

ANTICORRUPTION POLICY

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ANTICORRUPTION POLICY

Naval Group considers corruption, including influence peddling, to be unacceptable and cannot tolerate or encourage any of its forms, perpetrated by one of its employees or a third party acting on its behalf.

Consequently, Naval Group has implemented an **anticorruption program** that strictly complies with French (Sapin II) law as well as with the regulations of the countries where it operates. Business ethics is thus strongly rooted within Naval Group's activities in France and abroad. Our company must remain vigilant in order to ensure that:

- No employee or third party acting on behalf of Naval Group must ever offer, promise, solicit or accept an advantage from / to a third party, whatever its form may be ;
- Any gift, invitation and hospitality given or received by an employee or any participation in associative and political life strictly complies with Naval Group's rules;
- Any third party acting on behalf of Naval Group must comply with the rules of the group.

By the end of 2021, I want Naval Group to be **ISO 37001** certified to demonstrate the maturity of our anti-corruption program and to make it part of a continuous improvement process. I ask everyone to contribute to the achievement of this objective, in accordance with their responsibilities, under the guidance of the Group Ethics, Compliance and Governance Department and its Compliance officers.

With this in mind, I ask the entity managers (sites, subsidiaries and functional departments) to do their utmost to **achieve by the end of 2020 at least level 3** (on a scale of 4) of maturity regarding the anti-corruption program, as defined in the compliance internal control grid, focusing on the following points:

- The commitment of the members of the Boards of our controlled companies;
- The involvement and exemplarity of the members of the management committees ;
- The awareness among managers' managers and newcomers ;
- The training of the most exposed employees;
- The compliance with the Compliance Code of Conduct and with the proceedings regarding business relationships with third parties (customers, suppliers, partners) as well as regarding sponsoring activities and membership in professional associations.

The reputation of our group is measured by the personal behavior of every one of us. I would like to remind that any employee who contravenes the rules of the group is subject to disciplinary sanctions. I would also like to remind the existence of Naval Group' whistleblowing line (ethics@naval-group.com) that allows anyone to report a behavior that is contrary to the company's code of ethics.



Pierre-Eric Pommellet
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