



## CODE OF ETHICS



# CONTENTS



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‘MBDA’ in the context of this document is defined as: MBDA France, MBDA UK, MBDA Italia, MBDA Deutschland and MBDA España, all forming MBDA.

**Note:** ‘Find out more’ content is available to all employees of MBDA through the Company intranet site

## Message from the Chief Executive Officer 1

## Introduction 2

Why we have this Code 2

Who this Code applies to 2

Awareness and training 3

Consequences of violations of this Code 3

## Our principles of action 4

Compliance with Laws and Regulations 4

Commitment to Integrity 4

Seeking guidance and reporting concerns 4

## Managing our business 5

Customers 5

Suppliers 5

Fair competition 5

Corruption and influence peddling 6

Business advisers 7

Gifts and hospitality 8

Donations 9

Sponsorship 9

Mergers and acquisitions and other alliances 10

Conflicts of interest 10

Facilitation payments 11

Money laundering 11

Political contributions and activity 11

Lobbying 12

Export control 12

## Working together 13

Security of employees 13

Treating each other with respect 13

Equal opportunity and diversity 14

Career management 14

Social relations 14

## Protecting assets and information 15

Protecting MBDA and third-party assets 15

Classified information 15

Intellectual property 15

Data protection 16

Maintaining accurate records 16

Avoiding insider trading 17

Communication, relations with the media and use of social networks 17

## Being socially responsible 18

Protection of fundamental freedoms and human rights 18

Environmental protection 19

Health and Safety 19





## INTEGRITY

A reliable and trusted partner with the highest professional and ethical standards

# Message from the Chief Executive Officer



It is MBDA's vision to be the European Missile Systems champion and a global player. This requires MBDA to behave as an industry benchmark for innovation, operational excellence and ethical standards. For each of the company's employees, this results in exemplary behaviour and conduct, while respecting our values:

INNOVATION



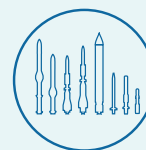
COMMITMENT



INTEGRITY



PASSION



TEAM SPIRIT



These values are key to both our current and future success and allow us to create a trustworthy environment both inside the company and with our customers and partners.

Our Group Code of Ethics not only sets out MBDA's ethical principles, it also explains how I expect each of you to behave when acting on behalf of our company. Our business must be conducted in strict compliance with the applicable laws related to anti corruption and influence peddling.

I encourage each of you, whether facing a situation you are not sure how to deal with, suspecting an act inconsistent with the principles of this Code or you need advice, to speak up openly and without any fear of retaliation.

Thank you for your commitment and strict compliance with these principles, which form a key element of our social responsibility and operational excellence, ensuring the sustainability of MBDA. Together, we will continue to make MBDA a company of integrity and responsibility that we are proud to work for.

Éric Béranger, CEO







# Introduction

## Why we have this code

Operating at the highest responsible and ethical standards are key to our reputation and future business success.

This Code of Ethics serves as a tool to help us reach this goal by setting out the ethical principles that underpin our values and actions. It also explains how we should conduct ourselves.

The Code of Ethics is implemented through policies and procedures, both at Group and National level. The key policies and procedures are referenced in this Code in order to provide easier access to more detailed information or guidance where necessary. All employees must refer to the policies and procedures relevant to their responsibilities, which are available in the MBDA Business Management System.

## Who this code applies to

The Code of Ethics applies to everyone within the company, regardless of location or role. All employees are expected to assume responsibility for performing their duties with fairness and integrity, to have an understanding of the Code of Ethics referring to it regularly and to have a detailed knowledge of those of its provisions that apply specifically to their job. If in doubt or if you have any question, you must consult your manager or the Ethics, Compliance and Corporate Responsibility Department.

MBDA managers have additional responsibilities that go beyond complying with the Code. Managers are expected to promote MBDA ethical standards and effectively communicate or make available the Code's principles, as well as relevant policies and procedures that apply to their job areas to all those who report to them. They should also be prepared to answer questions about the Code and create a comfortable working environment in which employees feel encouraged to bring forth questions or concerns.

### Awareness and training

The Code of Ethics is available on the MBDA intranet site and at all of our sites. It is also published on the MBDA internet site. Training sessions are organised by the Ethics, Compliance and Corporate Responsibility Department for managers and most exposed personnel. In addition, employees have access to the intranet site where they can find additional guidelines.

The Ethics, Compliance and Corporate Responsibility Department is at any employees' disposal to answer questions.

### Consequences of violations of this code

All employees are responsible for ensuring that their conduct and that of those reporting to them fully complies with the Code of Ethics. Violation of the Code may have severe and lasting consequences on MBDA's reputation, business relations and financial situation.

In the event of breach of one or several provisions of this Code, MBDA reserves the right to apply the disciplinary process as provided for in its internal rules of procedure or national Human Resource procedures. Such breaches may lead to sanctions up to and including dismissal.





# Our principles of action

## Compliance with laws and regulations

Our reputation is based on integrity and the respect of laws and regulations – both in our domestic countries and in export countries where we operate.

It is our personal responsibility to know the laws, regulations and requirements relating to our job. Any breach of these laws may lead to civil and criminal prosecution. Activities which could involve the company in unlawful practices are prohibited.

## Commitment to Integrity

The Code of Ethics is the foundation stone of the MBDA Integrity **Anti-bribery and Corruption** Programme. Its purpose is to define principles helping each of us to uphold our commitment to integrity in our daily work.

Many of our activities are not governed by laws or regulations, in which case the principle of integrity must govern our conduct. It is our personal responsibility to apply this principle at all times. No performance objectives should be imposed or accepted if they can only be achieved by compromising our ethical standards.

Find out more ▶

Anti-bribery and  
Corruption (BMS0356)

## Seeking guidance and reporting concerns

The Code of Ethics cannot cover every situation that we may face within our everyday role. We may find ourselves faced with a situation that we are not sure how to resolve. There are a number of ways that we can seek advice and support. We can contact our immediate manager, someone else in our management structure, the Human Resources Directorate, the Legal Directorate or the Ethics, Compliance and Corporate Responsibility Department.

In addition, if after having received the necessary advice and/or clarifications mentioned above you have any reason to believe that a violation of the Code or other improper conduct has occurred, you are encouraged to report your concerns to [www.line.mbda.com](http://www.line.mbda.com). Your concern will be treated seriously and fairly as provided for in the internal procedure related to the management of allegations.



MBDA is committed to letting no concerns go unresolved. Finally, MBDA will tolerate no reprisal against employees making such a report selflessly and in good faith.

Find out more ▶

MBDA Integrity Line  
Procedure (BMS3488)



# Managing our business



## Customers

We are committed to treating all our customers honestly and fairly, whatever the size of their business and honouring our contractual commitments at all times. We must provide our customers with high-quality and safe products and services that meet their expectations.

Quality and safety are core values for MBDA and we must comply with all control standards, including applicable laws and regulations as well as internal control procedures ensuring safe and high-quality products are delivered to our customers.

## Suppliers

Suppliers deliver an important part of the value of our products and play an important role in customer satisfaction. We must promote ethical relationships with our suppliers and make sure that they are treated fairly and equally.

In the selection of goods and services account must be taken of ethics, cost, quality, performance, delivery and suitability.

Find out more

Supply Chain Business  
Ethics (BMS3792)

## Fair competition

We must always behave ethically when competing for customers' business and when placing business with suppliers. Honesty and integrity clearly apply to our dealings with both customers and suppliers. This is especially true in the development phase of new business and in the negotiation phase of contracts. We must always comply with competition and antitrust laws.



## Corruption<sup>1</sup> and influence peddling<sup>2</sup>

MBDA rejects corruption of any kind, under any circumstances, whether public or private, active or passive, direct or indirect and applies a zero tolerance principle. It maintains a comprehensive anti-bribery and corruption programme and asks its Stakeholders to comply with it.

MBDA strictly adheres to the principles of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. MBDA also fully subscribes to the laws and regulations in force in the countries where it is located and/or where it operates, eg. the *UK Bribery Act 2010*, the Italian law-decree *Dlgs 231/2001* and the French law n° 2016-1691 regarding transparency, the fight against corruption and the modernisation of economic life, known as *Sapin II*.

As a member of the AeroSpace and Defence Industries Association of Europe (ASD), MBDA recognises that the *Common Industry Standards* issued by ASD reflect good industry practice and adheres to their terms.

Find out more ▶

Anti-Bribery and  
Corruption Policy (BMS4645)

<sup>1</sup> Corruption is defined as an act whereby a person holding a specific public or private sector function, solicits or proffers or accepts or gives a gift, offer or promise to carry out, obstruct or abstain from carrying out an act pertaining directly or indirectly to his function.

<sup>2</sup> Influence peddling is defined as 'The direct or indirect request or acceptance without right and at any time of offers, promises, donations, gifts or advantages for oneself or others, when done by a person holding public authority or discharging a public service mission, or by a person holding a public electoral mandate: to carry out or abstain from carrying out an act relating to his office, duty, or mandate, or facilitated by his office, duty or mandate; or to abuse his real or alleged influence with a view to obtaining from any public body or administration any distinction, employment, contract or any other favourable decision'.



## Business advisers

We must not hire someone else to do anything that we cannot ethically or legally do ourselves. Engaging a third-party to indirectly make an improper payment violates anti-corruption laws. The selection of business advisers is guided by strict internal procedures.

Find out more ▶

Business Advisers  
Procedure (BMS3492)

## Example

**Q:** *When answering an international request for proposal issued by a foreign government, I am recommended by local partners to use a local person of influence to provide assistance. This person is not directly involved in our sector of activity but made it known that he/she could use his/her relationship to help us win the contract. May I ask for his/her help?*

**A:** *Consult your manager and the Ethics, Compliance and Corporate Responsibility Department to get direction and support on the strict internal procedures governing the appointment of business advisers. The fact that this person is not directly involved in our sector of activity is an element of alert. Moreover, MBDA prohibits any act by which a person abuses influence related to his/her function with a view to obtaining business.*





## Gifts and hospitality

MBDA is committed to ensuring that any business decision made by us, our customers, suppliers or other business partners is solely based on relevant criteria, such as competitiveness, performance and quality of products and services offered. Business courtesies, such as gifts and hospitality, offered to or received from customers, suppliers or other business partners must reflect a normal courtesy of business and may not influence, or give the appearance of influencing, any business decision.

Gifts and hospitality must not be offered or received with a corrupt or influence peddling purpose anywhere in the world. Reasonable behaviour, common sense and prudence should always guide us in these situations and it is our duty to always comply with our internal procedures as well as with the laws and regulations of countries where we are located and/or where we do business.

The type of gifts and hospitality, whether received or offered, and when known their value, must be registered in the company's dedicated internal register in accordance with the rules defined in the internal procedure related to gifts and hospitality. Gifts in cash or any hospitality which are not business related are never permitted.

Find out more ▶

[Gifts and Hospitality Policy and Procedure \(BMS3940\)](#)



## Examples

**Q:** *I am invited by a supplier to a famous sports event. May I accept?*

**A:** *Events with suppliers are an opportunity to strengthen our ties with them and to maintain the business relationship. Accepting such an invitation is not prohibited per se, provided it is part of the business relationship between MBDA and its business partners, that it does not influence any commercial decision and that the value of the invitation remains reasonable. If in doubt, please seek advice from the Business Ethics Directorate.*

**Q:** *When travelling abroad for the purpose of a contract negotiation, one of our local partners invites me to stay longer and visit him in his second home. May I go?*

**A:** *This kind of invitation is not directly related to business purposes. This might put you in an uncomfortable situation, especially during contractual negotiations. Thank the local partner for inviting you and decline the proposal. Report it to the Business Ethics Directorate who will support you with further information, in line with the MBDA Gifts and Hospitality procedure.*



## Donations

Donations to public-interest or private organisations on behalf of MBDA may be permitted in compliance with all applicable laws and regulations. Decisions to engage the company in any donations to our communities or charities is subject to prior approval of MBDA and must be properly recorded.

## Sponsorship

Sponsorship is part of the marketing and communication strategy. It is authorised in compliance with applicable laws and regulations. Decisions to engage the company in any sponsorship is subject to prior approval of MBDA and must be properly recorded.

Find out more ►

[Donations and Sponsorship Policy and Procedure \(BMS3938\)](#)

## Example

**Q:** *I have been asked by a local association if MBDA could sponsor one of their events. May I do it?*

**A:** *You must refer to the internal procedure related to donations and sponsorship which covers such situations. If you need any additional information, please contact the Ethics, Compliance and Corporate Responsibility Department.*







### Mergers and acquisitions and other alliances

MBDA pays particular attention to business ethics matters in its any merger, acquisition or other alliance (joint venture, teaming agreement, memorandum of understanding etc) activities. This is to ensure we only engage with other entities who have the appropriate business ethics principles.

Find out more ▶

Manage Mergers and  
Acquisitions (BMS0591)

### Conflicts of interest

A conflict of interest consists in a set of facts where the personal or financial interest of a person may conflict with her/his role within MBDA and therefore with MBDA's interests. MBDA employees, interns, and apprentices must declare conflicts of interest.

Find out more ▶

Conflicts of Interest  
Policy (BMS4707)

### Example

**Q:** *My partner works for an MBDA supplier. I may have to place a purchase order with them. Can I proceed?*

**A:** *Depending on your partner's role in the supplier's company, there may be a risk of conflict of interests. Seek advice from your hierarchical manager or the Ethics, Compliance and Corporate Responsibility Department.*

## Facilitation payments

Facilitation payments are small unofficial payments to low-level public officials to speed up or obtain routine administrative processes.

Public officials may include government representatives (in particular members of the government) or civil servants (members of international organisations, ambassadors, judges, police officers, elected representatives, whether at local, national or international level). MBDA prohibits such facilitation payments in any country where we operate.

## Money laundering

Money laundering is the concealment of the origin of money coming from criminal activities. In compliance with all laws related to this matter, MBDA is committed to conducting business with reputable partners.

All of us must be cautious with the way payments are made to detect any irregularities with partners who demonstrate suspicious behaviours in their operations.



## Example

***Q: I shipped some MBDA equipment to a foreign country. It remains under custom control and I urgently need it. The customs official tells me it will not be cleared for a fortnight unless I make a cash payment, to significantly move the process along. Can I make the payment?***

***A: Answer that this kind of facilitation payment is prohibited by MBDA, no matter what the amount. Inform your hierarchical manager of the delay and report this request to the Ethics, Compliance and Corporate Responsibility Department.***

## Political contributions and activity

Political contributions are often subject to national laws and vary from country to country. MBDA's policy is not to make contributions, financial or in kind, to political parties or organisations, or to individual politicians.

MBDA respects the rights of its employees to participate as individuals in their community and civic affairs. This must be done at a personal level or through a Political Action Committee when permitted by law (such as in the US), in their own time and at their own expense, consistent with applicable laws. Employees need to carefully separate their own political activities from MBDA activities and avoid any conflict of interest.





## Lobbying

MBDA fully subscribes to laws and regulations regarding lobbyists in the countries where it is located and/or where it operates.

## Export control

We must comply with all applicable laws and regulations when importing and exporting products, services and information. If we fail to observe export control laws, the company (and individuals) may face fines, criminal prosecution and loss of authorisation to export.

The company is responsible for obtaining all necessary export authorisations from the relevant authorities and for informing its employees so that they can perform their duties within a clearly defined framework.

We must be familiar with MBDA's policies and procedures for handling goods, technology and data or providing services which may come into or go outside our country.

Find out more ►

**Export Compliance Policy of MBDA (BMS2535)**  
**Policy for the Control of US Material (ITAR and EAR) (BMS0935)**



# Working together



## Security of employees

MBDA does its utmost to protect its employees, wherever they are working. MBDA informs people of risks and sets out internal procedures to be followed, such as in the event of unstable political situations, criminal acts or health matters.

We must be aware of updated information delivered by MBDA, particularly with regards to business travel.

Find out more

[MBDA General Security Policy \(BMS0367\)](#)  
[Business Travel Security \(BMS0949\)](#)

## Treating each other with respect

Our responsibility is to treat others with respect. MBDA aims to create an environment where employees feel comfortable to voice their opinions in a professional and constructive way. MBDA does not tolerate any form of humiliation, harassment – sexual, physical or psychological – coercion, bullying or other offensive conduct.

We are committed to complying with all laws and regulations forbidding discrimination of any kind when recruiting or during the employment relationship.



## Equal opportunity and diversity

MBDA believes that diversity strengthens the company and seeks to recognise and value the differences between employees by building teams that reflect the markets and communities in which it operates.

The recruitment process is exclusively based on the applicant's experience, qualifications and skills, with remuneration solely determined on the basis of the contribution to the company.

Find out more ►

Ethics Charter in Favour  
of Diversity (BMS1135)

## Career management

MBDA aims to promote personal development. One of the key tools to facilitate development is regular face-to-face discussions with your manager. These discussions help focus on required skills, achievements, development plan and career paths according to individual needs and aspirations, as well as business requirements.

Training and collaborative ways of working also contribute to this process.

Find out more ►

Manage Human Resources and  
Competencies (BMS0585)

## Social relations

MBDA respects the right of all of us to form and join trade unions and workers' organisations to organise and bargain collectively.

MBDA respects the role and responsibilities of the social partners and commits to communicating and negotiating openly to address issues of collective interest.





# Protecting assets and information



## Protecting MBDA and third-party assets

We should do our utmost to protect the company's assets. MBDA's assets must not be used for illegal purposes or for purposes not related to the company's activities. We should not appropriate any company's assets for our own use or make them available to others for non-MBDA use.

In the course of doing business with MBDA, our customers, suppliers and other partners may entrust the company with confidential and proprietary information. To be a trustworthy business partner, we must handle third-party information with the same care as we take with company information, and cannot disclose it to any unauthorised persons.

## Classified information

Due to the nature of its products and services, MBDA creates and handles government security classified information. We must know and follow applicable MBDA policies and the established laws and regulations that govern our handling of such information. It is important to remember that these laws and regulations are generally considerably stricter than those governing dealings with non-government security classified information.

Access to government security classified information requires specific clearances, relative to the level of sensitivity. Any exchange or transmission of government security classified information or material must comply strictly with the relevant security process.

## Intellectual property

Intellectual property rights, which include patents, know-how, trade secrets, trademarks, domain names, industrial designs and copyrights, are one of MBDA's most valuable assets and must be protected by law, whenever possible.

All of us have a duty to safeguard these assets. We must also respect the intellectual property rights of third parties. We should never infringe on the intellectual property rights of others, including by violating copyrights or downloading software without the permission of the owner.

Find out more

Security Principles of the MBDA Group (BMS0913)  
MBDA General Security Policy (BMS0367)  
MBDA Information Security Policy (BMS2181)





## Data protection

MBDA pays the greatest attention to personal data protection, in accordance with applicable laws and regulations.

Access to personal data is limited to the sole persons whose function and responsibility justify it, on a case-by-case basis. As a general principle, MBDA does not communicate personal data to third parties, except to the extent necessary for the company's good operation and management and if allowed by applicable laws and regulations.

Find out more ▶

**MBDA Information  
Security Policy (BMS2181)**

## Maintaining accurate records

MBDA, our shareholders and business partners rely on the accuracy of the information contained in our business records. We therefore have a responsibility to ensure that the information we provide is accurate. This applies to all of our business records, including expense reports, contract documentation and time records.

In maintaining our financial records, we must follow internal control procedures. We may not create or participate in the creation of records that are intended to mislead or conceal any improper activity. This means, in part, that we must never make false, misleading or unrecorded entries.

We are expected to maintain company documents in accordance with any record retention legal requirements and internal procedures. Consult a dedicated focal point or a manager with questions as to how long you should retain a document or how to destroy it properly.

Find out more ▶

**Manage Finance (BMS0607)  
Retention of Company Records Policy (BMS3652)**

### Avoiding insider trading

Many countries have enacted insider trading laws. In line with these laws, we may not buy or sell the stock of any company while in possession of inside or privileged information about that company. This rule applies to the stock of our shareholders, as well as the stock of our customers, suppliers and partners listed on a public stock exchange.

In addition, we must not disclose any inside or privileged information to anyone, including co-workers, family members or friends.

### Communication, relations with the media and use of social networks

Media relations are the responsibility of the Communications Directorate. Unless approved in advance by the company, no MBDA employee is authorised to represent MBDA, express opinions or statements or to issue any information on behalf of the company to the media. This applies to all forms of communication media including internet social networking platforms eg. social forum web sites, blogs or chat rooms.

All MBDA material for media distribution shall be validated through the Communications Directorate and, where appropriate, the Legal Directorate. This material shall be compliant with the MBDA graphic standards and be retained on record.

Find out more ▶

Manage Communications  
(BMS0611)





# Being socially responsible



## **Protection of fundamental freedoms and human rights**

MBDA ensures fundamental freedoms and human rights are respected.

MBDA fully subscribes to the international instruments establishing prohibition of forced labour, elimination of all forms of child labour, right to dignity at work, freedom of association or freedom of expression, assembly and association. Those principles are in particular embodied in the ILO's Core Conventions, the 1996 United Nations covenants on Civil and Political Rights (ICCPR) and on Economic, Social and Cultural Rights (ICESCR), the United Nations Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights.

MBDA is committed to abiding by these fundamental principles with respect to its employees, suppliers and providers, and to ensuring a safe and healthy working climate, free from any threat or violence.

MBDA also states its adherence to the national laws and regulations of the countries where it is located and in particular to the principles enshrined in the UK Modern Slavery Act, the French Declaration of the Rights of Man and of the Citizen, the French law n° 2017-399 on duty of care of parent and principal companies.

We are committed to taking the utmost care in identifying and preventing negative direct and indirect impacts our activities may have on human rights, fundamental freedoms and people health and safety. We pay particular attention to the rights of vulnerable people in the countries where we do business.

We incorporate protection of fundamental freedoms and human rights in particular when assessing risks and impacts in acquisition and divestment transactions or in our purchase and sales procedures.



### Environmental protection

MBDA has a responsibility to our global community to protect the environment. It aims to ensure that no environmental damage and no harm to local community environment may derive from its activities.

We must promote eco-efficiency in all of our business activities by striving to reduce the overall MBDA carbon and global environmental footprint. Environmental protection and eco-efficiency will be conducted within the framework of sustainable development and supported by Sustainable Procurement practices.

In addition, we are committed to complying with all applicable laws and regulations wherever we do business.

Find out more ▶

**MBDA Group Environment Policy (BMS0511)**  
**MBDA General Security Policy (BMS0367)**  
**MBDA Group Health and Safety Policy (BMS3818)**

Lastly, all of us as employees are encouraged to contribute to this collective effort and more generally to adopt individual environment-friendly behaviours, in particular through waste recycling and by using resources in a sustainable manner.

### Health and safety

MBDA is committed to pursuing the highest health and safety standards in the workplace. MBDA endeavours to implement the necessary programmes, training and internal controls to consistently promote safe work practices.

We must familiarise ourselves with, and follow, health and safety policies and procedures set up within MBDA.





Contact us

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