



All committed against corruption

1. Carrefour's commitment

Carrefour is committed to **developing a culture of trust and integrity throughout the Group and with its stakeholders.**

Our Principles of Ethics define the terms of reference on the basis of which each collaborator is required to perform his or her duties on a daily basis.

Carrefour refuses any form of corruption, and complies with all **applicable anti-corruption laws.**

Our principles of action and behavior are in line with the **Carrefour Group's commitments for the observance and promotion of fundamental principles**, including the OECD Guidelines and the ten principles of the UNO's Global Compact.

Carrefour is committed to **enabling its collaborators to report any breach of the law on a fully confidential basis.**

Carrefour has formalized a ***Policy against corruption and influence-peddling***, applicable to all **Carrefour Group's employees**, wherever the country, **and to all companies and individuals acting for the Group.**

2. What are the issues?

Corruption consists of promising or offering (*active corruption*) or requesting, accepting or receiving (*passive corruption*), directly or indirectly, for oneself or for others, improper benefits (*offers, promises, donations, gifts, etc.*) from or for anyone (*public official or private party*) in order to perform, to abstain from, or to delay an act within the purview of (*or an act facilitated by*) that party's position, duties or office, or in breach of his or her duties or obligations.

Corruption can take several forms: bribes, gifts, hospitality, favouritism etc.

Corruption is a criminal offense, incurring severe penalties in most countries in the world, on the basis of domestic legislation, international treaties, and long-arm statutes such as the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA), and the French Criminal Code.

The French "**Sapin 2**" Act passed on 9 December 2016 has substantially reinforced the French anti-corruption schemes. It requires major businesses to establish corruption-prevention actions and has created a French Anti-Corruption Agency, in charge of reviewing their effective implementation and provided with punitive powers.

The identification of red flags assists in the avoidance of dubious situations but above all in taking appropriate action before becoming involved in a corruption scenario.

3. Principles

Everyone must **abstain from any corruption or influence-peddling**.

No personal benefit of any kind whatsoever may be obtained from relations with suppliers or service providers.

Carrefour wishes to restrict the number and cost of gifts and hospitality provided or received by its collaborators.

Any gift or hospitality, received or offered, must be of an **occasional and reasonable nature**, with a **strictly professional purpose** of promoting Carrefour's operations, with a **possibility of reciprocity** and in **compliance with the applicable legislation**.

The use of an intermediary may be contemplated only if there is a **genuine need** for the services provided, **substantiated** and formalized in a **contract reviewed by the Legal Department**, with clear-cut **objectives**, and for an **assignment fully defined and limited** in terms of purpose, location and duration.

No benefit of any kind whatsoever may be offered or granted to **any person exercising public authority** with a view to influencing him or her in order to obtain a favorable decision.

"Facilitating" payments that might secure or expedite routine governmental legal actions (*permits, licenses, visas, customs clearance, etc.*) **shall be strictly prohibited, even if their value is low.**

4. Principles shared with third parties with whom Carrefour is in relation

Carrefour expects from third parties with whom the Group is in relation that they establish a prevention framework to control the main corruption risks considering the specificities of their business line and their countries.

They should also **inform and train** all their employees exposed to those risks.

Everyone is invited to report any practice or action that he regards as inconsistent or incompatible with any of the stated principles by contacting the **Group's ethics reporting line**:

ethics.carrefour.com