

# ETHICS & COMPLIANCE POLICY

11-2019



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 each and everyone's responsibility.

As expressed by our CEO in the Sustainability and CSR Policy, E&C underpins all our activities. 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, it is our responsibility to ensure that each and every one behave in full compliance with all laws and regulations.

In order to do so, we are supported by dedicated compliance instructions and an independent E&C team responsible for their implementation, together with the identification and proposal of new measures to adapt to a constantly evolving regulatory landscape.

To support the E&C team, we must all play our part by promoting a culture of compliance within our teams, actively 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 responsible.**

**Inge DE VENTER**

Chief Compliance Officer

## 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;
  - Prohibition of facilitation payments and other forms of corruption;
  - Working with sales partners;
  - Relations with JV and consortium partners;
  - Working with suppliers and professional advisors;
  - Sponsorship and charitable activities;
  - Prohibition of political contributions.
- To **comply with anti-trust laws** in relations to the operations of the Company.
- To **ensure the protection and proper processing of personal data of employees and third parties** in line with data privacy regulations.
- To **comply with applicable international sanction regimes and export control regulations** related to the activities of the Company.
- 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 and to ensure that appropriate disciplinary actions are taken against any employee who violates the E&C rules.
- To **maintain autonomy and independence of the E&C Function** by ensuring a direct access to the CEO and the Ethics Compliance and Sustainability Committee of the Board.