



**CODE OF
CONDUCT**

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1. Our Values

Dassault Aviation Business Services carries out its business in compliance with the national laws and international conventions in force in the countries in which it operates.

As well as complying with the relevant laws, the company adheres to a strict ethical code in its activities and expects its employees to follow the principles of integrity, fairness, transparency and honesty.

Dassault Aviation Business Services affirms, by its adherence to the Ethical Charter of the Dassault Aviation Group, the values that are to serve as a basis to unite the activities of all of its employees and the conduct of each individual in his or her dealings with the company's clients, suppliers and partners.

Within the context of this ethical approach, the Company has put in place an additional scheme specifically designed to prevent corruption and influence peddling, practices that are both reprehensible in themselves and would be harmful to the company image of Dassault Aviation Business Services and to that of the individuals who make up the company.

Thus, Dassault Aviation Business Services reasserts its commitment to apply a “zero tolerance” policy towards corruption and influence peddling, and to ensure full compliance with the laws and international agreements applicable to it.

2. Overview of the Anti-corruption Code

2.1. Purpose of the Code

This Code has been drawn up in order to set out the various types of conduct to be prohibited as being liable to characterise corruption and influence peddling and in order to present the scheme implemented by Dassault Aviation Business Services in order to prevent and detect such activities.

2.2. Scope

The Code applies to all employees of Dassault Aviation Business Services.

2.3. Penalties

Without prejudice to the penalties issued from the terms of the applicable legislation in this field, any failure to comply with the Anti-corruption Code is liable to give rise to application of the disciplinary penalties set out in the Company's internal regulations or policies.

3. Corruption and influence peddling: what are they?

3.1. Definition of corruption

Acts of corruption are increasingly being made illegal throughout the world. It may take various forms: active or passive, direct or indirect, relating to a public official or a private individual, national or international.

In general terms, and as a simplification, corruption involves offering or providing (or indeed requesting or receiving) a form of gain in return for carrying out (or refraining from carrying out) an act.

3.2. The various forms of corruption

- Active corruption (by the corrupting party)

Active corruption is characterised by an individual (the corrupting party) promising, offering or providing a form of gain of any kind to another individual (the corrupted party), for the latter party or for another party, so that the latter individual will carry out, or refrain from carrying out, an act that falls within his or her job description or is facilitated by his or her position.

It also designates an agreement to provide a form of gain of any kind to an individual requesting it, in return for the performance of an act falling within his or her job description or mandate.

All that is required is the making of offers or promises by the corrupting party, whether or not these are accepted by the other party, for criminal proceedings to be instigated. Performance of the act concerned, or receipt of unjustified gain is not in fact required for the offence to be committed.

Finally, it is of little importance whether the unjustified gain is provided before or after performance of the act in cause. Thus, subsequent gratification may give rise to penalties in the same way as the initial promise.

- Passive corruption (by the corrupted party)

Passive corruption consists of an individual (the corrupted party) seeking to elicit or accepting any form of gain, for him or herself or for another party, so that said individual will carry out or refrain from carrying out an act that falls within his or her job description or is facilitated by his or her position.

All that is required to characterise the offence of passive corruption is the mere seeking of gain, even if the other party does not consent to any request made, as well as the mere acceptance that a form of gain will be provided without said gain actually being provided.

Criminal proceedings may be instigated regardless of whether the form of gain concerned is actually received or whether the act expected in return is carried out.

Supplying any form of gain to reward an act already carried out is prohibited in the same way as supplying any form of gain prior to the performance of the act expected in return.

- Public or private corruption

Most legal systems punish corruption in the private sector (between the employee of a company and a customer of said company) in the same way as they punish the corruption of public officials (between the employee of a company and a member of a state authority for example).

- National or international corruption

Corruption may take place regardless of the nationality of the persons involved (national, international or foreign public officials), and whether the offence (promise, offer, request, payments, etc.) is committed on national or foreign territory.

- Direct or indirect corruption

Gains promised or provided indirectly, through a consultant, a friend, a relation or a company controlled directly or indirectly by the beneficiary of the corruption, are prohibited in the same way as gains promised or provided directly to said beneficiary.

Thus the use of intermediaries or companies, in particular those of a foreign nationality, must be the subject of great caution, as the company may be held liable for reprehensible actions on the part of third parties whose services it may use for the purposes of its activities.

3.3. Definition of influence peddling

Influence peddling is increasingly being made illegal throughout the world. Closely related to corruption, it may take several forms: active or passive, direct or indirect, national or international.

Influence peddling refers to a situation in which an individual wrongfully takes advantage of his or her influence (whether genuine or supposed) to obtain distinctions, employment, deals or a favourable decision, in return for the promise of a form of gain.

3.4. The various forms of influence peddling

- Active influence peddling

Active influence peddling involves offering, promising or providing any form of gain to an individual (whether a public official or a private individual), for themselves or others, in return for the past or future exertion of genuine or supposed influence on a public official, an authority or an administration in order to obtain distinctions, employment, deals or any other favour.

It also consists of accepting any form of gain, or providing said gain to an individual soliciting it, in return for the practice of such influence.

All that is required for the offence of influence peddling to be committed is the mere offering or promising of any form of gain, even if the other party does not accede to it, or the mere agreement to a request.

As a consequence, a criminal conviction may result regardless of whether the form of gain sought is actually provided, whether the supposed influence is practiced, or whether the desired decision or favour is obtained.

- Passive influence peddling

Passive influence peddling takes place when a person (whether a public official or a private individual) seeks or accepts any form of gain, for him or herself or for another party, in return for the past or future wrongful use of genuine or supposed influence on a public official, an authority or an administration in order to obtain distinctions, employment, deals or any other favour.

Just as in the case of corruption, the mere seeking and the mere acceptance of gain even if the other party does not provide said gain is enough to characterise the passive form of this offence.

Thus, criminal proceedings may be instigated regardless of whether the form of gain sought (the contract, deal, gift, etc.) is actually provided, whether influence is actually exerted as desired, or whether the decision or favour is actually obtained.

- National or international influence peddling

Most legal systems prohibit influence peddling by public officials in the country concerned, or by international or foreign public officials.

- Direct or indirect influence peddling

Just as in the area of corruption, gains promised or provided indirectly are prohibited in the same way as gains promised or provided directly.

3.5. Some additional definitions

- The concept of gain is not restricted to the payment of money. The following elements can be described as forms of gain and are commonly known as “bribes”:
 - gifts, meals, entertainment, travel and other forms of hospitality;
 - benefits in kind, such as the use of an apartment or a car;
 - preferential treatment, such as offers of employment or an internship for the corrupted party or a friend of relative of his or hers;
 - a commission, which may in particular take the form of a percentage of the value of the deals or contracts obtained, or a discount on the sale price of an item.
- The service sought in return may for example consist of:
 - The obtaining or renewal of a public contract;
 - The obtaining or renewal of a private contract;
 - The granting of a license or a franchise;
 - The obtaining of official approval;
 - Tax benefits or customs advantages;
 - The disclosure of confidential information to a competing company.
- The term “public official” refers to any individual in a position of public authority, vested with a assignment of public office, or in elected public office, within the national territory, abroad, or within an international organisation.

Said individual may, for example, be the member of a government, a deputy, an employee in a tax authority, a police officer or customs official, a magistrate, a European civil servant, an arbitrator, or a member of an international organisation.

The term “private official” shall in contrast cover any individual who has not been appointed as a public official.

Most legal systems prohibit corruption and influence peddling in all their forms, whether passive or active, direct or indirect, public or private, national or international.

It is up to each of the Company's employees to acquire an understanding of the various forms that these offences may take, in order to avoid acting in a way that may be perceived as subject to such an offence, and to obtain the necessary information regarding the person he or she is doing business with.

3.6. What is at stake in the fight against corruption and influence peddling?

Incidents of corruption or influence peddling leave Dassault Aviation Business Services - and / or its employees guilty of such behaviour - open to very harsh criminal and civil penalties.

In France for example, individuals guilty of corruption or influence peddling may receive prison sentences from 5 to 15 years and fines from 500,000 to 1 million euros, with the amount concerned set at the equivalent of double the amount received from the offence. Additional sanctions (such as a ban on continuing with the professional or social activity in the course of which the offence was committed, or the removal of civic, civil or family rights, etc.) may also be imposed.

Legal entities may receive fines from 2.5 million to 5 million euros, with the amount concerned set at the equivalent of double the amount received from the offence. Additional sanctions (such as a ban on continuing with professional or social activities, the imposition of judicial supervision, the closure of establishments in which the offence was committed, exclusion from bidding for public contracts, a ban on issuing shares, etc.) may also be imposed.

Civil proceedings may also be instigated against the company by victims of the offence.

A conviction for corruption or influence peddling, or indeed mere suspicions in this field, may also have very serious consequences for Dassault Aviation Business Services and its employees, in terms of company image and reputation.

4. Conduct to be adopted in day to day business

4.1. Rejecting all forms of corruption and influence peddling

Company employees must not:

- propose, promise to give, give or agree to give, a gift, a sum of money or any other form of gain, in exchange for - or in the hope of - obtaining a decision, a deal, a contract or a favour of any kind or in return for a decision, a deal, a contract or a favour;
- accept or seek to elicit a gift, a sum of money or any other form of gain that they know or suspect has been promised or offered in exchange for - or in the hope of - obtaining a decision, a deal, a contract or a favour of any kind, or as a reward for a decision, a deal, a contract or a favour;
- propose, promise to give, give or agree to give, a gift, a sum of money or any other form of gain, in exchange for - or in the hope of - an individual wrongfully using his or her influence, whether genuine or supposed, in order to obtain a decision, a deal, a contract or a favour of any kind from a public official, an authority or an administration;
- accept or seek to elicit a gift, a sum of money or any other form of gain that they know or suspect has been promised, requested or offered in exchange for or in the hope of a wrongful use of influence, whether genuine or supposed, in order to obtain a decision, a deal, a contract or a favour of any kind from a public official, an authority or an administration.

4.2. Gifts and hospitality

Gifts and hospitality, whether received or offered, are a form of courtesy that may contribute to ensuring satisfactory business relations.

They may take the form of gifts, meals, travel, or invitations to professional, sporting, cultural, artistic or other events.

These practices vary according to the country, the customs applied there and the nature of the commercial activities. They are not in themselves generally prohibited but may under certain circumstances fall within corruption or influence peddling.

Before providing or receiving such gifts or hospitality, each of the company's employees must ensure that the following conditions have been met:

- they are given without anything being expected in return;
- they are given in a strictly professional context;
- they comply with normal business practice, and are in any case limited and proportionate in terms of value and frequency;
- they have been provided and received in total transparency and recorded as such.

It is in all circumstances strictly forbidden to offer or accept sums of money in the form of cash or in an equivalent form (such as gift vouchers).

Each employee must moreover remain vigilant as to the context in which the gifts and hospitality are being received or offered. They must be avoided in the case of invitations to tender, before a contract is signed, in the course of the administrative procedure during which a license, a permit, or certification is being sought, etc.

Should a gift or hospitality that does not meet the above conditions be offered to one of the company's employees, he or she must decline it and explain that the Company's policy prohibits him or her from accepting it, or else obtain express written and documented authorisation from his or her line manager beforehand.

If the person the employee is dealing with is a public official, said employee must remain especially cautious, ensuring that the applicable laws in the country concerned do not prohibit gifts or hospitality provided to public officials.

4.3. Facilitation payments

Facilitation payments are small and unofficial amounts of money paid out in order to secure or accelerate an administrative procedure. These practices are prohibited under numerous legal systems and tolerated under others.

Under the company's policy, facilitation payments are forbidden.

4.4. Political and religious donations, sponsorship and patronage

- Political and religious donations

The company operates with strict political, religious and philosophical neutrality; it prohibits any funding of political parties, elected representatives or candidates, in compliance with current legislation.

- Sponsorship and patronage

“Patronage” may be defined as providing material, financial or human resources to a project or an organisation of general interest, without seeking anything in return.

“Sponsorship” may be distinguished from patronage in that it consists of material or financial support provided to an organisation in return for a direct benefit.

Potential Dassault Aviation Business Services involvement in patronage and sponsorship operations must take place in compliance with the legislation in force in the countries concerned and with total transparency.

Any of these practices must moreover be carried out in accordance with Dassault Aviation Business Services Values and priorities and within its communications strategy.

Any employee approached for sponsorship or patronage must therefore inform his or her Line Manager, who will decide on the appropriate response.

- Lobbying

“Lobbying” may be defined as an activity consisting of exerting influence on public decision-making, in particular with regard to the contents of a law or a regulatory decision, through communications or dialogue with public officials.

Dassault Aviation Business Services sometimes announces its position on certain matters that are the subject of forthcoming decisions by the public authorities.

Within this context, all that should be contributed is the company's experience and technical expertise, to enable the authorities to reach an informed decision. Said contribution should be made with full transparency and with the sole aim of furthering the satisfactory functioning of our institutions and the efficiency of the laws and regulations.

4.5. Conflicts of interest

A conflict of interest may be defined as a situation in which an individual has personal interests liable to influence the impartial accomplishment of his or her duties and fulfilment of his or her objectives. Conflicts of interest lead to difficult situations in which the independence of the parties may be questioned. Above all they may give rise to corruption or influence peddling.

Company employees must therefore do everything possible to identify any situations in which conflicts of interest may arise for them and inform their line managers so that the latter can implement the appropriate actions.

The acquisition by Company employees of direct or indirect interests in a client or supplier is prohibited.

4.6. If in doubt, what steps to take

It is up to each of the Company's employees, when faced with uncertainty as to the conduct he or she should adopt in carrying out his or her activities, to refer to this Code or to seek advice from his or her Managers, from the President or from the Ethics Compliance Officer.

5. Anti-corruption scheme

The anti-corruption scheme adopted and set up by the company, with this Code as its backbone, is made up of the following elements:

5.1. A dedicated structure

The Company has set up a dedicated organisation, tasked with defining and implementing the policy drawn up to prevent and detect corruption and influence peddling. It is also tasked to check the efficiency and relevance of this scheme.

The Ethics Compliance Officer is independent, reports directly to the President and has the necessary skills and means to ensure implementation of, and compliance with, the Company's scheme.

5.2. Mapping out the risks

Dassault Aviation Business Services has a risk-mapping document, which is regularly updated and identifies and ranks the operational risks for each of its major departments. The risks relating to corruption and influence peddling are identified, in particular for each of the activities and geographical areas concerned.

5.3. A Training system

The Company organises training sessions designed to raise the most exposed employees' awareness of the risks of corruption and influence peddling, and to provide them with the necessary good habits to prevent such risks.

5.4. Procedures for validating the situation of clients, major suppliers and intermediaries

When signing contracts with major clients or major suppliers, the Company follows an assessment procedure tailored to reflect the risk-mapping for corruption and influence peddling and requesting in particular due-diligence prior, such as requesting assessment and commitments from these third parties.

Likewise, the use of intermediaries is subject to strict selection, assessment and validation procedures.

5.5. Procedures for the verification and monitoring of accounts, and for internal auditing

The Ethics Compliance Officer is tasked with the following up of the scheme set up in order to ensure its efficiency and relevance. The Ethics Compliance Officer reports to the President.

Within their respective liabilities, the company's CFO and the external financial auditors ensure particularly that the Company is not subject to any irregularity in accounts that may indicate occurrences of corruption or influence peddling.

5.6. Whistleblowing Scheme

The Company's employees are provided with an internal Whistleblowing process, enabling them to report, in a disinterested manner and in good faith, using a dedicated email address, any non-compliance with the Code that they may directly witness.

The Company's employees may also use this scheme to report any crimes or misdemeanours, any serious and clear infringements of international commitments or of laws or regulations, or any threats or serious damage, of which they may become personally aware.

This "right to whistleblow" must be performed in compliance with the applicable laws and with the company's Internal Alert scheme.

Dassault Aviation Business Services ensures strict confidentiality of the information received and prohibits discriminatory measures against any individuals exercising their right to whistleblow in good faith.

Geneva, July 7th, 2021

A handwritten signature in blue ink, consisting of a large, stylized initial 'F' followed by a series of loops and a long horizontal stroke extending to the right.

Franck Madignier
President