

**DONATIONS AND
SPONSORSHIP
POLICY**

BMS3938
Issue 4

« *Ethics, Compliance
and Corporate
Responsibility* »



DONATIONS AND SPONSORSHIP POLICY

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MBDA must ensure such donation and sponsorship activities and related funding fully comply with its anti-corruption principles. MBDA operates in many countries worldwide, through its industrial activities or the commercial campaigns and projects it carries out. An important aspect of MBDA’s commitment to responsible corporate behaviour is to exercise social responsibility through donation and sponsorship wherever it operates.

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PREAMBLE

MBDA operates in many countries worldwide, through its industrial activities or the commercial campaigns and projects it carries out. An important aspect of MBDA's commitment to responsible corporate behaviour is to exercise social responsibility through donation and sponsorship wherever it operates.

MBDA must then ensure such donation and sponsorship activities and related funding fully comply with its anti-corruption principles as stated in its Anti-Bribery and Corruption Policy and with the objectives that led to the decision of carrying them out and are not and cannot be perceived by a third party to be for the purpose of corruption.

SCOPE

This document describes the Donation and Sponsorship Policy and covers all stages of the procedure to be applied for any corresponding operation, from the initial request to the execution and post-operation activities.

This document is a Group document which defines rules and requirements to be applied in all MBDA companies

For the purpose of this document, donation and sponsorship are defined as follows:

- Donation: voluntary contribution to external parties, whether financial or through other forms of support, for which there are no tangible benefits or commercial return. Patronage is considered as donation.
- Sponsorship: act of supporting financially or through the provision of goods or services, an event, activity, project or organization, in return for services or visibility agreed by both parties. Sponsorship is part of the overall MBDA communication activities as a commercial means to enhance and promote image, branding and positioning.

Are excluded from the scope of this Procedure donations and sponsorship made by MBDA employees as individuals which in this case shall be done without any association to MBDA; and membership in trade associations or professional bodies directly connected to our activities or areas of competences and in bodies that regulate the activities of companies in industry sector (e.g. ASD, IFBEC, GIFAS, standardization bodies...)



DONATION AND SPONSORSHIP POLICY

Key Requirements with respect to Donations and Sponsorship

Any D&S operation shall:

- Relate to MBDA's strategic objectives in terms of donations and sponsorship and corresponding standard initiatives;
- Be made in compliance with MBDA Anti-Corruption principles and any applicable laws and regulations;
- Be subject to pre-approval in accordance with defined criteria and thresholds;
- Be properly executed and recorded

Strategic Objectives in terms of Donation and Sponsorship activities

D&S activities shall aim to:

- Support the reputation of MBDA as a good corporate citizen by participating in the initiatives of the communities where it operates;
- Develop our values-led culture by participating in national good causes, humanitarian causes and social initiatives coming from our employees;
- Support the development of MBDA as a well-known and attractive company to work with by participating in educational initiatives or business events in relation with our activities;
- Demonstrate MBDA is a trusted partner by supporting initiatives or events with the view of strengthening the level of confidence those customers place in MBDA.

Initiatives supported by MBDA

In relation with these strategic objectives, MBDA has chosen to support selected initiatives, hereafter referred to as "Standard initiatives".

Local Communities: Through a variety of initiatives, MBDA strives to be a positive force within the community. MBDA acts to help local charities, non-profit organisations and good causes related to youth development, social participation in the domain of sport, arts, culture or heritage, and environmental initiatives.

Education: MBDA provides support to Education and Research & Development in countries in which MBDA operates with a strong focus on science, technology, engineering and mathematics.



Humanitarian Assistance: MBDA aims to assist through a financial contribution the countries where it operates facing humanitarian emergencies needing an immediate response.

National Events / National Causes: In countries in which it operates, MBDA supports commemorative events and celebrations recognised by the corresponding government and national health causes.

Military Charities: MBDA supports military charities related to in-service injured service members and their families; armed forces veterans and active service members; fundraisers organised by military charities.

Customer Events: MBDA works with its Customers globally to build and maintain long term relationships, as such MBDA will, under the correct circumstances and taking into account the correct governance criteria, sponsor customer events; sporting and other official receptions and galas which are often celebrating anniversaries such as the end of conflicts / wars.

Conferences & think tanks: MBDA may contribute to select Defense events, conferences, projects, think tanks or other initiatives in the area of our business domain to enhance MBDA's thought leadership and visibility.

Employee Organisations Events: MBDA supports select social events, mainly in the area of sport, at the initiative of its employee organisations.

Employee Fundraising: In some occasions, MBDA may wish to facilitate the fundraising of money through its employees.

Ineligible initiatives

Donation or sponsorship are not eligible for MBDA if the corresponding initiative:

- Pursues a religious or ideological objective; this includes contributions, financial or in kind, to political parties or political / religious organisations, or to individual politicians;
- Creates a personal benefit for the beneficiary;
- Ultimately personally benefits an employee of MBDA;
- Is intended to influence, or could reasonably be perceived to influence, a tender or other decision in favour of MBDA;
- Includes conflicts of interest;
- Is made to an individual or to a private account;
- Is made in cash.

Non-standard initiatives

Non-standard initiatives are initiatives that fall outside the definition of standard initiatives in or within the definition of ineligible ones in; or is made in response to a customer's solicitation.



Eligibility of a Donations and Sponsorship

Before supporting a D&S initiative the following criteria must be satisfactorily assessed:

- Not part of listed ineligible initiatives
- Compliance with applicable laws.
- Compliance with MBDA's D&S strategic objectives and standard initiatives;
- Compliance with the concerned MBDA entity D&S strategy;
- Relevance of the operation with regards to the overall context (economical, strategic, commercial...)
- Estimated value of the operation appropriate with respect to local conditions and similar operations;

D&S initiatives shall comply with MBDA Anti-Corruption criteria, including as a minimum:

- The beneficiary organisation is clearly identified;
- The beneficiary organisation has good reputation;
- The operation does not include or induce conflicts of interest;
- The operation is not intended or cannot be perceived as undue influence in particular if operation is in relation to commercial campaigns.

Training & Awareness

General awareness and communication actions should be undertaken to ensure any employee who could end up as an Applicant has general knowledge and understanding around the purpose and principles of the D&S policy and procedure.

Exposed persons shall receive appropriate training. Such training shall be repeated on a regular basis, as often as necessary. Attendance shall be regarded as mandatory.

DONATIONS & SPONSORSHIP PROCEDURE SUMMARY

Any donation or sponsorship by an MBDA company shall follow the Procedure.

It is the spirit, and not only the letter, of the Procedure that must be complied with. Deliberately trying to avoid falling into the Procedure by any means will be considered as a breach. Any such attempt or any failure to comply with the Procedure will lead to appropriate disciplinary actions in accordance with applicable laws and regulations and MBDA Human Resources policies.

If uncertain whether falling into the Procedure or not, or in case of doubt about any step of the process, advice shall be seek from the Compliance Officer.



The Procedure details:

- Identification of need or D&S activity
- Approval including general rules, operational levels, required approvals, controls & checks
- Execution and monitoring including contractual documents, sign-off, execution, monitoring, record-keeping and reporting
- Implementation within MBDA companies