FINAL ASSESSMENT
DASSAULT AVIATION

The following pages contain the detailed scoring for your company based on public information.

The following table represents a summary of your scores:

<table>
<thead>
<tr>
<th>Topic</th>
<th>Number of questions</th>
<th>% score based on public information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leadership, Governance and Organisation</td>
<td>10</td>
<td>20%</td>
</tr>
<tr>
<td>Risk Management</td>
<td>7</td>
<td>0%</td>
</tr>
<tr>
<td>Company Policy and Codes</td>
<td>12</td>
<td>33.3%</td>
</tr>
<tr>
<td>Training</td>
<td>5</td>
<td>0%</td>
</tr>
<tr>
<td>Personnel and Helplines</td>
<td>7</td>
<td>0%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>41</strong></td>
<td><strong>14.6%</strong></td>
</tr>
</tbody>
</table>
A1:
Does the company publish a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company?

Score:

1

Comments:
Based on public information, there is evidence that the company publishes a statement from the Chief Executive Officer and Chair of the Board supporting the ethics agenda of the company. This appears as the preface to the Ethical Charter and the same statement is also on the website. No specific mention is made of anti-corruption within this statement. The company therefore scores 1.

References:
Public:
Company Website: Ethical Charter
‘Message from the Chairman & Chief Executive Officer
Founded almost a century ago, the Dassault Aviation Group is now one of the world’s major players in civil and military aeronautics.
Renowned for its technical and industrial expertise, buttressed by employees who are passionate about what they do, offering outstanding products, innovative processes and working in synergy with its partners, the Group looks to the future with confidence.
The Dassault Aviation Group also nurtures and projects a clear identity, strong values and strict ethical principles.
Since 2001, the Group has stated these principles in this very document, its Ethical Charter. The Charter comprises two sections.
The first section is entitled “Our values” and describes our five main guiding principles. The second section is called “Our code of conduct” which pragmatically illustrates daily conduct flowing from these values.
The Ethical Charter aims to rally the men and women in our Group around these values and is intended to inspire their actions and convey Dassault Aviation’s image to our customers, partners and suppliers.
| This Charter represents a collective commitment which will come into its own as long as everyone is on board.  
Higher together!  
Éric Trappier’
| TI notes that this same statement also features as the preface to the Ethical Charter (2013), p.1:
A2:
Does the company’s Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company’s Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company. TI notes that the CEO sits on the ASD Board, but there is no evidence that this role directly involves ethics and anti-corruption initiatives.

References:
Public:
TI notes:
Company website: ASD Governance
‘Eric Trappier, CEO of Dassault Aviation’.
http://www.asd-europe.org/about-us/structure/asd-governance/
A3:
Does the company’s Chief Executive Officer demonstrate a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company’s Chief Executive Officer demonstrates a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure.

References:
Public:
NA
A4: Does the company publish a statement of values or principles representing high standards of business conduct, including honesty, trust, transparency, openness, integrity and accountability?

Score: 1

Comments: Based on public information, there is evidence that the company publishes a statement of values representing high standards of business conduct, in particular integrity. The company provides details about this value and demonstrates that it forms part of its policies. To score higher the company would need to provide evidence of other values representing high standards of business conduct.

References:
Public:
Company Website: “Values

Shared Values
In a context of economic globalization and strong international competition, we build on a powerful identity and a strict entreprise culture. Our ethical charter expresses the essential values that guide everything we do.

Customer-minded
Customer satisfaction is both our philosophy and guiding principle. Knowing how to listen to customers, understanding their needs, be at their service, and keep our word constitute the number-one priority for every employee at Dassault Aviation.

We offer our customers excellent technical performance, confidentiality and customized follow-up, while optimizing cost-control and lead times.

Strict ethical business standards
We respect our contractual commitments (costs, deadlines and performance).

We act in compliance with all anti-corruption and export-control legislation. Ethics and integrity are values that we espouse daily in our procedures and in our behavior.
Dassault Aviation is a signatory to European and international commitments to loyal practices in international trade (CIS, Global Principles).

Human qualities
People are the heart of the Group.
We promote team spirit, the sharing of knowledge and know-how, creative initiative, and a sense of morality.
We favor dialogue at all levels, mutual respect, the quest for professional self-fulfillment, and the sense of belonging to a group that remains human in scope.

Technological excellence and innovation
Technological excellence and innovation are the basis of our spirit, our passion and our history.
We ensure the quality, reliability, and safety of our aircraft through a strategy of constant innovation, our project management capability, and our mastery of complex systems.
We care about managing and reducing the impact of our activities and products on the environment.

Economic performance
We regard value creation as an essential goal; it guarantees our profitability, financial stability and long-term future.
In a context of intense international competition, we are driven by the need to be more flexible, adaptable and responsive in dealings with our customers, suppliers and partners.

Openness to the world
In a spirit of partnership, we are engaged in long-term scientific, technological, technical, and industrial joint ventures, both in France and abroad.
We play an active role within national and international aeronautical and defense organizations.
Our internal and external communication is both open and transparent.”


TI notes that the company values are outlined in the Ethical Charter (2013), pp.2-4:
“Our Code of Conduct translates the 5 professional and ethical values expressed by the Dassault Aviation Group into pragmatic and operational terms. Its purpose is to unite the Group’s personnel around these principles. The code of conduct is both a collective commitment and an individual imperative. It does not substitute for the national and international legislation in force. It is not a contractual document, but an ethical commitment which must be known and applied by all.
It focuses on 5 key values.”

DASSAULT AVIATION 01/09/14
HTTP://WWW.DASSAULT-AVIATION.COM/FR/
HTTP://WWW.DASSAULT-AVIATION.COM/EN/
Ethical Charter (2013), p. 9:
“As information becomes more global in nature, the Dassault Aviation Group has acquired means of communication, internal and external, that favor constructive dialogue, trust, and transparency.

... In the business world, it takes care to act in conformity with laws, regulations, and established practices, in a spirit of integrity, ethics, and professionalism.”


Annual Report (2013), p. 26:
« Strict ethical business standards
We respect our contractual commitments (costs, deadlines and performance). We act in compliance with all anti-corruption and export-control legislation. Ethics and integrity are values that we espouse daily in our procedures and in our behavior.

A5:
Does the company belong to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption?

Score:

2

Comments:
Based on public information, there is evidence that the company is a signatory to the UN Global Compact, a member of IFBEC, and a signatory to the ASD Common Industry Standards.

References:
Public:
Company Website:
«Global Compact
Pacte mondial
Evolving in a globalized and strongly competitive environment, Dassault Aviation has asserted its values, identity and ethics in the company’s Ethical Charter.
As a responsible corporate citizen, the company has integrated the social, human, economic and environmental dimensions of its operations into relations with partners and staff, and strives for constant improvements and sustainable business growth.
In addition, since 2003 Dassault Aviation has been one of the first companies to join the Global Compact, the initiative launched by United Nations Secretary-General, Kofi Annan, to federate businesses, public organizations and civil society around ten principles in favor of a more viable and open economy.
While ensuring respect for these principles, Dassault Aviation also promotes them in its corporate documents (annual report, contracts to name a few) and among partners. Each year on the Global Compact website, the company describes its best practices as a concrete illustration of the Global Compact principles.»

«IFBEC
Dassault Aviation joined the IFBEC (international Forum of Business Ethical Conduct) in July 2012.

The purpose of IFBEC is to:

a. Promote and foster through the Global Principles the development of global, industry-wide ethical standards for the companies that are active in the aerospace and defense business sector.

b. Organize opportunities for industry and relevant stakeholders to exchange information and best practices concerning ethical business challenges, practices and opportunities worldwide.


«Common Industry Standards
ASD Common Industry Standards
Out of concern for good governance, ethics and fair competition in international trade, Dassault Aviation instigated the creation of a committee, within the ASD (Aerospace and Defense Industries Association of Europe), which is in charge of developing ethical standards for acceptance and adoption by all European companies in the sector.

These standards, called Common Industry Standards (CIS), were approved in June 2007 by the Board of the ASD, chaired by Charles Edelstenne, and were sent out to all European trade associations and unions in the aerospace industry.

They were signed by the French aerospace industries association GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales), chaired by Charles Edelstenne, and by Dassault Aviation on 10 July 2008.

The GIFAS disseminates and promotes these standards and, in the past year, French companies have, by far, been the most active in accepting them. The Common Industry Standards are now ready for international dissemination, in order to be accepted by the greatest possible number of companies in the aerospace industry.

A6: Has the company appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda?

Score: 0

Comments:
Based on public information, there is no readily available evidence that the company has appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda. The Audit Committee appears to oversee the Internal Audit Department which audits ethical issues, but does not seem to hold overall corporate responsibility for the agenda.

References:
Public:
TI notes:
Annual Report (2013), p.110:
“The Audit Committee is responsible for monitoring:
- procedures for preparing financial information,
- the quality of the risk management and internal auditing systems,
- the auditing of the company and consolidated financial statements by the Statutory Auditors,
- the independence of the statutory auditors.”

(p.113):
“2.1 Internal auditing objectives
The Company’s internal auditing procedures are intended to:
- ensure that operations and management acts as well as staff conduct fall within the framework defined by Senior Management, applicable laws and regulations, and the Company’s internal values and rules,
- verify that the information provided and communications addressed to the Board of Directors and to the AGMs are reliable and give a true and fair view of the Company’s
One of the main purposes of the internal auditing system is to anticipate and manage the risks resulting from the Company’s activity and risks of error or fraud, particularly with respect to finance and accounting. However, as with any control system, it cannot provide absolute assurance that these have been totally eliminated.

...The Company’s internal auditing is based on the following reference documents:
- the Ethical Charter, which defines our values and code of conduct,
- the Quality Manual, which describes the Company processes,
- the Organization Manual, which describes the tasks and organization of each department, - for financial or accounting activities, the economic and financial data management procedure defined in the Quality Manual.”

(p.115): “The Internal Auditing Department, which reports back to Senior Management, is assigned with evaluating the risk management and internal auditing processes.

The Internal Audit Director reports to Senior Management on the results of the audits and the recommendations implemented. He also submits for the latter's approval the internal audit plan prior to its implementation.

The Audit Committee meets with the Internal Audit Director and takes note of the audit plan and of the conclusions of the audits.”

A7:
Has the company appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda, and who has a direct reporting line to the Board?

Score:
0

Comments:
Based on public information, there is insufficient evidence that the company has appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda. The company has an Ethics and Compliance Advisor to the Chairman and the Chief Executive Officer, identified as Jacqueline Meyson. However, evidence does not show that she has clearly been assigned with responsibility for implementing the company’s ethics and anti-corruption agenda.

References:
Public:
TI notes:
Company website: Ethical Charter
‘Contact:
Jacqueline Meyson
Advisor to the Chairman and Chief Executive Officer
Ethics and Compliance’.

Company website: Global Compact
‘Contact: Jacqueline Meyson, advisor to the CEO’.
A8:  
Is there regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda?

Score:  
0  

Comments:  
Based on public information, there is no readily available evidence of regular Board level monitoring and review of the performance of the company's ethics and anti-corruption agenda.

References:  
Public:  
TI notes:  
Annual Report (2013), p.110:  
“The Audit Committee is responsible for monitoring:  
- procedures for preparing financial information,  
- the quality of the risk management and internal auditing systems,  
- the auditing of the company and consolidated financial statements by the Statutory Auditors,  
- the independence of the statutory auditors.”

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The Company’s internal auditing procedures are intended to:  
- ensure that operations and management acts as well as staff conduct fall within the framework defined by Senior Management, applicable laws and regulations, and the Company’s internal values and rules,  
- verify that the information provided and communications addressed to the Board of Directors and to the AGMs are reliable and give a true and fair view of the Company’s activity.  
One of the main purposes of the internal auditing system is to anticipate and manage the
risks resulting from the Company’s activity and risks of error or fraud, particularly with respect to finance and accounting. However, as with any control system, it cannot provide absolute assurance that these have been totally eliminated.

...The Company’s internal auditing is based on the following reference documents:
- the Ethical Charter, which defines our values and code of conduct,
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- the Organization Manual, which describes the tasks and organization of each department,
- for financial or accounting activities, the economic and financial data management procedure defined in the Quality Manual.”

(p.115): “The Internal Auditing Department, which reports back to Senior Management, is assigned with evaluating the risk management and internal auditing processes.

The Internal Audit Director reports to Senior Management on the results of the audits and the recommendations implemented. He also submits for the latter's approval the internal audit plan prior to its implementation.

The Audit Committee meets with the Internal Audit Director and takes note of the audit plan and of the conclusions of the audits.”

A8(a):
Is there a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and evidence of improvement plans being implemented when issues are identified?

Score:
0

Comments:
Based on public information, there is no readily available evidence that there is a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and no evidence of improvement plans being implemented when issues are identified.

References:
Public:
NA
A9:
Does the company have a formal process for review and where appropriate update its policies and practices in response to actual or alleged instances of corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a formal process for review and where appropriate updates its policies and practices in response to actual or alleged instances of corruption.

References:
Public:
NA
A9(a):
Does the company have a formal anti-corruption risk assessment procedure implemented enterprise-wide?

Score:
0

Comments:
Based on public information, there is evidence that the company has a formal risk management mechanism. However, it is not clear that this includes an anti-corruption risk assessment.

References:
Public:
TI notes:
About the Group:

1.5.2 Risks related to the Supply Chain

We need to manage the risks in procurement (analysis and selection process for suppliers, monitoring of critical suppliers, timely delivery) to avoid a disruption in our production lines. We are vigilant regarding the risks of failure of our suppliers.

(115-116):
«2.3 Risk management procedures
The risk management mechanism, detailed in Chapter 1.5 of the Directors' report, is based on risks mapping that is updated by each of the major company departments for the activities concerning them.
The risks identified in this mapping, whatever their nature, have been assessed according to their seriousness and their frequency of occurrence. The procedures for treating major risks are also recorded in this mapping.
More particularly, risk management at DASSAULT AVIATION is based on the following approach:

- identifying critical risks per program,
- risk analysis (assessment and prioritization),
- treatment of risks.

Risks are primarily identified through regular critical risk reviews held in conjunction with program management, operational management and site management. Risks are monitored at the various stages in a product’s life cycle based on various reviews. The purpose of these reviews is to identify new critical risks and monitor and reduce existing risks. The Risk Management Department notifies Executive Management by transmitting the list of critical risks identified. The risk management procedures are defined and applied by the various Departments of the Company.

For the supply chain risks, the DGIA (Industrial Operations and Purchasing Department) has put in place a reference system for reducing the risk of shortages on the production line and supplier defaulting.

...Lastly, in 2011 the Company created a Risks Committee. Its mission, based on the risks-mapping and any other relevant factors, is to:

- validate the identified risks, their classification and the risk-reduction actions carried out,
- ensure that new risks are identified, taken into account and their financial impacts measured. To this end, the Committee conducts interviews with those in charge of the Company processes, responsible for updating the risks map.

It also ensures that the risk management mechanism is taken into account in the subsidiaries. It is presided over by the Executive Vice-President for Total Quality, and reports back to Executive Management.”

A10:
Does the company have a formal anti-corruption risk assessment procedure for assessing proposed business decisions, with clear requirements on the circumstances under which such a procedure should be applied?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure for assessing proposed business decisions.

References:
Public:
NA
A11:
Does the company conduct due diligence that minimises corruption risk when selecting or reappointing its agents?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company conducts due diligence that minimises corruption risk when selecting or reappointing its agents.

References:
Public:
NA
A12:

Does the company have contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption.

References:

Public:
NA
A13:
Does the company make clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company makes clear to suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance.

References:
Public:
TI notes:
Ethical Charter (2013), p.8:
«The Group maintains relations of mutual cooperation and fair treatment with its suppliers; these relations are based on reciprocal square dealing and the mutual meeting of commitments.»

Annual Report (2013), p.88:
«Our corporate approach is passed on to our suppliers by way of our technical and industrial specifications, our Quality/Environment purchasing clauses and our contractual requirements. We require our Supply Chain to have the same commitment. We control the risks represented by our suppliers employing a formal and systematic approach and we require them to undergo an accreditation process before placing orders. We permanently carry out actions to assess and audit our suppliers, taking into account compliance with Quality and Environment requirements. We ask them to improve by means of "progress plans" that we monitor through to successful completion. For non-aerostructure purchases, more than 1,200 suppliers have been evaluated. Of these, around 100 account for approximately 80% of our purchases, and they are subject to specific monitoring. For aerostructure purchases, 200 suppliers have been certified, and 50 of them are subject to
We also carry out training initiatives with our buyers, and with our suppliers for the establishment of best practices. Lastly, we make sure that these initiatives do not constitute an inordinate burden for our suppliers by pooling our requests with the other contracting clients in the aeronautical sector. To this end, we participate actively in the QUALIFAS and SPACE (Supply Chain Progress towards Aerospace Community Excellence) initiatives run by the profession. Our commitment to the quality of the relationship with our suppliers has been rewarded. A survey conducted in 2013 on the practices of principals vis-à-vis SMEs ranks DASSAULT AVIATION in 3rd place nationally, and 1st in the aeronautical sector.»

A13(a):
Does the company explicitly address the corruption risks associated with offset contracting?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company explicitly addresses the corruption risks associated with offset contracting.

References:
Public:
TI notes:
The Economic Times website: Dassault Rafale downs Eurofighter Typhoon to bag $11-billion order to supply fighter jets to the Indian Air Force
’The contract for the medium multi-role combat jets comes with a 50% offset clause, which means half the value of the contract must be spent in India.’

Countertrade & Offset website: Franco-Spanish industrial co-operation for UAVs
‘Indra Sistemas, a leading Spanish Information Technology and Defence Systems company, has signed an industrial cooperation agreement covering Unmanned Aerial Vehicle Medium-Altitude Long-Endurance (MALE UAV) activities with Dassault Aviation and Thales’.
http://www.cto-offset.com/headline/franco-spanish-industrial-co-operation-for-uavs
A13(b):

Does the company conduct due diligence that minimises corruption risk when selecting its offset partners and offset brokers?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company conducts due diligence that minimises corruption risk when selecting its offset partners and offset brokers.

References:

Public:

TI notes:

The Economic Times website: Dassault Rafale downs Eurofighter Typhoon to bag $11-billion order to supply fighter jets to the Indian Air Force

‘The contract for the medium multi-role combat jets comes with a 50% offset clause, which means half the value of the contract must be spent in India.’


Countertrade & Offset website: Franco-Spanish industrial co-operation for UAVs

‘Indra Sistemas, a leading Spanish Information Technology and Defence Systems company, has signed an industrial cooperation agreement covering Unmanned Aerial Vehicle Medium-Altitude Long-Endurance (MALE UAV) activities with Dassault Aviation and Thales’.

http://www.cto-offset.com/headline/franco-spanish-industrial-co-operation-for-uavs
A15:
Does the company have an anti-corruption policy that prohibits corruption in its various forms?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has an anti-corruption policy that prohibits corruption in its various forms. TI notes that the company complies with the OECD Anti-Bribery Convention and the FCPA. However, these instruments are insufficient to score on this question.

References:
Public:
TI notes:
Ethical Charter (2013), p.5:
«Respecting the customer also means that the Dassault Aviation Group acts in conformity with the national and international laws which are in force. We will comply scrupulously with the commercial ethics and principles of the OECD convention of December 17th, 1997, which has been ratified by France and the U.S. Foreign Corrupt Practices Act of 1977, both of which, in particular, prohibit offering or granting any undue benefits, directly or indirectly, to any government employee, in exchange for acting, or refraining to act, in the performance of his duties or mandate, so as to favor the Dassault Aviation Group.

(p. 9) : In the business world, it takes care to act in conformity with laws, regulations, and established practices, in a spirit of integrity, ethics, and professionalism.»
A16:
Is the anti-corruption policy explicitly one of zero tolerance?

Score:

0

Comments:
Based on public information, there is no readily available evidence of a zero-tolerance anti-corruption policy.

References:
Public:
NA
A17:
Is the company's anti-corruption policy easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company?

Score:

2

Comments:
Based on public information, there is evidence that the company’s Ethical Charter is easily accessible to Board members, employees and third parties. The document is available on the company’s website in French and English.

References:
Public:
Ethical Charter (2013)
A17(a):
Is the company’s anti-corruption policy easily understandable and clear to Board members, employees and third parties?

Score:

2

Comments:
Based on public information, there is evidence that the company’s Ethical Charter is easily understandable and clear to Board members, employees and third parties. It is written in clear language without dense, legal terms.

References:
Public:
Ethical Charter (2013), p.5:
‘The commercial relations of our employees and agents with customers must be grounded on the principles of integrity, professionalism, and the interest of the Group. Any actions directed at a customer – invitations, entertainment, travel, and gifts – must remain appropriate in nature and within accepted limits, in both amount and frequency.
Respecting the customer also means that the Dassault Aviation Group acts in conformity with the national and international laws which are in force. We will comply scrupulously with the commercial ethics and principles of the OECD convention of December 17th, 1997, which has been ratified by France and the U.S. Foreign Corrupt Practices Act of 1977, both of which, in particular, prohibit offering or granting any undue benefits, directly or indirectly, to any government employee, in exchange for acting, or refraining to act, in the performance of his duties or mandate, so as to favor the Dassault Aviation Group.’
A18:

Does the anti-corruption policy explicitly apply to all employees and members of the Board?

Score:

1

Comments:

Based on public information, there is evidence that the company’s Ethical Charter applies to employees of the company. However, it is not clear if this includes Board members. The company therefore scores 1.

References:

Public:
Ethical Charter, p.1:
‘This Charter represents a collective commitment which will come into its own as long as everyone is on board.’

p.4:
‘Our Code of Conduct translates the 5 professional and ethical values expressed by the Dassault Aviation Group into pragmatic and operational terms. Its purpose is to unite the Group’s personnel around these principles. The code of conduct is both a collective commitment and an individual imperative. It does not substitute for the national and international legislation in force. It is not a contractual document, but an ethical commitment which must be known and applied by all. It focuses on 5 key values.’

A20:
Does the company have a policy on potential conflicts of interest, and does it apply to both employees and board members?

Score:

1

Comments:
Based on public information, there is evidence that the company has a policy on potential conflicts of interest. However, the policy does not explicitly define circumstances under which conflicts of interest may arise. Further, the company does not seem to provide guidance and case-studies to help employees understand the regulations.

References:
Public:
Ethical Charter (2013), p.8:
«The Group’s employees owe it loyalty. This includes not requesting or accepting gifts or benefits which exceed standard business practice or which might influence the employee’s behavior. Offers of travel, junkets, and participation in non-professional events must be declined. As a general rule, a conflict between one’s own personal or financial interest, whether direct or indirect, and the group’s interests must be avoided.»
A21:

Does the company have a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery?

Score:

1

Comments:

Based on public information, there is some evidence that the company has a policy for the giving and receipt of gifts, to ensure that such transactions are bona fide and not a subterfuge for bribery. However, the limits allowed are not explicitly defined and it remains unclear whether senior authorisation is required. The company therefore scores 1.

References:

Public:
Ethical Charter (2013), p.5:
«The commercial relations of our employees and agents with customers must be grounded on the principles of integrity, professionalism, and the interest of the Group. Any actions directed at a customer – invitations, entertainment, travel, and gifts – must remain appropriate in nature and within accepted limits, in both amount and frequency.
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(p.8): «The Group’s employees owe it loyalty. This includes not requesting or accepting gifts or benefits which exceed standard business practice or which might influence the employee’s behavior. Offers of travel, junkets, and participation in non-professional events must be declined. As a general rule, a conflict between one’s own personal or financial interest, whether direct or indirect, and the group’s interests must be avoided.»

A22:
Does the company's anti-corruption policy include a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery?

Score:
1

Comments:
Based on public information, there is some evidence of a statement on the giving and receipt of hospitality, that ensures that such transactions are bona fide and not a subterfuge for bribery. However, the limits are not explicitly defined and it remains unclear whether senior authorisation is required. The company therefore scores 1.

References:
Public:
Ethical Charter (2013), p.5:
«The commercial relations of our employees and agents with customers must be grounded on the principles of integrity, professionalism, and the interest of the Group. Any actions directed at a customer – invitations, entertainment, travel, and gifts – must remain appropriate in nature and within accepted limits, in both amount and frequency.
Respecting the customer also means that the Dassault Aviation Group acts in conformity with the national and international laws which are in force. We will comply scrupulously with the commercial ethics and principles of the OECD convention of December 17th, 1997, which has been ratified by France and the U.S. Foreign Corrupt Practices Act of 1977, both of which, in particular, prohibit offering or granting any undue benefits, directly or indirectly, to any government employee, in exchange for acting, or refraining to act, in the performance of his duties or mandate, so as to favor the Dassault Aviation Group.»

(p.8): «The Group’s employees owe it loyalty. This includes not requesting or accepting gifts or benefits which exceed standard business practice or which might influence the employee’s behavior. Offers of travel, junkets, and participation in non-professional events must be declined. As a general rule, a conflict between one’s own personal or financial interest, whether direct or indirect, and the group’s interests must be avoided.»
http://www.dassault-aviation.com/wp-content/blogs.dir/1/files/2013/10/ethical-
A23:
Does the company have a policy that explicitly prohibits facilitation payments?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a policy that explicitly prohibits facilitation payments.

References:
Public:
NA
A24:
Does the company prohibit political contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent? Does the company record and publicly disclose all political contributions?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company prohibits or regulates political contributions, in order to prevent undue influence or other corrupt intent.

References:
Public:
TI notes:
Ethical Charter (2013), p.9:
«As a corporate citizen, it maintains the strictest political, religious, and philosophical neutrality; it does not finance political parties, elected officials, or candidates unless such activities fully comply with existing laws.»
A25:
Does the company have a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, and discloses the issues on which the company lobbies?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, or discloses the issues on which the company lobbies.

References:
Public:
NA
A25(a):
Does the company prohibit charitable contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company prohibits charitable contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent. TI notes that the company is involved in different charitable actions.

References:
Public:
TI notes:
Annual Report (2013), p.89:
«The DASSAULT AVIATION Group is actively involved in many charities.”
A26:
Does the company provide written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company provides written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda.

References:
Public:
NA
A27:
Does the company have a training programme that explicitly covers anti-corruption?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a training programme that explicitly covers anti-corruption.

References:
Public:
TI notes:
Annual Report (2013), p.25:
«Training our employees in order to maintain our technological lead
To maintain and develop our employees’ skills, the Group’s companies have put in place support measures, in particular vocational training, mobility and work placements. In 2013, we focused training efforts on our main business lines of design, production, quality, and the operational support of our products. We also pursued our digitalbusiness initiatives in order to strengthen our competitiveness and our lead over the competition.»

(p.77): «Staff Policy...
the professional and career development of each employee, based in particular on: Jobs and Skills Forecast Management, making tools available to all employees of the Parent Company for managing their career paths, o training, in particular via the DASSAULT Institute for the development of our managers and the Skills Conservatory for the preservation of our skills and know-how,...»

A28:
Is anti-corruption training provided in all countries where the company operates or has company sites?

Score:

0

Comments:
Based on public information, there is no readily available evidence that anti-corruption training is provided in all countries where the company operates or has company sites.

References:

Public:
NA
A29:
Does the company provide targeted anti-corruption training to members of the Board?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company provides targeted anti-corruption training to members of the Board.

References:
Public:
NA
A30: Does the company provide tailored ethics and anti-corruption training for employees in sensitive positions?

Score: 0

Comments: Based on public information, there is no readily available evidence that the company provides tailored ethics and anti-corruption training for employees in sensitive positions.

References:

Public:
NA
A31:

Does the company have a clear and formal process by which employees declare conflicts of interest?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has a clear and formal process by which employees declare conflicts of interest.

References:

Public:
NA
A32:
Is the company explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company is explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities.

References:
Public:
NA
A33:
Does the company have multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity.

References:
Public:
NA
A33(a):
Are the whistleblowing channels available to all employees in all geographies?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company’s whistleblowing channels are available to all employees in all geographies.

References:
Public:
NA
A33(b):
Does the company have formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively.

References:
Public:
NA
A34:
Does the company have well-publicised resources available to all employees where help and advice can be sought on corruption-related issues?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has well-publicised resources available to all employees where help and advice can be sought on corruption-related issues.

References:
Public:
NA
A35:
Is there a commitment to non-retaliation for bona fide reporting of corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence that there is a commitment to non-retaliation for bona fide reporting of corruption.

References:
Public:
NA
Sources of Information:

Company website:
www.dassault-aviation.com/fr/
www.dassault-aviation.com/en/

Company’s Ethics:

Company’s History:
http://www.dassault-aviation.com/fr/passion/histoire/

Company’s Vision:

Company’s Strategy:

Our DNA:

Annual report (2013):

Ethical Charter (2013):