

# **Professional Ethics & Compliance Code of Conduct**



## Compliance with laws and regulations

Chantiers de l'Atlantique's aim is to act, under all circumstances, in accordance with the laws and regulations in force in all the countries in which the company operates.

Chantiers de l'Atlantique is committed to ensuring that all its administrators, senior managers and employees conduct themselves with honesty and in accordance with the laws and regulations in force concerning, in particular, human rights, health and safety, environmental protection and corruption prevention, as well as those concerning competition and fiscal and financial regulations

## Implementation of an ethics and integrity policy

Chantiers de l'Atlantique has implemented a code of conduct designed to accompany the company's strategic and operational decisions on a daily basis.

This code lays down the principles, values and standards that must guide the actions and behaviour of Chantiers de l'Atlantique and of all the company's administrators, senior managers and employees, both internally and with regard to third parties. These rules do not under any circumstances replace the laws and regulations in force.

Chantiers de l'Atlantique has established an "Ethics and Compliance" steering committee to monitor the arrangements implemented and ensure that they comply with the company's ethical principles, values and standards. This steering committee is responsible for regularly updating the mapping of corruption risks, the applicable procedures and training plans for use by employees.

Chantiers de l'Atlantique undertakes to require all administrators, senior managers and employees to comply with these rules and procedures and, in particular, those aimed at preventing all forms of corruption, either passive or active, of public or private officials in the form of facilitation payments, gifts, rewards, invitations or other considerations aimed at third parties.

Chantiers de l'Atlantique undertakes to encourage ethical behaviour within its organization.

## Commitments with regard to business partners

Chantiers de l'Atlantique wants to establish sustainable relations with all its business partners. It undertakes to act in an honest, sincere and transparent manner in all its dealings with them. These relations are based on confidence and mutual respect in order to encourage innovation and performance at all levels of the value chain.

Chantiers de l'Atlantique undertakes to take its customers' specifications into account and to submit clear, precise bids that meet their requirements.

Chantiers de l'Atlantique undertakes to communicate clear and precise information to its co-contractors.

Chantiers de l'Atlantique undertakes to develop and propose products that comply with current standards and with the quality requirements that the company has set itself.

Chantiers de l'Atlantique undertakes to comply with the internal selection rules and those applicable to the management of relations with its co-contractors.

Chantiers de l'Atlantique undertakes to treat co-contractors in an equitable and objective manner in competitive bidding.

Chantiers de l'Atlantique undertakes to encourage cooperation between co-contractors in order to promote the development of compliant products and systems that benefit all parties in terms of cost, quality and lead-times.

Chantiers de l'Atlantique undertakes to meet the commitments made with regard to its co-contractors.



Chantiers de l'Atlantique undertakes to maintain a constructive dialogue with all its partners on social and environmental questions and those concerning ethics and integrity in business relations.

Chantiers de l'Atlantique undertakes to respect the materiel and technological assets of its business partners.

Chantiers de l'Atlantique undertakes never to behave in a dishonest manner towards its competitors.

## **Employee relations**

Chantiers de l'Atlantique is deeply committed to the principles of the Universal Declaration of Human Rights and to the principles of equal treatment and opportunities.

Chantiers de l'Atlantique promotes equality of opportunities and places the fight against all forms of discrimination at the heart of its human resources management policy, whether associated with origins, lifestyle, gender, age, political or religious opinions, trades union membership or disabilities. It implements selection and human resources management processes that are transparent, objective and traceable.

In order to guarantee the safety and protection of their personal data, the access rights to personal data are restricted and the gathering of personal data is limited to the strict minimum required for their employment and any consequent benefits.

Finally, Chantiers de l'Atlantique undertakes to provide a working environment that complies with the legal provisions in force concerning matters of health and safety and the environment, the prevention of health and occupational risks and personnel training.

Chantiers de l'Atlantique undertakes to require the company's employees to adhere to all the provisions that contribute to the development of the company's values.

## **Relations with the media and social networks**

Chantiers de l'Atlantique takes great care to ensure that its image, organization, values and products are respected. All unauthorized communication of information may affect its reputation and seriously harm the company's interests and those of its shareholders.

Relations with the media and social networks are the responsibility of the Communication Department. All declarations or replies to questions from the media or via social networks must pass through, or be coordinated by, the communication department. Relations with shareholders are the exclusive responsibility of the company's General Management.

All Chantiers de l'Atlantique employees undertake to observe total discretion concerning Chantiers de l'Atlantique's activities and, under all circumstances, to abstain from making any statements that could harm the reputation of Chantiers de l'Atlantique or the integrity of its property or the confidentiality of its information.

The publication of photos, videos or other information relating to the company's activities or products is forbidden unless prior written authorization has been received from the Communication Department. All unauthorized publication or distribution renders the employee breaking this rule responsible for his actions.

## **Respecting of Chantiers de l'Atlantique's assets and know-how**

It is essential to protect Chantiers de l'Atlantique's tangible and intangible assets in order to strengthen the company's competitiveness and assure the long-term success of its activities.

The administrators, senior managers and employees of Chantiers de l'Atlantique undertake to promote, enhance and protect all the company's property, including its intellectual property rights, and to protect Chantiers de l'Atlantique's confidential information.

They shall take care, on a reciprocal basis, not to jeopardize other people's property.



## **Social and environmental responsibility**

Chantiers de l'Atlantique prioritizes the maintenance and development of a responsible attitude, both collective and individual, in the fields of health and safety in the workplace. Its aim is to strictly apply regulations and establish elaborate risk prevention and management processes, training activities and tools and methods for measuring the efficiency and performance of its actions.

Chantiers de l'Atlantique also places environmental thinking at the heart of its innovations. Eco-design, energy management, on-board water management, the reduction of emissions into the air and waste management are the main strands of the R&D programme that it has been implementing for many years.

The improvement of the company's productivity, through improvements in the working conditions of its employees and co-producers, is also at the heart of its concerns.

Aware of the challenges and its local, regional and international outreach, Chantiers de l'Atlantique also makes a major contribution to important actions in the fields of education, training and research. It supports the economic development of local companies and aims to promote the development of the sector.

## **Truthfulness of accounting and financial information**

The transparency and truthfulness of accounts is an essential element in gaining the confidence of all its partners and guaranteeing that business is conducted in accordance with the laws, accounting principles and other financial standards in force.

Chantiers de l'Atlantique therefore accounts rigorously and accurately for all its transactions and assets.

It establishes internal control rules and checks to ensure that these rules are complied with by all the company's employees.

Chantiers de l'Atlantique ensures that the company's accounting and financial information is presented in an honest and efficient manner and checks that the accounting and financial information and forecasts are accurate and sincere and communicated with integrity and transparency.

## **Conflicts of interest – Integrity and loyalty of employees**

Chantiers de l'Atlantique attaches fundamental importance to the ethical behaviour of its employees and checks to ensure that they comply with the rules in the Professional Ethics and Compliance Code of Conduct established within the company's organization.

Chantiers de l'Atlantique checks to ensure that, by their behaviour and decisions, its employees contribute to the good reputation of Chantiers de l'Atlantique. It is up to them to behave in the interests of Chantiers de l'Atlantique and defend its values.

Chantiers de l'Atlantique's employees shall only use Chantiers de l'Atlantique's resources and information to the exclusive benefit of Chantiers de l'Atlantique.

They shall take care to ensure that their behaviour and decisions are free from personal conflicts of interest and shall be subject to the requirement to declare all conflicts of interest that may exist with the Chantiers de l'Atlantique's co-contractors, in accordance with the rules in force within the company.

Any participation on their part in associations or politics must be compatible with their professional responsibilities and with the neutrality observed by Chantiers de l'Atlantique in matters related to politics, religion and philosophy. These activities must be carried out within a totally private context and must not interfere in any way with professional activities.



## **Gifts and hospitality**

The question of gifts or hospitality received or offered must under no circumstances influence business decisions and company policy. That is why employees undertake to comply with the Gifts and Invitations policy laid down by Chantiers de l'Atlantique and agree to adopt prudent and irreproachable behaviour with regard to these questions. Any doubts or questions must be drawn to the attention of the line manager concerned.

## **Sanctions for failing to comply with the code of conduct**

Any violation of this Code of Conduct compromises the relationship of trust established between the company and the person that fails to comply with the rules.

All administrators, senior managers and employees must comply strictly and rigorously with the Code in the conduct of their business, in their managerial relationships and with regard to all the company's stakeholders. Any infringement shall render the person responsible liable to disciplinary sanctions and/or legal proceedings.

