Alstom **Ethics & Compliance E&C** Ambassadors



December 2011



The Alstom Integrity Programme – 1/2

- Tone at the Top
 - ⇒ "Ethical rules and values guarantee our future"

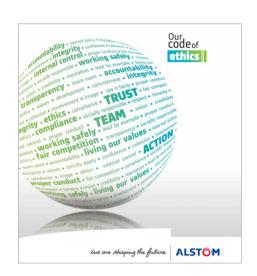
 Patrick Kron, Chairman and CEO
- Independence and authority
 - ⇒ The SVP Ethics & Compliance reports to the Group General Counsel and has a direct access to the Chairman and CEO, to the Deputy CEO
 - ⇒ and to the Ethics, Compliance and Sustainability Committee of the Board.
- Adequate resources
 - ⇒ A dedicated E&C Department comprising 20 people, including 11 Compliance Officers,
 - ⇒ An E&C Ambassadors Community of 250 volunteers who diffuse the culture of integrity within the whole Group.



The Alstom Integrity Programme – 2/2

Content

- ⇒ Alstom Code of Ethics available in 21 languages
- ⇒ Group Instructions applicable to all employees
- ⇒ The Alstom Alert Procedure
- Implementation
 - ⇒ E-Ethics e-learning module in 8 languages
 - ⇒ Intense internal communication means: dedicated intranet section, posters, newsletters, ...
 - ⇒ Ethics section on <u>www.alstom.com</u>
- Monitoring
 - ⇒ Close collaboration with Internal Control and Audit
 - ⇒ Certification by ETHIC Intelligence of the Alstom Integrity Programme. **ALSTOM**



STAY IN THE BASKET

Objectives of the Alstom E&C Ambassadors Community

- Reinforce the resources of Ethics and Compliance
 - ⇒ Multiplying by more than 10 the E&C Resources
 - To support the implementation of the Alstom Integrity Programme
 - To develop the Alstom Integrity culture in a transversal manner in its ethical dimension (i.e. not responsible for Compliance)
- Initiative launched in May 2010 and supported by the Executive Committee:
 - Resources to help the E&C Ambassadors in their mission
 - Full support from the E&C Department, from the Group General Counsel, and from Alstom management.



Alstom E&C Ambassadors Community Profile

- 250 E&C Ambassadors in 54 countries
- Coming mainly from the Legal, Finance and HR functions or being Country Presidents in charge of governance in their countries
- All motivated volunteers
 - Taking the role in addition to their responsibilities and committed to the cause
 - Close to the operations and to action and thus can be the 'eyes and the ears' for strengthening the ethical culture



Alstom E&C Ambassadors Roles & Responsibilities – 1/2

E&C Awareness

- Take every opportunity in his/her business area or sphere of influence to make the Alstom Code of Ethics known (Articles in Newsletter, Slides in General Presentations,)
- Be a relay for the Alstom Integrity Programme implementation
 - Help to disseminate the keys Ethics & Compliance messages
 - Promote the existing Group Instructions ⇒ Gifts & Hospitality, Political Contributions, Charitable Contributions, Sponsorship, Conflicts of Interest.
 - Encourage people to visit and use the Ethics section on the intranet

E&C Culture development

- Take initiatives to promote E&C: events, campaigns, ...
- Encourage people to complete the existing E&C e-learning modules
- Organise E&C Awareness sessions in his/her business area or sphere of influence



Alstom E&C Ambassadors Roles & Responsibilities – 2/2

- E&C Detection and Prevention
 - Direct people towards the appropriate experts
 - Promote transparency and the Group Alert Procedure
 - Help people to behave ethically and take ethical decisions
 - Provide regular feedback to the E&C team on questions and concerns
- E&C Continuous Improvement
 - Propose and share initiatives that have succeeded
 - Be associated to new E&C projects



Monitoring and support from the Alstom E&C Department

- Coordination through quarterly calls
- Providing standard presentations for E&C Awareness sessions
- E&C Ambassadors Community WIKI web based sharing platform
- Monthly E&C Newsletter with real cases and ethical dilemmas
- Facilitation for preparing E&C Awareness sessions
- Support to help to answer to questions and issues raised
- Sharing E&C Ambassadors return of experience



Alstom E&C Ambassadors – a few achievements after 18 months

- E&C Promotion
 - Publish articles in internal newsletters
 - Ask questions to E&C to provide feedback to the audience afterwards
 - Work with Legal and Sourcing to include an E&C clause in contracts
- E&C Awareness sessions ⇒ 65 sessions and more than 900 attendees
 - Translation of presentations or documents
 - Creation of the real cases scenarios and exercises for the audience
 - Use of the United Nations videos
- E&C Initiatives
 - Create a gift register.
 - Develop a handbook for meeting rooms, containing the main statements of Code of Ethics for relationships with suppliers
 - Use the label "E&C Ambassadors" in e-mails with a link to the E&C Newsletter



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

