

# ANTICORRUPTION POLICY

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**ANTICORRUPTION POLICY**

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

In compliance 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 19<sup>th</sup> 2021 and is committed to its continuous improvement.

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

- **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;
- a corruption and influence peddling **risk map**, cornerstone of the program, on the basis on which the group's prevention and detection measures are defined. It includes an in-depth analysis of the group's internal processes, business activities, as well as of its geographical facilities.
- **risk management approach** structured as follows:
  - o the publication and distribution of a **Compliance code of conduct** and its related procedures, which define the rules applicable to all group employees. Any breach may justify the application of a disciplinary sanction,
  - o **awareness-raising campaigns** for all employees, as a medium of the group's culture of integrity, and specific **training sessions** targeted for the most exposed personnel;
  - o 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,
  - o a secured **whistleblowing management system**, accessible both to employees and third parties, enabling the collection and managing, in a complete confidential manner, 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 group,
  - o a three-level **internal control system**, aimed notably at assessing compliance with the group 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 group's integrity as well as its commitment to fight corruption.

Pierre-Eric Pommelet  
CEO

