BETTER WAYS

ANTI-CORRUPTION CODE OF CONDUCT

Message from the Chairman and Chief Executive Officer

Since its founding in 1978, the CMA CGM Group has been guided by strong human, family, and entrepreneurial values: **Excellence, Exemplarity, Imagination, Audacity, and Integrity**. These values shape our actions and decisions every day.

Our customers, partners, and society at large place their trust in us to uphold these principles. This responsibility is central to my long-term vision for the Group.

To ensure that our commitment to integrity is clear and actionable, I have asked that our anti-corruption rules be consolidated into a single, accessible **Anti-Corruption Code of Conduct**. This Code is designed to help each employee apply these rules in their daily work with confidence and clarity.

I invite you to read this Code carefully and to apply it consistently. Together, let's ensure that CMA CGM is recognized not only for its operational excellence and expertise, but also for its unwavering ethical standards and sustainable commitment.

Rodolphe Saadé

Chairman and Chief Executive Officer, CMA CGM Group

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INTRODUCTION

CONTEXT AND OBJECTIVES

Within the CMA CGM Group, our core values, including **exemplarity**, guide action and decision we make. Exemplarity means acting with **integrity**, **transparency** and **responsibility** in all circumstances. The Group's reputation is built on strict adherence to the law in every country where we operate. In line with the Group's Code of Ethics, each of us is committed to complying with all applicable laws and regulations wherever CMA CGM conducts business.

For instance, the Group upholds anti-corruption laws and enforces a **zero-tolerance policy toward all forms of corruption**. This Anti-Corruption Code of Conduct (the "Code"), supported by internal policies and procedures, serves as a practical reference to help employees navigate situations that may be unclear or questionable.

Engaging in, or being complicit in, acts of corruption or influence peddling can lead to **serious legal and financial consequences for both the Group and its employees**. Such actions can severely damage the company's reputation and its business practices. Legal or administrative proceedings may be initiated by authorities in the relevant jurisdictions. Importantly, the absence of any personal gain does not eliminate the risk of prosecution.

This Code does not cover every possible scenario. Employees are expected to exercise sound judgment and, when needed, refer to the specific rules established by their entity or consult their manager. Any questions regarding the application or interpretation of the Code should be directed to their manager, their local compliance officer or relay, or the Group Ethics and Compliance Department at ho.ethics@cma-cgm.com.

WHO IS THIS CODE INTENDED FOR?

This Code applies to all employees of the Group, including those working in entities controlled by CMA CGM. These entities are encouraged to adopt the principles and rules set out in the Code, while adapting them as needed to reflect the specific regulatory requirements of the countries in which they operate and their internal governance frameworks.

In all circumstances, if employees have any concerns or doubts about how the Code applies or should be interpreted, they are encouraged to contact their manager, their local compliance officer or relay, or the Group Ethics and Compliance Department at ho.ethics@cma-cgm.com.

ROLES AND RESPONSIBILITIES

The Code is managed by the CMA CGM Group Ethics and Compliance Department, which is responsible for its drafting and coordination of its distribution.

It is reviewed every three (3) years, or sooner if needed, to reflect changes in applicable laws and regulations, developments in the Group's activities, or updates to the corresponding risk maps.

The Human Resources Department ensures that the Code is enforceable for all CMA CGM Group employees.

UNDERSTANDING PATTERNS OF CORRUPTION

The different forms of corruption

ACTIVE BRIBERY

Active bribery refers to the act by which an individual, the briber, **directly or indirectly offers, promises, or provides an undue advantage** (whether financial, material, or of another nature) to another person, typically a public third party, with the **intent to influence** that person's behavior or decision **in breach of their duties or obligations**. This constitutes a criminal offense in many jurisdictions.

EXAMPLE

A Group employee grants financial advantages to a civil servant with decision-making power in the award of a public procurement contract.

PASSIVE BRIBERY

Passive bribery refers to the act by which an individual, the bribe recipient, **directly or indirectly solicits, accepts, or receives an undue advantage** (whether financial, material, or of another nature) in exchange for favorable behavior or a decision, in breach of their duties or obligations. This constitutes a criminal offense in many countries.

EXAMPLE

A Group employee receives lavish gifts and financial incentives from a supplier in return for favoring that supplier during the contract award process,

POINT OF ATTENTION

Offering (by the briber) or accepting (by the recipient) an undue advantage in exchange for something in return constitutes an offense, regardless of whether the other party follows through with the expected action.

PUBLIC CORRUPTION

Public corruption refers to the **abuse of power by public third parties** to obtain personal, financial, or political gain, often in exchange for bribes, favors, or through illegal or unethical practices.

EXAMPLE

A Group employee offers bribes to a public official responsible for granting administrative or regulatory authorizations, in order to secure approval to operate a public infrastructure.

PRIVATE CORRUPTION

Act by which a **person in the private sector** offers, solicits or accepts an undue advantage (money, gifts, services, etc.) in exchange for an action or decision that violates his/her professional duties or harms the integrity of his/her organization.

EXAMPLE

A Group employee accepts an invitation to a luxury trip from a customer in exchange for granting substantial discounts on Group rates.

Influence peddling and favoritism

INFLUENCE PEDDLING

- Influence peddling is a form of three-party corruption, in which an indivdual, acting as an intermediary, offers to leverage his/her influence with a public administration or authority to secure a favorable decision for a third party.

EXAMPLE

A civil servant solicits a job for their child from a Group employee, in exchange for using their influence to sway a public decision in favor of the Group.

EXAMPLE

A Group employee provides financial benefits to a public official who has decision-making authority over the awarding of a public procurement contract.

FAVORITISM

- Favoritism refers to the act of **granting an unfair advantage** to a company or individual in the awarding of a public contract or public service. It involves bypassing the principles of equal treatment among all candidates.
- Favoritism undermines fair competition and transparency. It is often associated with corruption and may be punishable under the laws of the country where the conduct occurs.

EXAMPLE

A government official maintains a friendly relationship with a CMA CGM Group employee involved in a public tender process. Despite being responsible for evaluating the bids submitted, the official alters the bid analysis report to favor the Group company in the awarding of the public contract.

RELATIONSHIPS WITH PUBLIC THIRD PARTIES

It is essential to engage with public officials in a transparent, ethical, and professional manner. Any attempt to exert undue or perceived influence is strictly prohibited.

COMPLIANCE ESSENTIALS

- **Any attempt** to obtain preferential treatment from a public official — through gifts, invitations, or any other form of advantage — is **strictly prohibited**.
- Any solicitation from a public third party must be firmly and unequivocally refused.
- Internal procedures govern interactions with public third parties, including:
    - **Procedure for gifts and hospitality**
    - **Procedure for Donation and sponsorship**

Who is considered a public third party?

A public third party refers to any person exercising an **official function on behalf of a State**, a **public organization** or a **State-controlled entity.**This includes, but is not limited to, elected officials, prefects, magistrates, customs officers, legal experts, and civil servants.

It also includes managers and employees of public or semi-public companies, representatives of international organizations (such as the UN or IMF), and foreign public entities. Additionally, **intermediaries and relatives acting on behalf** of such individuals are included.

By extension, in line with the US FCPA, any person who can influence a decision or transaction involving a public or quasi-public entity is considered a public third party.

How does this manifest?

Public third parties have the authority to issue permits, award contracts, allocate grants and subsidies, impose sanctions, and restrict access to goods and individuals.

When acting unethically, they may abuse this power by conditioning their decisions, or their inaction, on the receipt of gifts or personal advantages.

Why is it a problem?

Bribery involving public officials constitutes an abuse of public authority for private gain.

It is considered particularly serious and is subject to harsher penalties than bribery between private parties in many legal systems.

Examples

A thank-you gift

I maintain a cordial professional relationship with a ministry official responsible for overseeing my company's activities. I considered offering a case of wine as a gesture of appreciation for the authorization granted.

Such a gesture could be perceived as an act of corruption and would be contrary to **the CMA CGM Procedure on gifts and hospitality**.

Any gift offered to a public official must be strictly limited, clearly justified by the context, and fully compliant with applicable internal policies and legal requirements.

COMPLIANCE ESSENTIALS

- Act with the highest level of integrity and keep a **written record** of all interactions with public entities. Always request and retain proof of payment.
- Ensure that any gifts or donations comply with the four key criteria: **purpose, timing, frequency, and modest value**.
- Never offer a gift, invitation or donation during a **strategic moment** (e.g. during a tender process, commercial negotiation, or contract signing).
- Report any attempt at extortion to your manager or to the Ethics and Compliance Department at ho.ethics@cma-cgm.com.

An improper request during inspection

During an inspection, an official from the administrative authority suggests that offering a personal bonus could reduce the sanctions imposed on my company.

This request is illegal. Complying with it would expose me to both criminal and disciplinary consequences.

In such a situation, I must immediately inform my manager and contact my Ethics & Compliance representative.

Inappropriate influence during a tender process

My company has decided to participate in a public tender. The public sponsor suggested that donating school supplies to local schools could improve our chances of success.

Such a request is inappropriate. When responding to a call for tenders, employees must never attempt to influence the decision-making process through unfair or improper means.

Any form of donation or contribution must be assessed independently of the tender process and comply with the Group's Ethics & Compliance policies.

FACILITATION PAYMENTS

Even small, unofficial payments to public officials, intended to speed up administrative procedures, are considered a form of corruption.

COMPLIANCE ESSENTIALS

- Facilitation payments **are strictly forbidden**, even if they are culturally accepted or expected in certain countries.
- Facilitation payments are a type of corruption and are not tolerated under any circumstances.
- If you are placed in a situation where your physical safety is at risk and you are deprived of the freedom to act:
- You may proceed with the payment to protect yourself.
- You must immediately report the incident to your line manager and the Ethics & Compliance Department at ho.ethics@cma-cgm.com

What is a facilitation payment?

A bribe is an unofficial payment—often of small value—made to a public third party to expedite or facilitate an administrative or routine procedure.

These payments may be made directly or indirectly, and can take the form of money, gifts, or benefits such as cigarettes, alcohol, food, or invitations to restaurants or events.

All types of public officials may be involved, including customs officers, police, tax agents, and judicial authorities.

Bribes are often linked to procedures such as obtaining a work permit, visa, license, or accelerating customs clearance.

Why is it a problem?

Bribes are not legitimate. They result in the personal enrichment of public officials in exchange for services they are already obligated to provide without compensation.

These practices constitute a form of corruption, as they aim to influence a public official's actions or decisions, undermine fair business practices and impose a significant cost on the company, both financially and reputationally.

Examples

Attempted bribery during inspection

During an inspection of perishable goods, the customs officer offers to reduce the standard clearance time in exchange for bottles of alcohol.

This offer does not relate to any official fast-track service with a fixed price and proper invoicing. It constitutes an attempted bribe.

In such a situation, I must politely refuse the request, wait for the standard procedure to be completed, report the incident to my manager, and, if appropriate, remind the officer of the Group's zero-tolerance policy toward bribery and corruption.

COMPLIANCE ESSENTIALS

- **Refuse** politely but firmly any unjustified request for payment that could be construed as a facilitation payment and **keep a record of your refusal**.
- If your physical integrity is threatened, proceed with the payment and immediately inform your manager and the Ethics and Compliance Department at ho.ethics@cma-cgm.com.
- In the event of payment made under duress, document the transaction by any available means (invoice, receipt) and archive this information.

Safety first!

As part of an inspection procedure to certify the conformity of a Group asset, the inspector points out that the administrative documents are incomplete and that the asset is therefore non-compliant. The inspector offers to overlook these shortcomings in exchange for a $50 cash payment without issuing a receipt.

This request is illegal. If the documents are missing and cannot be provided immediately, I must acknowledge the non-compliance, note the associated penalty and take prompt corrective action. If the inspector's request is unfounded or exceeds legal requirements, I must:

1. politely inform the inspector;
2. reiterate the Group's anti-corruption policy and,
3. forward a copy of the inspection report, including the inspector's name, if possible, to my superiors.

A visa in a hurry

As a Group employee preparing for a business trip, I need to obtain a visa. The embassy informs me that the standard processing time is 15 days. However, an expedited service is available within 48 hours, subject to payment of a higher official fee.

This payment is authorized. It is part of a transparent and traceable premium service, available to all applicants, with a clearly stated rate and proper invoicing.

Using such services does not constitute a facilitation payment, as long as the process is official, documented, and accessible under the same conditions to the public.

GIFTS AND INVITATIONS

> Even a seemingly insignificant gift can influence a professional relationship or decision-making process. Giving or receiving any form of advantage must always be transparent, occasional, and reasonable.

COMPLIANCE ESSENTIALS

- Receiving and offering gifts and/or invitations is permitted only in accordance with the principles outlined in the CMA CGM Gift and Hospitality Procedure.
- **Before accepting or offering a gift or invitation, the following checks must be made:**
- **The giver's motivation** : determine whether the gesture is made as a courtesy or with the intent to obtain something in return.
- The **nature of the gift**: gift cards and the payment of transport or accommodation expenses are strictly prohibited,
- **Beneficiaries**: It is forbidden to offer gifts to family members and relatives. Extra caution must be exercised when dealing with public third parties.
- **Period and frequency:** Gifts and invitations are prohibited during negotiation periods. during negotiations.
- **Value and transparency:** Refer to the thresholds defined in the internal procedure to ensure the gift or invitation remains nominal and properly documented.

What are gifts and invitations?

A gift or invitation is any item of value, whether an object, service, or other benefit, offered, promised, or received in the context of a professional activity. It is considered a common business practice.

How does it work?

Such gestures typically occur within the framework of a business relationship with a third party, such as a customer, supplier, partner, or public third party. The item offered, promised, or received may take various forms: an all-expenses-paid trip, a meal, an invitation to a trade show, cultural or sporting event, a low-interest loan, the promise of an internship or job for a family member, the provision of accommodation, or a preferential rate for an event or service.

Why is it a problem?

These practices become problematic when they influence a professional decision, create a sense of obligation toward the giver, impair judgment or independence, lead to conflicts of interest, or amount to corruption or influence peddling.
Employees must always maintain their independence in dealings with the Group's partners.

Examples

Sweets during the holiday season

A commercial relations manager wishes to offer food baskets (wine, champagne, chocolate, or fruit) to customers at the end of the year as a gesture of appreciation.

Such gifts are acceptable, provided their value remain reasonable and the practice complies with the conditions set out in the **CMA CGM Gifts and Hospitality Procedure** (timing, recipients, transparency, etc.),

COMPLIANCE ESSENTIALS

- **Before accepting a gift or invitation:**
- Ask yourself about the giver's intention, ensure that the nature and value of the offer comply with the **CMA CGM Gift and Hospitality Procedure** as well as the laws of the country in which you operate.
- Ensure that accepting the offer will not create a conflict of interest.
- If the offer does not comply with internal procedures, refuse it, politely but firmly.
- In case of doubt, ask your line manager or the Ethics and Compliance department.

A good meal for a good agreement

Following the successful conclusion of lengthy negotiations, I would like to invite a new partner to a restaurant to celebrate the agreement.

This invitation is authorized, provided it takes place after the agreement has been signed and the amount complies with the **Corporate Travel & Safety Policy**.

An all-inclusive trade show

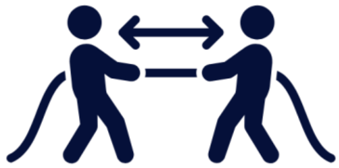
A partner invites me to attend a two-day trade show held at a luxury hotel. The invitation includes admission to the event, transportation, accommodation, and meals.

While the partner may cover the entrance fee, as it is a reasonable and transparent gesture, they must not pay for transportation or accommodation. I must inform the partner of this and remind them of the Group's internal rules regarding gifts and hospitality.

Music does not legitimize morals

As a purchasing negotiator, I receive a ticket to a private concert from a supplier who has just submitted a bid.

Accepting a gift from this supplier at such a sensitive time could be perceived as an attempt to influence my professional judgment. I must refuse the gift, return it, and inform my superiors.



CONFLICTS OF INTEREST

> **Our private ties can influence our professional decisions. Declaring these ties to our employer will protect us.**

COMPLIANCE ESSENTIALS

- Conflicts of interest are not inherently reprehensible. However, the fraudulent or inappropriate use of such situations may be subject to disciplinary or legal consequences.
- Any personal situation that could potentially conflict with your professional responsibilities must be declared to your manager, in accordance with **the CMA CGM Conflict of Interest Policy**.
- Employees in roles exposed to a higher risk of corruption are required to submit a declaration annually, even if no actual or potential conflict of interest exists on **My Compliance**.

What is a conflict of interest?

A conflict of interest arises when an employee has personal ties or interests that may interfere, or appear to interfere, with their professional responsibilities, potentially preventing them from acting in the best interests of the company.

How does this manifest itself?

Private interests can take many forms.

They may be moral, such as involvement in an association; financial, such as holding shares in a company or engaging in another professional activity; or personal, such as interests involving a close relative, friend, or third party.

They may also arise from relationships established with the Group's partners, competitors, or other stakeholders in the economic or public sphere.

Why is it a problem?

A conflict of interest exists when these private interests interfere, or appear to interfere, with an employee's ability to act independently, objectively, and loyally in the best interests of the company.

These situations can be complex and are not always easy to identify.

However, they must be taken seriously, as they can lead to decisions that compromise integrity and, in some cases, result in acts of corruption punishable by law.

Examples

The past in the present, beware of conflict

I recently joined the company after working as a consultant. In my new role, I need to select a consulting firm for a specific project. Naturally, I consider my former colleagues, whose expertise I know and trust.

My previous ties with this team may raise questions about my objectivity. To avoid any perception of bias or conflict of interest, I must inform my manager of the situation and refrain from participating in the decision-making process.

COMPLIANCE ESSENTIALS

- To assess whether a situation may lead to a conflict of interest, I must reflect on my professional responsibilities and the reality—or appearance—of the facts.
- I should ask myself whether my own activities, or those of someone close to me, could compromise my independence or loyalty to the Group.
- For example, would I feel indebted to a friend or third party if I agreed to take a specific action? Could my decision-making be influenced in a way that undermines my objectivity?
- If there is a risk of conflict, I must withdraw from the activity in question.
- I must never conceal personal, financial, or moral ties with the Group's partners.
- In case of doubt, I should consult my line manager and the Ethics and Compliance Department.

A blood tie in the balance

As the person responsible for selecting files for a call for tenders, I learn that my cousin, a company director, wishes to participate.

When a Group company sponsors a tender process, employees must not favor any participant for personal reasons. My family ties may compromise my impartiality. I must not share any confidential information with my cousin. If he/she is involved in the process, I must declare this relationship to my superiors and to the Ethics and Compliance Department. My superiors will then take the necessary measures to ensure transparency and fairness.

Sponsorship and personal ties: proceed with caution

I have been approached by a sports association where my child works, requesting sponsorship from my company—specifically, the purchase of equipment bearing the company's logo.

Although the request may appear legitimate, my personal connection to the association could raise concerns about the objectivity of the sponsorship and suggest an unjustified advantage. I must inform my superiors and consult both the Communications Department and the Ethics and Compliance Department to obtain prior authorization.

BUSINESS PARTNERS & THIRD PARTIES

Our business partners are essential to the smooth running of our activities and have an impact on our reputation and corporate responsibility. Let's select them with care.

COMPLIANCE ESSENTIALS

- Before entering into any business relationship, and regularly thereafter, third parties must undergo a compliance assessment. They are required to sign and adhere to **the CMA CGM Third Party Code of Conduct** or an equivalent document.
- Throughout the duration of the relationship, our business partners are expected to uphold our values and honor their contractual compliance obligations.
- Integrity and transparency must guide all interactions.
- Ongoing due diligence—including checks on reputation, qualifications, integrity, criminal background, and exposure to risk—must be conducted and updated regularly.
- We must be able to substantiate our choice of partners and the legitimacy of the services provided.
- It is important to note that we may be held accountable for the conduct of our partners and their subcontractors.

What is a business partner?

A third party may take many forms. It can be an organization, a company, or an individual with whom the Group maintains a business relationship. This includes suppliers, customers, intermediaries, members of joint projects, co-shareholders, and recipients of donations or associations.

How does this manifest itself?

The Group faces corruption risks in its interactions with third parties, particularly in the context of consortiums, joint ventures, and relationships involving intermediaries, suppliers, or recipients of partnerships or donations.

Why is it a problem?

Certain partners may present heightened corruption risks, which can lead to serious legal, financial, reputational, and commercial consequences. These risks may stem from factors such as the partner's size, their nature, particularly if they are public entities, their sector and country of operation, or their reputation.

Examples

Too good to be true

You are responsible for the technical design of a project. A supplier, who has been informed about the project and is interested in participating, offers you a trip to Paris, including accommodation, that is unrelated to the project.

This offer is inappropriate and constitutes a breach of ethical standards. You must immediately inform your manager and report the situation to the Ethics and Compliance department.

COMPLIANCE ESSENTIALS

- Report any suspicion that a partner may be acting in violation of the **Third Party Code of Conduct** or Group policies to your manager.
- Transparently disclose any actual or potential conflicts of interest to both your line manager and the **Ethics & Compliance Helpline**.
- Ensure that all services provided by partners, as well as related payments, strictly comply with contractual terms.

Always document and archive your communications and financial transactions systematically.

Priority service

A long-standing customer urgently requests a service and asks to be given priority. As a gesture of appreciation, they offer you a generous gift.

The urgency of the request, the historical relationship with the customer, and the offer of a gift must not influence your decision-making. While we are committed to delivering the highest level of service, this must never come at the expense of our ethical standards.

You should politely decline the gift and inform your manager of the situation.

A good reputation isn't everything

You are preparing to enter into a partnership with a company led by a former colleague and friend. Believing the company has an excellent reputation, you assume that no due diligence is necessary.

Relying on personal relationships or perceived reputation to bypass required checks can expose the Group to significant risk. Favoring a company due to private ties may compromise objectivity and harm the Group's interests. Such relationships must be transparently disclosed to your manager and to the Ethics and Compliance department.

Regardless of reputation, all partners must undergo the compliance checks mandated by the Group.

Donation and sponsorship

Donations and sponsorships are powerful tools for aligning our company's image with meaningful causes and positive values. However, because our reputation is a valuable asset, such initiatives must be approached with care and discernment.

COMPLIANCE ESSENTIALS

- Donations and sponsorships are permitted, provided they comply with the Group's **Donation and sponsorship Policy**.
- Special care must be taken when support involves public third parties. Any contribution intended to secure a contract, administrative authorization, favorable decision, or any undue advantage is strictly prohibited.
- Personal benefit from a donation or sponsorship may constitute a criminal offense, such as illegal interest-taking.
- Charitable donations must never be made in cash or to an account held by an individual.
- The Group also prohibits contributions to political, religious, or philosophical causes, as well as to any organization engaged in unlawful activities.

What are donations and sponsorships?

A donation is a contribution, whether financial, material, or in-kind, made to an organization that serves a cause of general interest (such as humanitarian aid, social development, environmental protection, or research), with no expectation of return.

A sponsorship involves providing financial or material support to an organization or event with the intention of receiving a direct, measurable benefit in return, such as increased visibility or brand recognition.

How does this manifest itself?

You may receive a request for a donation or sponsorship in the course of your professional duties.

These requests can come from individuals, companies, associations, cultural or sporting events, or public authorities, and may involve support in the form of funding, materials, or skills for humanitarian, social, or local development initiatives.

Why is it a problem?

Improperly managed donations and sponsorships can (i) conceal unjustified advantages or be diverted to facilitate bribery; (ii) create or obscure personal relationships that may influence professional decision-making; (iii) associate the Group's image with individuals, events, or causes that are not aligned with our values,

Examples

A noble intention, yet not without potential pitfalls

A charitable association providing aid to populations affected by natural disasters, and financed by a government with which the Group maintains commercial ties, requests material support to transport essential equipment.

While the request may appear legitimate and aligned with humanitarian values, our existing business relationship with the government could create the perception of undue influence or attempted bribery. To safeguard the Group's integrity and reputation, such requests must be submitted to the Communications Department for validation and referred to the Ethics and Compliance Department for integrity checks .

COMPLIANCE ESSENTIALS

- **Before** making a donation or entering into a sponsorship agreement, it is essential to follow a structured due diligence and approval process.
- **Begin by identifying** the applicant, understanding the purpose of the request, and assessing the legitimacy and relevance of the proposed initiative. With the support of the Ethics and Compliance Department, verify the integrity of the beneficiary organization, this includes confirming the existence of real and lawful activities, alignment with the Group's values, and the reputation and integrity of its legal representatives.
- Ensure that the proposed donation or sponsorship does not create a conflict of interest. Prior authorization must be obtained from your line manager, the Communications Department at ho.communicationcorporate@cma-cgm.com, and the Ethics and Compliance Department at ho.ethics@cma-cgm.com.
- With the assistance of the Legal Department, formalize the arrangement in a written agreement that clearly defines the commitments and the value of the donation or sponsorship. Once approved, monitor the use of the funds to ensure they are applied as intended.
- Under no circumstances should payments be made in cash or to third-party or offshore accounts. All financial transactions must be traceable and directed to the official account of the beneficiary organization.

Ensuring alignment with our principles

An association that distributes school supplies has asked you to donate used computers.

Even if the request appears well-intentioned, it must be handled with care. First, ensure that the request complies with the Group's internal rules on donations and sponsorships. Then, verify that the values and activities of the beneficiary organization align with those of the Group.

You must forward the request to your line manager and the Communications Department for approval and submit it to the Ethics & Compliance Department for integrity checks.

Sport as a strategic communication tool

The CMA CGM Group may be invited to financially sponsor a sporting event.

Before committing, it is essential to verify the eligibility of the project—ensuring that it aligns with the Group's values and that the organizers demonstrate integrity and transparency.

Internal authorization must be obtained through the appropriate channels, including the Communications Department and Ethics & Compliance.

If the Group's logo is to be used, its strategic value and visibility must be clearly defined and contractually protected.

LOBBYING AND INTEREST REPRESENTATION

> **Informing public decision-makers about our strategic priorities is essential to the Group's long-term positioning. As a regulated activity, interest representation must always be conducted with transparency and integrity.**

COMPLIANCE ESSENTIALS

- Interest representation is permitted, provided it complies with the conditions outlined in the Group's **Lobbying and Interest Representation Policy**.
- All such activities must adhere to the laws and regulations governing lobbying in the country where they are conducted.
- Any solicitation must be based on a legitimate and demonstrable need, undergo standard internal checks, and be governed by a formal contract.
- It is strictly prohibited to offer gifts or invitations to public decision-makers in connection with a public decision

What is lobbying and interest representation ?

Interest representation refers to the act of engaging with public decision-makers to influence, promote, and defend the Group's strategic interests. It is a regulated activity that must be conducted with full transparency and integrity.

How does this manifest itself?

Interest representation may take the form of responding to requests from public bodies to inform their decisions, advocating for the Group's positions to institutions, or designating internal representatives, external firms, or associations to act on the Group's behalf.

Why is it a problem?

If internal rules are not followed, interest representation can damage the Group's reputation in the eyes of public third parties and the broader public.

Misuse of this activity may result in prohibited forms of influence, such as corruption or illegal interest-taking, which can lead to criminal and disciplinary sanctions.

Examples

Questionable integrity

You are considering hiring a lobbyist to represent the Group's interests in dealings with public authorities. Although the candidate is highly competent, they were accused of influence peddling last year.

Despite their qualifications, their integrity is in doubt and could pose a reputational risk to the Group. Before proceeding, you must consult the Ethics and Compliance Department to conduct a thorough integrity check. If concerns remain unresolved, you must refrain from engaging with the individual.

COMPLIANCE ESSENTIALS

- Before engaging in interest representation activities with public officials, whether at the local, national, European, or international level, you must first identify yourself to cmacgm.institutional@cma-cgm.com.
- You are required to declare any actual or potential conflict of interest to your manager and the Ethics & Compliance Department.
- If a third party is appointed to act on behalf of the Group, their integrity and reputation must be verified in advance.
- The relationship must be formalized with the support of the Legal Department through a standard contract that clearly outlines the obligations of each party. This contract must include a reinforced ethical clause prohibiting any gifts or invitations that do not comply with the Group's **Gifts and Hospitality Policy**.
- All actions taken and expenses incurred must be documented, and supporting records must be systematically archived.

Transparency in the public interest

As part of a legislative initiative on decarbonization, the Group proposes a meeting between an environmental expert and the Member of Parliament leading the working group. An employee involved in the initiative discloses that their nephew works for the MP, though not on this specific project.

Even if the relationship appears distant, personal ties can create real or perceived conflicts of interest. These situations are acceptable only if handled transparently. The employee must obtain prior approval from their manager and inform the Ethics & Compliance Department to ensure alignment with Group policies and to avoid any risk of undue influence

Lack of rigor in interest representation

You have been working with an interest representative tasked with promoting the Group's interests to local public officials. However, their monthly reports are incomplete, missing key details such as the names of contacts, meeting content, dates, and locations. Additionally, invoices and receipts for incurred expenses are absent.

This lack of traceability raises concerns about the third party's integrity and exposes the Group to reputational and legal risks. Before authorizing any payment, it is essential to collect all required documentation in accordance with the contract. The situation must also be reported to your manager and the Ethics & Compliance Department for review.

ANTI CORRUPTION CODE OF CONDUCT IMPLEMENTATION

THE ROLE OF GROUP ENTITIES

Group **entities** are essential to the effective implementation of the Anti-Corruption Code of Conduct. They are responsible for **embedding** its principles into daily operations and establishing control mechanisms to ensure compliance. Each entity must designate responsible managers, deliver **regular training** to employees, and maintain transparent communication on anti-corruption policies. Collaboration across entities is also key, **sharing best practices** and lessons learned strengthens the Group's overall anti-corruption framework.

THE ROLE OF EMPLOYEES

Employees are at the heart of the Group's anti-corruption efforts. They are expected to uphold the principles of the Code in all professional activities and report any suspected violations through the appropriate channels. **Active participation** in training and a solid understanding of anti-corruption procedures are essential. **Employees play a vital role** in fostering a **culture of integrity** and transparency, encouraging ethical behavior among colleagues, and raising awareness of corruption risks.

INTERNAL WHISTLEBLOWING SYSTEM (*Speak Up*)

The CMA CGM **Ethics and Compliance Helpline** enables employees to report conduct that may breach the Group's **Code of Ethics or Anti-Corruption Code of Conduct**. All employees are encouraged to use this channel in accordance with established procedures. The **system guarantees confidentiality and protects whistleblowers** acting in good faith from any form of retaliation, in line with the Group's **Whistleblowing and Non-Retaliation Policy**. By speaking up, employees contribute to a culture of integrity and reinforce the effectiveness of the anti-corruption program

DISCIPLINARY SANCTIONS

The Anti-Corruption Code of Conduct applies to all Group employees, regardless of location—as well as to third parties acting on the Group's behalf.

Any employee who engages in, facilitates, or knowingly ignores acts of corruption or influence peddling may face **disciplinary action**, up to and including dismissal, in accordance with internal regulations. Such conduct may also result in **severe civil or criminal penalties**. In certain cases, the Group itself may be held criminally liable.

Contacts

Your company's Ethics & Compliance contact

The Group Ethics and Compliance team
ho.ethics@cma-cgm.com

Your company's local alert line

The Group Ethics and Compliance Helpline
ho.ethicsalert@cma-cgm.com

Via the dedicated platform
:

MyCOMPLIANCE

Further information is available on our **intranet**: