



Sector: Gas, Water & Multiutilities

Employees: 1,500

Criteria 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption.

Description and implementation process:

The Group put in place a Code of Behaviors and Actions as early as 2003. This aims to describe the eight ethical commitments which all employees have a duty to comply with. Commitments 7 and 8 were developed in 2008 jointly with Transparency International France. Through these values, the Group reaffirms its zero tolerance of corruption, and ensures that all its employees abide by the rules. The Code is issued to all salaried workers. As well as making ethical behavior and compliance with the law and international conventions the fundamental rule governing how we do business, Séché Environnement has also implemented a whistleblowing procedure. This is a tool which aims to guide and inform staff members if they ever encounter difficulty in interpreting the rules contained in the Code, or if they have any doubts as to how they should be applied in a given situation.

Whistleblowing is also something we can use to detect non-compliance with laws and regulations, or to reveal cases of behavior likely to seriously threaten the operating rules of society in general.

A whistleblowing alert can be made via a dedicated e-mail address. Following a whistleblowing alert, the person originating the alert is protected by a confidentiality agreement.

Challenges encountered and response(s) provided:

Séché Environnement being a mid-size company whose activities are mainly based in France, its resources do not need to deploy a dedicated service to lead internal audits and large-scale management missions. However, at its level the Group educates, prevents and gives rules of conduct to all employees.



Impact and results:

Since the creation of this ethical code, when inducting and integrating new employees, the Human Resources Department deliver a copy of the Code of Behavior and actions at the same time as the contract of employment.

Links to reference documents / Links for more information:

Link to "Code de comportement et d'actions": [Click here](#).

Link to "Eléments d'informations requis pour le reporting développement durable dans le cadre du GRI": [Click here](#).



Sector: Oil Equipment, Services & Distribution Employees: 9,115

Criteria 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption.

Description and implementation process:

Since 2013, CGG has carried out an audit of its anti-corruption program to evaluate its effectiveness and identify new steps of progress.

This external and independent audit allows us to evaluate the successful implementation of the anti-corruption program in compliance with the MAZARS-ADIT® framework. The audit covers all the major challenges linked with the prevention on corruption as well as the legal compliance to national and international legislation.

The control and evaluation carried out using the industry-recognized Best Practices concentrates on five major areas:

- Control environment: company culture, involvement of top management, awareness-raising and commitments linked to fighting corruption;
- Risk evaluation: identification and assessment of corruption risks and communication of the results of these assessments;
- Control activities: prevention and detection of potential corruption associated with commercial consultants, gifts, invitations and events, charity work, facilitation payments as well as donations to political parties (unauthorized by CGG);
- Monitoring: regular follow-up of incidents and methodology of controls pertaining to the fight against corruption;
- Information and communication: internal employee communication on policies and recommendations and awareness programs.

Challenges encountered and response(s) provided:

Here is a case study that illustrates our control environment and a practical application of our anti-corruption program. Recently CGG needed to recruit a commercial consultant in a North African country. The sales manager suggested two possible candidates. One of these two people requested to be paid in advance by cash payment in a tax haven. The Head of Legal, in charge of deploying the anti-corruption program, refused that the sales manager pursue preliminary discussions with this candidate. This intervention was justified by the CGG General Instruction on the subject of the selection and follow-up of commercial consultants and the 'red flags' therein described.

Impact and results:

The external audit of the CGG anti-corruption program allowed us to obtain a solid evaluation of the implemented measures.

In May 2014 (for the end of the 31 December 2013 exercise), CGG received the moderate assurance report, "the Anti-Corruption Certificate", in which no major discrepancies have been noted between the CGG Anti-Corruption Program and the Mazars-ADIT Anti-Corruption Framework. Specific aspects of the program were nonetheless identified as areas for future development. The actions initiated in all of these areas were for the most part carried out to completion. The certification process for renewal is currently in progress for the exercise ending 31 December 2014 and will integrate additional subsidiaries/countries of the Group.

The anti-corruption certification by Mazars-ADIT is approved and recognized by independent experts as well as the French Central Service for the Prevention of Corruption (SCPC), an interministerial structure.

Links to reference documents / Links for more information:

Link to MAZARS-ADIT® assurance report : [Click here](#).



THALES

Sector: Aerospace & Defense

Employees: 61,000

Criteria 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption.

Description and implementation process:

The Thales corruption risk prevention programme was certified by the consultancy Mazars and by ADIT. The ADIT/Mazars benchmark is compliant with national and international laws and regulations concerning the fight against corruption (French law, the United Kingdom Bribery Act, the United States Foreign Corrupt Practices Act (FCPA), the OECD Anti-Bribery Convention on Bribery of Foreign Public Officials in International Business Transactions), the tenth principle of the United Nations Global Compact and best practices in terms of anti-corruption procedures.

Furthermore, this benchmark is compliant with the standards of the International Federation of Accountants (IFAC) declining more than 200 control points.

This important work has been completed by a plan of audits, tests and interviews within the Group perimeter.

Impact and results:

The Thales anti-corruption certification by ADIT-Mazars constitutes an important recognition of transparency, effectiveness and continuous improvement of the strategy implemented by the company for several years.

Links to reference documents / Links for more information:

Link to « Ethique et conduite responsable » : [Click here](#).

Link to « L'intégrité, au cœur de nos préoccupations » : [Click here](#).

Link to « Présentation du dispositif : Prévention du risque de corruption » : [Click here](#).

Link to interactive tool e-RESIST created in collaboration with Thales: [Click here](#).