
POLICY INFLUENCE

July 2020

As a global leader evolving in a complex environment, Alstom has always placed integrity, reliability and responsibility at the heart of its actions and values. This commitment is underpinned and driven by a strong culture of ethics and compliance and the initiatives that stem from it.

Relation with governments, international organisations and think tanks

Alstom is driven by innovation and develops railway systems which are more efficient to operators (smart maintenance, cybersecurity, optimised ownership cost); more attractive to passengers (on-board experience, connectivity, real-time info); and more integrated with other transport modes.

Alstom supports Trade associations and activities that align with its business strategy and values. Alstom's main policy priorities are access to sustainable transport and industrial development of our solutions.

Access to transport is an essential factor of social progress and economic development. Alstom's mission is to support the transition to inclusive, environmentally friendly, safe and efficient transport. Our sustainability approach is driven by strong convictions:

- To be below the 2°C target, curbing global emissions from transport,
- Efficient and zero emission mobility solutions shall be the backbone of sustainable transport systems,
- The benefits of rail in terms of energy efficiency, local air pollution, safety and urban space optimization, make it a credible alternative to road,
- Decarbonisation of all transport modes via the use of 0-emission technologies (electricity for road and hydrogen for rail).

Alstom does not make any political contributions. According to our Code of Ethics, "Political contributions are any payments made to a political party, organization, a politician or a candidate running for office. A payment can be anything of value including goods, services, gifts, loans, funding of a political meeting or event, an advertising campaign, or anything of value provided to a politician, political party or political organization such as use of company office space, computer equipment or stationary". Alstom prohibits any political contributions. This prohibition is further ratified by Alstom's CEO, General Counsel and Chief Compliance Officer through the Ethics and Compliance Policy (November 2019).

It should be noted that Alstom respects its employees' rights to participate as individuals in their communities and civic affairs. However, it must be done at a personal level, in their own name, their time and at their expense, consistent with applicable laws and regulations.

For more information, visit

- [Alstom's Code of Ethics](#)
- [Alstom's Ethics and Compliance policy](#)

European Union

As a historical and a global leading player in the field of mobility, Alstom is involved in professional associations gathering private companies from all sectors and aiming at:

- Promoting the role of the industry for economic and social development at France and EU levels,
- Sharing best practices,
- Raising awareness on sustainable development.

Transparency register of the European Union

Alstom joined the European Union’s Transparency Register in 2009. It allows for public scrutiny, giving citizens and other interest groups the possibility to track the activities of registrants, who are bound by a common Code of Conduct.

For more information, visit the [Transparency Register](#)

Alstom France is also fully involved in the transparency of its relationships with public institutions and declares every year to the High Authority for the transparency of public life (HATVP) the details of its relationships with public authorities, which are fully in line with the French legislation.

For more information, visit the [HATPV website](#)

Monetary contributions to international and French advocacy and trade-associations

	2016	2017	2018	2019
Advocacy	107 650 €	39 500 €	141 500 €	223 172 €
Trade associations	926 921 €	1 051 102 €	990 088 €	1 058 490 €
Total financial contributions	1 034 571 €	1 090 602 €	1 131 588 €	1 281 662 €

United States

Alstom advocates for public policies that improve passenger and freight rail systems in the United States. As a global technology leader in public transport, public officials frequently ask Alstom for its views on passenger and freight rail policies. The company also has regular engagement with public officials representing Alstom's U.S. sites on constituent issues of shared concern.

Alstom does not make contributions to political parties, politicians or political organizations in the United States. Though U.S. law allows companies to make such contributions, Alstom maintains strict compliance with its global policy and does not.

Alstom maintains strict compliance with the following principles in all advocacy:

1. All applicable lobbying laws and regulations must be complied with fully;
2. All lobbying must advance sound public policies and consider impacts on all interested stakeholders;
3. Only Alstom employees who are registered lobbyists can lobby on behalf of Alstom;
4. Gifts, entertainment or hospitality to public officials must be made in strict compliance with applicable anti-corruption laws and regulations, Alstom policies, and other regulations and codes (e.g., internal policies of the policy maker); and
5. Outside lobbyists are strictly limited, subject to stringent approval and thorough due diligence by the Ethics and Compliance Department and bound by contract to a defined scope of work; anti-bribery provisions and commitment to comply with all local regulations.

Alstom makes public filings quarterly to the U.S. Congress, New York State Joint Commission on Public Ethics and LA Metro Ethics Department reporting any lobbying activity.

Alstom retains membership in approximately 20 external groups in the United States representing stakeholders in the rail sector and general business community. These organizations include trade associations (representing both rail suppliers and rail operators) and broad rail stakeholder coalitions. These groups build public policy consensus on key rail issues and advocate in support policies that advance rail service in the United States.

Group Main contributions

The following table shows the group's main contributions to industry specific organisations.

Trade Associations and others	2019
Fédérations des industries ferroviaires (FIF) - FIF brings together close to 300 member companies representing the whole spectrum of railway equipment industries	500 000€
UNIFE - UNIFE represents more than 100 leading European train builders and rail equipment suppliers	348 900€
Associations Françaises des Entreprises privées (AFEP) - AFEP – the French Association of Private Enterprises – represents 113 of the largest private corporations operating in France	70 000€
Union International des Transports Publics (UITP) - UITP is the International Association of Public Transport, a worldwide network to bring together all public transport stakeholders and all sustainable transport modes.	54 600€
Hydrogen Council - The Hydrogen Council is a global initiative of leading energy, transport and industry companies with a united vision and long-term ambition for hydrogen to foster the energy transition.	50 000€
International Transport Forum (ITF) - The International Transport Forum at the OECD is an intergovernmental organisation with 60 member countries. It acts as a think tank for transport policy and organises global dialogue for better transport.	50 000€

N.B. : main contributions amongst international, French and US advocacy and trade associations