

GIFTS AND INVITATIONS POLICY

Lemarié Consulting International SARLU



I - Preamble

In accordance with the value of Respect for Laws, stated in the Code of Conduct of Lemarié Consulting International SARLU: "Lemarié Consulting International SARLU applies the laws and regulations in force in the countries where it operates and refrains from deliberately taking advantage of local shortcomings or inadequacies to deviate from the values of Lemarié Consulting International SARLU. In particular, all forms of corruption are rejected. Lemarié Consulting International SARLU will not participate in any form of financing of political parties or organisations.

II - Purpose of the Gifts and Invitations Policy

The purpose of this document is to define a set of principles, in terms of gifts given and received, to be applied by Lemarié Consulting International SARLU. Each Manager or Managing Director may adopt specific principles or rules to be applied to Lemarié Consulting International SARLU which are under his responsibility, provided that they are more restrictive than those indicated in the present policy.

III - What is a Gift?

A Gift is an object given free of charge, an accommodation or catering service, an invitation, or any other Advantage which the beneficiary enjoys free of charge and which has a value (in cash or in kind). The delivery of a Gift must be a purely courteous gesture within the framework of normal business relations, taking into account the customs of the country in which it takes place. Within Lemarié Consulting International SARLU, gifts can only be accepted if their value is symbolic and their frequency limited. They must fall within a purely professional framework. The maximum admissible amount can only be set by the Manager of Lemarié Consulting International SARLU, taking into account the local regulatory and economic context and the standard of living in the country in question, in this case Madagascar when Lemarié Consulting International SARLU intervenes on the territory of the Republic of Madagascar, and also respecting the legislation of the jurisdictions concerned, when it intervenes outside Madagascar.

IV - What is concerned?

This note applies to all business gifts offered and / or received during the activities of the company Lemarié Consulting International SARLU. It therefore concerns Gifts that may be given to external third-party partners, whether they are clients, suppliers or service providers for example, but also those received by employees of Lemarié Consulting International SARLU.

V - What is an Advantage?

An Advantage may include, in addition to a gift, any benefit, payment, service, loan, offer, hospitality, contribution, donation, grant or sponsorship, and more generally anything that is of interest to the beneficiary (in cash or in kind). What kind of risks are to be prevented? The aim is to prevent the risks of: - creating situations of conflict of interest, for example when the value of the gift (N.B. the value should not be assessed here solely in monetary terms) is such that the beneficiary is likely to no longer act exclusively in consideration of the interests of his employer, - obliging the beneficiary or putting him "under influence", - damaging the image of the company, and, generally, cases of corruption and influence peddling.

VI - Gifts given to a third party

This may include, for example:

- a gift given on the occasion of a special event such as:
- a traditional celebration, etc.
- a professional success, the conclusion of a long negotiation concerning the collaboration between the Group company and its partner, or objects of an advertising nature. In any event,
 - the value of these Gifts must be low;
 - the purchase of the Gifts may not be made through expense accounts; they must be purchased in accordance with the applicable purchasing procedures;
 - the distribution of these Gifts must meet objective criteria;
 - the awarding of Gifts must only concern persons directly involved in the business relationship with the company. Any Gift that does not meet the above criteria must be subject to prior authorisation by the Director of the function to which the employee is attached within the company, invitations to events such as: business meals, site visits, sporting or cultural events, events of a professional nature (fairs, exhibitions, training courses, etc.). In any event,

- these invitations must be justified in all circumstances by a professional purpose and form part of normal business relations;
- the payment of accommodation or travel expenses for third parties (clients or others) can only be accepted if it takes place on the occasion of a clearly identified operation, such as a visit to a site, training, etc., and if it is limited to the duration of the event. the amounts involved must remain within reasonable limits given their purely professional nature;
- they must not have the purpose or effect of obliging the beneficiary or placing him/her "under influence". These rules do not apply to invitations made in the context of communication operations organised collectively for all customers on the occasion of specific events (launch of a new product or service, inauguration of an establishment, etc.) and which fall under the Communication/Marketing budget. These invitations are sent to the general management of the client company or supplier, who will decide which employees may participate. In all cases, the delivery of Gifts or invitations to elected officials, representatives of the public authorities or the administration, or other public agents, may only be considered with the express prior written agreement of the Company's Manager and the function to which the employee is attached and the Company's Legal Department. The awarding of cash is prohibited. Any request for a Gift addressed to an employee of the Company by a person with whom he/she has a business relationship must be immediately brought to the attention of the Manager or the General Manager of the Company and to the Legal Department of the Company in writing.

VII - Gifts received from a third party

Gifts are only acceptable if they are of low value and received at the business address; - No gifts from suppliers or potential suppliers/agents are acceptable in a consultation or negotiation phase; - Gifts received are, as a general rule, given to a charitable association (Father Pedro's Humanitarian Association, Akamasoa, Madagascar
<https://www.madagascar-association.fr/nous-contacter/>

The acceptance of invitations to sporting, cultural or other events is only permitted if it is justified by a particular interest for the company and if it is previously authorised in writing by the Director of the function to which the employee is attached. It is strictly forbidden for any employee of the company to solicit in any way whatsoever a Gift or other benefit or favour from any business partner.

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<https://lemarie-consulting-international.com/en/code-of-ethics>