

Anti corruption Policy

The purpose of this policy is to establish a conduct of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption.

This policy applies to all employees (whether permanent, fixed term or temporary).

This policy covers :

- **Bribery** : the act of offering or accepting a benefit with the intention of influencing a person to behave outside the responsibilities of their role or to not act in good faith in order to gain a personal or business advantage that is not legitimately due ;
- **Gifts and hospitality** : gifts, meals, travel, entertainment and other hospitality often form part of a legitimate commercial relationship. It is important to be careful when offering, promising, giving or receiving anything of value, particularly involving any government official, to ensure that it does not constitute a bribe or corrupt payment or that it would not be perceived as engaging in improper conduct.
- **Facilitation payments** : form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage.

We do not make donations whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

We must declare and keep a written record of all gifts accepted or offered which will be subject to management review.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

LDTVO is committed to ensuring that no person will suffer detriment because they have reported a matter. Detriment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with reporting matter.



Olivier LE NAGARD
Directeur Général
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