

Our
code of
ethics



Our values

A framework for our day-to-day business

We share three essential values - Team, Trust and Action. These values are the driving force of Alstom's employees in their working lives.

Team

Alstom's business is based on delivering projects which require discipline and effort to execute them successfully.

Teamwork is the way we achieve our collective and individual objectives. Team working means collaboration at all levels of the organisation and extends to our external partners. It also involves networking to ensure we take full advantage of all the competencies available. Creating a team spirit is essential to ensure that every employee plays a role in the success of the Company, with a collective drive to deliver on our customers' projects.

Trust

Alstom, with its activities, several management structures, units, production sites and countries, is by definition a complex company. Trust is essential for the proper conduct of our business and the efficient management of our projects.

Trust is closely associated with professionalism, integrity, compliance and responsibility. Mutual trust between colleagues, management and external partners enables empowerment and the delegation of authority. In return, anyone exercising this delegation is accountable for the decisions taken, their actions and their consequences. When we work in a mindset of trust, we are open to our professional environment and ethical and transparent in our dealings.

Action

Alstom commits to delivering products and services to its customers which meet their expectations in terms of price, quality and delivery schedules. To meet our commitments to our customers, action is a priority for us all.

Action means approaching our business with a sense of excellence in its execution. It requires us to set priorities to achieve our deadlines and to ensure that everything we do creates value for the business. Action is underlined by a sense of service to our internal and external stakeholders and delivering on our commitments.

Message from the Chairman & CEO

“We share a strong culture of ethics and common values, We are Alstom”

Alstom strives to be the preferred partner for transport solutions around the world. At the heart of this strategy is our fundamental commitment to ethical conduct. We have an obligation to our employees, customers, shareholders and other stakeholders to uphold the highest standards of behavior in compliance with all applicable laws and our internal rules and procedures. This approach is not only the right thing to do, but it is also good business - and is embodied in our core value – Team, Trust and Action – which guides all of our efforts as Alstom employees.

This Code of Ethics should serve as a guidepost throughout our careers at Alstom. As a new employee, I invite you to read and adopt the principles and rules of our Code of Ethics and seek guidance for any questions you may have. As we develop in the Company, let's all be an example to our colleagues and seek opportunities to participate in our ethical business efforts, including by becoming, for example, a member of our Ethics & Compliance Ambassador community.

Our Code of Ethics cannot exist without us, the Alstom team. Continuous improvement and corrective measures are an integral part of the compliance process. If you have concerns or witness unacceptable behavior, I urge you to use our internal reporting system, the Alstom Alert Procedure, to bring issues to the attention of the Ethics & Compliance team. Breaches of our rules will result in appropriate disciplinary measures and I will ensure that no one who raises a concern will be subject to retaliation in any form.

Our values and our ethical rules are a source of pride and unity at Alstom. They are one of our most valuable assets and we shall continue to draw on them as a source of strength and guidance. It is critical to our successful future that each one of us upholds the daily commitment to apply the Code of Ethics and promote it both within our teams and to the outside world.



Henri Poupart-Lafarge
Chairman & CEO



Table of contents

Our values	2
Message from the Chairman & CEO	3
Introduction	6
Who needs to apply the Code of Ethics ...	6
Your responsibilities as Alstom employees ..	7
Your responsibilities as Alstom managers ..	7
Considering ethics in decision-making	8
The Alstom Integrity Programme	9
How to obtain information and get answers to your questions	9
How to report a concern	10

Our fundamental principles	11
Respect laws and regulations	11
Respect all Alstom rules and policies	11
Prevent corruption and bribery	12
Comply with competition laws	13
Play your role in internal control and disclosure of information	14
Our essential rules	15
Create business trust with our business partners	15
Customers	15
Suppliers and contractors	15
Sales Partners	16
Government procurement	16
Export controls and trade restrictions	16
Anti-Money Laundering	17
Conflicts of interest	17
Gifts and hospitality	18
Assume a pivotal role in our environment	19
Environmental protection	19
Community relations	19
Political contributions and activity	20
Charitable contributions	20
Sponsorship	20
Foster a team spirit	21
Respect of human rights	21
Relationships with employees	21
Career management for employees	21
Equal opportunity and diversity	22
Health and safety	22
Security of employees	23
Data privacy	23
Protect Alstom's assets	24
Communications resources	24
Respect for confidential information	25
Intellectual property	25
Insider dealing	26
Communication with analysts and/or investors	26
Communication with the media	27
Use of social networks	27

Introduction

As a multinational company, Alstom complies with all the laws and regulations of the countries in which it operates. Failure to comply with these laws and regulations may subject Alstom and the individuals involved to substantial civil and criminal sanctions.

Alstom has decided to put in place stringent rules setting very high standards. Alstom does not tolerate any deviation from the rules. The Code of Ethics outlines our values and explains our commitment to lawful and ethical conduct, wherever we do business. Some issues are addressed in the Code of Ethics with guidance. However, the Code of Ethics is not intended to cover every topic: it is designed at a high level to help you think through the issues you might face in your day-to-day work. Where and when appropriate, you should refer to the more detailed Alstom Instructions.

The Code of Ethics is applicable to all employees, including managers and officers in Alstom, as well as members of the Board of Directors when they act in connection with Alstom-related duties. Hereafter, when “employees” is referred to, it is taken to mean employees, managers, officers and directors. All employees should take time to become familiar with the content of the Code of Ethics.

Adhering to the Code of Ethics will help protect Alstom and yourself. It not only applies to individuals but also to every structure in which Alstom holds a stake or participates, including subsidiaries, affiliates, joint ventures and consortiums.

If confronted with an ethical issue, you should always contact the most appropriate person to assist you including, but not limited to, a member of the Ethics & Compliance Department. As some situations may be delicate and difficult, and may present more than one correct answer, you should consult the Code of Ethics. The Code of Ethics and related Alstom Instructions are regularly updated. You should keep yourself informed of each update, ask any questions you may have and apply the latest version of applicable rules.

Who needs to apply the Code of Ethics

- All Alstom employees;
- Any entity created with one or more partners, and controlled by Alstom. The list of entities includes and is not limited to: subsidiaries, controlled affiliates, controlled joint ventures;
- Any other entity non controlled by Alstom, including, but not limited, to non-controlled joint ventures and consortiums members are expected to apply the principles described in the Code of Ethics. When such entity fails to abide by those ethical rules and compliance procedures, Alstom employees must take appropriate actions, such as informing their direct manager, taking corrective actions and imposing sanctions.

Your responsibilities as Alstom employees

As Alstom employees, you have to set an example of ethical and compliant conduct. It is important that you:

- Gain a basic understanding of the issues and associated guidance addressed in the Code of Ethics;
- Keep yourselves informed of any update of the Code of Ethics, since you are expected to apply the latest version of the document;
- Have a thorough understanding of Alstom Instructions and procedures relevant to your job and regularly check for complete and up-to-date information;
- Contact your management or any other person, i.e. Legal, Internal Control, Internal Audit, Ethics & Compliance, Ethics & Compliance Ambassadors or HR representative(s), with any questions you may have concerning the Alstom Integrity Programme (including the Code of Ethics or the Alstom Instructions);
- Know how to use the Alstom Alert Procedure and any other channels to report a concern, in accordance with the laws and regulations applicable in your country.

Failure to comply with the Code of Ethics may not only expose Alstom to sanctions but also you as employees.

Your responsibilities as Alstom managers

Ethical and compliant conduct starts from the top. As Alstom managers, your responsibilities go beyond those of an employee. You have to set high standards of ethical conduct and keep your commitments. You have a role of:

Promotion:

- Have a thorough knowledge of the issues and associated guidance addressed in the Code of Ethics;
- Provide knowledge on the Code of Ethics, relevant Alstom Instructions and applicable laws and regulations to employees and where appropriate, to partners doing business with Alstom and representing Alstom;
- Ensure your team is trained on the Code of Ethics and relevant Alstom policies;
- Identify and proactively mitigate your business compliance risks;
- Ensure that processes, tailored to address your particular risks areas, are communicated throughout your organisation, are well understood and are implemented;

Detection and response:

- Promote the Alstom Alert Procedure within your team in accordance with the applicable laws and regulations in your country;
- Escalate without delay any issue reported to you to the relevant person, i.e. Management, Legal, Internal Control, Internal Audit, Ethics & Compliance, Ethics & Compliance Ambassadors or HR representative(s);
- Decide and take corrective action to fix any issues, in collaboration with the relevant competent persons.

Failure to comply with the Code of Ethics may not only expose Alstom to sanctions but also you as managers.

Considering ethics in decision-making

- Strictly follow Alstom's rules and Alstom Instructions;
- Use your common sense;
- Do not put Alstom in an unlawful or an ethically questionable position;
- Avoid even the appearance of improper conduct;
- Do not engage in any situation that might cause a conflict or a perceived conflict of interest, e.g. a conflict between your personal interests and your professional duties;
- Do not make a decision that you would feel uncomfortable explaining to your colleagues, your family and your relatives;
- Do not make a decision that could damage Alstom's reputation.



The Alstom Integrity Programme

The Integrity Programme is being implemented and monitored throughout Alstom under the responsibility of the Chief Compliance Officer. It is built upon industry best practices in the field of ethics and compliance and regularly updated to help you as employees to act appropriately.

The Ethics & Compliance Instructions, rules and procedures are issued by the Ethics & Compliance Department, along with relevant training to promote the widest possible distribution within Alstom. Training can be undertaken either via face-to-face sessions or by e-learning.

How to obtain information and get answers to your questions

Alstom promotes peer commitment in which employees support one another to do the right thing. As employees, if you wish to seek guidance you may do so by discussing your issue with:

- Your Management;
- Your Human Resources or Legal contact;
- A member of the Ethics & Compliance Department;
- An Ethics & Compliance Ambassador;
- A member of Internal Control or Internal Audit Departments.

Employees can find detailed information in the following electronic resources:

- The Ethics & Compliance section on Alstom intranet.
- The Instructions on Alstom Management System (AMS).
- The Alstom internet website: <http://www.alstom.com/integrity/>

The Instructions must be complied with. They are regularly updated in line with the latest evolutions in Alstom and cover the following topics: Ethics & Compliance, Finance, Legal, Human Resources, Sourcing & Operations, Environment, Health & Safety, Communications and Information Systems and Technology. Based on our business and operational processes, additional policies and guidelines are available on AMS.

How to report a concern

Any employee, any person or third party may use the Alstom Alert Procedure, in accordance with the laws and regulations applicable in the country where they live or work, if they have reason to suspect a violation of the Code of Ethics or Alstom rules and policies.

The Alert Procedure provides employees with an alternative method for reporting potential violations if informing the direct manager could cause difficulties, or if it is believed that the reported irregularity will not receive the proper follow-up. The person wishing to report has the choice of reporting by:

Contacting any one of the following:

- The SVP/VP Region;
- The Region VP Legal & Compliance;
- The General Counsel:
Pierrick Le Goff
48, rue Albert-Dhalenne 93400 Saint-Ouen, France
pierrick.le-goff@alstom.com +33 1 57 06 87 42;
- The Chief Compliance Officer:
Michael Julian
48, rue Albert-Dhalenne 93400 Saint-Ouen, France
michael-a.julian@alstom.com +33 1 57 06 67 63;

Using the two new methods of communication, available 24 hours a day, 7 days a week, 365 days a year:

- The secure website: www.alstom.ethicspoint.com
- The toll-free hotline (dial-in numbers available on the secure website)

Every measure will be taken to respect employee confidentiality. Alstom commits that no employee will be subject to any form of retaliation, such as a change of status, harassment or any other form of discrimination, as a result of using the Alert Procedure or disclosing information in good faith.

Our fundamental principles

Respect laws and regulations

Alstom's reputation for integrity is built upon its respect for laws, regulations and such other requirements that apply to the conduct of business in all countries in which it is present. It is the personal responsibility of Alstom employees to know the laws, regulations and requirements relating to their job. Any breach of these laws and regulations may lead to civil and criminal prosecution. Activities which could involve Alstom in unlawful practices are prohibited.

Alstom is a multinational company with operations around the world. To ensure our high ethical goals, we require compliance with certain standards that exceed those required by applicable national laws and regulations. Among others, Alstom is attached to the spirit and the letter of laws governing human rights and labour, health and safety standards, environment protection, prevention of corruption, fair competition, taxation and the accurate communication of financial information. We comply with the guiding principles of the OECD, the United Nations Universal Declaration of Human Rights, the principles of the Global Compact and those of the International Chamber of Commerce (ICC).

Respect all Alstom rules and policies

In addition to the laws and regulations which apply to our business, Alstom has also implemented internal rules, instructions, guidelines and policies ("Alstom Rules") which govern the day to day activities of Alstom employees. All Alstom employees must comply at all times with the Alstom Rules. Any breach or non-compliance with the Alstom Rules will result in disciplinary action.



Prevent corruption and bribery

Alstom's policy is to prohibit all unlawful payments and practices. Alstom rejects corruption and bribery in all of its business transactions and is fully committed to complying with the requirements of the OECD Anti-Bribery Convention, French criminal law, the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010, and with all applicable laws and regulations in the countries in which it is present. Alstom also follows the voluntary standards of the International Chamber of Commerce (ICC) and the guidance of the "Resource Guide to the US Foreign Corrupt Practices Act". Anti-corruption laws exist in all countries and are generally designed to prohibit various forms of bribery and other corrupt practices. A breach of any of these laws is a serious offence which can result in heavy fines for companies and imprisonment for individuals. Even the appearance of a breach of these laws could damage Alstom's reputation and put employees at risk.

In particular, it is forbidden for Alstom's companies, employees, officers and directors, to offer, promise or provide any pecuniary advantage or any other advantage to any person with a view to improperly obtaining or retaining business, rewarding a decision or securing any facility or favour that infringes regulations. Nor can they respond to solicitations with the same objective. This applies whether the improper advantage is made directly or indirectly, including by requesting assistance from a third party, such as a sales partner, a supplier, a contractor, a joint venture or consortium partner.

Furthermore, it is forbidden for Alstom's companies, employees, officers and directors, to receive any kickback, which is a pecuniary advantage, or any other advantage, in return for a decision in favour of a third party.

For the purposes of the above prohibition, "person" means any public official, political party, employee or agent of a customer in the public or private sectors or employee or agent of a lending agency or bank. Public officials include, but are not limited to, public or government officials, agents, employees, or representatives, any political party or political party officials, agents, employees or representatives, candidates for public or political party office, members of public assemblies, officials and employees of international organisations, judges or officials of international courts, and employees of government controlled administrations and state owned companies.

Facilitation payments are used to facilitate mandatory administrative procedures and formalities normally carried out through proper legal channels. Such payments are petty corruption, and although they may be tolerated in some countries, they are illegal in many countries. To avoid any confusion, Alstom prohibits any such practices.

Alstom will not sanction an employee who complies with Alstom's rules by refusing any form of corruption and bribery, even if such a decision results in losing business or any other adverse commercial consequences.

LGL-WMS-010 - Gifts and Hospitality	LGL-WMS-015 - Managing Conflicts of Interest
LGL-WMS-011 - Political Contributions	LGL-WMS-016 - Preventing corruption with Suppliers and Contractors
LGL-WMS-012 - Charitable Contributions	LGL-WMS-017 - Preventing corruption in Joint Venture and Consortium
LGL-WMS-013 - Sponsorship	LGL-WMS-018 - Facilitation Payments
LGL-WMS-014 - Consulting Companies	LGL-WMS-020 - Sales Partners

Comply with competition laws

Competition is one of the essential conditions of a market economy. Competition law, also called anti-trust law in the US, ensures that companies compete fairly in the market. It is in Alstom's interest to operate in openly competitive marketplaces and to comply with all relevant competition laws. Heavy fines may be imposed on Alstom companies for breach of competition laws, and individuals may be liable for civil, labour or criminal sanctions, including possible imprisonment for any violations. In addition, third parties may seek to recover damages from Alstom in connection with alleged competition law breaches. Strict compliance with competition laws has real and tangible benefits: it promotes and encourages innovation, the manufacture of high quality products and consumer protection, and reinforces Alstom's reputation for integrity.

Alstom employees must not participate in any agreement with competitors that has the purpose or effect of fixing prices, distorting a bidding process, sharing markets or customers, limiting production or boycotting a customer or supplier. Alstom employees must not exchange commercially sensitive information with competitors in violation of the competition laws and must take particular care when participating in trade associations. Special responsibility must be observed when Alstom has a dominant position in a market, as described in the Alstom Instruction for Compliance with Competition or Antitrust Rules (LGL-WMS-007).

Because rules are complex and differ from one country to another, employees should consult their Legal Department for clarification as necessary.

LGL-WMS-007 - Compliance with Competition or Antitrust Rules



Play your role in internal control and disclosure of information

Every Alstom employee has an important role in the Internal Control framework.

The Internal Control framework is designed to provide reasonable assurance of the control environment to the Board of Directors, management, other personnel and to any stakeholders while ensuring that the processes lead to effective and efficient operations with reliability of finance reporting, compliance with Alstom Instructions and applicable laws, regulations and requirements.

The management is responsible for ensuring Internal Control in compliance with the Alstom's policies. The financial reporting compliance is ensured through several controls, including the application of accounting principles, policies, rules and procedures as set out in the Alstom Instructions, the Reporting and Accounting Manual, the Internal Control Manual, the sign-off of annual internal control questionnaire and directors' checklists. The integrity of our financial and business information is essential if we are to run our operations legally, honestly and efficiently, in compliance with applicable financial standards, such as the Generally Accepted Accounting Principles.

Alstom employees must manage, store, archive and destroy documents, books and records, in whatever form, according to applicable regulations and Alstom's Records Retention Policy and data privacy rules. Managers must ensure that the data recorded in the reporting system is fully in line with the information due to be published, with the results of the period and with the financial position at the end of the period.

At every level of Alstom, employees must ensure that any records, reports or information they use or communicate to the management enable Alstom to make full, fair, accurate and timely disclosure in reports, documents and other public communications.

These documents, in whatever form, include, but are not limited to, financial reports and projections, research reports, marketing information, sales reports, tax returns, expense accounts, time sheets, environmental and social information and other documents, including those submitted to governmental or regulatory authorities.

In no case should any financial or business records be subject to fraudulent treatment. Fraud, or the act or intent to cheat, steal, deceive or lie, is both dishonest and, in almost all cases, criminal. Fraud can include, but is not limited to: submitting false expense reports, forging or altering cheques, misappropriating or misusing the company's assets, unauthorised handling of transactions, large cash payments, mishandling petty cash or making an entry on records or financial statements that is not in accordance with proper accounting standards.

FIN-WMS-055 - Accounting principles and reporting
FIN-WMS-057 - Expenses approval and management
LGL-PRO-002 - Fraud and Theft Reporting and Investigation
LGL-WMS-005 - Retention of Original Documents
Reporting and Accounting Manual
Internal Control Manual

Our essential rules



Create business trust with our business partners

Customers

Alstom must treat all its customers honestly and fairly, regardless of the size of their business. We are committed to providing customers with high-quality products and services that meet their needs.

Alstom gives detailed information on its products and services in its advertising, public statements and offers to customers. If you negotiate contracts you must ensure that any statements, communications and presentations made to customers are accurate and truthful.

As Alstom employees, you must keep customer sensitive and private information confidential. You should disclose information relating to a project or contract only to people who need to know and who possess such information.

Suppliers and contractors

Purchasing decisions are based on an objective assessment of the supplier's or contractor's reliability and integrity and on the overall value of the offering, taking into account short- and long-term considerations and objectives.

In the best interest of Alstom, the purchase of goods and services must be based on merit, price, quality, performance, delivery, sustainable development and suitability.

As a purchaser, Alstom ensures that no situation of dependence is established with suppliers and contractors, and therefore systematically explores alternative and more favourable options. Relations with suppliers and contractors are governed by procedures set out by the Sourcing and Supply Chain and designed to ensure that all suppliers and contractors are treated equally.

All measures must be taken to avoid conflicts of interest and any appearance of partiality. As Alstom employees, you are forbidden to receive kickbacks whether in the form of money or otherwise, in return for making a favourable decision to particular suppliers and contractors. Alstom requires its suppliers and contractors to comply strictly with all applicable legal requirements relating to their activities and business environment.

Alstom requires its suppliers and contractors to sign its Charter for Sustainable Development, underpinned by respect for human rights, the prohibition of child labour, employee health and safety and ethical rules, in particular those relating to anti-corruption and competition compliance, environmental protection and compliance with applicable laws and regulations.

Alstom takes steps to ensure that these commitments are met, both during the selection process and during contract performance.

LGL-WMS-014 - Consulting Companies

LGL-WMS-016 - Preventing corruption with Suppliers and Contractors

SCG-WMS-023 - Indirect Sourcing - From Purchase Request to Purchase Order

SCG-WMS-011 - Sustainable Development Process

SCG-POL-001 - Sustainable Sourcing Policy

SCG-FRM-002 - Charter for sustainable development for Alstom's suppliers and contractors

Sales partners

Sales partners are third parties performing sales and marketing services in a defined territory relating to specific company activities, who may act for or on behalf of Alstom, and who may be in contact with Alstom's potential or existing customers or with any public or private authorities.

Alstom prohibits any bribery, public and private, and any unlawful or unethical practices in all aspects of a relationship with Sales partners. Any bribery or unlawful or unethical practice may expose Alstom to liability and damage its reputation.

To prevent public and private corruption, the use of Sales partners is subject to strict approval, to due diligence review by the Ethics & Compliance Department, and is governed by strict internal procedures contained in the Alstom Instruction for dealing with Sales partners.

LGL-WMS-020 - Sales partners

Government procurement

Contracts with government-owned or public entities often require compliance with very high and complex standards. Alstom complies with the laws and regulations that govern the acquisition of goods and services by governments in all its operations, including laws prohibiting attempts to influence government officials.

Alstom is committed to competing fairly, to being truthful and accurate and, when awarded a government contract, to performing it in accordance with all contractual and legal obligations. Where government contracts involve the possession, use of, or access to classified or otherwise restricted information, it is essential that Alstom employees strictly follow the security procedures applicable to such information.

Export controls and trade restrictions

Local, national or international laws, regulations or similar requirements establishing embargoes or other trade restrictions on goods, services, software or technology are enacted from time to time.

All Alstom companies must strictly comply with all such applicable export control laws of the countries in which they are present (including laws regarding technical assistance or training). Special care needs to be given for dual-use technologies and products, such as components, software and technical data, which can have an application in both the civil and military fields.

As Alstom employees involved in international trade, you must ensure that your activities comply with the latest applicable regulations and seek guidance from the Legal or Tenders & Projects Control Department. Failure to observe these laws and regulations could expose both Alstom and the employees involved to severe sanctions, including prohibition of future exports and criminal sanctions.

Anti-Money Laundering

Money laundering is the processing of criminal proceeds in order to disguise their illegal origin. In compliance with applicable anti-money laundering laws, Alstom conducts business with reputable partners and always verifies the origin of funds.

As Alstom employees, you need to be cautious with the manner in which payments are made to detect if irregularities may exist, and with partners who demonstrate suspicious behaviour in their operations. If anything about a proposed transaction does not feel appropriate or could violate applicable laws, regulations or Alstom's policies and procedures, raise questions with your direct manager, the Legal Department, the Ethics & Compliance Department, or the Finance Department.

Conflicts of Interest

Be it in your business or private life, nothing you do should conflict with your professional responsibilities in Alstom. Conflicts of interest distort judgement. As Alstom employees, you must avoid any situation which involves or may involve a conflict between your personal interests (or those of your family members or relatives) and those of Alstom. If you face a situation of conflict of interest or potential conflict of interest, you need to disclose it to your management.

To protect yourself and Alstom from actual or apparent conflicts of interest, you must not make or hold any investments or have directorship responsibilities in a supplier, customer, competitor, consulting company or any business partner if the nature of such investments may affect a business decision taken on behalf of Alstom or create the appearance of a conflict of interest.

You must not deal directly with a business partner who may be a customer, a supplier, a sales partner or any other third party, if you or your family members or relatives have an interest in such third parties.

You must also apply Alstom's rules with regard to the acceptance of gifts and hospitality from a third party so as not to be placed in a potential conflict of interest.

Care must be given to the hiring of former government employees or their family members. This needs to be carefully reviewed and approved by the Human Resources Department, in consultation with the Ethics & Compliance Department, as appropriate. Although some of Alstom's former public customers have been partially or wholly privatised, they may still be subject to the same or similar stringent rules.

LGL-WMS-015 - Managing Conflicts of Interest
HRM-PRO-008 - External Recruitment Process

Gifts and hospitality

Alstom aims to ensure that any business decision taken by its employees, customers or suppliers are made solely through the proper business channels — fundamentally based on competitiveness, performance and the quality of the products and technologies it offers — and that they are not driven by any form of personal improper advantage or conflict of interest.

Any gift or the granting of any form of hospitality cannot be made with the purpose or effect of obtaining an advantage of any kind or to influence the outcome of a business decision, in breach of the law, the recipient's obligations or the Code of Ethics or applicable Alstom Instructions. The same applies when receiving a gift or benefiting from a hospitality.

As Alstom employees, you must also not offer, accept or authorise a family member or relative to accept gifts, money, loans, invitations or any other form of special treatment from anyone involved in business dealings with Alstom, if the ultimate goal is to influence business decisions.

LGL-WMS-010 - Gifts and Hospitality





Assume a pivotal role in our environment

As a good and responsible corporate citizen, Alstom is keenly aware of the impact of its actions. It integrates environmental, social, human rights and consumer concerns into its business operations and core strategy in close collaboration with its stakeholders. Alstom applies these policies and standards in all countries in which it is present. As Alstom employees, you must contribute to these goals through your own conduct.

Environmental protection

Alstom has set itself the ambition, and given itself the means, to make a significant contribution to environmental protection through the systems, equipment and services it sells. The company's core activities are focused on providing technologies and solutions to significantly reduce emissions and greenhouse gases and limiting the use of scarce natural resources. Alstom communicates to its customers and all of its stakeholders relevant information on the environmental impact of its products.

Furthermore, Alstom designs its manufacturing, installation and service processes for minimum consumption of energy, eliminates hazardous products and favours materials that can be recycled. At all manufacturing sites and offices, and at our customers premises, the environmental impact is part of major decisions and is managed in line with the rules set out in the Environment, Health and Safety (EHS) policy.

As Alstom employees, you contribute to this collective effort in your day-to-day activities.

MNS-POL-003 - Environment, Health and Safety Policy

EHS-PRO-008 - Environmental Site Assessments, Asbestos Surveys Reporting Process

CSR Policy - December 2013

Community relations

As Alstom employees, you are encouraged to volunteer and play a role in your local community. Activities undertaken by yourself on your own initiative are done in your name and in your own time. Conflicts of interest are to be carefully avoided.

Community Investment policy

Political contributions and activity

Political contributions are subject to national laws which vary from country to country. Even when legally permitted in a country, such contributions can be a source of corruption or otherwise perceived as a questionable practice. Alstom prohibits any contributions, whether financial or in kind, to political parties or organisations, or to individual politicians on behalf of Alstom.

As Alstom employees, Alstom respects your rights to participate as individuals in your community and civic affairs. This must be done at a personal level, in your name, in your own time and at your own expense, consistent with applicable laws and regulations. The company's stationery, funds and other property must not be used for personal political activities. You need to carefully separate your own political activities from Alstom activities and avoid any conflict of interest or perception of a conflict of interest or illegal behaviour.

LGL-WMS-011 - Political Contributions

Charitable contributions

Charitable contributions made in Alstom's name or using its financial resources have to comply with applicable laws and regulations, be authorised by prior written approval and be properly recorded. The Ethics & Compliance Department may be consulted as appropriate. Contributions should have relevance to the community in which Alstom operates. You must keep proper written recordings of any decisions or actions taken.

LGL-WMS-012 - Charitable Contributions

Sponsorship

Sponsorship is part of the marketing and communication strategy. It is authorised in compliance with applicable laws and regulations and solely within the framework of Alstom Instructions.

As Alstom employees, you must submit any decisions to engage the company in any sponsorship to prior approval from the Communications Department. The Ethics & Compliance Department may be consulted as appropriate. You must keep proper written recordings of any decisions or actions taken.

LGL-WMS-013 - Sponsorship



Foster a team spirit

It is Alstom's policy to support and respect the protection of internationally proclaimed human rights, to fully comply with the United Nations Universal Declaration of Human Rights and with the International Labour Organisation's Fundamental Conventions. In line with these principles, Alstom applies a human resources policy based on fair treatment and respect for individuals, their dignity, rights and individual liberties and promotes them within the company. Discrimination of any kind is not tolerated. Alstom promotes all forms of dialogue with both individual employees and their representatives.

Respect of human rights

Alstom is particularly respectful of the laws governing human rights and labour. In addition to the above principles, Alstom's policy is also to follow the guiding principles on Business and Human Rights endorsed by the Human Rights Council; and to respect internationally recognised human rights wherever it operates. Alstom supports the elimination of all forms of illegal, forced or compulsory labour, in particular child labour. Illegal, forced, or compulsory labour at Alstom's suppliers and contractors is strictly prohibited.

Relationships with employees

Alstom respects the right of its employees to form and join trade unions and workers' organisations of their choice and to organise and bargain collectively. The social relations policy recognises that differences are a source of strength for the company. Alstom respects the role and responsibilities of the social partners and commits to communicating and negotiating openly to address issues of collective interest, providing the means to conduct their mission and not to prevent them from playing their role.

Career management for employees

As part of its people management strategy, Alstom promotes employee's development.

The People Management Cycle includes regular face-to-face discussions between employees and managers not only to define objectives and review achievements but also to address employee career aspirations and development needs as well as the Alstom's Values into Practice. Alstom is committed to promote internal mobility at all levels of the company.

HRM-PRO-006 - Internal mobility process

HRM-PRO-007 - Performance management and people review

Equal opportunity and diversity

Alstom does not tolerate any form of harassment, coercion or bullying whether sexual, physical, psychological or otherwise.

The recruitment, training and personal development of employees from different backgrounds is an important asset for Alstom. The company recognises and values these differences by building teams that reflect the markets and communities in which it operates. The company commits to offer equal employment opportunity to all qualified employees and applicants.

As Alstom employees, you must comply with all laws and regulations forbidding any discrimination with respect to age, race, gender, ethnic origin, nationality, religion, health, disability, marital status, sexual preference, political or philosophical opinions, trade union membership or other characteristics protected by applicable laws and regulations.

If you observe or experience any form of abuse, you can report it to your HR management. No adverse action can be undertaken against you for making such a report in good faith. The recruitment process is exclusively based on the applicant's qualifications and skills. Remuneration is determined on the basis of the employee's contribution to Alstom.

HRM-POL-005 - Equal employment opportunities and diversity

Health and safety

Alstom is committed to providing a safe and healthy work environment at all its sites, offering the same high standards wherever it operates. These standards are set out in the Environment, Health and Safety (EHS) policy and apply to employees and contractors working at Alstom's sites, or under Alstom's supervision at customer sites. A specific effort is made to reduce the number of accidents to zero by applying a strong attention to high-risk activities. This is supported by intensive training of managers and employees and a zero tolerance for deviation from these standards.

Measures to eliminate any risk related to health and safety issues are applied at all sites and throughout every project. These measures are implemented in partnership with the relevant Alstom bodies and committees.

MNS-POL-003 - Environment, Health and Safety Policy
EHS-PRO-007 - Alstom Safety Directives and Zero tolerance to deviation policy
EHS-PRO-023 - EHS – Reporting Process and Responsibilities
EHS-PRO-008 - Environmental Site Assessments, Asbestos Surveys Reporting Process
EHS-PRO-009 - Asbestos Elimination – Exposures Control & Minimisation

Security of employees

Alstom does its utmost to protect its employees wherever they are working. Alstom issues regular instructions to inform people of risks and sets out procedures to be followed, such as in the event of unstable political situations or criminal acts.

As Alstom employees, you should keep yourselves informed of these regularly updated instructions, particularly with regard to business travel.

SEC-PRO-001 - Security organisation
SEC-WMS-003 - Travel to or staying in a sensitive country

Data privacy

Alstom and each of its employees must be particularly attentive to laws and regulations concerning privacy and protection of information concerning individuals, employees or third parties, and comply with them.

Alstom does not communicate personal information to third parties, except to the extent necessary and permitted by applicable laws or regulations.

As Alstom employees, you may have access to another person's personal data only if your function and responsibility specifically include the handling of personal data. The right of access is restricted according to the nature and scope of the individual function and responsibility.





Protect Alstom's assets

Alstom's assets are not only physical or tangible items (such as funds, supplies, patented inventions, intellectual property or computer and telephone networks); they also include intangibles (such as ideas, concepts or know-how) which employees develop in the course of their work for Alstom. In addition, assets cover customer and supplier lists and other market data, along with any information to which employees have access as a result of their work responsibilities.

As Alstom employees, you should do your utmost to protect the company's assets. Alstom's funds and assets must not be used for illegal purposes or for purposes not related to the Alstom's activities.

You should not appropriate any of Alstom's assets for your own use or make them available to others for a non-Alstom use. You must not use Alstom's assets for personal business or personal gain, nor may you allow any other person not employed or authorised by Alstom to use them. Misappropriation or theft of these assets may give rise to sanctions and may constitute a violation of law, giving rise to civil action or criminal prosecution.

Communications resources

The communications resources — email, voicemail, internet, telephone (including mobile phone) and other means of communication — are the property of Alstom and are to be used for professional purpose. For personal devices connected to Alstom Information Systems, Alstom remains the legitimate owner of the professional data located on the user's personal device. When the user is leaving Alstom, professional data shall be wiped from the device by Alstom.

The use of communications resources is based on the recognition that private and business lives are closely linked and that the right balance between the two is beneficial to Alstom and its employees. However, such use should be limited to what is reasonable and necessary in the circumstances.



Respect for confidential information

During the performance of your duties, as Alstom employees, you may have access to confidential and proprietary data relating to Alstom's business activities, including information on customers and suppliers. Employees with such access must only be those whose function and responsibility specifically include the handling, use and communication of such data. The right of access is restricted according to the nature and scope of the individual function and responsibility. Moreover, in the event that you come into possession of confidential or proprietary information, you must keep such information confidential and use it only for authorised purposes. Your obligations with respect to such information continue beyond your term of employment.

Examples of confidential information include, but are not limited to, results, forecasts and other financial data, human resources and personal data, information with respect to acquisitions and divestitures, new products and orders.

Examples of proprietary information include, but are not limited to, business strategies, product improvements, technical information, systems, inventions, trade secrets or know-how developed or acquired by Alstom.

The definitions include matters covered by secrecy and non-disclosure agreements.

You may, during the performance of your duties, experience fraudulent attempts of extortion (money, confidential information). If you are not sure whether you can properly disclose confidential information or act on information in your possession, consult the procedure in the Security Instructions/Data Protection chapter and seek guidance from your manager.

Golden Rules of Data Protection
Data protection during travels
Extortion of money and/or information

Intellectual property

Alstom's intellectual property rights which include, but are not limited to, patents, rights in inventions, rights in designs, trade marks, trade and business names and all associated goodwill, rights to sue for passing off or for unfair competition, copyright, moral rights and related rights, rights in databases, domain names, rights in information (including know-how and trade secrets) and all other similar or equivalent rights, subsisting now or in the future, in any part of the world, in each case whether registered or unregistered and including all applications for, and renewals or extensions of, such rights for their full term, are one of its most valuable assets, and are therefore protected by law, whenever possible.

As Alstom employees, you have a duty to safeguard these assets. Alstom ensures that the valid intellectual property of others is respected and is not infringed by its employees.

IPD-WMS-006 - Trademark protection and management



Insider dealing

In the normal course of business, as Alstom employees, you may have access to information that can affect the value of shares, options or other securities, if such information were to become public. Since Alstom is a publicly quoted company, it is subject to the securities laws and regulations of several jurisdictions which regulate the use and disclosure of information to the public.

Information which may affect the value of Alstom's shares, options or other securities is considered insider information and must be kept confidential until publicly disclosed by the company. Acting on this information for personal gain or disclosing it to anyone else before it has been officially released is likely to violate securities laws and violates Alstom policy. Penalties for violations are severe and can include fines and imprisonment.

This rule also applies to confidential information concerning other companies, including customers, suppliers and any business partner, listed on any stock exchange, should you have non-public information concerning that company.

LGL-WMS-008 - Insider Dealing

Communication with analysts and/or investors

The Investor Relations Department is responsible for all financial communications with analysts and investors. Any communication from an analyst or investor requesting information relating to Alstom should be forwarded to the Investor Relations Department, which will handle the matter.

Any Alstom employee invited to participate in events or meetings attended by investors must notify the Investor Relations Department in writing and obtain its prior written authorisation before accepting the invitation.

Communication with the media

Alstom develops active communications to reinforce its image among customers, opinion leaders, analysts, investors, the public and stakeholders. Alstom is a publicly quoted company and any communication with the media or analysts may affect Alstom's image or reputation and must be carefully reviewed and controlled.

Media relations are the responsibility of Communications Department. All statements to the media or responses to inquiries from the media must be exclusively handled through the Communications Department or coordinated with it.

Use of social networks

As Alstom employees, you must use external and internal social networks conscientiously, even when doing so in your personal capacity. You must avoid the transmission of messages that are considered as confidential and proprietary information, or which could be viewed as insulting, offensive or demeaning to individuals or to the company. In addition, you must in all cases respect data privacy regulations when posting pictures of individuals or groups.

COM-WMS-013 - Using social media channels to communicate about Alstom



ALSTOM – CODE OF ETHICS 2016. © ALSTOM SA, 2016. All rights reserved. ALSTOM, the ALSTOM logo, all alternative versions and all mentioned trademarks of ALSTOM's transport activities, are the brands and trademarks of ALSTOM SA or ALSTOM Transport Technologies. The other names mentioned registered or not, belong to their respective owners. Technical and other forms of data contained in the present document are given for the purposes of information only. ALSTOM reserves the right to reconsider or change this data at any time and without warning. Copyright registration: 1st quarter 2016. The articles and illustrations published in this issue may not be reproduced without prior written authorisation. Design-Production: **tmpp**worldwide. Photo credits: Photographs: © Alstom/E. Lamperti, TOMA/C.Sasso/P. de Salabert. TOMA/C.Sasso - Arnaud Février - UK Power Communications. TOMA/C.Sasso - S.Dhote - Bernd Rosenthal - P. de Salabert, TOMA/C.Sasso, TOMA/F.Christophorides.

Alstom

48, rue Albert-Dhalenne

93482 Saint-Ouen Cedex

Phone: + 33 1 57 06 90 00

Fax: + 33 1 57 06 96 66

www.alstom.com

www.alstom.com

The ALSTOM logo consists of the word "ALSTOM" in a bold, blue, sans-serif font. The letter "O" is replaced by a red circle with a white horizontal line through its center, resembling a stylized eye or a train wheel.