

Responsible Lobbying Charter

The purpose of this Charter for Responsible Lobbying is to reiterate the rules and commitments to comply with in the conduct of Lobbying activities (or interest representation activities) by Thales or on behalf of Thales, namely in the frame of associations or professional bodies .

The term Lobbying (or interest representation) refers to actions seeking to influence the content of a law or a regulatory instrument, through contacts with the public decision-makers (in particular, members of the government and ministerial cabinets), members of parliament, public officials from central, federal or territorial administration, etc.) (hereinafter "Public Decision-Makers").

As part of these Lobbying activities, Thales undertakes, in compliance with applicable regulations¹, actions to promote and inform Public Decision-Makers of the Group's positions, through written or oral communication, in order to inform them of the consequences and practical scope of legislation in force or under consideration.

This Charter for Responsible Lobbying is part of the Group's Integrity and Compliance Program. Lobbying activities may indeed constitute acts of corruption or influence peddling if the persons in charge of these activities, directly or indirectly, offer, promise or grant undue advantages to a Public Decision-Maker (or one of his relatives), in order to influence a decision. The rules defined by the present Charter, which aim at ensuring transparency and integrity in the implementation of these activities, thus contribute to prevent the risk of corruption and influence peddling.

These rules supplement the provisions of the Code of Ethics and the Code of Conduct for the Prevention of Corruption and Influence peddling (available among other on the Thales website) as well as all the procedures of the Integrity and Compliance Program that may be applicable in the area of Lobbying, in particular approval procedures for gifts or hospitality and for community investments, sponsorship and memberships, the procedure for assessing the integrity of third parties when using a public affairs consulting firm, and the policy for preventing, detecting and managing conflicts of interest.

This Charter is applicable to Thales and its subsidiaries as legal entities and to any employee who carries out Lobbying activities on behalf of the Group, in France or abroad. This activity may be carried out by a Group employee whose responsibilities include a "institutional relations" or "public affairs" role, but also by any employee who has a relationship with a Public Decision-Maker. It may also be entrusted to a public affairs consulting firm, which shall adhere to the provisions of this Charter.

¹ For example, in France, Thales carries out its lobbying activities in compliance with the regulations in force, in particular the provisions of Article 25 of the French law n°2016-1691 of December 9, 2016 on transparency, the fight against corruption and modernization of the economy (known as the Sapin II Law), which aims to ensure transparency in relations between interest representatives and the French public authorities, as well as any applicable local regulations in this regard.

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The Group is committed to carrying out these lobbying activities transparently and with integrity and in particular to:

- Implement a zero tolerance towards corruption and influence peddling in application of its Code of Ethics and its Code of Conduct on the Prevention of Corruption and Influence Peddling;
- Comply with national regulations, deontological rules and the regulations of the institutions with which The Group is in contact;
- Register on the lists of interest representatives of the institutions in which it carries out lobbying activities in compliance with the applicable regulations;
- Refrain from funding political activities, even in countries where such funding is authorized and regulated by law, and uphold the principle of political neutrality;
- Promote responsible lobbying best practices;
- Implement a zero tolerance towards corruption and influence peddling in application of its Code of Ethics and its Code of Conduct on the Prevention of Corruption and Influence Peddling;
- Refrain from having persons discharging public responsibilities acting in its name through specific contracts for the Group's interests representation.

Thales employees in charge of interests representation must:

- Act in a transparent manner, and in particular :**
 - Conduct this activity in a purely professional framework;
 - Declare their identity and specify the Thales entity they represent;
 - Register on the lists of interest representatives of the institutions in which it carries out lobbying activities in compliance with the applicable regulations. In the absence of specific regulations, the Group strongly recommends that employees who carry out permanent or regular interest representation activities voluntarily register on the lists or directories set up by these institutions (e.g.: the European Union Transparency Register);
 - Ensure the quality, reliability and traceability of information and documents transmitted to Public Decision-Makers;
 - Implement strictly the internal procedures established by the Group's entities to comply with their obligations to publish information on their interest representation activities, in accordance with the regulations applicable to them;

- Act with integrity, and in particular :**
 - Comply with national regulations, deontological rules and regulations of the institutions with which the Group is in contact;
 - Comply with the provisions of the Code of Conduct – Prevention of the Corruption and Influence Peddling and related instructions, namely the Group Instruction Gifts and Hospitality in their relations with a Public Decision-Maker (or one of his or her relatives);
 - Refrain from approaching a Public Decision-Maker in order to obtain information or decisions by fraudulent means;

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- Refrain from offering, promising or granting an undue advantage to a Public Decision-Maker in order to obtain information or decisions issued in the Group's interests;
- Abstain from organizing conferences or events in which the terms and conditions for a Public Decision-Maker (or one of his or her relatives) to speak depend on the payment of a fee.

This Charter is made available to employees who are likely to carry out a Lobbying action for the benefit of the Group and to external service providers in public affairs retained by the Group.

In case of doubt, please contact:

- For any question relating to Lobbying activities with the French public authorities, the Institutional Relations Department or, if required, the Public Affairs Department of the Thales entity concerned;
- For any question relating to Lobbying activities with the European Union, the Department in charge of Institutional Relations with the European Union;
- For any question relating to Lobbying activities with the public authorities of countries other than France, the Public Affairs Department of the country in question, when it exists, or the Chief Compliance Officer/Compliance Officer in charge of the country in question.

The list of Chief Compliance Officers/Compliance Officers is available on the intranet site of the Legal and Contracts Department and of the Ethics, Integrity and Corporate Responsibility Department.

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