistleblowers may be:



Internal

- Icade workers (employees, non-employees and other workers)
- Members of the Icade Group's governance bodies

Third parties

- Former employees, job applicants
- Icade Group's counterparties and their subcontractors
- Holders of voting rights at General Meetings (shareholders)



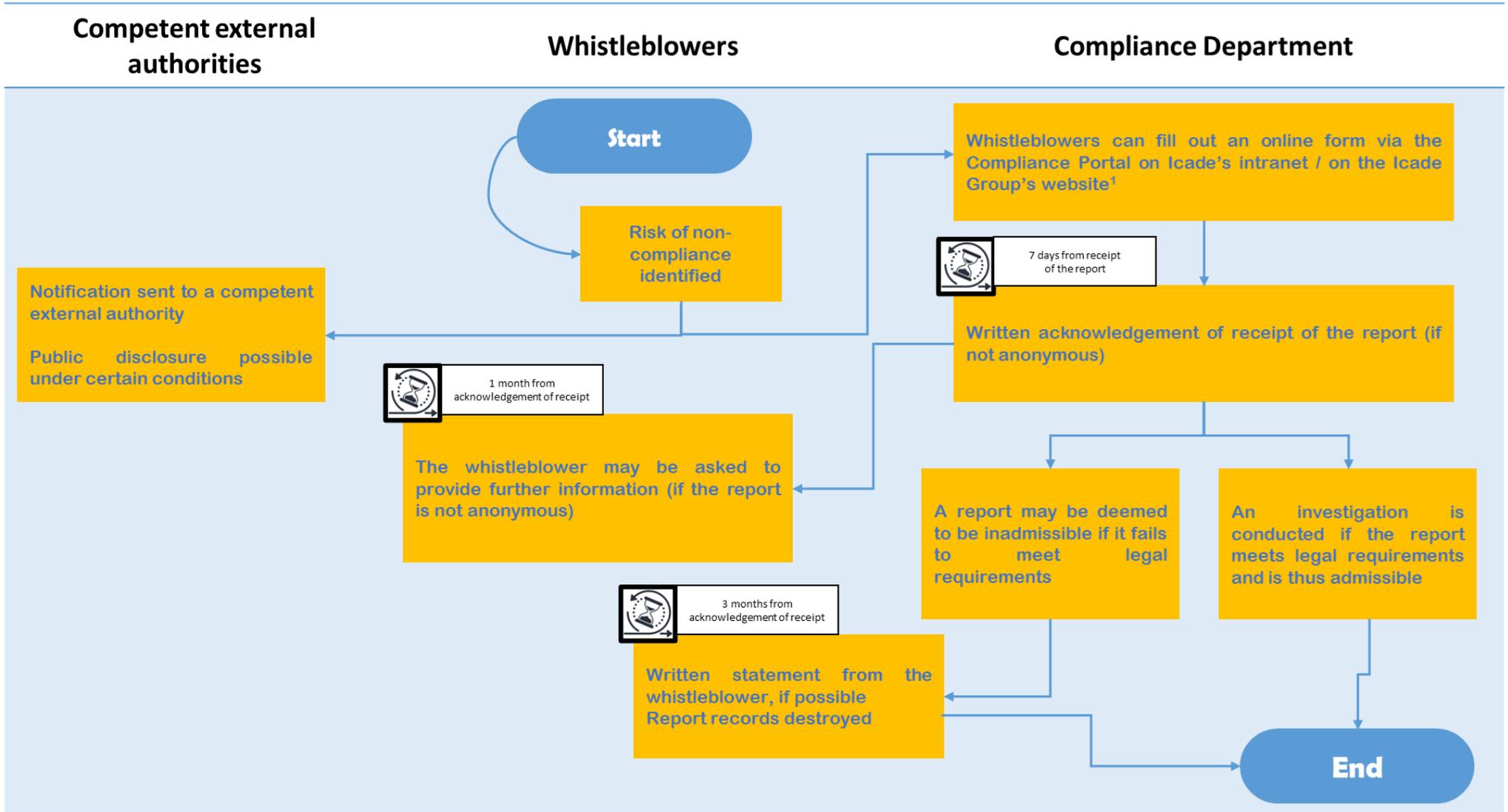
Whistleblowers, **acting in good faith and without direct financial compensation**, may report information, conduct or situations involving serious harm to human rights and fundamental freedoms, the health and safety of individuals and the environment, as well as those likely to be contrary to the Group's legal obligations and/or ethical principles. They may also report facts that **have been brought to their attention in the course of their professional activities**. Whistleblowers are **entitled**, but **not required**, to use the system.



Icade is committed to **supporting and protecting any person** reporting or passing on information **in good faith** on potential or actual violations of regulations and internal policies.



Icade will not tolerate **any form of retaliation** (victimisation, harassment, discrimination, disciplinary measures, etc.) against a person who **reports a violation in good faith**. The perpetrator of such retaliation may face disciplinary action.



¹ Employees have other means at their disposal, including involving line managers, the Head of Human Resources, the harassment officer, employee representatives, etc. However, the whistleblowing system is the only one that ensures confidentiality and protects the whistleblower's identity.

Possible sanctions



Disciplinary action to address non-compliance with Icade's Anti-Bribery and Corruption Policy is provided for in the Employee Handbook and set out in an appendix detailing the penalties provided for under the French Sapin II Law.

→ The Anti-Bribery and Corruption Policy is an integral part of the Employee Handbook and all employees must comply with its rules and procedures.

The belief of acting in the Company's interest can in no way justify behaviour that is contrary to the best practices it sets out.

→ Resulting consequences

A sanction for non-compliance could seriously damage our reputation, image and credibility.

It is incumbent on all to adopt strong anti-corruption practices.

In the event of non-compliance

Disciplinary action proportionate to the non-compliance may be taken against an employee, ranging from a simple warning to dismissal.

→ In addition to disciplinary action, employees may also be subject to criminal and/or civil proceedings.



TO LEARN MORE

Full documentation on countering bribery and corruption is available via the intranet on the Compliance app.

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CONTACTS

Documents relating to ICADE's ethics and compliance policies are available on its website at www.icade.fr/en/ and the intranet.

For information and advice on ethics and compliance, please contact the Compliance Department at the following email addresses:

conformite.ip@icade.fr (for ICADE Promotion & its subsidiaries)

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