

	Community Investment and Country Community Action Plans	Document Reference: CSR-PRO-001 version A	Application date : 23 Nov 2018
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L: Can be localized / Adapted

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Purpose / Objectives

The purpose of this Procedure is to standardize the implementation of the company's Community Investment actions in all those countries in which it has a major presence. This will then facilitate the consolidation of the company's community-related activities to give a global picture for the purposes, inter alia, of Year End reporting.

Rationale

In order to be a catalyst for development, corporate philanthropy and community engagement programs need to be well managed. Creating value for both beneficiaries and stakeholders requires Alstom to have a clear direction and focus for guiding its philanthropic activities and for measuring their effectiveness from a cost/benefit perspective.

Alstom has put in place a philanthropy and community engagement strategy spanning all the countries in which it has a major presence – typically those with more than 200 employees. Its priorities are aligned with Alstom's business drivers. Such alignment will allow the company to leverage its strengths, its brand and its employees to have the maximum impact on the beneficiaries.

The Country Community Action Plan (CCAP) Template (attached) is the key tool to support this process, allowing the actions to be planned, monitored, recorded and assessed.

Alstom's collective community investment activities, whether undertaken under the auspices of the Alstom Foundation or the CCAP, are referred to under the banner of **Alstom in the Community**. Alstom Foundation activities, whilst separate, are included in the CCAP in order to have a complete overview of all of Alstom's community investment activities within a country.

The activities must be aligned with our Community Investment Policy with its three axes: **meeting social needs; supporting education; cultivating local enterprises**. The primary direct beneficiaries of the initiatives must be the local communities, and not Alstom or its employees.

Scope of application

This Procedure covers the selection, preparation and implementation of activities under the Country Community Action Plans (CCAP) of each country in which Alstom has a major presence (typically those in which the headcount is above 200).

Responsibilities for the execution of this procedure

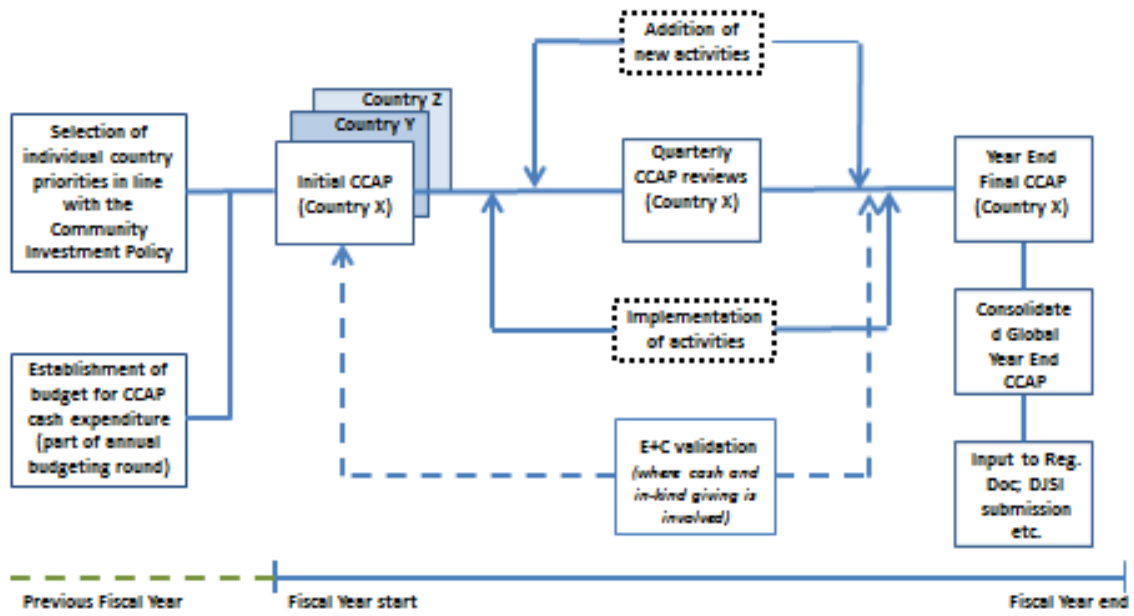
Accountable: The Director – Community Investment at company HQ.

Responsible: The nominated CSR Champion in each country in which Alstom has a major presence.

Players: This is not function-specific. It involves willing volunteers from anywhere within the company.

Activities Flow chart

Country Community Action Plan Process



Person in charge	Action	Comments	Applicable documents/rules
Country CSR Champion	Collects + develops ideas/proposals for community activities from sites and other sources	In some countries, especially those with multi-sites, small volunteer committees have been established	Community Investment Policy
Country CSR Champion	Secures local management team buy-in for the selected actions and beneficiaries	Countries to define the types of activity they wish to prioritise and the NGOs/Charities they wish to support.	
Country Management Team	Validate the strategic local community investment priorities and the CCAP and overview its deployment	On a quarterly basis throughout the year	CCAP Template
Country CSR Champion	Preparation of initial CCAP and regular update as new ideas for activities come forward and receive approval		CCAP Template
Regional Compliance Officer	Checking and validation of the initial CCAP and potential additional new activities during the fiscal year	E&C checks as mentioned in the Instruction for Charitable Contributions LGL-WMS-012	Company rules for donations to charities : Alstom Instruction for Charitable Contributions LGL-WMS-012 and the applicable DoA
Country CSR Champion	Implementation of CCAP activities	Implementation of individual activities may be delegated to volunteers	
Director – Community Investment or Region CSR Champion (as appropriate)	Coordination of Quarterly Reviews	To monitor progress and to help transfer best practice from one country to another	
Country CSR Champion	Preparation of final Year End CCAP recording what was actually done in the Year, and assessing the resources used and the benefits		CCAP Template
Director – Community Investment	Consolidation of all the CCAPs into a global Year End picture		CCAP Template
Director – Community Investment	Preparation of relevant sections of the Registration Document; the DJSI submission etc.		

Activities description

Section 1 – Community Investment Policy

The Community Investment Policy is as follows:

Alstom contributes to economic development and social progress not only on a large scale, via its infrastructure projects and technologies, but also with a “Community Investment Policy” aiming to support communities around its factories and work sites throughout the world.

In addition to the hiring of employees, their training in professional skills and the development of a local supply chain, we aim to improve the living conditions of the people around our sites by making available know-how, competencies, tools, locations and means.

Our Community Investment Policy is focused on three priorities:

Our top priority is to ensure pragmatic dialogue with local communities in order to answer local social needs and protect the environment. We encourage our own employees to support these actions as volunteers.

Our second priority is Education, a key development enabler everywhere in the world. We join forces with local schools and universities to train students in high-quality courses via scholarships, apprenticeships, internships, and by other educative means.

Our third priority is to contribute to local development and industrial activities. For example, we support small enterprises and innovative start-ups, strengthen our suppliers’ skills and develop programmes related to technology and innovation.

With Alstom, local communities can improve their economic development and living conditions.

Section 2 – Preparation of the initial CCAP for the year

The Country CSR Champion defines and validates with the local management the priorities that are the most relevant for the country in line with the company’s Community Investment Policy. These priorities should be reviewed on a yearly basis as a minimum.

The CSR Champion in a country has the task to gather together ideas on a range of activities that could be undertaken in the country. Depending on the headcount and footprint of Alstom within the country, these ideas may come from individual employees or from volunteer community investment committees established at different sites.

The CSR Champion should then review and validate these ideas with the Country Management Team in order to select those activities that it would wish to support, consistent with local expectations and culture and the available resources and budget. Not all activities necessarily require cash expenditure. Those that do not should be prioritized. Initiatives requiring budget can be submitted as projects to the Alstom Foundation if in line with the Foundation’s key axes. Alternatively, they may be funded by the local budget as per the finance 3YP instructions.

For all actions in the field of charitable donations, such as partnerships with NGOs, the Regional Compliance Officer must be involved to perform the appropriate checks and validate from the compliance perspective both the initial CCAP and any activities that may subsequently be added to it during the fiscal year. The validation should be requested by the CSR Champion and evidence of approval should be saved. Only community investment initiatives that are included in the CCAP will be granted approval by the Sustainability & CSR Vice-President under the Delegation of Authority (DoA) rules.

Once the selection has been made, the CSR Champion prepares the initial Country Community Action Plan in using the CCAP template and reviews it with the Director – Community Investment. It is a first statement of the community investment activities Alstom proposes to undertake during the year. The CSR Champion sends the final version to the E&C Department for information.

Section 3 – Quarterly Reviews

The CCAP is a living document that will evolve during the year as initial activities are implemented and new ideas come forward. Some initial activities may not materialize and may be replaced by others. The Regional Compliance Officer must be involved to check and validate those changes.

The Country CSR Champion organizes quarterly reviews of the CCAP deployment with the local management committee,

The Director – Community Investment has the role to organize quarterly reviews of the CCAP with the CSR Champion in each country, involving the Region CSR Champion where one exists, in order to check that it is on course; to verify what has actually been done; and to communicate on good activities (best practice) from one country which could be read across to others.

This role may be delegated the Region CSR Champions where they exist.

Section 4 – Implementation of activities

It is the role of the CSR Champion to ensure that individual activities on the CCAP actually take place and are successful. This role, in relation to any single activity, may be delegated to another Alstom individual or group of individuals willing to take it on on a volunteer basis. Once an activity has been undertaken, the CSR Champion or his/her delegate must assess i) the resources that Alstom applied to the activity ii) the benefits to Alstom of having undertaken the activity and iii) the benefits to the direct beneficiaries of the activity. Wherever appropriate, the CSR Champion/delegate ensures, with support of the local Communication manager, that a successful activity is widely communicated within the company using the available media: Press Release; Teams Flash; Chatter; Teams Online etc.

Section 5 – Volunteering as part of CCAP activities

Alstom encourages its employees to support its actions in the field of Community Investment as volunteers.

Country management teams, catalyzed by the country CSR Champion, are encouraged to establish a volunteering policy which is appropriate to local needs.

Whilst the preference should be to support volunteering activities which take place outside of the normal working day, country management teams are free to allow employees, either individually or collectively, up to a maximum of one paid day per year each to undertake volunteering activities if they deem it appropriate. This allowance is to be within a threshold of total man-days/year for the employees in the country as a whole. This threshold should be set by the country management team, which is also responsible for verifying that each beneficiary organisation to be supported by volunteering is ethically sound and that its activities are consistent with the axes of the Community Investment Policy. A process for request, verification, approval and follow-up should be established locally.

Examples of the sort of support that the company could provide to volunteers include the following:

- Coordination of the arrangements for Alstom employees to take part in a sporting event on behalf of a charity – payment of participation fees; provision of transport to and from the event; provision of refreshments and T-shirts
- Coordination of the arrangements for an Alstom team to undertake a specific activity on behalf of a beneficiary organization (e.g. a charity; an NGO; a local school) e.g. painting a school room – provision of transport; materials; equipment; refreshments
- The use of company assets such as vehicles or Alstom space for charitable activities e.g. i) the gathering and distribution of clothes; toys; books; food, ii) the holding of fund-raising events
- Supporting the volunteering activities of individual Alstom employees in respect of their chosen beneficiary organisations through the provision of time-off; awareness raising amongst colleagues; use of Alstom facilities; logistical and other support

All volunteering activities will be captured by the country CSR Champions in the Country Community Action Plans such that the extent of the Alstom involvement and the resulting benefits to the beneficiaries may be quantified.

Section 6 – Year End actions

By the end of February the CSR Champion must prepare, using the CCAP Template, a definitive statement of the community actions undertaken by the company in the country during the fiscal year. Activities planned for March may be taken into account. Using this total picture the CSR Champion must assess what proportion of the initial budget has actually been used. The Year End CCAP will be reviewed with the Director – Community Investment and the Region CSR Champion (where appropriate), and will be communicated to the E&C Department for information.

The Director – Community Investment then has the role to consolidate the inputs from all the countries with a CCAP in order to have a global picture of all the community investment activities undertaken by the company during the year. Armed with this he/she will prepare the relevant inputs for the annual reporting process.

A – Definitions and References

A-1 Definitions

For the purpose of this document the following definitions shall apply:

- CCAP Country Community Action Plan
- **CSR Champion** The person nominated by a Country or Region to take the lead role on community investment activities on its behalf

A-2 References

The following documents are referenced through the text.

A-2.1 Parent documents

- [P1] Community Investment Policy. Link:
https://alstomgroup.sharepoint.com/sites/TrSustainability_Community/SitePages/Home.aspx
- [P2] CSR-MNL-001 Corporate & Social Responsibility

A-2.2 Child documents

- [C1] CSR-TEM-001 CCAP Template.
https://alstomgroup.sharepoint.com/sites/TrSustainability_Community/SitePages/Home.aspx

A-2.3 Other documents

- [O1] **LGL-WMS-012** **Instruction for Charitable Contributions**

A-3 Records generated and maintained

During the normal application of this Instruction the following records will be generated and maintained:

Record Name	Form number	Record type	Access	Location	Owner	Validating Function	Retention Time
CCAP	N/A	Plan	Restricted	By Country	CSR Champion	CSR	1 year

B – Control Sheet

Version	Date	Content of Modification	Author(s)
A	23Nov2018	First issue.	Barry HOWE