



**MBDA
INTEGRITY LINE**





MBDA INTEGRITY LINE PROCEDURE

Date of Issue: 18 December 2023

MBDA has set up a dedicated Integrity Line and associated management system to protect the persons who report issues, to foster an open culture of reporting concerns, and to remediate risks of breaches or actual breaches at an early stage.

SUMMARY

PRINCIPLES3
RAISING A REPORT6



PRINCIPLES

Context

MBDA's reputation is based on integrity and the respect of laws and regulations – both in its domestic countries and in export countries where it operates. Operating at the highest responsible and ethical standards are key to its reputation and future business success. Activities which could involve the company in unlawful practices are prohibited.

In the event there is any reason to believe that a violation of MBDA Code of Ethics, policies and/or procedures, any applicable laws and regulation has occurred, MBDA has established a specific process to report concerns of violation

Objective

MBDA has set up a dedicated Integrity Line and associated management system to protect the persons who report issues, to foster an open culture of reporting concerns, and to remediate risks of breaches or actual breaches at an early stage.

Scope

It is MBDA's vision to be the European missile systems champion and a global player. MBDA operates in a highly regulated sector, in its home nations and export countries, delivering sovereign capabilities to states and governments as an integrated company. The Integrity Line is open to:

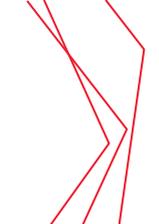
- Employees, apprentices, interns, graduates;
- Suppliers, customers, partners, contingent workers;
- Anyone with a working relationship with MBDA; and
- Any stakeholder wherever located in the world.

Any persons issuing a report through the Integrity Line:

- must not deliberately and knowingly report wrong or misleading information;
- have reasonable grounds to believe, in light of the circumstances and the information available to them at the time of reporting, that the matters reported by them are true;
- can issue a report anonymously.

The Integrity Line is designed to capture:

- violations of the MBDA Code of Ethics, policies and procedures;

- 
-
- violation of any applicable laws and regulations;
 - harmful conduct against persons reporting through the Integrity Line; and
 - concealment attempts of wrongdoings.

It covers, but is not limited to, violations in connection with, or in the field of, corruption and influence peddling, fraud, Merger & Acquisition / Joint-Venture / alliances, money laundering, fair competition / anti-trust, insider trading, lobbying, trade / export compliance, classified information, intellectual property, human rights, product safety, cybersecurity, environment, personal data protection, harassment, working environment, workplace health and safety, terms and conditions of employment, bullying / discrimination / work practice.

The Integrity Line shall not be used to report:

- Defence classified information
- Information subject to export license
- Medical secrets
- Legal professional privilege information, deliberations of judicial proceedings, secrecy of criminal investigations or proceedings

If a dedicated mechanism exists for specific fields, such as workplace health and safety rules breaches or grievance mechanisms for instance, the breach shall be reported through the relevant designated National companies' or functional directorates' mechanisms.

Commitments

MBDA is fully committed to an open culture of speaking-up and listening and encourages concerned stakeholders to ask questions, raise concerns and report potential violations. Throughout the Integrity Line process, MBDA commits to trustworthiness, impartiality, integrity, confidentiality and protection of the persons raising a report and subject to a report.

MBDA will not tolerate any retaliation by any employee of the company, and/or by the company itself, directly or indirectly, against any person who, in good faith, issued a report under the Integrity Line or provides assistance to those responsible for investigating the report. As such, any employee who makes a report in good faith will not suffer harm or be subject to any disciplinary action even if the report is later shown to be inaccurate or unfounded.

MBDA will not permit harassment against any person as a result of the submission of a report. Furthermore, MBDA will not permit any adverse employment consequences to the reporting person as a result of the submission in good faith of a report.

In accordance with applicable laws, MBDA will keep the identity of the person making the report through the Integrity Line strictly confidential.

No person being the subject of a report shall be subject of any disciplinary procedures unless an investigation finds that the violation is established. In line with national laws, the persons involved have the right to access the data that concerns them and to request that such data be corrected or deleted, where appropriate.

MBDA commits to take the protective measures necessary to prevent the destruction of evidence relevant to the report.



MBDA commits to ensure the authority, independence and competence of the persons in charge of operating the Integrity Line and associated investigations.
MBDA commits to the continuous improvement of its Integrity Line system by systematically monitoring, detecting and remediating non-conformities.

The Integrity Line system is designed to follow the guidance established by ISO37002 Whistleblowing management systems and the requirements of ISO37001 Anti-bribery management systems.

RAISING A REPORT

Any employee, supplier, customer, person with a working relationship with MBDA or any stakeholder may report a violation of the MBDA Code of Ethics, any applicable laws and regulations through a dedicated hotline, the Integrity Line: www.line.mbda.com



To ensure integrity, security and confidentiality and to allow anonymity, MBDA has carefully selected, and contracted with, a third party company to provide the Integrity Line platform service.

Reporting persons should have reasonable grounds to believe, in light of the circumstances and the information available to them at the time of reporting, that the matters reported by them are true. They must not, deliberately and knowingly report wrong or misleading information. MBDA protects the persons who raise a report through the Integrity Line in good faith and do not retaliate against them or those assisting in the processing of the report.

MBDA shall address all raised reports and respond and maintain communication with the person who raised the report – even anonymously – through the Integrity Line platform. Support in using the Integrity Line could be sought with the MBDA Compliance function.

A manager who is reported with an allegation shall report it through the Integrity Line.

Although according to the Directive EU 2019/1937, “*internal reporting is the best way to get information*”, the persons willing to raise a report have the possibility to directly make their report through an external reporting channel, in accordance with applicable laws ([FR](#), [IT](#), [DE](#), [ES](#)).