

POLICY ON PREVENTION AND DETECTION OF ANTITRUST RISK

1. PURPOSE

Thales promotes and develops a culture of ethics, integrity, and compliance by ensuring strict compliance with the principles embedded in its Group Integrity and Compliance Program. As part of this initiative, Thales has established processes and rules within a comprehensive Antitrust Compliance Program (the “Program”) that aligns with legal requirements and recommendations from national and international competition authorities. This Program serves two purposes: fostering a culture of compliance with antitrust laws among Thales employees and allowing early identification of potential risks to detect and prevent their occurrence. The Executive Committee, supported by the Board of Directors, is fully devoted to promote this culture and applies a zero tolerance policy against any anticompetitive behavior.

2. SCOPE

Thales Antitrust Compliance Program covers all main aspects of antitrust laws, including restrictive agreements (e.g., market sharing, price fixing, etc.), abuses of dominant position, merger-control and foreign direct investment regulations, state aids, and other local legislation aimed at protecting fair competition. The Program applies to Thales SA, its wholly-owned subsidiaries and entities under its control and all employees within the Group (including contractors), regardless of their function, and in all countries where Thales operates.

3. THE 8 PILLARS OF THE GROUP ANTITRUST COMPLIANCE PROGRAM

The Antitrust Compliance Program is structured around 8 pillars that each contributes to its effectiveness:

1/ A DEDICATED ORGANISATION

The deployment of the Program is ensured by an organisation within the Legal & Contracts function, which includes a Group Antitrust Department at corporate level, together with a network of Antitrust Correspondents at business / country levels. Their respective roles and responsibilities are outlined in a dedicated instruction and are coordinated and supervised by the Group Integrity and Compliance Committee.

2/ ANTITRUST RISK MAPPING

Thales conducts risk mapping exercises to manage operational, strategic, governance, compliance, and financial risks. To better assess its exposure and manage its risks related to antitrust laws, an Antitrust Risk Mapping focusing on the most significant risks for the Group is conducted at the Business Line (“BL”) level every three years (or more frequently if the evolution of the business justifies it). With inputs coming from BL management, the (Chief) Compliance Officer (CO / CCO), and the Antitrust Correspondent, a BL Antitrust Risk Profile is established for each BL of the Group, measuring its gross and net exposure (after implementation of mitigation measures) to antitrust risks and identifying the countries in which the BL operates which are the most exposed to antitrust risks. Based on these findings, a tailored action plan is defined and deployed under the responsibility of the Antitrust Correspondents supervising the BL and the concerned countries.

3/ TOP MANAGEMENT INVOLVEMENT AND CASCADING

Members of the Executive Committee, as well as Group managers, personally commit to maintain a zero-tolerance policy towards anticompetitive behaviors and promote the Antitrust Compliance Program throughout the Group by cascading it to their respective teams. The Integrity and Compliance Committee oversees the Program's development and implementation, with support from the Compliance organisation and the Group Antitrust Department.

4/ ANTITRUST GUIDES AND TOOLS

A large number of practical guides and tools are available to promote Antitrust compliance addressing recurring situations faced by employees in their daily business and raising their awareness of potential antitrust risks and prohibited behaviors. They are made available to all employees of Thales either through the Group referential or the intranet. In addition to the general resources for business populations, more specialized tools, including guides, checklists, case-studies, etc., are made available to the Antitrust Compliance network to support them in dealing with the matters that are brought to their attention.

5/ TRAINING ON ANTITRUST RISK

Trainings are an essential aspect of the Program, including both online modules (webinars, e-learning, rich media, etc.) and face-to-face sessions. The trainings cover various risk scenarios and target different professional families depending on their exposures to antitrust risks. Training kits are typically prepared by the Group Antitrust Department and adapted / customized by the Antitrust Correspondents for their needs.

6/ GROUP INTERNAL ALERT SYSTEM

Thales has set up a "Thales Alert Lines" alert platform to report any conduct or situation that does not comply with the Group's internal rules or with applicable laws and regulations, including antitrust laws. The Alert Lines is accessible not only to the Group employees but to third parties as well.

Thales undertakes not to sanction, dismiss or discriminate against any Group employee due to a report made in good faith and relating to facts falling within the scope of the alert system.

Further information can be found on this page: ["Thales Alert Lines" platform | Thales Group](#)

7/ DISCIPLINARY SANCTION IN CASE OF BREACH

Failure by an employee to adhere to applicable laws or to internal procedures may result in disciplinary action.

Thales adjusts its disciplinary regime according to the employment legislation in each country where it operates. Internal rules and regulations define the nature and severity of sanctions, such as warnings, suspensions, transfers, demotions, or dismissals, for behaviors considered misconducts.

8/ MONITORING AND EVALUATION OF COMPLIANCE MEASURES

Thales is committed to the continuous improvement of its Antitrust Compliance Program, which is reviewed periodically by the Integrity and Compliance Committee. The review includes discussions on the activity of the Antitrust Compliance organisation, evolution of the Group activities requiring some adaptations of the Program, strengths of the Program as well as areas for potential improvements. The Audit, Risks, and Internal Control Department also conducts internal control audits, which may cover Antitrust Risk. External audits and investigations can also be conducted when necessary.