



# ANTI-BRIBERY POLICY

V1 –Revised January 2013

Dear all,

As a global specialist in calibration and measurement services for the industry, TRESICAL is dedicated to **conducting our business in an ethical manner in compliance with laws and regulations** that govern the global management of our business. We recognize that our business operations are subject to the laws of many different countries.

The purpose of this TRESICAL Anti-Bribery Policy is to implement a structure and provide **guidance to our personnel about compliance with global anti-bribery laws**. We recognize that compliance with these anti-bribery laws is essential to protect TRESICAL and our personnel from legal and regulatory sanctions.

In addition, our compliance is essential to **maintaining our strong reputation** and good standing in the global business community.

We are committed to ensuring that our suppliers and service providers:

- Are selected according to objective criteria
- Properly render legally permissible services
- Benefit from fairly negotiated contracts terms

We are committed to ensuring that our relationships with public bodies, civil servants and government officials:

- Are legal, independent and transparent
- Do not create any ambiguity in the way we conduct our business activities.

We are committed to working only with competent partners that enjoy an excellent reputation:

- We ask them to commit to complying with our anti-bribery policy
- Decision-making responsibilities, contributions, gains and responsibilities are shared on a clear and equitable basis, so that our partnership operates in a fair and transparent manner.



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We are committed to ensuring that:

- Our public statements and advertisements are truthful
- Effective policies are developed to prevent and respond to health and safety risks, both for our clients and for our employees
- Our transactions are fair and in full compliance with the law.

We are committed to:

- Managing business honestly and with a dedication to a job well done
- Using the resources available to us wisely and in a responsible manner
- Avoiding conflict of interest.

Understanding the global anti-bribery laws is not always easy. Please take the time to get familiar with the provisions of this Policy. If at any time you have questions about this Policy, the anti-bribery laws or permissible conduct related to this Policy or the anti-bribery laws, please contact the Ethics Committee of TRESICAL, which reports to the Chief Executive Officer, at [ethicscommittee@trescal.com](mailto:ethicscommittee@trescal.com) (see schedule 1 for details).

Regards,

**Olivier DELRIEU**

**CEO**

**TRESICAL GROUP**



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## 1. POLICY STATEMENT

TRESCAL companies, all of our managing directors, employees, project employees and independent contractors (collectively, “**Personnel**”) and all of our agents, service providers, outside consultants and other representatives acting on behalf of or under the control of TRESCAL (collectively, “**Representatives**”) must comply with the anti-bribery and anticorruption laws of the countries in which we do business, including without limitation, the OECD Anti-Bribery Convention, the United States Foreign Corrupt Practices Act (the “FCPA”), the United Kingdom Bribery Act 2010 (the “UK Bribery Act”), other laws implemented consistent with the standards in the OECD Anti-Bribery Convention, and other national anti-corruption laws (collectively, the “Anti-Bribery Laws”). In particular, the Anti-Bribery Laws have very broad scope.

**The Anti-Bribery Laws generally prohibit directly or indirectly authorizing, offering, promising or giving anything of value to a government official in order to influence or induce the government official to do or omit to do an official act in order to obtain or retain business or any improper advantage.** Regardless of your citizenship or the country from which you work, it is our policy to consider all Personnel in all of our offices and Representatives working on behalf of TRESCAL to be subject to the OECD Anti-Bribery Convention, the FCPA and UK Bribery Act.

**TRESCAL and its Personnel and Representatives will only conduct business in compliance this Policy and will not violate any Anti-Bribery Laws.**

TRESCAL will not, and nor will our Personnel or Representatives, authorize, pay, promise or offer to give anything of value to a government official (as defined in Section 4 below) or to any other person in order to improperly influence that government official or other person to act favorably towards TRESCAL. Also, TRESCAL and all of our Personnel and Representatives will not request or authorize any third party to make any such payment, promise or offer.

**All Personnel and Representatives must be familiar with the rules described in this Policy and regularly refresh their understanding of these rules. Those who are in supervisory roles must ensure that the Personnel and Representatives who report to them are familiar with the rules described in this Policy.** If at any time you have questions about this Policy, the Anti-Bribery Laws or permissible conduct related to this Policy or the Anti-Bribery Laws, please contact TRESCAL Ethics Committee at : [ethicscommittee@trescal.com](mailto:ethicscommittee@trescal.com)



**REMEMBER: Failure to comply with any provision of this Policy may result in disciplinary action, up to and including termination or dismissal for more serious violations, as well as civil or criminal charges.**



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## 2. WHO IS COVERED BY THE POLICY?

This Policy applies to all Personnel and all Representatives working on behalf of TRESICAL, including employees thereof.

## 3. WHAT IS BRIBERY?

### 3.1. Description of Bribery

Bribery has a range of definitions under various Anti-Bribery Laws, but the fundamental principles apply universally. **Bribery is the offer, promise, giving, soliciting or acceptance of an advantage as an inducement for action which is illegal, unethical or a breach of trust.** Acts of bribery are designed to influence the individual in the performance of his or her duties to act dishonestly or illegally. There will usually be a 'quid pro quo' – both parties will benefit.

**Bribery is prohibited in all countries in which TRESICAL operates, and penalties can be severe.**

**TRESICAL will not, and nor will our Personnel or Representatives, authorize, pay, promise or offer to give anything of value to or from any person (including government officials and private parties) where (1) the intent is to improperly influence or bring about the improper performance by any person of a relevant function or activity, or to reward improper performance by any person; or (2) it is known that the acceptance of the offer itself is an improper performance of a relevant function or activity.**

**Also, TRESICAL and all of our Personnel and Representatives will not request or authorize any third party to make any such payment, promise or offer. TRESICAL and its Personnel and Representatives likewise will not accept or solicit improper payments or advantages.**

**Bribery can take many different forms.** Some examples of bribes, include, but are not limited, to the following:

- Cash, cash equivalents (e.g., gift cheques or vouchers) or loans to an individual, their family members or associates;
- Payments for travel or entertainment, except those allowed under Section 5.2 of this Policy;
- Favors, including offers of employment or internships to government officials, their family members or associates;

- Gifts (e.g. perfume, jewellery, use of club membership), except those allowed under Section 5.2 of this Policy;
- Loans of tangible property (e.g., car, house)
- Donations to an affiliated or sponsored charity;
- Political contributions to political parties or candidates;
- Inducing a government official to overlook a violation or tolerate non-compliance with applicable laws, such as environmental or work safety laws;
- Influencing a government official to not perform a task that should otherwise be performed;
- Influencing a government official to reduce or ignore customs duties; and
- Inducing a government official to grant favorable tax treatment



#### REMEMBER:

- **The mere appearance of influencing a person may be sufficient to trigger an allegation that bribery has been committed.**
- An attempt to bribe a person is unacceptable and illegal even if the offer is not accepted or the payment does not achieve the desired outcome.
- **The perception of impropriety can cause embarrassment to TRESICAL, damage our reputation and force us to pay exorbitant litigation fees in our defense.**
- **In addition, you are not allowed to be “willfully blind” to the facts of a situation.** For example, if you believe you are being requested to authorize an expenditure with respect to which an improper payment is highly probable or substantially certain to occur, you cannot authorize the disbursement. Also, you cannot intentionally avoid the relevant facts; you must act in good faith and perform reasonable due diligence so that you cannot be accused of being “willfully blind.” If there are red flags, then you need to perform reasonable due diligence and not approve the transaction until you are confident it will not be used to make an improper payment.



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## 3.2. Examples of Bribery

### 3.2.1. Offering a bribe

**PROHIBITED: You offer a potential client tickets to a major sporting event, but only if she agrees to do business with us.**

This is an example of a violation of this Policy and a potential violation of the Anti-Bribery Laws, as you are making the offer in exchange for a commercial and contractual advantage. It may also be an offense for the potential client to accept your offer.

**ACCEPTABLE: TRESICAL invites the CEO of an established, private sector client to an annual client air show and pays for the hotel room, entertainment and meals.**

It is not a violation of this Policy and would not be treated as a violation of the Anti-Bribery Laws to provide hospitality for the purpose of cementing and recognizing a valuable business relationship or for the purpose of enhancing knowledge about TRESICAL in our clients' industries, provided that the expenditures are reasonable (i.e. not unduly lavish), proportionate (including in relation to the business relationship and the individual receiving the expenditure), and documented, and any necessary approvals have been obtained.

### 3.2.2. Receiving a bribe

**PROHIBITED: A supplier gives your nephew a job, but makes it clear that in return the supplier expects you to continue to do business with the supplier.**

It is a violation of this Policy and an offense under the Anti-Bribery Laws for you to accept the offer as you would be doing so to gain a personal advantage.

**ACCEPTABLE: A private equity client invites TRESICAL engagement team members to the closing dinner related to a strategic IT project.**

Attending this dinner would not be a violation of this Policy or the Anti-Bribery Laws, assuming the expenditures are reasonable and proportionate. The purpose of this dinner is to recognize an achievement and not to bring about an improper performance.

### 3.2.3. Bribing a government official

**PROHIBITED: You arrange for a broker to make a payment to a government official for the purpose of having TRESICAL "win" a request for proposal for a government-owned company.**

The offense of bribing a government official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us.



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**ACCEPTABLE: You provide a box of chocolates in the name of “TRESICAL” to each of your client contacts, including your client contact at a state owned organization, during a holiday season.**

As long as you comply with Section 5.2 of this Policy, this would not be a violation of this Policy or the Anti-Bribery Laws. A nominal gift during the holiday season which is sent to your client contacts is an acceptable practice.

## 4. WHO IS A “GOVERNMENT OFFICIAL”

For the purposes of this Policy, “**government officials**” include those individuals outside the applicable jurisdiction who, regardless of rank, are:

- Government officials and employees;
- Members of political parties, party officials and candidates for public office;
- Directors and employees of government-owned or government controlled Enterprises, including sovereign wealth funds, government controlled businesses, government-controlled non-profit organizations, and government-affiliated investment funds, pools, or other investment vehicles;
- Officials and employees of public international organizations (for example, the United Nations, International Olympic Committee, International Red Cross, World Bank, etc.);
- People who are considered to be a government official under the Anti-Bribery Laws or other applicable local law;
- People acting on behalf of any of the foregoing, even though they may not be employees of the government or any of the organizations referred to above; or
- Close relatives (for example, parent, sibling, spouse or child) or close business associate of any of the above.

## 5. WHAT ARE THE KEY AREAS FOR TRESICAL?

Each two years, TRESICAL Ethics Committee conducted a risk assessment in order to determine the key risks to our business related to bribery. The risk assessment included input from our consultants and administrative staff. As a result of the risk assessment, we identified these main risks to TRESICAL related to bribery:



## 5.1. Unusual Transactions or Requests – Potential “Red Flags”

The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly in accordance with Section 8 of this Policy:

- Payments made in a country with a widespread history of corruption
- Off-the-book accounts where payment is made to a Representative who then diverts part of the proceeds to a separate account for unexplainable reasons
- Representatives who make unusual requests (e.g., backdating or altering invoices, asking for payments by unusual means, such as through bank accounts outside the country where services are being offered, or to third persons)
- Representative requests checks to be made out to “bearer” or “cash” or seeks payment by some other anonymous means
- Representative wants to work without a contract (or vague contract) and either refuses to confirm that they will abide by the Anti-Bribery Laws or disclose their identity
- Representative asks for commissions that are substantially higher than the “going rate” in that country among comparable service providers
- Representative has family or business ties with government officials or has a bad reputation in the business community
- Potential government customer or authorizing agency recommends a specific partner
- False accounting entries or inadequate documentation for payments
- Hiring companies or individuals closely associated with government officials or their relatives
- Purchasing or renting properties from government officials or their relatives
- Payments to charitable organizations headed by government officials
- Unusual forms of payment or barter transactions are requested
- Requests for trade discounts or price variances

## 5.2. Travel, Entertainment and Gifts

Travel, entertainment and gifts are often paid for or accepted in the normal course of our business, but they can be considered improper bribes if they are made with an improper motive, if they violate local laws, or if they otherwise are excessive or lavish. There are times when travel, entertainment and gifts may be acceptable if they fall within reasonable and proportionate boundaries. We appreciate that the practice of giving business gifts and providing hospitality varies between countries and regions and what may be normal and



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acceptable in one region may not be in another. However, we must consider the Anti-Bribery Laws when providing travel, entertainment or gifts to any third party.

**The Company has the following guidelines with respect to entertainment expenses for any third party:**

- **Travel Hosting.** NO travel and lodging arrangements are permitted to be made or paid for by the Company for the benefit of any third party, absent prior approval from the General Manager. Travel and lodging arrangements will generally not be authorized for government officials.
- **Meals.** Lunches and/or dinners may be offered as part of events arranged for any third party or as part of domestic conferences or business meetings, provided that such dinners and lunches (i) are directly related to the promotion of the Company's products and services, (ii) are attended by Company personnel to further those purposes, (iii) are in line with the spirit of this guideline, and (iv) cannot be construed as trying to obtain an improper advantage.
- **Entertainment.** Entertainment may be offered to any third party as part of an event or business trip, or as part of a domestic conference or meeting, provided that such entertainment (i) is directly related to the promotion of the Company's products and services, (ii) is attended by Company personnel to further those purposes, (iii) is in line with the spirit of this guideline, (iv) cannot be construed as trying to obtain an improper advantage, and (v) where the cost of such entertainment is reasonable in value and, if required, approved in advance by the TRESICAL Ethics Committee.
- **Gift Giving.** Gift-giving is discouraged in connection with government officials. In connection with any party, when gifts are provided, it is preferred to give preapproved items bearing the Company's corporate logo. No gift cards, shopping cards, gift certificates, or other similar gifts may be provided, even on holidays. Other gifts may be provided, however, consistent with the terms of these guidelines.
- **No Travel Hosting/Meals/Entertainment/Gift if a business decision is pending.** Do not offer any meals or entertainment if any business decision is pending with the foreign official's employer that could affect the Company.

In all cases, expenditures must be:

- objectively reasonable in amount (i.e. not unduly lavish, and reasonable including in relation to the business relationship and the individual receiving the expenditure);
- directly related to the promotion of the Company's products and services provided by TRESICAL employees and representatives;
- in the case of entertainment, attended by Company personnel to further those purposes,
- limited to persons who TRESICAL seeks to create or strengthen a legitimate business relationship with (in this regard, particular care should be taken in making meals and



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entertainment-related expenditures for the benefit of spouses, family or friends of current/potential business partners - gifts and travel-related accommodations are prohibited for such persons);

- consistent with the remainder of this policy, and
- of a nature such that they could not reasonably be construed as intending to obtain or retain an improper advantage.

**In any case, make sure that the cost of all meals or entertainment is reasonable in value.**

### 5.3. Representatives and Other Third Parties

Bribery problems often involve third parties, including our Representatives working locally or abroad. Representatives must also comply with this Policy when working for TRESICAL.

**Because Anti-Bribery Laws prohibit "indirect" as well as direct payments and offers, TRESICAL and our Personnel may be held liable for the conduct of Representatives when we know or reasonably should have known of the unlawful conduct.** Representatives such as senior advisors, business developers and other parties under contract for the purpose of establishing new business opportunities pose some of the greatest risks to TRESICAL under the Anti-Bribery Laws. Turning a "blind eye" or ignoring "red flags" that something may be wrong does not keep TRESICAL or you from potential criminal liability.

Authorizing a Representative to do something that you cannot do directly is a violation of this Policy.

#### 5.3.1. Due Diligence

Before you recommend that TRESICAL enter into any contract or arrangement with a Representative, you must first conduct a reasonable investigation into his, her or its background, reputation, and business capabilities. The purpose of the due diligence process is to get comfortable that a Representative does not pose a reasonable risk of violating Anti-Bribery Laws. The due diligence process may be different for each scenario as it must be proportionate and risk based in order to mitigate our bribery risks. Due diligence may be conducted internally by TRESICAL Personnel if appropriate.

Before engaging any Representative, you should ask:

- Is the Representative qualified to perform what is necessary under the contract?
- Does the Representative have good references or reputable clients?
- Are there any red flags, such as ties to government officials, unusual compensation arrangements, or demands by the end user that a particular third party be retained?

All relationships with Representatives must be documented in signed, written contracts, which include appropriate contractual provisions. **You must engage** the TRESICAL Ethics Committee ([ethicscommittee@trescal.com](mailto:ethicscommittee@trescal.com)) **if you feel that you need their guidance.**



#### REMEMBER:

- **The circumstances surrounding the relationship with the Representative will help determine the appropriate contract provisions on Anti-Bribery Laws to include in the contract.** *Sample anti-corruption safeguard language is provided in Schedule A to this policy.*
- **If you are responsible for the oversight and supervision of a Representative, you must ensure that the Representative receives a copy of this Policy and agrees to comply with its terms.**

#### **5.3.2. Compensation and Payments to Representatives**

**Compensation to Representatives must be commercially reasonable, and commensurate with the tasks that they actually undertake.** Contracts for services to be provided by Representatives should generally provide **fixed compensation for specific, identified tasks and should avoid large percentage-based commissions and success fees.**

Payments to Representatives must be made in accordance with the terms of their contracts; in particular, it is a violation of this Policy to honor requests by Representatives to vary the terms of contracts by:

- Increasing or decreasing agreed amounts on any invoice if there is no factual, documented basis; or
- Submitting multiple invoices if you suspect such invoices may be used in a manner contrary to TRESICAL standards, procedures or applicable laws or otherwise used improperly.

#### **6. FACILITATION PAYMENTS**

In some countries, it may be the local practice for businesses to make payments of small amounts to low-level government officials in order to expedite or "facilitate" routine government actions over which such officials have no discretion. *Examples of routine, non-*

*discretionary actions include providing police protection, granting visas or utility services, or clearing customs.* Such payments are called "facilitating payments".

Some Anti-Bribery Laws, such as the FCPA, permit facilitating payments in very narrow circumstances. Other Anti-Bribery Laws, such as the UK Bribery Act, prohibit facilitating payments in all cases.

**Facilitating payments are prohibited under this Policy without the prior written approval of your General Manager.**



**REMEMBER:** Please note, in this regard, that if you receive a demand for a payment in a context where you face an imminent threat to your health or safety (or those of other persons), making the payment in question would not constitute a prohibited facilitation payment. However, if you make such a payment, you should promptly report the circumstances surrounding the payment to your General Manager.

## 7. DONATIONS

**TRESCAL does not make contributions to political parties. TRESCAL does not generally make charitable donations, but will do so in limited circumstances.** Charitable donations made on behalf of the firm will be documented.

Personnel are free to make political contributions and charitable donations on their own behalf, and not on behalf of TRESCAL, in accordance with applicable laws and regulations.

## 8. YOUR RESPONSIBILITIES

If you are aware that any Personnel is involved in acts which violate this Policy including bribery, **you must report such conduct without delay to the TRESCAL Ethics Committee.**

**TRESCAL strictly prohibits retaliation against anyone who in good faith raises or helps to address these issues.** If at any time you have questions about this Policy, the Anti-Bribery Laws or permissible conduct related to this Policy or the Anti-Bribery Laws, please contact the TRESCAL Ethics Committee at: [ethicscommittee@trescal.com](mailto:ethicscommittee@trescal.com)

**This Policy defines the minimum standards that all Personnel and Representatives worldwide must observe when dealing with government officials and other people on behalf of TRESCAL.**



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If you have questions about this Policy or the Anti-Bribery Laws, in a situation that may raise anti-bribery concerns or are uncertain about how to proceed, consult the TRESICAL Ethics Committee before acting. All Personnel are responsible for preventing, detecting, and reporting instances of noncompliance to a member of the TRESICAL Ethics Committee in accordance with the TRESICAL Policy.

**No Personnel will be subject to retaliation because of a good faith report of a complaint or concern regarding suspected violations of this Policy or the Anti-Bribery Laws.**

**Failure to comply with any provision of this Policy may result in disciplinary action, up to and including termination or dismissal for more serious violations, as well as civil or criminal charges.**

## 9. RECORD-KEEPING

**We must keep financial records and have appropriate internal controls in place** which will evidence the business reason for making payments to third parties.

**You must declare and keep a written record of all hospitality or gifts accepted or offered,** which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. **No accounts must be kept "off-book" to facilitate or conceal improper payments.**

**All records must be maintained for a minimum of five years, or a longer period if required pursuant to the applicable company records retention policy.**

## 10. ADDITIONAL PROVISIONS

**It is the responsibility of Risk Management to ensure that this policy is kept updated,** and that any material changes to the policy are communicated to relevant business units.

**It is the responsibility of individual business units to ensure that the policy is communicated to any third parties** (such as representatives) who it extends to.

**Risk Management shall ensure an appropriate schedule of anti-corruption training** for all company personnel and relevant third parties.

## SCHEDULE 1

### THE ETHICS COMMITTEE: SCOPE OF WORK and PROCEDURES



The Ethics committee, which reports to the Chief Executive Officer, is responsible for the general oversight of ethical issues related to the Group's activities.

The Committee:

- Makes recommendations to the CEO on all ethical issues, whether in relation to matters on which the Committee has made an independent inquiry or questions that have been submitted to it.
- Notifies the General Managers of any risks that Group activities may be contested on ethical grounds.
- Ensures that the Group's Anti-bribery policy is circulated and proposes any amendments it considers necessary or appropriate.
- Recommends procedures for and, at its discretion, provides replies in the strictest confidence to any question Group employees may have concerning application or compliance with the Anti-bribery policy in specific circumstances.
- Reviews, with the business units concerned, any verbal or written communications related to ethics.
- Advises the Group's training departments (Trescal Institute included) on incorporating a presentation of the Anti-bribery Policy into training programs, in particular those for the new recruits and management.

Each country is encouraged to inform the Ethics Committee in advance of new projects and proposed changes in an ongoing business activity that could raise an ethical issue.

The CEO or any employee of the Group may request the Ethics Committee's advice on any ethics-related matter.

The Committee, at its discretion, may address its replies exclusively to the persons requesting its advice. Its members may not reveal the identity of anyone requesting their advice and may not disclose information that would make it possible to identify them.

The Committee may also consider on its own initiative any ethics-related matters concerning the Group. The Committee is entitled to visit any Group facility or subsidiary.

Each year in June, the TRESICAL Ethics Committee conducted a meeting in order to improve its own scope of work and procedures.

Each two years, TRESICAL Ethics Committee conducted a risk assessment in order to determine the key risks to our business related to bribery. The risk assessment included input from our consultants and administrative staff. As a result of the risk assessment, we identified these main risks to TRESICAL related to bribery:

The members of the Committee:

- Marie-Zoé BEAUGRAND (HR Group Director) - [ethicscommittee@trescal.com](mailto:ethicscommittee@trescal.com)
- Jean-Marc d’HULST (for Europe) - [ethicscommittee@trescal.com](mailto:ethicscommittee@trescal.com)
- Sheri LIZZET (for the US) - [ethicscommittee@trescal.com](mailto:ethicscommittee@trescal.com)
- Françoise PAULUSSEN (for the BENELUX) - [ethicscommittee@trescal.com](mailto:ethicscommittee@trescal.com)
- Chrissy ROWLEY (for the UK + Singapour) - [ethicscommittee@trescal.com](mailto:ethicscommittee@trescal.com)





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## SCHEDULE 2

### **SUGGESTED COMPLIANCE TERMS FOR REPRESENTATIVE AGREEMENTS**

In the “Compensation” section of the agreement, the terms should oblige the advisor to provide reports concerning his/her work for the company that are reasonably requested by TRESICAL.

The agreement should include a general anti-corruption compliance safeguard, as follows

*“[The Representative(s)] warrant, agree and undertake that, in connection with this Agreement, neither they nor any party acting on their behalf has or shall engage in Improper Payment Activity. For purposes of this Agreement, the term “Improper Payment Activity” includes offering, promising, authorizing or providing any funds, gift, advantage or other thing of value, including any payment to expedite a routine or non-routine government action, whether directly or indirectly, to any “Public Official” or private party for any illegal purpose or in any other manner that breaches applicable anti-bribery or anticorruption laws, regulations, decrees and/or official government orders or requirements.*

*The [Representatives] further warrant, agree, and undertake to comply with the TRESICAL Anti-Bribery Policy.*

*Any breach of this section shall be considered a material breach of this Agreement, and entitle TRESICAL to terminate the agreement immediately with cause, withhold any payments that may otherwise be due under the Agreement, and receive from [Representatives] any funds paid previously under this Agreement that may relate, directly or indirectly, to breach in question.”*

On a case-by-case basis, Risk Management may require other safeguards to be implemented for representatives operating in jurisdictions or circumstances that pose higher corruption-related risks.