

E&C POLICY: BUSINESS ETHICS & COMPLIANCE

"Committed to a fairer world"

September 2019

OUR E&C AMBITION

Our ambition at SYSTRA is to be the signature team for transportation solutions. This ambition cannot be achieved without business ethics & compliance (E&C). Providing clear guidance to our employees and working with our customers and business partners to promote ethical business practices can bring a fairer world through our transportation projects.

OUR OBJECTIVES

We are convinced that becoming a leading signature in the fight against corruption, fraud, anti-competitive and coercive practices, will allow us to:

- Attract reliable customers to grow a sustainable business
- Generate investments and build strong relations with trustful partners sharing our vision of ethics
- Enhance employee confidence in SYSTRA, increasing motivation and attractivity

OUR COMMITMENTS

The role of each of us at SYSTRA Group is to undertake to contributing, individually and collectively, to be:

ENGAGED

- **Believe in the importance** of E&C at the heart of our business and proactively **champion** E&C
- **Get involved in deployment** of the E&C programme
- **Embody 'Signature Team'** in terms of E&C

EXEMPLARY

- **Know the rules** (documentation & trainings) of the E&C programme and apply them on a daily basis
- **Be honest and work by setting an example** for teams, colleagues and business partners
- **Learn continuously** the ethical risks and **remain vigilant** about your daily conduct

PROMOTER

- **Circulate the rules** of the E&C program to teams, colleagues and suppliers
- **Communicate strong messages** to partners and customers
- **Raise any new ideas** for improving the E&C programme

CONNECTED

- **Report alerts** to a manager, the hierarchy and/or the Group Compliance Officer
- **Inform the ethics team** through regular reporting on ethical indicators/results
- **Share good practices and share feedback** on the subject

Let us engage in the deployment of this policy to become a signature team in E&C!



Andrew Mc Naughton
Chief Operating Officer



Bruno Schmitt
Chief Finance &
Administration Officer



Jean-Charles Vallery
Chief International &
Development Officer



Pierre Gosse
Chief Technical Officer



Pierre Verzat
Chief Executive Officer

