



Anti-corruption code

PREAMBLE

PSA is committed to ensuring that its activities adhere to the standards outlined in its [Code of Ethics](#) in compliance with all of the relevant legal provisions.

Corruption in particular is not only illegal, but is in direct contradiction to the ethical values and principles PSA has set out to govern its activities.

As a responsible company, PSA forbids its employees from corrupt activity in any shape or form.

All types of corruption are strictly prohibited: Active or passive corruption, whether direct or indirect, influence peddling, corrupt activity with public or private officials, facilitating payments, favouritism, extortion, collusion with a supplier, customer, or partner, money laundering, misappropriation of funds, gifts or excessive advantages, either given or received, which would affect impartiality towards a supplier, customer, or partner.

While not exhaustive, the present code of conduct aims to clarify the different areas and circumstances in which this principle applies and the appropriate behaviour to prevent any kind of corruption/influence peddling.

The group's employees must understand and strictly comply with these standards in the context of the tasks given to them by the company; a belief that you are acting in the company's interest does not justify any behaviour that contradicts the measures described. Managers must inform their colleagues of the content and issues relating to the code and ensure that the code is observed.

BRIBERY AND CORRUPTION

1. It is forbidden to perform, suggest, or promise cash payments, services or individual gifts or invitations to civil servants or **public officials**. Performing or allowing such payments, services, or gifts through third parties is also forbidden (see ["How to work with intermediaries"](#)).

2. Abstain from performing, suggesting, promising, soliciting, or accepting cash payments, services, and gifts or invitations for or from an external partner (individual or B2B customers, distributors, importers, suppliers, subcontractors, and so on) in exchange for an unfair advantage (for example, winning a contract illegitimately). Offering or accepting such things via a third party is also prohibited.

3. Abstain from accepting or offering cash, gifts, or invitations before/during calls for tenders or any other type of negotiation.

4. Employees must immediately inform their direct superiors, the Anti-corruption Compliance Officer or respective Deputy, or the Group Compliance Office if they find themselves in such a situation.

FACILITATION PAYMENTS

5. Facilitation payments, whether directly made by PSA or indirectly through an intermediary, are a form of corruption. They are therefore forbidden, except in the case of force majeure where someone's life or health is at risk.

GIFTS AND INVITATIONS

Giving and receiving gifts and invitations may be a simple sign of courtesy and part and parcel of a good relationship with partners. However, this can be interpreted or **seen as an act of passive or active corruption**. Any gift or invitations must therefore be reasonable, proportional, and comply with the group's values without an expectation of something in return. Transparency is the golden rule.

6. Employees must refuse to give or accept cash gifts.

7. Employees must refuse gifts or invitations from suppliers, distributors, importers, or partners. Possible exceptions to the rule:

- Lunch, dinner and refreshments justified by the time and duration of meetings or seminars.

- Invitations to seminars or events for professional reasons, including networking. In the latter case, the employee must consult their manager and refuse any request to provide accommodation or transport.

- Gifts or invitations that cannot be refused for obvious cultural or safety reasons. In that case, the employee must inform their manager and [Compliance Coordinator](#), share the gift with their colleagues, or forward the gift to one of the group's departments for donation to charity.

8. Any gifts or invitations received must be declared in accordance with the standards implemented in the departments. The [declaration process](#) must be followed and if in doubt, or in special cases, a contact must be made with the [Compliance Coordinator](#) or Compliance Office.

9. Employees must ensure that any gifts or invitations they give out are appropriate:

- Prior approval of the manager is mandatory whatever the amount.

- The gift should not exceed 150€ or equivalent.

- Ensure and provide evidence that the gift is consistent with the rules and policies of the recipient's entity.

PSA's sponsored events (e.g., dealer events, media events, and marketing or sports events) are consistent with [detailed rules](#).

If in doubt, the employee should contact their [Compliance Coordinator](#) or Compliance Office.

10. In the context of commercial relationships (suppliers, importers, distributors, partners, etc.), the employees must ensure that all parties are aware of PSA's anti-corruption policy regarding gifts and invitations. Similarly, all of the group's employees must be familiar with their partners' policies.

Q: What exactly is corruption?

A: Corruption is a type of "pact" between a person offering an advantage (money, gifts, services, invitations) in exchange for favourable treatment (which would involve violating regulations or professional obligations).

For example, offering a sum of money or an invitation to a prestigious event for signing a contract.

Active corruption consists of offering an advantage.

Passive corruption consists of accepting an advantage.

Favourable treatment can take the form of a contract, commercial relationship, job, or facility.

NB: Even proposing an advantage is already corruption, even if it was never acted upon.

Q: Why does public corruption draw particular attention?

A: Corruption of public officials (elected officials, members of administration or public companies, etc.) is subject to greater fines because it represents misappropriation of public funds. Employees must be particularly vigilant in their interactions with public officials to avoid any behaviour that could constitute or be interpreted as corruption or influence peddling.

Q: What is a facilitating payment?

A: A payment made to a public official to execute or speed up certain administrative formalities such as permit requests, customs clearance for goods, granting visas, administrative licences. Facilitating payments are strictly prohibited.

Q: What are the consequences of committing corruption?

A: Corruption may result in heavy sanctions – huge fines or prison sentences – for the company, management, and the employee(s) involved.

Corruption can, in addition, severely damage a company with damage to the brand's image, commercial sanctions, and particularly exclusion from public contracts and funding.

Q: In Groupe PSA's commercial subsidiary, we have an excellent relationship with the vehicle fleet buyer of a local company. We want to invite him to Roland Garros with his wife. Is this a problem?

A: Yes, invitations to marketing or sport events are exclusively dedicated to people in business relationships with the group without close accompanying people. Note: it is strictly forbidden to invite people working for a public entity. Invitations to sponsored cultural or sport events are the subject of [detailed rules](#).

Q: Can I lend a group vehicle to a representative who supports public incentives?

A: No, a vehicle loan is a marketing tool to extend knowledge of our products, for a test prior to fleet markets or for an increase in visibility. However, vehicle loans should not be considered as offering a personal gift in order to receive an inappropriate advantage. Please refer to the [vehicles loan rules](#).

Q: I am in charge of putting together a very small trade delegation in a country the group is setting up in. The local authorities have requested a small bonus for installing our phone lines. Should I pay?

A: PSA never pays tips or bonuses to local authorities for performing official duties, no matter how small the amount. If the payment requested does not correspond to a legitimate installation fee, you should not pay.

Q: What should I do if someone offers me an expensive gift?

A: Insofar as possible you should politely refuse, citing Groupe PSA's Code of Ethics and Anti-corruption code, and, if required, refer to point 8 in the current code.

Q: What should I do if someone sends me a gift with more than symbolic value in the post?

A: - If it is an expensive gift, return to the sender, thank them, and politely indicate that you cannot accept the gift due to the group's policy ([template](#) of refusal letter). You should then declare the gift to your direct superior and discuss with them, if required, how you could contribute to PSA's decision-making process regarding the sender's company.

- If it is of modest value, thank the person who sent you the gift and indicate for future reference that you cannot accept such gifts again. Share the gift with your colleagues or send it on to another department for donation to charity.

Q: A supplier has privately offered me a one-off 25% discount on obsolete products. Can I accept?

A: You can only accept if the same discount is offered to all of the group's employees.

Q: Can I offer to a B2B customer a gift?

A: You can but this gift must respect the maximum amount authorized by the group and be consistent with the rules of the customer's entity. You must remember that you have to comply with all the rules including your partner's ones. If you don't know the customer's entity rules for gifts and invitations, ask your customer to check the compliance rules of their company.

Q: I have been contacted by the administrative services of the Department for Health, who would like to purchase a specific model from the group for a fleet of ambulances. They want my help to draw up the specifications in the call for tenders. Can I accept?

A: You should never contribute to specifications for public procurement, but you can send on the relevant manufacturer's documentation available.



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CONFLICT OF INTEREST

A conflict of interest exists when an employee's personal interests could be in conflict with PSA's interests. A conflict of interest can create ambiguous relations that could lead to questions about the independence of those involved and the objectivity of decision-making.

11. Potential conflicts of interest must be identified and declared to the manager in order to find the appropriate solution. In case of a conflict of interest situation, or a change of circumstances, or even in case of a doubtful situation, the form "[Conflict of interest declaration and mitigation](#)" must be filled out, signed and kept by the employee and their manager.

12. Employees must refrain from acquiring any form of interest in a commercial entity controlled by PSA's competitors, suppliers, or customers without prior written authorisation from their manager.

13. Unless local legal contradictory disposal, it is forbidden to be engaged in professional activities outside the group without prior written authorisation from Human Resources.

INTERMEDIARIES, AGENTS, AND CONSULTING FIRMS

Calling upon the services of intermediaries offering their services (for payment or otherwise) in order to facilitate or accelerate applications, negotiations, or transactions with public or private bodies can prove useful in the business world. In this case:

14. Consult and apply the "[How to work with intermediaries](#)" document.

15. Confirm in advance that any intermediaries are reputable.

16. Sign written contracts specifying the intermediary's fee/commission and payment methods.

17. Ensure that the services on offer are genuine.

DONATIONS AND SUBSIDIES FOR POLITICAL OR CHARITY CAUSES

18. PSA strictly forbids any donations or subsidies for political purposes and/or political parties.

19. Any organisation within the group that wishes to make a donation for charity or educational purposes must ensure that such a donation or subsidy is legally and ethically sound in relation to the group's Ethics Charter and the rules and practices in force in the country concerned.

RELATIONS WITH PUBLIC INSTITUTIONS

20. The Company supports responsible relations with public institutions by responding to their requests for information. For more details, please refer to the [Groupe PSA's charter for responsible relations with public institutions](#).

SANCTIONS

21. Any breaches of the code may lead, in accordance with the severity or frequency of such a breach, to disciplinary sanctions up to and including dismissal.

WARNING SIGNS

Employees must demonstrate particular vigilance and, if in doubt, flag issues to their manager:

■ **Any unusual payment methods:** requests for bank transfers to a third legal or natural person or to an intermediary country, requests to change payment methods without prior written agreement

■ Any hints of a bad **reputation** associated with the legal or moral person they are interacting with, e.g. mixed up in corruption cases

■ **Any lack of transparency in transactions,** spending, transaction records, requests to cover costs in cash and/or with insufficient documentation, payments without reference to an invoice or order

■ Any request to go through an **intermediary** for no obvious reason or explanation

■ If a company's employee or the public official appears to be acting alone outside their structure/organisation

Q: My child is looking for an internship as part of their studies and one of my subcontractors offers to take him. Can I accept?

A: You must refuse as your supplier has clearly offered you an undue advantage. This may compromise the objectivity of your actions in the commercial relations that you will have with them by influencing your judgment.

Q: What are the most risky situations for conflict of interest?

A: Particular vigilance is required:

- if a family member or close associate has a position of responsibility at a customer company, supplier, subcontractor, or one of PSA's commercial partners or competitors. It is not illegal in itself to have such a relationship, but it could become so if the PSA employee or their close associate acts against the interests of their own employer.

- if a PSA employee, member of their family, or close associate has a close relationship with a public official with supervisory or regulatory authority over PSA and if this relationship could be exploited to obtain some form of favour or facility.

Q: In the context of the transfer abroad of regional commercial department offices, I use the services of a local consultant to help me obtain the required administrative permits. I gave them a significant advance they can use to speed up the process. Is this compliant?

A: You should never give advance payments to intermediaries before you've made sure they are not going to make any illicit payments and that the services offered are genuine.

Q: An intermediary offers to help me on a specific matter by using their influence. I think their actions are not in accordance with the rules, but it is their responsibility.

A: PSA is responsible for all of the actions of its intermediaries. You have to refuse and to check that all actions engaged by your intermediaries are compliant with the rules. You should also check that your intermediaries comply with our expectations. You have to follow the Group's [due diligence process](#).

Q: In order to conclude a contract, I have been asked to give advance permission for a donation to a charitable organisation in the company's name. Is this allowed?

A: No, you should not take part in such practices. Donations are not allowed if the goal is to influence a decision made by a public authority or action by the civil service.

In case of doubts or if you suspect that a transaction might involve corrupt payments, immediately report this to the [Compliance coordinator](#) or Compliance Office, your direct superior or via the [Speak4Compliance](#) tool. The whistleblowing system offers strong protection and confidentiality for those using it.

Reference documents, required details, managers, links to training to be undertaken, etc., can all be found on [Live'In](#).

Employees must demonstrate particular vigilance and, if in doubt, talk to their manager if any employee at a company or a public official:

■ Offers an advantage or requests a cash gift or gift in kind in order to perform a service

■ Provides **forged invoices or other documentation**

■ Refuses to provide written proof that they respect the legal anti-corruption provisions

■ Suggests **cash payment** in order to win a procurement contract

■ Requests a side letter to set down remuneration and payment methods, refusing to include such information in contracts and other documentation officially agreed between the parties

■ Requests **commission/fees/compensation greater** than the going market rate with no objective justification

■ Requests a **job for a friend/family member** outside the company's official recruitment process

■ Requests a donation to a **charity** in exchange for concluding a contract