



# ANTICORRUPTION CODE OF CONDUCT

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## FOREWORD

The purpose of this Anticorruption Code of conduct is to guide the conduct of the company's activities in the fight against corruption and influence peddling.

In line with the risks identified in this area, it describes the behaviors to be avoided and those expected of all group employees. To make it easier to read, it is illustrated by concrete cases.

The rules set out are binding for the entire group, both in France and abroad, where they are combined with applicable local law or international legislation that all employees are required to comply with.

They must be known and applied by everyone, and everyone must set an example. Any breach of these rules may result in disciplinary action.

If in doubt about which rules to apply, it is everyone's responsibility to seek advice from the group Compliance department.

It is part of the relationship of trust that the group maintains with each of its stakeholders. This is why it is communicated to them, and is public, and why we expect them to respect these same principles.

This code also presents Naval Group's secure whistleblowing system, and the protection afforded to whistleblowers.

This code meets the requirements of the Sapin II Law on "transparency, the fight against corruption and the modernization of economic life" and the ISO 37001 standard for which Naval Group is certified.

It is appended to the internal regulations (or equivalent) of each site in France and each subsidiary.



# ANTICORRUPTION POLICY

MESSAGE FROM THE CHAIRMAN & CEO

PIERRE ÉRIC POMMELLET

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“ **Zero tolerance for corruption and influence peddling.** ”

Naval Group applies a zero-tolerance principle with regards to corruption and influence peddling.

In accordance with the requirements of the French “Sapin II” Law and the provisions of foreign conventions and laws applicable to its business, Naval Group implements a program aimed at preventing and detecting any act of corruption or influence peddling.

Naval Group is deploying an anticorruption management system that is ISO 37001 certified since April 19th 2021 and is committed to its continuous improvement.

Naval Group's anticorruption and influence peddling program is based on the following pillars:

1. the commitment of its governing bodies which, with the support of an independent Compliance department, promotes a culture of integrity, adopts exemplary behavior and implements the necessary resources to secure the effectiveness of the program;
2. a corruption and influence peddling risk map, cornerstone of the program, on the basis on which the company's prevention and detection measures are defined. It includes an in-depth analysis of the company's internal processes, business activities, as well as of its geographical facilities;
3. risk management approach structured as follows:
  - the publication and distribution of a Compliance Code of conduct and its related procedures, which define the rules applicable to all company employees. Any breach may justify the application of a disciplinary sanction;
  - awareness-raising campaigns for all employees, as a medium of the company's culture of integrity, and specific training sessions targeted for the most exposed personnel;
  - a third-party assessment policy - whether customers, suppliers, subcontractors, business partners - resting on a dedicated risk map, which includes preventive measures, proportionate to the risks identified;
  - a secured whistleblowing management system, accessible both to employees and third parties, enabling the collection and managing, in a complete confidential manner, of any report with regards to situations that would be contrary to our rules. Naval Group guarantees the protection of the whistleblowers and undertakes not to issue any sanctions or reprisal against a person who has made a report in good faith and according to the procedures provided by the company;
  - a three-level internal control system, aimed notably at assessing compliance with the company anticorruption measures and procedures, at detecting any breaches and at defining appropriate corrective measures.

I personally request from each Naval Group employee to stand by my side and promote this program and its measures, which ensure the company's integrity as well as its commitment to fight corruption.

Pierre Éric Pommellet  
CEO



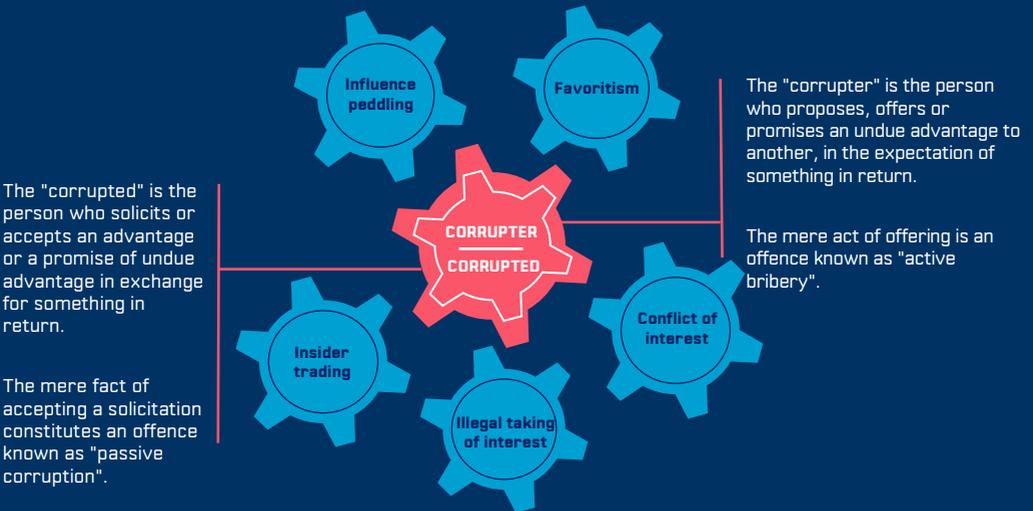


# DEFINITIONS

## 1/ WHAT IS CORRUPTION ?

Corruption refers to behavior whereby offers, promises, gifts or donations are proposed, solicited, accepted or received, for the purpose of withholding or performing an act, or obtaining favors or special advantages. (cf. French Anticorruption Agency glossary).

### THE MACHINERY OF CORRUPTION



Corruption is an offence punishable under the French Criminal Code, which applies equally to people working in the private sector, to French or foreign public officials and to public officials, including elected representatives.

## 2/ WHAT IS INFLUENCE PEDDLING ?

Influence peddling consists in promising someone something, not so that he/she performs acts that are part of or facilitated by his/her function, but so that he/she uses his/her influence with a third party to obtain a favorable decision or opinion, whether this influence is real or supposed. (Cf. French Anticorruption Agency glossary).

Influence peddling is also an offence under the Penal Code. It is more severely punished when committed by a person holding a public office.

## 3/ WHAT IS A CONFLICT OF INTEREST?

A conflict of interest is a situation in which a person's professional, financial, family, political or personal interests may interfere with their judgment as part of their duties within the company to which they owe a duty of loyalty. (Cf. ISO 37001 norm). It can be:

- **real**
  - when the interested party has a proven personal interest
- **potential**
  - when the person concerned has personal interests which are not sufficiently significant at the time the question of conflict arises or in cases where there is not yet any relationship between his duties and his private interests

# 1

## INTERACTION WITH THIRD PARTIES BUSINESS RELATIONSHIPS

### CONTEXT AND STAKES

The establishment of a business relationship between Naval Group and an external stakeholder (hereinafter also referred to as a "Third Party\*") may expose the company and/or its employees to a risk of corruption or influence peddling.

The company assesses the risk of corruption and influence peddling by carrying out appropriate "Due diligence\*" compliance checks before entering into a business relationship and during the term of contracts or agreements.

This risk varies greatly depending on the country, the type of Third Party and the project envisaged. It concerns all processes that bring the company into contact with external stakeholders, **particularly in the fields of purchasing, trade, partnerships and mergers & acquisitions.**

These assessments cover both the project and the Third Party itself: shareholding structure, ultimate beneficiaries, bank account domiciliation, sanctions or legal proceedings, etc.

### THE RULE

**Any business relationship with a Third Party must be subject to compliance "due diligence", which is a series of checks.**

These are more or less thorough, depending on the nature of the contract or agreement and the type of Third Party involved (private customer, subcontractor, supplier, industrial or commercial partner, academic or scientific partner, etc.).

On completion of these checks, the company Compliance department formalizes its conclusions by issuing a "compliance risk assessment" regarding the level of risk, which can be assessed as: low, medium or high. These last two levels should alert the project owner to the risks incurred by the company if the relationship with the Third Party were to be pursued as it stands.

To reduce the level of risk identified, mitigation actions must be implemented under the responsibility of the project owner, which may go as far as terminating the business relationship with the Third Party concerned.

In the specific case of business advisors\*, the dedicated instruction (000254927) must be strictly complied with by the people concerned.

**Some examples of red flags:**

- one of the ultimate beneficiaries is a politically exposed person (PEP);
- the Third Party or one of its ultimate beneficiaries is on sanctions or exclusions lists;
- the Third Party or one of its ultimate beneficiaries has already been convicted of a criminal offence;
- the contract does not include an anticorruption clause;
- the information provided are incomplete.

(\* ) defined in the glossary on page 23

## THE RIGHT REFLEXES

### 1 Ask yourself the right questions

- Is the Third Party a public servant or a public official?
- Has the Third Party been assessed by the company Compliance department?
- What is the result of the assessment?
- Are remedial actions recommended? Have they already been implemented?
- Could a bona fide Third Party challenge the legitimacy of this business relationship?

### 2 Adopt the right behaviors

- I strictly respect to the company's processes, in particular those relating to purchasing, trade, and industrial and commercial partnerships.
- Prior to any business relationship with a Third Party, I ask the company Compliance department to carry out a due diligence on this Third Party, providing **at least the name and full address of the Third Party, a description of the project and the amount involved.**
- **I will not sign any contract binding the company without prior assessment of the Third Party by the company Compliance department.**

## PRACTICAL CASE

"We want to work quickly with a new supplier who will enable us to meet the already tight schedule. We want to sign a contract immediately, given the imperatives of the project."

I remind my colleagues their obligation to respect the Purchasing department's process and its various stages, in particular the need to obtain prior compliance due diligence.

"I want to work with a supplier recommended to me but the compliance risk assessment shows that the ultimate beneficiary is very close to the government of the client country."

I implement the mitigation actions recommended by the company Compliance department. If the level of risk cannot be reduced or if it is not possible to apply these recommendations, I consider working with another supplier and inform the Compliance department of this new situation.



FOR FURTHER INFORMATION,

refer to the **anticorruption manual** in the BMS (000251967) or contact your Compliance Officer.



## PUBLIC SERVANT AND PUBLIC OFFICIALS ENTERING AND MONITORING THE RELATIONSHIP

### CONTEXT AND STAKES

As a result of its activities in France and abroad, Naval Group is in regular contact with Public officials\* and Public servants\* (particularly elected representatives), some of whom qualify as "Politically exposed persons\*" (PEP).

Passive or active bribery of these people is subject to specific laws and is strongly repressed by international conventions and by the various laws of the countries in which Naval Group operates.

One of the most common examples of corruption is the "facilitation payment" (commonly known as "baksheesh"). It refers to an illegal or unofficial payment of a sum in return for services that the payer would have been legally entitled to receive without such a payment.

It is generally a relatively small sum paid to a public official to ensure or accelerate the completion of a routine procedure or administrative action.

### THE RULE

- 1. It is forbidden to offer or grant an advantage, directly or indirectly, to a public servant or public official:**
  - in return for a favorable decision for Naval Group

or

  - to use his real or supposed influence to obtain a favorable decision for Naval Group

**This benefit can take many forms, such as:**

- a promise to hire a relative;
- a payment of a health benefit;
- a payment for training;
- a payment of expenses to attend an exhibition;
- a payment for home repairs.

(\*) term defined in the glossary p.23

- 2. Facilitation payments are prohibited, that is why:**
  - if an administrative payment is requested, proof of the legitimacy of the payment and an official receipt must be obtained;
  - if no satisfactory proof can be obtained, the payment should be refused;
  - if, in the event of an imminent threat to health, safety or freedom, the payment is nevertheless made, the person concerned must document the event and report it as soon as possible to his or her line manager (declaration on honor co-signed with N+1 and N+2) and to the Compliance Officer of the entity concerned.

## THE RIGHT REFLEXES

### 1 Ask yourself the right questions

- What is the status of our contact (Public servant, Public official or PEP)?
- What is our contact's position in the decision-making chain?
- What were the circumstances of the meeting (who instigated it, what was the context, etc.)?
- Is the proposal received contrary to the rules laid down by Naval Group?
- Could acceptance of the proposal received cause financial or reputational damage to the Group?

### 2 Adopt the right behaviors

- I am always vigilant when dealing with Public officials or Public servants, as my behavior or my words could be misinterpreted.
- I check the status of our contact, possibly asking the Compliance department to carry out a due diligence and issue a compliance risk assessment.
- I check that there are no PEPs within our contact's structure likely to be involved in influence peddling in matters concerning Naval Group.
- I am not seeking to facilitate an administrative procedure by means of a facilitation payment.

## PRACTICAL CASE

"A high-ranking public decision-maker tells me that his intervention could benefit Naval Group, if the company pays his son's school fees."

This type of behavior is forbidden by Naval Group. I refuse this proposal and inform my manager and the company Compliance department.  
I remind the decision-maker that Naval Group applies a zero-tolerance policy in this situation.

"At a customs post in a foreign country, a Public servant tells me that paying a certain amount would speed up the procedure."

I refuse the request, trying to maintain a cordial relationship with the Public servant, and I tell him that French law forbids the use of such practices.  
I seek support from those around me or contact my manager as soon as possible and defer to his decision.



**FOR FURTHER INFORMATION,**  
refer to the **anticorruption manual** in the BMS (000251967) or  
contact your Compliance Officer



## 3 CONFLICT OF INTEREST IDENTIFICATION, TREATMENT AND PREVENTION

### CONTEXT AND STAKES

A conflict of interest does not in itself constitute an offence under the French penal code. However, it may characterize some of the elements constituting criminal offences likely to damage the company and cast doubt on the impartiality of decisions previously taken by an employee.

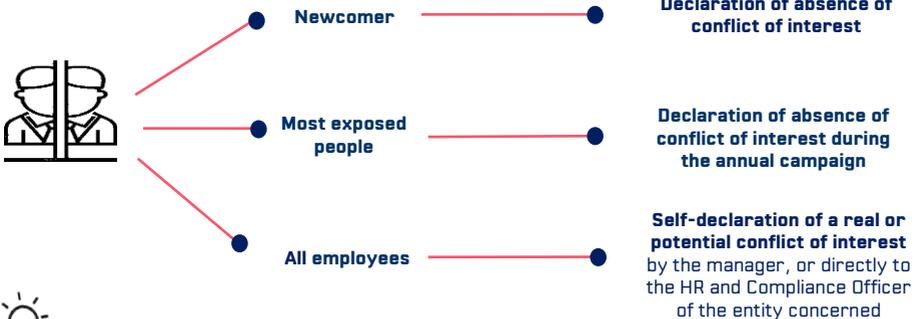
In all cases, employees are expected to be loyal to the company, to act in its best interests and to use the company's resources and assets exclusively for its benefit.

Any group employee is likely to find himself/herself in a position of conflict of interest at some point. Nevertheless, the probability and impact of such a situation for the company depend mainly on the position held by the person concerned and his/her field of activity.

We must all be vigilant in such situations. When they are identified at an early stage, appropriate measures can be taken, with due respect for each individual and his/her team, such as reinforcing the collegiality and transparency of decision-making, the independence of functions, the separation of powers and the tightening of controls.

### THE RULE

**All employees are required to declare any real or potential conflict of interest as follows:**



- Nota 1:** these rules are adapted for subsidiaries (cf. the Compliance Officer of the subsidiary concerned).
- Nota 2:** the conflict of interest declaration form is available in the BMS (**000254578**).
- Nota 3:** the declaration of absence of conflict of interest form is available in the BMS (**000256902**).

## THE RIGHT REFLEXES

### 1 Ask yourself the right questions

- Could this situation affect my impartiality in the performance of my duties?
- Would my loyalty and impartiality, or their perception, be called into question if my colleagues, or an external stakeholder, were aware of this situation?
- How would my line manager react if he/she knew about this situation?
- Could the revelation of this situation by the media or social networks damage Naval Group's reputation?
- Are my other activities (second job, etc.) compatible with my duties at Naval Group? Shouldn't I talk to my manager about this? Do I need to fill in a conflict of interest declaration?

### 2 Adopt the right behaviors

- I declare any actual or potential conflict of interest as far upstream as possible, via the management line.
- In case of doubt, I seek the advice of my manager, the local Compliance Officer and/or, if necessary, the company Compliance department.

### 3 Possible measures

- Depending on the situation, and in accordance with employment law, the following measures may be taken with regard to the employee concerned:
  - ask the employee to withdraw from the situation in question;
  - restrict delegations, participation in certain meetings and access to certain information;
  - modify the scope of his or her function;
  - provide for additional validation and controls.

## PRACTICAL CASE

"I am a prescriber and I am involved in preparing a consultation for a contract. The list of companies consulted includes the company where my cousin works as sales manager."

I inform my manager of this potential conflict of interest, complete the conflict of interest declaration and propose to withdraw from the situation.

"I am creating a need for an internship at Naval Group to enable a friend's son to complete his end-of-study internship."

This type of behavior is forbidden by Naval Group. In this situation, I tell my friend that his son can consult and apply for the internships available on the careers section of the company's website.



**FOR FURTHER INFORMATION,**  
refer to the **anticorruption manual** in the BMS (000251967) or contact your Compliance Officer.

# 4

## SPONSORING/PATRONAGE PARTNERSHIP/MEMBERSHIP SUPERVISION AND AUTHORIZATION

### CONTEXT AND STAKES

Sponsorship\*, Patronage\*, Partnership\* and Membership\* activities contribute to Naval Group's worldwide reputation.

This is why, when they are carried out in the name of Naval Group, these activities are strictly supervised and must be subject to a validation circuit before they are implemented.

However, such operations could conceal quite different objectives or interests, and could be vehicles for corruption or influence peddling. They could damage the company's reputation and/or expose it to legal proceedings.

For the record, they must not contravene the strict religious, political and philosophical neutrality observed by the company, which does not prevent an employee from engaging in such activities in a private capacity and as a citizen. In such cases, the employee is required not to indicate his/her connection with Naval Group, and not to use the image and brand in support of his/her convictions.

Nota: this section covers scientific, technical and academic partnerships, but not industrial partnerships.

### THE RULE

**All requests for Patronage, Sponsorship, Membership or Partnerships must be approved according to the following scheme, and in the following order:**

	Validation of the project by the relevant member of COMEX (or N-1 COMEX)	Assessment of the Communications department on conformity with the communication policy	Legal assessment from the Legal department	Compliance assessment from the Compliance department	Contract signature	Procurement
<b>Patronage</b>	✔	✔	✔	✔	DCO/D	ERP
<b>Sponsoring</b>	✔	✔	✔	✔	DCO/D	ERP
<b>Partnership</b>	✔	✘	✔	✔	Authorized person	ERP
<b>Membership</b>	✔ <small>(or N-2 COMEX)</small>	✘	✘	✔	Authorized person	ERP

(\* ) terms defined in the glossary p.23



**Nota:** these rules are adapted for subsidiaries (cf. the Compliance Officer of the subsidiary concerned).

## THE RIGHT REFLEXES

### 1 Ask yourself the right questions

- Does the planned project respect Naval Group's principle of neutrality?
- Does the potential visibility of Naval Group through this entity correspond to the company's image strategy?
- Is the proposed expenditure proportionate to the nature of the planned activities? Is it justified for the company?
- Is this activity likely to be perceived by a bona fide Third Party as corruption or influence peddling?
- Is the proposed transaction exempt of conflicts of interest?

### 2 Adopt the right behaviors

- In all cases, I ask for prior approval of the project from my line manager and, before signing the contract, I make sure that a compliance assessment has been issued and that any mitigation measures have been implemented.
- For a membership, I make a declaration in the compliance software and send the supporting documents.
- For Patronage, Sponsorship or Partnerships, I send a "request for a compliance assessment" to the group Compliance department, as far in advance of the project as possible (BMS – 000252545).
- For Patronage or Sponsorship, I use the visa form appended to the anticorruption manual (BMS – 000251967).

## PRACTICAL CASE

"A member of a committee awarding a public tender for which Naval Group is a candidate asked me to sponsor the association he chairs. He tells me that all the companies participating in the tender have made generous contributions."

I politely decline the request, pointing out that it is not the company's policy, and inform my manager.

"A sports club, of which several Naval Group employees are members, asked the company to sponsor a national tournament."

I request approval from the company Communications department to verify accordance with Naval Group policy. If I receive a favorable opinion, I send a request for a compliance risk assessment to the company Compliance department.



**FOR FURTHER INFORMATION,**  
refer to the **anticorruption manual** in the BMS (000251967) or  
contact your Compliance Officer.

5

**GIFTS, MEALS AND HOSPITALITY**  
**SUPERVISION, AUTHORIZATION AND DECLARATION**

**CONTEXT AND STAKES**

In many countries, gifts, meals and hospitality can play an important role in establishing and maintaining good business relationships.

**In some countries, however, they may be prohibited by law.**

Gifts and invitations, whether received or offered by a Third Party, are only acceptable if criteria of transparency and proportionality are respected. They must always be reasonable, and must not be intended to grant or obtain an undue advantage, or to influence a decision.

**THE RULE**

- 1. All gifts, invitations, hospitality or meals received or offered must be declared and notified in accordance with the following thresholds:**



**Gifts or hospitality given or received**

	< 50€	≥ 50 €	≥ 150 €
Compliance software	✘	✔	✔
Compliance assessment	✘	✘	✔
Notification to the Manager	✔	✔	✔



**Meals given or received (amount per person)**

	< 100€	≥ 100 €	≥ 150 €
Compliance software	✘	✔	✔
Compliance assessment	✘	✘	✔
Notification to the Manager	✔	✔	✔

- 2. Gifts, meals, invitations and hospitality must be declared independently of the thresholds when the cumulative value over the year exceeds €200 with the same third party.**
- 3. It is forbidden to receive or give a gift in the form of a sum of money in cash, a cheque, a bank transfer, a gift card or a gift voucher, whatever the amount.**

Recommendation: it is good practice to declare all gifts, meals, invitations and hospitality, regardless of the thresholds.



**Note:** these rules are adapted for subsidiaries (cf. the Compliance Officer of the subsidiary concerned).

## THE RIGHT REFLEXES

### 1 Ask yourself the right questions

- Does the country's legislation authorize gifts? And if so, does it set a threshold on the amount?
- Could this gift/meal change my behavior towards the person or company? Could it change the person's behavior towards me or my company?
- Can I talk openly with my colleagues about this gift or meal?
- Would my manager agree to my giving/receiving this gift?
- Isn't this gift against group rules?
- Is this gift/meal of modest and reasonable value? Could I offer it in return?

### 2 Adopt the right behaviors

- I declare all gifts, meals and hospitality in the compliance software, regardless of the thresholds.
- In case of doubt, I seek the advice of my manager, the local Compliance Officer and/or, if necessary, the company Compliance department.
- I politely decline any gift, meal or hospitality that does not meet the conditions set by Naval Group.
- I do not offer or accept invitations, gifts or hospitality when negotiations are in progress (including contract renewals and amendments).
- I prefer invitations to lunch in a company restaurant.

## PRACTICAL CASE

"Following the organization of a business meeting with a high-ranking foreign official, I would like to thank the latter's assistant with a perfume worth €100."

After some thought, I have decided not to make this gift, as it could be misinterpreted.

"Following the conclusion of a contract with a supplier, the latter offered me a box of chocolates to thank me for my involvement in the project."

I can accept the gift because it is a modest price and declare it in the software.



**FOR FURTHER INFORMATION,**  
refer to the **anticorruption manual** in the BMS (000251967) or contact your Compliance Officer.

**6****ACCOUNTING AND FINANCIAL DATA**  
**ACCURACY OF INFORMATIONS, FIGHTING MONEY**  
**LAUNDERING AND TAX EVASION****CONTEXT AND STAKES**

Naval Group is committed to complying with all laws relating to the fight against money laundering and the financing of terrorism, and only accepts funds from legitimate sources.

The group also complies with all applicable laws and regulations governing accounting and financial reporting.

Each employee, at his or her own level, plays an active role in maintaining good accounting practices, by submitting supporting documents in a timely manner (invoices for expense reimbursements, etc.).

Naval Group only does business with reputable customers and suppliers who are not on sanctions or exclusions lists.

Naval Group refuses any contract that could promote or facilitate tax evasion by its suppliers, customers or other Third Parties.

Certain acts of corruption can be detected via financial flows and/or records in the company's information systems.

**THE RULE****To fulfill our commitments, we must:**

- categorize and record our transactions and assets appropriately and diligently;
- implement appropriate controls to present our financial data reliably and consistently, including balance sheets and results of operations, to ensure a complete audit trail;
- protect our assets adequately;
- our assets appropriately;
- report our transactions objectively and in a timely manner;
- present business information and financial forecasts fairly and accurately;
- keeps documents and financial information in accordance with the law and internal retention rules;
- cooperate fully with any external or internal audit mission, and provide full answers to questions and requests in a timely manner.

## THE RIGHT REFLEXES

### 1 Ask yourself the right questions

- Is the bank account to which the payment will be made in the name of a listed supplier?
- Is the bank account to which the payment will be made in the name of a company and not an individual?
- Does the payment correspond to a service actually provided?
- Are the elements or the financial package transparent and sufficiently documented?
- Are the commercial and financial information presented in a sincere and honorable manner?

### 2 Adopt the right behaviors

- I transmit only accurate and reliable information, in a diligent manner.
- I have no business relations with a company that is on a sanctions list.
- Before any payment, I check the materiality of the services provided.
- Before any payment, I check that the bank account is that of the service provider concerned.
- I do not accept payments from entities other than the customer.
- I do not use a group credit card for personal expenses or unjustified payments.

## PRATICAL CASE

"A supplier is offering me a benefit to pay undue invoices."

I politely declined the offer and informed my manager.

"I am considering working with a service provider based in France who wants to be paid from a bank account in the British Virgin Islands."

I inform the service provider that the company's rules prohibit payments to such an account and I ask him to indicate one located in France.



**FOR FURTHER INFORMATION,**  
refer to the **anticorruption manual** in the BMS (000251967) or  
contact your Compliance Officer.

## 7

**AWARENESS, TRAINING  
AND GOLDEN RULES****AWARENESS AND TRAINING**

- Completion of **the anticorruption awareness e-learning course “Let’s fight corruption and influence peddling”** is compulsory for all employees.
- Completion of **the “Anticorruption - Reinforced module” e-learning training course** is compulsory for those considered to be most exposed to the risks of corruption or influence peddling, in view of their profession (based on the company’s corruption and influence peddling risk map).

**GOLDEN RULES**

**I am acting against corruption and influence peddling through 10 actions:**

- ✓ **I undertake to remain vigilant** against corruption and influence peddling
- ✓ **I have read the anticorruption code of conduct**
- ✓ **I have taken the anticorruption e-learning course**
- ✓ **I am able to identify** corruption risks related to my functions
- ✓ **I know the name** of my Compliance Officer
- ✓ **I am regularly informed by my manager** about the fight against corruption
- ✓ **I know how to declare** gifts and meals received or offered
- ✓ **I know how to deal with a conflict of interest situation**
- ✓ **I am aware** of the whistleblowing system
- ✓ **I report** actual or potential corruption

**DOUBTS, QUESTIONS**

If you have any doubts and/or questions about how to behave, please do not hesitate to contact the **company Compliance department** or your **Compliance Officer**.

Each site, each subsidiary and each COMEX department has a Compliance Officer. The list is available on the company Compliance department’s Navista page.

## 8

**SANCTIONS**

In each of the French sites and each of the subsidiaries, the Anticorruption Code of conduct is appended to the internal regulations (or any other equivalent system, where applicable). It is therefore binding on all employees, who are required to comply with it.

In application of Naval Group's zero tolerance policy with regard to corruption and influence peddling, **any breach by an employee of any of the provisions of this code may result in a sanction** which may immediately affect his/her presence in the group, his/her position, his/her career or his/her remuneration.

**Depending on the nature and seriousness of such conduct, sanctions range from a written warning to dismissal, suspension or transfer.**

In addition, the rules set out in this code are cumulative with those laid down by applicable local or international legislation.

**In addition to any penalties imposed by the company, criminal or administrative penalties** may be imposed on an employee and/or the company.

In France, the penalties for corruption or influence peddling are as follows (extract from the Criminal Code):

- natural person: 10 years' imprisonment and a fine of €1 million, which may be increased to twice the amount of the proceeds from the offence;
- legal entity: five times the fine for natural persons;
- exclusion from public contracts.

Finally, it should not be forgotten that the company is required to comply with the laws and regulations applicable in the countries where it operates and that, for reasons of extraterritoriality, it may also be exposed to the anticorruption laws of a country where it does not operate.

**9****WHISTLEBLOWING LINE  
SPEAK UP NAVAL GROUP**

Naval Group encourages any person who is a victim, witness or is aware of a situation or behavior that is contrary to the company's rules or any applicable legislation or regulations, to share their doubts and concerns by reporting them.

To this end, in addition to the pre-existing internal relays available to any employee wishing to make a report, in particular through the management line, human resources departments or designated referents, Naval Group provides its employees and stakeholders with an alert system, accessible at the following address:

**[speakup.naval-group.com](https://speakup.naval-group.com)**

**IN WHICH CASE DO I NEED TO MAKE A REPORT?**

A report may concern, among other things, corruption or influence peddling, discrimination, harassment, anti-competitive practices, a breach of the rules applicable to export controls or international economic sanctions, a financial or accounting offence, or any matter relating to the duty of vigilance.

Excluded from the scope of application are items covered by national defense secrecy, medical secrecy, the secrecy of judicial deliberations, the secrecy of investigations, the secrecy of judicial investigations or the professional secrecy of lawyers.

**WHAT ARE MY GUARANTEES?**

The use of this system offers the possibility, if the sender so chooses, of making a report anonymously and of continuing the exchanges in strict accordance with this anonymity.

It also offers every guarantee in terms of data protection.

In addition, Naval Group undertakes to ensure that the author of a report who acts in good faith will not be subject to reprisals, even if the facts covered by the report subsequently prove to be inaccurate or do not give rise to any follow-up.

For more information, visit the **Navista** page of the group Compliance department and refer to the **anticorruption manual** in the BMS (000251967).

# Glossary

## Membership

Joining an organization (usually a professional association) by filling in a membership form and, where applicable, paying a membership fee.

## Public servant and Public official

A public official is a person employed by the administration of a State (civil servant, magistrate, soldier, etc.) whereas the notion of public official applies more generally to public players such as members of a government and ministerial cabinets, deputies and senators or local elected representatives, people holding a job decided by the Government.

## Business Advisor

A Business Advisor is an entity contracted by Naval Group to carry out an activity as a consultant, advisor or expert, in connection with a commercial objective.

## Compliance due diligence

Process by which Naval Group assesses the exposure to the risk of corruption of the contractual relationship with a third party.

## Patronage

Material, human or financial support provided without any direct or indirect counterpart on the part of the beneficiary to a charity or person for the performance of activities of general interest.

## Partnership

Active association of different stakeholders who, while maintaining their autonomy, agree to pool their efforts to achieve a common goal related to a clearly identified problem or need in which, by virtue of their respective missions, they have an interest, a responsibility, a motivation or even an obligation.

## Politically Exposed Person (PEP)

A person who is exposed to particular risks by virtue of the political, jurisdictional or administrative functions that he or she performs or has performed on behalf of a State; or those that are performed or have been performed by direct members of his or her family or by persons known to be closely associated with him or her or who become closely associated with him or her in the course of a business relationship.

## Sponsoring

Material or financial support given to an organization by a company that derives a direct benefit from it. Sponsorship operations are designed to promote the image of the "sponsor" for commercial purposes. They are essentially distinguished from sponsorship by the nature and amount of the consideration. In a sponsorship operation, the company's payment corresponds to remuneration for the service provided by the organization.

## Third party

Any legal or natural person who wishes to enter into (or is already in) a relationship with Naval Group, otherwise known as an "external stakeholder".

