

## **GEPEC AMERICAS LLC**

As a oil & gas exploration solutions provider, is exposed to the risk of corruption and has therefore developed a strong and global commercial strategy to help prevent this risk since building date. GEPEC AMERICAS LLC has established specific procedures and guidelines to support its corruption prevention policy throughout the company.

GEPEC AMERICAS LLC continuously improves its programs on corruption prevention. Senior-level staffs have been appointed at the corporate, division and country level to lead these efforts. At corporate level, the Vice President, Ethics and Corporate Responsibility are the “anti-corruption process sponsor” with specific responsibility for monitoring this process.

GEPEC AMERICAS LLC is currently updating the Best Practices Handbook, the primary process document on the company’s worldwide policy on selection, evaluation, monitoring and payment of third parties. The new version of the handbook will provide guidelines on working not only with external business advisors such as experts, lobbyists and consultants, but with all key industrial partners such as subcontractors, co-contractors, distributors, prime contractors and joint ventures. As part of the risk-based approach of this policy, only designated, empowered and experienced GEPEC AMERICAS LLC’s entities have prerogatives over the selection and payment of third parties. These entities are required to apply a strict, multi-layer compliance and approval process. They are also in charge of negotiating reasonable fees linked to the services provided by these parties. For example, business advisors that have successfully completed the GEPEC AMERICAS LLC vetting process are paid on a retainer fee basis and only after documentary evidence of their work have been provided. As GEPEC AMERICAS LLC has expanded its geographical presence over the years, it has developed long term industrial partnerships with local companies. The Best Practices Handbook details the strict due diligence process that all potential partners must undergo.

GEPEC AMERICAS LLC’s commitment to preventing corruption is reflected in its policy, internal procedures and organization, including rigorous internal controls on the design, implementation and enforcement of guidelines. The use of internal and external auditors is also a key element of this approach.

As part of its commitment to extend its ethics and corporate responsibility policy to its suppliers, GEPEC AMERICAS LLC requires its suppliers to sign the Group’s purchasing and Corporate Responsibility Charter.

GEPEC AMERICAS LLC is a leading member of Task Forces and Working Groups on business ethics in the major aerospace and defense industry associations and has received international recognition as a responsible company that is continuously improving its way of conducting business.

GEPEC AMERICAS LLC also offers face-to-face training programs on business ethics that are carefully tailored to the needs of different groups of employees and their roles within the organization. All members of the marketing and sales job family are encouraged to complete a four-hour class called “Business Ethics and Preventing Corruption”. The training is themed around the prevention of corruption in everyday business and helps promote a set of simple but important behaviors that are endorsed by the company as well as providing basic insights into legal aspects of these issues. Increasingly, the theme of business ethics is also embedded in the company’s other training programs. In 2015, ethics training and awareness was introduced as a theme on a range of training programs on topics including purchasing and programmed management, and in the Passport programs on management and marketing and sales. In 2016, the training programs on customer support services will also include the subject of ethics.

Regularly throughout the year, GEPEC AMERICAS LLC runs awareness campaigns based on e-mail messages,

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intranet features and articles in internal magazines. In 2016, the company launched an e-learning course on ethics aimed at acquainting the company's employees worldwide with the basics of ethics and corporate responsibility. The course includes real-life scenarios to help employees recognize and deal with the kinds of situations they may encounter in their day-to-day work.

Executive Director

Signature: *Will William*