



Communication on progress 2016 ALTEN

United Nations Global Compact Advanced Level











Letter from the Chairman and Chief Executive Officer Simon Azoulay



"Our international development and our leading position in the Engineering and Technology Consulting market give us a responsibility to all our stakeholders, be they employees, employee representative bodies, customers, shareholders, suppliers or partners.

In order to meet stakeholders' requirements, anticipate their needs and build lasting and trusting relationships with them, in recent years our Group has made sustainable development central to its growth strategy. ALTEN sees this approach as central to its commitment in layour of people and sustainable innovation.

Initiated in 2010 with the signing of the United Nations Global Compact, our commitment has been unceasingly expanded and strengthened since then. The internationalisation of our markets, swift change in technology and the growing demands of society in terms of responsibility have prompted us to take action.

Our corporate culture is shaped by core values shared by all of our employees, namely the development of human capital, engineering culture and the quest for profitable and sustainable growth. In 2015, ALTEN reaffirmed this approach by updating and reinforcing our key founding documents. We have also identified our stakeholders' expectations and the challenges inherent to our industry as accurately as possible. We are restructuring our sustainable growth strategy, in line with these fundamental and guiding principles, based on the following priorities:

A career-accelerating employer, by promoting talent, skills development, career and mobility management, security and the personal development of our employees. An innovation catalyst, through the support given to our customers, employees and students in developing sustainable innovative solutions.

A responsible partner, uncompromising on fundamental issues related to information security, business ethics or respect for the environment.

In 2016, we will continue to rise to new challenges. As Chairman and Chief Executive Officer of ALTEN, I affirm my commitment to continuing the implementation of this approach in the Group's various host countries in order to capitalise on individual initiatives, and to share our common values.

More than ever, we want to drive forward our sustainable development approach, measure our progress, submit to assessments and ensure we take a critical look at ourselves, to continually improve our practices in complete transparency.

I am confident that ALTEN's employees will take an active part in this process."

Simon Azoulay, Chairman and Chief Executive Officer









Introduction

The Alten CSR approach is based on three founding documents, including the United Nations' universal principles of the Global Compact, these are broadcasted internally and externally.

ALTEN has set in 2011 a Business Ethics and Compliance charter formalizing the Group's commitments to exercise and develop its activities in strict compliance with national and international laws and regulations.

The Group wishes to conduct its business with integrity and loyalty, which indicates that each employee regularly refers to this Code of Ethics.

It is broadcast on the company's intranet and is included in the handbook given to each new employee.



ALTEN Group wishes to meet the expectations of all its stakeholders, anticipate their requirements, and reconcile performance and responsibility.

ALTEN Group undertakes to do so and observes:

- the 10 principles of the United Nations Global Compact;
 the United Nations Universal Declaration of Human Rights;
- the various International Labour Organization treaties;
- the guiding principles of the OECD applicable to multinationals

The updating of the Ethics & Compliance Charter makes it possible to reaffirm ALTEN Group's fundamental convictions and ethics. It describes the principles that must guide the actions and conduct of every employee in all circumstances and in all countries.

The Alten's Sustainability Charter engages the Group and its subsidiaries to respect and ensure respect in their sphere of influence, the principles of the International Labour Organization and the Global Compact, in particular regarding the fight against discrimination, fight against forced labor and child labor.

The Sustainable Development Charter is available online on the Group intranet, and is included in the welcome booklet given to each new employee.

Alten has reinforced its responsible purchasing policy in 2011, by the creation of the Charter of Responsible Purchasing, updated in 2015. This charter is systematically integrated in the tender; it is sent to the main suppliers for signature.

Through this document, Alten invites its suppliers and subcontractors to comply with social provisions, societal and environmental Global Compact and the International Labour Organization.













SUMMARY

Since 2014, Communications on ALTEN Progress obtain the level of differentiation "Advanced".

This award honors companies that deal in communicating the 21 criteria listed below, and describe for each of them, at least a good practice.

IMPLEMENTING THE TEN PRINCIPLES

CRITERION 1: The COP describes mainstreaming into corporate functions and business units

CRITERION 2: The COP describes value chain implementation

ROBUST HUMAN RIGHTS MANAGEMENT POLICIES & PROCEDURES

CRITERION 3: The COP describes robust commitments, strategies or policies in the area of human rights **CRITERION 4**: The COP describes effective management systems to integrate the Human Rights principles **CRITERION 5**: The COP describes effective monitoring and evaluation mechanisms of Human Rights integration

ROBUST LABOUR MANAGEMENT POLICIES & PROCEDURES

CRITERION 6: The COP describes robust commitments, strategies or policies in the area of labour **CRITERION 7**: The COP describes effective management systems to integrate the labour principles

CRITERION 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration

ROBUST ENVIRONNEMENTAL MANAGEMENT POLICIES & PROCEDURES

CRITERION 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship

CRITERION 10: The COP describes effective management systems to integrate the environmental principles **CRITERION 11**: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship

ROBUST ANTI-CORRUPTION MANAGEMENT POLICIES & PROCEDURES

CRITERION 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption **CRITERION 13**: The COP describes effective management systems to integrate the anti-corruption principles **CRITERION 14**: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption

TAKING ACTION IN SUPPORT OF BROADER UN GOALS AND ISSUES

CRITERION 15: The COP describes core business contributions to UN goals and issues **CRITERION 16:** The COP describes strategic social investments and philanthropy **CRITERION 17:** The COP describes advocacy and public policy engagement **CRITERION 18:** The COP describes partnerships and collective action

CORPORATE SUSTAINABILITY GOVERNANCE AND LEADERSHIP

CRITERION 19: The COP describes CEO commitment and leadership **CRITERION 20**: The COP describes Board adoption and oversight **CRITERION 21**: The COP describes stakeholder engagement









Critères, meilleures pratiques et explication

IMPLEMENTING THE TEN PRINCIPLES

CRITERION 1: The COP describes mainstreaming into corporate functions and business units

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

CSR at Alten is integrated into all business functions and supported by all employees (support functions, Consultants, Engineers, Managers and Directions). Charters and commitments are displayed at multiple locations and communicated to all. The reference document (hereinafter DDR), charters and state political commitment of our CEO

Reference in the Registration Document 2015 Page 46

Give the executive responsibility for the sustainable development strategy with the relevant functions (procurement, public affairs, human resources, legal etc.), ensuring that no function is in conflict with the commitments and sustainable development goals.

Alten has formalized its CSR strategy through stakeholder consultation. The CSR management at the Chairman ensures that there is no conflict with the commitments and objectives of sustainable development. Each function meets the CSR guidelines.

Reference in the Registration Document 2015 Page 46

Align strategies, goals, and forms of incitement of all subsidiaries and business units with the sustainable development strategy.

Led by CEOs, the alignment of the whole group is a global CSR philosophy. The objectives and corporate values are the source of the definition of the CSR strategy and objectives.

Reference in the Registration Document 2015 Page 46

Assign responsibility for sustainable development to an individual or group in each unit or subsidiary.

A network of correspondents by country and subsidiary is deployed and will expand in 2016 to cover 80% of turnover.

Reference in the Registration Document 2015 Page 46 & 94

Design a strategy to increase synergies between and among the key areas and to manage the tradeoffs.

A Sustainable Development strategy and stakeholders materiality matrix, have been formalized and validated by CEO.

Reference in the Registration Document 2015 Page 49

Ensure that different corporate functions coordinate closely to maximize performance and avoid unwanted negative impacts.

Establishment of a CSR governance and project steering committees to ensure good definition of objectives and suitability issues with CSR.





CRITERION 2: The COP describes value chain implementation

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

Alten has formalized its CSR strategy in consultation with its employees. A network of external stakeholders allows a permanent sharing of progress and monitoring of its commitments. The founding documents: Sustainable purchasing Charter, Ethics and Compliance Charter set out the requirements and audits of the partners results for powering the improvement process.

Reference in the Registration Document 2015 pages 85, 92 to 94

Careful analysis of each segment of the value chain, both upstream and downstream, by drawing up a risk map, opportunities and impacts.

Implemented in late 2015, with the Purchasing Department, the mapping of CSR risks allowing better management of suppliers. The compliance check by questionnaire and return their signature certified by the commitment of being finalized charter. Established in 2016 compliance audits of CSR commitments.

Reference in the Registration Document 2015 pages 85, 92 to 94

□ Communicate policies and expectations to suppliers and other business partners.

In the tendering process CSR part is always covered, the founding documents are transmitted to our partners.

Reference in the Registration Document 2015 pages 85, 92 to 94

Audits will be scheduled at suppliers to ensure the support of our partners with the basic requirements of the CSR group. Action plans will then be co-constructed as part of continuous improvement.

Reference in the Registration Document 2015 pages 85, 92 to 94

Awareness, training and other skill building with suppliers and other business partners.

Following the audit areas for improvement may be recorded in an action plan with the support of founding documents and Alten CSR expertise, CSR Questionnaire.

Reference in the Registration Document 2015 pages 85, 92 to 94

Other good practices established or emerging, or due to the omission of this criterion.

CSR point realized with our suppliers during business reviews	Reference in
	the
	Registration
	Document
	2015 pages
	85, 92 to 94





ROBUST HUMAN RIGHTS MANAGEMENT POLICIES & PROCEDURES

CRITERION 3: The COP describes robust commitments, strategies or policies in the area of human rights

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

The ethical principles and compliance, and actions of the ALTEN Group within the framework of international laws and are explained in the founding documents of the group: Sustainable Development Charter, Ethics and Compliance Charter, Human Relations at work Charter, Politics FORCES: Health, Safety, Environment and CSR.

Reference in the Registration Document

Commitment to comply with all laws and respect the rights of internationally recognized human, wherever the company operates (Universal Declaration of Human Rights etc.).

The commitment is explained in the founding documents, including the Ethics and Compliance, the Charter of human relations at work. ALTEN is a signatory of the Global Compact of the United Nations and respect its 10 principles.

Reference in the Registration Document

Integrated or separate declaration of commitment for the respect and support of human rights, approved at the highest corporate level.

CEO, Simon Azoulay, sign a declaration of commitment publicly searchable in which it ensures the respect for the Universal Declaration of Human Rights, see ethics and compliance charter. Available on the website: www.alten.fr

Reference in the Registration Document

Declaration of Commitment stating expectations about human rights to employees and other stakeholders directly related to operations, products or services.

Statement of Simon Azoulay and founding documents mentioned above together with the aforementioned founding documents, such as ethics and compliance charter, the Human relations at work Charter.

Reference in the Registration Document

Declaration of Commitment publicly available, communicate to all staff in internal and external business partners or other stakeholders.

Available on the internal and external Alten website	See on web
	site
	www.alten.fr

☑ Other good practices established or emerging, or due to the omission of this criterion.

Awareness campaigns for all employees are deployed to break prejudices, integrate	Reference in
disabled workers, and increase the proportion of women in the world of industry and	the
engineering (partnership with the association They move). Top Employer certification.	Registration
	Document

Reference in the Registration Document Pages 83 and attached documents, See on web site: www.alten.fr





CRITERION 4: The COP describes effective management systems to integrate the Human Rights principles

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

For the fifth consecutive year, ALTEN gets the label Top Employer 2016 France recognizes companies for their HR policy. The award of this label is based on an audit repository built on a 400 HR practices covering the following aspects: training, diversity, political welfare, social responsibility, corporate culture, etc.

Reference in the Registration Document

☑ Process to ensure that international human rights are respected.

The ALTEN Group has an Ethics and Compliance Charter that formalizes the Group's commitments to exercise and develop its activities in strict compliance with national and international laws and regulations. Audits with statutory auditor, the subsidiaries and countries for validation of key figures in the RD.

Reference in the Registration Document

☐ Internal awareness and training on human rights for the management and employees.

An internal employee awareness is deployed with the development of e-learning on the ethics of business to business managers, also including respect for human rights. Sensitization is done through the following tools and documents: E-learnings, Amplify Training of managers, awareness campaigns about SD with a presentation and founding documents.

Reference in the Registration Document 2015

ALTEN Group provides several tools available to its employees such MyALERT or the Suggestion Box, which can be traced back problems or improvements; and a dedicated email address: ethics@alten.com with an alert form, Health Safety and working conditions Committee, and finally the constant social dialogue with the staff representative bodies.

Reference in the Registration Document 2015 parts 1 & 3

Assigning responsibilities to effectively address the impact on human rights.

ALTEN sets up an Ethics and Compliance Committee at World level, to ensure the proper appropriation and application of ethical principles of the Charter in all countries where the Group operates. Several alert channels are in development. Treatment of impacts is also considered an operational perspective by Human resources Department with the Legal Department and the support Security Directorate.

Reference in the Registration Document 2015 pages 64 & 83

Process to provide or cooperate in the resolution of negative impacts on human rights that the company has caused or which it contributed.

ALTEN has set up a crisis management process

Reference in the Registration Document

Processes or programs to support human rights by: the heart of business; Strategic / philanthropic / social investment; public engagement; partnerships and / or other forms of collective action.

In France and in the world ALTEN and its subsidiaries set up sponsorship activities, sponsorship and partnerships with public utility associations. For example, it is in Spain a toy for children suffering social exclusion, a collection Ile de France working clothes for donation to people who cannot afford workwear to spend their talks.

Reference in the Registration Document





In Germany supported refugees through the organization "Aktion Deutschland Hilft" could also be brought. A collection in India was held to help employees affected by floods of late 2015 that hit the state of Tamil Nadu.

☑ Other good practices established or emerging, or due to the omission of this criterion.

Partnership with associations as "Elles bougent" and labellings as "Top Employer".	Reference in
	the
	Registration
	Document

Référence dans le DDR 2015 partie 1 et 3, pages 58, 60, 64, 65, 66, 70, 83, 91.

CRITERION 5: The COP describes effective monitoring and evaluation mechanisms of Human Rights integration

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

ALTEN has enacted founding documents which lay down the requireme	nts to perform Reference in
control audits and evaluation of the integration of all subsidiaries and	sites principles the
related to human rights.	Registration
	Document

System to monitor the effectiveness and implementation of policies of human rights, with quantitative and qualitative measures, including in the supply chain.

Definition of actions and monitoring is done in project management mode with	Reference in
definition of indicators and associated improvement plan and communication of	the
results. The audits campaigns are organized annually.	Registration
	Document

Monitoring of internal and external information returns including affected stakeholders.

Monthly monitoring of alerts, the box ideas, alten.csr@alten.fr mails by the Quality	Reference in
and Performance Department.	the
	Registration
	Document
	pages 64 &
	65

Management review to monitore and improve results.

Steering Committee with Directorates, annual Management Review, HR Committee	Internal
and Ethics Committee.	Information

Process for managing incidents that the company has caused or which it has contributed to internal and external stakeholders.

Risk management	process	(GRI)	and	purchase	process	with	the	Responsible	FIP-GRI
Purchasing									Processus

Mechanisms legitimate complaint, accessible, regular, fair, transparent, consistent with the law, continuous learning sources, based on engagement and dialogue.

Complaints mechanisms are legitimate, accessible, regular, fair, transparent, and	Reference in
consistent with the law, continuous source of learning and based on engagement and	the
dialogue. Notably thanks to the existence of an ethical referent, the MyALERT tool,	Registration
which provides a form accessible to all and finally teams Personnel Administration	Document





Service are available to employees to address issues.

100% of our suppliers declare to be in accordance with our Charter and the UN principles.

The audits of all the "at-risk" suppliers will provide the necessary elements of evidence.

Reference in the RD pages 83/84

ROBUST LABOUR MANAGEMENT POLICIES & PROCEDURES

CRITERION 6: The COP describes robust commitments, strategies or policies in the area of labor

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and human resources dedicated.

The ALTEN Group is a signatory of the United Nations Global Compact and respects its 10 principles.

The company also adheres to the OECD Guidelines for Multinational Enterprises. The Group recognizes the Universal Declaration of Human Rights, the fundamental conventions of the International Labour Organisation (ILO). The founding documents are in line with these principles: FORCES Policy, Sustainable Development Charter, Code of Ethics, and commitment of the CEO, Simon Azoulay, to the UN Global Compact.

Reference to relevant international conventions (ILO Conventions) and other international standards in corporate policies.

See in the ethics and compliance charter, CEFRI & MASE certifications.

Reference in the RD 2015

The written company policy engages the group to respect the rights of national labor, respect international standards in international activities, and engage in dialogue with employee representative's organization (international, national or sectoral).

The company policy engages the Group ALTEN to respect the rights of core national labour laws and to respect the international standards in international activities.

ALTEN engages itself in dialogue with employee representatives organization (international, national or sectoral)

See in the ethics and compliance charter, the Politic calls FORCES and the bylaw.

Integration of references to the principles contained in international labor standards in contracts with suppliers and other relevant professional partners.

The sustainable purchasing charter and the Registration document are forwarded to its stakeholders (customers, partners and suppliers). Reference in the RD 2015

Human resources and specific political commitments aligned with the national development priorities or decent work priorities in countries of operation.

The politics called « FORCES » the Ethics and Conformity Charter, the CEO Reference in commitment, and an agreement on the work life quality focused on stress prevention and Psycho-Social Risks, insured and express this alignment between UN principles and the ALTEN social responsibilities and rules.

Participation and leadership in the broader efforts of employers' organizations (international and national) to collectively tackle the challenges concerning labor standards in the country of operation, possibly in a





tripartite approach (businesses, unions, governments).

ALTEN is a member of the SYNTEC board, so the Group is engaged to collectively tackle the challenges concerning labor standards in the country of operation. ALTEN would be a part of the tripartite approach to improve the UN principles application.

Reference in the RD 2015

CRITERION 7: The COP describes effective management systems to integrate the labour principles

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

ALTEN has implemented: the politic called « FORCES » (HSE & CSR politic) and others founding documents, a CSR department in charge of key social, environmental, societal indicators, MASE and CEFRI certifications, the building security politic.

Reference in the RD 2015 pages 64 &

☑ Risk assessments and impacts on labor standards.

OHS risk management is controlled by the Quality and Performance's Department which performs a risk assessment at work in order to eliminate risks or implement protective equipment needed when the risk cannot be eliminated for example. The principles and obligations laid down by the Labor Code are followed, respected and implemented.

Reference in the RD 2015

Mechanisms for dialogue with the unions to discuss regularly and check the progress of the company relating to labor standards.

Regular communications with the Health and Safety Committees (hereinafter HSC) and Employee Representative Bodies (hereinafter ERB).

Reference in the RD 2015

☑ Allocation of labor standards related responsibilities in the organization.

OSH responsibility depends on the Quality and Performance Department. Processes have been implemented and are monitored to ensure the right level of mastery of the issues and labor standards in relation to HRD. The MASE and CEFRI certifications are added to the level of requirements met by Alten.

Reference in the RD 2015

Systematically for all new employees: OSH awareness, welcome booklet and HSE booklet, e-learnings, Quiz CSR.

Refer the R

Reference in the RD 2015

Active engagement with suppliers on the challenges to labor standards.

Signing the Ethics and Compliance by partners.

Reference in the RD 2015

Complaint mechanisms, communication channels and other procedures (eg reporting mechanisms) available for employees to report concerns, make suggestions or ask advice, designed and operated in agreement with the representatives of workers' organizations.

Warning procedures allow employees to report anonymously and protected manner possible violations of the Code of Ethics. Ethical breaches can then be communicated via the email address alten.csr@alten.fr, occupational physicians, staff representatives, local legal, career managers or line managers.

Internal processus





CRITERION 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

FORCES Policy, Risk Management Process (GRI).	Internal
	document

System to track and measure performance based on standardized performance measures.

Facilities management's Department has established monthly reporting of KPIs on the
following topics: regulatory requirements, safety sites, environmental management
(buildings consumption, waste) and employee safety. Furthermore, Quality &
Performance's Department has set up its own reporting on the safety of people, led
by a Visual project management. Regulatory monitoring is also provided. An
environmental analysis is also performed for each site certified ISO 14001. All
required periodic checks is made by the Facilities management's Department.

Reference in the RD 2015

Dialogues with representatives of workers' organizations to regularly monitor progress and jointly identify priorities for the future.

Quarterly meetings of the HSC are organized to discuss progress on labor standards.	Reference in
	the RD 2015

Audits or other measures to control and improve standards of corporate work in the supply chain, in line with international labor standards.

Through audits: MASE, CEFRI, HSE, ISO 14001, and control all of the buildings at a	Reference in
minimum once a year, Alten ensures compliance with labor standards.	the RD 2015

Process to positively involve suppliers to address the challenges (partnership approach rather than corrective) by systems to improve practices on workplace.

Responsible Purchasing Policy,	sharing good	practice and	joint assessment	of	Reference in
compliance with standards					the RD 2015

□ Results of the principles integration relating to labor standards.

SST balance sheet see Annual Reporting 2015.	Reference in
	the RD 2015
	page 98





ROBUST ENVIRONNEMENTAL MANAGEMENT POLICIES & PROCEDURES

CRITERION 9: The COP describes robust commitments, strategies or policies in the area of environmental

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

ALTEN FORCES Policy integrates the environment and sustainable development. Certification of ISO 14001 Environmental Management System renewed in 2016. A travel policy to reduce the environmental footprint was strengthened.

Reference in the RD 2015 pages 86, 87, 94, 98

Reference to relevant international conventions and other international mechanisms (eg the Rio Declaration on Environment and Development).

Group reference to the principles of the Global Compact of the United Nations. ISO 14001 and CSR approach with official support for the objectives of COP 21 with two weeks of communication to raise employee awareness of climate change and the need to realize that sustainable development is everyone's business.

Reference in the RD 2015 pages 86, 94, 98

Reflecting on the relevance of sustainable environmental management for the company.

An annual review of CSR Strategy and monthly progress points are made with the Reference in CEO, Simon Azoulay.

the RD 2015 pages 86, 94,

FORCES policy and Sustainable Development Charter, attached.	Reference in
	the RD 2015

☐ Integration of minimum environmental standards in contracts with suppliers and other relevant professional partners.

Responsible purchasing Charter and environmental criteria included in tendering and	Reference in
in partners selection process.	the RD 2015
	page 85

Specific commitments and targets for specified years.

CSR strategy and ISO14001 environmental management plan.	Reference in
ALTEN has entered into an electricity supply contract, 100% renewable origin, for the	the RD 2015
next three years and for more than 80% of its consumption. Alten has implemented e-	page 86 & 94
learnings environmentally friendly practices and eco-driving for all employees.	





CRITERION 10: The COP describes effective management systems to integrate the environmental principles

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

FORCES policy integrates the environment and sustainable development, Certification of Environmental Management System ISO 14001: SME (Environmental Management Plan).

Reference in the RD 2015 Strategy

⊠ Risks and environmental impacts assessment.

As part of its ISO 14001 certification, renewed in 2016, ALTEN carries its environmental analysis and is updating it with each change in the scope, development of activities and every year if no changes.

ISO 14001 Certification

Person in charge of CSR and ISO 14001 directly related to Quality and Performance's Department, which directly related to the CEO, Simon Azoulay. In collaboration with the Facilities management Department, all environmental issues are reassessed and reviewed quarterly.

Reference in the RD 2015

Internal awareness and training on sustainable environmental management for the management and employees.

ALTEN has implemented e-learnings environmentally friendly practices and ecodriving, sensitization workshops carried out at sites closest of employees, including a Quiz CSR is to question the employees and provide answers on all environmental themes. Always insisting on the problem that it is the actions of all who will have a positive impact for the Planet.

Reference in the RD 2015

□ Complaint mechanisms, communication channels and other procedures (eg reporting mechanisms) to report concerns or seek advice on environmental impacts.

Each employee is given a workbook to raise awareness of their rights. The ALTEN Group has implemented a new tool "MyAlert" to encourage employees to report any malfunction or abnormal situation identified in the company. Regarding emergencies (hydrocarbon leaks for example) an emergency procedure and a number to alert are communicated to all employees. A box idea also allows them to go any innovative positive suggestion. Mail CSR: alten.csr@alten.fr.

Reference in the RD 2015

☑ Other good practices established or emerging, or due to the omission of this criterion.

Alten has installed on the roof of a building the hives to educate people and help safeguard biodiversity. The fleet of internal vehicle is now fully electric. Computer equipment discarded are remastered and given to associations to be offered to people in difficulties (Project D2A). Taxis orders by the hostesses are always taxis so-called "green" (hybrid or electric vehicles). Environmental criteria are integrated in the traveling platform forcing the choice of solutions with a reduced CO2 impact. The travel policy is also built around the criteria for the reduction of environmental impacts.

Reference in the RD 2015





CRITERION 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

ALTEN has QHSE indicators that are monitored monthly within the Directorate of General Services and the Directorate Quality & Performance. These financial indicators are present in the reference document. FORCES Policy integrates the environment and sustainable development. The Certification of Environmental Management System ISO 14001 include an EMP (Environmental Management Plan).

Reference in the RD 2015

System to track and measure performance based on standardized performance measures.

Directorate General Resources Group has established monthly reporting of KPIs on the following topics: regulatory requirements, safety sites, environmental management (buildings consumption, waste) and employee safety. The Quality and Performance track and measure KPIs CSR.

Reference in the RD 2015 page 98

⊠ Review of management in monitoring and improving results.

Monthly Point with the CEO to monitor the results and adjust the CSR objectives. Fund Update with the General Services Department. Business reviews with partners. Annual review with management to take stock and set goals for the next year. The indicators published in the reference document are subject to review by the Finance Department, which reviews developments and performance KPIs. These indicators are audited by the Statutory Auditors.

Reference in the RD 2015

Incident reporting by general services, environmental analysis by the QPD and implementation of preventive and curative actions. To manage environmental incidents, procedures / capacity sheets to respond are available to employees. Crisis management system in place.

Internal Process

Audits or other measures to monitor and improve the performance of supply chain companies about the environmental impacts.

SO 14001 annual audits, annual emergency exercises.	Reference in
	the RD 2015

Results of the integration of the principles relating to the environment.

ľ	Examples of results: positive development of carbon footprint, reducing paper	Reference in
	consumption per employee, stabilizing water consumption per employee; etc. Confers	the RD 2015
	indicators DDR 2015.	page 98





ROBUST ANTI-CORRUPTION MANAGEMENT POLICIES & PROCEDURES

CRITERION 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

Three founding documents show strong management support to the fight against	Reference in
corruption: Sustainable Development Charter, responsible purchasing charter and	the RD 2015
code of ethics.	

The Ethic and Compliance Charter signed by CEO, contains a section dedicated to the	Reference in	
fight against corruption, reflecting the political establishment.	the RD 2015	

The Ethic and Compliance Charter signed by CEO, contains a section dedicated to the	Reference in
fight against corruption, reflecting the political establishment.	the RD 2015

Commitment to comply with all laws relating to corruption, establishment of procedures to know the law and monitor its developments.

A Unique Document, the commitment of the CEO in the ethics and compliance	Reference in
charter, the Oversight Committee and Watch Committee.	the RD 2015

Statement in support of relevant regional and international legal structures (eg the United Nations Convention against Corruption).

Supports Compact UNITED Nations and compliance with its principles.	Reference in
	the RD 2015

□ Detailed Politics on the high risk areas of corruption.

ALTEN works in progress via the construction of the ethical risks mapping.	Reference in
	the RD 2015

The Ethic and Compliance Charter and Responsible Purchasing Charter, include a	Reference in
section dedicated to corruption and trade relations.	the RD 2015

☑ Other good practices established or emerging, or due to the omission of this criterion.

As part of an integration process of each business manager and, given the activity of	Reference in
the latter, ALTEN has designed a comprehensive e-learning, mandatory arrival of	the RD 2015
managers, including such ethical business principles of the Group. It will be provided	Training
to 100% by the end of 2016.	internal
	information





CRITERION 13: The COP describes effective management systems to integrate the anticorruption principles

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

The welcome booklet sent to every newcomer supports the anti-corruption policy by	Reference in
informing employees. E-learning for managers is also being prepared.	the RD 2015

⊠ Risk assessment realization for potential corruption zones.

During the	CSR	audits,	including	audit	requirements	the	Code	of	Ethics	and	Reference in
Compliance i	s an i	input dat	ta.								the RD 2015

Human Resources procedures that support the commitment or the anti-corruption policy, including communication and training for all employees.

E-learning which included the	anti-corruption p	policy, dedicated	for managers, i	Reference in
compulsory from their hiring				the RD 2015

Actions taken to encourage business partners to take anti-corruption commitments.

ALTEN is joining the Globa	al Compact and communicate on. The Group reports	its Reference in
requirements of corrupt	ion to its suppliers and subcontractors: Responsik	ble the RD 2015
Purchasing Charter and Cod	de of Ethics.	

Management's responsibility for implementing commitments and anti-corruption policies.

Establishment of the Committee Ethics at the initiative of the CEO.	Reference in
	the RD 2015

Communication channels (red flags) and monitoring mechanisms to report concerns or seek advice.

As part of the ethics policy in place, an alert procedure exists and is associated wit	h Reference in
back up information channels: MyALERT, CSR generic email address to communicat	e the RD 2015
with the CSR manager.	

☑ Internal accounting and auditing procedures for the Anti-corruption.

Coming soon with CSR audits in all countries. Many internal procedures take into	Reference in
account the principle of non-corruption.	the RD 2015





CRITERION 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

The planned monitoring and evaluation activities are: Ethics and Compliance	
Committee, alert channels, e-learning.	the RD 2015
	Ethic &
	Compliance
	Charter

Ethical Committees enable the Directorate to monitor the principles of integrity and	Ethic &
ethical principles set out in its Charter and Alten and take measures necessary for	Compliance
improvement.	Charter
The role of the Ethics Committee is to: analyze risks, deploy action plans, to monitor	
the proper application of the rules and in a second time to collect alerts, analyze them	
to finally treat.	

oxdot Process for managing incidents.

Many processes are incremented controls to ensure the principle related to the anti-	Internal
corruption (see above).	information

Résultats de l'intégration des principes relatifs à la lutte contre la corruption.

No incident in 2015.	Internal
	information

☑ Other good practices established or emerging, or due to the omission of this criterion.

The procedures for the fight against corruption will be formalized in the quality	Internal
management system for accounting procedures in 2016.	information





TAKING ACTION IN SUPPORT OF BROADER UN GOALS AND ISSUES

UN's broader objectives refer to a range of global issues - based on the most capital and chronic global challenges:

CRITERION 15: The COP describes core business contributions to UN goals and issues

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

The women and men who make up the ALTEN group are the engine of activity. ALTEN	Reference in
thus sets up a dynamic human capital management policy focused on diversity and	the RD 2015
skills development.	
The Group also contributes to environmental preservation through its global quality,	
Safety and Sustainable Development called "FORCES" policy. The ALTEN founding	
documents and the RD 2015 is full of examples of the ALTEN commitment.	

☐ Align core business strategy with one or more relevant objectives of the United Nations.

The ALTEN R&D Department work are not direct profit, it allows research to	Reference in
contribute to the broader goals and to the United Nations issues.	the RD 2015
They work on:	
The overall safety and risk control;	
Sustainable mobility;	
The energy performance;	
Quality of life and consumer services.	

Products development, services and business models that contribute to UN objectives and themes.

Aware that its activities and the industries in which it operates gives it indirect	Reference in
environmental responsibility to its customers, ALTEN is committed to developing	the RD 2015
innovative and sustainable solutions. See above.	page 74

oxtimes Adopt or modify operating procedures to maximize contribution to UN objectives and themes.

ALTEN processes address our policies and therefore UN issues.	Reference in	
	the RD 2015	

☑ Other good practices established or emerging, or due to the omission of this criterion.

ALTEN has many partnerships with schools, public utility associations, the SYNTEC and	Reference in
in parallel drives for patronage and sponsoring thus contributing to UN goals and	the RD 2015
issues. Concrete examples: Partnership with the association "Elles bougent"	pages 46 à
(Education and Gender Equality), ALTEN's hives installation in partnership with Société	91
Générale and Green Affair (biodiversity conservation). Moreover ALTEN has set up an	
internal valorisation of its employees by setting up AWARDS, a system that allows	
employees and their managers to highlight projects or team performance.	





CRITERION 16: The COP describes strategic social investments and philanthropy

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

ALTEN has many partnerships with schools, public utility associations, the SYNTEC and in parallel drives for patronage and sponsoring thus contributing to UN goals and issues. Concrete examples: Partnership with the association "Elles bougent" (Education and Gender Equality), ALTEN's hives installation in partnership with Société Générale and Green Affair (biodiversity conservation). Moreover ALTEN has set up an internal valorisation of its employees by setting up AWARDS, a system that allows employees and their managers to highlight projects or team performance. Moreover the R&D Department has a great creativity on these subjects.

Reference in the RD 2015 pages 46 à

The Group carries out actions for skills sponsorship. For example: - ALTEN created a department to aid associations (D2A) to offer free computer hardware and development tools to charities or general- interest. As part of its domestic sponsorship program, ALTEN decided to support the Colombbus association, whose objectives are to promote an "active" computer use, awareness of the areas of digital, enable success for all and equal opportunities, enhance creativity and entrepreneurial spirit. The Group established in 2010 with an endowment fund (ALTEN fund for engineering) for the valuation of the engineering profession.

Reference in the RD 2015

Coordinate its efforts with other organizations and initiatives to Amplifier- and not deny or dupliquer- the efforts of other contributors.

Partnership with the association "Elles bougent", Advanced Global Compact member, participation to the CSR SYNTEC club (member), CDP and EcoVadis member.

Reference in the RD 2015

CRITERION 17: The COP describes advocacy and public policy engagement

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and human resources dedicated.

Active participation to positively influence CSR developments with the SYNTEC (CSR	Reference in
SYNTEC club member).	the RD 2015

Public commitment on the importance of acting on one or more target (s) / theme (s) United Nations.

ALTEN CEO encourages Group employees to engage themselves in the sustainable	Reference in
development approach in place.	the RD 2015

Encourage business leaders to participate in conferences, summits and other important interactions on public policy related to one or more target (s) / theme (s) United Nations.

ALTEN supports alongside its peers the Global Compact principles in France and in the	Reference in
United States. Simon Azoulay, the ALTEN CEO, was Honorary President of the	the RD 2015
association "Elles bougent"	





CRITERION 18: The COP describes partnerships and collective action

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

ALTEN has many partnerships with schools, public utility associations, the SYNTEC and in parallel drives for patronage and sponsoring thus contributing to UN goals and issues. Concrete examples: Partnership with the association "Elles bougent" (Education and Gender Equality), ALTEN's hives installation in partnership with Société Générale and Green Affair (biodiversity conservation). Moreover ALTEN has set up an internal valorisation of its employees by setting up AWARDS, a system that allows employees and their managers to highlight projects or team performance. Moreover the R&D Department has a great creativity on these subjects.

Reference in the RD 2015 pages 46 à 91

Develop and implement partnerships with public or private organizations (UN entities, Government, NGOs and others) in the core business, social investments and / or "advocacy".

As a European leader in Engineering and Technology Consulting, the ALTEN Group strives to enhance the engineering professions and create vocations among students, especially girls. To do this, ALTEN is committed in schools and developing multiple links of proximity to future graduates to open the world of business: Job Tour, mock interviews, resume workshops, business conferences, consultants testimonials, etc. The Group also weaves many special partnerships with associations of student representation and promotion (internal and external) scientific careers and professions of engineering: National Confederation of Junior Enterprises; Pasc@line; "Elles bougent" or "Les Elles d'Alten." Finally, ALTEN supports initiatives and projects led by exceptional engineering as part of several national and local awards: for example, the Year of Engineers Award; Trophy of Industry Women; the Future Engineer Award; the competition Open Mind; or challenge the "48 hours of innovation."

Reference in the RD 2015 pages 46 à 91

☑ Join industry peers, United Nations entities and / or stakeholders on initiatives contributing to solving common challenges and dilemmas to the local or global level, with a focus on initiatives extending the positive impact the company on its value chain (see criterion 2).

ALTEN shows a strong and participatory engagement with the SYNTEC (CSR Club) and the Peer Review of the Global Compact. His participation is active in CSR Workshop customers. The company is also active on the association board called "Elles bougent".

Reference in the RD 2015 pages 46 à 91





CORPORATE SUSTAINABILITY GOVERNANCE AND LEADERSHIP

CRITERION 19: The COP describes CEO commitment and leadership

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

The incorporation of CSR department directly to the CEO ALTEN.	Reference in
	the RD 2015
	pages 46

☐ The President issued an explicit public commitment, demonstrate personal leadership on sustainability and commitment to the Global Compact.

Public and explicit commitment of ALTEN CEO, and towards the Global Compact	Reference in	
commitment in the CEO's introduction letter included in Annual Reporting.	the RD 2015	
	pages 46	

President promotes initiatives improving the sustainability of the company's industry and leads the development of standards for industry.

ALTEN is committed to the implementation of responsible practices alongside the	Reference in
SYNTEC Engineering and towards its customers. Reference to the ALTEN R&D	the RD 2015
Department whose work are not direct profit	pages 46

☐ The President leads the executive management team in the design of the sustainable development strategy, setting goals and monitoring their implementation.

Reporting directly to the CEO, the CSR strategy is de-	fined and validated by the Reference in
executive management team.	the RD 2015
	pages 46

☑ Integrate sustainable development criteria and principles of the Global Compact objectives and incentive programs for the CEO and the management team.

CSR criteria and principles of the Global Compact objectives and incentive programs	Internal
are directly integrated by and for the CEO and the management team	information





CRITERION 20: The COP describes Board adoption and oversight

☐ The Board of Directors (or equivalent) responsible and monitoring the strategy and long-term CSR performance.

CSR strategy and objectives are validated at the highest policy level because now reports directly to the ALTEN Presidency. The board valid the Registration Document including sections 3 and 4. The main elements of the CSR strategy are presented to the Board.

Reference in the RD 2015 pages 46

☐ The Board of Directors shall, where possible, a monitoring committee or assigns CSR Council Member.

The functions responsible for CSR are directly attached to the ALTEN Presidency who is a member of the board.

Reference in the RD 2015

☐ The Council (or the Committee), where possible, approve the formal reporting CSR (Communication on Progress).

CSR reporting is validated by the Council and deployed to all sites in French and in English.

Reference in the RD 2015





CRITERION 21: The COP describes stakeholder engagement

Relevant policies, procedures and activities that the company plans to take to fulfill this criterion, including objectives, planning, action and dedicated human resources.

Defined strategy with objectives and a schedule from the stakeholder consultation, the performance indicators are in progress. A person in charge of CSR and Sustainable Development manages the full-time activities: policies, procedures, awareness raising expectations and requirements stakeholders also relayed by the operational services. A corresponding network site, subsidiary, country is underway. A stakeholder mapping was performed. communication specific arrangements have been put in place to be in contact with candidates, students, schools and universities and employees (our stakeholders rank 1)

Reference in the RD 2015 page 46 à 91

☐ Corporate responsibility publicly recognized for its impact on internal and external stakeholders.

ALTEN responsibility is publicly recognized: scoring Ecovadis 74/100, Certification Top employer, Winner Leadership Index, scoring 100B to CDP evaluation, Advanced Distinction Global Compact, CSR Annual Report publicly available.

Reference in the RD 2015 page 46 à 91

☐ Define sustainability strategies, goals and policies in consultation with key stakeholders.

The materiality matrix was built based on two key criteria: the importance for stakeholders and the impact on the company's business and therefore the response to stakeholder requirements. A monitoring committee meets biannually with stakeholders to improve our line with their expectations.

Reference in the RD 2015 page 46 à 91

A questionnaire is ready to be made available to stakeholders in 2016 to update and adequacy of good CSR strategy with its stakeholders. The idea box allows to reap the requirements and expectations of stakeholders identified. A quiz sustainable development being broadcast also will collect the opinions and level of consistency with the expectations of stakeholders. MyALERT allows employees to report any malfunction or abnormal situation

Reference in the RD 2015 page 46 à 91

Establish communication channels to engage with employees and other stakeholders to hear their ideas, address their concerns and protect "the complainants".

On the Intranet: MyALTEN, the email address alten.csr@alten.fr, the questionnaire, the box idea, the quiz sustainable development are the tools that help to ensure good communication and capture expectations stakeholders.

Reference in the RD 2015 page 46 à 91

☑ Other good practices established or emerging, or due to the omission of this criterion.

An ALTEN Ideas competition is also under construction.

Internal information





GLOSSARY

ALTEN Founding documents: Ethics and Compliance Charter, Human relations at work Charter, Sustainability Charter, Sustainable Purchasing Charter.

Biodiversity: Living diversity inhabiting an ecosystem

Carbon footprint « Bilan Carbone »: Assessment of GHG (Greenhouse Gas) human activity (Industrial, occupational, domestic, etc).

Carbone Disclosure Project (CDP): The CDP is a secretariat to coordinate the collaboration of institutional investors about the problem of climate change.

CSR: Corporate Social Responsibility: CSR is a voluntary approach to conduct of business affairs, reflecting the contribution of business to sustainable development which is defined as "development that meets present needs without compromising the ability of future generations to meet their own needs. CSR is applicable to companies regardless of sector, size or their market. However, it is obvious that the depth and scope of their involvement in this area vary according to their specificities. More companies emphasize on the operational aspect of CSR, rather than a formal approach. The CSR Portal aims to provide a repository that reasonably applies to companies, taking into account their capabilities and their limitations in order to make progress in their ongoing quest for improvement and development. Recommendations CSR will enable businesses to balance and integrate economic, environmental and social imperatives while meeting the expectations of their shareholders. CSR portal wants companies adopt CSR with the legitimate desire to get forward a clear competitive advantage and stimulate business innovation while meeting the market requirements. To this end, each recommendation is accompanied by a description of the benefits to be aimed by the company. Compliance with laws and regulations by companies as to the social, environmental and economic establishes the basic level of performance of any business towards CSR, as it includes commitments and voluntary activities the company beyond this foundation of legal compliance.

CSR report: It presents the detailed environmental and social information of the entity. **Or RD**: Registration Document / Annual CSR and Financial Reporting

Eco driving: Economic and ecological. Eco-driving is to apply tips and driving techniques that reduce fuel consumption for a given journey, regardless of the vehicle used. Effective management of the magnitude of acceleration is one of the most important principles of eco-driving. The training in eco-driving used to achieve an average 20% fuel economy. Use engine braking, smooth acceleration, anticipating stops, are the main areas of eco-responsible driving. Eco-driving resides essentially in the serenity of the driver and a little common sense. It is a way to conduct a general attitude that translates into better compliance and those around us. In the end, everyone wins. Well respected, different tips will pollute less and seriously optimize the fuel budget. Common, they do not seek any investment, if not a little patience. Devote time to preparing his vehicle, its route, and reduce speed, turn out to be wasteful. Take your time is money and a real contribution to the planet.

E-learning: Online Learning.

ERB: Employee Representative Bodies

Global Compact: The Global Compact is a UN initiative launched in 2000 to encourage companies across the world to adopt a socially responsible attitude by committing to integrate and promote human rights principles work for human rights sustainable development and the fight against corruption.

GRI: Global Reporting Initiative.

Structure that creates a common framework for the development of sustainability reports.

HQE Operations certification: A HQE building is a building that meets a set of targets to reduce short- and long-term environmental impacts of it.

HSC: Health and Safety Committees





ISO 14000: The series of ISO 14000 designates all standards for environmental management.

Low Energy building: The term low consumption building suggests "energy" building. A low-energy building is a building which we worked on the energy performance and whose energy consumption allows it to heat is improved compared to standard buildings.

Materiality matrix or materiality test: This is a methodological approach that can identify and prioritize CSR challenges of a business. Having determined the CSR challenges of the entity, taking into account the degree of importance given to each issue by stakeholders and the degree of importance of each issue to the company's business.

Monitoring: Technique to control, analyze, monitor, etc.

QPD: Quality & Performance Department

Responsible purchasing: The purchasing responsible sometimes called "eco-purchase" or "sustainable purchase" consist of the integration of sustainable development criteria in procurement practices

Societal: On society.

Stakeholders: Stakeholders are individual or collective actors involved in projects or decisions.

Sustainable Development (SD): development that meets the needs of the present without compromising the ability of future generations to meet theirs.

UN: United Nations



