



ALCATEL-LUCENT: A CULTURE OF BUSINESS INTEGRITY NEW HIRE ON-BOARDING

May 2014

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AT THE SPEED OF IDEAS

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Business Integrity at Alcatel-Lucent

A Message From Our CEO



"Acting with integrity and transparency is critical as Alcatel-Lucent implements The Shift Plan. Our goals must be achieved with the highest levels of business integrity."

Alcatel-Lucent will rigorously maintain its zero tolerance policy for any unethical behaviour within the company. It is important for all of us and for our customers, shareholders, business partners, and our long-term success."

Michel Combes
Chief Executive Officer

Business Integrity at Alcatel-Lucent

Business Integrity – An IMPERATIVE for long-term SUSTAINABILITY

As a company, WE COMPLY with all requirements that govern our global business

For employees, complying with our CODE OF CONDUCT and its underlying policies is the foundation of the company's commitment to ethical business conduct

We rigorously uphold our ZERO TOLERANCE policy for all unethical behavior

We collaborate and do business only with PARTNERS who share OUR VALUES
ACTING WITH INTEGRITY AND TRANSPARENCY is essential for our Shift Plan

Our goals must be achieved with HIGHEST LEVELS OF BUSINESS INTEGRITY

An ETHICAL CULTURE is important for our company, customers, shareholders, business partners and for our LONG-TERM AND SUSTAINED SUCCESS

**ZERO TOLERANCE POLICY FOR COMPLIANCE VIOLATIONS IS
A BUSINESS IMPERATIVE AND A COMPETITIVE ADVANTAGE**



Business Integrity at Alcatel-Lucent

Ethical Behavior – CONSISTENT with our CODE OF CONDUCT

THIRD PARTY SCREENING

We do business with responsible partners who share our values and meet our screening requirements

ANTI-CORRUPTION

We avoid violation of our Anti-Corruption Policies and Procedures

BRIBERY

We never pay, offer or promise to provide money, favors or anything of value to obtain or retain business

REVENUE RECOGNITION

We ensure financial transparency, integrity and accountability



GIFTS

We comply with ALU's new Corporate Gift-Giving Policy

INTELLECTUAL PROPERTY

We ensure compliance with all IP requirements

CONFLICTS OF INTEREST

We avoid all actual and apparent conflicts of interest in our business dealings

HOSPITALITY/ ENTERTAINMENT

We comply with appropriate travel, hospitality and entertainment requirements

*For questions, contact your manager or visit the Compliance Organization Web Site
<http://all.alcatel-lucent.com/wps/portal/obic> for additional information, guidance and resources*

Business Integrity at Alcatel-Lucent

What is expected of me?

All employees and non-employee contract workers are required to review and comply with the Alcatel-Lucent Code of Conduct and complete all required compliance training.

New Hires will be notified by email to complete key compliance initiatives. Emails contain instructions and access links for each initiative. New hires may also be notified to take additional required compliance training based upon job function to ensure knowledge of all job-related policies and procedures. New hires should talk to their manager to discuss questions regarding training and other requirements.

Managers are responsible to ensure that their new hires complete all required compliance initiatives timely. To implement this requirement, managers must follow the applicable offline process for any new hire who does not have an email address or network access.

Resources available from the Compliance Organization Website:

- ☐ **Training Roadmap** - Provides a list of required new hire compliance initiatives
- ☐ **Compliance Training** - Provides instructions on the offline training process
- ☐ **Compliance Guidelines** - Available for employees and people managers
- ☐ **Business Integrity Decision Aid** - To support ethical business decision-making



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