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ETHIC Intelligence

Decision to Award and Register ISO 37001

Awarded to

SOFRECOM

Philippe MONTIGNY

President

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CERTIFYING EXCELLENCE IN ANTI-CORRUPTION COMPLIANCE

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ETHIC Intelligence, certification body, according to the ISO 17021 – 9 standard “requirements for certification bodies” has asked:

The ISO 37001 Technical Committee,

To complete the examination of the findings presented by the Lead Auditor, Hilaire Noubissi, PhD, found during the ISO 37001 audit presented by Andrea Baglietto, Chief Compliance Officer of SOFRECOM.

ETHIC Intelligence,

- **Taking into account** the contract signed by SOFRECOM CEO, Guillaume Boudin, stating his intent to submit SOFRECOM’s Anti-Bribery Management System to an ISO 37001 certification audit (Annex 1);
- **having taken note** of the audit report and findings presented by the Lead Auditor
- **noting** that there are no non-conformities within the Anti-Bribery Management System of SOFRECOM;
- **having concluded**, after the ISO 37001 Technical Committee review that the Anti-Bribery Management System is in compliance with the ISO 37001:2016 standard;
- **Supports** the overall evaluation reached by the Lead Auditor, namely that ETHIC Intelligence agrees on the ISO 37001:2016 certification of SOFRECOM;

AWARDS, on this day and for a duration of three years (3), **ISO 37001 Certification** () in virtue of having implemented an Anti-Bribery Management System which conforms to the standard.

Paris, 29 June 2018

President of ETHIC Intelligence

A handwritten signature in black ink, appearing to read "Ph. Montigny".

Philippe Montigny

ANNEX 1: AUDIT INFORMATION

The on-site audit began on April 4, 2018 in Rabat, Morocco and continued in Vincennes, France and Buenos Aires, Argentina. The audit was concluded on April 20, 2018.

The audit was based on documented information review as well as interviews with executives. Documents analyzed were either made available spontaneously by the interviewees or were requested by the Lead Auditor.

AUDIT OBJECTIVE

The audit objective was to determine if SOFRECOM has implemented an Anti-Bribery Management System that could prevent, detect and mitigate the risk of bribery.

AUDIT CRITERIA

The audit criteria were:

- The requirements of ISO 37001 standard
- Applicable laws
- SOFRECOM's policies and procedures relative to the ISO 37001 Management System

AUDIT SCOPE

The audit scope covers SOFRECOM's global anti-bribery management system.