



# ANTI-CORRUPTION CODE

# FOREWORD

*"As prominent player in the global civil and military aeronautic sector, Dassault Aviation operates with integrity, fairness and probity, in full compliance with the applicable legislation in the countries in which it does business.*

*This revised Anti-Corruption Code has been updated from the previous 2017 version to incorporate the very latest standards in terms of Responsible Business Conduct.*

*Dassault Aviation is committed to a zero-tolerance policy in this area, as well as to strict business ethics in the conduct of its activities.*

*This updated Anti-Corruption Code is addressed not only to Dassault Aviation's employees, but also to our customers, partners and suppliers, who expect us to set an example.*

*The Code, which sets out the Company's procedures for preventing breaches of ethics, identifies high-risk situations along with the associated mitigation measures to be taken, and is designed to be a source of practical guidance.*

*By remaining vigilant and applying this approach on a daily basis, we will ensure the continued good reputation and legal compliance of Dassault Aviation.*

*I would like to thank you all for your unwavering dedication."*

17 January 2024

Éric Trappier  
Chairman and Chief  
Executive Officer of Dassault  
Aviation



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*This code of conduct (the «Anti-Corruption Code»), designed to prevent breaches of business ethics, applies to all Dassault Aviation's employees, who are responsible for familiarizing themselves with its contents and complying with its requirements.*

*The regulations set out in this Code are applicable wherever Dassault Aviation does business, including overseas, regardless of applicable national and international legislation.*

*Designed as a reference document, this Anti-Corruption Code is intended not merely to explain why the prevention of corruption and influence peddling is of vital importance, but also to provide guidelines on how employees should conduct themselves in certain situations they may encounter.*



*Emmanuel Dupic  
Executive Vice President,  
Ethics and Compliance*

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## 1 - ANTI-CORRUPTION PROCEDURES AND BREACHES OF BUSINESS ETHICS

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# ANTI-CORRUPTION COMPLIANCE SYSTEM

The Ethics and Compliance Department, an independent department reporting to the CEO, is in charge of implementing the Group's anti-corruption policy.



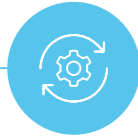
## Strong leadership from the Board of Directors, with an anti-corruption code and a dedicated enforcement body.

- Implementation of policies to prevent, detect and address cases of corruption
- Monitoring of effective compliance with the relevant French legislation (the so-called "Sapin 2" law), with
- Adoption of an anti-corruption code that sets out the importance of preventing breaches of business ethics and illustrates the types of behavior to be avoided using concrete examples.



## Mapping corruption and influence peddling risks

- Creation of a single, comprehensive chart containing a breakdown of Dassault Aviation's ethical compliance risks by business activity. This risk chart is validated by the company's Board of Directors.
- Identification and ranking of operational risks for each major business function as well as by business activity and geographical region.



## Due diligence procedures

- Procedures for assessing compliance among the Company's customers, partners and tier-1 suppliers.
- Targeted due diligence based on the company's corruption and influence peddling risk mapping, carried out by dedicated committees.



## Employee training

- Training sessions tailored to the needs of each employee.
- Raising the awareness of those employees most exposed to the risks of corruption and influence peddling to equip them with the requisite techniques to guard against such risks.



## Internal alert system

- Internal alert system enabling Company employees to report any breaches of the Code they may witness, via a hotline and dedicated messaging system.
- The system has been extended to all types of offenses, in accordance with French and European whistleblower protection legislation, and it is designed to ensure the strict confidentiality of the data collected.



## Internal monitoring and assessment

- Level 2 and 3 monitoring procedures conducted by the Ethics and Compliance Department and the Internal Audit and Risk Management Department, respectively.
- Establishment of an annual audit program.
- Information to departments regarding issues requiring particular vigilance in terms of level 1 operational monitoring.

# WHAT IS CORRUPTION AND INFLUENCE PEDDLING??

**Corruption and influence peddling may take various forms: active or passive, direct or indirect, relating to a public official or a private individual; national or international.<sup>1</sup>**

Most legal systems impose punishments for corruption and influence peddling in the private sector (between the employee of a company and a client of said company) in the same way as they do the corruption of public officials (between the employee of a company and a member of a state authority for example).

Under French law, corruption and influence peddling are criminal offences which are prosecuted regardless of the status or nationality of the protagonist (i.e., domestic, international or foreign public officials; domestic or foreign private individuals), whether the offenses are committed in France or in foreign territory.

The mere act of offering or soliciting a form of gain of any kind is sufficient to characterize the offense of corruption or influence peddling.

Corruption is defined as the act of promising, offering or granting, soliciting or accepting, directly or indirectly, any benefit whatsoever with a view to carrying out or not carrying out, directly or indirectly, an act within the scope of that person's functions.

## **CORRUPTION THUS INVOLVES TWO PARTIES:**

- the person who solicits or accepts a benefit in exchange for refraining from, performing or enabling the performance of an action connected with his or her position (the corrupted party);
- the person who promises, offers or grants the inducement (the corrupting party).

Influence peddling is defined as the act of offering, promising or granting, soliciting or accepting, any benefit whatsoever, whether directly or indirectly, with a view to abusing one's real or perceived influence in order to obtain awards, employment, contracts or any other advantageous outcome from a public authority or body.

## **INFLUENCE PEDDLING THUS INVOLVES THREE PARTIES:**

- the person who offers or agrees to abuse his or her real or supposed influence vis-à-vis a decision-maker;
- a decision-maker;
- the beneficiary of the decision taken by the decision-maker.



<sup>1</sup> The definitions given above are consistent with French criminal law (articles 432-10 et seq. of the French penal code).

# HOW TO IDENTIFY A POLITICALLY EXPOSED PERSON AND A PUBLIC OFFICIAL



## HOW TO IDENTIFY A POLITICALLY EXPOSED PERSON (PEP)

A politically exposed person is any individual who performs, or has performed, political, legal or administrative duties on behalf of a State or an international organization.

The term PEP also covers direct members of the PEP's family, as well as close relations with whom the PEP has strong professional or personal ties.

In particular, the following are considered to be politically exposed persons:

- ministers;
- senior civil servants;
- senior magistrates;
- children of a minister or any other senior official.

## HOW TO IDENTIFY A PUBLIC OFFICIAL

A public official is any individual:

- holding a public elective office;
- or
- entrusted with a public service mission;
- or
- a representative of any public body.

Examples include military personnel, ministers, civil servants, customs officers, judges, public prosecutors, notaries, etc.

While a PEP or public official's involvement in business dealings is not prohibited, their position, influence or status means that special vigilance must be exercised.



## HIGH-RISK SITUATIONS

- The person you are dealing with does not specify his or her position or duties.
- The person you are dealing with refers to a law or local custom in order to predicate the performance of a particular task on the payment of a sum of money (tax, fine, etc.) or the granting.
- The person you are dealing with solicits a benefit of some kind in the course of an official authorization procedure (application for a license, permit, certification, etc.).
- The person you are dealing with solicits payment or a benefit of any kind to carry out a task that falls within the scope of his or her duties.



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## PROFESSIONAL HOSPITALITIES: INVITATIONS AND GIFTS

### WHAT IS PROHIBITED

- Offering or accepting sums of money in cash or any equivalent form (gift vouchers, discounts, etc.).
- Offering gifts and invitations to an individual in a decision-making position with regard to a call for tender (or, conversely, accepting such emoluments from a bidder in such a process).
- Offering or accepting any gift, invitation or benefit of any kind with the aim of deriving an unfair advantage.
- Offering or accepting any gift or invitation contrary to the laws of the country or procedures of the recipient's organization.

### WHAT TO DO

- Consult the Gifts and Invitations policy document, which sets out the Company's stance.
  - Before accepting or offering a gift, make sure it meets the requirements for transparency and proportionality.
- Exercise discernment and caution when making decisions. More specifically, you should ask yourself the following questions: Could I discuss this gift with my colleagues without feeling embarrassed?
- Would my immediate superior approve of me receiving or offering this gift?
  - Might this gift influence my decision as to whether to work with this supplier, or on the recipient's decision-making process, in the case of a customer?

Professional hospitalities such as gifts or invitations, whether received or extended, are expressions of goodwill that are common in business relationships. They can take various forms: meals, trips, invitations to professional, sporting, cultural, artistic or other events.

However, under most national laws, such hospitalities may constitute forms of corruption or influence peddling.

To avoid any risk of corruption or influence peddling, gifts and invitations must comply with the following conditions:

- they are given without anything being expected in return. Gifts and invitations must not be intended to confer or obtain undue advantage, or to influence a decision;
- they are given in professional context;
- they must be **reasonable** and **proportionate** in terms of their value and frequency;
- they have been provided **and received in transparency**, and properly **registered**.



#### EXAMPLE

*While on vacation, you meet one of your suppliers, with whom you are currently involved as part of a call for tenders issued by your company. He invites you to dinner and, in the course of the meal, suggests that you might like to come with him the following day to attend a Formula 1 motor race.*

#### WHAT ARE THE RISKS FOR OUR COMPANY?

This could potentially qualify as a form of corruption. Such an offer, extended outside of a normal business setting, is disproportionate. Moreover, this courtesy could be viewed as a means of obtaining a favor from you in connection with the call for tenders. To accept it would be a violation of Dassault Aviation's values and interests.



## CONFLICTS OF INTEREST

### WHAT IS PROHIBITED

- Any action, decision or contribution to a decision by an employee designed to promote his/her own interests to the detriment of those of Dassault Aviation.
- Putting oneself in a situation where there is a conflict of interest, such as:
  - approving a bid from company in which a relative has a decision-making role in connection with the contract;
  - participating in work or projects that are in competition with Dassault Aviation's activities.
- Failing to declare a conflict of interest to one's superiors.

### WHAT TO DO

- Identify any situations of conflict of interest that you find yourself in – or are likely to find yourself in – and report them so that appropriate action can be taken.
- Inform your superiors or the Ethics and Compliance Department if you are affected by a personal interest that could potentially compromise your ability to perform your duties impartially, neutrally and fairly.

A conflict of interest is a situation in which a person has **personal interests that may influence** his or her ability to perform his or her duties within the Company impartially and independently.

Such a conflict arises when an employee's personal interests are in contradiction with those of Dassault Aviation. Such conflicts may be professional, personal, financial or political in nature.

Conflicts of interest are not illegal when they are disclosed and addressed by the Company. Otherwise, they can result in impropriety, and even in corruption or influence peddling.



#### EXAMPLE

*Your spouse runs a company that specializes in the sale of office supplies. This company responds to a call for tenders issued by your company's purchasing department. Your spouse asks you to assist him or her in his or her bid.*

#### WHAT ARE THE RISKS FOR OUR COMPANY?

This is a conflict of interest. Your spouse of course has the right to submit a bid. But you may not participate in any way whatsoever in Dassault Aviation's tender process, nor may you endorse his or her company's bid. To accept it would be a violation of Dassault Aviation's values and interests.



## SUPPLY CHAIN: SUPPLIER AND SUBCONTRACTOR SELECTION

### WHAT IS PROHIBITED

- Selecting a supplier without going through a formal tendering process in exchange for an undue benefit.
- Agreeing to pay a supplier for fictitious or overvalued services in return for an undue benefit.
- Giving a supplier preferential treatment over its competitors in a call for tenders in exchange for an undue benefit.
- Being forced to use a supplier in exchange for an undue benefit.

### WHAT TO DO

- Registration of all procurement activities so that they can be subjected to the Company's supplier approval process, with a view to carrying out mandatory due diligence.
- Inform your superiors and the Ethics and Compliance Department of any changes in the circumstances of an approved or registered supplier that might have a bearing on how the company's status is assessed.

Dassault Aviation works with a robust network of suppliers and subcontractors across its value chain, all of whom contribute to the Company's success.

Dassault Aviation conducts a due diligence process before entering into a business relationship with a supplier or subcontractor. This process ensures that suppliers and subcontractors adhere to ethical standards in their dealings with Dassault Aviation.

Failure to comply with the approval process set out by the Company could expose it to the risk of corruption or influence peddling.



#### EXAMPLE

*The project manager at a construction company offers to refurbish your deck if you agree to sign a contract with his or her company, without going through the Purchasing Department's due diligence process.*

#### WHAT ARE THE RISKS FOR OUR COMPANY?

This is a form of corruption. This company may eventually become one of the Company's suppliers, but must first be vetted by the Purchasing Department. To accept it would be a violation of Dassault Aviation's values and interests.



## PHILANTHROPY AND SPONSORSHIP

### WHAT IS PROHIBITED

- All types of philanthropic giving or sponsorship that do not comply with the Company's communication strategy and, more generally, with its values and priorities.
- Any philanthropic giving or sponsorship involving undisclosed quid pro quos.
- Any philanthropic giving or sponsorship that does not comply with current legislation in the countries concerned.
- All funding for political parties, elected representatives or candidates.

### WHAT TO DO

- Consult the procedures relating to philanthropy, sponsorship and donations.
- Declare in advance any links between the beneficiary of such philanthropic giving or sponsorship and an employee that may constitute a conflict of interest.
- Exercise particular vigilance with regard to any activity carried out for, or in partnership with, a foundation or association.
- Bear in mind that such activities need to remain exceptional, restricted to special cases.

**Philanthropy** consists in providing material, financial or human resources to a charity or community organization, without seeking any form of benefit in return.

Unlike philanthropy, **sponsorship** is designed to promote and enhance the sponsor's corporate image for commercial purposes. The company seeks to obtain publicity commensurate with its investment; in other words, to reap a direct benefit.



#### EXAMPLE

Your supplier offers to sponsor the association in which you are a senior figure, in return for the renewal of an existing contract with Dassault Aviation, which you are currently involved in renegotiating.

#### WHAT ARE THE RISKS FOR OUR COMPANY?

This is a breach of business ethics, since the sponsorship of the association is conditional on the renewal of the contract, and thus constitutes an undue benefit. To accept it would be a violation of Dassault Aviation's values and interests.



## FACILITATION PAYMENTS

### CE QUI EST INTERDIT

- Any form of facilitation payment, regardless of the amount involved and irrespective of local customs.
- Cash payments are prohibited by Dassault Aviation.

### CE QU'IL FAUT FAIRE

- If you are asked to make a facilitation payment, you must:
  - refuse to do so;
  - immediately inform your superior or the Ethics and Compliance Department.

These payments are used to facilitate or expedite the execution of routine administrative procedures or formalities carried out by public officials. Facilitation payments include all improper payments made in exchange for a routine task or to speed up a bureaucratic procedure. In addition to cash payments, other considerations of significant value, such as trips, tuition fees, donations to charitable organizations as well as other benefits of various kinds, are considered to be facilitation payments or bribes.

Although certain countries are somewhat tolerant of this practice, facilitation payments, including bribes, are considered to be a form of corruption in most countries and are thus strictly prohibited by Dassault Aviation.



#### EXAMPLE

*I have to hold a meeting overseas at very short notice and I urgently need a visa. The embassy employee informs me that the visa process can be fast-tracked if I agree to pay a certain amount of money.*

#### WHAT ARE THE RISKS FOR OUR COMPANY?

The payment requested by the employee may constitute a form of corruption. To accept it would be a violation of Dassault Aviation's values and interests.



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## ALERT SYSTEM

As required by the French law of March 21, 2022 no. 2022-4012, Dassault Aviation has set up an internal alert system to deal with reports of any situation or behavior that may contravene the Anti-Corruption Code, any of the Company's policies and/or procedures, or any legal or regulatory provision (Non-Compliant Situations). The internal alert system complies with articles 6 and 17 of the so-called «Sapin 2» law. It also complies with the latest legislation in force, such as the law that incorporates European Directive 2019/1937 into French law (Law no. 2022-401).

This unified process is designed to ensure the **confidential and impartial** handling of alerts concerning Non-Compliant Situations, and to protect any person who has made a **genuine allegation in good faith** from any direct or indirect disciplinary or other discriminatory action, as well as from dismissal, whether they be employed directly or indirectly by the Company. The information collected as part of the procedure complies with the guidelines of the French National Committee for Data Privacy and Civil Liberties (CNIL).

Any non-compliant situation can be reported via the following e-mail address:

[procedure-alerte@dassault-aviation.com](mailto:procedure-alerte@dassault-aviation.com)



## DISCIPLINARY MEASURES

Dassault Aviation is committed to a policy of zero tolerance with regard to corruption and influence peddling.

To ensure the promotion of DASSAULT AVIAITON's culture of integrity and probity, it is everyone's responsibility to familiarize themselves with this Anti-Corruption Code and all associated procedures, and to consult them on a regular basis.

Alongside the Code of Ethics, this Code reflects the culture of compliance that is firmly established within the Company. Violation of this Code, and of Company policy in general, may result in disciplinary action up to and including dismissal for serious or gross misconduct, and may also give rise to criminal or civil proceedings.

For instance, potential sanctions include the following:

**As regards employees:** criminal convictions, including imprisonment, fines and/or disciplinary measures, where applicable.

**As regards Dassault Aviation:** criminal convictions, including significant fines, public exposure, bans on bidding for public contracts, an inability to raise funds, and damage to Dassault Aviation's reputation and image.

To learn more, the relevant documentation can be consulted on the DEC (Ethics and Compliance Department) Deltanet portal, as well as on the [dassault-aviation.com](http://dassault-aviation.com) website.

Maintaining our culture of Compliance is the responsibility of all our employees and stakeholders.





Photos

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