

Anti corruption, anti bribery and anti trust

Corruption, bribery and attempted bribery are unacceptable. This applies whether offering a bribe, or accepting a bribe. It is against our values of conducting business to the highest legal, moral and ethical standards.

Bribery and corruption are covered by various international laws and statutes. These laws often require companies to have rigorous, pro-active measures to detect and prevent corrupt practices.

The laws that apply to particular international business activities include those of the countries in which the activities occur as well as others that govern the international operations of national companies and citizens in respect of their conduct both at home and abroad.

We have to ensure that we are aware of, and are complying with, applicable laws.

As a demonstration of its commitment, we pledge to take a zero-tolerance approach to bribery and corruption. At all times, we will act professionally, fairly and with the utmost integrity in all business dealings and relationships. This will apply wherever they operate.

By agreeing and committing to this document, you will undertake to:

- Never engage in any form of bribery, either directly or through any third party.
- Never offer or make an improper payment, or authorise an improper payment to any individual, including any local or foreign official anywhere in the world.
- Never attempt to induce an individual, or a local or foreign official to act illegally or improperly.
- Never offer or accept money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract.
- Never offer or give any gift or token of hospitality to any public employee or government official or representative if there is any expectation or implication for a return favour.
- Never accept any gift from any business partner if there is any suggestion that a return favour will be expected or implied.
- Never facilitate payments to obtain a level of service which one would not normally be entitled to.
- Never disregard or fail to report any indication or improper payments to the appropriate authorities.
- Never induce or assist another individual to break any applicable law or regulation.

All our suppliers commit to legal and ethical behaviour, and to refrain from engaging in any business that will harm the interests of Atlas, partners or clients.

Atlas' suppliers will ensure that they are aware of all applicable laws and regulations covering anticompetitive practices in all the jurisdictions in which they operate, and that they will obey and uphold those laws and regulations.

Atlas' suppliers will ensure that they are aware of, and are complying with, applicable laws and regulations in connection with cartels.

As a demonstration of its commitment, Atlas and its suppliers pledge to take a zero-tolerance approach to cartel conduct. At all times, Atlas and its suppliers will act professionally, fairly and with the utmost integrity in all business dealings and relationships. This will apply wherever they operate.

By agreeing and committing to this document, you as a supplier, undertake to:

- Never make direct or indirect contact with an actual or potential competitor or other third party, the object of which is to engage in cartel behaviour.
- Never propose or reach an agreement, whether directly or indirectly, formally or informally, with actual or potential competitors, regarding any sensitive competition-related issues, including:
 - Fixing prices
 - Dividing or sharing markets, customers or territories
 - Rigging a competitive bidding process
- Report any indication or initiative of improper anticompetitive business conduct by an actual or potential competitor in accordance to your internal reporting procedure, including but not limited to, reporting to your legal department and / or to the relevant Anti-Trust authorities.
- Not to participate in a meeting of a trade association in which sensitive competition-related issues are discussed. If such subjects are raised during a meeting, employees must immediately ask for the discussion to end. If not, they must leave the meeting and ask for that to be noted in the minutes of the meeting.
- Ensure that all internal and external correspondence, including e-mails and texts, and documents, discussions and public statements do not contain any statements that might be misinterpreted by third parties or Anti-Trust authorities and courts in the context of a potential Anti-Trust investigation.
- Maintain independent judgement in pricing or selling of any products and / or services.
- Limit any information discussed during commercial negotiations, with or disclosed to competitors or other third parties, to that which is strictly necessary for completing or assessing the transaction.

