

TRACE | certification Due Diligence Report



WHAT DOES IT MEAN TO BE TRACE CERTIFIED?

It means that you or your company have completed a comprehensive due diligence process administered by TRACE, the world's leading anti-bribery standard setting organization. Certification by TRACE signifies that you have completed internationally accepted due diligence procedures and have been forthcoming and cooperative during the review process. The successful completion of TRACE certification demonstrates your commitment to commercial transparency, allowing you to serve as a valued business partner to multinational companies.

What is included in a TRACEcertification report?

- Detailed company information, including information on subsidiaries and affiliated entities
- Business registrations, as applicable
- Corporate literature or a company description
- Beneficial ownership (except for shareholders owning less than 5% of publicly-traded companies)
- Identification of directors and key employees
- Curriculum vitae for owners, directors and key employees
- Additional ownerships, directorships and employment of all owners, directors and key employees
- Current government employment of owners, directors and key employee's
- Previous government employment of owners, directors and key employees
- Three business references
- One financial reference or audited financial statement

What are the advantages/benefits of becoming TRACE Certified?

- Gain a valuable business credential that is widely recognized in the compliance community
- Receive a copy of your report to share with those you wish
- Access TRACE's online anti-bribery compliance training as well as TRACE's "Avoiding Trafficked Labor" training module
- Include your name, or company's name, on lists of TRACE Certified Agents provided to multinational TRACE Members seeking business partners in your region
- Use the TRACE logo in your marketing materials and on your website to showcase your commitment to transparency and supply chain integrity
- Attend TRACE Workshops, hosted regularly around the world for compliance professionals at no cost

TRACEcertification is not a quarantee against past or potential wrongdoing by the certified entity or a guarantee against potential liability. A summary of any "red flags" identified during the TRACEcertification review will be included in the report, but not all red flags preclude TRACE certification.

About TRACE

TRACE International is a non-profit business organization that pools resources to provide members with anti-bribery compliance support. TRACE members include hundreds of multinational corporations, as well as thousands of small and medium-sized enterprises throughout the world. TRACE International is the world's leading anti-bribery standard setting organization and works with TRACE Incorporated to offer both members and non-members customizable due diligence, training and advisory services. With a shared mission to advance commercial transparency, TRACE International and TRACE Incorporated provide companies with one complete anti-bribery and third party compliance solution.

For more information, visit www.TRACEinternational.org.

Follow TRACE: You Tube in F









The internationally recognized organization working with companies to raise anti-bribery compliance standards worldwide.

www.TRACEinternational.org

This certifies that

has completed a comprehensive background review and is TRACE Certified

TRACEcertification ID:

Alexandra Wrage, TRACE President





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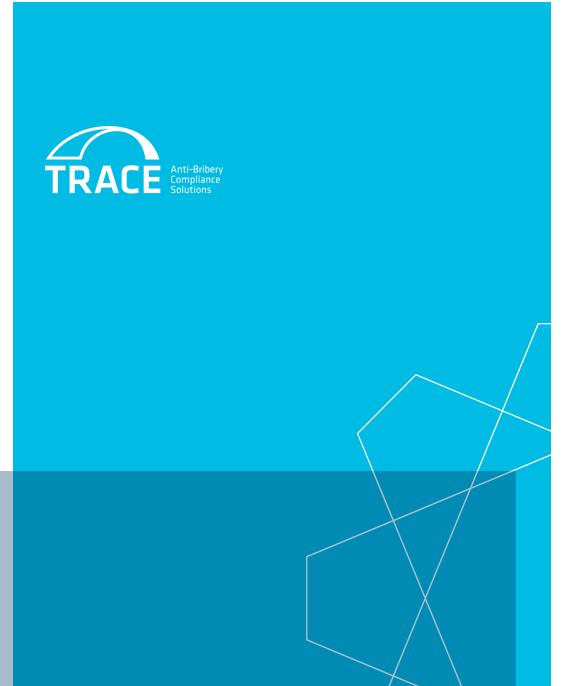
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TRACE Due Diligence Summary

Intermediary Name:			
Certification Date:			
Issues arising in the course of the due diligence review:			
	None		
	Previous bankruptcy, negative reference, or qualified auditor's statement		
	Unusual corporate structure		
	Apparent lack of qualifications for industry indicated		
	Requests payment outside the territory		
	Ownership by government official/entity		
	Key person is a government official		
	Family member of key personnel is a government official		
	Answered "yes" to enforcement questions		
	Disclosed intention to work with an unvetted third party intermediary		
	Negative Reputational Screening coverage		
	Other		



The **TRACE** due diligence review of commercial agents is thorough. The review may nevertheless fail to uncover information which, if available, would have discouraged or prevented companies from entering into a business relationship with the agent. Companies requesting **TRACE** Reports agree that in no event shall **TRACE** be liable for any damages incurred as a result of relying on **TRACE** Reports or as a result of any omission or misrepresentation by an agent reviewed by **TRACE**.



SECTION A: Business information:

Specify Intermediary Type: Limited Liability Company

COMPANY'S FULL LEGAL NAME: BOURDIER & Cie

Doing Business As Name or Trade/Marketing Name Bourdier & Co. / Bourdier et Cie

(if applicable):

STREET ADDRESS: 38. rue de Berri

CITY: **Paris**

STATE/PROVINCE: Ile-de-France

POSTAL CODE: 75008 **Specify Country:** France

+33 1 45 62 78 78 OR +33 6 08 71 70 56 **TELEPHONE:**

FACSIMILE: +33 1 45 62 88 00

WEBSITE ADDRESS

(if you do not have a website, please indicate

"none" in this field):

www.bourdierparis.com

FULL LEGAL NAME FOR CONTACT PERSON: Bernard Harry Bourdier

E-MAIL ADDRESS OF CONTACT: bourdierparis@wanadoo.fr

Specify Industry: Consulting **Specify Type of Services:** Consultant

In which country/countries do you provide

products/services?:

Canada, Finland, France, Spain, Thailand,

USA, Vietnam

Check; Wire Transfer

In what country/countries do you ask to be paid, and where do you make payments from (i.e. In which country/countries is the bank or financial institution that will host these financial transactions located)?:

France

Please indicate the method(s) by which you prefer to receive payments (check all that apply):

- Check
- Wire Transfer
- Other:

Please provide a three (3) to five (5) sentence description of the types of products/services that you provide:

Market Survey, Marketing, Legal and Commercial Assistance, Negotiation



If "Other" was provided as a response to any of the questions above, please clarify the meaning of "other" here:

SECTION B: Business Registration Information:

1.) What is the date that your business was established?:

06/30/1992

- 2.) If the date that your company was established differs from the dates on any registration documents, please clarify here:
- 3.) Please provide a business tax identification number (for sole proprietors, please provide an individual tax identification number):

FR 713 880 779 43 00016

4.) Do you have any mandatory business registrations, licenses and/or certifications?:

Yes

If Yes, please list the name of the registration, the registration date, the expiration date, & the office, city and country where registered:

Extrait Kbis

Registration Number: 388 077 943 R.C.S.

Paris

Date of Registration: June 30, 1992 Expiration Date: June 30, 2091

Greffe du Tribunal de Commerce de Paris

5.) Are you required by law to be registered with any other Government Agencies based on the type of services that you provide, or the industry that you primarily work in (i.e. if you engage in the promotion or distribution of military equipment, are there special registration requirements in your home territory or the territory in which you conduct the activity)?:

No

If Yes, please list the name of the registration, the registration date, the expiration date, & the office, city and country where registered:

6.) Are you registered with any other organizations No or associations?:

If Yes, please list the name of the registration, the registration date, the expiration date, & the office, city and country where registered:



7.) Please add any additional or clarifying information here regarding your Business Registrations:

SECTION C: Associated Offices and Entities Information:

1.) Do you have any Subsidiary Organizations?:

If Yes, please provide the name and address of the Subsidiary/Subsidiaries, and the FULL LEGAL NAMES of all owners and percentages of all ownership interests.:

Bourdier & Cie -- Vietnam Representative

Address: Atlanta Residence Suite 1201, Hang Chuoi, Hanoi, Vietnam

Ownership: Bourdier & Cie owns 100% of

this office.

Yes

Bourdier & Cie -- Beijing Representative Office

Address: Room 2425E, 24th Floor, Building B, Vantone New World Plaza, Room 1622A, 16th Floor East Tower, Sichuan Plaza N° 1, Fuchengmen Wai Street, Xicheng District,

Beijing, 100037 P.R. CHINA

Ownership: Bourdier & Cie owns 100% of

this office.

2.) Do you have any Joint Ventures?:

No

If Yes, please provide the name and address of the Joint Venture(s), and the FULL LEGAL NAMES of all owners and percentages of all ownership interests:

3.) Do you have any Branch Offices?:

No

If Yes, please provide the FULL LEGAL NAMES and address of the Branch Office(s):

4.) Are you part of a Group of companies or affiliated companies?:

No

If Yes, please provide the FULL LEGAL NAME and address of the Group, your relationship with the group, and whether the Group is a legal entity or marketing name:

5.) Will any of the individuals or entities listed above be involved in transactions for, or provide services to, your clients / vendors / suppliers?:

No



If Yes, please provide their FULL LEGAL NAMES and describe their involvement:

6.) EXTERNAL PERSONNEL: Will your company No engage any third parties, intermediaries, or other persons or entities NOT previously mentioned to be involved in transactions for, or provide services to, your clients/vendors/suppliers?:

If Yes, please provide their FULL LEGAL NAMES and describe their involvement:

Mr. Bourdier confirmed that he himself provides services in the countries outside of France. He works out of the Representative Offices, and those offices do not have any other employees.

SECTION D: Ownership Information:

1.) Is your company publicly traded? [If you answered "No", please provide ownership information in response to Question #2 below]:

If Yes, on which stock exchange is your company traded?:

PUBLICLY TRADED Ownership information:

If your company is traded on a stock exchange as indicated above, please list the FULL LEGAL NAMES, job titles, citizenships and ownership interest of all shareholders who have more than a 5% ownership interest in your company.

If any of the owners are entities, please email the ownership structure of that entity to info@TRACEselect.com or describe in full detail below. One hundred percent of ownership should be attributed to individuals. Please provide a clear picture of each tier of your company's full ownership structure:

No



2.) PRIVATELY OWNED Ownership information:

If your company is privately owned please list the FULL LEGAL NAMES, job titles, citizenships and ownership percentage of all individuals who have an ownership interest in your company.

If any of the owners are entities, please email the ownership structure of that entity to admin@TRACEselect.com or describe it in full detail below. One hundred percent of ownership should be attributed to individuals. Please provide a Shareholder clear picture of all of the tiers of your company's full ownership structure:

Bernard Harry Bourdier Managing Director

French

Ownership Percentage: 38%

Loic Alain Raymond Marie Dayot

Data Processor

French

Ownership Percentage: 30%

Catherine Armande Dominique Lazardeux

Ownership Percentage: 32%

SECTION E: Board of Directors Information:

1.) Does your business have a Board of Directors?: No

If Yes, please provide the FULL LEGAL NAMES of the members of the board, their titles and citizenships:

SECTION F: Personnel Information:

1.) What is your total number of personnel (including owners, managers and directors)?:

2.) Does your company have personnel (including owners and members of the board listed above)who are authorized to make binding decisions for your company and/or enter into contracts with clients?:

If Yes, please provide the FULL LEGAL NAMES of the employee(s), title and citizenship:

Yes

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Bernard Harry Bourdier **Managing Director**

French

Nathalie Léa Vautier **Project Manager**

French

3.) Does your company have personnel (including owners and members of the board listed above) who market or sell any products/services to customers?:

Yes



If Yes, please provide the FULL LEGAL NAMES of the employee(s), title, and citizenship:

Bernard Harry Bourdier Managing Director French

4.) Does your company have personnel (including owners and members of the board listed above) who may interact with a government official?

No

GOVERNMENT DEFINITION: Any government agency or office, political party organization, state-owned enterprise, public international organization, agency of a public international organization or schools, universities or hospitals that are state-owned or state subsidized:

If Yes, please provide: The FULL LEGAL NAMES of the employee(s), their title, and citizenship.:

5.) EXTERNAL PERSONNEL: Does any person, entity, government or government agency (not listed above) have any management right or financial interest in your business?

No

GOVERNMENT DEFINITION: Any government agency or office, political party organization, state-owned enterprise, public international organization, agency of a public international organization or schools, universities or hospitals that are state-owned or state-subsidized:

If Yes, please provide:

The FULL LEGAL NAMES of the individuals or entities

Citizenship or country of that individual or entity Describe the management right or financial interest:

SECTION G: Conflicts Information:



1.) Will your company market to a government or government agency, including the military?

No

GOVERNMENT DEFINITION: Any government agency or office, political party organization, state-owned enterprise, public international organization, agency of a public international organization or schools, universities or hospitals that are state-owned or state-subsidized:

If Yes, identify the government agency:

2A.) Does your company have any service or other No contracts directly with a government or a government-controlled entity?

GOVERNMENT DEFINITION: Any government agency or office, political party organization, state-owned enterprise, public international organization, agency of a public international organization or schools, universities or hospitals that are state-owned or state-subsidized:

If Yes, please provide

- the type of services/products to be performed,
- the government agency for whom you are providing the services/products and
- whether or not a conflict exists:

The intermediary confirmed that Bourdier & Cie never interacts with or represents any government entities or officials.

2B.) Does any individual listed in this questionnaire No have any service or other contracts directly with a government or a government-controlled entity?

GOVERNMENT DEFINITION: Any government agency or office, political party organization, state-owned enterprise, public international organization, agency of a public international organization or schools, universities or hospitals that are state-owned or state-subsidized:

If Yes, please provide

- the FULL LEGAL NAME of the individual who holds the contract.
- type of services/products to be performed,
- the government agency for whom the individual is providing the services/products and
- whether or not a conflict exists

•



3.) Does any person listed in this questionnaire No maintain additional directorships, ownership interests or employment outside of your business?:

If Yes, please provide

- the FULL LEGAL NAME of the individual,
- the type of external interest/employment,
- the name of the external entity, and
- a description of the responsibilities/duties of that interest

4.) Has any person listed in this questionnaire ever Yes held or worked in a government position (non-military)?

GOVERNMENT DEFINITION: Any government agency or office, political party organization, state-owned enterprise, public international organization, agency of a public international organization or schools, universities or hospitals that are state-owned or state-subsidized:



If Yes, please provide

- the FULL LEGAL NAME of the individual
- the position
- start & end dates
- whether they had or have procurement authority
- name of the government office
- the country in which they served
- whether that country imposed any laws, rules, regulations or restrictions after government/military service:

Bernard Harry Bourdier

Office: Caisse des dépôts et Consignation

France

Position: Attaché d'administration June 1976 to October 1978

No procurement authority.

No laws, rules, regulations or restrictions

were imposed.

Bernard Harry Bourdier Foreign Trade Counselor (appointed by the

French Prime Minister)

Comité National des Conseillers du

Commerce Extérieur

France

2008 - 2011

No procurement authority.

No laws, rules, regulations or restrictions

were imposed.

The intermediary confirmed that he never used this position to influence the business

of Bourdier & Cie.

Loic Alain Raymond Marie Dayot Chief Information Officer Villejuif City Council France

24th February 2014 - Current No procurement authority.

Mr. Dayot never uses this position to influence the business of Bourdier & Cie. The Villejuif City Council is not aware of Mr.

Dayot's involvement with Bourdier & Cie.

5.) Has any person listed in this questionnaire ever been in the military, including compulsory military service?:

Yes



If Yes, please provide

- the FULL LEGAL NAME of the individual

- his/her rank

- start & end dates

- whether he/she had or has procurement authority

- name of the military branch

- the country of service

- whether that country imposed any laws, rules, regulations or restrictions after military service

- whether this military service compulsory

:

6.) Does any individual listed in this questionnaire currently hold any position with or have any duties for any political party or political campaign?:

No

No

If Yes, please provide

- the FULL LEGAL NAME of the individual(s),

- the position(s),

- the duty/duties of that position(s) and

- whether or not a conflict exists

:

7.) Is any individual listed in this questionnaire a candidate for any political office?:

If Yes, please provide

- the FULL LEGAL NAME of the individual(s),

- the name of the political office,

- the duties of that office, and

- whether or not a conflict exists

:

were imposed after the end of the 1 year period.

France

Bernard Harry Bourdier French Air Army

1967 (1 year duration)

Compulsory Military Service

No laws, rules, regulations or restrictions

Rank: 2nd Class



- **8.) Are any family members of any individual listed** None of the Above in this questionnaire (check all that apply):
- Employed or otherwise engaged in any capacity by any government entity, including the military
- Employed by or have duties for any political party or political campaign
- Candidates for political office

GOVERNMENT DEFINITION: Any government agency or office, political party organization, state-owned enterprise, public international organization, agency of a public international organization or schools, universities or hospitals that are state-owned or state-subsidized.

:

If Yes, please provide the following information for ALL family members to which the question above applies:

- FULL LEGAL NAME of the individual listed in this questionnaire who has a relative associated with the government or a political party
- FULL LEGAL NAME of the relative
- Relationship
- Relative's Position
- Whether the Relative has Procurement Authority
- an explanation of what that Procurement Authority entails (if applicable)

:

below:

SECTION H: Compliance Information:

1.) Does your company currently have a written policy addressing bribery?:	Yes
2.) Does your company distribute its ethics and compliance (including anti-bribery) policies to its employees? :	Yes
3.) Does your company have a system that allows its employees to ask questions or report concerns regarding ethical and compliance (including antibribery) matters?:	Yes
If Yes, please provide details in the space provided	Report to Managing Director



4.) Does your company require its subsidiaries, Yes affiliates, subcontractors and other third parties to comply with your company's ethics and compliance (including anti-bribery) policies?:

If No, please provide an explanation in the space provided below:

5.) Does the candidate conduct periodic assessments of ethical and compliance (including anti-bribery) risks? :

Yes

No

If yes, please indicate in the space provided below when the last assessment was completed:

December 2013 by ETHIC INTELLIGENCE (see on web site)

6.) Has the candidate been a party to any mergers or acquisitions over the past 5 years? :

If yes, please provide details in the space provided below, including dates and the names of the entities involved:

- 7.) Does your company have a human rights policy or a formal commitment to respect human rights? (This can include policies against forced labor, child labor, bonded labor, debt bondage, forced prison labor, slavery, servitude, or human trafficking.):
- 8.) If Yes to question H7, Does your company require its subsidiaries, affiliates, joint-venture partners, suppliers, subcontractors and third parties to comply with the company's human rights policy?:

N/A

SECTION I: Enforcement Information:

1.) Has your company (or any person or entity listed No in this questionnaire) ever been convicted of violating any rules or regulations governing the purchase or sale of goods or services to or by any government?:

If Yes, please provide details in the space provided below:



2) Has your company (or any person or entity listed No in this questionnaire) ever been interviewed, deposed or subpoenaed in connection with any litigation or investigation involving any government regulations?:

If Yes, please provide details in the space provided below:

3.) Has your company (or any person or entity listed No in this questionnaire) ever been found guilty of violating any law governing donations, contributions, honoraria or any other form of remuneration to any government official?:

If Yes, please provide details in the space provided below:

4.) Has your company (or any person or entity listed No in this questionnaire) ever been interviewed, deposed or subpoenaed in connection with any litigation or investigation involving any law governing donations, contributions, honoraria or any other form of remuneration to any government official?:

If Yes, please provide details in the space provided below:

5.) Has your company (or any person or entity listed No in this questionnaire) ever been interviewed, subpoenaed or asked to testify before any legislative body concerning fraud or abuse with regard to any governmental procurements?:

If Yes, please provide details in the space provided below:

6.) Has your company (or any person or entity listed No in this questionnaire) ever been found guilty of any violations of securities or commodities trading laws?:

If Yes, please provide details in the space provided below.:



7.) Has your company (or any person or entity listed No in this questionnaire) ever been interviewed, deposed or subpoenaed in connection with any litigation or investigation involving any violations of securities or commodities trading laws?:

If Yes, please provide details in the space provided below:

8.) Has your company (or any person or entity listed No in this questionnaire) ever been found guilty of any violation of any laws governing the regulation of antitrust practices?:

If Yes, please provide details in the space provided below:

9.) Has your company (or any person or entity listed No in this questionnaire) ever been the subject of or mentioned by name in any newspaper or magazine article in an adverse manner?:

If Yes, please provide details in the space provided below:

10.) Has your company (or any person or entity No listed in this questionnaire) ever been charged, interviewed or found guilty concerning income tax evasion?:

If Yes, please provide details in the space provided below:

11.) Has your company (or any person or entity listed in this questionnaire) ever been convicted of a felony or other criminal act for any matter not listed above?:

If Yes, please provide details in the space provided below:

12.) Excluding traffic charges, has any person listed No in this questionnaire ever been arrested, charged, cited or held by law enforcement authorities regardless of whether the charge was dropped, dismissed or a verdict of not guilty was entered?:

If Yes, please provide details in the space provided below:



13.) Has your company (or any corporation, No partnership, or other entity in which your company owns more than a 5% interest) ever been debarred from competing for World Bank contracts?:

If Yes, please provide details in the space provided below:

14.) Has your company (or any person or entity listed in this questionnaire) ever been debarred from competing for government contracts in any country?:

If Yes, please provide details in the space provided below:

15.) Has your company (or any person or entity No listed in this questionnaire) ever had a security clearance denied or revoked?:

If Yes, please provide details in the space provided below:

16.) Has any person listed in this questionnaire ever No been discharged from any Armed Forces with other than an honorable discharge?:

If Yes, please provide details in the space provided below:

17.) Has your company (or any corporation, No partnership or other entity in which the Candidate has more than a 5% interest) or has an owner, partner, officer, director or key employee been the subject of any voluntary or involuntary bankruptcy or other similar proceeding?:

If Yes, please provide details in the space provided below:



- 18.) Is your company (or any person or entity listed None of the Above in this questionnaire) named on any of the following lists (check all that apply):
- The Specially Designated Nationals List
- The Specially Designated Global Terrorists List
- The Specially Designated Narcotics Traffickers
 List
- The Specially Designated Narcotics Traffickers/Kingpins List
- The U.S. Department of Treasury Office of Foreign Assets Control List of Foreign Terrorist Organization
- The U.S. Department of Commerce Denied Parties List
- The U.S. Department of State ODTC Debarred List:

If Yes, please provide the FULL LEGAL NAME of the individual(s) or entity(s) and the name of the list on which they named:

19.) Has your company (or any business concern controlled by your company or, to your knowledge, any of your owners, employees, officers or directors) ever admitted guilt for, been convicted of or currently under investigation for Trade Control violations (such as violations of export controls, sanctions, and anti-boycott laws or regulations)?:

If Yes, please provide details in the space provided below.:

20.) Has your company (or any business concern controlled by your company, or, to your knowledge, any of your owners, employees, officers or directors) ever been placed on any restricted parties' lists? (For example: United Nations Consolidated List, European Commission Terrorism List, U.S. Department of Commerce Denied Persons List, Unverified List or Entity List; U.S. Treasury Department's Specially Designated Nationals List, etc.):

If Yes, please provide details in the space provided below.:



21.) Does your company (or any business concern No controlled by your company or, to your knowledge, any of your owners, employees, officers or directors) have any offices or other operations in Myanmar, Cuba, Iran, North Korea, the Republic of Sudan or Syria?:

If Yes, please provide details in the space provided below.:

22.) Has your company (including any business concern controlled by your company or, to your knowledge, any of your officers, directors, employees, or owners), ever donated, sold, exported, re-exported or otherwise transferred, purchased or imported, directly or indirectly through third countries or parties, equipment, products, funds or services to or from Myanmar, Cuba, Iran, North Korea, the Republic of Sudan or Syria or otherwise serviced (or requested services in relation to) products located in these countries without the requisite license in place?:

If Yes, please provide details in the space provided below.:

SECTION J: Additional Information:

No



Please provide any additional information that will be useful and relevant for your file. You may also use this section to clarify your responses to any of the questions in the preceding sections.:

The website indicates that Bourdier & Cie provides services in countries not listed above. The intermediary confirmed they do not provide goods or services in China, Cambodia, Laos, or Myanmar.

Invalid Registrations:

The website mentions that Bourdier et Cie is a member of the Organisation of International Trade Specialized Operators (OITSO). The intermediary confirmed that he resigned from this organization two years ago.

The website mentions that Bourdier et Cie is a member of CGI. The intermediary confirmed that Bourdier et Cie is not and has never been a member of CGI.

Certification:

Electronic Certification:

True

I certify the following information:

- The information provided is, to the best of my knowledge and belief, accurate, current and complete.
- I am authorized to certify that the foregoing is true and correct.

(Click the box if you agree):

On the following date, I have certified all of the foregoing information::

12/12/2014

Name of the person who has completed and certified to the foregoing information contained in this questionnaire::

Bernard Harry Bourdier



By signing below, I agree that I have reviewed the questionnaire provided to me by TRACE. Further, I declare that the information provided throughout the questionnaire is, to the best of my knowledge and belief, accurate, current and complete. I declare that I have the authority to certify to the contents of the questionnaire.

Bernard BOURDIER	Managing Director
Printed/Typed Name	Title
B	12th December 2014
Signature	Date



Name confirmation document for Bourdier & Cie

Please provide all responses using the Roman or Latin alphabet.

Name provided to TRACE on the application	Full Legal Name (as it appears on passport or government identification)		sport or	Commonly Used Name(s) in business	<u>Variations/Spellings</u> <u>of the Legal Name</u> (if applies)
	Given/First Name	Middle Name(s)	Family/ Last Name(s)		
Example: Andrew Sloan	Andrew	Joseph	Sloan	Andrew Sloan, Andrew J. Sloan	NA
Example: Maria Smith	Maria	Anna	Smith	Anna Smith	NA
Example: Jose Lopez Garcia	Jose	Ricardo	Lopez Garcia	Jose Lopez, Jose Lopez-Garcia	NA
Example: Mohammed Karim Hassani	Mohammed	Karim Mustafa	Al-Hassani	Karim Al-Hassani	Muhammed Karim Al-Hassani
Example: Michael Xiaoming Wang	Xiao Ming		Wang	Michael Wang	Wang Xiaoming
Bernard Harry Bourdier	Bernard	Harry	BOURDIER	Bernard BOURDIER	NA
Loic Dayot	Loic	Alain Raymond Marie	DAYOT	Loic DAYOT	NA
Catherine Lazardeux	Catherine	Armande Dominique	LAZARDEUX	Catherine LAZARDEUX	NA
Nathalie Vautier	Nathalie	Léa	VAUTIER	Nathalie VAUTIER	NA





10/29/2014 Bourdier & Cie

BOURDIER & CIE

CONSEIL ET ASSISTANCE A L'INTERNATIONAL

ACCUEIL

A PROPOS

NOTRE EQUIPE

NOS SERVICES

PRESSE

CONTACT

ETHIOUE

QUI SOMMES NOUS

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Bourdier & Cie est une société à responsabilité limitée créée en juin 1992. Bernard BOURDIER est son fondateur et son Directeur Général depuis cette date.

Bourdier & Cie est une société de conseil et d'accompagnement à l'international notamment en Asie du Sud-est (Chine du sud, Vietnam, Cambodge, Laos, Thaïlande, Myanmar).

Bourdier & Cie travaille principalement dans les domaines de l'aviation civile, de la sécurité, des transports, des communications et de l'énergie pour le compte de grandes entreprises appartenant aux plus grands groupes industriels mondiaux. Bourdier & Cie a son principal établissement à Paris et des bureaux de représentation à Beijing et à Hanoi.

En tant que société de services d'accompagnement à l'international (SAI) Bourdier & Cie est membre du L'Organisation des Opérateurs Spécialisés du Commerce International (OSCI) qui est la composante essentielle du Pôle Privé d'aide à l'export et qui est rattachée à la CGI.

De 2008 à 2011, Bernard BOURDIER a été nommé Conseiller du Commerce Extérieur de la France par décret du Premier Ministre.

Gamme de services :

Prospection - Identification de marchés - Intelligence économique - Information sur la concurrence et prix du marché - Recherche de partenaires locaux - Etude de faisabilité - Définition de stratégie commerciale - Montage de projets - Ingénierie financière, recherche de financements

Assistance Commerciale:

Préparation de mission, prise de rendez-vous - Suivi de projets - Préparation d'appels d'offres - Assistance à la négociation - Négociation de contrats - Suivi d'exécution de contrats, suivi des paiements

Moyens:

Expertise juridique, économique et commerciale - Expérience du commerce international - Capacité à formaliser des offres, rédiger et négocier des contrats - Expérience du terrain depuis plus de 25 ans - Connaissance de la culture des pays concernés et de leur histoire - Connaissance des mentalités - Connaissance des procédures et réglementations - Maintien des réseaux de relations

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MAIN ABOUT US TEAM SERVICES PRESS CONTACTS ETHICS

ABOUT BOURDIER AND CO.



Bourdier & Co. is a limited company established in June 1992. Bernard BOURDIER is its founder and its General Director since that date.

Bourdier & Co. is a consulting company at international scale, especially in South-East Asia (South China, Vietnam, Cambodia, Laos, Thailand, Myanmar), which gives support to the project during the whole process of project implementation.

Bourdier & Co. operates chiefly in such fields as civil aviation, security, transport, communications and energy, to the benefit of big enterprises belonging to the world most important industrial groups.

With headquarters based in Paris, Bourdier & Co. has its representative offices at Beijing and Hanoi.

As a support service company at international scale, Bourdier & Co. is member of Organisation of International Trade Specialized Operators (OITSO), an essential component of Private Sector for help to export and a member of CGI.

From 2008 to 2011, Bernard BOURDIER has been appointed by French Government Prime Minister as Foreign Trade Counselor of France.

Copyright Bourdier & Cie 2013







Registrations

Extrait Kbis

EXTRAIT D'IMMATRICULATION AU REGISTRE DU COMMERCE ET DES SOCIETES

au 20 Février 2014

IDENTIFICATION

Dénomination sociale BOURDIER ET CIE 388 077 943 R.C.S. Paris Numéro d'immatriculation

30/06/1992 Date d'immatriculation

RENSEIGNEMENTS RELATIFS A LA PERSONNE MORALE

38 rue de Berri 75008 Paris Adresse du siège Forme juridique Société à responsabilité limitée

7 622.45 EUROS Capital Date de clôture de l'exercice social 31 décembre Durée de la personne morale Jusqu'au 30/06/2091

Constitution Au greffe du Tribunal de Commerce de Paris

N° 009263 du 23/06/1992 Dépôt d'actes constitutifs

Journal d'annonces légales Les Annonces de la Seine du 22/06/1992

GESTION, DIRECTION, ADMINISTRATION, CONTRÔLE

Gérant

Nom / Prénoms **BOURDIER Bernard**

Date et lieu de naissance Le 30/01/1948 à Villeneuve-Saint-Georges 94190

Nationalité Française

Demeurant 29 Quartier Chey Chumneas Daunpenh Phnom Penh (CAMBODGE)

RENSEIGNEMENTS RELATIFS A L'ETABLISSEMENT PRINCIPAL ET A L'ACTIVITE

Adresse de l'établissement principal 38 rue de Berri 75008 Paris

Activités exercées dans l'établissement

LE CONSEIL ET LES ETUDES EN DEVELOPPEMENT INTERNATIONAL, LA REPRESENTATION DE SOCIETES ETRANGERES, L'INVESTISSEMENT DANS DES SOCIETES

INDUSTRIELLES NOTAMMENT EN ASIE

Date de début d'activité 19/06/1992 Origine du fonds ou de l'activité Création

Mode d'exploitation Exploitation directe

AUTRE MENTION OU OBSERVATION

- Mention n° 52576 du 01/01/2002

CONVERSION DU CAPITAL SOCIAL EN EUROS EFFECTUEE D'OFFICE PAR LE GREFFIER DU TRIBUNAL DE COMMERCE EN APPLICATION DU DECRET N°2001-474 DU 30 MAI 2001

Le Greffier



FIN DE L'EXTRAIT

Paris Business Court Clerk Office

1, Quai de la Corse 75181 PARIS CEDEX 04

Management No 1992B08099

KBIS Extract

Extract of main registration from Business and Companies Register Updated on October 21, 2014

ORGANIZATION IDENTIFICATION

BCR registration number: 388 077 943 R.C.S. PARIS

Registration date: June 30, 1992

Company name: BOURDIER AND COMPANY

Legal form: Limited company Registered capital: € 7,622.45

Note Nº 52576 on January 01, 2002: CONVERSION OF REGISTERED CAPITAL INTO EUROS

OFFICIALLY IMPLEMENTED BY BUSINESS COURT CLERK, IN APPLICATION OF DECREE NO 2001-474 DATED

MAY 30, 2001

Head office: 38 Berri Street, 75008 Paris

Operation term: Up to June 30, 2091 Company financial year closing date: 31st of December

MANAGEMENT, ADMINISTRATION, CONTROL, ASSOCIATES OR MEMBERS

Director:

Full name: BOURDIER Bernard

Date and place of birth: January 30, 1948 at Villeneuve-Saint-Georges (94)

Nationality: French

Registered permanent residence: 29 Chey Chumneas Daunpenh Quarter, Phnompenh

(CAMBODIA)

INFORMATION ON COMPANY OPERATION AND MAIN INSTITUTION

Main institution address: 38 Berri Street, 75008 Paris

Operation: CONSULTANCY AND STUDIES IN INTERNATIONAL

DEVELOPMENT, REPRESENTATION OF FOREIGN COMPANIES, INVESTMENT IN INDUSTRIAL COMPANIES,

ESPECIALLY IN ASIA

Operation start: June 19, 1992
Origin of business or operation Creation

Operation mode Direct operation

Court Clerk (sealed)

END OF EXTRACT



Resumes/CVs

Employment History and Affiliations

Employment History a	Tid / tilliations
Name: Bernard Bourdier	
Title: Managing Director	
Email: bourdierparis@wanadoo.fr	
2. Basic Information:	
1.) What is your full legal name?:	Bernard Harry Bourdier
2.) What is your citizenship(s)::	French
3. Current Employment Information:	
1.) What is the name of the company that has asked you to complete this form?:	Bourdier & Cie
2.) Please select the type of position(s) you hold at this company::	Owner
3.) What is your title?:	Managing Director
4.) What was your start date?:	06/30/1992
5.) What was your end date? (Indicate "none" if you are still employed with the company):	None
6.) Are you involved in the day-to-day operations of this company? [If NO, you do not need to provide your 10 year work history; and you may proceed to External Affiliations and Government & Military Service Sections.]:	Yes
4. Work History:	
Please explain any gaps (3 months or more) in employment or any overlapping employment::	N/A
If you are involved in the day to day operation of the company that has asked you to complete this form, please provide your work history for the past 10 years, including 1.) Name of Company 2.) Title 3.) Start Date 4.) End Date :	Bourdier & Cie Managing Director 30th June 1992 - Current

5. External Affiliations:

Employment History and Affiliations

1.) Do you have any current external ownership No interests?:

If Yes, please provide the name of the entity owned::

2.) Do you sit on the Board of Directors for any No entity?:

If Yes, please provide the name of the entity/entities for which you are a member of the **Board of Directors::**

3.) Outside of your current employment, listed above, are you currently employed with any other entity?:

No

If Yes, please provide name of company/companies of additional employment and your position::

6. Government & Military Service:

1.) Do you have any current or past government Yes service?

GOVERNMENT: any government agency or office, political party organization, state-owned enterprise, public international organization, agency of a public international organization or schools, universities or hospitals that are stateowned or state subsidized?:

If Yes, please provide: 1.) Name of Government Office 2.) Country 3.) Position/Title 4.) Start Date 5.) End Date:

Office: Caisse des dépôts et

Consignation France

Position: Attaché d'administration June 1976 to October 1978

Foreign Trade Counselor

France 2008 - 2011

2.) Do you have any current or past military service (including compulsory military service)?:

Yes

If Yes, please provide: 1.) Name of Military Branch 2.) Country 3.) Position/Rank 4.) Start Date 5.) End Date:

Air Force France

Compulsory Military Service June 1976 - May 1977

3.) Was your military service compulsory?: Yes

4.) Do you or did you have procurement authority?:

No

Employment History and Affiliations

	Employment history a	na Amilations
Name:	Loic Dayot	
Title:	Shareholder	
Email:	Idayot@ouvaton.org	
2. Basi	c Information:	
1.) WI	hat is your full legal name?:	Loic Alain Raymond Marie Dayot
2.) WI	hat is your citizenship(s)::	French
3. Curr	ent Employment Information:	
•	hat is the name of the company that has I you to complete this form?:	Bourdier & Cie
•	ease select the type of position(s) you hold s company::	Owner
3.) WI	hat is your title?:	Shareholder
4.) WI	hat was your start date?:	06/30/1992
	hat was your end date? (Indicate "none" if re still employed with the company) :	None
of this provide proce	e you involved in the day-to-day operations is company? [If NO, you do not need to de your 10 year work history; and you may sed to External Affiliations and Government itary Service Sections.]:	No
4. Worl	k History:	
	e explain any gaps (3 months or more) in byment or any overlapping employment::	-
the co this fo the pa 1.) Na 2.) Tit 3.) Sta	are involved in the day to day operation of ompany that has asked you to complete orm, please provide your work history for ast 10 years, including time of Company tile art Date	

5. External Affiliations :

Employment History and Affiliations 1.) Do you have any current external ownership No interests?: If Yes, please provide the name of the entity owned:: 2.) Do you sit on the Board of Directors for any No entity?: If Yes, please provide the name of the entity/entities for which you are a member of the **Board of Directors::** 3.) Outside of your current employment, listed Yes above, are you currently employed with any other entity?: If Yes, please provide name of Villejuif City Council -- Chief Information company/companies of additional employment Officer and your position:: 6. Government & Military Service: 1.) Do you have any current or past government Yes service? **GOVERNMENT:** any government agency or office, political party organization, state-owned enterprise, public international organization, agency of a public international organization or schools, universities or hospitals that are stateowned or state subsidized?: If Yes, please provide: 1.) Name of Government Villejuif City Council Office 2.) Country 3.) Position/Title 4.) Start Date France 5.) End Date: Chief Information Officer 24th February 2014 - Current 2.) Do you have any current or past military No service (including compulsory military service)?: If Yes, please provide: 1.) Name of Military Branch 2.) Country 3.) Position/Rank 4.) Start

Date 5.) End Date:

3.) Was your military service compulsory?:

Not applicable, I never served in the military

4.) Do you or did you have procurement authority?:

No

If you answered yes to any of the above government or military questions, please enter any additional clarifying information below::

Employment History and Affiliations

Name: Catherine Lazardeux-Bernabeu

Title: Shareholder

Email: bourdierparis@wanadoo.fr

2. Basic Information:

1.) What is your full legal name?: Catherine Armande Dominique

Lazardeux

2.) What is your citizenship(s):: French

3. Current Employment Information:

1.) What is the name of the company that has asked you to complete this form?:

Bourdier & Cie

2.) Please select the type of position(s) you hold Owner

at this company::

3.) What is your title?:

4.) What was your start date?:

Shareholder

06/30/1992

5.) What was your end date? (Indicate "none" if None you are still employed with the company):

6.) Are you involved in the day-to-day operations No of this company? [If NO, you do not need to provide your 10 year work history; and you may proceed to External Affiliations and Government & Military Service Sections.]:

4. Work History:

Please explain any gaps (3 months or more) in employment or any overlapping employment::

Not applicable.

If you are involved in the day to day operation of Not applicable. the company that has asked you to complete this form, please provide your work history for the past 10 years, including

- 1.) Name of Company
- 2.) Title
- 3.) Start Date
- 4.) End Date

:

5. External Affiliations:

Employment History and Affiliations

1.) Do you have any current external ownership No interests?:

If Yes, please provide the name of the entity owned::

2.) Do you sit on the Board of Directors for any No entity?:

If Yes, please provide the name of the entity/entities for which you are a member of the Board of Directors::

3.) Outside of your current employment, listed above, are you currently employed with any other entity?:

No

If Yes, please provide name of company/companies of additional employment and your position::

6. Government & Military Service:

1.) Do you have any current or past government No service?

GOVERNMENT: any government agency or office, political party organization, state-owned enterprise, public international organization, agency of a public international organization or schools, universities or hospitals that are state-owned or state subsidized?:

If Yes, please provide: 1.) Name of Government Office 2.) Country 3.) Position/Title 4.) Start Date 5.) End Date:

2.) Do you have any current or past military No service (including compulsory military service)?:

If Yes, please provide: 1.) Name of Military Branch 2.) Country 3.) Position/Rank 4.) Start Date 5.) End Date:

3.) Was your military service compulsory?:Not applicable, I never served in the military

4.) Do you or did you have procurement authority?:Not Applicable, I never served the government/military

If you answered yes to any of the above government or military questions, please enter any additional clarifying information below::

Employment History and Affiliations Name: Nathalie Vautier Title: Project Manager Email: bourdierparis@wanadoo.fr 2. Basic Information: 1.) What is your full legal name?: Nathalie Léa Vautier 2.) What is your citizenship(s):: French 3. Current Employment Information: 1.) What is the name of the company that has Bourdier & Cie asked you to complete this form?: 2.) Please select the type of position(s) you hold Employee - Leadership at this company:: 3.) What is your title?: Project Manager 06/20/1997 4.) What was your start date?: 5.) What was your end date? (Indicate "none" if None you are still employed with the company): 6.) Are you involved in the day-to-day operations Yes of this company? [If NO, you do not need to provide your 10 year work history; and you may proceed to External Affiliations and Government & Military Service Sections.]: 4. Work History: Please explain any gaps (3 months or more) in Not applicable. employment or any overlapping employment:: If you are involved in the day to day operation of Bourdier & Cie the company that has asked you to complete **Project Manager**

this form, please provide your work history for the past 10 years, including

June 1997 - Current

- 1.) Name of Company
- 2.) Title
- 3.) Start Date
- 4.) End Date

5. External Affiliations:

Employment History and Affiliations

1.) Do you have any current external ownership No interests?:

If Yes, please provide the name of the entity owned::

2.) Do you sit on the Board of Directors for any No entity?:

If Yes, please provide the name of the entity/entities for which you are a member of the Board of Directors::

3.) Outside of your current employment, listed above, are you currently employed with any other entity?:

No

If Yes, please provide name of company/companies of additional employment and your position::

6. Government & Military Service:

1.) Do you have any current or past government No service?

GOVERNMENT: any government agency or office, political party organization, state-owned enterprise, public international organization, agency of a public international organization or schools, universities or hospitals that are state-owned or state subsidized?:

If Yes, please provide: 1.) Name of Government Office 2.) Country 3.) Position/Title 4.) Start Date 5.) End Date:

2.) Do you have any current or past military No service (including compulsory military service)?:

If Yes, please provide: 1.) Name of Military Branch 2.) Country 3.) Position/Rank 4.) Start Date 5.) End Date :

3.) Was your military service compulsory?:Not applicable, I never served in the military

4.) Do you or did you have procurement authority?:Not Applicable, I never served the government/military

If you answered yes to any of the above government or military questions, please enter any additional clarifying information below::



Financials/



Memo

Date: December 12, 2014

Re: Bourdier & Cie – Financial Reference Clarification

To Whom It May Concern:

The financial audit for Bourdier & Cie uses the name "Bourdier Bernard & Company." The intermediary confirmed that these audited financials are for Bourdier & Cie and that the difference in names was merely human error. The intermediary also confirmed that their financial accounts only use the names Bourdier et Cie, Bourdier & Cie or Bourdier & Co.

Relevant Excerpt Only

Melanie Dickson

From: Bernard BOURDIER <box>

bourdier@bourdierparis.com>

Sent: Thursday, December 11, 2014 11:28 PM

To: Melanie Dickson

Subject: RE: TRACE - Final Questionnaire & Signature

Attachments: RIB €. B Cie.docx; RIB HSBC 001.pdf; Final_Signature_Page_Certification V1-signed.pdf

Dear Ms Dickson,

Regarding financial accounts, it may be my mistake because the Company bank accounts are only under Bourdier et Cie, Bourdier & Cie or Bourdier & Co. For clarification, please, find herewith the RIB of the Company accounts.

I have checked the questionnaire and it is okay. Please, find herewith final signature.

I remain,

Sincerely yours,

Bernard BOURDIER

De: Melanie Dickson [mailto:MDickson@TRACEinternational.org]

Envoyé: jeudi 11 décembre 2014 20:48

À: Bernard BOURDIER

Objet: TRACE - Final Questionnaire & Signature

Dear Mr. Bourdier.

I hope this finds you well. This email contains one clarification question about your financial reference, followed by instructions for completing the certification process.

Clarification Question:

The financial accounts that you provided are for an entity called "Bourdier Bernard & Company." However, in all the other registration and literature documents you have provided, the entity's name is "Bourdier & Cie" or "Bourdier & Co." Please explain this difference and confirm whether the financial accounts are for the same entity as your company.

Completing the Certification Process:

Please find two documents attached to this email. The first attachment is the final version of your questionnaire. Please review this document carefully, as several changes have been made since your original submission. If you require changes to be made to the document, please notify me and I will edit the questionnaire and re-send the updated version.

If no changes are necessary, please sign the second document, the Final Signature Page. Please return the Final Signature Page to me by Monday 15^{th} December.

Your certification will be finalized once we receive the final signature page. Let me know if you have any questions.

Kind regards,

38 RUE DE BERRI

75008 PARIS

COMPTES ANNUELS au 31/12/2013

		Pag	es
- Attestation des comptes		1	
COMPTES ANNUELS			
- Bilan actif-passif	2	et	
- Compte de résultat	4	et à	5
- Annexe	6	à	8
DOSSIER FISCAL			
- Liasse 2065	9	et	10
- Liasses 2050 à 2059-E	11	à	27

ARICE

64 Rue du rocher

75008 PARIS 01 42 60 27 27

ATTESTATION DE PRESENTATION DES COMPTES ANNUELS

Dans le cadre de la mission de présentation des comptes annuels de l'entreprise

BOURDIER BERNARD & CIE 38 RUE DE BERRI 75008 PARIS

pour l'exercice du 01/01/2013 au 31/12/2013,

et conformément à nos accords, j'ai effectué les diligences prévues par la norme professionnelle du Conseil Supérieur de l'Ordre des Experts-comptables applicable à la mission de présentation des comptes qui ne constitue ni un audit ni un examen limité.

Sur la base de mes travaux, je n'ai pas relevé d'éléments remettant en cause la cohérence et la vraisemblance des comptes annuels pris dans leur ensemble tels qu'ils sont joints à la présente attestation.

Les comptes annuels ci-joints se caractérisent par les données suivantes :

- Total du bilan,	2	376	277	Euros
- Chiffre d'affaires HT,		597	139	Euros
- Résultat net comptable.		24	683	Euros

Fait à PARIS Le 18/07/2014

BENFREDJ David Expert-comptable

BOURDIER BERNARD & CIE

38 RUE DE BERRI

75008 PARIS

COMPTES ANNUELS

ARICE 64 Rue du rocher

75008 PARIS 01 42 60 27 27

BILAN ACTIF

ACTIF			Exercice N 31/12/2013 12		Exercice N-1 31/12/2012 12	Ecart N/N-1	
	ACIII	Brut	Amortissements et dépréciations (à déduire)	Net	Net	Euros	%
	Capital souscrit non appelé (I)						
	IMMOBILISATIONS INCORPORELLES Frais d'établissement Frais de développement Concessions, Brevets et droits similaires Fonds commercial (1) Autres immobilisations incorporelles Avances et acomptes						
ACTIF IMMOBILISÉ	IMMOBILISATIONS CORPORELLES Terrains Constructions Installations techniques Matériel et outillage Autres immobilisations corporelles Immobilisations en cours Avances et acomptes	76 569	45 739	:30 830	41 706	10 87 6 -	26.08-
ACT	IMMOBILISATIONS FINANCIERES (2) Participations mises en équivalence Autres participations Créances rattachées à des participations Autres titres immobilisés Prêts Autres immobilisations financières	12 762		12 762	12 762		
	TOTAL II	89 330	45 739	43 592	54 468	10 876	19.97-
ACTIF CIRCULANT	STOCKS ET EN COURS Matières premières, approvisionnements En-cours de production de biens En-cours de production de services Produits intermédiaires et finis Marchandises Avances et acomptes versés sur commandes CRÉANCES (3) Clients et Comptes rattachés Autres créances Capital souscrit - appelé, non versé Valeurs mobilières de placement	2 182 617		2 182 617	2 176 448	6 169	0.28
. =	Disponibilités Charges constatées d'avance (3)	150 068		150 068	314 486	164 418-	52,28-
tes de isatio	TOTAL III	2 332 685		2 332 685	2 490 934	158 249	6.35-
Comptes de Régularisation	Frais d'émission d'emprunt à étaler (IV) Primes de remboursement des obligations (V) Ecarts de conversion actif (VI)						
	TOTAL GÉNÉRAL (I+II+III+IV+V+VI)	2 422 015	45 739	2 376 277	2 545 402	169 125	6.64

⁽¹⁾ Dont droit au bail

12 762

⁽²⁾ Dont à moins d'un an (3) Dont à plus d'un an

BILAN PASSIF

	PASSIF	Exercice N 31/12/2013 12	Exercice N-1 31/12/2012 12	Ecart N / N Euros	V-1 %
× s	Capital (Dont versé : 7 622) Primes d'émission, de fusion, d'apport Ecarts de réévaluation RESERVES Réserve légale Réserves statutaires ou contractuelles Réserves réglementées Autres réserves	7 622	7 622	Euros	76
CAPITAUX	Report à nouveau	999 501-	972 351-	27 149-	2.79
CAI	RESULTAT DE L'EXERCICE (Bénéfice ou perte) Subventions d'investissement Provisions réglementées	24 683	27 149-	51 832	190.91
	TOTALI	967 195-	991 878-	24 683	2.49
AUTRES FONDS PROPRES	Produit des émissions de titres participatifs Avances conditionnées TOTAL II				
PROVISIONS	Provisions pour risques Provisions pour charges TOTAL III				
DETTES(1)	DETTES FINANCIERES Emprunts obligataires convertibles Autres emprunts obligataires Emprunts auprès d'établissements de crédit Concours bancaires courants Emprunts et dettes financières diverses Avances et acomptes reçus sur commandes en cours DETTES D'EXPLOITATION Dettes fournisseurs et comptes rattachés Dettes fiscales et sociales Dettes sur immobilisations et comptes rattachés Autres dettes	1 160 261 2 182 617 595	1 494 044 2 042 642 595	333 783- 139 975	22.34
Comptes de Régularisation	Produits constatés d'avance (1) TOTAL IV	3 343 472	3 537 280	193 808-	5.48
Co Régu	Ecarts de conversion passif (V)				
	TOTAL GENERAL (I+II+III+IV+V)	2 376 277	2 545 402	169 125-	6.6

(1) Dettes et produits constatés d'avance à moins d'un an

3 343 472

3 537 280

COMPTE DE RESULTAT

		cice N 31/12/20		Exercice N-1	Ecart N/N	
	France	Exportation	Total	31/12/2012 12	Euros	%
PRODUITS D'EXPLOITATION (1)				*		
Ventes de marchandises Production vendue de Biens	1					
Production vendue de Services	597 139		597 139	974 516	377 377-	38.
CHIFFRE D'AFFAIRES NET	597 139		597 139	974 516	377 377-	38.
Production stockée						
Production immobilisée						
Subventions d'exploitation	and the second of the second	11200		2.020	2.02	1 + 2
Reprises sur dépréciations, provisions (et ame Autres produits	ortissements), transferts	de charges	0	2 197	2 197- 0	100.
TOTAL DES PRODU	ITS D'EXPLOITATIO	ON CD	597 139	976 712	379 573-	38.
103111 220 11020		(2)	32, 232	210 12	512 515	50.
CHARGES D'EXPLOITATION (2)		-				
Achats de marchandises Variation de stock (marchandises)						
Achats de matières premières et autres appro-	visionnementa					
Variation de stock (matières premières et autr		Š.				
Autres achats et charges externes *			392 254	740 299	348 045-	47.
Impôts, taxes et versements assimilés			2 847	2 944	97-	3,
Salaires et traitements			166 506	240 109	73 603-	30.
Charges sociales						
Dotations aux amortissements et dépréciation			26.40	50.400	2700	14.2
Sur immobilisations : dotations aux an Sur immobilisations : dotations aux dé			10 876	17 027	6 151-	36.
Sur actif circulant : dotations aux dépr	The second was a first to the second					
Dotations aux provisions						
Autres charges						
TOTAL DES CHARG	ES D'EXPLOITATIO	N (II)	572 484	1 000 379	427 895-	42.
I - RESULTAT D'EXPLOITATION (I-II)			24 656	23 667-	48 322	204.
QUOTES-PARTS DE RESULTAT SUR OPERA	TIONS FAITES EN C	COMMUN				
Bénéfice attribué ou perte transférée (III)						
		V 11				

⁽¹⁾ Dont produits afférents à des exercices antérieurs

⁽²⁾ Dont charges afferentes à des exercices antérieurs

COMPTE DE RESULTAT

	Exercice N	Exercice N-1	Ecart N/N		
	31/12/2013 12	31/12/2012 12	Euros	%	
PRODUITS FINANCIERS					
Produits financiers de participations (3) Produits des autres valeurs mobilières et créances de l'actif immobilisé (3) Autres intérêts et produits assimilés (3) Reprises sur dépréciations et provisions, transferts de charges	24	41	16-	39.8	
Différences positives de change Produits nets sur cessions de valeurs mobilières de placement	687	1 506	819-	54.4	
TOTAL V	711	1 547	835-	54.0	
CHARGES FINANCIERES					
Dotations aux amortissements, dépréciations et provisions Intérêts et charges assimilées (4) Différences négatives de change Charges nettes sur cessions de valeurs mobilières de placement	684	5 029	4 345-	86.4	
TOTAL VI	684	5 029	4 345-	86.4	
2. RESULTAT FINANCIER (V-VI)	.27	3 483-	3 510	100.7	
3. RESULTAT COURANT AVANT IMPOTS (I-II+III-IV+V-VI)	24 683	27 149-	51 832	190.9	
PRODUITS EXCEPTIONNELS Produits exceptionnels sur opérations de gestion Produits exceptionnels sur opérations en capital Reprises sur dépréciations et provisions, transferts de charges TOTAL VII					
CHARGES EXCEPTIONNELLES Charges exceptionnelles sur opérations de gestion Charges exceptionnelles sur opérations en capital Dotations aux amortissements, dépréciations et provisions					
TOTAL VIII					
4. RESULTAT EXCEPTIONNEL (VII-VIII)					
Participation des salariés aux résultats de l'entreprise (IX) Impôts sur les bénéfices (X)					
TOTAL PRODUITS (I+III+V+VII)	597 850	978 259	380 409-	38.8	
TOTAL DES CHARGES (II+IV+VI+VIII+IX+X)	573 168	1 005 408	432 241-	42.9	
5. BENEFICE OU PERTE (total des produits - total des charges)	24 683	27 149	51 832	190.9	

^{*} Y compris : Redevance de crédit bail mobilier

[:] Redevance de crédit bail immobilier

⁽³⁾ Dont produits concernant les entreprises liées
(4) Dont intérêts concernant les entreprises liées
Mission de présentation - Voir l'attestation d'Expert Comptable

ANNEXE

Exercice du 01/01/2013 au 31/12/2013

- REGLES ET METHODES COMPTABLES -

(Code du Commerce - Art. R 123-196 1° et 2°; PCG Art. 531-1/1)

Principes et conventions générales

Les comptes de l'exercice clos ont été élaborés et présentés conformément aux règles comptables dans le respect des principes prévus par les articles 120-1 et suivants du Plan Comptable Général 2005.

La méthode de base retenue pour l'évaluation des éléments inscrits en comptabilité est la méthode des coûts historiques.

Les conventions comptables ont été appliquées en conformité avec les dispositions du code de commerce, du décret comptable du 29/11/83 ainsi que des règlements CRC relatifs à la réécriture du plan comptable général 2005 applicables à la clôture de l'exercice.

Permanence des méthodes

Les méthodes d'évaluation retenues pour cet exercice n'ont pas été modifiées par rapport à l'exercice précédent.

- COMPLEMENT D'INFORMATIONS RELATIF AU BILAN -

Etat des immobilisations

	Valeur brute début	Augmen	ntations
	d'exercice	Réévaluations	Acquisitions
Installations générales agencements aménagements divers	10 000		
Matériel de bureau et informatique, Mobilier	66 569		
TOTAL	76 569		
Prêts, autres immobilisations financières	12 762		
TOTAL	12 762		
TOTAL GENERAL	89 330		

ANNEXE

Exercice du 01/01/2013 au 31/12/2013

	Diminutions		Valeur brute en fin	Réévaluation Valeur d'origine
	Poste à Poste	Cessions	d'exercice	fin exercice
Installations générales agencements aménagements divers			10 000	10 000
Matériel de bureau et informatique, Mobilier			66 569	66 569
TOTAL			76 569	76 569
Prêts, autres immobilisations financières			12 762	12 762
TOTAL			12 762	12 762
TOTAL GENERAL			89 330	89 330

Etat des amortissements

Situations et mouvements de l'exercice	Montant début	Dotations	Diminutions	Montant fin
	d'exercice	de l'exercice	Reprises	d'exercice
Installations générales agencements aménagements divers	1 516	1 000		2 516
Matériel de bureau et informatique, Mobilier	33 347	9 876		43 223
TOTAL	34 863	10 876		45 739
TOTAL GENERAL	34 863	10 876		45 739

Ventilation des dotations	Amortissements	Amortissements	Amortissements	Amortissements	dérogatoires
de l'exercice	linéaires	dégressifs	exceptionnels	Dotations	Reprises
Instal.générales agenc.aménag.divers	1 000				
Matériel de bureau informatique mobilier	9 876				
TOTAL	10 876				
TOTAL GENERAL	10 876				

Etat des échéances des créances et des dettes

Etat des créances	Montant brut	A 1 an au plus	A plus d'1 an
Autres immobilisations financières	12 762	0-	12 762
Groupe et associés	2 182 617	2 182 617	
TOTAL	2 195 378	2 182 616	12 762

Etat des dettes		Montant brut	A 1 an au plus	De 1 à 5 ans	A plus de 5 ans
Fournisseurs et comptes rattachés		1 160 261	1 160 261		
Personnel et comptes rattachés		2 182 617	2 182 617		
Autres dettes		595	595		
	TOTAL	3 343 472	3 343 472		

Evaluation des immobilisations corporelles

(Code du Commerce Art. R 123-196 1°)

La valeur brute des éléments corporels de l'actif immobilisé correspond à la valeur d'entrée des biens dans le patrimoine compte tenu des frais nécessaires à la mise en état d'utilisation de ces biens, mais à l'exclusion des frais engagés pour leur acquisition.

ANNEXE

Exercice du 01/01/2013 au 31/12/2013

Evaluation des amortissements

(Code du Commerce Art. R 123-196 2°)

Les méthodes et les durées d'amortissement retenues ont été les suivantes :

Catégorie	Mode	Durée
Agencement travaux	Linéaire	10 ans
Mobilier	Linéaire	5 ans
Matériel de bureau et informat	Dégressif	3 ans

Evaluation des créances et des dettes

(Code du Commerce Art. R 123-196)

Les créances et dettes ont été évaluées pour leur valeur nominale.

Disponibilités en Euros

(Code du Commerce Art. R 123-196 1° et 2°)

Les liquidités disponibles en caisse ou en banque ont été évaluées pour leur valeur nominale.

Disponibilités en devises

(PCG Art. 342-7)

Les liquidités immédiates en devises ont été converties en Euros sur la base du dernier cours de change précédant la clôture de l'exercice. Les écarts de conversion ont été directement comptabilisés dans le résultat de l'exercice en perte ou en gain de change.

Charges à payer

(Code du Commerce Art. R 123-196)

Montant des charges à payer incluses dans les postes suivants du bilan	Montant
Dettes fournisseurs et comptes rattachés	3 600
Total	3 600

BOURDIER BERNARD & COMPANY

38 BERRI STREET

75008 PARIS

ANNUAL ACCOUNTS AS AT DECEMBER 31, 2013

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Attestation of accounts		1	
ANNUAL ACCOUNTS			
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TAX RECORD			
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Profit and loss account	11	to	27

ARICE 64 Rocher Street

75008 Paris 01 42 60 27 27

ATTESTATION OF ANNUAL ACCOUNTS PRESENTATION

In the framework of assignment of presenting annual accounts of

BOURDIER BERNARD & COMPANY 38 BERRI STREET 75008 PARIS

for financial year from January 01, 2013 to December 31, 2013,

and according to our agreements, I have carried out operations provided by professional standard of the High Council of Certified Public Accountants Order, applicable to assignment of presenting accounts, which is neither an audit nor a limited examination.

On the basis of my work, I have not collected elements for questioning coherence and likelihood of these annual accounts taken on the whole as they are herewith enclosed.

Attached annual accounts have following main characteristic data:

Total assets	2,376,277 Euros
Turnover (exclusive of VAT)	597,139 Euros
Accounting net profit	24,683 Euros

Paris, July 18, 2014

BENFREDJ David Certified Public Accountant

BOURDIER BERNARD & COMPANY

38 BERRI STREET

75008 PARIS

ANNUAL ACCOUNTS

ARICE 64 Rocher Street

75008 Paris 01 42 60 27 27

ASSETS BALANCE SHEET

	ASSETS		Year N December 31, 2013 12		Year N-1 Dec.31, 2012 12	Difference	e N/N-1
		Gross	Amortization and Depreciation (to be deducted)	Net	Net	Euro	%
	Subscribed (not called) capital (1)						
FIXED ASSETS	Establishment cost Development cost Concession, patent and similar rights Goodwill (1) Other intangible fixed assets Advances and down payments TANGIBLE FIXED ASSETS Land Building works Technical installation, equipment and tools Other tangible fixed assets Work in progress Advances and down payments FINANCIAL FIXED ASSETS (2) Contributions equivalent value Other contributions Contributions related active debts Fixed assets other title deeds Loans	76,569	45,739	30,830	41,706	10,876-	26.08-
	Other financial fixed assets	12,762	45.720	12,762	12,762	10.07/	10.07
n CURRENT ASSETS	Raw materials and supplies Product in progress Service in progress Semi-finished and finished product Goods Advances and down payments for orders ACTIVE DEBTS (3) Account receivables Other active debts Unpaid subscribed and called capital Investment transferable values Liquid assets Expenses considered as advances (3) TOTAL III	2,182,617 150,068 2,332,685	45,739	2,182,617 150,068 2,332,685	2,176,448 314,486 2,490,934	6,169 164,418- 158,249	0.28 26.08- 52.28- 6.35-
Regularization accounts	Fees for public offer of loan (IV) Debt reimbursement premium (V) Difference from assets conversion rate (VI)						
	GENERAL TOTAL (I+II+III+IV+V+VI)	2,422,015	45,739	2,376,277	2,545,402	169,125-	6.64-

⁽¹⁾ of which lease rent(2) of which for less than one year(3) of which for less than one year

LIABILITIES AND EQUITY BALANCE SHEET

		Year N	Year N-1	Difference	: N/N-1	
	LIABILITIES	Dec. 31, 2013 12	Dec.31, 2012 12	Euro	%	
	Capital (of which paid up capital: 7,622)	7,622	7,622			
	Issue, merger, contribution premium					
	Re-evaluation difference					
S	RESERVES					
TAL	Legal reserve					
OWNED CAPITAL	Articles-provided or contractual reserves					
70 0	Regulation-provided reserves					
NE	Other reserves					
M C	Carrying forward	999,501-	972,351-	27,149-	2.79-	
	FINANCIAL YEAR BUSINESS RESULT (Profit or loss)	24,683	27,149-	51,382	190.91	
	Investment subventions					
	Regulation-provided provisions	0/4 405	004.070	0.4.400	0.40	
S	TOTAL I Issued capital	961,195-	991,878-	24,683	2.49	
Other owned funds	issued capital					
vned	Conditional advances					
er ov						
Oth	TOTAL II					
	Provisions for risks					
sions	Provisions for contingencies					
Provisions	Frovisions for contingencies					
	TOTAL III					
	FINANCIAL DEBTS					
	Convertible bonds					
	Other bonds					
	Loans obtained from credit institutions					
S	Current bank aids					
EBTS	Various financial loans and debts					
DE	Advances and down-payments received for orders					
	OPERATION DEBTS					
	Debts to suppliers and account payables	1,160,261	1,494,044	333,783-	22.34-	
	Fiscal and social debts	2,182,617	2,042,642	139,975	6.85	
	Fixed assets related debts					
	Other debts	595	595			
ntio ts						
Jariza	Proceeds considered as advances (1)					
Regularizatio n accounts	TOTAL IV	3,343,472	3,537,280	193,808-	5.48-	
<u> </u>	Difference from liabilities conversion rate (V)	0.07/.077	2 5 4 5 4 0 2	1/0 105	/ / 4	
	GENERAL TOTAL (I+II+III+IV+V)	2,376,277	2,545,402	169,125-	6.64-	

(1) Debts and proceeds considered as advances for less than one year

3,343,472

3,537,280

PROFIT AND LOSS ACCOUNT

	Year N	December 31, 2013	12	Year N-1	Difference N/N-1		
	France	Exportation	Total	Dec.31, 2012 12	Euro	%	
OPERATING PROCEEDS (1)							
Sales of goods							
Production and sale of goods							
Production and sale of services	597,139		597,139	974,516	377,377-	38.72-	
NET TURNOVER	597,139		597,139	974,516	377,377-	38.72-	
Stocked products		•					
Products converted in fixed assets							
Operation subventions							
Trade-in from depreciations, provisions and amortizations, transfer of expenses				2,197	2,197-	100.00-	
Other proceeds			0		0		
TOTAL OPERATING PROCEED	OS (I)		597,139	976,712	379,573-	38.86-	
OPERATING EXPENSES (2)							
Purchase of goods							
Stock impairment loss (goods)							
Other purchases							
Stock impairment loss (materials and other supplies)							
Other purchases and outside expenses*			392,254	740,299	348,045-	47.01-	
Taxes and similar payments			2,847	2,944	97-	3.30-	
Salary and wages			166,506	240,109	73,603-	30.65-	
Social expenses							
Allowances for amortizations and depreciations							
For fixed assets amortizations			10,876	17,027	6,151-	36.12-	
For fixed assets depreciations							
For current assets depreciations							
Allowances for provisions							
Other expenses							
TOTAL OPERATING EXPENSE	S (II)		572,484	1,000,379	427,895-	42.77-	
1. OPERATING RESULT (I – II)			24,656	23,667-	48,322	204.18	
SHARES FROM JOINT OPERATIONS RESULT							
Shared profit or transferred loss (III)							
Borne loss or transferred profit (IV)							

⁽¹⁾ including previous financial years related proceeds (2) including previous financial years related expenses

PROFIT AND LOSS ACCOUNT

	Year N December 31, 2013 12	Year N-1 Dec.31, 2012 12	Difference	ce N/N-1	
	2013 12		Euro	%	
FINANCIAL PROCEEDS					
Financial proceeds from profit sharing (3)					
Proceeds from other transferable values and fixed assets active debts (3)					
Other interest and similar proceeds (3)	24	41	16-	39.82-	
Trade-in from depreciations & provisions, transfer of expenses					
Exchange positive difference	687	1,506	819-	54.41-	
Net proceeds from transfer of investment transferable values					
TOTAL V	711	1547	835-	54.02-	
FINANCIAL EXPENSES					
Allowances for amortizations, depreciations and provisions					
Interests and similar expenses (4)					
Exchange negative difference	684	5,029	4,345-	86.40-	
Net expenses for transfer of investment transferable values					
TOTAL VI	684	5,029	4,345-	86.40-	
2. FINANCIAL OPERATING RESULT (V - VI)	27	3,483-	3510	100.78	
3. CURRENT OPÉRATION RESULT BEFORE TAX (I-II+III-IV+V-VI)	24,683	27,149-	51,832	190.91	
EXCEPTIONAL PROCEEDS					
Exceptional proceeds from management operations					
Exceptional proceeds from capital operations					
Trade-in from depreciations & provisions, transfer of expenses					
TOTAL VII					
EXCEPTIONAL EXPENSES					
Exceptional expenses for management operations					
Exceptional expenses for capital operations					
Allowances for amortizations, depreciations and provisions					
TOTAL VIII					
4.EXCEPTIONAL OPERATING RESULTS					
Employees' share of enterprise operating results (IX)					
Profit tax (X)					
TOTAL PROCEEDS (I+III+V+VII)	597,850	978,259	380,409-	38.89-	
TOTAL EXPENSES (II+IV+VI+VIII+IX+X)	573,168	1,005,408	432,241-	42.99-	
5. PROFIT OR LOSS (total proceeds – total expenses)	24,683	27,149-	51,832	190.91	

* Including: tax on credit for movables lease tax on credit for property lease

- (1) of which proceeds related to associated enterprises(2) of which interests related to associated enterprises

ANNEX

Financial year From January 01, 2013 to December 31, 2013

- ACCOUNTING RULES AND METHODS

(Business Code - Art. R 123-196 1º and 2º; PCG Art. 531-1/1)

General Principles and conventions

Accounts of ended financial year have been elaborated and presented in compliance with accounting rules, with observance of article 120-1 and next ones of 2005 General Accounting Plan.

Basic method used for evaluation of accounting recorded elements is historical costs method.

Accounting conventions have been applied in compliance with business code provisions, with accounting decree dated November 29, 1983 and with CRC regulations on re-writing of 2005 General Accounting Plan, to be applied to financial year closing.

Permanency of applied methods

Evaluation methods used for this financial year have not been modified as compared to preceding financial year

- BALANCE SHEET RELATED COMPLEMENTARY INFORMATION

Actual status of fixed assets

			ase
	financial year beginning	Re-evaluation	Acquisition
General installation, various equipment and facilities	10,000		
Office equipment, informatic equipment, furniture	66,569	,569	
TOTAL	76,569		
Loans, other financial fixed assets	12,762		
TOTAL	12,762		
GENERAL TOTAL	89,330		

ANNEX

Financial year From January 01, 2013 to December 31, 2013

	Decr	ease	Gross value at	Re-evaluation Original value
	Item to item	Transfer	financial year end	at financial year end
General installation, various equipment and facilities			10,000	10,000
Office equipment, informatic equipment, furniture			66,569	66,569
TOTAL			76,569	76,569
Loans, other financial fixed assets			12,762	12,762
TOTAL			12,762	12,762
GENERAL TOTAL			89,330	89,330

Actual status of amortizations

Situation and movements in financial year	Value at financial year beginning	Equipment in financial year	Decrease Trade-in	Value at financial year end
General installation, various equipment and facilities	1,516	1,000		2,516
Office equipment, informatic equipment, furniture	33,347	9,876		43,223
TOTAL	34,863	10,876		45,739
GENERAL TOTAL	34,863	10,876		45,739

	Linear	Degressive	Exceptional	Irregular amortizations	
Breakdown of equipment provision in financial year	amortizations	amortizations	amortizations	Equipment	Trade-in
Gen. installation, various equipment and facilities	1,000				
Office equipment, informatic equipment, furniture	9,876				
TOTAL	10,876				
GENERAL TOTAL	10,876				

Actual status of active and passive debts due dates

Actual status of active debts	Gross amount	Term of payment not more than 1 year	Term of payment more than 1 year
Other financial fixed assets	12,762	0-	12,762
Group and partners	2,182,617	2,182,617	
TOTAL	2,195,378	2,182,617	12,762

Actual status of passive debts	Gross amount	Term of payment not more than 1 year	Term of payment from 1 to 5 years	Term of payment more than 5 years
Suppliers and account payables	1,160,261	1,160,261		
Staff and account payables	2,182,617	2,182,617		
Other debts	595	595		
TOTAL	3,343,472	3,343,472		

Evaluation of tangible fixed assets

(Business Code Art. R 123-196 1º)

Gross value of fixed assets tangible elements corresponds to the property value when it is integrated into such assets, including any cost necessary for repairing and maintaining such property at its functioning status, but excluding any buying expense.

Accounting unit: Euro

Presentation assignment – See attestation issued by Certified Public Accountant ARICE

ANNEX

Financial year From January 01, 2013 to December 31, 2013

Evaluation of amortizations

(Business Code Art. R 123-196 2º)

Applied amortization methods and duration are as follows:

Category	Amortization mode	Amortization duration
Building work fitting out	Linear	10 years
Movable properties	Linear	5 years
Office and informatic equipment	Degressive	3 years

Evaluation of active and passive debts

(Business Code Art. R 123-196)

Active and passive debts have been evaluated according to nominal value

Liquid assets in Euro

(Business Code Art. R 123-196 1º and 2º)

Cash available in hand or at bank has been evaluated according to nominal value

Liquid assets in foreign currency

(PCG Art. 342-7)

Immediate liquidities in foreign currency have been converted into Euro on the basis of last exchange rate just before financial year closing date. Conversion differences have been directly recorded in operating result as exchange loss or profit.

Expenses to be paid

(Business Code Art. R 123-196)

Balance sheet items in which expenses to be paid are included	Amount
Debts to suppliers and account payables	3,600
TOTAL	3,600



Business References



Business Reference Contact Record for Bourdier et Cie

Contact Name	Company	Phone Number	Email Address	Date Received
Lay Chan Wee	CAE Inc.	+1 (514) 885-0308	laychan.wee@cae.com	October 29, 2014
Patrick Hertzog	AXIMUM	+33 1 30 15 42 18	hertzog@aximum.fr	October 29, 2014
Philippe Wallet	Air France	+33 6 85 31 53 80	phwallet@airfrance.com	October 29, 2014



Reputational Screening



Reputational Screening for

· _____

- > Reputational Screening Search Parameters
- > Reputational Screening Results Summaries
- > Copies of Articles/Documents Pertaining to Results Summaries (if applicable)



Reputational Screening Search Parameters

Internet Based Search (Google)

Entity name and name(s) of significant owners (single largest shareholder and others who hold 33% or greater ownership interest) are searched. Streamlined renewal searches will only include the Internet Based Search when changes to the entity name or significant owners are submitted.

Entity names are searched as provided omitting any preface or ending (i.e. M/S, JSC, Inc). Individual names are searched as confirmed in the Name Confirmation Document. Names are searched relative to the words: bribery, corruption, criminal, allegation, unethical.

TRACE reviews the first 20 results. Negative media is summarized and included in this report.

Denied Party/PEP Screening

All entities and individuals that are found to be associated with the intermediary are searched.

Entity and individuals' names are searched through a database of PEP (Politically Exposed Persons) lists and international sanctions and enforcement (Denied Parties) lists. The search includes Sanctions, Law Enforcement, Regulatory Enforcement and Other Bodies lists.

TRACE reviews all results. Direct hits are summarized and included in this report.

Media Search (Westlaw)

All entities and individuals that are found to be associated with the intermediary are searched.

Entity names are searched as provided omitting any preface or ending (i.e. M/S, JSC, Inc). Individual names are searched as confirmed in the Name Confirmation Document including variations noted in the file excluding confirmed misspellings.

Names are searched within 70 words of bribery, corruption, criminal, allegation, unethical and variations of those words to allow the broadest search possible. The initial search period covers 10 years. The renewal searches cover either a period from the last search to date or 10 years if the subject of the search is new. Streamlined renewal searches include only names that have been added or removed from the report.

TRACE reviews all results. However, if we receive excessive results we will set limiting parameters on the search. Only negative media is summarized and included in this report.



Reputational Screening Results Summary for Bourdier & Cie

December 8, 2014

No adverse results were found.



Training



TRACE Anti-Bribery Course

This is to certify that

has successfully completed the coursework and the examination for the TRACE Anti-Bribery Course and has thereby earned this certificate.

www.TRACEinternational.org



Code of Conduct



TRACE Code of Conduct

The Principals of Bourdier & Cie have adopted the following Code of Conduct with respect to all of their commercial transactions, whether local or international:

LOCAL AND FOREIGN LAWS: No officer, employee or representative of Bourdier & Cie may, directly or indirectly, break or seek to evade the laws or regulations of any country in, through or with which it seeks to do business. That an illegal act is a "customary business practice" in any country is not sufficient justification for violation of this provision.

BRIBERY and FACILITATING PAYMENTS: No officer, employee or representative of Bourdier & Cie may, directly or indirectly, offer or provide a bribe and all demands for bribes must be expressly rejected.

Bribery includes any offer, promise, or gift of any pecuniary or other advantage, whether directly or through intermediaries, to a public official, political party, political candidate or party official or any private sector employee, in order that the official or employee act or refrain from acting in relation to the performance of their duties, in order to obtain or retain business or other business advantage.

Bourdier & Cie and its officers, employees and representatives shall not offer or make facilitating payments to government officials in order to encourage them to expedite a routine governmental task that they are otherwise required to undertake. Bourdier & Cie shall have discretion to deviate from this prohibition if the government action sought is an urgent matter concerning health or safety. Bourdier & Cie recognizes that extortion is widespread and that participation by the business community increases demand for facilitating payments.

KICK-BACKS: No officer, employee or representative of Bourdier & Cie may "kick-back" any portion of a contract payment to employees of other parties to a contract or use other vehicles such as subcontracts, purchase orders or consulting agreements to channel payments to government officials, political candidates, employees of other parties to a contract, their relatives or business associates.

A "kickback" is a particular form of bribe which takes place when a person entrusted by an employer or public function has some responsibility for the granting of a benefit and does so in a way that secures a return (kickback) of some of the value of that transaction or benefit for that person without the knowledge or authorization of the employer or public body to which the person is accountable.

CONFLICTS OF INTEREST: Officers, employees and representatives of Bourdier & Cie shall avoid any relationship or activity that might impair, or appear to impair, his or her ability to render objective and appropriate business decisions in the performance of his or her job.

POLITICAL CONTRIBUTIONS: Neither Bourdier & Cie nor any of its officers, employees or representatives may make a political contribution in order to obtain an unlawful business advantage. Bourdier & Cie shall comply with all public disclosure requirements.

PHILANTHROPIC CONTRIBUTIONS: Bourdier & Cie and its officers, employees and representatives may make contributions only for bona fide charitable purposes and only where permitted by the laws of the





country in which the contribution is made. Contributions made in order to obtain an unlawful business advantage are prohibited.

EXTORTION: Bourdier & Cie and its officers, employees and representatives shall reject any direct or indirect request by a public official, political party, party official, or private sector employee for undue pecuniary or other advantage, to act or refrain from acting in relation to his or her duties.

GIFTS, HOSPITALITY AND ENTERTAINMENT: Bourdier & Cie and its officers, employees and representatives shall avoid the offer or receipt of gifts, meals, entertainment, hospitality or payment of expenses whenever these could materially affect the outcome of business transactions, are not reasonable and bona fide expenditures, or are in violation of the laws of the country of the recipient.

REPORTING REQUIREMENT: Officers, employees and representatives of Bourdier & Cie who find themselves subjected to any form of extortion or who are asked to participate in any way in a bribery scheme shall promptly report these occurrences to senior corporate management, without fear that their employment will be adversely affected.

COMPANY RESPONSE: No employee will suffer demotion, penalty, or other adverse consequences for not paying bribes even when Bourdier & Cie may lose business as a result of the employee's refusal to do so. Employees are encouraged to report alleged violations of this Code of Conduct to senior management and no employee will suffer demotion, penalty or adverse consequences for reporting.

Bourdier & Cie will, where appropriate, sanction employees, suppliers or business partners for violations of this Code of Conduct.

COMPANY ACCOUNTS: Bourdier & Cie shall maintain complete and accurate financial records, ensuring that all transactions are properly, accurately and fairly recorded in a single set of books.

COMMUNICATIONS AND TRAINING: Bourdier & Cie will make annual training available for all principals, key employees involved in sales, marketing and procurement.

The person whose signature appears below is duly authorized to adopt this Code of Conduct on behalf of Bourdier & Cie.

I hereby agree to comply with the TRACE Code of Conduct as outlined above. I understand that a violation of the Code of Conduct will be grounds for immediate expulsion from TRACE.

Bernard BOURDIER	Managing Director	
Printed/Typed Name	Title	
Poe	20 th October 2014	
Signature	Date	



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