

Alstom Ethics & Compliance

Certification of Alstom compliance policy for Dealing with Sales and Marketing Consultants



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“Ethical rules and values guarantee our future”

Patrick Kron, Chairman and CEO



BUSINESS ETHICS & PERSONAL INTEGRITY

We must be **irreproachable** in how we do business.

Our individual behaviour must be **irreproachable** in all professional life situations.

The Alstom Integrity Programme

The Ethics, Compliance & Sustainability Committee

The Alstom Code of Ethics – 20 languages

Instructions and Guidelines

Certified rules for Dealing with Sales Consultants

The E&C team - 20 people and The E&C Ambassadors - 200 people

The e-learning module e-Ethics – 8 languages

The Alstom Alert Procedure

Ethics section on intranet and on www.alstom.com



We are Shaping the future | ALSTOM

The Objectives

- Like all infrastructure companies operating in highly complex markets worldwide, Alstom may need to work with specialised sales and marketing consultants who bring their particular knowledge to their market, with its own laws, regulations and decision-making process.
- As the use of those consultants may represent a risk in terms of compliance with prevention of corruption laws, Alstom has put in place rules, guidelines and procedures for dealing with sales and marketing consultants at the beginning of the 2000's.
- Over the last decade Alstom has permanently strengthened those rules to ensure that the sales and marketing consultants comply with their obligations and do not undertake illegal practices or unlawful payments.
- To assess the relevance of these rules, Alstom called on the “Ethic Intelligence International” organisation to review and evaluate them.

The Process

- Supported by the Alstom's CEO, the Certification process took place between November 2008 and March 2009.
- Ethic Intelligence International established the certification methods, monitored and reviewed the provided material,
- The audit was led by SGS on 7 Alstom sites, in 6 countries, with 60 people met.
- The audit report was evaluated by the Ethic Intelligence Certification Committee.
- *The conclusion was that the rules and procedures implemented by the Alstom corresponded to international best practices both in definition and execution.*
- *The Ethic Intelligence Certificate was granted on March 12th, 2009 for a period of 2 years.*

The Benefits

- Clear statement at internal level that Alstom is fully committed to strictly apply the certified procedures corresponding to the highest international standards in terms of anti-corruption laws and regulations.
- Assurance that Alstom has implemented the appropriate rules to prevent corruption in its relationships with sales and marketing consultants.
- Benchmark with international best practices.
- Continuous improvement and strengthening of the culture of integrity.
- Lever for resisting to changes requests that would weaken the certified compliance policy.
- *In 2011, Alstom is engaged to launch the certification process to renew the Ethic Intelligence Certificate.*

The Certificate



www.alstom.com

<http://www.alstom.com/ethics/>

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