



**T**certification  
*THE DUE DILIGENCE STANDARD*

# Due Diligence Report

It means that an individual or company has completed a heavily benchmarked and comprehensive due diligence process administered by Tcompliance, a leading provider of widely benchmarked third party risk management solutions. Certification by Tcompliance signifies that an entity has completed internationally accepted due diligence procedures and has been forthcoming and cooperative during the review process. The successful completion of Tcertification demonstrates a commitment to commercial transparency, allowing the certified entity to serve as a valued business partner to multinational companies.

## Tcertification Report at a Glance:

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- › Detailed company information, including information on subsidiaries, third parties and affiliated entities
- › Responses to enforcement questions covering government penalties, felonies, criminal acts and bankruptcy
- › Business registrations, as applicable
- › Business information
- › Audited financial statement (other financial documents can be accepted in lieu of audited financials)
- › Beneficial ownership (except for shareholders owning less than 5% of publicly-traded companies)
- › Identification of directors and key employees
- › Additional ownerships, directorships and employment of all owners, directors and key employees
- › Government employment of owners, directors and key employees
- › Government positions held by family members of owners, directors and key employees
- › Contact information for three business references
- › Corporate literature or a company description
- › Continuously screens all names against watchlists, international sanctions, Politically Exposed Persons (PEP) and denied parties databases
- › Adverse media search in English and in the local language dating back seven years
- › Litigation search dating back seven years
- › Continuous monitoring for a full year
- › Code of conduct addressing bribery
- › Completion of global anti-bribery eLearning (available in 29 languages)
- › Confirmation of compliance policies and implementation of policies covering anti-bribery and human trafficking
- › Quantitative assessment using machine learning methods

## Advantages of Being Tcertified:

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- › Gain a valuable compliance credential that differentiates you from competitors and is widely recognized in the international business community.
- › Receive a copy of your verified due diligence report to share with an unlimited number of existing and prospective business partners.
- › Include your name, or company's name, in the Tcompliance Intermediary Directory, a publicly searchable database of potential business partners for multinational companies.
- › Train up to 40 employees on anti-bribery compliance using Tcompliance's multilingual eLearning course\*.
- › Display the Tcompliance logo in your marketing materials and on your website to showcase your commitment to transparency and supply chain integrity.

*Tcertification is not a guarantee against past or potential wrongdoing by the certified entity or a guarantee against potential liability. A summary of any "red flags" identified during the Tcertification review will be included in the report, but not all red flags preclude Tcertification. Depending on the nature, size and scope of the proposed project with an intermediary, more extensive due diligence may be warranted.*

*\*If you wish to train over 40 employees or access additional training courses outside of the Global Anti-Bribery Compliance Course, a fee of US\$50 per user per course will be incurred. For more information on Tcompliance Training Packages, contact a Tcompliance representative.*

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ATELIERS BIGATA SAS certifies that the information provided in the following report is, to the best of its knowledge and belief, accurate, current and complete.

ATELIERS BIGATA SAS certifies that to the best of its knowledge, neither ATELIERS BIGATA SAS nor any of its employees or third parties acting on its behalf have offered or given anything of value to a government official in order to obtain or retain business or receive an improper business advantage.

ATELIERS BIGATA SAS agrees to notify Tcompliance promptly of any material changes to the information provided herein.

The person whose signature appears below is authorized to certify on behalf of ATELIERS BIGATA SAS that the information is true and correct.

Full Name: Sébastien GAFFET

Date: 18 May 2022



# Due Diligence Summary

The **Tcompliance** due diligence review of commercial intermediaries 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 intermediary. Companies requesting **Tcompliance** reports agree that in no event shall **Tcompliance** be liable for any damages incurred as a result of relying on **Tcompliance** reports or as a result of any omission or misrepresentation by an intermediary reviewed by **Tcompliance**.

This report contains personal information about individuals that is subject to strict legal protections under applicable data protection laws. You may only review this report or such personal information if you are appropriately authorized and have a need to know, to access or to otherwise process such information. This report is for the internal use of the requesting company only; it may not be sold or transferred in whole or in part. You must exercise due care in safeguarding this information and take all necessary steps to prevent any loss, theft, corruption or release of this information to unauthorized persons. If you have any questions or concerns regarding these obligations, contact Tcompliance's Data Protection Officer at [DPO@tcompliance.com](mailto:DPO@tcompliance.com).

ATELIERS BIGATA SAS

Tcertification ID: TC4192-7898

15 May 2022 - 14 May 2023

**Due diligence is not a guarantee against past or potential wrongdoing or against potential liability.**

**Depending on the nature, size, scope and location of the proposed project with an intermediary, more extensive due diligence may be warranted.**

No "red flags" or significant areas of concern were identified during the due diligence review.



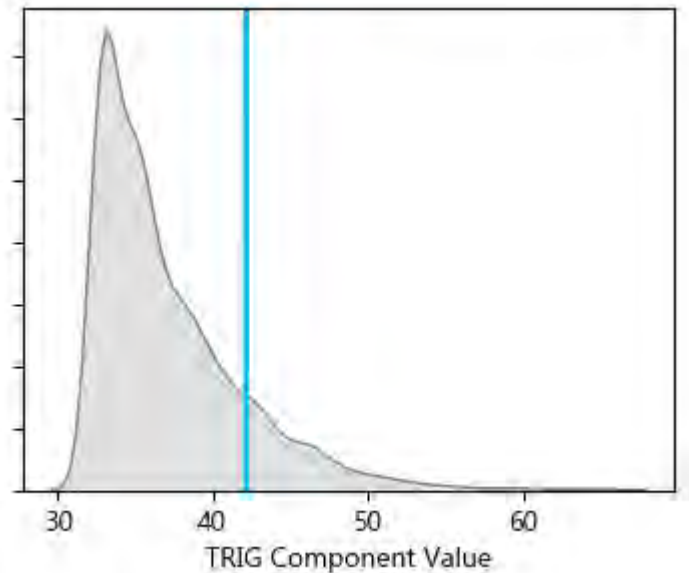
*Due diligence undertaken by Tcompliance shall not be used to support or promote business in Iran or other sanctioned countries.*



# Tcompliance Intermediary Generality Component

## What is TRIG?

Using machine learning methods, the Tcompliance Intermediary Generality Component (TRIG Component) goes beyond the identification of red flags by quickly sorting through high volumes of data to compare a particular Tcertified due diligence report to every report Tcompliance has completed in the last three years. This results in a quantitative assessment that provides pragmatic insights into the report and matters that may require further investigation. The algorithm uses thousands of variables, from questionnaire responses to final signatures, to determine peculiarity and produces a single value that serves as a distillation of how different the report is compared to the others. The TRIG Component value doesn't necessarily signal higher risk; instead, it provides a holistic indicator of the normality of a given Tcertification report, improving due diligence quality and coverage and delivering more value and risk-relevant information.



## How to interpret analysis:

The TRIG Component Value is 42.14 for this report. The vertical line in the above plot represents the value of the TRIG Component. The further the line is to the left, the more standard the report is. For context, the plot shows the distribution of all TRIG Components in the last three years and where this Tcertification report falls among them. Many different factors can cause a report to be considered unusual, so a high TRIG Component - one that falls in the far right of the distribution - does not necessarily indicate greater risk or any problems in the due diligence process, but it may warrant particular attention relative to more ordinary reports.

*The Tcompliance Intermediary Generality Component ("TRIG Component") has been designed to identify the degree to which a given Tcertification review, taken as a whole, is similar to or different from other Tcertification reviews we have performed in the last three years.*

*The procedure for generating a TRIG Component makes use of advanced machine learning techniques applied to a wide range of information about the review process, both substantive and procedural, discerning and relying on patterns that may not be evident from a direct inspection of the Tcertification report. It is therefore not possible to say in any given case on what specific facts a given score is based.*

*A higher TRIG score does not in itself signal an elevated risk. Nor does a lower score necessarily indicate lower risk. The TRIG Component should not be interpreted in isolation from the totality of the associated Tcertification report, but may be used to identify reports whose atypicality warrants a measure of additional attention.*



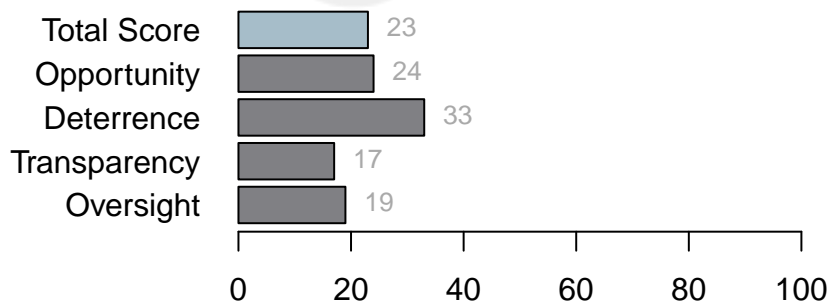
# France

**Overall Risk Score: 23**

**Risk Level: low**

This score is a composite of the four domain scores discussed below, which are weighted and combined to produce the overall country risk score. Each country is given a score from 1 to 100 for each domain and for the total bribery risk. A higher score indicates a higher risk of business bribery. Assessments of whether a given domain score is “good” or “poor” are made relative to all other jurisdictions within that domain.

1. **Business Interactions with Government:** France receives a good score of 24 in this domain, based on a low degree of government interaction, a low expectation of bribes, and a low regulatory burden.
2. **Anti-bribery Deterrence and Enforcement:** France receives a good score of 33 in this domain, based on a medium quality of anti-bribery dissuasion and a high quality of anti-bribery enforcement.
3. **Government and Civil Service Transparency:** France receives a very good score of 17 in this domain, based on very good governmental transparency and good transparency of financial interests.
4. **Capacity for Civil Society Oversight:** France receives a good score of 19 in this domain, based on a high degree of media freedom/quality and a high degree of civil society engagement.



## TRACE Bribery Risk Typology:

### Democracy with complex economy

This group generally consists of stable, democratic states with complex, diverse economies and fair-to-weak civil societies.

Comparable Jurisdictions	Matrix Scores
South Korea	21
Spain	25
Italy	30

Learn more about the TRACE Bribery Risk Matrix and Bribery Risk Typology at [matrixbrowser.TRACEinternational.org](https://matrixbrowser.TRACEinternational.org)





# Business Information

Company / Individual's Full Legal Name: *ATELIERS BIGATA SAS*

Doing Business As Name or Trade/Marketing Name: *Ateliers Bigata*

Address of Headquarters/ Principal Place of Business: *ZAC Mermoz - 10, rue Jean Baptiste Perrin*

City: *Eysines*

State/Province: *Gironde*

Country/Region/Territory: *France*

Postal Code: *33320*

Telephone: *+33 5.56.28.61.70*

Website: *<http://www.bigata.net>*

**For questions about this report, contact:**

Contact Person: *Sébastien Gaffet*  
Work E-mail Address: *sebastien.gaffet@bigata.net*  
Job Title/Position: *General Manager*

Primary Industry: *Aviation*

Types of services: *Distributor, Supplier, Other: Repairer*

ATELIERS BIGATA SAS provides services in the following countries: *France*

ATELIERS BIGATA SAS asks to be paid, and makes payments from: *France*

Method(s) by which ATELIERS BIGATA SAS prefers to receive payments: *Wire Transfer*

Brief description of the types of services that ATELIERS BIGATA SAS provides: *The range of activities includes the maintenance, repair and overhaul of manual and automatic fire extinguishers, cylinders, regulators and oxygen masks for crews and passengers, and pressurized safety system reservoirs (landing gear, escape slides, doors), along with cleaning and retesting of aeronautical tubing.*

Additional Information: *The intermediary clarified "We may provide services to customers in countries other than France. Services are provided as the occasion may arise". As of May 2022, the intermediary is not providing services outside of France.*

*The commercial registration notes the commercial name "Bigata". It is confirmed that "Bigata" is not considered a Marketing name.*

*In the registration, the address is also written adding "Technoparc" after rue Jean Baptiste Perrin. However, Ateliers Bigata SAS confirmed that "it doesn't really make difference. "ZAC Mermoz" is the address we are using for deliveries".*



# Registration Information

ATELIERS BIGATA SAS was established on: *22 January 1943*

Additional Information: *The company began operations in December 1942 and was registered in January 1943.*

Tax Identification Number of ATELIERS BIGATA SAS: *46020040500039*

ATELIERS BIGATA SAS is registered as a legal entity and holds the following registrations, licenses or certifications:

Registration Number:	<i>1960B00040</i>
Registration Date:	<i>22 January 1943</i>
Expiration Date:	<i>22 January 2042</i>
Office/Entity/Agency:	<i>Commercial Court Registry of Bordeaux</i>
City:	<i>Bordeaux</i>
Country/Region/Territory:	<i>France</i>
Copy of this registration:	





N° de gestion 1960B00040

**Extrait Kbis****EXTRAIT D'IMMATRICULATION PRINCIPALE AU REGISTRE DU COMMERCE ET DES SOCIÉTÉS**

à jour au 13 février 2022

**IDENTIFICATION DE LA PERSONNE MORALE**

<i>Immatriculation au RCS, numéro</i>	460 200 405 R.C.S. Bordeaux
<i>Date d'immatriculation</i>	22/01/1943
<i>Dénomination ou raison sociale</i>	<b>ATELIERS BIGATA SAS</b>
<i>Forme juridique</i>	Société par actions simplifiée (Société à associé unique)
<i>Capital social</i>	130 000,00 Euros
<i>Adresse du siège</i>	Technoparc Mermoz Rue Jean Baptiste Perrin 33320 Eysines
<i>Activités principales</i>	Etude, concept et réalisation de réparation et d'équipement de systèmes et de structures aéronautiques et industrielles
<i>Durée de la personne morale</i>	Jusqu'au 22/01/2042
<i>Date de clôture de l'exercice social</i>	31 décembre

**GESTION, DIRECTION, ADMINISTRATION, CONTRÔLE, ASSOCIÉS OU MEMBRES****Président**

<i>Dénomination</i>	SIGOGNAC FINANCE
<i>Forme juridique</i>	Société à responsabilité limitée à associé unique
<i>Adresse</i>	10 Rue Jean Baptiste Perrin 33320 Eysines
<i>Immatriculation au RCS, numéro</i>	507 959 005 RCS Bordeaux

**Directeur général**

<i>Nom, prénoms</i>	GAFFET Sébastien Thierry
<i>Date et lieu de naissance</i>	Le 11/05/1975 à Tourcoing (59)
<i>Nationalité</i>	Française
<i>Domicile personnel</i>	39 Allée Radio 33600 Pessac

**Commissaire aux comptes titulaire**

<i>Dénomination</i>	EXCO ECAF
<i>Forme juridique</i>	Société anonyme à directoire et conseil de surveillance
<i>Adresse</i>	174 Avenue du Truc 33700 Mérignac
<i>Immatriculation au RCS, numéro</i>	320 544 000 RCS Bordeaux

**Commissaire aux comptes suppléant**

<i>Nom, prénoms</i>	LAFARGUE Philippe
<i>Domicile personnel ou adresse professionnelle</i>	174 Avenue du Truc 33700 Mérignac

**RENSEIGNEMENTS RELATIFS À L'ACTIVITÉ ET À L'ÉTABLISSEMENT PRINCIPAL**

<i>Adresse de l'établissement</i>	Technoparc Mermoz Rue Jean Baptiste Perrin 33320 Eysines
<i>Nom commercial</i>	BIGATA
<i>Activité(s) exercée(s)</i>	Matériel pour gaz comprimés (activité apportée).
<i>Date de commencement d'activité</i>	17/12/1942
<i>Origine du fonds ou de l'activité</i>	Apport
<i>Précédent exploitant</i>	

**Greffé du Tribunal de Commerce de Bordeaux**

PALAIS DE LA BOURSE

CS 51474

33064 BORDEAUX CEDEX

N° de gestion 1960B00040

*Dénomination*

MR BIGATA DESIRE RC Redact ET MR BIGATA GEORGES RC  
Redact

*Mode d'exploitation*

Exploitation directe

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*Branche d'activité*

Etude, concept et réalisation de réparation et d'équipement de systèmes et de structures aéronautiques et industrielles

*Date de commencement d'activité*

10/10/2019

*Origine du fonds ou de l'activité*

Création

*Mode d'exploitation*

Exploitation directe

Le Greffier



FIN DE L'EXTRAIT



English translation of this registration:



Clerk of the Commercial Court of Bordeaux  
PALAIS DE LA BOURSE  
CS 51474  
33064 BORDEAUX CEDEX

Verification code: 5k46XC6P3e  
<https://www.infogreffe.fr/controle>

Management n° 1960B00040

*Kbis extract (company registration)*

**EXTRACT OF THE MAIN REGISTRATION IN THE REGISTRY OF BUSINESSES AND COMPANIES**  
on 8 May 2019

**IDENTIFICATION OF THE LEGAL ENTITY**

RBC registration n°	460 200 405 R.B.C. Narbonne
Registration date	22/01/1943
Company name	<b>ATELIERS BIGATA SAS</b>
Legal form	Simplified Joint Stock Company with a single shareholder
Social Capital	130,000.00 Euros
Address of the head office	Rue Jean Baptiste Perrin Technoparc Mermoz 33320 Eysines
Duration of the legal entity	Up to 22/01/2042
Financial year closing date	31 December

**MANAGEMENT, DIRECTION, ADMINISTRATION, CONTROL, SHAREHOLDERS OR MEMBERS**

**President**

Name	SIGOGNAC FINANCE
Legal form	Limited company with a single shareholder
Address	10 Jean Baptiste Perrin 33320 Eysines
RBC registration n°	507 959 005 R.B.C. Bordeaux

**Director General**

Last name, first names	GAFFET Sébastien Thierry
Date and place of birth	11/05/1975 in Tourcoing (59)
Nationality	French
Personal address	39 Allée Radio 33600 Pessac

**Statutory auditor**

Name	EXCO ECAF
Legal form	Limited liability company with a board of directors and a supervisory board.
Address	174 Avenue DU TRUC 33700 Mérignac
RBC registration number	320 544 000 RBC Bordeaux

**Alternate auditor**

Last name, first names	LAFARGUE Philippe
Personal or professional address	174 Avenue DU TRUC 33700 Mérignac

**INFORMATION REGARDING ACTIVITY AND THE MAIN ESTABLISHMENT**

Address of the main establishment	Rue Jean Baptiste Perrin Technoparc Mermoz 33320 Eysines
Commercial name	BIGATA
Activities exercised	Equipment for compressed gas (activity transferred), trading of any industrial or domestic equipment directly or indirectly linked or complementary to the activity of the company (activity created)
Activity start date	17/12/1942
Origin of funds or the activity	Transfer
Previous operator	
Name	MR BIGATA DESIRE <span style="background-color: black; color: red;">Redacted</span> AND MR BIGATA GEORGES <span style="background-color: black; color: red;">Redacted</span>

RBC Bordeaux - 09/05/2019 - 08:43:32

Certifié conforme à la copie  
Ne varietur 1371 2019



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**Clerk of the Commercial Court of Bordeaux**  
PALAIS DE LA BOURSE  
CS 51474  
33064 BORDEAUX CEDEX

Management n° 1960B00040

*Operating method*

Direct operating

The Clerk  
*[Stamp: Clerk of the commercial court]*

END OF EXTRACT



Certifié conforme à la copie  
Ne varietur 137/2019



*Additional Information: The intermediary clarified that Desire and Georges Bigata, mentioned in the registration, are not involved in the company in any capacity.*

*The original registration in French is dated 13 February 2022, but the translation is dated 08 May 2019. Intermediary clarified: "We don't have a more recent translation but I confirm that the information in both match".*

*Please, note that Philippe LaFargue is an external auditor.*





# Ownership Information & Board of Directors

ATELIERS BIGATA SAS is a Private Company.

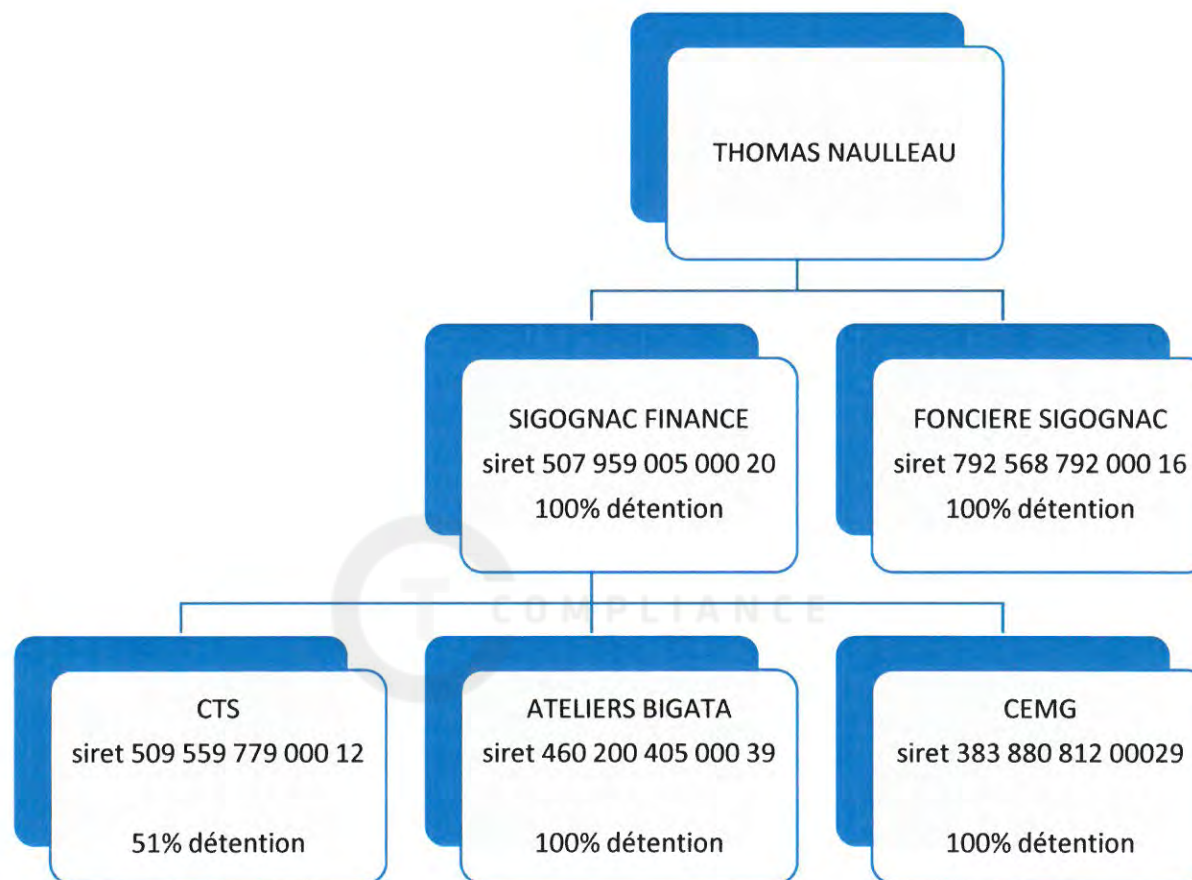
No individuals have an ownership interest in ATELIERS BIGATA SAS.

The following corporations/other legal entities have an ownership interest in ATELIERS BIGATA SAS:

Entity Name:	<i>Sigognac Finance Sarl</i>
Country of Incorporation:	<i>France</i>
Ownership Percent:	<i>100%</i>
Ownership Information:	<i>Thomas Naulleau (100%)</i>

Ownership Chart for ATELIERS BIGATA SAS:





ATELIERS BIGATA SAS does not have a Board of Directors.

Additional Information: *On the ownership chart, CTS refers to CTS Consulting and Technical Support and CEMG refers to CEMG Aerosauvetage.*





# Personnel

ATELIERS BIGATA SAS's total number of personnel (including managers and directors): 50

The following personnel of ATELIERS BIGATA SAS are authorized to make binding decisions for ATELIERS BIGATA SAS and enter into contracts with clients:

Name:	<i>Thomas Naulleau</i>
Job Title/Position:	<i>Chief Executive Officer</i>
.....	
Name:	<i>Sébastien Gaffet</i>
Job Title/Position:	<i>General Manager</i>

The following personnel of ATELIERS BIGATA SAS market or sell products/services to customers:

Name:	<i>Laurence Hamonou</i>
Job Title/Position:	<i>Sales Executive</i>
.....	
Name:	<i>Adriaan Marshall</i>
Job Title/Position:	<i>Sales Executive</i>

The following personnel of ATELIERS BIGATA SAS may interact with a government official or government entity:

Name:	<i>Joan Martin Lopez</i>
Job Title/Position:	<i>Quality Director</i>

Additional Information: *It was confirmed that, as of 2022, nobody else has the responsibilities to be considered in this section.*





# Name Confirmations

Name Provided to Tcompliance	Given/First Name	Middle Name(s) / Patronymic	Family/Last Name(s)	Name(s) Commonly Used in Business
Thomas Naulleau	Thomas	Sebastian Jean	Naulleau	Thomas Naulleau
Sébastien Gaffet	Sébastien	Thierry	Gaffet	Sébastien GAFFET
Laurence Hamonou	Laurence		Hamonou	Laurence Hamonou
Adriaan Marshall	Dirk	Adriaan	Marshall	Adriaan Marshall
Joan Martin Lopez	Joan		Martin Lopez	Joan Martin Lopez

Additional Information: *It is confirmed that Laurence Hamonou and Joan Martin Lopez do not have a middle name.*



# Resumes/CVs

Name: *Thomas Naulleau*

Citizenship: *France*

Thomas Naulleau is involved in the day-to-day operations of ATELIERS BIGATA SAS.

Company/Entity	Position	Beginning Date	Does Thomas Naulleau <u>currently</u> hold this position?	Ending Date
ATELIERS BIGATA SAS	Chief Executive Officer/Indirect Shareholder	November 2008	Thomas Naulleau currently holds this position.	

Thomas Naulleau holds the following positions or ownership interests in entities other than ATELIERS BIGATA SAS:

Company: *CEMG Aerosauvetage*

Position: *Chief Executive Officer*

Company: *CTS Consulting and Technical Support*

Position: *Chief Executive Officer*

Company: *Fonciere Sigognac*

Position: *Chief Executive Officer/Shareholder*

Company: *Sigognac Finance Sarl*

Position: *Chief Executive Officer/Shareholder*

Company: *Cogisys SA*

Position: *Chairman of the Board*

Thomas Naulleau has not held or worked in a government or military position in the last seven years.

Thomas Naulleau does not currently hold any position with a political party or political campaign and is not currently a candidate for any political office.

No family members of Thomas Naulleau currently hold any government positions.

Additional Information about Thomas Naulleau: *CEMG is an acronym and stands for Centre Entretien Materiel Gonflable (Inflatable Material Maintenance Center).*

Name: *Sébastien Gaffet*

Citizenship: *France*

Sébastien Gaffet is involved in the day-to-day operations of ATELIERS BIGATA SAS.

Company/Entity	Position	Beginning Date	Does Sébastien Gaffet <u>currently</u> hold this position?	Ending Date
ATELIERS BIGATA SAS	General Manager	January 2010	Sébastien Gaffet currently holds this position.	

Sébastien Gaffet holds the following positions or ownership interests in entities other than ATELIERS BIGATA SAS:

Company: *CEMG Aerosauvetage*

Position: *General Manager*

Sébastien Gaffet has not held or worked in a government or military position in the last seven years.

Sébastien Gaffet does not currently hold any position with a political party or political campaign and is not currently a candidate for any political office.

No family members of Sébastien Gaffet currently hold any government positions.



Name: *Laurence Hamonou*

Citizenship: *France*

Laurence Hamonou is involved in the day-to-day operations of ATELIERS BIGATA SAS.

Company/Entity	Position	Beginning Date	Does Laurence Hamonou <u>currently</u> hold this position?	Ending Date
ATELIERS BIGATA SAS	Sales Executive	June 2018	Laurence Hamonou currently holds this position.	
Gallery Stock	Account Manager	March 2012	No	February 2018

Laurence Hamonou does not hold a position or ownership interest in any entity other than ATELIERS BIGATA SAS.

Laurence Hamonou has not held or worked in a government or military position in the last seven years.

Laurence Hamonou does not currently hold any position with a political party or political campaign and is not currently a candidate for any political office.

No family members of Laurence Hamonou currently hold any government positions.



Name: *Adriaan Marshall*

Citizenship: *France*

Adriaan Marshall is involved in the day-to-day operations of ATELIERS BIGATA SAS.

Company/Entity	Position	Beginning Date	Does Adriaan Marshall <u>currently</u> hold this position?	Ending Date
ATELIERS BIGATA SAS	Sales executive	November 2020	Adriaan Marshall currently holds this position.	
ATELIERS BIGATA SAS	Project Manager	June 2019	No	November 2020
ATELIERS BIGATA SAS	Development Engineer	September 2018	No	May 2019

Explanation of any gaps in employment (1 year or more): *Ateliers Bigata is his first employer*

Adriaan Marshall does not hold a position or ownership interest in any entity other than ATELIERS BIGATA SAS.

Adriaan Marshall has not held or worked in a government or military position in the last seven years.

Adriaan Marshall does not currently hold any position with a political party or political campaign and is not currently a candidate for any political office.

No family members of Adriaan Marshall currently hold any government positions.



Name: *Joan Martin Lopez*

Citizenship: *France*

Joan Martin Lopez is involved in the day-to-day operations of ATELIERS BIGATA SAS.

Company/Entity	Position	Beginning Date	Does Joan Martin Lopez <u>currently</u> hold this position?	Ending Date
ATELIERS BIGATA SAS	Quality Director	January 2008	Joan Martin Lopez currently holds this position.	

Joan Martin Lopez does not hold a position or ownership interest in any entity other than ATELIERS BIGATA SAS.

Joan Martin Lopez has not held or worked in a government or military position in the last seven years.

Joan Martin Lopez does not currently hold any position with a political party or political campaign and is not currently a candidate for any political office.

No family members of Joan Martin Lopez currently hold any government positions.





Additional Information: *We confirm none of the companies listed in the CV/Resume section provide third party services for ATELIERS BIGATA SAS.*





# Associated Offices & Entities

ATELIERS BIGATA SAS does not have any subsidiary organizations or joint ventures.

ATELIERS BIGATA SAS does not have any branch offices.

ATELIERS BIGATA SAS is part of a group companies:

Name of the Group: *Sigognac Finance Sarl*

ATELIERS BIGATA SAS's Relationship to the Group: *Part of the Group*

This group is a Legal Entity.

This group company will not be involved in transactions for or provide services to ATELIERS BIGATA SAS's clients/vendors/suppliers.

The following companies are part of this group:

Name: *CEMG Aerosauvetage*

This group company will not be involved in transactions for or provide services to ATELIERS BIGATA SAS's clients/vendors/suppliers.

Name: *CTS Consulting and Technical Support*

This group company will not be involved in transactions for or provide services to ATELIERS BIGATA SAS's clients/vendors/suppliers.

Name: *Fonciere Sigognac*

This group company will not be involved in transactions for or provide services to ATELIERS BIGATA SAS's clients/vendors/suppliers.

Name: *Sigognac Finance*

This group company will not be involved in transactions for or provide services to ATELIERS BIGATA SAS's clients/vendors/suppliers.

Name: *Cogisys SA*

This group company will not be involved in transactions for or provide services to ATELIERS BIGATA SAS's clients/vendors/suppliers.

ATELIERS BIGATA SAS does not use any individual or entity to provide any services or to perform any part of ATELIERS BIGATA SAS's activities.

ATELIERS BIGATA SAS has not been a party to any mergers or acquisitions over the past 5 years.

No other person, entity, government or government entity has any management right or financial interest in ATELIERS BIGATA SAS.

Additional Information: *We confirm we do not use any other companies or individuals to assist in providing services in any of the countries where we provide services. This includes other companies in the group.*



## Other Engagements

ATELIERS BIGATA SAS will not market products or services to any government, government-controlled, or military entity, including state-owned enterprises.

ATELIERS BIGATA SAS does not have any contracts with, or provide services directly to, any government, government-controlled or military entity, including any state-owned enterprises.

No people listed in this report directly have any contracts with, or provide services directly to, any government, government-controlled or military entity, including any state-owned enterprises.

Additional Information: *The intermediary confirmed they interact with public authorities for administrative purposes.*





# Enforcement Information

No person or company associated with ATELIERS BIGATA SAS was convicted of violating any rules or regulations governing the purchase or sale of goods or services to or by any government within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was interviewed, deposed or subpoenaed in connection with any litigation or investigation involving any government regulations within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was found guilty of violating any law governing donations, contributions, honoraria or any other form of remuneration to any government official or any individual working for a commercial enterprise within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was 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 or any individual working for a commercial enterprise within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was interviewed, subpoenaed or asked to testify before any legislative body concerning fraud or abuse with regard to any governmental procurements within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was found guilty of any violations of securities or commodities trading laws within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was interviewed, deposed or subpoenaed in connection with any litigation or investigation involving any violations of securities or commodities trading laws within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was found guilty of any violation of any laws governing the regulation of antitrust practices within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was the subject of, or mentioned by name in, any newspaper or magazine article in an adverse manner within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was charged, interviewed or found guilty concerning income tax evasion within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was convicted of a felony or other criminal act for any matter not listed above within the past seven years.

Excluding traffic charges, no person associated with ATELIERS BIGATA SAS was 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 within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was debarred from competing for World Bank contracts within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was debarred from competing for government contracts in any country within the past seven years.

No person or company associated with has had a security clearance denied or revoked within the past seven years.

No person associated with ATELIERS BIGATA SAS was discharged from any Armed Forces with other than an honorable discharge within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was the subject of any voluntary or involuntary bankruptcy or other similar proceeding within the past seven years.

No person or company associated with ATELIERS BIGATA SAS is named on any regulatory or government watch lists.

No person or company associated with ATELIERS BIGATA SAS has admitted guilt for, was convicted of, or has been under investigation for Trade Control violations (such as violations of export controls, sanctions or anti-boycott laws or regulations) within the past seven years.

No person or company associated with ATELIERS BIGATA SAS was placed on any restricted parties lists within the past seven years.

No person or company associated with ATELIERS BIGATA SAS has any offices or other operations in Cuba, Iran, North Korea or Syria.

No person or company associated with 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 Cuba, Iran, North Korea or Syria or otherwise serviced (or requested services in relation to) products located in these countries without the requisite license in place within the past seven years.







# Literature

ATELIERS BIGATA SAS did not provide a brochure, company profile, or other literature. Please visit ATELIERS BIGATA SAS's website (if available) for additional information.

ATELIERS BIGATA SAS did not provide pictures of offices, facilities and equipment relevant to providing services.





# Financials

ATELIERS BIGATA SAS stated that their books and records are maintained in accordance with standard recognized accounting practices.

ATELIERS BIGATA SAS has a recent audited financial statement prepared by an external auditor.

Financial document: *Reference letter from external accountant*

A copy of the recent financial document:



## ATTESTATION

Thomas FONDEVILA, Certified Public Accountant and partner of the accounting firm ERECApluriel Bordeaux, 10 rue FURTADO, 33800 BORDEAUX, France certifies for the company ATELIERS BIGATA SAS, 10 rue Jean Baptiste Perrin – ZA Mermoz, 33320 EYSINES, France, that :

1. In compliance with our letter of engagement signed on January 12th 2015 and in compliance with the code of ethics of the accounting professionals and the professional standards of the Conseil Supérieur de l'Ordre des experts comptables, we have an engagement of presenting financial statement for the company ATELIER BIGATA SAS since January 1st 2015.
2. The financial statements of the company ATELIER BIGATA SAS were established in accordance with French accounting principles.

Bordeaux, March 23rd 2021,

Thomas FONDEVILA

**ERECapluriel Bordeaux**

Certified Public Accountant



ATELIERS BIGATA SAS has certified that it is adequately financed and has sufficient resources to conduct business.





# Business References

### Business References:

Company Name: *Safran*  
Contact Name: *Julien Baptiste*  
Job Title: *VP Sales*  
Work Email Address: *julien.baptiste@zodiacaerospace.com*  
City: *Plaisir*  
Country: *France*  
Telephone: *+33 1 61 34 24 88*

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Company Name: *Meggitt*  
Contact Name: *Ross Hamilton*  
Job Title: *Vice president Sales*  
Work Email Address: *Ross.hamilton@meggitt.com*  
City: *Coventry*  
Country: *United Kingdom*  
Telephone: *+ 44 777 5534 691*

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Company Name: *Jet Aviation*  
Contact Name: *Joerg Bortoluzzi*  
Job Title: *Director Supply Chain*  
Work Email Address: *joerg.bortoluzzi@jetaviation.com*  
City: *Basel-EuroAirport*  
Country: *Switzerland*  
Telephone: *+41 58 158 4249*





# Compliance Information

## Tcompliance Code of Conduct

ATELIERS BIGATA SAS hereby adopts the following Code of Conduct with respect to all commercial transactions, whether local or international:

**LOCAL AND FOREIGN LAWS:** Neither ATELIERS BIGATA SAS, nor anyone acting on behalf of ATELIERS BIGATA SAS, may, directly or indirectly, break or seek to evade the laws or regulations of any country in, through, or with which ATELIERS BIGATA SAS 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:** Neither ATELIERS BIGATA SAS, nor anyone acting on behalf of ATELIERS BIGATA SAS, 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.

Neither ATELIERS BIGATA SAS, nor anyone acting on behalf of ATELIERS BIGATA SAS, shall 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. ATELIERS BIGATA SAS, or anyone acting on behalf of ATELIERS BIGATA SAS, shall have discretion to deviate from this prohibition if he/she believes that there is an immediate threat to his/her or another's health or safety. The circumstances of such payment must be reported as soon as possible after the event and the payment properly recorded. ATELIERS BIGATA SAS recognizes that extortion is widespread and that participation by the business community increases demand for facilitating payments.

**KICK-BACKS:** Neither ATELIERS BIGATA SAS, nor anyone acting on behalf of ATELIERS BIGATA SAS, may offer or accept a “kick-back” of 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:** ATELIERS BIGATA SAS, and anyone acting on behalf of ATELIERS BIGATA SAS, shall avoid any relationship or activity that might impair, or appear to impair, the ability to render objective and appropriate business decisions in the performance of our jobs.

**POLITICAL CONTRIBUTIONS:** Neither ATELIERS BIGATA SAS, nor anyone acting on behalf of ATELIERS BIGATA SAS, may make a political contribution in order to obtain an unlawful business advantage. ATELIERS BIGATA SAS shall comply with all public disclosure requirements.

**PHILANTHROPIC CONTRIBUTIONS:** ATELIERS BIGATA SAS, and anyone acting on behalf of ATELIERS BIGATA SAS, 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:** ATELIERS BIGATA SAS, and anyone acting on behalf of ATELIERS BIGATA SAS, 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:** ATELIERS BIGATA SAS, and anyone acting on behalf of ATELIERS BIGATA SAS, 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:** All officers and employees of ATELIERS BIGATA SAS and anyone acting on behalf of ATELIERS BIGATA SAS shall promptly report any actual or potential violation of this Code of Conduct, including any instance in which he/she is subjected to any form of extortion or is asked to participate in any way in a bribery scheme, to ATELIERS BIGATA SAS senior corporate management, without fear that his/her business relationship or employment will be adversely affected. Reports shall be treated confidentially to the extent possible, consistent with the need to conduct a thorough investigation.

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

ATELIERS BIGATA SAS shall, where appropriate, sanction employees, suppliers or other business partners for violations of this Code of Conduct.

**ACCOUNTS:** ATELIERS BIGATA SAS 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:** ATELIERS BIGATA SAS agrees to participate in anti-corruption training provided by Tcompliance, or by a comparable organization, and to make annual training available for all principals and for all 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 ATELIERS BIGATA SAS and, if signing on behalf of a company, agrees that this Code shall apply to all officers, employees and representatives of ATELIERS BIGATA SAS.

I hereby adopt and agree to comply with the Tcompliance Code of Conduct as outlined above.

I understand that violation of the Code of Conduct will be grounds for immediate revocation of Tcompliance Certification, if applicable.

Electronic Signature: *Sebastien Gaffet*

Title: *General Manager*

Date: *22 March 2022*

ATELIERS BIGATA SAS will distribute this anti-bribery policy to its employees.

ATELIERS BIGATA SAS's anti-bribery policy is not applicable to subsidiaries, affiliates, joint-venture partners, suppliers, subcontractors and other third parties, as ATELIERS BIGATA SAS does not have subsidiaries, affiliates or joint venture partners and/or does not engage suppliers, subcontractors or other third parties.

ATELIERS BIGATA SAS has a written compliance policy.

The compliance policy is distributed to employees.

ATELIERS BIGATA SAS's compliance policy is not applicable to subsidiaries, affiliates, joint-venture partners, suppliers, subcontractors and other third parties, as ATELIERS BIGATA SAS does not have subsidiaries, affiliates or joint venture partners and/or does not engage suppliers, subcontractors or other third parties.

ATELIERS BIGATA SAS has a system that allows its employees to ask questions or report concerns regarding compliance and anti-bribery matters.

ATELIERS BIGATA SAS does not conduct periodic assessments of compliance and anti-bribery risks.

*Additional Information: We are currently working on the compliance for our company: it is our goal to improve in this way.*

ATELIERS BIGATA SAS has a policy addressing human rights awareness, education and training.

ATELIERS BIGATA SAS has certified that it is compliant with all applicable laws and international standards that prohibit forced labor, slavery, human trafficking and the worst forms of child labor everywhere that ATELIERS BIGATA SAS conducts business.

ATELIERS BIGATA SAS has a DUNS number: 274773217





# Reputational Screening

## Results Summary

Searches were conducted on relevant names provided in the questionnaire.

**No results were found.**



## Companies and People Screened

The reputational screening included the following names of companies\* and individuals from the questionnaire. No reportable results were found on any names other than those included in the Results Summary.

ATELIERS BIGATA SAS

Sigognac Finance Sarl

CEMG Aerosauvetage

Fonciere Sigognac

CTS Consulting and Technical Support

Cogisys SA

Thomas Sebastian Jean Naulleau

Sébastien Thierry Gaffet

Laurence Hamonou

Joan Martin Lopez

Dirk Adriaan Marshall

*\*Tcompliance does not search the names of companies publicly traded on a recognized stock exchange or the names of major financial institutions, airlines, shipping and logistics companies, and terminal operators unless it is the name of the entity being vetted in the report. Individuals' name variations have been included in the search, as well as doing business as/trade names of the entity being vetted, as applicable.*



# Anti-Bribery Training





## *Tcompliance Anti-Bribery Course*

This is to certify that on  
10 May 2021

**Thomas Naulleau**

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

<https://www.tcompliance.com>



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**EMAIL:**

[info@tpms.tcompliance.com](mailto:info@tpms.tcompliance.com)

**WEBSITE:**

<https://www.tcompliance.com>

**TEL:** +1 410.834.1711

**TCOMPLIANCE**

151 West Street  
Annapolis, MD 21401