

## COMMITMENT FROM THE GROUP'S PRESIDENT AND CEO

“ CONDUCTING BUSINESS WHILE REMAINING ETHICAL IS THE CENTRAL FOCUS OF KEOLIFE, KEOLIS GROUP'S CORPORATE PROJECT LAUNCHED IN 2013. ”



As any company, Keolis aims to grow, striving to obtain new contracts in each of its transport and parking businesses, in an increasingly demanding, competitive and regulatory environment worldwide.

Every manager and every employee has a specific role to play in terms of business ethics by complying with the measures set out in the Group's Guide of Ethical Business Conduct and by complying with the rules and principles stipulated in the Group's Compliance Program: Konformité.

The program is a simple and practical guide of best practices, which also lists practices that are forbidden by law and by our ethical concept of business. Everyone must comply with the rules and principles of the “Konformité Program” and refer to it when confronted with a potentially risky situation.

We are all responsible for our actions with regard to the stakeholders that surround our business and that make up the ecosystem we operate in. Our job is to serve the public and exercising this responsibility is part of what makes our activity so noble.

“ THE RIGHT ATTITUDE FOR OUR EMPLOYEES AND OUR PARTNERS, EVERY DAY ”

→ I AM THEREFORE COUNTING ON EVERY MANAGER AND ON EVERY EMPLOYEE IN THE GROUP TO HAVE «THE RIGHT ATTITUDE» IN EVERY SITUATION.

### TO FIND OUT MORE, YOU CAN CONTACT:

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Version dated 19 March 2013

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→ OUR COMPLIANCE PROGRAM  
**Konformité**

PREVENTION  
CORRUPTION  
FRAUD  
RESPECT  
FREE, FAIR  
COMPETITION  
VIGILANCE  
VALUES  
CONFIDENTIALITY  
PROTECTION  
PERSONAL DATA

[www.forget-menot.com](http://www.forget-menot.com)

Keolis

## OUR COMMITMENT

THE GROWTH OF KEOLIS GROUP HAS ITS ROOTS IN ITS VALUES, ITS STRATEGY, ITS SKILLS AND ITS OWN SPECIFIC ASSETS. IT PURSUES GROWTH IN STRICT COMPLIANCE WITH THE APPLICABLE REGULATIONS AND BUSINESS ETHICS, NOT ONLY TO FULFIL ITS LEGAL REQUIREMENTS BUT ALSO, AND ABOVE ALL, TO FULFIL ITS ROLE AS A SOCIALLY RESPONSIBLE COMPANY.

A pro-active risk prevention and management strategy, with the introduction of a Compliance Program focusing on three fundamentals. They are the core commitment for the Group's management.

- Strict respect of free and fair competition
- Prevention of corruption and fraud
- Protection of personal data

An application of those fundamentals specific to operations, to give all employees a clear set of principles and rules, providing an effective reference system so that they can adopt the «right attitude» within the scope of their particular responsibilities.

A dedicated organisation and systems set up to drive the program and ensure that it is applied on a daily basis and in the long term.

## OUR COMPLIANCE PROGRAM, **Konformité** FOR A FREE AND FAIR COMPETITION

### PRINCIPLES

- Each entity determines its sales policy **independently** and adopts a strategy excluding any unfair use of its position.
- Each entity respects the **confidential** or exclusive nature of information concerning competitors and protects the Group's own information.

### FORBIDDEN PRACTICES

- Employees shall not enter into **agreements** with competitors or **abuse of a dominant position**.
- Employees shall not collect, share or use information on competitors obtained by illegal or unethical methods, nor shall they reveal **strategic information** relative to the Group's commercial and industrial policies.

## DAILY VIGILANCE IS REQUIRED IN OUR COMMERCIAL PRACTICES AND, IN PARTICULAR, STRICT INDEPENDENCE WITH REGARD TO OUR COMPETITORS

- Sales procedures and, in particular, responses to **calls for tender** must be handled in a strictly confidential manner and rooted in our **professionalism**.
- With competitors, we do not discuss, provide or exchange information concerning the Group's prices, markets, costs, margins or strategy.
- Research **into the competition** shall only be done within the legal framework and in compliance with business ethics.

## OUR COMPLIANCE PROGRAM, **Konformité** FOR THE PREVENTION OF CORRUPTION AND FRAUD

### PRINCIPLES

- The **rejection of all forms of corruption**, involving individuals representing public bodies or stakeholders from the private sector.
- A ban on all forms of **fraud**.
- A ban on **funding**, directly or indirectly, of political organisations.

### FORBIDDEN PRACTICES

- **Asking for, accepting or receiving any advantage**, monetary or otherwise, for one's own benefit, in exchange for a decision within the scope of one's functions.
- Offering or accepting a **gift or invitation** whose estimated value exceeds the limit defined in the Group's procedures.
- Promising, offering or granting **sponsorship, patronage and donations** in exchange for an unfair advantage.
- Making **facilitation payments**.

### VIGILANCE IS REQUIRED ON A DAILY BASIS

- **Gifts and invitations** received or offered: authorised in compliance with national legislation and the internal rules and procedures, as long as they cannot be perceived as an attempt to obtain preferential treatment.
- Relationships with **commercial consultants** are governed by a Group procedure, in order to prevent any risk linked to possible unlawful practices.

## OUR COMPLIANCE PROGRAM, **Konformité** FOR THE PROTECTION OF PERSONAL DATA

### PRINCIPLES

- **Respect of people's rights** through compliance with regulations regarding the purpose of personal data processing, security, confidentiality and data keeping period.
- **The application of the «Privacy By Design» principle for Group processing** involving personal data (customers, employees, temporary workers or job applicants).

### FORBIDDEN PRACTICES

- **Designing or rolling out new data processes** without taking the necessary compliance measures from the start.
- **Using personal data** or supplying it to third parties without being expressly authorised to do so.

### VIGILANCE IS REQUIRED ON A DAILY BASIS

- By checking **that our IT service providers are able** to fully comply with our principles.
- By being familiar and complying with **the Group's charter on the use of information systems** and, for administrators, the Group's charter for systems administrators.

## THE COMPLIANCE PROGRAM **Konformité** IS BACKED BY:

- The Ethics & Conformity Committee, comprising representatives of all the Group's units, corporate functions and operating divisions in France and abroad. This committee helps to define the fundamentals and main guidelines.
- A network of Ethics & Conformity correspondents from the Finance division, whose role is to help spread the word about the ethics and conformity culture as well as the program's reference systems.

**Konformité**