

THE RATP GROUP CODE OF ETHICS

February 2019



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Foreword

by the Group Chairwoman
and Chief Executive Officer

***“A new code of ethics, the cornerstone
of our behaviour in serving our customers”***



With operations in 14 countries on four continents, the RATP Group is **one of the world's largest urban public transport operators**. Every day, our 61,000 employees work together to design, operate and maintain an innovative transportation network that best meets the needs of the millions of passengers we serve every day.

This public service mission is accompanied by **a strong ambition**: the RATP Group wants to be a world leader in urban, sustainable and connected mobility and to establish itself as the preferred partner of smart cities.

This means that **we act daily to serve a more human, inclusive city that respects men and women** everywhere in the world through our multimodal transport offer.

To fulfil all our missions, we rely on our skills but also on the values embodied in our Code of Ethics, the first edition of which dates back to 2011.

Today, this code of ethics has evolved to become simpler, more practical and more operational, including the whistleblowing system that each Group employee can use.

Thus, we all have a unifying text in our hands today to support us in our daily actions to make the right decisions and adopt the right behaviours in the Group's interest.

This new Code, validated by the Group's Ethics, CSR and Compliance Committee, fully expresses our loyalty to a public service culture characterized by principles of equality, solidarity and dialogue.

It also reflects our determination to be at the service of **our customers**, with the aim of offering them every day everywhere in the world innovative services of the highest quality in response to their ever changing needs.

This is our mission. This is our pride.

Let me therefore invite you all to read this code carefully and to refer to it regularly so that each of us can strive to be exemplary, interdependent and dedicated to the general interest.

Catherine Guillouard

A handwritten signature in black ink, reading 'C Guillouard'.

The Charter of Values

The values of the RATP Group are the foundation of our company policy. They guide the actions of each of us on a daily basis and act as a framework for all employees.



1. People

Women and men are our most precious asset. Keeping people at the heart of the Group's development is the primary source of our excellence, our performance and our competitiveness, through dynamic social dialogue and an exemplary HR policy.



2. Commitment to the public interest

The RATP Group is establishing itself as a world leader in sustainable and connected urban transport, and the preferred partner for smart and sustainable cities. It is investing for future generations, implementing an ambitious policy of social and environmental responsibility, and offering passenger customers an efficient, innovative and safe service, whilst remaining competitive.



3. Respect

Respect is an essential condition to the conducting of our activities. It allows us to work together and manage the diversity both of our employees and our passengers. We are committed to respecting ethical principles and complying with laws and regulations.



4. Professionalism in serving our customers

We conduct our business with the absolute requirement of security and safety. Continuous improvement and operational excellence are ongoing objectives, for the satisfaction of all our customers.



5. Welcoming challenge

True to our history, we are determined to rise passionately to the challenges that lie ahead in the Paris Region, France and internationally. We are transforming to successfully deal with the rise in competition, including the opening up of our historical networks. We also carry out innovative and complex projects to meet the challenges of new forms of transport.



6. Openness

Being attentive to the expectations of our customers and our stakeholders is the basis of our efficiency. Opening up to a variety of geographical and entrepreneurial cultures is a great source of wealth and development.

Our 4 guiding principles

Our guiding principles provide us with a framework for achieving our strategic plan, in accordance with our values.

1 Respect for people

- ▶ Women and men are the RATP Group's most precious asset.
- ▶ Respect for people is the foundation stone for relationships between employees and/or partners of the RATP Group. It is the heart of our relationship with our customers and our stakeholders.
- ▶ The Group's performance is based on individual commitment.
- ▶ The role of managers is essential.
- ▶ Each of us has a duty to set an example, be transparent and interdependent.

2 Customer service

- ▶ The RATP Group puts its customers (organising authorities and passengers) first, to ensure their maximum satisfaction. There is no effective quality of service without individual and collective involvement, without commitment from us all.

3 Legal compliance

- ▶ The RATP Group complies with applicable national and international laws and standards.
- ▶ Each employee is required to avoid any activity or conduct likely to put the Group in illegal situations that could damage its reputation.
- ▶ In accordance with laws applicable to our business and the RATP Group's rules, failure to comply with these principles may result in disciplinary action and/or legal proceedings, both for the Group and the person at fault.

4 Consideration of stakeholders

- ▶ As a major player in the city, the RATP Group maintains a close relationship with all its stakeholders to strengthen its social, economic and environmental contribution to the city of tomorrow.
- ▶ It is supported by the RATP Group Foundation to facilitate access to employment, education, culture, and ecology.

Who is the Code of Ethics for?

The Code of Ethics is the common reference document for all our managers and employees worldwide, regardless of the continent or country where the RATP Group operates, in the diversity of cultures, as well as for all our customers and stakeholders.

- ▶ **All employees** must understand and adhere to the values, guiding principles and provisions set forth in this Code.
- ▶ **Our industrial and commercial suppliers and partners** are required to apply the usual standards recognised internationally, in particular with regard to their employees.
- ▶ **Managers** must comply with and implement this Code of Ethics and ensure that their teams have been informed of its existence and contents. They are the guarantors of dialogue and transparency, so that employees work in a climate of trust and feel free to talk openly about their concerns, and do not hesitate, where necessary, to use the tools at their disposal to report problems of which they are aware.

Our Employees

The RATP Group, through its values and guiding principles, pays particular attention to all its employees and the people who work for it.

The Group makes commitments to its employees and expects them to behave in an exemplary manner.

The RATP Group's commitments to its employees

OUR MANAGEMENT PRINCIPLES

The RATP Group's development and sustainability are based on the motivation and commitment of its employees as part of a managerial dialogue and a dynamic social dialogue. The Group has implemented a responsive human resources policy, based on consideration, mutual respect, trust and listening.

HEALTH, SAFETY AND WELL-BEING AT WORK

Everyone is entitled to do their job in a working environment that respects their physical and mental health and safety, in conditions that allow everyone to be and to feel good at work.

THE QUALITY OF PERSONAL RELATIONSHIPS AT WORK

Women and men in the RATP Group have the right to respect for their dignity in their professional environment. No one shall be subjected to any form of harassment, whether psychological or sexual, any sexist acts or acts of violence at work.

DIVERSITY AND NON-DISCRIMINATION

Diversity, equal opportunity, openness and solidarity are fundamental guiding principles for the RATP Group. The RATP Group intends to be a reflection of the regions and communities it serves. It complies with the laws and culture of the countries where it operates, both in France and abroad.

RESPECT FOR NEUTRALITY

The RATP Group respects the right of employees to get involved in associative, civic and political life. These activities are carried out on a personal basis. The RATP Group is committed to complete political, philosophical, religious and union neutrality.

RESPECT FOR PRIVACY AND PROTECTION OF PERSONAL DATA

The RATP Group is committed to respecting the confidentiality of its employees' personal data as part of their professional activities. This data must correspond only to the purposes for which they are collected under the national laws of the countries concerned. They are collected only when they are essential to the functioning of the group's activities. They are stored securely and only for the time necessary.

INFORMATION AND COMMUNICATION TECHNOLOGIES

All software and data produced, exchanged or processed using the Group's systems or digital communication tools are deemed intended for our professional activities and deemed to be the property of the RATP Group, unless specially exempted as provided by subcontracts. The RATP Group supports its employees with digital transformation, a key issue for performance and efficiency at work, and also with reconciling work and personal life.

The behaviour expected of employees

The exemplary behaviour expected of employees first of all concerns compliance with laws and regulations. Any failure to do so may have serious financial, legal, civil and/or criminal consequences for both the company and the offending employee.

In a global and complex legal environment, integrity is becoming essential to the success and sustainability of the entire Group. It guarantees its reputation. The RATP Group makes various guidelines and standards available to its employees to help them behave in the expected ethical way.



Rejection of any illegal business practice

The RATP Group strives to create and maintain a culture of trust, loyalty and transparency that does not tolerate any illegal business practice. The Code of Business Conduct and Prevention of Corruption sets out the principles to be followed by any persons exposed to such risks, be they Group employees or people working for the Group on an occasional basis.

Rejection of corruption and influence peddling: RATP Group employees must refrain from any form of corruption and influence peddling, whether active or passive, with private individuals or public officials. No company or employee shall solicit or accept an advantage in order to perform an act within their remit.

Each employee undertakes to comply with the rules set by the Group regarding gifts, hospitality, and all forms of benefits. The same applies to the Group's rules regarding political funding, patronage, sponsorships and charity work. Group employees are prohibited from making any facilitation payments.

Combatting fraud: The RATP Group and its employees are committed to effectively combatting all forms of fraud. To this end, they must strictly comply with the law and procedures put in place within the Group.

Compliance with competition law: The Group and its employees are committed to complying with the rules of competition law, competition which must be exercised wherever the Group operates in total freedom and without restriction.

Prevention of any potential conflict of interest: Each employee agrees to exercise the greatest vigilance regarding any conflict of interest in compliance with the rules set by the Group.



Contribution to health, quality of life at work and the environment

Health and safety is everyone's business and requires everyone's commitment for the benefit of all. Mutual respect between employees is fundamental. This is an essential prerequisite for working together. Each employee undertakes to respect the rights of his or her colleagues and to ensure respect for privacy. Each employee undertakes to implement at his or her level the RATP Group's strategic guidelines on sustainable development and respect for the environment.



Contribution to safety and security

Everyone in the company must make an active contribution to safety and security. Each employee contributes to the security and integrity of systems, media and information.



Use of social media

Everyone must remain “professional and responsible” at all times when using social media, even personally, and must refrain from any contribution likely to damage the reputation or interests of the RATP Group.



Respect for the professional use of the Group’s property and assets.

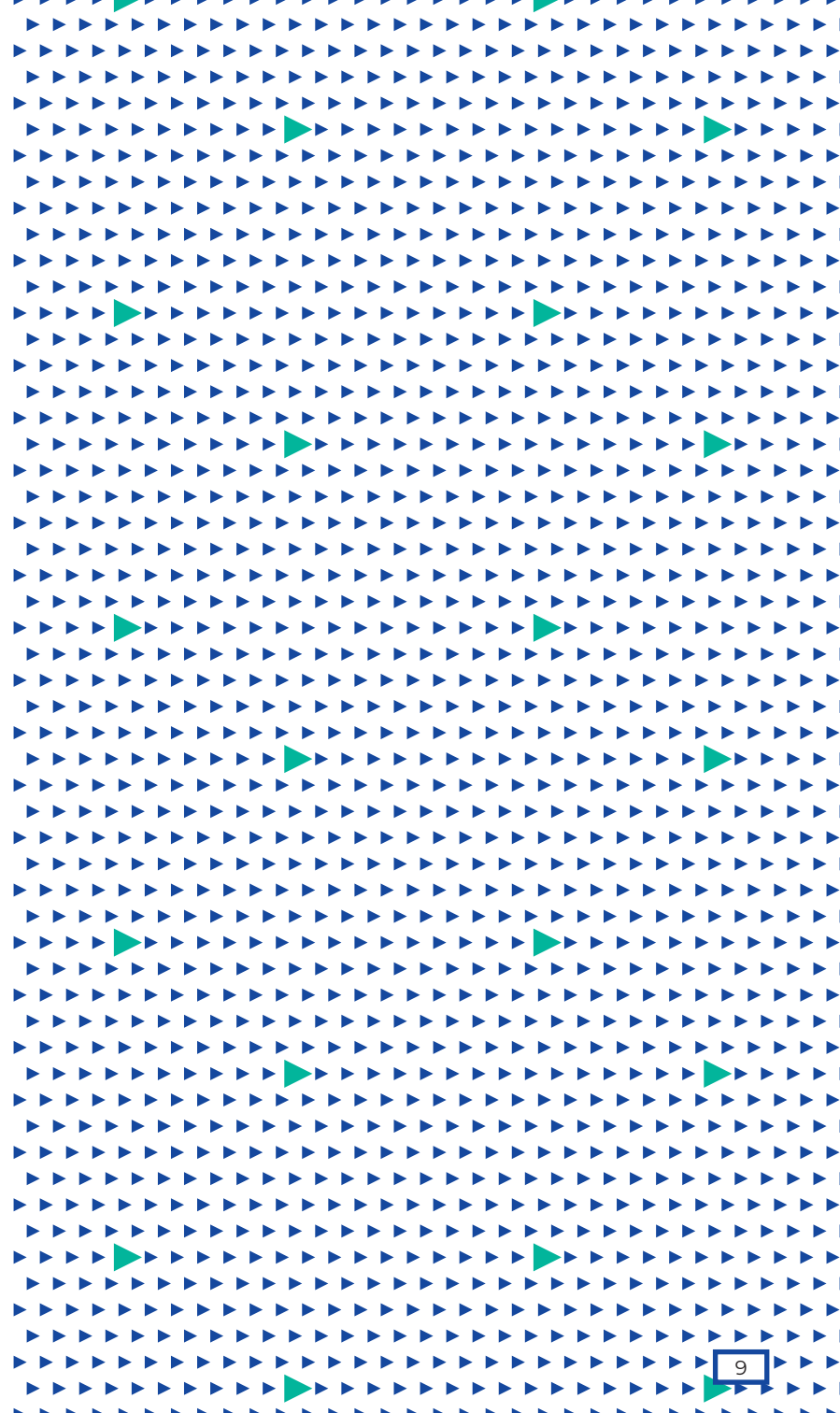
It is the duty of every employee to demonstrate integrity with regard to the Group’s assets, which include in particular infrastructure, equipment, IT and telecommunications equipment, supplier lists, customer files and any sensitive information on markets and business practices.



Duty of loyalty and confidentiality

Each employee is subject to an obligation of loyalty to the Group. The disclosure of confidential information may cause significant economic or reputational damage to the RATP Group, its employees, customers and suppliers.

Each employee holding such information is subject to an obligation of confidentiality that applies to all information concerning the Group, its suppliers, partners and customers.



Our customers

The RATP Group is dedicated to satisfying its customers worldwide, in respect of their diversity, as they are, one way or another, concerned by the Group's mobility activities or partners in smart cities.

The Group maintains a culture of partnership, as well as listening to and understanding the specific needs of each customer.

The RATP Group focuses primarily on the satisfaction of its passenger customers

The company's success depends on the respect and satisfaction of our passenger customers. We owe them an exemplary service in terms of safety, security, quality, comfort and performance. Through listening to them and meeting their expectations to the best of our ability, we will ensure the sustainability of our Group.

The security of our facilities and personal safety are two essential requirements to ensure our transport activities. They also help us to win and maintain the confidence of our passengers. Our know-how and reputation in this area constitute our most valuable assets.

The RATP Group designs, builds, maintains and operates public transport networks with this absolute safety requirement. Ensuring the safety of our facilities and our transport equipment is one of the company's top priorities. To do this, it relies on many existing regulations and is governed by many procedures.

The RATP Group seeks the satisfaction of organising authorities

We must share with our organising authorities and local elected officials the benefits of our experience as a public transport operator, our global knowledge of urban issues and our engineering expertise.

We are a major player in terms of local development and social cohesion.

Our Stakeholders

The RATP Group maintains relationships of trust, loyalty and transparency with all its stakeholders.

It is in everyone's interest to develop and maintain relationships based on trust, transparency and partnership. We ensure that the people we work with are committed to respecting the law, but also our ethical requirements, integrity standards and usual standards.

The RATP Group Foundation, a tool for our stakeholders

The RATP Group Foundation participates directly in the Group's social responsibility policy through its two missions:

- ▶ Develop links with the territories where they are located, while contributing to their social and economic dynamic;
- ▶ Foster employee engagement in the public interest.

It facilitates and enhances the capacity for action and sense of commitment on a daily basis of all Group employees. In conjunction with Group management and operational management, it implements arrangements to facilitate the voluntary involvement of employees to serve the public interest.

The RATP Group is firmly committed to combatting money laundering

The RATP Group complies with all relevant laws and regulations. Each employee is vigilant and alerts the compliance department in case of doubt.

The RATP Group carries out responsible and transparent lobbying activities

In the course of its activities, the RATP Group may be called upon to interact, whether orally or in writing, with a public decision-maker in order to influence decision-making. In this respect, the Group is committed to implementing and complying with local rules in force. Responsible and transparent lobbying can usefully inform public decisions.

The RATP Group seeks to improve its exemplary environmental policy

The RATP Group intends to be exemplary and adheres to environmental commitments that are at the heart of its sustainable development policy. It seeks to reduce its environmental footprint, by saving resources (water, energy, paper, etc.), promoting and protecting biodiversity, reducing the pollution associated with its activities and infrastructure in particular to respect the environment and the health of employees, passengers and local residents.

We promote the development and dissemination of environmentally-friendly technologies. We invest for future generations by developing and offering sustainable, efficient and safe solutions. To this end, we design systems and solutions that save on resources and energy. We are committed every day to being a more ethical player and to anchoring environmental protection at the heart of our action.

RATP is committed to responsible communication

We aim to have a responsible communication policy and are careful to take into consideration social and environmental aspects in any form of communication to provide the public with accurate and trustworthy information. This requirement also applies to the financial documents we produce that give a true and fair view of our assets and the Group's financial position. We must guarantee the integrity of our data.

The RATP Group is committed to mobility for the benefit of all

Mobility is a major societal issue, assessed differently in different countries. In our universal accessibility policy, our objective is to pay particular attention to vulnerable people with special needs. Depending on the local context, we maintain a permanent and continuous dialogue with all stakeholders concerned with accessibility. We are committed, with our trained staff, to promoting the autonomy of the most vulnerable in transport, by providing mobility education for all, digital solutions, adapted and innovative facilities.

The RATP Group expects its stakeholders, in return, to respect the commitments undertaken

Our suppliers are required to ensure that their own suppliers and subcontractors comply with standard principles and are particularly careful to comply with human rights and environmental standards and procedures.

With due respect for the sovereignty of the countries in which we operate, and without interfering in the functioning or financing of local political life, the RATP Group reserves the right to express to governments, where appropriate, its position on matters concerning its activities, employees and shareholders, as well as its convictions regarding the importance of respect for human rights and in particular respect for women.

Three approaches to ethical conduct

Faced with a delicate situation, when in doubt, the recommended attitude is:

1 Use discretion: ask myself four simple questions

- ▶ Does my action or decision comply with the law?
- ▶ Does my action or decision comply with the Code of Ethics and the rules of my profession, where applicable?
- ▶ Could my action or decision have a negative impact, in financial or reputational terms, on the company, my work colleagues or my stakeholders?
- ▶ Am I ready to take responsibility for my action or decision in a transparent manner if it becomes known?

2 Do not keep a problem to yourself and do not hesitate to seek advice

- ▶ If the issue or dilemma remains, do not hesitate to talk to colleagues or your local manager or Human Resources manager.
- ▶ HR and legal services are there to help you.

3 Enquiring and reporting

- ▶ Ethics, compliance and CSR officers are also available to provide you with information and advice.
- ▶ Finally, the whistleblowing system is available to you.

Stakeholders in ethics, compliance and CSR

On January 1, 2017 the Ethics, CSR and Compliance Committee (CERSEC) was set up. It is chaired by the Group Chairwoman and Chief Executive Officer and is composed of the members of the Executive Committee and the heads of the Ethics, CSR and Compliance functions. Its main mission is to ensure that the ethical dimension and the effectiveness of compliance and CSR programmes are taken into account in the implementation of strategic guidelines and major operational decisions. The General Delegation for Ethics provides the secretariat of the CERSEC. RATP Dev has a Compliance and Ethics Committee responsible for ensuring that all employees respect the principles of ethics and compliance.

ETHICS

The General Delegation for Ethics pursues a policy of development and awareness of the ethical culture, for which it is the guarantor. It ensures that all Group employees respect the company's values, while ensuring that everyone behaves with integrity and in accordance with its values.

COMPLIANCE

The compliance department establishes and implements the RATP Group's compliance programme. It is responsible for helping to align the Group with the world's best standards, particularly in terms of combatting corruption and complying with competition rules.

CSR

The CSR (Corporate Social Responsibility) department confirms the RATP Group's commitment to sustainable development and encourages a responsible approach for carrying out activities by incorporating environmental, social and societal considerations. For this purpose, the CSR Club aims to deploy the CSR roadmap and disseminate a CSR culture within the Group.

DATA PROTECTION OFFICER

The Data Protection Officer is responsible for implementing compliance with the European General Data Protection Regulation (GDPR) within the RATP Group with regard to all data processing implemented by the Group.

The whistleblowing system

We encourage a climate of dialogue and trust that allows everyone, with the support of their superiors, to express their views and concerns.

If you notice a breach of the law or behaviour that does not comply with our values, your main contact is your supervisor or the Human Resources department.

The whistleblowing system set up by RATP Dev is not intended to replace other existing systems.

This additional system is available to employees and collaborators, both external and occasional (apprentices, interns, temporary workers, external service providers), acting in good faith and selflessly, victims or witnesses of facts which they consider particularly serious and which could, in their view, have significant consequences for individuals or for the Group itself or one of its subsidiaries.

The whistleblowing system put in place guarantees strict confidentiality of the whistleblower's identity. In addition, the latter is protected against any retaliatory measures related to the issuing of the alert as long as he or she acts selflessly and in good faith and has personal knowledge of the facts.

Any misuse of the whistleblowing system, however, when done in bad faith or in a self-interested manner, may result in disciplinary action and legal proceedings.

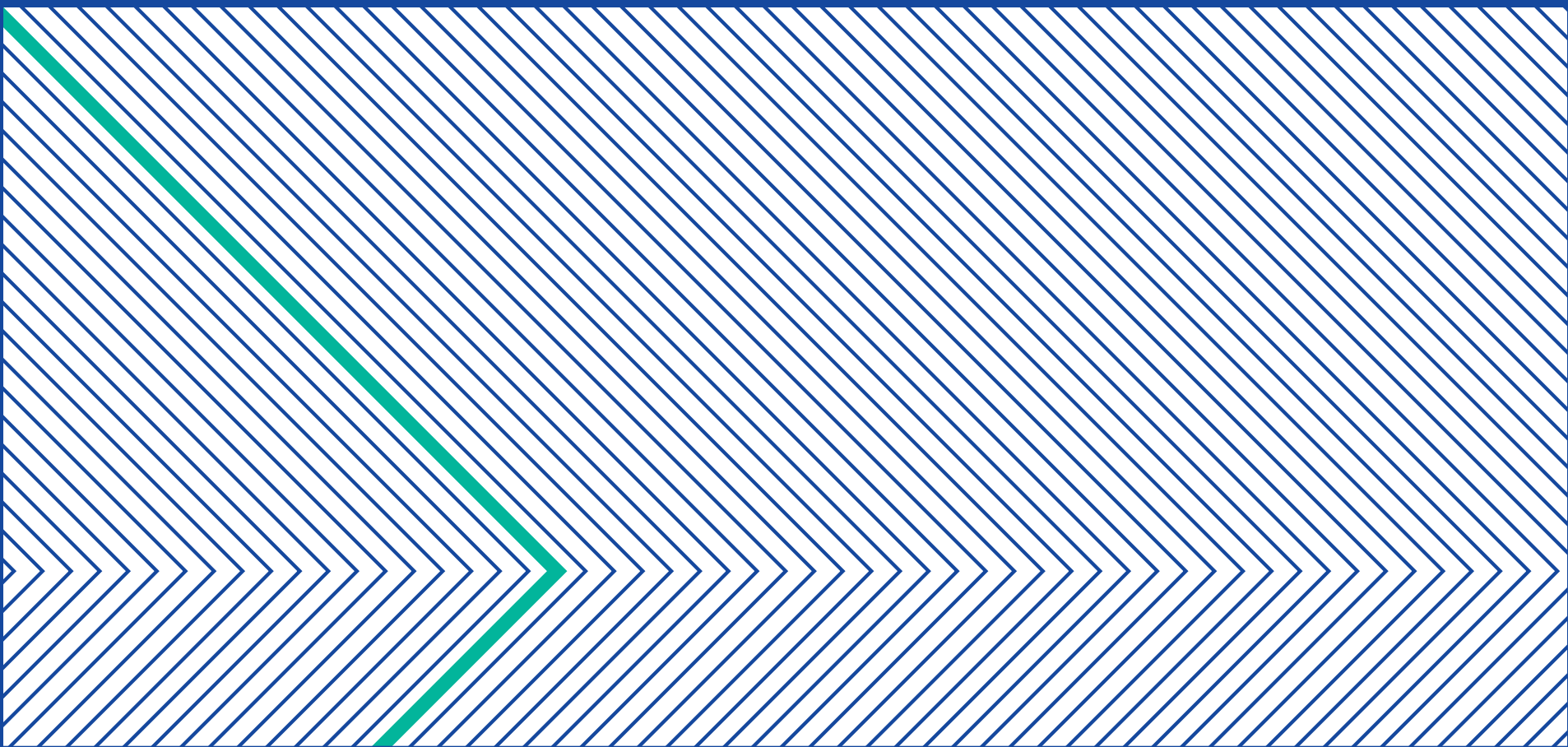
To issue an alert, you may contact your Local Ethics Officer who has a dedicated email address or the Compliance and Ethics Committee via the following email address: compliancealert@ratpdev.com.

Please refer to the practical arrangements for using the whistleblowing system, as defined locally.

Our standards

THE RATP GROUP ADHERES TO:

- ▶ The principles of the Universal Declaration of Human Rights
- ▶ The principles of the United Nations Global Compact
- ▶ The principles of the OECD Convention of 17 December 1997 on Combating Bribery of Foreign Public Officials in International Business Transactions
- ▶ The principles of the International Labour Organization conventions
- ▶ The United Nations Charter on women's employment
- ▶ The UITP (International Union of Public Transport) Sustainable Development Charter
- ▶ The Charter for the Sustainable Development of Public Institutions and Public Enterprises
- ▶ Transparency International
- ▶ The Diversity Charter



For more information visit
www.ratp.fr

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