

# 2012 COMMUNICATION ON PROGRESS GLOBAL COMPACT



This is our **Communication on Progress** in implementing the principles of the **United Nations Global Compact**.

We welcome feedback on its contents.

Aerospace - Security Systems - Fireworks - Mines - Quarries - Construction - Seismic - Tunneling



high-tech **initiation** company

 **davey bickford**

# Introductory letter



On behalf of **DAVEY BICKFORD Group**, I reaffirm my support to the 10 principles of the UN GLOBAL COMPACT.

More particularly, this year I am pleased to communicate on our global **Anti-Corruption** policy, our **Labour** and **Human Rights** policies and our **Environmental** policy.

In that respect Davey Bickford express its intent to advance these principles within its sphere of influence, and to make a clear statement of its commitment to its stakeholders, its customers and its employees.

**Daniel DEGOVE**

*President*

**DAVEY BICKFORD SMITH SAS**



## ANTI-CORRUPTION

### **DB Group Anti-Corruption Policy**

Daniel DEGOVE, President Davey Bickford Group

### **DB North America Procedure**

Kevin MULLOWNEY, Vice President Davey Bickford North America

*→ Principle 10: Business should work against corruption in all its forms, including extortion and bribery.*

## LABOUR

### **Parité entre les hommes et les femmes** au sein de la société

Michel GAZIANO, Human Resources Director

*→ Principle 6: The elimination of discrimination in respect of employment and occupation.*

## HUMAN RIGHTS

### **Amélioration des conditions de travail** du personnel

Michel GAZIANO, Human Resources Director

*→ Principle 2: make sure that they are not complicit in human rights abuses.*

## ENVIRONMENT

### **Processus de certification environnementale ISO 14001**

Laurent DOUHAISENET, Plant & Industrial Director

*→ Principle 8: undertake initiatives to promote greater environmental responsibility; and*

*→ Principle 9: encourage the development and diffusion of environmentally friendly technologies.*

- ANTI-CORRUPTION
- LABOUR
- HUMAN RIGHTS
- ENVIRONMENT

## ANTI-CORRUPTION

**Principle 10:** Business should work against corruption in all its forms, including extortion and bribery.

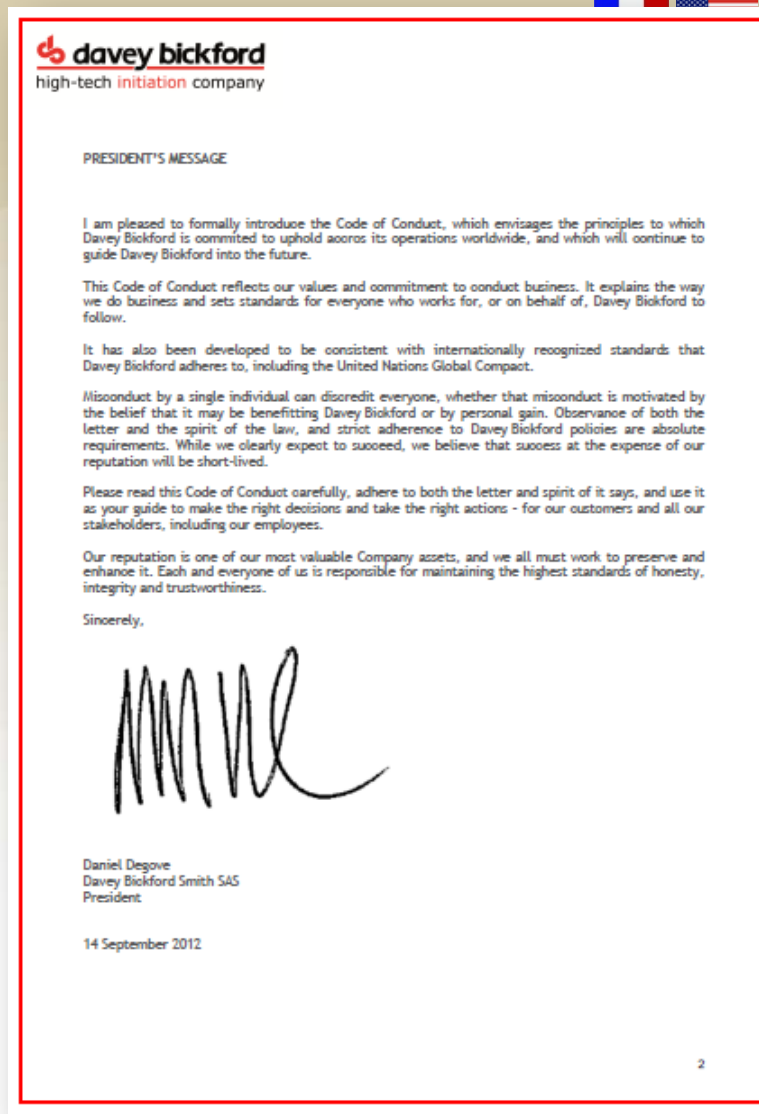
# DB Group Anti-Corruption Policy

In September 2012 DAVEY BICKFORD reviewed and definitely fixed its global anti corruption policy.

Going forward this policy has been confirmed in all branches of the Group for immediate enforcement.

Here attached:

- The President communication dated Sept. 14<sup>th</sup> 2012 on this policy.
- The North American branch related internal procedure.



# DBNA Anti-Corruption Strategy



**DAVEY BICKFORD North America**, headquartered in Salt Lake City, Utah is pleased to confirm that we support Principle 10 of the UN Global Compact with respect to Anti-Corruption and the leadership required to create the value system and culture supporting the principle.

With this commitment, we express our intent to advance these principles within our sphere of influence, and make a clear statement of this commitment to our stakeholders and our customers. We also pledge to take part in the activities of the UN Global Compact where appropriate and feasible. Today, we are engaging in complete employee training that encompasses the doctrines of the UN Global Compact Principle 10 and through this, implementation of the Principle, monitoring and adherence to the Principle, and later, auditing of the effectiveness in the North American infrastructure.

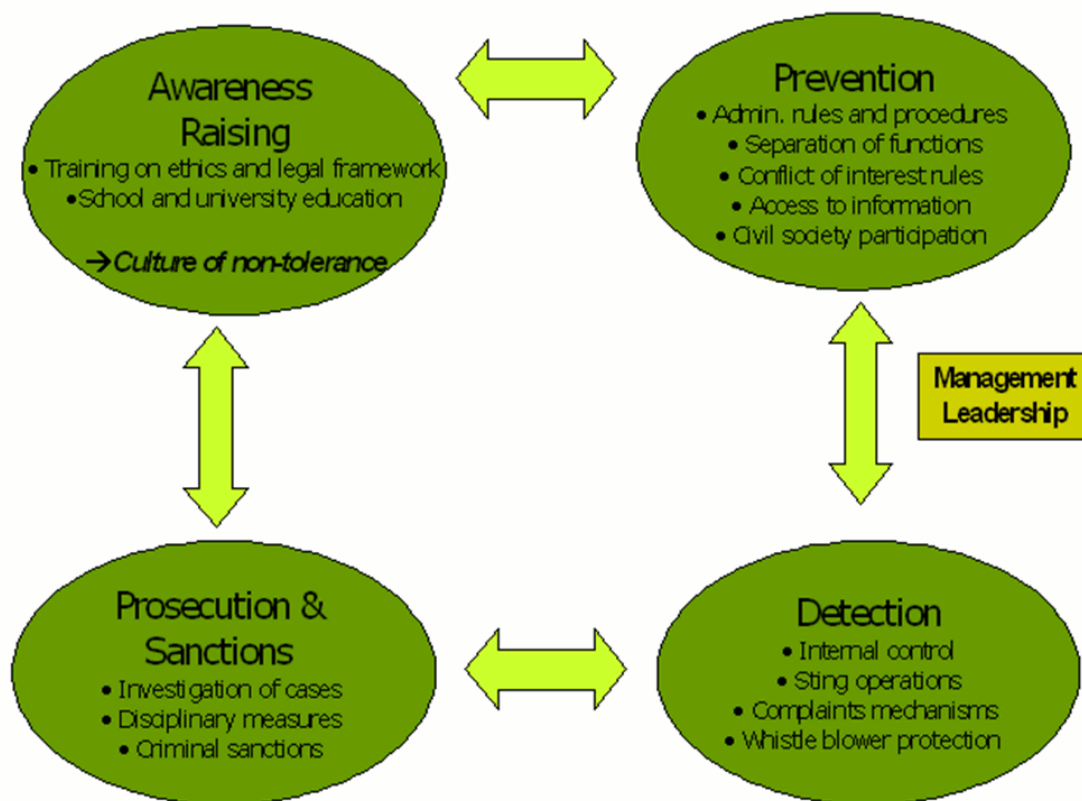
Contained in this document can be found, 1) Our overall strategy, 2) Our current policies in force and, 3) Our 2012 and 2013 Compliance Training program plan.

Sincerely yours,

**Kevin M. MULLOWNEY**  
*Vice President, Sales & Business Development*  
**DAVEY BICKFORD North America**



## Elements of Anti-Corruption Strategy



Sources

De Graaf, G. (2007) CAUSES OF CORRUPTION: TOWARDS A CONTEXTUAL THEORY OF CORRUPTION, PAQ SPRING





## DAVEY BICKFORD North America Employee Handbook

- All employees receive at time of hire
- Revised handbooks issued to ALL employees as amended
- Complete document is available upon request as well as DAVEY BICKFORD corporate Code of Conduct.

Types of behavior and conduct that the Company considers inappropriate include, but are not limited to, the following:

- Falsifying employment or other Company records;
- Violating the Company's Anti-Harassment Policy;
- Violating state, federal or local laws and regulations;
- Violating security or safety rules or failing to observe safety rules or the Company safety practices; failing to wear required safety equipment; tampering with the Company's equipment or safety equipment;
- Soliciting gratuities from customers or clients;
- Exhibiting excessive or unexcused absenteeism or tardiness;
- Possessing firearms, weapons or explosives on Company property without authorization, in violation of Company policy or while on duty;
- Using Company property and supplies, particularly for personal purposes in an excessive, unnecessary or unauthorized way;
- Engaging in criminal conduct or acts of violence, or making threats of violence toward anyone on Company premises or when representing the Company; fighting or provoking a fight on Company property, or negligent damage of property;
- Reporting to work under the influence of drugs or alcohol, and/or illegally





- 🔗 **DAVEY BICKFORD North America Employment offers contain section 1.6**
- 🔗 **All potential employees receive at time of recruitment**
- 🔗 **Signature by new employee REQUIRED as a condition for hire**
- 🔗 **Complete document is available upon request as well as DAVEY BICKFORD corporate Code of Conduct.**

**NOW, THEREFORE, THE PARTIES AGREE AS FOLLOWS:**

**1. Duties**

- 1.1.** DW will be employed as Business Development Manager, Western U.S. / Canada for DBUSA.
- 1.2.** DW's main duties include, but are not limited to, the following: acquire a strong technical knowledge of DBUSA products; provide incremental growth to DBUSA revenue and margin streams, assist customer implementation of DBUSA products in a safe manner and in compliance with all state and federal laws and regulations; classroom and field training; customer follow-up; monthly written report to management; for the purposes of significantly promoting and increasing the sale of DBUSA products.
- 1.3.** DW will report to the Sr. Business Development Manager, Western U.S. / Canada, and perform such duties as are assigned to him.
- 1.4.** DW shall devote his full time and effort to the duties assigned to him in accordance with this agreement and he shall not accept any other employment while this agreement is in effect, whether in conflict with the terms of this agreement or not.
- 1.5.** DW shall keep DBUSA fully advised as to all matters relating to the use of DBUSA products by its customers and any other information that may be useful to DBUSA.
- 1.6.** DW shall not solicit or accept payment or benefit in money or kind from any Party outside DBUSA as an inducement or reward for an act or omission, or in connection with his employment or in connection with any DBUSA matter or business transacted by or on behalf of DBUSA.



🔧 **DAVEY BICKFORD North America implementing training in 2012**

🔧 **All employees will be required to complete the training**

🔧 **Training provided by WeComply**

[www.WeComply.com](http://www.WeComply.com)

🔧 **Web-based training**

🔧 **Flexible content based on the needs of the organization**

🔧 **Why this training for the company?**

- It's the LAW
- Prevents and Detects Improper Conduct
- Defenses to Liability, if needed
- Mitigates Federal Sentencing Guidelines

🔧 **Why this training for employees?**

- It Helps Them Understand and Follow the Law
- It Fosters Trust and Loyalty
- It Supports a Culture of Integrity

🔧 **Course plan for 2012 →**





## Mandatory Courses 2012 / 2013

### 2012:

#### Ethics and Compliance Essentials

This course is, in essence, a "Code of Conduct Training" course for organizations that do not have a formalized Code of Conduct. It covers all of the most important legal/ethical/compliance principles that organizations face — including conflicts of interest, information security, electronic communications, anti-competitive conduct, alcohol and drug abuse, and many others — but without reference to a Code.

#### Global Anti-Corruption

This course explains the central principles of the major anti-corruption laws and conventions, including the U.S. Foreign Corrupt Practices Act, the new UK Bribery Act and others. It provides detailed guidelines, FAQs and alerts for employees in marketing, sales, operations, business development and finance to ensure that they will recognize and respond appropriately to corrupt activities and practices wherever they conduct business.

#### Antitrust Essentials

This course describes (1) the basic legal principles of antitrust and the antitrust-related problems that can occur in the real world when dealing with colleagues, customers, suppliers, competitors and others, and (2) civil and criminal antitrust penalties and the importance of compliance. The course is intended to help employees recognize "red flags" — situations that present a risk of antitrust violations and legal liability — and deal with them appropriately and legitimately.

### 2013:

#### Business Gifts and Courtesies

This course teaches employees what they need to know about giving and receiving gifts, entertainment and other courtesies in the business context. It explains which business gifts and courtesies are appropriate and which are inappropriate, as well as how to handle questionable situations.

#### Conflicts of Interest

This course describes the most common workplace conflict-of-interest situations and the circumstances in which they arise. It is intended to train employees of all types of organizations to learn to recognize and avoid conflicts of interest, particularly with regard to handling personal, financial and family interests, dealing with customers and suppliers, and handling offers of gifts and entertainment.

#### Fraud Detection and Awareness

This course describes the most common types of fraud used to divert money from business organizations. The course helps employees (1) gain an awareness of corporate fraud so that it may be detected and prevented or minimized, and (2) understand their responsibility to comply with the law and report misconduct.

#### Travel and Expense Reimbursement

This course guides employees in making prudent financial decisions in arranging for business travel and incurring other business-related expenses. It explains which costs, charges and travel arrangements are reasonable and which are unreasonable as well as how to avoid incurring unnecessary expenses for which employers will not provide reimbursement.

- ANTI-CORRUPTION
- **LABOUR**
- HUMAN RIGHTS
- ENVIRONMENT

## **LABOUR**

**Principle 6:** The elimination of discrimination in respect of employment and occupation.

# Parité entre les hommes et les femmes



- 6 Un accord a été mis en place au sein de la société et entre en vigueur à compter du 1er janvier 2012. Cet accord a une durée déterminée de 3 ans.
- 6 Une commission de suivi est mise en place, composée de représentants de la direction, membres de la commission « Egalité Hommes/Femmes », des représentants des salariés. Celle-ci se réunira au moins une fois par an et sera chargée d'examiner le bilan intermédiaire des réalisations du présent accord.





## Les trois domaines d'actions relatifs à la parité entre hommes et femmes:

### 1) Accès à la formation professionnelle

Action 1 : Renforcer l'accès à la formation pour les femmes pour toutes les catégories socioprofessionnelles

Action 2 : Faciliter l'accès à la formation à l'initiative du salarié en utilisant les dispositifs tels que DIF, CIF et autres. Un catalogue des formations diffusable via le DIF (non limitatif) sera proposé en 2012.

### 2) Accès à des évolutions de qualification

Action : Augmenter la qualification des salariés en veillant à un équilibre Hommes /Femmes de ces promotions

### 3) La rémunération

Action : Viser à équilibrer les rémunérations au travers d'actions de qualification du personnel et par le biais d'ajustements quand nécessaire pour la population Homme ou Femme en fonction des problématiques identifiées.



➔ Dans chaque domaine d'action, l'objectif de 2012 est de réduire l'écart entre les hommes et les femmes de 10%.

- ANTI-CORRUPTION
- LABOUR
- HUMAN RIGHTS
- ENVIRONMENT

## HUMAN RIGHTS

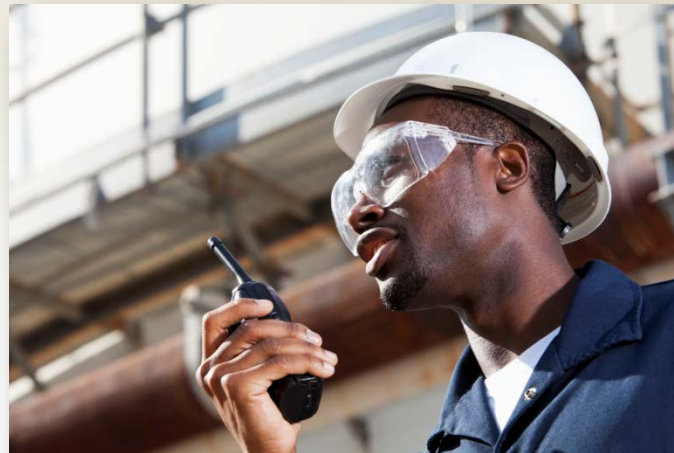
**Principle 2:** make sure that they are not complicit in human rights abuses.



# Amélioration des conditions de travail



- Un accord a été aussi mis en place pour améliorer les conditions de travail du personnel. Il est entré en vigueur depuis le 1<sup>er</sup> Janvier 2012 pour une durée déterminée de 3 ans à compter de la signature.
- Une Commission de Suivi est mise en place, elle sera composée de représentants de Direction, groupe de travail de pénibilité et de représentants des salariés. La Commission se réunira semestriellement et sera chargée d'examiner le bilan intermédiaire des réalisations de cet accord.





## Les quatre domaines d'actions de la prévention de la pénibilité:

### 1. L'adaptation et l'aménagement de postes de travail

Plan d'actions relatif à la **réduction de l'exposition à la manutention manuelle de charges**:

Action 1 : sensibiliser à la réduction de la manutention manuelle de charges par des formations à l'ergonomie les personnes susceptibles d'intervenir sur l'adaptation et l'aménagement des postes de travail.

Action 2 : réaliser les études de poste approfondies sur les 12 postes exposés à la manutention manuelle de charges.

Action 3 : mettre en œuvre les améliorations préconisées par les études de poste.

Plan d'actions relatif à la **réduction de l'exposition au bruit**

Action 1 : effectuer la cartographie des postes pour lesquels les résultats aux mesures de bruit réalisées par le sonomètre de l'entreprise sont égales à 85 dB.

Action 2 : réaliser des études de poste approfondies suite aux cartographies de bruit.

Action 3 : mettre en œuvre les préconisations proposées par les études de poste.



## 2. le développement des compétences et des qualifications

Action 1 : augmenter la qualification des salariés pour permettre une répartition du temps de travail sur différentes affectations et ainsi réduire l'exposition à des postes à critères de pénibilité.

Action 2 : Formation gestes & postures pour les salariés affectés au poste de manutention.

## 3. l'aménagement des fins de carrière

Action 1 : Mener les entretiens de seconde partie de carrière.

## 4. le maintien en activité en cas d'arrêt

Action 1 : Pour les cas d'inaptitude nécessitant l'aménagement d'un poste de travail ou le reclassement d'un salarié à un poste différent du poste initial d'affectation, le recours à une aide externe (AIST, CARSAT, ARACT, SAMETH) sera mis en œuvre.

Action 2 : Mettre en œuvre des visites de pré-reprise pour les cas d'absence supérieure à 1 mois (avec l'accord du salarié).

➔ Un plan d'action détaillé est élaboré et 100% des actions planifiées sur 2012 seront réalisées.

- ANTI-CORRUPTION
- LABOUR
- HUMAN RIGHTS
- ENVIRONMENT

## ENVIRONMENT


**Principle 8:** undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

# Certification environnementale ISO 14001

## Démarche de certification environnementale ISO 14001 du site d'Héry. Extrait de communication internes:





3

Bulletin n° 4

**ENVIRONNEMENT**  
**PROJET DE CERTIFICATION ISO 14 001**

DEMARCHE PAR ETAPE : 1 – 2 - 3

## CONFIRMATION DES CONCLUSIONS

rendues lors  
de l'audit du niveau 1  
du 20 et 21 juin 2012.

**Nous venons de recevoir le certificat  
AFNOR pour le niveau 1  
attestant la conformité.**

En route pour l'étape 2 (début janvier 2013).

L'Environnement vous remercie pour votre collaboration active.

Emilie BESANCON ☎ 3050 Sylvie DEAU ☎ 3046

Copyright © 2011 DAVEY BICKFORD, All rights reserved, Strictly confidential



**ENVIRONNEMENT  
CERTIFICATION ISO 14001**

☛ Pour répondre à la demande de plusieurs clients, la Direction a pris la décision d'engager une demande de certification Environnement ISO 14001 pour le site.

☛ 3 étapes sont nécessaires pour mener à bien cette certification :

- Etape 1 Etat des lieux et identification des actions prioritaires (avril / mai 2012).
- Etape 2 Etablissement d'un programme environnemental (fin 2012).
- Etape 3 Formalisation d'un système de management environnemental (juin 2013).

• Chaque étape fera l'objet d'un audit et d'une certification.

☛ Constitution d'un groupe PROJET

- BESANCON Emilie
- BLONDEAU Pascal
- CHARLES Clélio
- DEAU Sylvie
- GAUTREAU Séverine
- VIEILLARD Claire



☛ Des bulletins seront régulièrement diffusés afin de vous permettre de suivre le déroulement de ce projet.

 high-tech initiation company

Copyright © 2011 DAVEY BICKFORD, All rights reserved, Strictly confidential

DIRECTION/NS – 27 janvier 2012

### ENVIRONNEMENT

**Principe 8:** undertake initiatives to promote greater environmental responsibility; and

**Principe 9:** encourage the development and diffusion of environmentally friendly technologies.