

## COMMUNICATION ON PROGRESS



## MESSAGE FROM CHIEF EXECUTIVE OFFICER

The ARaymond network links together more than 5000 colleagues in 24 countries in 2012.

The aim of our enterprise through our expertise and the engagement of our talents is to generate value and sense for the society, for our employees, for our customer and as a consequence for our family partners.

The sense we need to generate for our employees relies on our capacity to be consistent with our values on the long run in our actions.

All new buildings we have launched and erected in 2012 are all compliant with the LEED certification.

We also have successfully achieved in Germany, our largest subsidiary by far, the ISO 50001 certification.

We increased our support to Tree-Nation funding the installation of a micro-irrigation system, the digging of two wells and the purchasing of six additional photovoltaic panels to sustain plantations of moringas in Niger.

We performed in Brazil the IX SIPAT 2012 around the topic "Sustainability and Recycling to reduce waste". We received, in Brazil again, the award "Premio Internacional Ambiental Chico Mendes 2012".

We started in France to create a new foundation to search how to improve the well-being and to develop the mindfulness in the enterprises.

We support in France the association "Sport dans la Ville" which works on the insertion of youngsters in into the work world.

We are very proud about all those examples of our engagement of our people and company to contribute to a better world and also very proud to renew our engagement to Global Compact.

A handwritten signature in black ink, consisting of stylized, overlapping loops and strokes, positioned above the printed name.

Antoine RAYMOND

CEO

## TITLE: ARAYMOND ENVIRONMENT-RELATED ACTIONS WORLDWIDE

### GLOBAL COMPACT PRINCIPLES :

#### Principle 7:

Businesses should support a precautionary approach to environmental challenges

#### Principle 8:

Undertake initiatives to promote greater environmental responsibility

#### Principle 9:

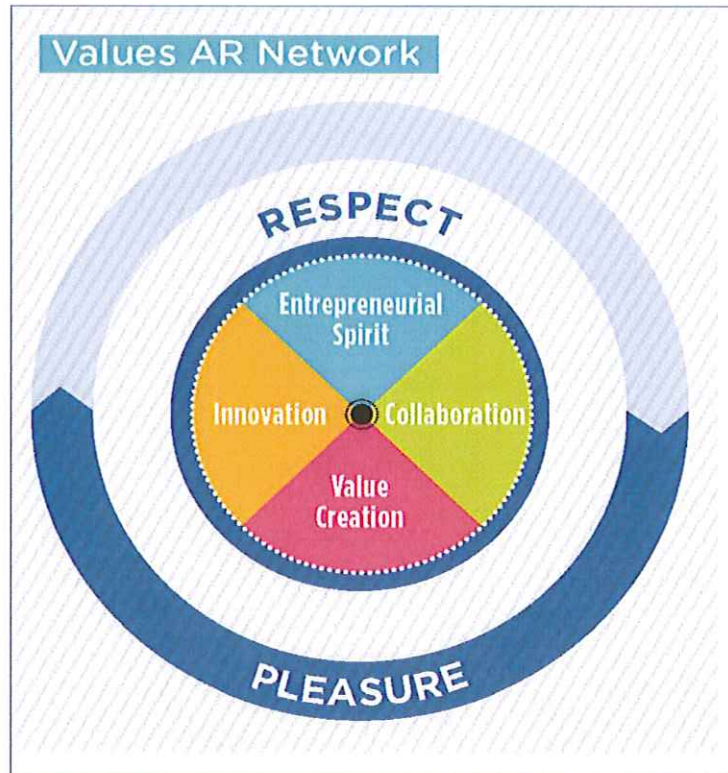
Encourage the development and diffusion of environmentally friendly technologies

### ACTIONS

#### 1 – TELLING PICTURES: PHOTOS OF ARAYMOND VALUES

Last June, ARaymond 15 Environmental Managers met for their second annual worldwide seminar to share best practices, review the follow-up of actions further to the implementation of the Internal Environmental Guidelines and to define common global key process indicators.

In addition, the 15 Environmental Managers chose the best pictures in an international photo contest which was initiated earlier in 2012 to illustrate “the ARaymond Contribution for a Better Environment”, according to ARaymond values below. The jury granted one award per value: Respect, Pleasure, Entrepreneurial Spirit, Value Creation, Collaboration and Innovation.



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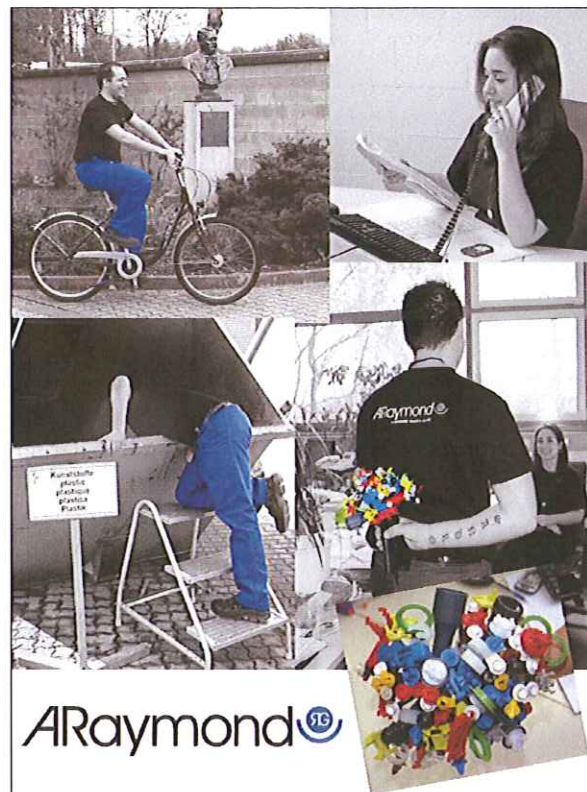
RESULT

**Respect: 1<sup>st</sup> Rank Winner / Germany**





**Pleasure : 1st Rank Winner / Germany**



**Entrepreneurial Spirit: 1<sup>st</sup> Rank Winner / France**



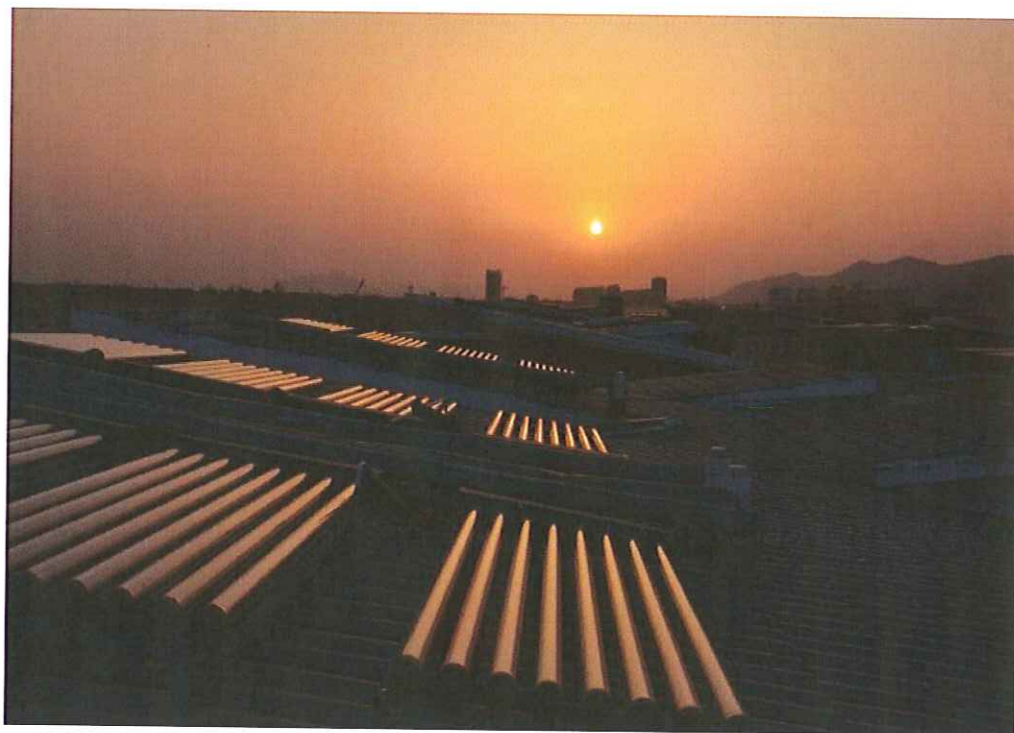
**Value Creation: 1<sup>st</sup> Rank Winner / Spain**



**Collaboration: 1<sup>st</sup> Rank Winner / India**



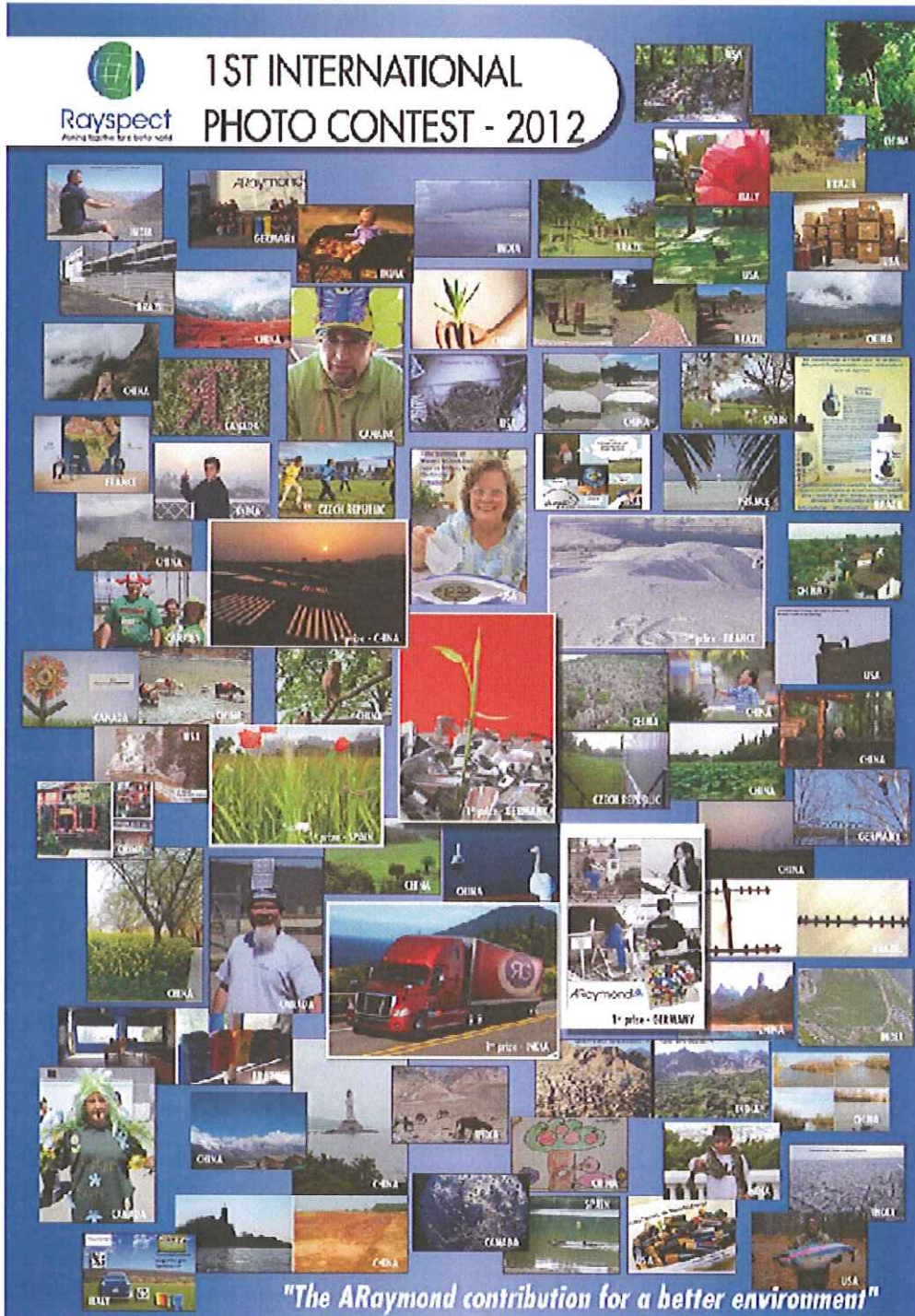
**Innovation : 1st Rank Winner / China**







# 1ST INTERNATIONAL PHOTO CONTEST - 2012



The above posters comprising the 70 photos received for the contest was printed and sent out to each ARaymond location to be displayed in a place where it can be seen by most of the people (canteen, coffee corner, meeting rooms etc).





### Principle 7

Businesses should support a precautionary approach to environmental challenge.

From this year, ARaymond begins a new partnership with Tree Nation in Colombia, always regarding reforestation.

The Pedregosa is a natural reserve located in the province of Vichada, close to the Venezuelan border and near the Orónico river, rich of endemic species.

The plantation was created by a Canadian family in 2007 to promote biodiversity through the preservation of native trees.

At present, there is no electrical network outside of major cities. The reserve uses generators, but this is not enough for life and development of the plantation.

ARaymond Network will thus finance the purchase of two solar panels for the installation of water pumps.

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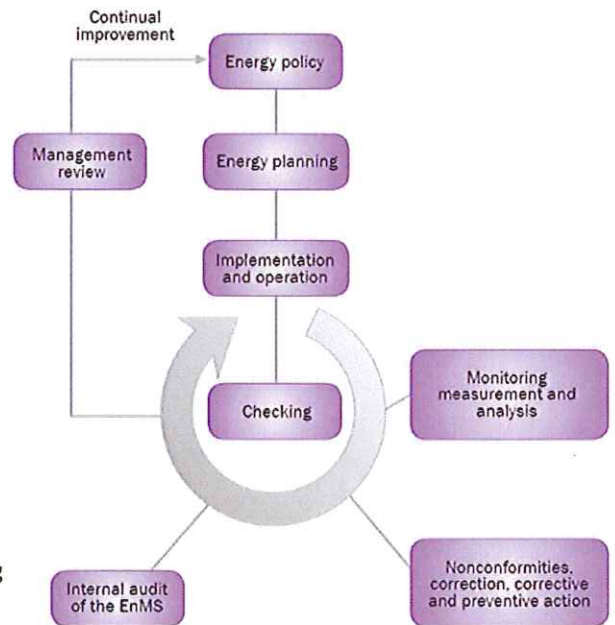
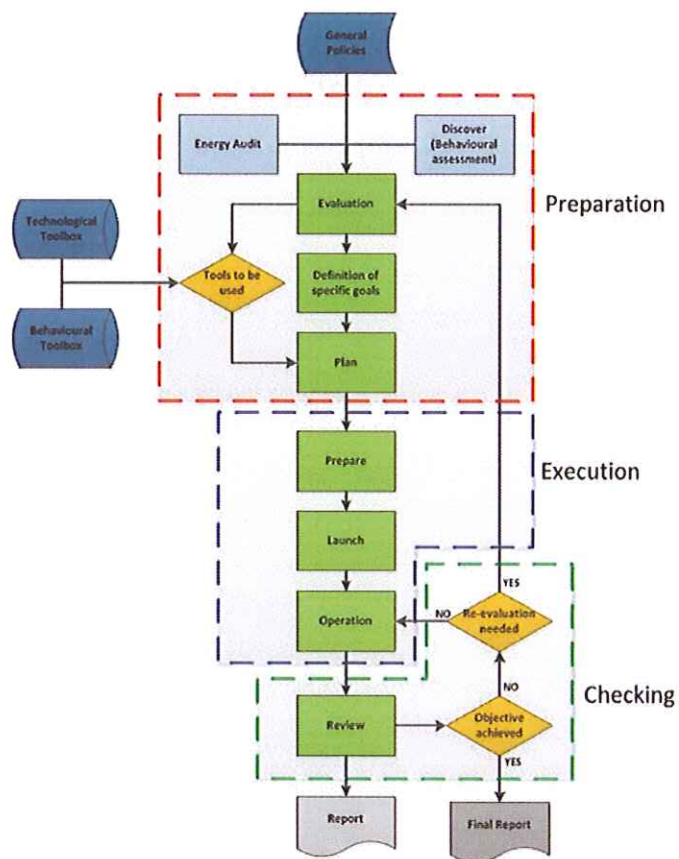
## 3 – ARAYMOND GERMANY SETS THE STANDARD – ISO 50001 CERTIFICATION OBTAINED

The ARaymond Germany plant in Lörrach was granted ISO 50001 certification last October for its Energy Management System (EMS). The goal is to achieve continuous improvement of energy performance, efficiency, security and consumption.

The system is modelled after both the ISO 9001 Quality Management System and the ISO 14001 Environmental Management System. The EMS will use computer-monitored tools to enable operators to drive, control and optimize the performance of the electrical system, and also manage gas and water consumption.

The German EMS-Team is the lead in this Network project.

### **ISO 50001 process**





# CERTIFICATE

Management system as per

**DIN EN ISO 50001:2011**

Evidence of conformity with the above standard(s) has been furnished  
and is certified in accordance with TÜV PROFICERT procedures for

**ARaymond** 

A RAYMOND GmbH & Co. KG

Teichstraße 57

D-79539 Lörrach

with the location

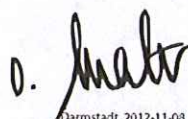
Hegenheimer Straße 22, D-79576 Weil am Rhein

scope

**Production of special fastening systems  
and components**

Certificate registration No. 73 130 1149  
Audit Report No. 4214 9785  
Valid until 2015-11-07  
First certification 2012-11-08



  
Darmstadt, 2012-11-08  
Certification body of TÜV Hessen  
- Head of Certification body -

Page 1 of 1.  
This certification was conducted in accordance with the TÜV PROFICERT auditing and certification procedures and is subject to regular surveillance audits. Verifiable under [www.tuvv-dub.de](http://www.tuvv-dub.de). Original certificates contain a glued on hologram.  
TÜV Technische Überwachung Hessen GmbH, Rüdelsheimerstr. 119, D-64285 Darmstadt, Tel. +49 6151/600331

The information was also widely reported into the local press as can be seen below.

In addition, our Internal Environmental Guidelines (which were subject of our COP last year) served as basis for the project (as can be seen in the article below).



## Unser Energiemanagementsystem

**„Der sorgsame Umgang mit Energie entscheidet langfristig über Erfolg oder Misserfolg eines jeden Unternehmens.“**

Diese Aussage hört sich im ersten Moment sehr pathetisch an, leider trifft sie jedoch zu. Und nicht nur für Unternehmer, rein, auch privat spüren wir die Verteuerung notwendiger Energie immer bewusster. Wer von uns hätte vor 30 Jahren geglaubt, mehr als umgerechnet 3,- DM für der Liter Sprit zahlen zu müssen? Nun tun wir es. Strom und Gas sind von dieser Entwicklung nicht ausgenommen. Jeder von uns hat sein persönliches Modell entwickelt, diese horrenden Preissteigerungen im täglichen Leben auszugleichen.

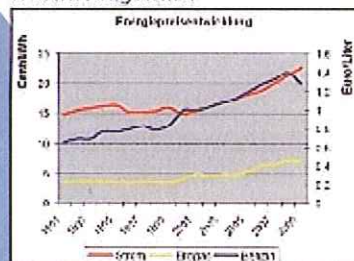


Abb.: Energiepreisentwicklung in Cent/kWh (Gas Strom) und €/Liter (Erdöl); Quelle: Bundesministerium für Wirtschaft und Technologie

Auch für ein gesundes Unternehmen wie ARaymond® wird dies eine der großen Herausforderungen der nächsten Jahre sein - zu immens ist unser Energiebedarf. Energie, die wir dringend benötigen für unsere Produktion.

Hätten Sie geglaubt, dass ARaymond Deutschland jährlich ca. 6 Mio. € für Strom und 1 Mio. € für Gas bezahlt? Tendenz steigend! Seit 1997 haben sich die Stromkosten bei einer 20-prozentigen Mengenerhöhung verdoppelt! Ursachen dafür sind neben den Preiserhöhungen auch die ständig steigenden staatlichen Abgaben und Steuern.

Während jeder von uns sein Energieeinsparmodell im Kopf hat, reicht das in einem so komplexen Unternehmen wie unserem nicht aus. Wir brauchen mehr, um sicherzustellen, dass all die guten Ideen, die über Sie ins Unternehmen gelangen, aufgezeichnet, bewertet, umgesetzt, überprüft und gegebenenfalls korrigiert werden. Ein echtes Managementsystem eben.

Die Grundlage dazu bildet unsere global, das heißt an allen Standorten weit weit getragene, interne Umweltleitlinie. Quasi unser guter Vorsatz.



Abb.: Unsere interne Umweltleitlinie weltweit in der deutschen Übersetzung, unterschrieben von Antoine Raymond und Dirk Hoffmann.

Auf dieser Basis haben wir im Laufe der letzten Monate ein Energiemanagementsystem entwickelt und zum fester Bestandteil unseres unternehmerischen Handelns gemacht. Unsere Ideen werden entweder vom Energiemanagementteam und den Fachabteilungen direkt oder über unser Verbesserungsvorschlagswesen CIS ins Unternehmen getragen. Sie werden bewertet, wenn möglich kurzfristig umgesetzt bzw. in den Maßnahmenplan aufgenommen.



Abb.: Unser abteilungsübergreifendes EMS-Team bei einer der regelmäßigen Besprechungen. V.l.n.r.: Joachim Gertels (ASL), Gabor Gottschaldt (IFM), Jörg Lompscher (CC), Florian Hartmann (GIS), Markus Müller (V&W) und Energiefachkraft, Volker Redwanz (\*M); es fehlt Thomas Löffler (W&C).

Erste deutliche Erfolge konnten bereits erzielt werden, so wurden im Laufe des letzten Jahres durch diverse Beleuchtungsprojekte und die Modernisierung der Kälteanlage TK über 300.000 € an Energiekosten und 1.200 Tonnen CO<sub>2</sub> eingespart. Weitere Projekte sind bereits

in der Umsetzung.

Mittelfristig wird es möglich sein, zeitnah den Verbrauch aller relevanten Anlagen zu erfassen und den künftigen Manufacturing Units zuzuordnen. Ein wichtiger Schritt um die Transparenz zu erhöhen und zusätzliche Einsparpotentiale zu identifizieren.

Es sind jedoch nicht nur die großen Projekte, die uns helfen, sondern die vielen kleinen, mit denen wir alle beitragen können. Ideen und Anregungen dazu finden Sie auch in unserem Trainingsprogramm RaySafe. Es enthält eine Trainingseinheit zum Energiesparen im Unternehmen und Informationen zum Energiemanagement.



Foto: Auszug aus der Trainingseinheit, die enthaltenen Tipps helfen uns auch privat zu sparen.

**Zugang zu RaySafe über das Intranet => Quicklinks -> RaySafe; Anmeldung unter der Personalnummer. Das Kennwort ist bei der ersten Anmeldung ebenfalls Ihre Personalnummer.**

Nur wenn wir alle an „einem Strick ziehen“ wird es uns gelingen unser Unternehmen fit für die Zukunft zu machen. **Machen auch Sie mit!**

**Impressum:**

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**NUR ZUR INTERNEN VERWENDUNG**



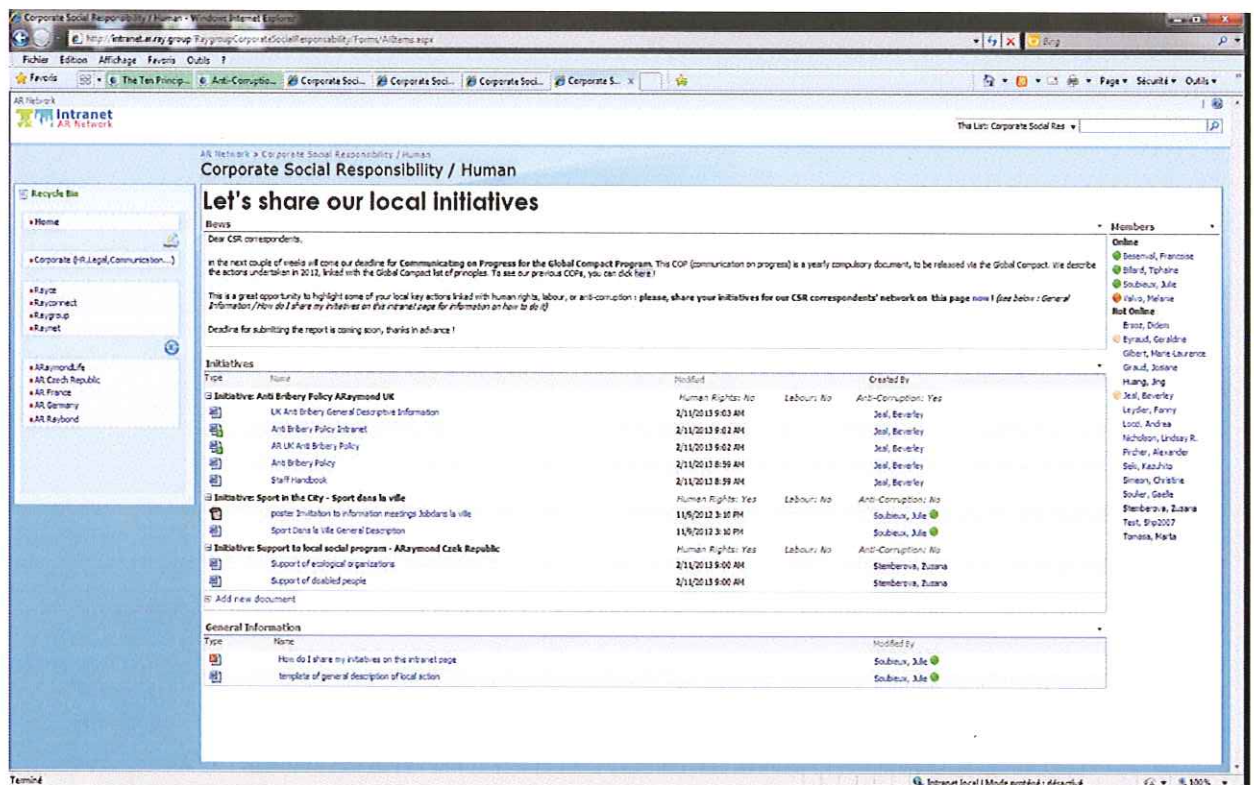
## ARAYMOND HUMAN PRINCIPLES RELATED ACTIONS WORLDWIDE

### SHARING

#### PRACTICAL ACTIONS TO ENHANCE COLLABORATION AND SHARING

The development of actions linked with the “Human” sets of principles (Human Right, Labour, Anti Corruption) is less visible in our network organization, and in our industry in general. For that reason, we put the focus on “sharing” information. Making all involved people aware of what is done / can be done will trigger better knowledge, awareness, and new initiatives.

- ⇒ We now have, for each of our ARaymond companies, a dedicated “Corporate Social Responsibility” correspondent. In his / her country, this person has a developing and coordinating role. In our global network, his main role is to bring inputs to the network. This network of correspondents now has a dedicated intranet page in order to present their local initiatives and to be aware of what others do. Of course, this is a first step and interpersonal discussions are then encouraged to learn more.
- ⇒ In December last year happened the bi-annual Global Management Days, gathering together the management teams of all ARaymond companies worldwide. Each company presented their main local results, news, and key information. A page was dedicated to their Global Compact Actions, which any person part of the management team of an ARaymond company could see. These pages are copied in the “Overview of Actions in our AR Network” section of this document.



1- Intranet page for the CSR correspondents' network

- ⇒ A dedicated article in our internal newspaper “Rayview” will come soon

- ⇒ The new edition of our internal engagement survey will happen soon, the results should be made available by end of 2013. This survey is interesting for two main CSR reasons :
- It is the key moment where we can have a detailed feedback about the engagement of our people and in general how they feel about anything linked with their work, working conditions, trust and confidence in their management, worklife balance...
  - There are questions directly linked with CSR actions

## SUPPORTING ACTIONS IN FAVOUR OF THE LOCAL COMMUNITIES

### GLOBAL COMPACT PRINCIPLES

#### Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights; and

#### Principle 2:

make sure that they are not complicit in human rights abuses

#### Principle 6

the elimination of discrimination in respect of employment and occupation.

### SPORT DANS LA VILLE

Our French companies have started a partnership in 2012 with “Sport dans la Ville”, a local association working, through long-term sports relationships with youngsters from difficult neighborhood, eventually on their professional insertion. In these areas, statistics about unemployment, level of life are poor, and the main objective is to give these youngsters the same chances than others.

“

*Sport dans la Ville was founded in 1998 in Lyon to create a sports program that would help young people from difficult neighborhoods. It has since grown into France's largest non-profit sports organization. Its programs use sport—in particular football—to encourage participants to avoid anti-social behavior and value teamwork, leadership and social integration. The organization focuses on working with young people at an early age to instill the core values that will help them integrate themselves into society and improve their chances of employment.*

”

...



See [http://www.sportdanslaville.com/Presentation\\_a109.html](http://www.sportdanslaville.com/Presentation_a109.html) for more information.



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## ACTIONS

- Commitment from local HRs to be available to lead job searching workshop / job interviews simulations with the youngsters over the year
- Organization, with our volunteer employees, of “tutoring pairs” : an ARaymond employee commits to follow a youngster over the year, supporting him / her in matters of : job searching, professional orientation, leisure and time out of the neighborhood, networking, ...
- Tours in the manufacturing plant and company in general, to discover
- Commitment to a cautious reading of all internship / alternate scheme / job searching applications from Sport Dans la Ville

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## RESULTS :

In January 2013:

- 6 pairs tutor / youngster are created since last fall. We thank again our volunteer employees for this personal involvement !
- Job searching workshop have not been organized but should be, with our contribution, during the Easter period
- A visit of the company is already organized for a group of the association

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## SUPPORT TO INSERTION WORK FOR PRISONERS

In Spain, we outsource some of our work (for instance, assembly work) to prisoners, thanks to a partnership with the prison administration. It allows them to earn an income, and helps them prepare to a social and professional insertion.

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## SUPPORT FOR DISABLED PEOPLE IN CZEK REPUBLIC

Partnerships with local associations exist in various geographical areas where ARaymond is present, and in many cases has been lasting over the years. For instance, ARaymond Czech Republic has started building since 2006 partnership with local associations working with disabled children and people on different aspects (family support, awareness, leisure, personal development, medical rehabilitation through horses ...)

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## PARITARY HEALTH AND SAFETY MANAGEMENT SYSTEM IN RAYCONNECT FRANCE

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## GLOBAL COMPACT PRINCIPLES

### Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights; and

### Principle 2:

make sure that they are not complicit in human rights abuses.

### Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Rayconnect International, a company of the ARaymond Network, implemented recently a new health and safety management system. Although there was in this case no legal constraint to do so, they decided to involve and listen to all stakeholders, including : management team, health and safety expert, employees' representative.

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## ACTIONS

It was decided to launch discussions about health and safety management system involving directly employees' representatives, in order to involve all stakeholders in this priority topic.

Main actions in 2012 :

- Health and safety audits in various departments of the company
- External expert study and works on technical installations
- Training and awareness actions for managers about their own responsibility as managers regarding safety
- Improvement of working conditions

---

## RESULTS

A new health and safety policy is published; all employees have received an information and awareness action on this matter now defined as strategic for the company.

Thanks to prevention actions, there was no work accident (with consecutive absence) in 2012.

New KPIs are followed on a regular basis by the health and safety committee, based upon 6 priorities:

- Manage this system with a continuous improvement objective
- Abide by the statutory requirements
- Define and communicate safety rules
- Investigation and corrective actions
- Prevent risk situations
- Dedicate a specific budget for health and safety

All these actions are now under the full responsibility of the health and safety committee, involving the employees' representatives, the management team, and the health and safety expert.

## POLITIQUE SANTÉ SÉCURITÉ RAYCONNECT INTERNATIONAL



La réussite et la pérennité de Rayconnect France reposent sur des valeurs fondamentales :  
 ► le bien-être, l'engagement, le respect, la santé et la sécurité des personnes

Dans le cadre de son plan stratégique, la Direction confirme la sécurité comme un enjeu stratégique.

A ce titre, elle s'engage clairement et publiquement dans une démarche visant à prévenir les maladies professionnelles, assurer la sécurité totale dans l'entreprise et tendre vers le zéro accident

La politique sécurité est basée sur:

- l'écoute de tous les acteurs du système
- la prévention des risques mettant en danger les salariés, l'entreprise et ses partenaires,
- une démarche d'amélioration continue
- une formation permanente

Elle s'applique à tous:

- Chacun d'entre nous doit être soucieux de sa santé et maître de sa sécurité et de celle des autres.

Nous tous, de la direction à l'encadrement sommes responsables, dans notre environnement de travail, de la santé et de la sécurité des personnes qui nous sont confiées.

La Direction s'engage à :

- Construire et faire vivre un système de management de la sécurité performant,
- Respecter les exigences légales et réglementaires,
- Définir des règles de sécurité dans l'entreprise et les communiquer à toutes les parties intéressées
- Répondre dans les plus brefs délais aux problèmes posés
- Réduire les facteurs accidentogènes
- Une obligation de moyens dédiés à la santé et la sécurité



RAYCONNECT INTERNATIONAL SASU

Rayconnect®  
 FLUID CONNECTIONS

2 - synthesis about health and safety management system at Rayconnect France

## CARE FOR ETHICS / ANTI BRIBERY POLICY AT ARAYMOND UK

### GLOBAL COMPACT PRINCIPLES

#### Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery.

#### ACTIONS :

Fight against bribery and ethics in general are very important concern of ours. In the context of a change in legislation, ARaymond UK recently worked on an anti-bribery policy.

#### Definition of 'bribery'

"The intention to obtain or retain business for the organisation, or to obtain or retain an advantage in the conduct of business for the organisation." (extract from legal Act)

#### How does this affect employees?



It does not stop employees from giving or receiving low value promotional gifts (under £25) i.e. calendars, diaries, chocolates etc, or from offering hospitality/gifts to customers as a "thank you" for their custom and loyalty, i.e. event tickets, business lunches and meals.

However, gifts of over £25 may not be accepted without approval. Any gifts refused because of the value, must be reported to the Company.

In general, an anti-bribery policy is now needed to state clearly how the company and employees should act and behave.

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## RESULTS

1 A risk assessment was carried out within the framework of the Act. Different classes of employees were assessed.

2 This policy has been communicated to all employees to make sure they are aware of their responsibilities in relation to the Act and take note of the reporting requirements. The 'Staff Handbook' has also been updated.

The policy is attached as an appendix to this COP.

## OVERVIEW OF ACTIONS IN OUR AR NETWORK

### China

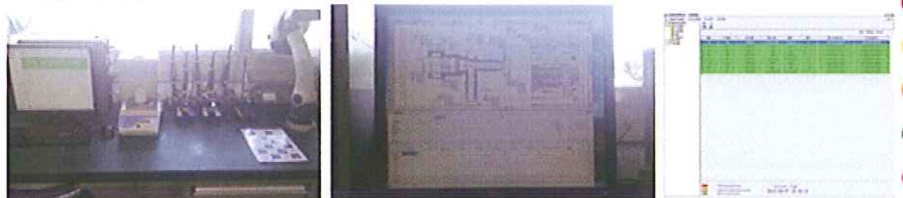
## Our Contribution to Global Compact

ARAYMOND China organized Mini family marathon activity on the Environment day.



## Our Contribution to Global Compact

We start a quality software to record the quality control of the operators during the production.  
Control tool link to computer.  
No anymore paper record.



## Brazil

### Premio: Chico Mendes Award 2012

São Paulo, 26, November, 2012



A.Raymond Brasil Ltda. was honored with the award "Premio Internacional Socio Ambiental Chico Mendes 2012".

Since 8 years the Chico Mendes Institute recognizes companies like ARaymond for its exemplary solutions for the conflict between the development and the social and environmental balance.



The Institute focus in its activity the promotion of the social wellbeing as well as the respect for the environment. It's part of the institute's mission to promote actions respecting the criteria's: solvability, creativity, efficiency, repeatability; The Chico Mendes Institute is supported by United Nation's Global Compact.

## Our Contribution to Global Compact

### LEED silver



2012 GLOBAL MANAGEMENT DAYS

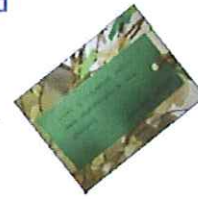
ARaymond



## 'The Desire Tree'

To emotionally attach and involve all employees we invited them to post "their personal wish or action for the environment" on the trees leaves.

The tree we maintained in our reception area for the rest of the year to remember us daily, as well as promote our action to all visitors, to inspire them to follow us.



## Czech Republic

### Our Contribution to Global Compact

- Social responsibility
  - Support of local social programs
- Nature protection
  - Green area in the middle of the new plant
  - Support of local environmental organisations
  - Planting of trees in Jizera mountains
  - Feeding birds in the area of the plant ☺



2012 GLOBAL MANAGEMENT DAYS

ARaymond

## Germany

### Our Contribution to Global Compact

Ecological compensation area (trees to be planted)



ECOfit

Energy saving  
before after



Optimization of  
lighting in several  
shops.  
Saving:  
370,8 t CO<sub>2</sub>/year



2 e-smarts  
for transport of  
people between  
Lörrach and Weil  
plants.  
Saving:  
2,4 t CO<sub>2</sub>/year

Upgrading of  
cooling system



Saving:  
807 t CO<sub>2</sub>/year



2012 GLOBAL MANAGEMENT DAYS

ARaymond®

## India

### Our Contribution to Global Compact

#### Slogan competition

- ▶ We received total 84 slogans from 43 employees (Good participation by operators)
- ▶ Best suggestion awarded with certificate & a gift by our Global HR manager Ms. Geraldine



#### Best Slogan

Himalaya is melting. Sea level is rising;  
Trees are disappearing, temperature is rising;  
For what you are thinking, wake up its "global warming"

Save green earth;  
to make your child's life "a bit worth"



2012 GLOBAL MANAGEMENT DAYS

ARaymond®

## Italy

### Our Contribution to Global Compact

Review of ARaymond Italy Safety Policy. Target: 0 accidents.

Energy saving - Injection machines, tests for electrical energy consumption reduction after installation of thermal insulation blanket.

Celebration of the World Environment Day on 5th June 2012.  
Theme: "Green Economy: does it include you?"



2012 GLOBAL MANAGEMENT DAYS



ARaymond

## Japan/Korea

### Our Contribution to Global Compact

- A. Raymond Japan
  - Create Workplace Environment for Energy saving



The LED Lighting in Production Area

- Reduce QC Component Parts for Environmental friendly



QC with bonded O-ring

- A. Raymond Korea
  - Preoccupancy for the Future Trend to the Green Car



2012 GLOBAL MANAGEMENT DAYS

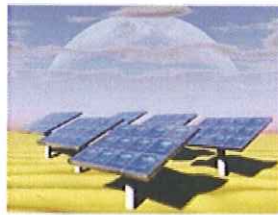
ARaymond



## Rayconnect Europe

### Our Contribution to Global Compact

- QC Material switch to PA610 which is 70% bio-based
- Implementation of new Health, Security and Safety Policy
- Dedicated R&D resource for Eco-design & Bio-sourced studies



2012 GLOBAL MANAGEMENT DAYS

Rayconnect 

ARaymond 

## Spain

### Our Contribution to Global Compact

- Ergonomy improvement program
- Extensive usage of recycled material
- Biodegradable product range
- Explicit energy saving program and monitoring
- Support labour insertion prisoners
- Ethical behaviour in unfair Raygreen competitive environments



2012 GLOBAL MANAGEMENT DAYS

ARaymond 

## North America (ART Industrial)

### Our Contribution to Global Compact

- Active recycling programs exist on the following items:
  - Plastic bottles and plastic bags
  - Aluminum cans
  - White paper
  - Cardboard boxes
  - Wood spacers for steel coils
  - Household batteries
- Recycled over 1,700 lbs. of computer/electronic equipment to a processor who abides by a "No Landfill Policy" on all recycled equipment.
- Installed hand blowers in all facility restrooms - removed paper towels.
- Installed a 10'x14' Gazebo/"Green Area" for employee use at lunch and break times.
- Celebrated Earth Day with the planting of 25 Pine and Maple trees on the facilities grounds.



2012 GLOBAL MANAGEMENT DAYS

ARaymond®

## ARaymond Life

### Our Contribution to Global Compact

✓ KPIs set up for Saint-Egrève plant :  
energy, waste and water consumption



Product development for environment care  
**APIRAY** (Bees collapse disorder)

✓ Human resources recruitment policy based  
on diversity and equality between  
men (40%) & women (60%)



2012 GLOBAL MANAGEMENT DAYS



ARaymond®

## KEYWORDS AND CONTACT

### COUNTRY

Worldwide

### KEY WORDS

International Photo Contest – Tree Nation – ISO 50001

Partnership with local associations – anti bribery

### CONTACT

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### LINKS

<http://www.araymond.com/group/en/network.aspx>



## **A Raymond Ltd Anti-Bribery Policy**

### **Introduction**

This Company is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the Company's policy to conduct all aspects of its business in an honest and ethical manner at all times.

This policy applies to all individuals working for the Company, including anyone providing services to the Company such as consultants, or contractors.

### **Policy Aim**

The aim of this policy is to help the Company act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery.

### **The Law**

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Company is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

### **Policy Statement**

This policy applies to all permanent and fixed-term staff employed by the Company, and any contractors, consultants or other persons acting under or on behalf of the Company.

The company will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, "kickbacks" of any kind.

The Company will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

### **Employee Responsibility**

Employees must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.

### **Gifts and Hospitality**

This policy does not prohibit giving and receiving promotional gifts of low value, or normal and appropriate hospitality.

Receiving Business gifts:

- Receiving promotional gifts of low value is normal and appropriate, however, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to The Company.

Offering Business gifts:

- Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.

Receiving Hospitality:

The acceptance of corporate hospitality must be transparent; all invitations must be reported to the company before an employee accepts any invitation. The following areas are exempt while attending conferences, seminars, sponsored by third parties.

- business and travel expenses incurred
- normal business lunches and meals

Offering gifts and hospitality:

- Company hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have approval.

Donations to organisations:

- No donations should be made to charities, political parties or other organisations without approval.

### **Non Compliance**

### **Staff**

Failing to observe Company policy may lead to disciplinary action in accordance with the Company's Disciplinary Policy.

### **Visitors**

In the event of a breach of the policy by other organisations, or individuals, the Company will take appropriate action.

### **Monitoring Policy**

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The following will be monitored:

- That all individuals working for the Company are advised of the policy.
- Assessment of any reported incident or related occurrence.

Monitoring of the policy is essential to assess how effective the Company has been to establish control of its obligations.

### **Definitions**

**Bribe** is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or, with the intention of influencing them in the performance of their duties.

**Hospitality** is the practice of being hospitable, this includes the reception and entertainment of guests / visitors.

**Kickbacks** or facilitation payments are typically small payments made in return for a business favour or advantage.

### **Reviewing Policy**

This policy will be reviewed and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review.

### **Policy Amendments**

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company senior management to see that all relevant employees receive notice. Written notice and/or training should be considered.