

**Client:** Plastic Omnium

**Project:** Plastic Omnium

**Document:** Storyboard (WBT)

**Module**: Understanding Corruption

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **Launch** | | **Page Number** | | **01** |
| **Template Type** | **Animation** | | **Duration** | | **30 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| Welcome to the module - Understanding Corruption. This module provides the information about the rules of anti-corruption in Plastic Omnium. | | Welcome to the module **UNDERSTANDING CORRUPTION**  **Duration**: 20 minutes  This module contains audio. Please use headphones and/or adjust the volume, so that others working around you are not disturbed.  *Select* ***Start*** *to begin the module.*  Start | | **GLOBAL**:   * All reference images are from Shutterstock, unless when external website links or client source references are given. * Use modern looking images for background. * Please use modern-looking icons that are in-line with the project’s look and feel. * Include a suitable graphic for the cover. Some images are being shown here. * Please show a collage of these images.     SS ID: 580074049    SS ID: 2003639879  Open envelope with Job offer message. Flat design vector illustration.  SS ID: 1027409377  Contract bribe concept. Businessman pay for contract. Corruption in business.  SS ID: 1611072637   * Provide Start button to launch module. | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **Welcome** | | **Page Number** | | **02** |
| **Template Type** | **Interactive (Click to View)** | | **Duration** | | **90 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| Let’s begin with a fun question. This is John and he is an employee at Plastic Omnium. | | - | | Fade in the image in sync with the VO.    SS ID: 607232516 | |
| Here are three scenarios involving John. In your opinion, in which of these scenarios would John be violating the Plastic Omnium code of conduct and compliance policies? | | In your opinion, in which of these scenarios would John be violating the Plastic Omnium code of conduct and compliance policies?  *Select the option(s) that are violations and then select* ***Submit****.*   1. A supplier has offered John and his family two tickets for VIP seats at Rihanna’s next concert. John accepts the offer because his wife is a fan of the singer. 2. As HR manager for a country, John is looking for a reliable temporary staffing agency to meet our business needs. Luckily, John knows of such a company because his wife is the general manager. He decides to hire this agency without consulting anyone else in Plastic Omnium. 3. Having faced many difficulties in the import of equipment for his plant, John decided to hire a broker to take charge of submitting all paperwork and payments to the customs authorities. John is happy to pay the broker because the import was handled swiftly, even though he found the cost a little high – especially an amount of €15,000 under “miscellaneous“ in the customs broker’s invoice. | | * Fade in the OST with the VO. * All three scenarios are correct. * Provide only one attempt. * Display back and next arrows – with the next button disabled. | |
| - | | Great! You seem to be aware of our code of conduct and compliance policies. John violated the code of conduct in all three scenarios.  *Select this  to find out the underlying reasons.* | | * Provide this feedback if the learner selects all the three options. * Make the information icon clickable. | |
| - | | Good job! You’re on the right track, but not quite there yet! John violated the code of conduct in all three scenarios.  *Select this  to find out the underlying reasons.* | | * Provide this feedback if the learner selects one or two options. * Make the information icon clickable. | |
| - | | **Scenario 1 is a violation because** – Accepting any gift of more than a nominal value or any invitation beyond what is customary, gives the appearance of a conflict of interest. An employee should inform their manager when they receive such a gift or invitation. In addition, an invitation to a performance or any other kind of event must always be declined if the supplier will not be attending. Please refer to the Plastic Omnium policy on gifts and invitations on TOPNET.  **Scenario 2 is a violation because** – John is not in compliance with the code of conduct as he took the decision to hire this company without informing his manager of the potential conflict of interest. The situation would be different if John informed his manager, his wife’s company then participated in a call for tender, and John took no part in the decision to hire that company. Please refer to the Plastic Omnium policy on conflict of interest on TOPNET.  **Scenario 3 is violation** because there is a strong suspicion that a bribe was paid to the authorities to expedite the process through the undocumented payment of 15K Euro. Plastic Omnium is liable for all acts of bribery committed directly by its employees or indirectly by any intermediaries. Please refer to the Plastic Omnium policy on intermediaries on TOPNET. When using an intermediary, such as a customs broker, we need to:   * Conduct due diligence, * Formalize an agreement that includes Plastic Omnium anti-corruption clauses, * Check that the payment corresponds to legitimate services, and * Maintain detailed records concerning the intermediary and payments made. | | * On clicking the information icon, entire content will appear as a pop-up text. * Show the pop-up text on one side of the screen so that the three scenarios are visible. | |
| - | | *Select* ***Next*** *to continue.* | | * Enable the **Next** button. * Upon selecting the **Next** button, move to the next page. | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **Overview and Objectives** | | **Page Number** | | **03** |
| **Template Type** | **Animation** | | **Duration** | | **30 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| Anti-corruption comprises activities that oppose or inhibit corruption. Just as corruption takes many forms, anti-corruption efforts vary in scope and in strategy. | | Anti-corruption comprises activities that oppose or inhibit corruption | | Show the image and OST in sync with the VO.  Anti corruption concept. Hand giving money bills to another through handshake. Handcuffed handshake with world map in the background. Flat design  SS ID: 377783506 | |
| In this module, we will focus on the key aspects of anti-corruption and the steps taken to prevent corrupt practices at Plastic Omnium. | | We will focus on the:   * Key aspects of anti-corruption * Steps taken to prevent corrupt practices at Plastic Omnium | | Retain the previous image and show OST in sync with the VO. | |
| - | | - | | Clear the screen. | |
| After completing this module, you will be able to:   * Explain what corruption is, * Identify who can corrupt or who can be corrupted, * Outline the relevant sanctions, and * List the measures taken at Plastic Omnium to prevent and detect corruption. | | After completing this module, you will be able to:   * Explain what corruption is. * Identify who can corrupt or who can be corrupted. * Outline the relevant sanctions. * List the measures taken at Plastic Omnium to prevent and detect corruption. | | * Show a dartboard icon.     SS ID: 663320743   * Show stem sentence and list of objectives in sync with VO. | |
| Let’s begin. | | - | | Play VO. | |
| - | | *Select* ***Next*** *to continue.* | | * Enable the **Next** button. * Upon selecting the **Next** button, move to the next page. | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **International Framework Against Corruption** | | **Page Number** | | **04** |
| **Template Type** | **Animation** | | **Duration** | | **90 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| An international framework with global impact is in place— | | International framework | | Show the icon and OST in sync with the VO.    SS ID: 333104585 | |
| —that is designed to fight corruption. | | Fight corruption | | Add the icon and OST in sync with the VO.    SS ID: 1838432296 | |
| - | | - | | Clear the screen. | |
| Signed in 1997 as an Organisation for Economic Co-operation and Development (OECD) convention, the international framework— | | Organisation for Economic Co-operation and Development (OECD) | | Show a calendar with 1997 and OST next to it in sync with the VO.  [Show 1997 written on the calendar]  SS ID: 1926884648 | |
| —initially focused on combating bribery of foreign public officials in international business transactions. | | Focused on combating bribery of foreign public officials in international business transactions | | Show the OST in sync with the VO along with the icon.    SS ID: 662298730 | |
| In 2009, more recommendations were added to this framework by the OECD to further combat bribery. | | More recommendations were added to the international framework by the OECD | | Change the calendar to the year 2009 and show OST next to it in sync with the VO.  [Show 2009 written on the calendar] | |
| - | | - | | Clear the screen. | |
| Over the years, in the wake of this convention, individual countries have passed national laws to prohibit corruption. | | National laws to prohibit corruption: | | Show the image and OST with the VO.    SS ID: 1439691389 | |
| Most of these laws, such as the UK Bribery Act, the US Foreign Corrupt Practices Act (FCPA), and the Loi Sapin-II in France, also possess extra-territorial effects to fight corruption anywhere in the world. | | * UK Bribery Act * US Foreign Corrupt Practices Act (FCPA) * Loi Sapin-II in France | | Retain the previous image and add OST in sync with the VO. | |
| These laws require companies to have an effective compliance programme to prevent and detect bribery. | | Effective compliance programme to prevent and detect bribery | | * Remove the previous image and OST. * Show the set of icons and OST in sync with the VO.     SS ID: 527829151 | |
| Most national laws have extended the fight against corruption— | | Fight against corruption | | Retain the previous set of icons and show OST in sync with the VO. | |
| —to the actions of employees and agents of private businesses. | | - | | Show the image with the VO.    SS ID: 2003639879 | |
| Various national authorities are working together, formally or informally, to eradicate the effects of corruption on international business. | | - | | Retain the previous screen and show a stop sign over the image with the VO.    SS ID: 1077922790 | |
| - | | *Select* ***Next*** *to continue.* | | * Enable the **Next** button. * Upon selecting the **Next** button, move to the next page. | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **What Is Corruption?** | | **Page Number** | | **05** |
| **Template Type** | **Interactive (Click to View)** | | **Duration** | | **60 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| Now let’s understand what “corruption” means. In the simplest terms, corruption is the misuse of entrusted power for private gain. | | Corruption is the misuse of entrusted power for private gain. | | Show the image and OST in sync with the VO.  [Do not show Dollar sign on currency notes]  SS ID: 1118624414 | |
| Corruption can be of two types: Active and Passive. | | - | | * Move the previous image and OST to one half of the screen and fade in two tabs – **Active Corruption** and **Passive Corruption** on another half of the screen. * Make these two tabs clickable. | |
| Select each tab to learn more. | | *Select each tab to learn more.* | | Fade in the i-text in sync with the VO. | |
| Active corruption occurs when one person promises or gives money or any other benefit to another person for performing duties that derive solely from that person’s position. For example, a person may offer money or some other benefit to a customs agent because of their position as a customs agent. | | Active corruption occurs when one person promises or gives money or any other benefit to another person for performing duties that derive solely from that person’s position. For example, a person may offer money or some other benefit to a customs agent because of their position as a customs agent. | | * Show the OST as a pop-up text on one half of the screen with the VO when learner clicks on the **Active Corruption** tab. * Show the image on another half of the screen and highlight the person on the left in the image. | |
| Passive corruption occurs when a person accepts money or any other benefit as a reward for performing certain actions. | | Passive corruption occurs when a person accepts money or any other benefit as a reward for performing certain actions. | | * Show the OST as a pop-up text on one half of the screen with the VO when learner clicks on the **Passive Corruption** tab. * Show the image on another half of the screen and highlight the person on the right in the image. | |
| - | | *Select* ***Next*** *to continue.* | | * Enable the **Next** button. * Upon selecting the **Next** button, move to the next page. | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **Who Can Corrupt and Who Can Be Corrupted?** | | **Page Number** | | **06** |
| **Template Type** | **Animation** | | **Duration** | | **60 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| At Plastic Omnium, an act of bribery occurs when an employee of Plastic Omnium or another person on behalf of Plastic Omnium offers money or any other benefit to someone in order to obtain an advantage through that person performing or refraining from a specific behaviour in the course of their duties— | | An act of bribery occurs when an employee or another person on behalf of Plastic Omnium offers money or any other benefit to someone in order to:   * Obtain an advantage through that person * Refraining from a specific behaviour during their duties | | * Show the image and OST in sync with the VO.   [Do not show Dollar sign on currency notes]  SS ID: 1118624414   * Label the person on left in the image as **Plastic Omnium**. * Show the person the left giving money when VO says – “**Plastic Omnium offers money**” and then gift can appear next to the person when VO says – “**or any other benefit to someone**” | |
| —regardless of the acceptance or receipt of the benefit and of the result obtained. | | Regardless of the acceptance or receipt of the benefit and of the result obtained | | Retain the previous image and show OST next to the person on the right in the image. | |
| - | | - | | Clear the screen. | |
| So, who can be corrupted?  Any public official (that is, any person with a legislative, administrative, or judicial position), | | Public officials | | Show the image and OST around the image.  Group of business men and women, working people. Business team and teamwork concept. Flat design people characters.  SS ID: 650341033 | |
| any public function official or agent of a public organization, | | Public function official or agent of a public organization | | Show OST around the above image. | |
| employees of state-owned enterprises, | | Employees of state-owned enterprises | | Show OST around the above image. | |
| and employees or agents of a private business can be corrupted. | | Employees or agents of a private business | | Show OST around the above image. | |
| - | | *Select* ***Next*** *to continue.* | | * Enable the **Next** button. * Upon selecting the **Next** button, move to the next page. | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **Liability of Plastic Omnium** | | **Page Number** | | **07** |
| **Template Type** | **Animation** | | **Duration** | | **60 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| Plastic Omnium is liable for acts of bribery committed— | | Plastic Omnium is liable for acts of bribery committed: | | Show the organization icon and OST in sync with the VO.  [Please add Plastic Omnium on top of building]  SS ID: 1377561629 | |
| —directly by its employees or— | | * Directly by its employees | | * Create one branch from the previous icon and show the employee icon given below. * Add the OST as bullet point under the lead-in line.     SS ID: 255118591 | |
| —indirectly by any third party, which may include intermediaries such as agents, consultants, contractors, and brokers (for example, customs brokers) or even joint venture partners. | | * Indirectly by any third party | | * Create another branch from the previous icon and show the third party icon given below. * Add the OST as bullet point under the lead-in line.   Group of business men and women, working people. Business team and teamwork concept. Flat design people characters. | |
| In situations of bribery or any other form of corruption, no defense claiming that Plastic Omnium was unaware of the actions of a third party is acceptable, — | | No defense is acceptable claiming Plastic Omnium was unaware of the actions of a third party | | * Continue the previous image and fade out the employee icon. * Combine the organization icon and third party icon and add OST next to it in sync with the VO. | |
| —because we, as an organization, would be deemed to have knowledge if we:   * Were aware of a “high probability” that prohibited conduct would occur or | | Plastic Omnium would be deemed to have knowledge if we:   * Were aware of a “high probability” that prohibited conduct would occur | | Retain the previous image and add OST under the lead-in line in sync with the VO. | |
| * Demonstrated a conscious disregard, willful blindness, or deliberate ignorance of prohibited conduct (in brief, if we turned a blind eye to third-party conduct). | | * Demonstrated a conscious disregard, willful blindness, or deliberate ignorance of prohibited conduct. | | Retain the previous image and add OST to the bulleted list in sync with the VO. | |
| Note: Reasonable and appropriate due diligence can play a crucial role in identifying prohibited conduct. | | Reasonable and appropriate due diligence can play a crucial role in identifying prohibited conduct. | | Fade in the icon and show OST in sync with the VO.    SS ID: 1902132976 | |
| - | | - | | Clear the screen. | |
| Furthermore, it is important to consider that prohibited conduct need not be fully concluded or successful to create liability for Plastic Omnium. | | Prohibited conduct need not be fully concluded or successful to create liability for Plastic Omnium. | | Show the image and add OST next to the person on the right (accepting the bribe) in sync with the VO.  [Do not show Dollar sign on currency notes]  SS ID: 1118624414 | |
| The offer or promise of a benefit to someone is sufficient even if that person: | | An offer/promise of benefit is sufficient even if that person: | | * Move the previous image to one side of the screen and remove the previous OST. * Fade in the lead-in line in sync with the VO. | |
| * Had no power, right, or opportunity to perform or not to perform any act in relation to which the benefit was offered or given, | | * Had no power or opportunity to perform or not perform the act in relation to which the benefit is offered | | Add OST under the lead-in line in sync with the VO. | |
| * Did not accept the benefit, or | | * Did not accept the benefit | | Add OST to the bulleted list in sync with the VO. | |
| * Failed to perform or not to perform any act in relation to which the benefit was offered or given. | | * Failed to perform or did not perform the act in relation to which the benefit is offered. | | Add OST to the bulleted list in sync with the VO. | |
| For further information, you can refer to the Plastic Omnium group policy on managing relationships with intermediaries on TOPNET and apply the Golden Rules when using intermediaries such as customs brokers. | | Refer to the Plastic Omnium group policy on managing relationships with intermediaries on TOPNET and apply the Golden Rules when using intermediaries such as customs brokers. | | Fade in the icon and show OST in sync with the VO.    SS ID: 1902132976 | |
| - | | *Select* ***Next*** *to continue.* | | * Enable the **Next** button. * Upon selecting the **Next** button, move to the next page. | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **Anti-corruption Compliance** | | **Page Number** | | **08** |
| **Template Type** | **Animation** | | **Duration** | | **60 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| Preventing corruption, like safety, is everyone’s business, and therefore when using intermediaries such as customs brokers, you must, | | Prevent corruption when using intermediaries by: | | * Build the infographic given below.     SS ID: 1719390877   * Show in OST inside the center circle of the infographic. | |
| * Conduct due diligence, | | Conducting due diligence | | Add the icon and OST in 01 of the infographic in sync with the VO.    SS ID: 1337290151 | |
| * Formalize an agreement that includes Plastic Omnium anti-corruption clauses, | | Formalizing an agreement | | Add the icon and OST in 02 of the infographic in sync with the VO.    SS ID: 302620247 | |
| * Monitor and audit the intermediary during the term of the contract, | | Monitoring and auditing the intermediary | | Add the icon and OST in 03 of the infographic in sync with the VO.    SS ID: 478003201 | |
| * Check that all payments correspond to legitimate services, and | | Checking payments | | Add the icon and OST in 04 of the infographic in sync with the VO.  Many receipts and hand holding magnifying glass. Many bills, checks and magnifier. Budget, finances, financial analysis, income and expenses, accounting concept. Modern flat design vector illustration  SS ID: 495947983 | |
| * Maintain detailed records concerning the intermediary and payments made. | | Maintaining detailed records | | Add the icon and OST in 05 of the infographic in sync with the VO.    SS ID: 608736026 | |
| - | | *Select* ***Next*** *to continue.* | | * Enable the **Next** button. * Upon selecting the **Next** button, move to the next page. | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **Different Forms of Bribery** | | **Page Number** | | **09** |
| **Template Type** | **Interactive (Click to View)** | | **Duration** | | **120 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| Accepting and offering benefits, advantages, and gifts and invitations are different types of corruption and bribery. | | - | | * Fade in three images with labels– **Benefits, Advantages, Gifts and Invitations** on the screen in sync with the VO.     **Benefits**  SS ID: 474877678  Contract bribe concept. Businessman pay for contract. Corruption in business.  **Advantages**  SS ID: 1611072637    **Gifts and Invitations**  SS ID: 2003639879   * Make these images clickable. | |
| Select each image to learn more. | | *Select each image to learn more.* | | Fade in the i-text in sync with the VO. | |
| Examples of benefits that qualify as bribery may be cash or cash equivalents (for example, gift cards); reimbursements; hosted travel, meals, or entertainment; scholarships; charitable contributions; offers of employment; donations; gifts; loans; fees; rewards; property; avoidance of a loss, liability, penalty, forfeiture, punishment, or other disadvantage; and other, non-monetary gifts. | | Examples of benefits that qualify as bribery may be:   * Cash or cash equivalents (e.g., gift cards) * Reimbursements * Hosted travel, meals, or entertainment * Scholarships * Charitable contributions * Offers of employment * Donations * Gifts * Loans * Fees * Rewards * Property * Avoidance of a   + loss   + liability   + penalty   + forfeiture   + punishment, or other disadvantage * Non-monetary gifts. | | Show the OST as a pop-up text in sync with VO on the one half and image on another half of the screen when learner clicks on the **Benefits** image. | |
| Examples of advantages that could be unduly obtained by Plastic Omnium are winning a contract or avoiding contract termination; influencing a procurement process; circumventing the rules for importation of products; evading taxes, duties, or penalties; obtaining exceptions to regulations; obtaining operational permits or business licenses; and gaining access to non-public bid tender information. | | Examples of advantages that could be unduly obtained by Plastic Omnium are:   * Winning a contract or avoiding contract termination * Influencing a procurement process * Circumventing the rules for importation of products * Evading taxes, duties, or penalties * Obtaining exceptions to regulations * Obtaining operational permits or business licenses * Gaining access to non-public bid tender information. | | Show the OST as a pop-up text in sync with VO on the one half and image on another half of the screen when learner clicks on the **Advantages** image. | |
| Gifts or invitations (to an event, restaurant, etc.) can be a mere courtesy and as such are an inherent part of business relations. However, they can often be perceived as corrupt practices and a means of influencing a decision in favour of Plastic Omnium. If you are the recipient of such a gift or invitation, please remember that it can also create a conflict of interest contrary to our policy. As a general rule, no gift should be given or received other than one of nominal value (such as stationery stamped with the logo of the company concerned or a box of chocolates for Christmas). An invitation for a meal can be accepted only if the meal is part of a professional activity – say, during a day of meetings – and is organized to discuss matters related to business. The key point is that no gift or invitation should induce the recipient to offer any reward in return, such as a commission or contract, or make them feel indebted to the giving party. For further information, you can refer to the Plastic Omnium group policy on gifts and invitations on TOPNET. | | * Gifts or invitations (to an event, restaurant, etc.) can be a mere courtesy and as such are an inherent part of business relations. However, they can often be perceived as corrupt practices and a means of influencing a decision in favour of Plastic Omnium. * If you are the recipient of such a gift or invitation, please remember that it can also create a conflict of interest contrary to our policy. * As a general rule, no gift should be given or received other than one of nominal value (such as stationery stamped with the logo of the company concerned or a box of chocolates for Christmas). * An invitation for a meal can be accepted only if the meal is part of a professional activity – say, during a day of meetings – and is organized to discuss matters related to business. * The key point is that no gift or invitation should induce the recipient to offer any reward in return, such as a commission or contract, or make them feel indebted to the giving party. * For further information, you can refer to the Plastic Omnium group policy on gifts and invitations on TOPNET. | | Show the OST as a pop-up text in sync with VO on the one half and image on another half of the screen when learner clicks on the **Gifts and Invitations** image. | |
| - | | *Select* ***Next*** *to continue.* | | * Enable the **Next** button. * Upon selecting the **Next** button, move to the next page. | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **Conflicts of Interest** | | **Page Number** | | **10** |
| **Template Type** | **Animation** | | **Duration** | | **60 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| As we have seen, a gift or an invitation received by a Plastic Omnium employee can also create a conflict of interest. | | A conflict of interest arises when an employee:   * Receives a gift or an invitation from a third-party. | | * Use the previous image from page 5.   [Show a person on left (man) holding a gift instead of money in his hand]  SS ID: 1118624414   * Show OST next to person on right in the image. | |
| A conflict of interest exists when Plastic Omnium employees have private or personal interests that are likely to influence their individual, impartial, or objective performance of professional duties within the company. | | * Has personal interests that are likely to influence their objective performance of duties. | | Retain the previous image and show OST next to person on right in sync with the VO. | |
| - | | - | | Clear the screen. | |
| Examples of conflict of interest are receiving compensation such as a gift,— | | Examples of conflict of interest:   * Receiving gift | | * Show only the person on left (man) from the previous image. * Show the image around her. * Show OST in sync with the VO.     SS ID: 781371163 | |
| —an invitation, or a job offer for a family member from a supplier during a tender request— | | * Receiving an invitation or a job offer for a family member from a supplier | | * Add the image around the lady. * Show OST in sync with the VO.   Open envelope with Job offer message. Flat design vector illustration.  SS ID: 1027409377 | |
| —and buying goods or services provided by a company owned by one’s spouse or a family member or in which one’s spouse or a family member has a management role. | | * Buying goods or services provided by a company owned by one’s spouse or a family member | | * Add the image around the man to show extended family. * Show OST in sync with the VO.     SS ID: 1925993144 | |
| You can refer to the Plastic Omnium group policy on conflict of interest on TOPNET for further information. | | You can refer to the Plastic Omnium group policy on conflict of interest on TOPNET for further information. | | Fade in the icon and show OST in sync with the VO.    SS ID: 1902132976 | |
| - | | *Select* ***Next*** *to continue.* | | * Enable the **Next** button. * Upon selecting the **Next** button, move to the next page. | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **Sanctions** | | **Page Number** | | **11** |
| **Template Type** | **Interactive (Click to View)** | | **Duration** | | **60 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| To fight corruption, it is important to have in place adequate sanctions and reliable methods for detecting and addressing the offence. | | Sanctions and reliable methods for detecting and addressing offence in: | | Show the image and OST in sync with the VO.    SS ID: 1127992499 | |
| Let’s explore the penalties that can be imposed on individuals and companies. | | - | | * Move the previous image and OST to one side of the screen and fade in two tabs – **Individuals** and **Companies** * Make these two tabs clickable. | |
| Select each tab to learn more. | | *Select each tab to learn more.* | | Fade in the i-text in sync with the VO. | |
| Sanctions include monetary penalties, imprisonment, and employment and civil law consequences (such as termination of the employment contract and damages claims). | | Sanctions include:   * Monetary penalties * Imprisonment * Employment and civil law consequences (such as termination of the employment contract and damages claims). | | Show the OST as a pop-up text with the VO when learner clicks on the **Individuals** tab. | |
| Sanctions include:   * Monetary penalties (which can be a percentage of the worldwide turnover of the group), * Civil law consequences (for example, damages claim), * Forfeiture orders siphoning off profits generated from the alleged offence, * Extensive (internal as well as external) investigations of costs and resources, * Prohibition from public tenders, * Suspension of activities, * Mandatory dissolution, and * Last but not least, damage to reputation. | | Sanctions include:   * Monetary penalties (which can be a percentage of the worldwide turnover of the group) * Civil law consequences (e.g., damages claim) * Forfeiture orders siphoning off profits generated from the alleged offence * Extensive (internal as well as external) investigations of costs and resources * Prohibition from public tenders * Suspension of activities * Mandatory dissolution * Damage to reputation. | | Show the OST as a pop-up text with the VO when learner clicks on the **Companies** tab. | |
| - | | *Select* ***Next*** *to continue.* | | * Enable the **Next** button. * Upon selecting the **Next** button, move to the next page. | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **Measures to Detect and Prevent Corruption** | | **Page Number** | | **12** |
| **Template Type** | **Carousel interactivity** | | **Duration** | | **120 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| - | | **Loi Sapin-II** | | Create Carousel panel 1 and show the title. | |
| All jurisdictions recommend more or less forcibly that companies put in place measures to prevent and detect bribery and to ensure the effectiveness of the measures considered. | | All jurisdictions recommend that companies put in place measures to:   * Prevent and detect bribery. * Ensure the effectiveness of the measures considered. | | * Reuse the organization icon from page 7. * Show OST in sync with the VO.   [Please add Plastic Omnium on top of building]  SS ID: 1377561629 | |
| Compagnie Plastic Omnium is the parent company of the Plastic Omnium group of companies. Article 17 of the Loi Sapin-II stipulates that this parent company must implement an anti-corruption system for all its subsidiaries worldwide. | | Article 17 of the Loi Sapin-II stipulates that Compagnie Plastic Omnium must implement an anti-corruption system for all its subsidiaries. | | Show the image and OST in sync with the VO.  Anti corruption concept. Hand giving money bill to another through handshake with  red prohibition sign and world map on the background[Please add Anti-corruption under this image] | |
| This system must include:   * A code of conduct, | | The anti-corruption system includes:  Code of conduct | | * Retain the previous image on one side and build the infographic on another side of the screen.     SS ID: 722513743   * Add the icon and OST in the infographic in sync with the VO.     SS ID: 1680391324 | |
| * An internal whistleblowing system intended to collect alerts raised by employees regarding situations that are contrary to the company’s code of conduct, | | Internal whistleblowing system | | Add the icon and OST in the infographic in sync with the VO.    SS ID: 1148486036 | |
| * A corruption risks mapping, | | Corruption risks mapping | | Add the icon and OST in the infographic in sync with the VO.    SS ID: 717419434 | |
| * Third-party due diligence accounting controls, | | Third-party due diligence accounting controls | | Add the icon and OST in the infographic in sync with the VO.    SS ID: 1337290151 | |
| * A training programme, and | | Training programme | | Add the icon and OST in the infographic in sync with the VO.    SS ID: 258026096 | |
| * Other disciplinary arrangements. | | Disciplinary arrangements | | Add the icon and OST in the infographic in sync with the VO.    SS ID: 556659844 | |
| - | | *Select the* ***Forward*** *button to learn more.* | | Show this user instruction and enable the forward arrow. | |
| - | | **Agence française anticorruption (AFA)** | | Create Carousel panel 2 and show the title. | |
| Compliance with the legal obligation to prevent corruption will be controlled by a new authority called the Agence française anticorruption or AFA. | | Compliance with the legal obligation to prevent corruption is controlled by a new authority called the Agence française anticorruption (AFA) | | Show the icon and OST in sync with the VO.  Loi Sapin 2 : quand la commission des sanctions s'oppose à l'Agence  Française Anticorruption (AFA) ! - ACTE International  (Icon is taken from slide 14 of the source PPT - Understanding corruption final 07 06 2021) | |
| This agency is empowered to carry out formal investigations. | | Formal investigations include: | | * Retain the icon and remove the previous OST. * Show the OST in sync with the VO. | |
| These investigations may include conducting onsite searches or interviews— | | * Conducting onsite searches or interviews | | Show the image and add OST in sync with the VO.    SS ID: 1177284385 | |
| —and requesting the disclosure of any relevant documentation in order to verify that Plastic Omnium and its subsidiaries have complied with their obligation to prevent corruption. | | * Requesting the disclosure of any relevant documentation | | Show the image and add OST in sync with the VO.  Contract inspection concept. Hand holding a contract, another hand holding magnifying glass over the contract and a table with two cup of coffee on it. Flat style  SS ID: 328485128 | |
| - | | - | | Clear the screen. | |
| Breach of the obligation to prevent corruption can be subject to— | | Breach of obligation to prevent corruption can be subject to: | | Show the image and OST in sync with the VO.    SS ID: 1227997423 | |
| —heavy administrative penalties imposed by the Sanctions Committee of the AFA. | | Heavy administrative penalties | | Show the image and OST in sync with the VO.  Uh Oh! Caught Red Handed, Corporate Suit Hands Behind Back in Handcuffs  SS ID: 731829688 | |
| In addition, should the internal procedures be deemed inadequate to prevent corrupt practices, the legal representative of the company can be fined up to €200,000 and the company itself can incur a fine of up to €1,000,000. | | The legal representative of the company can be fined up to €200,000 and the company itself can incur a fine of up to €1,000,000 | | Show the image and OST in sync with the VO.  Money bag and judge's hammer. Penalty for a crime and offense. Financial punishment. Violations of traffic laws. Fraud. Fine, penalization, mulct. Gavel. Euro[Do not show Euro sign on the bag]  SS ID: 1657770820 | |
| Note that these sanctions can be cumulative. | | Note that these sanctions can be cumulative. | | Fade in the icon and show OST in sync with the VO.    SS ID: 1902132976 | |
| - | | *Select* ***Next*** *to continue.* | | * Enable the **Next** button. * Upon selecting the **Next** button, move to the next page. | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **Whistleblowing Process** | | | **Page Number** | **13** |
| **Template Type** | **Animation** | | | **Duration** | **60 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | **Visuals and Notes to Developers** | | |
| The whistleblowing process at Plastic Omnium allows all employees to report safely and in a confidential manner any offences or acts of corruption by sending an email to  [corporatesecretary.ethicsalert@plasticomnium.com](mailto:corporatesecretary.ethicsalert@plasticomnium.com) | | Report safely and confidentially any offences or acts of corruption to by sending an email to  [corporatesecretary.ethicsalert@plasticomnium.com](mailto:corporatesecretary.ethicsalert@plasticomnium.com) | Show the image and OST in sync with the VO.  Business character receives and sending a lot of emails. E-mail marketing concept. Vector illustration. Flat design.  SS ID: 1059211895 | | |
| Plastic Omnium ensures that the confidentiality of the whistleblower’s identity is strictly maintained. | | Confidentiality of whistleblower identity is strictly observed | Retain the previous image and show OST next to him in sync with the VO. | | |
| In addition, by acting in good faith and in a disinterested way, the whistleblower cannot be dismissed, sanctioned, or discriminated against in any way for having reported facts in accordance with the whistleblowing process, even if those facts prove to be incorrect thereafter or do not result in any action being taken. | | Whistleblowers acting in good faith cannot be dismissed, sanctioned, or discriminated against for having reported such alerts | * Add the image and OST in sync with the VO. * Show a cross-sign on the image.     SS ID: 1691947729 | | |
| For further details, please refer to the Plastic Omnium group procedure relating to the whistleblowing mechanism on TOPNET. | | Refer to the Plastic Omnium group relating to the whistleblowing mechanism on TOPNET for further details. | Fade in the icon and show OST in sync with the VO.    SS ID: 1902132976 | | |
| - | | *Select* ***Next*** *to continue.* | * Enable the **Next** button. * Upon selecting the **Next** button, move to the next page. | | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **Quiz** | | **Page Number** | | **14** |
| **Template Type** | **Static** | | **Duration** | | **240 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| Before we end this module, take this quiz to test your understanding of the content we have covered.  You must answer at least three questions correctly to pass this quiz.  All the best!  Select Begin to start the quiz. | | Before we end this module, take this quiz to test your understanding of the content we have covered.  You must answer at least three questions correctly to pass this quiz.  All the best!  *Select* ***Begin*** *to start the quiz.*  Begin | | * Provide a scored quiz consisting of 4 questions. * Provide an introduction page with a **Begin** button. * Use a modern-style image background. * The correct answers are in green. * Learners will get multiple attempts until they pass. * The questions will reappear in a random order after learners retake the quiz. * Display the answer feedback immediately after the attempt. * Questions 1, 2 and 4 are single select questions. * Question 3 is a multiple select question. * Do not show yellow highlighted text as OST. | |
| - | | **Question 1**  John is responsible for exploring whether we should open a plant in a country in which Plastic Omnium has not yet set up operations. During a meeting with local government officials, he comes to understand that a substantial “financial contribution” to these officials will make it easier to get the construction and operating authorizations and permits required from the local authorities.  What should John do?  *Select the correct option and then select* ***Submit****.*   * Agree to pay this contribution in line with the country’s customs and practices. * Refuse to pay and report the incident to his manager. * Hire a local consultant to provide services to help Plastic Omnium set up operations in the country, task the consultant with making this contribution, and ask them to cross-charge the amount to Plastic Omnium as part of their professional fees. * Hire a local construction contractor who, John has been told, is used to handling the local authorities and give him a broad remit to do whatever is necessary for the company to obtain its authorizations and permits in time.   *<Feedback to be displayed if the learner selects the first option>*  **That’s not right!** Laws and customs may vary from country to country; however, Plastic Omnium in its code of conduct rejects bribery, corruption, and influence peddling in any form. For Plastic Omnium to offer money to any public function official or agent of a public organization to obtain an advantage through that person in the course of their duties constitutes an act of corruption.  *<Feedback to be displayed if the learner selects the correct option>*  **That’s right!** The code of conduct prohibits any act of bribery, corruption, or influence peddling. Such conduct is unacceptable and subject to zero tolerance even if it is to facilitate the obtaining of permits and authorizations for Plastic Omnium.  *< Feedback to be displayed if the learner selects the third option>*  **That’s not right!** The prohibition on bribery applies to both direct and indirect payments. Plastic Omnium is liable for acts of bribery committed directly by its employees or indirectly by any third party, such as agents, consultants, contractors, brokers (e.g., customs brokers), and joint venture partners.  *< Feedback to be displayed if the learner selects the last option>*  **That’s not right!** It is not a defense to claim that Plastic Omnium had no actual knowledge of a third party’s actions. If such improper payment occurs, turning a blind eye to that third party’s conduct instead of, for instance, expressing our concerns with regard to the context and making clear that the third party cannot make any such payments to the ultimate benefit of Plastic Omnium may be deemed knowledge. | |
| **Question 2**  A quality representative from one of Plastic Omnium’s largest customers is attending some qualification tests at our plant. The tests show that one of our products does not completely meet performance requirements. Since there is no safety issue at stake, John invites the customer’s representative to a lavish lunch at a well-known restaurant, and over a vintage bottle of wine agrees with the customer’s representative to embellish the results so that the product appears to meet the customer’s requirements.  Do you agree with John‘s action?  *Select the correct option and then select* ***Submit****.*   * As long as safety is not involved, John’s action is acceptable. After all, it’s a major contract and the customer’s representative agrees. * No! This qualifies as an act of bribery and corruption.   *<Feedback to be displayed if the learner selects the first option>*  **That’s not right!** Such behaviour is unacceptable. Getting the customer’s representative to accept the embellishment of the test results by inviting him to lunch constitutes an act of corruption because the goal is for the customer’s representative to feel indebted and to agree to close his eyes to our products having failed some performance tests. In addition, cheating and concealment run counter to our values and our code of conduct, which require strict quality standards, and to our commitment that all our products comply with all legal, regulatory, technical, and commercial requirements.  *<Feedback to be displayed if the learner selects the correct option>*  **That’s right!** This constitutes an act of corruption because the purpose of this lavish lunch invitation is to obtain an improper advantage in return. In addition to the employee’s employment contract being terminated and to the employee‘s potential liability under applicable law for this act of corruption, this improper behaviour would breach the trust between Plastic Omnium and its customer and damage the reputation of Plastic Omnium.  **Question 3**  A supplier recently qualified by Plastic Omnium in its panel of eligible suppliers wants to invite Jane, as head of purchasing, to a hosted seminar at a well-known beach resort to discuss the newest developments in the automotive industry. It is common knowledge that this meeting gives participants an opportunity to get to know each other and have fruitful business interactions. Between lectures, the agenda of the meeting does give some free time to participants to meet for organized sports and other entertainment. Can Jane accept this invitation?  *Select the correct option(s) and then select* ***Submit****.*   * Yes. * Yes, with conditions. * No.   *<Feedback to be displayed if the learner selects the first option>*  **That’s not right!** By accepting this invitation from a supplier keen to grow business with Plastic Omnium, Jane puts herself in a conflict of interest situation contrary to our policy because it may create some expectations on the supplier’s part of getting more business in return. The supplier must be made to understand that this invitation cannot in any way influence the future business relationship, but preferably Jane should turn it down.  *<Feedback to be displayed if the learner selects the second (correct) option>*  **That’s right!** Jane would be able to attend this seminar only if there were a serious and legitimate business interest in view of the speakers, participants, and content of the lectures, subject to (i) obtaining her supervisor’s approval and (ii) ensuring that Plastic Omnium would pay all travel, hotel, and other costs so as not to create a situation where Jane would feel indebted to the inviting supplier.  *<Feedback to be displayed if the learner selects the third (correct) option>*  **That’s right!** It would be reasonable for Jane to consider that this invitation has no obvious business purpose and to turn it down to avoid creating a conflict of interest situation where the supplier has an expectation of getting future business from Plastic Omnium.  **Question 4**  Jack from the Purchasing Department is looking for a new maintenance service provider for a three-year contract. Jack has already received bids from two suppliers when another Plastic Omnium employee, Ashley, asks him why he is putting so much effort into the search. Her cousin also does maintenance, and she can testify to his ability and seriousness. Ashley says that Jack would be doing her a big favour by hiring her cousin and sees this as a “win–win “ situation for both her cousin and Plastic Omnium. Can Jack appoint Ashley’s cousin to perform this three-year maintenance service contract?  *Select the correct option and then select* ***Submit****.*   * Yes. * No.   *<Feedback to be displayed if the learner selects the first option>*  **That’s not right!** Jack cannot do a favour for another employee that would make that employee indebted to him. It would be worse, of course, if Ashley had a managerial role over Jack because Jack might then feel he was under pressure to accept. In all circumstances, suppliers need to be selected through the Purchasing Department request for quote (RFQ) process with all possible conflicts of interest being disclosed so that the person with the conflict does not take part in the decision. If Ashley’s cousin is good, he should independently send his application to the company, and if he is selected during the RFQ process without Ashley or Jack participating in the decision, this would be OK.  *<Feedback to be displayed if the learner selects the correct option>*  **That’s right!** Jack cannot hire any supplier without following the request for quote (RFQ) and bidding process set by the Purchasing Department – especially if his rationale is to please Ashley. This would create a conflict of interest situation between the best interests of Plastic Omnium and the personal interests of both Ashley and Jack. As a result, Ashley could feel indebted to Jack, which might affect their working relationship and Ashley’s behaviour towards Jack. Jack in return could request another favour from Ashley that potentially could be detrimental to the interests of Plastic Omnium. | |

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| **Module Title** | **Understanding Corruption** | | | | |
| **Page Title** | **Result** | | **Page Number** | | **15** |
| **Template Type** | **Static** | | **Duration** | | **30 seconds** |
| **Screen Visuals:** NA | | | | | |
| **VO** | | **On Screen Text (OST)** | | **Visuals and Notes to Developers** | |
| Congratulations! You have successfully completed this module.  Your personal commitment to comply with the company’s policy is crucial to preserve Plastic Omnium assets, reputation, and continued success. | | Congratulations!    You answered [ ] out of [ ] questions correctly.  You have successfully completed the quiz. Your personal commitment to comply with the company’s policy is crucial to preserve Plastic Omnium assets, reputation, and continued success.  *Select* ***Certificate*** *to download the certificate.*  **<Certificate>** | | Show the OST when the learner achieves a passing score or more. | |
| Sorry, you must answer at least three questions correctly to complete this module.  Select retake Quiz or Retake Module to continue. | | Sorry!  You answered [ ] out of [ ] questions correctly.  You must answer at least three questions correctly to complete this module.  *Select* ***Retake Quiz*** *to attempt the quiz again.*  **<Retake Quiz>**  *Select* ***Revisit Module*** *to view the module again.*  **<Revisit Module>** | | Show the OST when the learner fails to achieve the passing score. | |