



SEAFRIGO GROUP

SPONSORING & PATRONAGE POLICY AT SEAFRIGO GROUP

JUNE 2025

SUMMARY

1	Purpose of the Policy	3
2	Definitions	
3	Our Commitments	4
4	Priority Intervention Areas	5
5	Selection Criteria	6
6	Ethical Evaluation and Compliance	
7	Review Process	7
8	Monitoring, Evaluation, Control and Renewal	8
9	Governance, Risk Prevention and Training	
10	Risk Prevention	9
11	Policy Review	

Purpose of the Policy

This policy aims to structure the **sponsoring** and **patronage** initiatives undertaken by Seafrigo Group, clearly distinguishing them based on their objectives and corresponding considerations. It aligns with an ethical approach, in compliance with the Group's CSR strategy, and meets regulatory requirements, including those set forth by the **French Anti-Corruption Agency (AFA)**.

Its objectives are to:

- Support general interest initiatives through philanthropy/patronage;
- Promote the Seafrigo Group brand through sponsoring;
- Prevent any risk of compromising integrity (corruption, favouritism, conflicts of interest);
- Ensure transparency, traceability, and compliance of commitments.

Definitions

Patronage: Material or financial support (in cash, in kind, or in skills) provided to a work or organization of general interest, **without any equivalent direct or indirect consideration** for the donor. This initiative is based on an **altruistic act** and benefits from a specific tax regime.

Sponsoring (or « parrainage »): Material or financial support provided to an activity, organization, or event, in exchange for **advertising or commercial benefits** (such as visibility, hospitality, brand promotion, etc.). This constitutes a **commercial expenditure**.

3

Our Commitments

In line with its values —Integrity, Diversity & Inclusion, Entrepreneurship— Seafrigo Group views patronage and sponsoring as tools to affirm its role as a responsible corporate citizen, strengthen ties with local communities, and promote initiatives of general interest with a positive impact.

Seafrigo Group is committed to:

- Promote initiatives aligned with our **values (Integrity, Diversity & Inclusion, Entrepreneurship)**;
- Comply with applicable **regulatory and fiscal frameworks**;
- Prevent any situation of **conflict of interest or undue advantage**;
- Ensure **traceability, transparency, and proportionality** of counterparty benefits;
- Formalize each operation through a **written agreement** that includes a specific anti-corruption clause.



4

Domaines d'intervention prioritaires

We support projects that promote public-interest values, particularly in the following areas:

- **Medical Research:** Support for the fight against cancer and health research.
- **Water Sports:** Promotion of water sports, particularly sailing, in connection with the Group's maritime identity. The Group also aims to promote access to sports for all by supporting initiatives that democratize sports practice across various disciplines.
- **Culture & Heritage:** Support for artistic expression, cultural dissemination, and access to culture for employees.
- **Fight Against Waste:** Partnerships aimed at reducing food waste and waste in general.
- **Environment:** Projects in favor of biodiversity, energy transition, and reduction of carbon footprint.
- **Local Development:** Engagement in projects that promote the economic and social development of regions where Seafrigo Group operates, supporting local initiatives to strengthen infrastructure and improve community quality of life.
- **Children's Well-being:** Actions in favor of children's well-being, including educational projects, access to health, and support for initiatives aimed at improving their quality of life and future.
- **Support for Healthcare Institutions:** Support for public and non-profit private healthcare establishments to contribute to improving patient reception, care, and well-being, particularly for the most vulnerable.



5

Selection Criteria

To be eligible for Seafrigo Group support, projects (sponsoring or patronage) must meet the following criteria:

- Ensure alignment with our **values and CSR commitments**;
- Be supported by a **transparent entity** (legal person or, exceptionally, a natural person);
- Present a **verifiable impact** (social, environmental, or visibility);
- Respect to the principles of political, union, and religious **neutrality**;
- Not serve as a means of **personal promotion** or **private enrichment**;
- Be **documented** and **assessed** through a prior **ethical screening** process (detailed in the following section).

6

Ethical Evaluation and Compliance

Mandatory Ethical Screening

Each project undergoes a rigorous evaluation to **prevent risks to integrity**, including but not limited to:

- **Conflicts of interest**, familial or functional ties between the Group and the beneficiary;
- **Reputation of the beneficiary organization** (media research, criminal background);
- Existence of **accounting records** and an **agreement** formalizing commitments and anti-corruption obligations.



Review Precess

Requests may originate from internal employees or external organizations.

All requests should be sent to the following address:

communicationgroupe@seafrigo.com, accompanied by the official form and a project presentation.

1 → Submission of the complete applicatio, to the official address (communicationgroupe@seafrigo.com).

Specifically, the following documentation should be collected from the partner:

- Status,
- K-bis
- Financial statements,
- Information on legal representatives and beneficial owners,
- Bank Details.

The file must also include evidence of the preliminary checks conducted.

2 → Ethical and operational analysis by the Communications Department, with support from the Legal and Risk Management departments.

The Compliance function will provide an opinion on each request and may, if necessary, exercise its veto power.

3 → Separate processing of patronage and sponsorship files, according to specific tax and governance criteria.

No agreement may be signed without obtaining approval from all relevant functions, based on the evaluations conducted.

4 → Collective decision-making through the Communications, Legal, Risk Management departments, and the General Management. Approval from each department is formalized in writing.

5 → Signing a written agreement prior to any commitment.

6 → The instruction files, including all collected documents, the approval decision, and the signed agreement, are centralized and maintained by the Communications Department.

8

Suivi, évaluation et contrôle

- Each operation is subject to **contractual and financial monitoring**;
- Beneficiaries must submit an execution or impact report (patronage) or a visibility assessment (sponsoring);
- Ad hoc **internal controls** may be conducted and integrated into the Group's control plan;
- Operations are included in the **annual CSR reporting**;
- Throughout the relationship, regular checks will be carried out to verify the existence of the commercial counterpart;
- Upon payment execution, the destination of funds will be scrupulously verified (bank details as per the contract vs. bank details for the transfer, etc.);
- Any renewal of a partnership must follow the same evaluation and validation process.

9

Governance, Risk Prevention and Training

- The Communications, Legal, and Risk Management departments oversee the policy, ensure its compliance, and validate the files;
- Personnel involved receive **training on corruption prevention** (patronage/sponsoring risks, conflicts of interest, etc.);
- The **internal alert system** is open to partners and beneficiaries.

All files, whether approved or rejected, are centralized and referenced by the Group's communications department.

10

Risk Prevention

Seafrigo Group applies a zero-tolerance policy towards any behaviour that may constitute **corruption, favouritism, or illegal tax practices**.

Internal procedures strictly govern relationships with beneficiaries to prevent conflicts of interest and ensure the integrity of commitments.

11

Policy Review

This policy is reviewed every **two years** or in the event of significant changes to the regulatory framework or the Group's strategic priorities.

For more information

Contact us at communicationgroupe@seafrigo.com for questions and project submissions.





www.seafrigo.com

Seafrigo Group

22 rue de New-York

76600 Le Havre - FRANCE

Tel : +33 (0)2 35 24 77 67

Fax : (0)2 35 24 69 66

