

# Air France – KLM Group anti-corruption Code of conduct

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Air France-KLM



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President and Chief  
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# 1. PREFACE BY TOP MANAGEMENT

At the forefront of a more responsible European aviation, we unite people for the world of tomorrow as stated in the Air France KLM Corporate purpose.

As part of our vision of responsible and sustainable business, we concentrate on prevention of corruption because we consider that it helps in unlocking progress for societies, decreasing poverty and inequality and strengthening political stability.

Therefore, the Air France-KLM Group is committed to conducting business with loyalty, fairness, transparency, honesty and integrity and in the strict respect of the anti-corruption laws in all the countries where its entities are registered and operate.

For that purpose, the Air France-KLM Group is engaged in preventing any unlawful behaviour, notably concerning bribery and influence peddling that could have detrimental financial and operational consequences and damage its reputation towards the business partners, communities, and ultimately customers.

While it has already been part of our intrinsic motivation and our priority for years as Top Management to ensure that we reach that goal, the implementation of more and more complex and stringent regulations, the greater business integrity expected by stakeholders trigger the need to strengthen our compliance program, update and improve our Anti-corruption Code of Conduct with associated training and continue to communicate on our zero tolerance policy on corruption practices.

Combatting bribery and influence peddling is a fundamental element of our culture of integrity and compliance of our Group as stated in our Air France-KLM Policy. Even when facing difficult times such as economic or sanitary crisis or geopolitical conflicts, which adversely impact our whole business sector, we

will not compromise on our ethical values and commitments in terms of prohibition of corruption.

In addition, irrespective of the sanctions mentioned above for non-compliance with applicable regulations, we also consider that these legal obligations give us an opportunity to continue to spread and promote our values and ethical culture among the whole organization and with our business partners.

This updated version of the Air France-KLM Group anti-corruption Code of Conduct (“Anti-corruption Code of Conduct”) is part of the anti-corruption program implemented to take into account recognized international standards and regulatory requirements such as the FCPA in the US, the UK Bribery Act, or the French Sapin II Law.

This Anti-corruption Code of Conduct, together with its six Policies attached as appendixes, set out the rules that must be complied with by all employees and directors of the entities of the Air France-KLM Group as well as by any third parties with whom we do business. They reflect the values of respect, trust, transparency and confidentiality stated in the Air France-KLM Principles.

Each and every director, officer, staff member and any third party acting on behalf of an entity of the Air France-KLM Group is responsible for understanding the rules and principles set out in this Anti-corruption Code of Conduct and its Policies and for complying fully with them as well as with all applicable anti-corruption laws wherever we do business.

This Anti-corruption Code of Conduct and the Policies provide for all definitions of offences, examples of prohibited behaviors and associated sanctions, recommendations to follow to avoid corruption risks based notably on our risk mapping and reported dilemmas; as well as useful contacts and reporting mechanisms to ensure that all deviations can be avoided and remedied.

We need everyone to make Compliance a top priority and we thank you for your involvement and commitment.

Benjamin Smith

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Anne Rigail

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President and Chief Executive Officer, KLM

## 2. PURPOSE AND SCOPE

### 2.1. Purpose

The purpose of this Anti-corruption Code of Conduct is to:

- (i) provide guidance on how to identify the practices and situations, which could constitute corruption offences in order to mitigate the risks of committing any such offences;
- (ii) define the right behaviours to be adopted to avoid corruption risks;
- (iii) characterize the prohibited practices and set forth the associated sanctions in case of violation of the rules and principles stated in this Anti-corruption Code of Conduct or any of its related Policies attached to it as an appendix;
- (iv) provide contact details of compliance teams and information on reporting mechanisms which may be used to report on any violation of this Anti-corruption Code of Conduct and its Policies.

This Anti-corruption Code of Conduct provides for practical examples, which for some of them, are derived from the performance of the corruption risk mapping or reported dilemmas or discussions during training sessions.

It will enable employees to clearly understand the risks, which relate to or may be generated from their activities within the Air France-KLM Group.

This Anti-corruption Code of Conduct also includes the appendixes attached to it (i.e. the “Policies”).

These Policies set forth the specific rules and procedures to follow for each of the topics to be addressed as part of the anti-corruption program.



Each of these Policies complements the general principles and examples mentioned to the corresponding topics in articles 5 to 11 of this Anti-corruption Code of Conduct so that the employees, who are more concerned by these topics can refer to them.

The objective is to facilitate the understanding of the general principles applicable to everyone and deal with the specificities of some situations that may be applicable to fewer functions or positions but with higher risk exposure.

## 2.2. Scope

This Anti-corruption Code of Conduct and the Policies apply to all staff members and directors of (an entity of) the Air France-KLM Group and to their agents, consultants, distributors, suppliers or others acting on behalf of the Air France-KLM Group or with which it does business, including operations conducted by or with (joint-venture) partners.

The Anti-corruption Code of Conduct is incorporated into the internal rules of procedure (such as “Règlement Intérieur” for French companies) in companies of the Air France-KLM Group where such rules are compulsory per local laws.

This Anti-corruption Code of Conduct sets out the minimum rules to observe everywhere the Air France-KLM Group operates. It may be complemented as follows:

- In some situations, the Air France-KLM Group may have adopted more specific policies in relation to specific areas (e.g. data policy, competition law...). These specific rules must be followed in addition to the ones stated in the Anti-corruption Code of Conduct and the Policies which addressed the topics from an anti-corruption standpoint only;

- the Air France-KLM Group entities may have adopted additional policies in certain areas setting out stricter rules than the minimum rules defined herein;
- In some countries local laws and regulations may be stricter or more detailed than the principles set out in this Anti-corruption Code of Conduct.

In the above cases, the stricter and/or more detailed rules and policies shall apply. In case of doubt, please refer to your manager and/or contact your compliance coordinators or compliance officer.

## **3. COMMITMENTS FOR TOP MANAGEMENT AND EMPLOYEES**

### 3.1. Top Management commitments and obligations

According to certain regulations dedicated to the fight against corruption, the Top Management of companies subject to such regulations have specific responsibilities to reach the objectives stated by these regulations.

For clarification purpose, Top Management includes the persons at the head of the legal entities who are responsible for the management of such entities in accordance with corporate laws and the by-laws of such entities.

The Top Management is responsible for ensuring that the Air France-KLM Group implements an effective and efficient anti-corruption program within the whole organization.

For that purpose, they commit to provide the necessary means and resources to (i) detect and prevent corruption offences through awareness campaigns and training for employees, risk assessment projects and reporting mechanisms and (ii) to fight against corruption by ensuring required internal

investigations are conducted whenever necessary and sanctions are applied in case of violation of this Anti-corruption Code of Conduct or its Policies.

In particular, they entrust the compliance officers or legal directors as the case may be with the authority and resources required to enable them to ensure the effective implementation of the compliance program. The compliance officers and legal directors as the case may be have access to the management bodies in order to alert them or request new measures necessary to the effectiveness of the compliance program.

The Top Management commits to strictly abiding by the rules of this Anti-Corruption Code of Conduct and its Policies. They must show exemplary behaviors by act and conduct and will communicate on the Air France-KLM Group's rules and standards on anti-corruption matters to spread the ethical culture as much as possible internally and externally.

## 3.2. Employees' obligations

As staff members of the Air France-KLM Group, you must have knowledge of and fully comply with this Anti-corruption Code of Conduct and its Policies. If applicable to your activities, you must follow the internal procedures which are referred to in this Anti-corruption Code of Conduct and its Policies and which complement the anti-corruption program.

The staff members who are managers or supervise others have an additional responsibility. They must lead by example and ensure that their staff have received the necessary information and training to respect this Anti-corruption Code of Conduct.

From time to time, there may be questions in actual practice that could not be anticipated by this Anti-corruption Code of Conduct or for which you face uncertainty.

If you are uncertain about how to act under certain circumstances, you need to seek advice from your manager, your compliance officer or compliance coordinator, whose contact details are given at the end of this Anti-corruption Code of Conduct and available on the Intranet.

If you believe that an applicable written local law conflicts with the guidelines in this Anti-corruption Code of Conduct or Policies, you must contact the above-mentioned persons before taking any other action.

Even if local laws do not prohibit a specific behavior or if a local custom, practice or tradition conflicts with this Anti-corruption Code of Conduct or its Policies, you must comply with this Anti-corruption Code of Conduct and its Policies.



**Claiming that the offering of a gift or making a payment or adopting a certain conduct is a common practice in a given country, or that you were unaware that a transaction is in contradiction with the rules of this Anti-corruption Code of Conduct and its Policies, will not be an acceptable line of defense in case of a control by authorities or anti-corruption agencies or legal actions by third parties which suffered from such actions.**

You may report violations of this Anti-corruption Code of Conduct, its Policies and / or other internal rules of your company and other issues via reporting procedures, including whistleblowing mechanism (see below in article 12).

## **4. RISKS AND SANCTIONS**

In several local and foreign regulations on anti-corruption applicable to our organization, **both companies and individuals can be convicted of a criminal offence for corruption.**

The sanctions may consist of significant fines, damages, prohibition to participate to future public tenders, inability to obtain or renew export licenses, imprisonment for legal representatives and/or the individual employee who committed the corruption offence, damage to reputation towards our customers, partners, shareholders, investors...

In addition to the sanctions applied by national authorities, the individuals and companies involved in prohibited activities can face legal actions and be held liable to compensate other third parties (individuals or companies) who may have suffered losses as a result of a prohibited act.

The future of the Air France-KLM Group depends on the confidence it inspires to its customers, employees, shareholders and private or public partners. This is one of the reasons why the Air France-KLM Group strictly prohibits all conduct and acts violating the applicable anti-corruption laws wherever it operates. These prohibitions therefore apply even if a particular type of conduct referred to in this Anti-corruption Code of Conduct and its Policies is not sanctioned by the local legislation in force in a particular country.

Pursuant to our zero-tolerance policy for corruption, any violation of this Anti-corruption Code of Conduct and its Policies may lead to criminal, civil and/or disciplinary sanctions, including as the case may be termination of employment by the relevant employer from the Air France-KLM Group in accordance with the applicable laws and rules of such company. Please refer to the internal rules of your company if applicable (i.e. "Réglement Intérieur" for entities registered in France).

## **5. PROHIBITION OF BRIBERY AND INFLUENCE PEDDLING**

Corruption can occur through bribery and influence peddling practices.

Such practices are fundamentally opposed to the values of the Air France-KLM Group and are strictly prohibited by most countries in the world.

Therefore, it is strictly prohibited to:

- **directly or indirectly** (through an intermediary) offer, promise or give an undue Advantage to someone, whether a Public Agent or a private person or entity (i.e supplier, customer or any business partner) to :
  1. persuade or reward them to act against their legal obligations (=> active bribery offence), or
  2. persuade or reward them to use their influence towards another party to help in obtaining or retaining business or to direct business to anyone or to obtain any other advantage (=> active influence peddling offence) or
- **directly or indirectly** (through an intermediary) request or accept to receive an undue Advantage to persuade you to or reward you for
  1. acting against your legal, contractual and professional obligations (=> passive bribery offence), or
  2. using your influence towards another party in order to help in obtaining or retaining business or to direct business to anyone or to obtain any other advantage (=> passive influence peddling offence).

For clarification purpose, a “Public Agent” means any individual, company, organization, as the case may be, in a position of public authority, entrusted with a public service mission, or chosen by the electorate to represent public interests, or holding or being candidate for a public office or performing public administration.

For example, Public Officials include but are not limited to:

- any officials or agents of a public international organization (e.g. the United Nations, the World Bank, the European Commission, etc.),
- any person employed by a Government,
- any entity hired to review invitations to tender on behalf of a public agency,
- customs officers,
- State owned companies.

An “Advantage” includes without limitation any advantage such as money, goods, services, favors, discounts, gifts, tickets, entertainment events, hospitality, such as dinners and accommodation. It basically covers any financial or other advantage which may be of an interest to the recipient.

The offenses of bribery and influence peddling are constituted even if:

- No undue Advantage or no payment have been granted following a promise or an offer (=> a “mere attempt” is enough to be liable for the corruption offence),
- there is no formal written agreement by the other party (=> oral acceptance or acceptance by conduct is enough),
- it is an intermediary who carries out the act of corruption,
- the promise or the offer was made without intent to violate the law,
- The proposed Advantage is not financial or the value seems low for the person who offers the Advantage (i.e. such as services or personal favor),
- the bribery practice is between private companies (=> it does not only apply to Public Agents).



**The Air France-KLM Group strongly prohibits bribery and influence peddling in all their forms and offers clear guidance and rules to help you to identify situations at risk and adopt a conduct in accordance with rules or standards on all occasions.**

**Question:** After a meeting to discuss some items in a contract with your IT supplier where no business decisions are at stake, the supplier invites you to lunch in its company's restaurant. Can you accept the invitation?



**Answer:** Yes, it is a usual business situation and a modest expense for a meal at the cafeteria, not an attempt to bribe you to change your position on the contract terms. Timing for "decision making process" is critical: please remain careful when invitations – even modest ones - are made when you discuss performance of a contract, payment issues, disputes in interpretation of some terms or obligations in the contract for instance. In such cases, invitations may be construed as an attempt to soften your position in the discussions with this supplier.



For more information on gifts and hospitality, see the Gift and Hospitality section below and the appendix on this topic attached to this Anti-corruption Code of Conduct.



**Question:** You are negotiating an aircraft maintenance business with a customer. The customer informs you that it is willing to select you for this business **only** if you agree to provide business class airlines tickets to some of its employees each year so that such employees can go on vacation. Can you accept such request?



**Answer:** No, the customer is clearly attempting to obtain undue Advantage from you in a tender process situation, which constitutes passive bribery.



**Question:** you want an entity of the Air France-KLM Group to be selected for a cargo business with a partner, but your partner informs you that your offer is not the best one. A consultant approaches you and claims that if you select him/her to assist you in this negotiation, he/she will help you win this contract since he/she knows very well the CEO of your (future) cargo partner. Can you accept this offer?

**Answer:** No, the consultant is acting as an intermediary who will use his/her influence with the partner to get a business that you would not have obtained on the sole merits of your offer.

## 6. PRINCIPLES ON GIFTS AND HOSPITALITY

Gifts and hospitality (such as presents, meals, travel, entertainment events as defined in the Policy on Gifts and Hospitality attached to this Anti-corruption Code of Conduct) are often viewed as ways to show politeness towards business partners.

Although such practice is not unlawful, gifts and hospitality are also one of the most common forms of corruption, as they may constitute the “undue” Advantage referred to in the offence of bribery and influence peddling defined in Article 5 above.

Therefore, you must be careful when offering or receiving gifts or invitations and ensure that they are in line with the principles stated in the Gift and

Hospitality Policy attached to this Anti-corruption Code of Conduct and report them to your manager.

As a summary of such principles:

- You shall never accept or request an advantage in exchange for a favorable treatment or that might create a sense of obligation for the recipient; Gifts and hospitality must always occur **for legitimate business reasons**;
- You may only accept or offer **reasonable and proportionate gifts and / or hospitality in a transparent manner and in line with frequency and threshold value** mentioned in the Policy; Gifts above 50 euros (or equivalent) and hospitality above 100 euros per person and per event (or equivalent) are exceptional and subject to a specific reporting and approval mechanism. The same rules apply for Public Officials;
- Political charitable donations and political contributions are prohibited;
- You shall check the value of the gift and hospitality to apply the relevant **reporting and approval mechanism** stated in the Gift and Hospitality Policy and **keep records and supporting documentation**;
- In case of doubt, decline or refrain from offering the gift or hospitality and / or contact your compliance officer. You can also use the self-assessment stated in the Air France-KLM Principles to assess the situation in addition to the rules stated in the Gifts and Hospitalities policy.



**Question:** During contractual negotiations with a customer, you have invited the procurement manager to visit your offices. The procurement manager has asked you whether he/she can bring his/her spouse. Are you allowed to arrange for travel and entertainment for the customer's spouse?

**Answer:** No. the visit of the spouse is not linked to legitimate business reasons.



**Question:** a supplier of aircraft spare parts offers you and your spouse a dinner in a luxurious restaurant after renewing a five-year-contract. The supplier will not attend the dinner. Can you accept such invitation to celebrate the extension of your commercial relationship with this supplier?

**Answer:** No. A dinner in a luxurious restaurant offered by a business relation without a legitimate business purpose and without the supplier attending it is considered inappropriate and unreasonable. You should politely decline the offer.



**Question:** After signing a major contract for IT services, are you allowed to send to your business partner's team a bottle of champagne and a fruit basket to the attention of the team who negotiated the contract?

**Answer:** Yes, but only after confirmation from your manager based on the value. This is an acceptable gift, addressed after negotiations and to the team involved in the project at their office in a transparent matter



For more examples and details, please refer to the Gift and Hospitality Policy.

## 7. PRINCIPLES ON CONFLICTS OF INTERESTS

Conflicts of interest may be defined as a situation where your private interests are against or may appear to oppose the interests of the Air France-KLM Group and therefore impact the impartial and objective exercise of your functions.

For example, a conflict of interest could arise

- from your **direct involvement** if you have a mandate in a company which is a competitor or customer or supplier of the Air France-KLM Group entity for which you are working;
- **indirectly** if one of your relatives (family / friend) is working for a business partner of an Air France-KLM Group entity with which you are in charge of setting or maintaining business relationships.

When finding yourself in this situation whether **real or potential**, you must report it without delay to your manager or HR manager to discuss the matter and resolve the situation in accordance with the rules stated in the Policy on Conflict of interests attached as an Appendix to this Anti-corruption Code of Conduct.

Although a conflict of interests situation is not unlawful, the impact it may have can create detrimental consequences to the Air France-KLM Group and can sometimes lead to corruption offences, notably through influence peddling.

**Question:** You are in charge of selecting a service provider to assist your company with custom clearance activities. Your brother works for a company that you consider can properly carry out this activity with necessary skills and experience. Can you decide to select this company?



**Answer:** This personal connection with a service provider could appear to influence your decision and incur the risk of the contract being awarded on unfair terms. All conflicts of interest, real or potential, must be reported to your manager or HR manager or to any other person in observance of the internal policies applicable within your company. Depending on the circumstances and the applicable procedure, your manager may decide to appoint another person to manage the situation on your behalf.

**Question:** You are a human resources manager and you are allowed to decide on the recruitment of your staff. One of your relatives is seeking employment. Can you offer him the job without any selection process with other candidates?



**Answer:** You are not allowed to do that. The recruitment of a relative is not forbidden, but similar conditions for selection and by a competitive approach should apply as for any other candidate. You should have your relative participate with other candidates in the selection process for the job.

**Question:** One of your friends has set up a start up specialized in aircraft parts inventory management. Your friend offers to conclude a free of charge proof of concept (POC) for a few months which may then lead to a long-term contract with the Air France-KLM Group if the solution is suitable. Do you need to report your connection with this entity at the POC stage?



**Answer:** Yes, this information must be reported so that measures can be taken for the management of the relationship with this start up and the potential future contract.



For more information, see the Policy on conflicts of interests attached as the Appendix relating to this topic.

## 8. PRINCIPLES ON FACILITATION PAYMENTS

Facilitation payments are unofficial small payments made to secure or speed up routine governmental administrative formalities or business transactions that should normally be obtained through normal legal channels. They can occur in the following situations: issuance of permits, immigration controls, loading and unloading of cargo and releasing goods held in customs.

Most countries prohibit making or requesting these payments under anti-corruption laws.

Therefore, acceptance or offer to make facilitation payments are strictly prohibited, regardless of the country where you are doing business. Facilitation payments are considered bribes since they consist of giving unofficial money or goods to perform a duty, or refrain from performing a duty, or to perform a duty improperly.

The prohibition of facilitation payments extends to all our business transactions. Therefore, you must ensure that anyone you are engaged with (i.e. supplier, intermediary) does not make facilitation payments on your behalf.

In exceptional cases, where verbal and psychological pressure is accompanied by an explicit threat to your life or freedom (i.e. threat to be sent to jail), you

are exceptionally authorized to make the payment, but you must report the incident to your manager and compliance officer when in safety, to allow Air France-KLM Group to file appropriate complaint.

From a general perspective, special care must be taken in relationships with public officials, with regard to persons who are known or suspected to be family members of public officials or companies who are controlled by family members of public officials.

Anti-corruption laws and Air France-KLM Group expressly forbid the direct or indirect offer or promise of a financial payment or any other advantage to a public official for the purpose of:

- influencing any act or decision;
- persuading the public official to act against his/her legal obligations;
- obtaining an improper advantage from the public official;
- persuading such a person to use his/her influence with a governmental agency, in order to assist in obtaining or retaining business or to direct business to anyone. The mention of 'obtaining or retaining business' must be understood in its widest sense including business advantages such as obtaining a permit or a tax break (a lower tax rate allowed by government).

Should you be requested to offer something by a public official, report the incident immediately to your manager, compliance officer or compliance coordinator.



**Question:** A public official asks you to invite him and his wife to a business conference abroad in exchange for securing an operating license in a given country. Is it acceptable?

**Answer:** You cannot accept to extend the advantage that would constitute a bribe and could lead to disciplinary and / or criminal

sanctions. You must firmly refuse to give the requested advantage and should report the incident to your manager as soon as possible.



**Question:** The customs office in a foreign country has contacted you to inform you that a cargo delivery with desperately needed aircraft parts has been held up in customs. The aircraft will be grounded pending the release of the aircraft parts. Even though the paperwork is in order, the customs officer has informed you that government regulations require that the shipment stay in the customs warehouse for at least another two weeks. He says that if you agree to pay USD 100 in cash, he will immediately release the items. Should you pay ?

**Answer:** No. The customs officer is offering you a special treatment in exchange for money. Such payment is a facilitation payment, considered a bribe and is prohibited. Firmly refuse to make the payment and report to management.



For more information, see the Policy on facilitation payments attached as the appendix relating to this topic.

## 9. PRINCIPLES ON PATRONAGE AND SPONSORSHIP

Patronage may be defined as providing support to a project, person or individual who performs public interest activities, without receiving anything in return from the beneficiary.



Sponsoring may be defined as providing support to a project, person or individual in exchange of a benefit from such action (in terms of marketing or publicity for instance).

Local laws set up specific regulations and prohibitions relating to certain forms of donations, patronage and sponsoring. Considering the diverse legal frameworks and the compliance risks such actions may involve, the Air France-KLM Group prohibits **any political charitable donations or political contributions**.

The other types of Patronage or sponsorship may only be done in accordance with the procedure set up in the Policy on Patronage and Sponsorship attached as appendix to this Anti-corruption Code of Conduct since the advantage granted in the course of patronage or sponsoring can be used to obtain something else unduly from your business partner (for instance a customer accepting to select you for a business for the sole reason that you have accepted to provide money to a charitable or sponsored event).



For more information, see the Policy on Patronage and Sponsorship attached as the appendix relating to this topic.

## 10. PRINCIPLES ON LOBBYING

Lobbying may be defined as an activity aimed at influencing public decision-making.

It may relate to the content of a law or regulation and establishing contacts with various public officials, administrative authorities, members of the Government or a cabinet office, or members of Parliament.

Therefore, it may sometimes lead to the risk of influence peddling situations which are strictly prohibited.

Certain local laws set forth specific obligations and prohibitions relating to lobbying activities.

Such obligations may, for instance, involve declaratory obligations for the Air France-KLM Group entities under the applicable laws and you may occasionally be requested to provide information about relevant activities so as to allow the concerned the Air France-KLM Group entities to meet their legal obligations.

You must consult your manager or compliance officer or the relevant department in charge of lobbying in your organization if in doubt as to whether your activity may qualify as lobbying and consult any applicable local rules and policies relating to such activities.



Lobbying may only be done in accordance with the procedure set up in the Policy on Lobbying attached as appendix to this Anti-corruption Code of Conduct.

## **11. PRINCIPLES ON RELATIONS WITH THIRD PARTIES**

An entity of the Air France–KLM Group can be held accountable for the actions of third parties such as suppliers, (joint venture) partners, affiliates, agents, consultants, distributors or other representatives.

All third parties who act on behalf of the Air France-KLM Group are required to comply with anti-corruption laws at all times.

The following non-limitative measures must apply to reduce any compliance risk:

- perform due diligence in order to check that the contemplated contractual relation does not raise compliance risks;
- ask the third party about its own anti-corruption policies and inform the third party of our commitment to comply with all anti-corruption laws and of our related policies and that they also apply to our contracting partners;
- clearly define the nature of the third party's services to be provided, and associated costs and remuneration which shall be adequate to the performance of such services, not the benefit expected from them;
- define the remuneration of the third party on the most objective elements possible;
- perform regular review or audit to check that the third party comply with the requirements stated in this list;
- include contractual terms requiring the third party not to offer bribes, allowing for audits, requiring the third party to report any requests for bribes and giving the Air France-KLM Group the right to audit compliance and terminate the contract if the third party's actions are suspicious.
- proceed to a third-party assessment by an independent auditor for high risks third parties before entering in the relationship and during the term of the relationship;
- refer to the third parties evaluation procedures made by your compliance officers.

The Air France-KLM Group entities participate in various bids as a candidate for providing goods and / or services to public or private parties. It is essential that bid procedures and contract awards are made in compliance with all

applicable laws and rules. It is important to proceed with caution in our contacts with any related individuals and entities to ensure total transparency concerning the exchanges or interactions we have with such parties.

Local procurement decisions awarding contracts to Air France-KLM Group must be made on merit and not by exerting improper influence on others. The selection of a supplier or sub-contractor of goods or services must be based on exclusively objective criteria and transparency. Procurement regulations usually include specific rules about the timing of, and process for, securing bid information and documents and you should ensure that you act in conformance with those rules. You should never seek non-public confidential information in opposition to such regulations.

During a public tender process, strict regulations usually exist concerning the bid process, including possible conflicts of interest and interactions and communications with officials involved in the tender process.



If you have relationships with third parties while performing your activity, please refer to the rules stated in the Policy on Third Parties attached as appendix to this Anti-corruption Code of Conduct and applicable specific rules applicable to your domain activity or entity.

## 12. REPORTING MECHANISM

The entities of the Air France-KLM Group have set out reporting procedures, including whistleblowing policies, that notably allow staff to report, situations or behaviors that they consider contrary to this Anti-corruption Code of Conduct and its Policies, as well as a number of other compliance dilemmas.

Management of reported incidents will help the Air France – KLM Group in (i) adopting corrective measures, (ii) improving procedures or tools, (iii) adapting

the communication and training materials based on these real-life scenarios and (iv) ensuring that we maintain our operational performance and respecting our values. We will always promote and encourage this “speak culture” within our organizations. This is why we urge you to report any issue or incident to enable the Air France-KLM Group to remedy any issue, which is not in line with its standards and applicable regulations.

The reporting mechanisms, which are implemented in the Air France – KLM Group, are secured and access rights are restricted to those staff members authorized and trained to receive and process the incident reports to ensure independent analysis, strict confidentiality and no retaliation measures can apply to the whistleblower in accordance with our values and applicable laws.



For further information, please refer to the applicable reporting procedures, including Whistleblowing policies, available via intranet of your entity.

## **13. WHAT IF I HAVE FURTHER QUESTIONS?**

This Anti-corruption Code of Conduct and the Policies attached as appendixes aim at providing you with clear guidelines on how to identify and prevent acts of bribery or influence peddling. General guidance and all awareness campaigns and trainings launched by the Air France-KLM Group may not need to be sufficient in some situations where you have doubt on to behave.

In such cases, you can raise your questions to your manager, compliance coordinator or compliance Officer. They will provide recommendations on construction of the provisions of this Anti-corruption Code of Conduct and Policies and on application of the rules to the issue you face.

**Contact are as follows:**



For Air France-KLM :

[mail.compliance.afkl@airfranceklm.com](mailto:mail.compliance.afkl@airfranceklm.com)

For Air France :

[mail.compliance@airfrance.fr](mailto:mail.compliance@airfrance.fr)

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