The following pages contain the detailed scoring for your company based on public information.

The following table represents a summary of your scores:

<table>
<thead>
<tr>
<th>Topic</th>
<th>Number of questions</th>
<th>% score based on public information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leadership, Governance and Organisation</td>
<td>10</td>
<td>10%</td>
</tr>
<tr>
<td>Risk Management</td>
<td>7</td>
<td>0%</td>
</tr>
<tr>
<td>Company Policy and Codes</td>
<td>12</td>
<td>0%</td>
</tr>
<tr>
<td>Training</td>
<td>5</td>
<td>0%</td>
</tr>
<tr>
<td>Personnel and Helplines</td>
<td>7</td>
<td>0%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>41</strong></td>
<td><strong>2.4%</strong></td>
</tr>
</tbody>
</table>
A1:
Does the company publish a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company publishes a statement from the CEO supporting the ethics and anti-corruption agenda of the company.

References:
Public:
NA
A2:

Does the company’s Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company’s CEO demonstrates a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company.

References:

Public:
NA
A3:
Does the company’s Chief Executive Officer demonstrate a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company’s CEO demonstrates a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company.

References:
Public:
NA
A4:
Does the company publish a statement of values or principles representing high standards of business conduct, including honesty, trust, transparency, openness, integrity and accountability?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a statement of values representing high standards of ethical business conduct. The five values promoted by the company are responsibility, customer focus, innovation, performance and people development.

References:
Public:
TI notes:
Annual Report 2013, p.7:
‘Values and Commitments
Respect for customers, suppliers, employees and shareholders is an integral part of the group's strategy. Industrial and business ethics, employee development, staff safety, as well as environmental protection, proves the company's ability to efficiently meet tomorrow challenges. Ever since its creation, nexter has pursued a continuous improvement policy in all of these areas, aiming at developing sustainable best practices in each of the group entities.’

Company website: Our responsibility
‘Corporate responsibility applies to the Group’s relationships with all its stakeholders, whether customers, suppliers, shareholders or - of course - employees.
In the context of the strategic imperatives of Nexter, corporate responsibility contributes not only to building and maintaining transparent trust-based relationships between the Group and its partners, but also to its business performance. Its practical implementation is
based on a certain number of policies and initiatives, whose main focus is on unambiguous, transparent corporate governance, risk management and strong internal controls, our environment policy and the development of partnerships with our suppliers.

Our corporate responsibility principles are also reflected in the five values promoted internally by the Group: responsibility, customer focus, innovation, performance and people development.’

A5: Does the company belong to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption?

Score: 2

Comments: Based on public information, there is readily available evidence that the company is a signatory to the ASD Common Industry Standards.

References:
Public:
Annual Report 2013, p.7:
‘As a member of the AeroSpace and Defence Industries Association of Europe (ASD), Nexter has adhered to its anticorruption fundamentals, specifically the Common Industry Standards, which define the prevailing ethical standards and behaviours for defence industries.’

ASD website: http://www.asd-europe.org/
A6: Has the company appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda?

Score: 0

Comments: Based on public information, there is no readily available evidence that the company has appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda. TI notes that it is unclear if the Audit Committee has such responsibility as part of its responsibility for internal compliance.

References:

Public:

TI notes:

Company website: Our governance

‘In each Group company, a board of directors (or supervisory board) and rules of procedure guarantee the application of governance principles and clearly define the powers vested in the various decision-making and management bodies.

The Nexter Systems Board of Directors has eight members, three of whom are employee representatives. The Board of Directors of GIAT Industries – Nexter’s financial holding company – has 18 members split between government representatives, employee representatives and independent directors. The GIAT Industries Board also has three specialist committees: the Audit Committee which approves the financial statements and has responsibility for internal compliance, the Bids Committee and the Compensation Committee. Each of these committees is chaired by an independent director.’

http://www.nexter-group.fr/en/our-governance
A7:
Has the company appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda, and who has a direct reporting line to the Board?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda.

References:
Public:
NA
A8:
Is there regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda?

Score:

0

Comments:
Based on public information, there is no readily available evidence that there is regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda.

References:
Public:
NA
A8(a):
Is there a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and evidence of improvement plans being implemented when issues are identified?

Score:

0

Comments:
Based on public information, there is no readily available evidence of a formal, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, or evidence of improvement plans being implemented when issues are identified.

References:

Public:
NA
A9:
Does the company have a formal process for review and where appropriate update its policies and practices in response to actual or alleged instances of corruption?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a formal process for review and where appropriate updates its policies and practices in response to actual or alleged instances of corruption.

References:
Public:
NA
A9(a):
Does the company have a formal anti-corruption risk assessment procedure implemented enterprise-wide?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure implemented enterprise-wide. The company has a risk management system but there is no evidence that corruption is specified as a risk to be identified and mitigated.

References:
Public:
TI notes:
Company website: Our responsibility
‘Corporate responsibility applies to the Group’s relationships with all its stakeholders, whether customers, suppliers, shareholders or - of course - employees.
In the context of the strategic imperatives of Nexter, corporate responsibility contributes not only to building and maintaining transparent trust-based relationships between the Group and its partners, but also to its business performance. Its practical implementation is based on a certain number of policies and initiatives, whose main focus is on unambiguous, transparent corporate governance, risk management and strong internal controls, our environment policy and the development of partnerships with our suppliers.
Our corporate responsibility principles are also reflected in the five values promoted internally by the Group: responsibility, customer focus, innovation, performance and people development.’

Company website: Risk management
‘Managing risks and strengthening internal controls
The Group ensures continual improvement of its risk management procedures. Having mapped its exposure to risk, it has identified the major risks on the basis of their impact,
likelihood and the resources in place to contain their effects. In addition to this regularly-reviewed risk map, the Group also conducts audits from time to time.

As part of ensuring effective risk management, the legal affairs department is systematically involved at an early stage in negotiating contracts that may pose exceptional challenges. The same department also handles disputes and legal actions on behalf of Group companies.

In more general terms, the Group relies on a series of resources and procedures in order to gain a better understanding of the risks related to its business and to control those risks. These include benchmarking, a quality structure, internal audits, procedures to ensure the safety of people, property in the environment, access and document controls and external inspections.’

A10:  
Does the company have a formal anti-corruption risk assessment procedure for assessing proposed business decisions, with clear requirements on the circumstances under which such a procedure should be applied?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure for assessing proposed business decisions. The company has a risk management system but there is no evidence that corruption is specified as a risk to be identified and mitigated in relation to proposed business decisions.

References:

Public:

TI notes:

Company website: Risk management

‘Managing risks and strengthening internal controls

The Group ensures continual improvement of its risk management procedures. Having mapped its exposure to risk, it has identified the major risks on the basis of their impact, likelihood and the resources in place to contain their effects. In addition to this regularly-reviewed risk map, the Group also conducts audits from time to time.

As part of ensuring effective risk management, the legal affairs department is systematically involved at an early stage in negotiating contracts that may pose exceptional challenges. The same department also handles disputes and legal actions on behalf of Group companies.

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A11: Does the company conduct due diligence that minimises corruption risk when selecting or reappointing its agents?

Score: 0

Comments: Based on public information, there is no readily available evidence that the company conducts due diligence when selecting or reappointing its agents.

References:
Public: NA
A12:
Does the company have contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption.

References:
Public:
NA
A13:
Does the company make clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company makes clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance. TI does note the references made to developing partnerships with suppliers.

References:

Public:
TI notes:
Company website: Supplier Relations
‘Developing partnerships with our suppliers
In a Group now focused on systems engineering and integration, nearly 80% of systems added-value is contributed by our suppliers. The quality of our relationship with suppliers is therefore a strategically-important component of customer satisfaction. So the aim of the Group is to build long-term partnerships with its suppliers on the basis of mutual respect and trust.

With this objective in view, the Group is a signatory of the Relation fournisseur responsable de la Médiation Inter-Entreprises, de la Médiation des Marchés publics et de la CDAF (Compagnie des Dirigeants et Acheteurs de France); a charter governing relationships between major companies and their SME suppliers. In signing this important agreement, the Group has demonstrated its commitment to continuing and strengthening the balanced long-term relationships it has with its suppliers. The company is also a member of Pacte PME, and as such promotes the aims of this organization by encouraging the involvement of new SMEs and by helping its suppliers to grow.

The transparent procedures contained in the Group purchasing policy enable us to select the best suppliers in each area of business on the basis of reciprocal commitments, the precise definition of shared responsibilities and risks and respect for each other's
intellectual property. The Group's suppliers therefore share responsibility for achieving technical, quality, cost and lead time targets.

Thanks to this involvement, the Nexter Group has been awarded the Label Relations Fournisseurs Responsables.’

http://www.nexter-group.fr/en/our-commitments/supplier-relations
A13(a):
Does the company explicitly address the corruption risks associated with offset contracting?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company explicitly addresses the corruption risks associated with offset contracting.

References:
Public:
TI notes:
ECCO website: Members
‘Offset Obligors: Nexter Systems’.
http://www.ecco-offset.eu/members/
A13(b):
Does the company conduct due diligence that minimises corruption risk when selecting its offset partners and offset brokers?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company conducts due diligence when selecting its offset partners and brokers.

References:
Public:
See references for A13a.
A15:
Does the company have an anti-corruption policy that prohibits corruption in its various forms?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has an anti-corruption policy.

References:
Public:
NA
A16:
Is the anti-corruption policy explicitly one of zero tolerance?

Score:
0

Comments:
Based on public information, there is no readily available evidence of a zero-tolerance anti-corruption policy.

References:
Public:
NA
A17: Is the company's anti-corruption policy easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company?

Score: 0

Comments: Based on public information, there is no readily available evidence that the company’s anti-corruption policy is easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company.

References:

Public: NA
A17(a):
Is the company’s anti-corruption policy easily understandable and clear to Board members, employees and third parties?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company’s anti-corruption policy easily understandable and clear to Board members, employees and third parties.

References:
Public:
NA
A18:
Does the anti-corruption policy explicitly apply to all employees and members of the Board?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company’s anti-corruption policy explicitly applies to all employees and members of the Board.

References:

Public:
NA
A20:
Does the company have a policy on potential conflicts of interest, and does it apply to both employees and board members?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a policy on conflicts of interest.

References:
Public:
NA
A21:
Does the company have a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery.

References:
Public: NA
A22:
Does the company's anti-corruption policy include a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a policy for the giving and receipt of hospitality to ensure that such transactions are bona fide and not a subterfuge for bribery.

References:
Public:
NA
A23:
Does the company have a policy that explicitly prohibits facilitation payments?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a policy that explicitly prohibits facilitation payments.

References:
Public:
NA
A24:
Does the company prohibit political contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent? Does the company record and publicly disclose all political contributions?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company prohibits or regulates political contributions, in order to prevent undue influence or other corrupt intent. Nor does the company record and publicly disclose all political contributions.

References:
Public:
NA
A25:
Does the company have a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, and discloses the issues on which the company lobbies?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a clear policy on engagement in lobbying activities, nor does it disclose the issues on which the company lobbies.

References:
Public:
NA
A25(a):
Does the company prohibit charitable contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company regulates charitable contributions in order to prevent undue influence or other corrupt intent.

References:

Public:
NA
A26:
Does the company provide written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company provides written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda.

References:
Public:
NA
A27:
Does the company have a training programme that explicitly covers anti-corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a training programme that explicitly covers anti-corruption.

References:
Public:
NA
A28:
Is anti-corruption training provided in all countries where the company operates or has company sites?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a training programme that explicitly covers anti-corruption.

References:
Public:
NA
A29:
Does the company provide targeted anti-corruption training to members of the Board?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company provides targeted anti-corruption training to members of the Board.

References:
Public:
NA
A30:
Does the company provide tailored ethics and anti-corruption training for employees in sensitive positions?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company provides tailored ethics and anti-corruption training for employees in sensitive positions.

References:
Public:
NA
A31:
Does the company have a clear and formal process by which employees declare conflicts of interest?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a clear and formal process by which employees declare conflicts of interest.

References:
Public:
NA
A32: Is the company explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities?

Score: 0

Comments: Based on public information, there is no readily available evidence that the company is explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities.

References:
Public: NA
A33:
Does the company have multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity?

Score:

0

Comments:
Based on public information, there is no readily available evidence of multiple, well-publicised channels that are accessible and guarantee confidentiality or anonymity, to report concerns or instances of suspected corrupt activity.

References:
Public:
NA
A33(a):
Are the whistleblowing channels available to all employees in all geographies?

Score:
0

Comments:
Based on public information, there is no readily available evidence of whistleblowing channels.

References:
Public:
NA
A33(b):
Does the company have formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively.

References:

Public:
NA
A34:

Does the company have well-publicised resources available to all employees where help and advice can be sought on corruption-related issues?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has well-publicised resources available to all employees where advice can be sought on corruption-related issues.

References:

Public:

NA
A35:
Is there a commitment to non-retaliation for bona fide reporting of corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence of a company commitment to non-retaliation for bona fide reporting of corruption.

References:
Public:
NA
Information Sources:

Company Website:
http://www.nexter-group.fr/fr [French]
http://www.nexter-group.fr/en [English]

Governance:
http://www.nexter-group.fr/en/our-governance

Supplier Relations:
http://www.nexter-group.fr/en/our-commitments/supplier-relations

Risk Management:

Annual Report 2013: