

Anti-Corruption Policy

First publication : 01/11/2017

Current publication : 30/09/2021

Version 3

Document type : Policy

Scope : Global



Document name: Anti-Corruption Policy

Purpose:

As stated in our Trust Charter, the Anti-Corruption Policy Policy sets forth Schneider Electric's comprehensive anti-corruption policy;

The Policy outlines the risks related to corruption and describes the behaviors expected of Schneider Electric employees to mitigate those risks.

Audience: All Schneider Electric employees and affiliates

Content:

1. Our Vision
2. Our Rules of Conduct
3. How raise a concern ?
4. Sanction Policy

Confidentiality Status: Public restricted

Local adaptation authorization: Possible to update the Policy at local level by integrating risks identified by local corruption risk mapping and specific local laws; such amendments are under Peter formal approval after review by Group Compliance Department.

Document Owner: Audrey Morin, Group Compliance Director

Document Reviewer: Nicolas Vlieghe, SVP Chief Compliance Officer

Document Approvers:

- Jean-Pascal Tricoire, Chief Executive Officer & Chairman
- Hervé Coureil, EVP Chief Governance Officer & Secretary General

2. Rules of Conduct

Form: direct (directly by the company, its officers, directors or employees) or indirect (through an intermediary, business agent,

Recipient/giver: our Anticorruption Policy applies to both private and public sectors, including but not limited to state-owned companies, government representatives and any other public officials.

In this Policy, and are used as synonyms.

How to recognize risky situations? ("Red flags")

Beyond a direct request to pay a bribe there are many

2.2 Additional rules concerning specific risks

2.2.1 Gifts and hospitality



A business courtesy, also called gifts and hospitality, means anything of value that you give or receive, either directly or indirectly.

It may be a tangible or intangible benefit including, but not limited to, goods or services, promotional products, hotel accommodations, entertainment (tickets to events, recreational activities, etc.), company events, meals, drinks, transportation (including upgrade of airline sitting class), gratuities, discounts, personal favors or anything else with a monetary value.

Business courtesies help build good business relationships, but they can be interpreted as corruption.



You must ensure that:

- All gifts, invitations and hospitality packages offered are appropriate and in line with our global and local Gift & Hospitality policies;
- Before accepting or receiving a gift, a benefit or an invitation, you consider how it might be perceived publicly and refuse those that might put you in a conflict of interest;
- You are transparent with your manager so as to avoid any suspicion of violating the internal declaration procedures regarding gifts, invitations and other benefits;
- You never give cash as a gift, whether directly or indirectly, even if such gifts are permitted under local laws or acceptable according to local practices.
- You comply with Gift & Hospitality policies and internal authorization process regarding business events, by first contacting your Compliance Officer.



Case 1: You are planning to travel abroad to meet with foreign public officials to obtain some legal authorizations. To make sure that the public officials will support your case, you offer him a 6-bottle wine box and

2.2.2 Facilitation payments

A facilitation payment involves paying a sum of money, directly or indirectly, to a public official (for example, a customs or immigration officer) to perform or speed up administrative formalities.

These payments are often made in the context of the processing of a visa application, the issuance of an authorization, a permit or a license or customs formalities.

2.2.5 Conflict of interests

Conflict of interest arises when an employee's personal interest conflicts with those of Schneider Electric, leading to affect his/her judgement in performing his/her work.

Situations where potential conflicts of interest arise are:

- Being officer or director of any company not belonging to the Schneider Electric Group;
- Having directly or indirectly, any financial relationship with any Schneider investment purpose;
- Having directly or indirectly any personal relationship with any Schneider interaction with external parties;
- Engaging or having interests (in either case, directly or indirectly) in any other activity, business or employment in a manner that interferes with his/ her job position at Schneider Electric or which may constitute a breach to labor laws;
- Having a political mandate which may interfere with his/her job position.

Engaging or having interests in any other activity, business or employment in a manner that interferes with his/ her job position at Schneider Electric or which may constitute a breach to labor laws;



You are the decision-maker in the selection process for a new supplier and your uncle is the representative of one of the applicants.

You must report this conflict of interests and ask to be replaced in the selection process of the new supplier.
It is essential to take decision only in the best interest of the company, based on objective criteria of selection.

Sponsoring is a form of marketing by which the company pays all or part of the costs associated with a project or program, in exchange for visibility on communication media or events.

Such initiatives are part of our corporate citizenship, part of our Trust Charter. However, they may represent significant risks of unlawful use of money and then corruption.

In addition, the Group refrains from making any financial contribution to candidates, elected representatives or

3. How to raise a concern?

In case of serious doubt about the behavior of a third party or an employee which will be potentially contrary to the provisions this Anticorruption Policy, please report your concern through Trust Line or to your Compliance Officer.

- Trust line website: