

January 2017

# ETHICS & COMPLIANCE POLICY



*E&C is a part of everything we do at Alstom. Whether it is working with partners, suppliers, advisors or other third parties, in our interactions with our customers, who are often public officials, sponsoring activities or in charitable donations, bribery and corruption risks could jeopardize the activities of the company and could lead to criminal liability for our employees.*

*The dedicated and independent E&C team and its network of E&C ambassadors have positioned themselves close to the business activities to provide constant, practical advice and oversight of our activities.*

*To support the E&C team, we must all play our part by encouraging ethical conduct within our teams, supporting E&C initiatives and activities and supporting the use and development of the Alstom Alert Procedure.*

*When it comes to ethical business conduct, we must all be on board!*

Henri  
POUPART-LAFARGE  
CEO

Pierrick  
LE GOFF  
General Counsel

Alstom's commitment to ethical business conduct is a fundamental part of our business and a value shared by the Board of directors, the CEO and senior management, and every Alstom employee. Full compliance with all applicable laws and regulations is critical not only to our success, but also to our existence as a company. E&C is everyone's concern.

## OUR E&C COMMITMENTS

To provide clear and timely support and guidance to ensure full compliance with all laws and regulations in our areas of activities.

To ensure the prevention of bribery through the proper implementation, compliance and continuous improvement of all Alstom E&C instructions, including:

- Receiving and offering gifts and hospitality
- Working with sales partners
- Relations with JV and consortium partners
- Working with suppliers and professional advisors
- Sponsorship and charitable activities
- Prohibition of political contributions
- Prohibition of facilitation payments and other forms of corruption
- Complying with international sanction regimes
- Data Privacy

To manage and develop the Alstom Alert Procedure to ensure a timely investigation and treatment of all reports and guarantee the Alstom policies of full confidentiality and non-retaliation against any employee who reports in good faith.

To ensure that appropriate disciplinary actions are taken against any employee who violates the E&C rules.