

THALES ITALIA S.p.A., aware that the phenomenon of corruption represents an obstacle to economic, political and social development and a distortion of the rules, fairness and transparency of the markets, adopts a **"zero tolerance"** approach towards all corrupt practices and assumes the commitment to guarantee actions and behaviors based exclusively on criteria of transparency, correctness and moral integrity, which prevent any attempt at corruption.

For this purpose, **THALES ITALIA S.p.A.** undertakes to comply with the principles of the Code of Ethics and its Organization, Management and Control Model adopted pursuant to Legislative Decree 8 June 2001, n. 231, which, together with the Codes of Ethics and Conduct and the Policies of the Thales Group, constitute the pillars of its Management System for the Prevention of Corruption, pursuant to UNI ISO 37001: 2016.

The Top Management of **THALES ITALIA S.p.A.** is firmly convinced that its commitment to preventing and fighting corruption can positively influence its relations with Stakeholders and Business Partners, thus guaranteeing a progressive dissemination of ethical and social principles and values to a greater sphere of stakeholders.

Therefore, **THALES ITALIA S.p.A.**, in line with this *vision*, the strategic guidelines also of the Thales Group, its founding values, the scope of the Corruption Prevention Management System, the purposes and the context in which it operates, the results of the risk assessment, formulates its own Anti-Corruption Policy, formally undertaking the commitment to:

- define a strategic reference framework to set, review and achieve the objectives for the prevention of any kind and form of corruption;
- adopt and implement a Management System for the Prevention of Corruption in compliance with the UNI ISO 37001: 2016 standard, as a safeguard and tool for the continuous improvement of its performance against corruption;
- comply with international and national laws, other laws and requirements in force regarding the prevention of corruption;
- adapt this document to the regulatory changes in the sector, the context of the organization and the field of application, as well as the needs arising from the requirements and performance of its Management System for the Prevention of Corruption.

THALES ITALIA S.p.A. also undertakes to pursue the following general objectives:

- absolute prohibition to engage in conduct that could be configured as corruption or attempted corruption, adopting a "zero tolerance" approach;
- Strict compliance with current legislation on the prevention and fight against corruption, in Italy and in any country **THALES ITALIA S.p.A.** is found to operate, with the involvement of employees, collaborators in any capacity, and all subjects who operate for and / or under the control of **THALES ITALIA S.p.A.**;
- implementation and constant updating of the UNI ISO 37001: 2016 System in order to guarantee a continuous improvement of its performance in consideration of the needs deriving from the requirements defined in the Management System for the Prevention of Corruption;
- encouragement of reporting in good faith of possible corruptive actions, or on the basis of a reasonable and confidential conviction, by providing employees and Stakeholders with the tools to report behavior that is not in line with company policies and protecting the whistleblowers from any retaliation;
- raising awareness and training of its employees on the issues of preventing corruption;
- raising the awareness of all interested parties on the aforementioned anti-corruption issues, giving them visibility through appropriate forms of advertising;
- publication of this Policy, accessible to all company levels and to the interested parties involved and suitable information in the appropriate languages;
- pursuit of any conduct that does not comply with this Policy, with the application of the corporate sanction system, in accordance with the provisions of the Disciplinary System referred to in the Organizational Model adopted, in accordance with the Company Policies and in full compliance with the applicable legislation.

In order to ensure a correct and effective implementation of the Corruption Prevention Management System adopted, **THALES ITALIA S.p.A.** has identified an **Anti-Corruption Compliance Function**, which in terms of skills, status, authority and independence, is adequate for the performance of the assignment, as well as guarantor and interface to Stakeholders in the application of the System.

Whistleblowing

The Anti-Corruption Policy of **THALES ITALIA S.p.A.** provides the possibility of sending **Reports** concerning facts and / or behaviors, of which one has become aware due to the relationships in place with the Company, considered illegal or violations as they are contrary to the law, this Policy, the ethical principles and applicable internal regulations of Thales Italia and the Group. In particular, with reference to the prevention of corruption, the procedure for the management of Whistleblowing Reports:

- allows the internal and external personnel of the Company to report in good faith or on the basis of a reasonable belief attempted, alleged and actual acts of corruption, or any violation or deficiency concerning the Management System for the Prevention of Corruption of **THALES ITALIA S.p.A.** to the Surveillance Committee of the Company;

- provides the application of the corporate disciplinary system towards those who violate the relevant laws (Legislative Decree n. 24/2023) and, in particular, towards those who violate the protection measures of the Whistleblower or the Whistleblower deemed responsible of calumny or defamation;
- prohibits retaliation and protects those who make Reports in good faith from retaliation.

The internal and external subjects of **THALES ITALIA S.p.A.** have the opportunity to report, even anonymously, any suspicions of a corruption event or attempted corruption to the "Thales Alert Line" platform to which it is possible to log in clicking on one of the following links:

Intranet link:

<https://intranet.peopleonline.corp.thales/sites/functions/support-functions/ethics-integrity-and-corporate-responsibility/anti-corruption-compliance-and-influence-peddling-programme/internal-alert-system>

Internet link for external users:

<https://thales.integrityline.org/>

Alternatively, it is possible to report, also anonymously, any suspicions of a corrupt event or attempts to corrupt by ordinary or registered mail, to be sent in a double sealed envelope, to the headquarters of Thales Italia, Via Lucchese, 33, 50019 Osmannoro, Florence, addressed to the confidential attention of the Surveillance Committee.

Besides, both internal and external subjects of the Company can orally send the report through the vocal messaging system included in the web platform, as well as by requesting a direct meeting to the Surveillance Committee through the said channels (mail or platform).

It should be noted that anonymous Reports will be taken into consideration only in cases in which they indicate sufficient and circumstantial factual elements, such as to guarantee the relative recipient as complete information as possible about the fact or behavior that is the subject of the Report.

The Top Management of **THALES ITALIA S.p.A.** makes all human and economic resources available in order to allow the achievement and maintenance of the performance of corruption prevention, in compliance with the reference standard.

Sesto Fiorentino (FI), July 15th, 2023


THALES ITALIA S.p.A.
Managing Director
Donato Amoroso