Policy on Prevention and Detection of the Risk of Corruption and Influence Peddling
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1. PURPOSE AND SCOPE OF THE POLICY

1.1 PURPOSE

Preventing the risk of corruption and influence peddling is a long-established part of Thales's ethics, integrity and compliance policy. This strict, proactive policy is built on the values and principles defined in the Group's Code of Ethics, and on rigorous compliance with applicable regulations.

The Code of Ethics lays down the rules of behaviour applicable within the Group, with respect to employees, customers, suppliers, subcontractors, partners, shareholders, financial markets and society as a whole.

The Board of Directors and the Executive Committee have a zero-tolerance policy concerning corruption and influence peddling. To protect Thales's reputation, competitive performance, and the long-term future of its businesses, preventing corruption and influence peddling is absolutely vital. This is why the Group – in accordance with the main legal requirements and recommendations issued by various national authorities – has defined, keeps up to date and controls a system for detecting and preventing corruption and influence peddling defined by this policy and by the applicable rules and procedures. All of the elements referred to above make up the Thales group's Anti-Corruption Management System, in accordance with the standard NF ISO 37001.

1.2 SCOPE

Thales's policy on the prevention of corruption and influence peddling applies (i) to all companies directly or indirectly controlled by Thales, and (ii) to all employees of the Thales group. In addition, a specific anticorruption compliance system applies to joint ventures under majority or joint control, and to companies in which Thales has a minority shareholding.

Thales also expects its partners and suppliers to comply with laws and regulations, to adhere to the principles set out in the Partners and Suppliers - Integrity and Corporate Responsibility Charter, and to exercise due diligence for the purpose of detecting and preventing corruption and influence peddling in their business relationships.

1.3 APPLICABLE DOCUMENTS

Public Documents available in the Corporate Responsibility section of the Thales group website (www.thalesgroup.com):

- Code of Ethics [1]
- Integrity and Compliance Charter for Partners and Suppliers [3]
- Internal Alert System [4]
2. MEASURES FOR PREVENTION OF CORRUPTION AND INFLUENCE PEDDLING

2.1 CODE OF CONDUCT – PREVENTION OF CORRUPTION AND INFLUENCE PEDDLING

2.1.1 THE CODE OF CONDUCT
In line with the commitments set out in the Code of Ethics [1], the Group has drawn up a Code of Conduct on Prevention of Corruption and Influence Peddling [2], which defines and illustrates the types of conduct that could constitute an act of corruption or influence peddling.

The Code of Conduct, available in several languages, has been distributed and is available to employees. It is incorporated into the internal rules of the Group's French entities, or adopted in Group entities pursuant to local rules.

Failure by an employee to adhere to the provisions of this Code of Conduct is liable to result in a disciplinary sanction, up to and including dismissal, according to applicable regulations.

2.1.2 INSTRUCTIONS AND GUIDES SUPPLEMENTARY TO THE CODE OF CONDUCT

2.1.2.1 GIFTS AND INVITATIONS
Employees are required to ensure that any gifts and invitations are given or received for a legitimate business purpose, are not aimed at obtaining or offering an undue advantage or unduly influencing a decision, and do not give the appearance of such an aim.

The instruction on Gifts and Invitations defines the approval rules and requirements to be met by Group employees before giving or accepting a gift or invitation.

Above the value thresholds specified in instructions, prior approval by the line manager of the employee concerned is required before offering or accepting a gift or invitation. Extra scrutiny is required in certain circumstances, particularly in the case of gifts and invitations offered to (or by) Public Officials or Politically Exposed Persons. Such cases also require prior approval by a Compliance Officer. In addition, the Group does not make any financial contributions to election candidates, elected representatives or political parties.

The Gifts and Hospitality instruction strictly prohibits the Group employees to offer or accept Facilitation Payments in the performance of their duties. Facilitation Payments are small sums paid directly or indirectly to a Public official (for example, a customs or immigration official) in return for diligently performing an administrative procedure or easing a bureaucratic process.

2.1.2.2 COMMUNITY INVESTMENT, SPONSORSHIP AND MEMBERSHIPS
Community investment and sponsorship projects must comply with applicable legislation, and must be conducted in order to meet a legitimate charitable or professional objective. They must never be aimed at obtaining or offering an undue advantage or unduly influencing a decision, or give the appearance of such an aim.

The instruction on Community Investment, Sponsorship and Memberships defines the approval rules and requirements to be met by Group employees who are planning to undertake community investment and
sponsorship activities, or to become a member of a professional association. This instruction is designed to be used, in conjunction with the **Community Investment and Sponsorship Policy Guidelines**, which set out the Group’s priorities in terms of social engagement and corporate social responsibility (CSR).

### 2.1.2.3 CONFLICT OF INTERESTS

Thales expects its employees to avoid any conflict of interest in their business activities. The **Policy on Detection, Prevention and Management of Conflict of Interests** is designed to help employees identify real or potential conflict of interest situations linked, in particular, to their personal or professional status, or encountered in the exercise of an elected or public office. In accordance with this policy, employees have a duty to report and/or prevent any real or potential conflict of interest situation at the time of their recruitment, when moving to a new role and subsequently within the scope of their work. The policy defines measures for dealing with real or potential cases of conflict of interest (project postponement, change in role for a limited period, amended responsibilities, enhanced monitoring arrangements, etc.).

### 2.2 GROUP INTERNAL ALERT SYSTEM

The internal alert system is designed to enable any Thales group employee, casual employees and external staff to report any conduct or situations that are contrary to the company’s **Code of Ethics** [1], to the **Code of Conduct on Prevention of Corruption and Influence Peddling** [2], and more generally, any serious and manifest violation of laws or regulations, or even any serious threat, or serious harm to the public interest. The internal alert system is available from the Group intranet and internet sites. Alerts may be reported by any means (by dedicated email address alert.thales@thalesgroup.com, by dedicated phone number +33 1 57 77 87 19, by letter sent to the Vice-President, Ethics, Integrity and Corporate Responsibility at the headquarters).

Moreover, the Group reserves the right to handle any type of alert, regardless of the channel used (email, letter sent to the President, etc.)

In some countries, the Group system is supplemented by a local alert system.

The **Instruction for managing the Internal Alert System** sets out the arrangements applicable to the management and the handling of alerts received via the internal alert system. A **Guide** [4] summarize the conditions and arrangements for use of this internal alert system.

Thales undertakes not to take disciplinary action, terminate employment or discriminate against any employee who reports, in good faith and in impartial manner, acts that fall within the scope of the internal alert system, even if the facts are subsequently shown to be incorrect, or do not give rise to any follow-up action.

In addition, measures are implemented to guarantee that the identity of the individual raising an alert, the facts of the alert report, and the identity of the person(s) who are the subject of the alert report, are kept confidential. The Vice-President, Ethics, Integrity and Corporate Responsibility shall check, in due course, and, by all means that he/she considers necessary, that the Thales employee who has initiated an alert is not subject to disciplinary action or discrimination as a result of having made a report in accordance with the internal alert procedure.

The mission of the Alert Monitoring Committee is to follow up the processing of the alerts deemed actionable pursuant to the **Instruction for managing the internal alert system**. It is made up of the Heads of the Ethics,
Integrity and Corporate Responsibility Department, of the Legal & Contracts Department, and of any other person designated by them. The members of the Alert Monitoring Committee shall appoint the persons within the Group who shall be in charge of processing the alert, and, as appropriate, may refer the case to the Integrity and Compliance Committee, who may decide to trigger an Internal Investigations.

The dedicated instruction on Internal Investigations regarding Integrity and Compliance defines the arrangements for conducting Internal Investigations triggered and followed up by the Integrity and Compliance Committee.

2.3 IDENTIFYING RISKS OF CORRUPTION AND INFLUENCE PEDDLING

To manage risks and support the sustainable development of its business activities Thales draws up, on a semestrial basis, at Group level, at GBU, Business Lines and Large Countries level, risks maps addressing the operational, strategic, governance, compliance and financial risks. Moreover, a specific map of corruption and influence peddling risks is drawn up every year.

The Audit, Risks and Internal Control Department is responsible for drawing up and keeping these maps up to date. The map of corruption and influence peddling risks is finalized jointly by the Audit, Risks and Internal Control Department and the Ethics, Integrity and Corporate Responsibility Department within the Integrity and Compliance Committee and validated by the Risks Management Committee. The map of corruption and influence peddling risks is further presented to the Group Executive Committee and to the Audit and accounts Committee, and then shared with the Chief Compliance Officers and the management committees of the GBU and Large Countries.

In addition, a risks map is conducted every year at each Group’s operational entity level, through the Yearly Attestation Letters (YAL), comprising, among the scenarios of operational, financial and compliance risks covered, a risk scenario on the “Risk of corruption and influence peddling”. This map is conducted by each of these entities, and is validated by their executive manager. The accuracy and compliance of the declarations are subject to internal audits conducted by the Audit, Risks and Internal Control Department.

2.4 SYSTEM FOR ASSESSING THE INTEGRITY OF THIRD PARTIES

The Thales group pays special attention to the integrity of third parties with whom it has a business relationship, in order to avoid becoming implicated, whether directly or indirectly, in acts of corruption or influence peddling.

The instruction – Third Parties Integrity Assessment defines the risk profiles associated with each category of third party. It also sets out the appropriate prevention measures that all Thales group companies shall observe when intending to enter into or continue a business relationship with a third party (in particular a customer, tier one supplier/subcontractor, distributor, intermediary, joint venture partner, acquisition target, etc.).

These rules are designed to meet the following objectives: (i) determine the risk profile of a Third Party; (ii) implement preventive measures appropriate to the identified level of risk (such as signing up to an Integrity and Corporate Responsibility Charter for Partners and Suppliers, entering into contractual undertakings, or verifications based on an integrity questionnaire or due diligence carried out by a specialist service provider).
(iii) define appropriate measures in light of the results of the assessment carried out (entry into or continuation of a business relationship, implementation of an action plan, suspension or termination of a business relationship).

This instruction is supplemented by further instructions dedicated to the process for selecting and managing certain categories of third parties (consultants, M&A stakeholders).

2.5 ACCOUNTING CONTROL PROCEDURES

In accordance with applicable laws and regulations, the Group has put in place procedures designed to ensure the legality, accuracy and compliance of financial and accounting information.

The Finance Departments of each entity control the proper implementation of these procedures.

For this, they rely on the Internal Control Questionnaire (ICQ), a self-assessment questionnaire offering a methodology for verification of the Group’s accounting methods and procedures. This questionnaire, sent to many Group’s entities, includes more than 150 points of control, some of which are specifically contributing to the control of the risks of fraud, corruption and influence peddling.

This questionnaire is drawn up and kept up to date annually by the Audit, Risks and Internal Control Department, with the assistance of the Finance Department and the Group’s external auditors. The accuracy and consistency of the ICQ answers are audited by the Audit, Risks and Internal Control Department.

2.6 TRAINING IN THE RISK OF CORRUPTION AND INFLUENCE PEDDLING

The Thales group has implemented a training dedicated to the prevention of corruption and influence peddling that comprises an online training (e-learning) module as well as face-to-face training.

A map of the most exposed functions, consistent with the map of corruption and influence peddling risks, is conducted every year by the Ethics, Integrity and Corporate Responsibility Department, in coordination with the Human Resources Department, by combining a set of criteria (job family segment, level of responsibility, country with a high corruption perception index according to Transparency International). This mapping defines three levels of potential exposure (low, moderate and strong), which are used as a basis for determining the appropriate training plan.

The online training (e-learning) module is mandatory for managers and staff holding position exposed to the risk of corruption and influence peddling (low, moderate and strong exposure); the face-to-face training is mandatory for the managers and staff holding the most exposed positions (strong exposure). The online training (e-learning) module is also available to all employees, from the eLearning of Thales Learning Hub. It is available in French and in English. Face-to-face training is delivered mainly by members of the Legal & Contracts family who have been trained via a special “Train the Trainer” course.
2.7 DISCIPLINARY REGIME IN THE EVENT OF VIOLATION OF THE CODE OF CONDUCT

The Group’s disciplinary regime is adjusted to the employment legislation in each individual country. At company headquarters and at Thales’s French facilities, the disciplinary regime is governed by internal rules and regulations adopted after consultation with employee representative bodies.

Internal rules and regulations specify the general and permanent rules relating to discipline, and in particular the nature and scale of sanctions that the employer may apply. Any behaviour deemed by the employer to constitute misconduct may, depending on its nature and seriousness, be subject to one of a restrictive list of sanctions (warning, suspension, transfer, demotion or dismissal).

The Code of Conduct on Prevention of Corruption and Influence Peddling [2] stipulates that failure by an employee to comply with the provisions of the code, and more generally with applicable legislation, is liable to result in a disciplinary sanction, up to and including dismissal for misconduct.

2.8 MONITORING AND EVALUATION OF COMPLIANCE MEASURES

The Integrity and Compliance Committee has implemented an Anti-Corruption Management System, which is the subject of a dedicated instruction that defines the arrangements for monitoring and evaluation of anti-corruption compliance measures in accordance with the standard NF ISO 37001.

As part as a drive towards continuous improvement, this Anti-Corruption Management System defines the Anticorruption compliance program, points out the associated policies and instructions and sets out the indicators to monitor and assess performance of the program, as well as the associated controls.

The efficiency of the Anti-Corruption Management System is subject to a control by the Integrity and Compliance Committee at least once a year through dedicated management reviews that address the following key points of control:

- changes in the internal and external situation of the Thales group and its stakeholders;
- leadership and management commitment in support of the Anti-Corruption Management System;
- assessment of the risks of corruption and influence peddling associated with the Group's business activities;
- measurement of the attainment of the objectives of the Anti-Corruption Management System by means of tracking and performance indicators;
- identification and analysis of non-compliances with the Group's systems for detection and prevention of corruption and influence peddling, based on information supplied via various sources, such as internal alerts, feedbacks from the network of Chief Compliance Officers;
- measurement of the effectiveness of the Anti-Corruption Management System;
- Appropriateness of the human and equipment resources deployed to support the Group's actions in relation to the detection and prevention of corruption and influence peddling.
3. GOVERNANCE OF SYSTEM FOR PREVENTION OF CORRUPTION AND INFLUENCE PEDDLING

3.1 BOARD OF DIRECTORS

The Thales Board of Directors is very involved in the prevention of risks of corruption and influence peddling via two of its specialist committees (the Audit & accounts Committee, and the Strategic & Corporate Social Responsibility (CSR) Committee).

Every year, the Audit & accounts Committee reviews the Group risks map as well as the map of corruption and influence peddling risks. The Committee validates the internal audit plan presented by the Audit, Risks and Internal Control Department, which specifies, for the following year, the scheduled audits, namely in respect of the prevention of corruption and influence peddling, and validate the budget of this department. Every semester, this Committee also reviews the major and critical findings resulting from audits conducted by the Audit, Risks and Internal Control Department, which are still pending.

The Strategic & CSR Committee is involved in the program preventing corruption and influence peddling, namely through the Group's Non-Financial Performance Statement. In this context, it reviews the evolution of the risks of the Group's Non-Financial Performance Statement, of the Corporate responsibility policy and of the indicators from the Group's Non-Financial Performance Statement, including the compliance to rules related to business ethics, namely prevention of corruption and influence peddling.

3.2 GROUP EXECUTIVE COMMITTEE

The Thales group Executive Committee attaches the utmost importance to ensuring that the Group's business activities are conducted with absolute integrity and in compliance with regulations and internal procedures.

The Executive Committee gives its approval for the Group's organisation in relation to Integrity and Compliance, the Code of Conduct, as well as for the anticorruption compliance programme.

The Risks Management Committee validate every year the map of corruption and influence peddling risks and the related action plans and further ensures the follow up. This Committee, chaired by the President and Chief Executive Officer, is made up of the Vice President, Finance, the Vice President, Operations & Performance, the Group Secretary and General Counsel, as well as, for the meeting dedicated to corruption and influence peddling risk, of the Vice-President, International Development.

Each of the members of the Group Executive Committee makes a personal commitment to adopt a zero-tolerance approach to all acts of corruption and influence peddling, in accordance with the Code of Conduct on Prevention of Corruption and Influence Peddling.

The members of the Group Executive Committee also require their managers to make a personal written commitment – renewed at least every two years – to comply with the Group's Integrity and Compliance rules, including in particular those designed to combat the risks of corruption and influence peddling, and to communicate this commitment to all of their personnel.
3.3 THE GROUP SECRETARY

The Group Secretary, as guarantor of the legality and compliance and of the Group’s good governance, is tasked with promoting and developing a culture of ethics, integrity and compliance within the Group by preventing, detecting and remedying any compromising of the Group’s integrity and, more generally, any failure to comply with applicable laws and regulations.

The Group Secretary & General Counsel, member of the Group Executive Committee, has a direct link to the Chairman & CEO, to whom the Group Secretary & General Counsel reports.

To fulfil particularly the missions that are assigned to the Group Secretary in the field of Integrity and Compliance, it relies on the action of three of its departments (the Ethics, Integrity and Corporate Responsibility Department, the Legal & Contracts Department, and the Audit, Risks and Internal Control Department), working closely with other Group departments such as Human Resources and Finance.

The respective tasks of the three departments referred to above in the areas of detection and prevention of corruption are as follows:

- Development and updating of the anti-corruption compliance programme (the Ethics, Integrity and Corporate Responsibility Department);
- Introduction and implementation of the anti-corruption compliance programme within Group entities (the Legal & Contracts Department); and
- Development and updating of the corruption risk map, and monitoring of the implementation of the anti-corruption compliance programme by Group entities (the Audit, Risks and Internal Control Department).

The Group Secretary has set up an Integrity and Compliance Committee that has a pivotal place in the anticorruption measures within the Group (see section 3.3.1 below). The Integrity and Compliance Committee relies on a network of 120 Chief Compliance Officers and Compliance Officers (see section 3.3.2 below).

3.3.1 THE INTEGRITY AND COMPLIANCE COMMITTEE

The Integrity and Compliance Committee, chaired by the Group Secretary & Legal Counsel, is made up of the Heads of the Ethics, Integrity and Corporate Responsibility Department, the Legal & Contracts Department, and the Audit, Risks and Internal Control Department. The Integrity and Compliance Committee oversees the development, introduction, implementation, evaluation and updating of the Group Integrity and Compliance Programme.

The Integrity and Compliance Committee is aimed at:

- Defining the areas of focus and priorities of the Group's Integrity and Compliance policies;
- Approving the various components of the Group's Integrity and Compliance Programme, monitoring its implementation and evaluating its effectiveness;
- Approving dedicated organisations;
- Assessing the seriousness of internal alerts and allegations of non-compliance or compromising of the Integrity and Compliance, brought to its attention;
- Developing corrective action plans when necessary and monitoring their implementation.
The Integrity and Compliance Committee oversees the Group's Anti-Corruption Management System during dedicated management reviews, which are held at least once per year (see section 2.8 above).

The Group Secretary & General Counsel periodically reports on the Integrity and Compliance Committee's activities to the Executive Committee, the Risk Management Committee and the Board of Directors, in particular via the Audit & accounts Committee and the Strategic & Corporate Social Responsibility Committee.

3.3.2 THE NETWORK OF CHIEF COMPLIANCE OFFICERS AND COMPLIANCE OFFICERS

The Integrity and Compliance Committee relies on a network of 18 Chief Compliance Officers and 102 Compliance Officers. At the exception of the HR Chief Compliance Officer (appointed by the Vice President Human Resources in agreement with the Group Secretary and General Counsel), the Chief Compliance Officers hold management-level positions in the Legal & Contracts Department, and therefore report both to the Group SVP, Legal & Contracts and to their own respective VPs. Their principal missions are as follows:

- Monitoring compliance with applicable regulations and the Group's integrity and compliance procedures. To do so:
  - With support from the Ethics, Integrity and Corporate Responsibility Department, they monitor the introduction and implementation of the anti-corruption compliance programme and other programmes relating to integrity within their respective entities; and
  - With support from Compliance Experts and their dedicated networks, they monitor the introduction and implementation of other Group compliance programmes (trade compliance, antitrust and competition laws, personal data protection).

- Reporting to the Group SVP, Legal and Contracts and, when necessary, to the VP, Ethics, Integrity & Corporate Responsibility (or, as applicable, to the Compliance Expert) of any situations of non-compliance that require the definition of a corrective action plan by the Integrity and Compliance Committee;

- Serving as the designated points of contact for employees within their respective scopes of responsibility for any integrity and compliance questions.

Each of the Chief Compliance Officers appoints a network of Compliance Officers for their area of responsibility and proposes them to the Integrity and Compliance Committee to ensure a level of operational and geographical coverage that meets the requirements of the Group's Integrity and Compliance Programme.

This organisation also involves a total of 120 professionals in the rollout of the Group's Integrity and Compliance Programme. The Chief Compliance Officers regularly meet with the Heads of the Ethics, Integrity & Corporate Responsibility Department and of the Legal and Contracts Department, to discuss good practices, contribute to the continuous improvement of the anti-corruption compliance programme, and help improve the tools used, as well as the associated guides and procedures.

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1 Experts responsible for overseeing the following three areas of expertise: Trade compliance (export control and compliance with embargoes and economic sanctions), antitrust and competition laws, and personal data protection.
4. COMMUNICATION ON SYSTEMS

4.1 COMMUNICATIONS AIMED AT GROUP EMPLOYEES

As part of its employee awareness and information programme, Thales has developed – and periodically updates – various procedures, instructions and internal rules as part of the Group's Chorus 2.0 reference system, which will eventually cover all Group processes.

To raise awareness of the issues, and help employees understand the rules and requirements that they have to comply with, Thales maintains an Ethics, Integrity and Corporate Responsibility portal on the Group intranet, where all employees can view the latest news, learn more about Thales's policy, and download booklets, guides, tools and internal instructions. Employees can also use the portal to access the Group's internal alert system.

In addition to its actions aimed at raising awareness of developments in the area, the Ethics, Integrity and Corporate Responsibility Department emails a weekly press review to Chief Compliance Officers, to keep them informed of the latest news on a range of topics, including corruption issues.

4.2 COMMUNICATIONS AIMED AT ALL STAKEHOLDERS

Stakeholders are kept informed of Group initiatives, and of the main components of Thales's policy on prevention of corruption and influence peddling, via (i) information published in the Corporate Social Responsibility section of the Thales website (https://www.thalesgroup.com/en) (in particular in the Integrated Report), and (ii) the Universal Registration Document available on the website of the French financial markets authority (Autorité des marchés financiers, AMF) and in the Investors section of the Thales website (https://www.thalesgroup.com/en/investors).

5. GLOSSARY

**Anti-Corruption Management System**: elements put in place by the Thales group, in accordance with the standard NF ISO 37001, for the purpose of establishing and implementing policies and processes, and defining and achieving objectives, relating to the prevention of corruption and influence peddling.

**Community investment**: material or financial support, without any consideration in return for the Group or any of its employees (or with a consideration of minimal value, such as simply mentioning a donor's name in a publication), to a work or to a person to carry out charitable activities. Persons engaged in community investment activities expect no consideration in return for their support.

**Conflict of interest**: a situation in which a private interest of a Thales group employee may influence, or appear to influence, the employee's ability to perform his/her functions independently, impartially and objectively within the Group. This may be a personal, professional or financial interest of the employee concerned, or of a member of his/her entourage.
**Controlled entity:** a legal person or entity which Thales has the power and authority to manage, whether directly or indirectly, through the holding of shares with voting rights, via a contract or any other means, including the notion of control in accordance with article L233-3 of the French Commercial Code. In the case of joint ventures, this includes legal persons or entities in which Thales holds, directly or indirectly, 50% or more of voting rights, or more than 40% of voting rights, with no other partner having a larger holding (individually or in concert with other partners).

**Corruption:** any action whereby an individual in a public- or private-sector office solicits/proposes or accepts/yields to a donation, offer or promise with a view to performing, postponing or omitting to perform an action that falls, directly or indirectly, within the scope of their duties.

**Gift - Invitation:** a good, service or favour of any kind (for example, meals, gifts, entertainment, training, leisure activities, hotel stays, rentals, transportation, loans, etc.) given free of charge or below market value to its recipient.

**Influence peddling:** the unlawful soliciting or approval, at any time, whether directly or indirectly, by a person who is a holder of public authority, acts in a public service role, or holds a public elected office, of any offers, promises, donations, gifts or benefits, for themselves or for any other person, either in return for the performance of, or omission to perform, a duty carried out as part of their role, mission or mandate, or facilitated by their role, mission or mandate, or for the purpose of allowing their real or presumed influence to be used illegally with a view to obtaining awards, jobs, contracts or any other favourable decision from an authority or a public administration.

**Integrity and Compliance Programme:** programme designed to prevent risks in the following four areas:

- Corruption and influence peddling and related areas also involving integrity, such as fraud, conflicts of interest, insider trading, etc.
- Trade compliance (export control and compliance with embargoes and economic sanctions)
- Antitrust and competition laws
- Personal data protection.

**Membership:** a decision by a Thales group company to become a corporate member (or to renew membership) of a professional or industry association, whether directly or indirectly (via membership of one of its employees, or individual membership funded by a Group company).

**Non-compliance:** failure to comply with any of the requirements of the Group's Anti-Corruption Management System, reported via one of the information feedback channels that exist within the Thales group (for example, the network of Chief Compliance Officers, audit and monitoring activities carried out by the Audit, Risks and Internal Control Department or by the statutory auditors, the alert system, feedback from trainers, etc.).

**Politically Exposed Persons:** (i) natural persons who exercise or have been entrusted with prominent public functions, and (ii) their immediate family members or persons known to be their close associates. This includes, in particular, any person in the end-customer's country who holds, or has held within the last three years, a position in an executive, administrative, military or judicial government entity, whether appointed or elected, or any position in a political party in the end-customer's country, along with their close relatives and associates (and, by extension, any person who is widely and publicly known as having a close relationship with a person described in (i) above). This also includes any natural person exercising a prominent function in a national or international agency, organisation or institution (for example, the World Bank, EIB, EBRD, ASECNA, etc.) that may provide the end-customer with financial and/or technical support or participate in selecting one or more of the end-customer's suppliers.
**Public entity:** a legal person or entity entirely or predominantly State-owned and/or -controlled, whether directly or indirectly. Also covers any international public and/or financial entity, political organisation or public agency.

**Public official:** A public official includes any person holding a public and/or elected office included in the definition given in the OECD Convention (“any person holding a legislative, administrative or judicial office of a foreign country, whether appointed or elected; any person exercising a public function for a foreign country, including for a public agency or public enterprise; and any official or agent of a public international organisation”).

This includes, in particular, any person in the end-customer's country who holds, or has held within the last three years, a legislative, administrative, military or judicial office, whether appointed or elected; any person exercising a public function, including for a public entity; and any official or agent of a public international organisation.

**Sponsorship:** material or financial support to a non-charity person, organisation or event in order to promote a brand. The sponsor pays a sum of money or provides a good or service in exchange for direct publicity proportional to its investment.

**Thales group:** Thales and all companies which are directly or indirectly controlled by Thales.