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>45%</td>
</tr>
<tr>
<td>Risk Management</td>
<td>7</td>
<td>14.3%</td>
</tr>
<tr>
<td>Company Policy and Codes</td>
<td>12</td>
<td>58.3%</td>
</tr>
<tr>
<td>Training</td>
<td>5</td>
<td>30%</td>
</tr>
<tr>
<td>Personnel and Helplines</td>
<td>7</td>
<td>42.9%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>41</strong></td>
<td><strong>41.5%</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 supporting the ethics and compliance agenda of the company. However, this statement does not explicitly reference corruption. The company therefore scores 1. To score higher the company would need to provide evidence of at least two other such statements from the last two years, or one statement from the last two years that specifically supports the company’s strong stance against corruption.

References:
Public:
Company Website (updated 2014):
‘Ethics and Compliance
"Our reputation is based on integrity and the respect of the laws and regulations – both in our domestic countries and in export countries where we operate."
"Many of our activities are not governed by laws or regulations, in which case the principle of integrity must govern our conduct. It is our personal responsibility to apply this principle at all times."
Antoine Bouvier, CEO of MBDA’
http://www.mbdasystems.com/about-mbda/ethics-and-compliance/

CEO preface to Code of Ethics (November 2011), p.2:
‘At the heart of MBDA’s strategy to become a global player in the missile and missile systems market, is the commitment to develop our business, in an ever increasing breadth of relationships outside of our domestic countries. This growth entails new challenges and responsibilities, which requires MBDA to operate at the highest standards in how we conduct our business worldwide. A collective behaviour of honesty, integrity and fairness starts with the individual conduct of each of us.
The Code of Ethics sets out the ethical principles I expect all of us to follow, regardless of location or role. These principles are not new, but are a more comprehensive version of the statements previously set out in the MBDA Operational Framework. The Code of Ethics is implemented through policies and procedures, both at Group and National level."
The Code should help us all determine how to act if we are ever in doubt. It cannot describe every situation and what action to take. However, we are all responsible for our actions. Consequently, I do invite you to read this document carefully and use it as a guide in your daily work.

If you do come across anything which you are not sure about because it seems wrong or you need advice, do not hesitate to speak up without fear of reprisal. Our reputation and future business success depend on each of us conducting our business and actions in a responsible way. The Code of Ethics is a tool to meet this goal and sets forth the behaviours expected of each of us. I rely on you to use it.

Antoine Bouvier


CSR Report (2013), p.3:

CEO statement

‘Operating at the highest ethical standards is also important in sustaining our reputation and long term business success. In the same way, we are committed to maintaining our global player role in the missile and missile systems market and we are committed to being recognised as a leader in responsible business conduct.

To support this commitment and in addition to continually update our internal business ethics policy, we are supporting the international promotion of business ethics principles within the industry through active participation to professional working groups.

In the coming year, we will be launching Compliance and Corporate Responsibility initiatives to further improve our position as well as aligning ourselves to the evolving standards and regulations.

...By working in this manner, we will be able to maintain our standards to being socially responsible ethically alert and environmentally conscious as an integral part of our business model.’

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 Chief Executive Officer or Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company. TI notes the Chief Executive Officer’s position on the Board of ASD, but has found no evidence that this role involves work on ethics and anti-corruption issues.

References:
Public:
TI notes:
ASD Governance, Board Members (2014):
‘Antoine Bouvier, CEO of MBDA’
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 Chief Executive Officer demonstrates a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company.

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, the company publishes a statement of values representing high standards of business conduct, including honesty and integrity, and demonstrates that these are translated into company policies and codes. However, the range values falls short of those sought by the question. The company therefore scores 1.

References:
Public:
Company Website (updated 2014):
‘Ethics and Compliance
Our reputation is based on integrity and the respect of the laws and regulations – both in our domestic countries and in export countries where we operate.
Many of our activities are not governed by laws or regulations, in which case the principle of integrity must govern our conduct. It is our personal responsibility to apply this principle at all times.
Antoine Bouvier, CEO of MBDA’
http://www.mbdasystems.com/about-mbda/ethics-and-compliance/

CEO preface to Code of Ethics (November 2011), p.2:
‘At the heart of MBDA’s strategy to become a global player in the missile and missile systems market, is the commitment to develop our business, in an ever increasing breadth of relationships outside of our domestic countries. This growth entails new challenges and responsibilities, which requires MBDA to operate at the highest standards in how we conduct our business worldwide. A collective behaviour of honesty, integrity and fairness starts with the individual conduct of each of us.
The Code of Ethics sets out the ethical principles I expect all of us to follow, regardless of location or role. These principles are not new, but are a more comprehensive version of the statements previously set out in the MBDA Operational Framework. The Code of Ethics is implemented through policies and procedures, both at Group and National level.
The Code should help us all determine how to act if we are ever in doubt. It cannot describe
every situation and what action to take. However, we are all responsible for our actions. Consequently, I do invite you to read this document carefully and use it as a guide in your daily work.

If you do come across anything which you are not sure about because it seems wrong or you need advice, do not hesitate to speak up without fear of reprisal. Our reputation and future business success depend on each of us conducting our business and actions in a responsible way. The Code of Ethics is a tool to meet this goal and sets forth the behaviours expected of each of us. I rely on you to use it.’

Antoine Bouvier


CSR Report (2013), p.3:

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‘Operating at the highest ethical standards is also important in sustaining our reputation and long term business success. In the same way, we are committed to maintaining our global player role in the missile and missile systems market and we are committed to being recognised as a leader in responsible business conduct.

To support this commitment and in addition to continually update our internal business ethics policy, we are supporting the international promotion of business ethics principles within the industry through active participation to professional working groups. In the coming year, we will be launching Compliance and Corporate Responsibility initiatives to further improve our position as well as aligning ourselves to the evolving standards and regulations.’

Manage Communications (BMS0611)

(p. 19): ‘BUSINESS ETHICS AND COMPLIANCE

MBDA is convinced that operating at the highest ethical standards is key to its reputation and long term business success.

Our Business Ethics approach started years ago with dedicated policies and procedures: the publication of our Code of Ethics was the opportunity to publicly share our commitment to integrity.

This past year was mainly devoted to strengthening the scope, role and responsibilities of this Compliance organisation and of its governance body, the Business Ethics Committee, with a specific focus on prevention of corruption. We also emphasized our participation in international, European and national professional working groups such as the IFBEC and the ASD Business Ethics Committee.

The Compliance organisation, led by the Group Compliance Officer, is one of the pillars of this commitment, especially by defining MBDA compliance objectives and promoting a compliance culture within the whole MBDA Group. To ensure independence, the Group Compliance Officer directly reports to the CEO; the Group Compliance Officer is accountable to the Business Ethics Committee, the Executive Committee and the Audit Committee.

Our Business Ethics rules, specifically those that relate to our Business Advisers and our most exposed employees, are continually reinforced through focused face to face
interactive sessions. These rules, policies and procedures are continually reviewed and updated when necessary to improve their suitability, adequacy and effectiveness.'
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 member of IFBEC and has signed up to the ASD Common Industry Standards.

References:
Public:
MBDA website:
‘Ethics & Compliance section

MBDA participates in IFBEC Third Annual International Conference

IFBEC (International Forum on Business Ethical Conduct) - of which MBDA is a member - held its third annual conference on 13th and 14th September 2012 in Madrid, Spain, with aerospace and defence industry representatives from around the world.

The purpose of the conference was to promote global cooperation to thereby increase integrity in public procurements and bolster the public's trust.

The conference was opened by Pedro Argüelles Salaverria, the Spanish Deputy Ministry of Defence, and included as speakers CEOs and top executives from major American and European aerospace and defence companies, as well as representatives from governmental agencies and international organizations.

More information on http://ifbec.info/

http://www.mbdasystems.com/about-mbda/ethics-and-compliance/

Extract from MBDA website: Ethics & Compliance section – Initiatives and Memberships

‘MBDA has been supporting initiatives to enhance the standards of compliance within the aerospace and defence industry for several years and continues to do so.

ASD-CISWithin the Aerospace and Defence Industries Association of Europe (ASD), MBDA
contributed to the Common Industry Standards (CIS) and signed the Statement of Adherence to the CIS. The CIS are the result of an initiative of a number of major players in the European aerospace and defence industry, to initiate and pursue the sharing between themselves and the benchmarking of their corporate integrity practices, with a view to determining, through an industry-wide cooperative effort, commonly established standards.

IFBEC

In addition, MBDA is a member of the International Forum on Business Ethical Conduct for the Aerospace and Defence Industry (IFBEC) which brings together major member companies of the Aerospace Industries Association of America (AIA) and Aerospace and Defence Industries Association of Europe (ASD) with a view to promoting and fostering through the Global Principles the development of global, industry-wide ethical standards for the companies that are active in the aerospace and defence business sector.

Global Principles

IFBEC members have jointly developed the Global Principles of Business Ethics for the Aerospace and Defence Industry ("Global Principles"). These Global Principles are based on best practices including the Common Industry Standards for European Aerospace and Defence and the Defence Industry Initiative on Ethics and Business Conduct in the US.’

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

Score:

2

Comments:
Based on public information, there is evidence that the company has appointed the Business Ethics Committee with overall corporate responsibility for its ethics and anti-corruption agenda. The company website provides detail about the remit and activities of the Committee responsible.

References:
MBDA has put in place an independent compliance organization comprising:

- A Group Compliance Officer reporting directly to the Chief Executive Officer, in charge of MBDA’s Integrity Programme; and a compliance officer network within the MBDA Group
- The Business Ethics Committee, which is a dedicated corporate committee responsible for overseeing the implementation of MBDA’s Business Ethics Policy and Procedure, issuing the appropriate recommendations and disseminating MBDA’s high business ethics standards on a continuing basis throughout the whole MBDA Group.

The MBDA Integrity Programme

The MBDA Integrity Programme is organized in 3 phases: prevent; monitor; and respond. It is constantly updated, developed and improved to meet the international best practices in the field of ethics and compliance. The Integrity Programme progress status is reviewed by the Business Ethics Committee.

Policies and procedures supporting the implementation of the Code of Ethics are regularly analysed and strengthened where appropriate to ensure employees have clear guidance on how to conduct business and act in a responsible way.

Awareness sessions and training on business ethics matters are continuously reinforced and monitored through a dedicated training programme.’


MBDA is convinced that operating at the highest ethical standards is key to its reputation and long term business success.

...The Compliance organisation, led by the Group Compliance Officer, is one of the pillars of this commitment, especially by defining MBDA compliance objectives and promoting a compliance culture within the whole MBDA Group. To ensure independence, the Group Compliance Officer directly reports to the CEO; the Group Compliance Officer is accountable to the Business Ethics Committee, the Executive Committee and the Audit Committee.’


Company’s Ownership Structure:
http://www.mbda-systems.com/about-mbda/mbda-at-a-glance/ownership-structure/
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:

1

Comments:
Based on public information, there is evidence that the Group Compliance Officer is responsible for the company’s ethics and anti-corruption agenda. The Group Compliance Officer reports directly to the CEO, but is not identifiable by name. The company therefore scores 1.

References:
MBDA has put in place an independent compliance organization comprising:

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This past year was mainly devoted to strengthening the scope, role and responsibilities of this Compliance organisation and of its governance body, the Business Ethics Committee, with a specific focus on prevention of corruption. We also emphasized our participation in international, European and national professional working groups such as the IFBEC and the ASD Business Ethics Committee.

...The Compliance organisation, led by the Group Compliance Officer, is one of the pillars of this commitment, especially by defining MBDA compliance objectives and promoting a compliance culture within the whole MBDA Group. To ensure independence, the Group Compliance Officer directly reports to the CEO; the Group Compliance Officer is accountable to the Business Ethics Committee, the Executive Committee and the Audit Committee.

Our Business Ethics rules, specifically those that relate to our Business Advisers and our most exposed employees, are continually reinforced through focused face to face interactive sessions. These rules, policies and procedures are continually reviewed and updated when necessary to improve their suitability, adequacy and effectiveness.’

A8:
Is there regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda?

Score:

1

Comments:
Based on public information, there is some evidence that there is regular Board level monitoring and review of the company’s Integrity Programme. However, it is unclear how often this review process occurs. The company therefore scores 1.

References:
MBDA website (updated 2014):

‘Business Ethics

Governance

MBDA has put in place an independent compliance organization comprising:

- A Group Compliance Officer reporting directly to the Chief Executive Officer, in charge of MBDA’s Integrity Programme; and a compliance officer network within the MBDA Group
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Awareness sessions and training on business ethics matters are continuously reinforced and
monitored through a dedicated training programme.’


Extract from Company’s CSR Report (2013), p.19:

‘BUSINESS ETHICS AND COMPLIANCE
MBDA is convinced that operating at the highest ethical standards is key to its reputation and long term business success.

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Our Business Ethics rules, specifically those that relate to our Business Advisers and our most exposed employees, are continually reinforced through focused face to face interactive sessions. These rules, policies and procedures are continually reviewed and updated when necessary to improve their suitability, adequacy and effectiveness.’

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:

1

Comments:
Based on public information, there is limited evidence of a formal, written plan on which the review of the ethics and anti-corruption agenda by senior management is based. The Business Ethics Committee reviews the Integrity Programme based upon risk assessments and integrity programme reviews, the company’s policies and procedures, and communication and training. Evidence suggests that improvement plans are implemented when issues are identified, but no further details are provided. The company therefore scores 1.

References:
MBDA has put in place an independent compliance organization comprising:

- A Group Compliance Officer reporting directly to the Chief Executive Officer, in charge of MBDA’s Integrity Programme; and a compliance officer network within the MBDA Group
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how to conduct business and act in a responsible way.

Awareness sessions and training on business ethics matters are continuously reinforced and monitored through a dedicated training programme.’

http://www.mbda-systems.com/about-.mbda/ethics-and-compliance/business-ethics/

Extract from MBDA’s CSR Report (2013), p. 13:
‘ASSURANCE
Assurance is provided to the business through the disciplines of Internal Audit, Group Compliance, Risk Management and Quality Audit. Assurance is focused on the governance of the business and is achieved through systematic approaches that assess the effectiveness of the design and execution of the internal controls. Recommendations are made to implement new controls and to improve the effectiveness of existing controls. In addition, an Enterprise Risk Management approach ensures that risks are identified and managed across the business. These risks are used to influence the assurance agenda.’

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. TI notes that the company has an Integrity Programme in place, but it remains unclear whether this also includes a formal process of response to actual or alleged instances of corruption.

References:
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Our Business Ethics rules, specifically those that relate to our Business Advisers and our most exposed employees, are continually reinforced through focused face to face interactive sessions. These rules, policies and procedures are continually reviewed and updated when necessary to improve their suitability, adequacy and effectiveness.’

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

Score:

1

Comments:
Based on public information, there is some evidence that the company has an anti-corruption risk assessment procedure implemented enterprise-wide. However, there is insufficient evidence of anti-corruption risk ownership and the development of mitigation plans. The company therefore scores 1.

References:
Public:

MBDA Website (updated 2014):
‘The MBDA Integrity Programme

The MBDA Integrity Programme is organized in 3 phases: prevent; monitor; and respond. It is constantly updated, developed and improved to meet the international best practices in the field of ethics and compliance. The Integrity Programme progress status is reviewed by the Business Ethics Committee.
Policies and procedures supporting the implementation of the Code of Ethics are regularly analysed and strengthened where appropriate to ensure employees have clear guidance on how to conduct business and act in a responsible way.

Awareness sessions and training on business ethics matters are continuously reinforced and monitored through a dedicated training programme.’

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 some evidence that the company has procedures to minimise corruption risk when selecting or reappointing its agents. However, it is not clear that due diligence forms part of this process and there is no evidence that the company refreshes its due diligence at least every three years and/or when there is a significant change in the business relationship. The company therefore scores 0.

References:
Public:
TI notes:
MBDA Code of Ethics (November 2011), p.4:
‘Business advisors
We must never hire someone else to do anything that we cannot ethically or legally do ourselves. Engaging a third-party to indirectly make an improper payment violates anti-corruption laws. The selection of business advisors is guided by strict internal procedures.’

CSR Report (2013), p. 19:
‘Our Business Ethics rules, specifically those that relate to our Business Advisers and our most exposed employees, are continually reinforced through focused face to face interactive sessions. These rules, policies and procedures are continually reviewed and updated when necessary to improve their suitability, adequacy and effectiveness.’
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:
TI notes:
Extract from Code of Ethics (2011), p.4:
‘Business advisors
We must never hire someone else to do anything that we cannot ethically or legally do ourselves. Engaging a third-party to indirectly make an improper payment violates anti-corruption laws. The selection of business advisors is guided by strict internal procedures.’

CSR Report (2013), p.19:
‘Our Business Ethics rules, specifically those that relate to our Business Advisers and our most exposed employees, are continually reinforced through focused face to face interactive sessions. These rules, policies and procedures are continually reviewed and updated when necessary to improve their suitability, adequacy and effectiveness.’
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:
1

Comments:
Based on public information, there is some evidence that the company makes clear to suppliers its stance on business ethics and its pillars of corporate social responsibility. However, there is no readily available information on the consequences to suppliers of breaches to these policies. Further, there seems to be no information on contractual terms that may apply in this regard. The company therefore scores 1.

References:
Public:
Code of Ethics (November 2011), p.4:
‘Suppliers
Suppliers deliver an important part of the value of our products and play an important role in customer satisfaction. We must promote ethical relationships with our suppliers and make sure that they are treated fairly and equally.
In the selection of goods and services account must be taken of price, quality, performance, delivery and suitability.’

CSR Report (2013), p.15:
‘The performance of our key suppliers is a critically important part of our own performance. This means that selecting and developing a supply chain is vital to maintaining the world-class performance that our customers have come to know and expect. So, prior to selecting suppliers, MBDA can undertake a robust evaluation in order to identify perceived risks. The evaluation includes our supplier’s ability to manage their own supply chain. Once we have selected our key suppliers, we monitor and help develop them on an on-going basis so that we can anticipate and understand any perceived risks and poor performance and also ensure that identified risks are being mitigated. We have a range of methods and tools to continuously develop our supply chain.
We work with suppliers to develop a product, which means we effectively share interest in that product’s success. We recognise the increased levels of legislation (such as REACH)
across all of our NatCos and therefore, it is imperative that we cascade our Corporate and Social Responsibility principles into the extended supply chain by communicating and training, ensuring that the supply chain is capable of managing within such legislation.’


Company’s website, Supplier Corporate Social Responsibility (updated 2014):
‘MBDA and its procurement function is committed to supporting the three pillars of sustainability; Environmental, Economic and Social with ethical actions, operations, products and services. We are committed to being a responsible customer and partner, collaborating closely with the entire supply chain to integrate these three pillars into our collective business operations.

Economic
- MBDA requires suppliers to deliver Value For Money which minimises the social, environmental and cost impacts through the life of products and services.
- Maintain robust governance to minimise risk exposures throughout our supply chain.
- Strict compliance with regulatory requirements.

Social
- MBDA collaborates closely with its entire supply chain as a responsible customer and partner to improve sustainability performance.
- We are a responsible and proactive neighbour engaging positively in the communities in which we, and our suppliers, operate.’


Company’s website, Supplier: Ethics and Compliance (updated 2014):
‘Successful business outcomes and responsible behaviour in society are important for us and should be for our suppliers. At MBDA we adhere to, and expect our suppliers to observe, the values of fairness, transparency, accountability and sustainability. We actively promote ethical relationships with our suppliers and make sure that they are treated fairly and equally in the selection of goods and services ensuring account is taken of price, quality, performance, delivery and sustainability.’


Company’s website, Procurement Practices (updated 2014):
‘Building Two-Way Long Term Supplier Relationships
We believe that good business relationships are built on trust. That’s why we have a dedicated team committed to promoting open and honest communication, innovation and continuous support with all our suppliers, so that an atmosphere of mutual challenge and capability development is the norm. It allows us to build long term relationships with successful suppliers that are committed to providing us with a product or service which adds significant value to our organization.
Diverse Sourcing

MBDA procures from a global supply base in order to ensure we contract only the best suppliers. However, occasionally the sensitivity of the defence industry places constraints upon our ability to procure from suppliers beyond our national borders. In this case we will still adhere to our principles and procure from the best domestic supplier.’

http://www.mbdasystems.com/supplier/procurement-practices/

Company’s website, Supplier, Working with MBDA (updated 2014):
‘At MBDA we believe we are only as strong as the weakest link in our supply chain. That’s why we look not only for suppliers that deliver on cost, quality and time but also those who reflect our commitment to operational excellence, innovation and sustainability.

As a global leader in a complex industry we want to forge successful relationships with our suppliers that are built on mutual development, flexibility, integrity and competition. At MBDA we don’t see suppliers as working for us, but with us, in a joint effort to develop tomorrow’s solutions today. For further detailed information about our systems please click here.

To optimally manage our Supply Chain, the MBDA procurement organisation is divided into the following three areas of expertise:

Industrial Policy & Supply Chain Management (IPSCM)

IPSCM concentrates on developing a sustainable, high performing and technologically aligned supply base capable of supporting MBDA’s position as the European Industrial Leader in the Complex Weapons global supply chain. We do this through defining industrial policies, such as ‘Make or Buy’, and by continuously striving to improve our supply chain through the development of lasting supplier relationships, the identification, evaluation and mitigation of risk, and the fostering of innovation throughout the supply chain.’

http://www.mbdasystems.com/supplier/working-with-mbda/
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:
NA
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:
NA

NA
A15:
Does the company have an anti-corruption policy that prohibits corruption in its various forms?

Score:
2

Comments:
Based on public information, there is evidence that the company has an anti-corruption policy that prohibits corruption in its various forms.

References:
Public:
MBDA Code of Ethics (November 2011), p. 4:
‘Fair competitionWe must always behave ethically when competing for customers’ business and when placing business with suppliers. Honesty and integrity clearly apply to our dealings with both customers and suppliers. This is especially true in the development phase of new business and in the negotiation phase of contracts.
We must always comply with competition, antitrust and anti-corruption laws.
We strictly adhere to the principles of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions as well as the United Nations Convention Against Corruption. It is our collective and individual responsibility to never engage MBDA in any form of corruption, whether public or private.
As a member of the AeroSpace and Defence Industries Association of Europe (ASD), MBDA recognises that the “Common Industry Standards” issued by the ASD reflect good industry practice and adhere to their term.

Business advisors
We must never hire someone else to do anything that we cannot ethically or legally do ourselves. Engaging a third-party to indirectly make an improper payment violates anti-corruption laws. The selection of business advisors is guided by strict internal procedures.

Suppliers
Suppliers deliver an important part of the value of our products and play an important role in customer satisfaction. We must promote ethical relationships with our suppliers and make sure that they are treated fairly and equally.
In the selection of goods and services account must be taken of price, quality, performance, delivery and suitability.’
Gifts and hospitality extract from MBDA Code of Ethics on website:

‘MBDA aims to ensure that any business decision made by us, our customers, suppliers or other business partners is solely based on relevant criteria, such as competitiveness, performance and quality of products and services offered. Business courtesies, such as gifts and hospitality, given to or received from customers, suppliers or other business partners must reflect a normal courtesy of business and may not influence, or give the appearance of influencing, any business decision.

Gifts and hospitality must not be given or received with a corrupt purpose anywhere in the world. Reasonable behaviour, common sense and prudence should always guide us in these situations and it is our duty to always comply with our internal procedures as well as with the laws and regulations of our domestic countries and those of other countries where we do business. Gifts in cash or any lavish hospitality are never permitted.’

(p.12): ‘Key reference documents
MBDA Business Ethics Policy and Procedure (MP M3.0356)
Policy and Procedures Concerning Gifts and Hospitality (MP M3.0001)’

A16:
Is the anti-corruption policy explicitly one of zero tolerance?

Score:

0

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

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 anti-corruption policy is easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company.

References:

Public:
Code of Ethics available in principal languages of company’s subsidiaries and operations on website:

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 anti-corruption policy is easily understandable and clear to Board members, employees and third parties. References to anti-corruption can be found in the Code of Ethics, the website and the Corporate Social Responsibility report, and the language is easy to read.

References:

Public:
MBDA Code of Ethics (November 2011):

CSR Report (2013):

Company’s website, Ethics and Compliance:

Company’s website, Business Ethics:
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 anti-corruption policy applies to all employees, though it is not clear if this includes members of the Board. TI notes that there are additional responsibilities ascribed to the managers, but the scope of the policies does not explicitly cover senior management and Board members. The company therefore scores 1.

References:

Public:
MBDA Code of Ethics (2011), p.11:
‘Employees
The Code of Ethics applies to everyone within the company. All employees are expected to assume responsibility for performing their duties with fairness and integrity, to have an understanding of the Code of Ethics and to refer to it regularly, to have a detailed knowledge of those of its provisions that apply specifically to their job and to consult their manager if in doubt.

Manager responsibility
MBDA managers have additional responsibilities that go beyond complying with the Code. They are expected to lead by example and to demonstrate adherence to the Code at all times. Managers are expected to promote MBDA ethical standards and effectively communicate or make available the Code’s principles, as well as relevant policies and procedures that apply to their job areas, to all those who report to them. They should also be prepared to answer questions about the Code and create a comfortable working climate in which employees feel encouraged to bring forth questions or concerns.’

CSR Report (2013), p.5: ‘Executive Committee
The Executive Committee has delegation from the MBDA Board to manage MBDA and is chaired by the Chief Executive Officer of MBDA. All Executive Committee
members report to the CEO and rank equally. The Executive Committee is the MBDA major management decisions body. Its main mission is to ensure an efficient coordination within all its members, especially for the most complex and sensitive topics to be addressed by the company. The Executive Committee members are appointed by the CEO with prior approval from the MBDA Board.

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, the company has a policy on potential conflicts of interest. However, the company does not provide a definition or examples of potential conflicts of interest, nor is there evidence of its application to Board members. The company therefore scores 1.

References:
Public:
MBDA Code of Ethics (November 2011), p. 5:
‘Conflicts of Interest
All of us as employees are required to avoid conflicts of interest between our obligations to MBDA and our personal affairs. Any relationship or activity which could or would influence, or appear to influence, performance of our duties to MBDA must be disclosed to our manager.’
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, the company has a policy for the giving and receipt of gifts; however, little guidance is given with respect to reasonable limits or the need for senior authorisation. The company therefore scores 1.

References:
Public:
MBDA Code of Ethics (November 2011), p. 5:
‘Gifts and hospitality
MBDA aims to ensure that any business decision made by us, our customers, suppliers or other business partners is solely based on relevant criteria, such as competitiveness, performance and quality of products and services offered. Business courtesies, such as gifts and hospitality, given to or received from customers, suppliers or other business partners must reflect a normal courtesy of business and may not influence, or give the appearance of influencing, any business decision. Gifts and hospitality must not be given or received with a corrupt purpose anywhere in the world. Reasonable behaviour, common sense and prudence should always guide us in these situations and it is our duty to always comply with our internal procedures as well as with the laws and regulations of our domestic countries and those of other countries where we do business. Gifts in cash or any lavish hospitality are never permitted.’
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, the company has a policy for the giving and receipt of hospitality; however, little guidance is given with respect to reasonable limits or the need for senior authorisation. The company therefore scores 1.

References:
Public:
MBDA Code of Ethics (November 2011), p. 5:
‘Gifts and hospitality
MBDA aims to ensure that any business decision made by us, our customers, suppliers or other business partners is solely based on relevant criteria, such as competitiveness, performance and quality of products and services offered. Business courtesies, such as gifts and hospitality, given to or received from customers, suppliers or other business partners must reflect a normal courtesy of business and may not influence, or give the appearance of influencing, any business decision.
Gifts and hospitality must not be given or received with a corrupt purpose anywhere in the world. Reasonable behaviour, common sense and prudence should always guide us in these situations and it is our duty to always comply with our internal procedures as well as with the laws and regulations of our domestic countries and those of other countries where we do business. Gifts in cash or any lavish hospitality are never permitted.’
A23: Does the company have a policy that explicitly prohibits facilitation payments?

Score:

1

Comments:

Based on public information, there is evidence that the company has a policy that explicitly prohibits facilitation payments. However, the company provides no guidance or supplementary information on how the policy is to be implemented in practice. The company therefore scores 1.

References:

Public:
MBDA Code of Ethics (November 2011), p. 5:
‘Facilitation payments
Facilitation payments are small unofficial payments to low-level public officials to speed up or obtain routine administrative processes. MBDA prohibits such facilitation payments in any country where we operate.’

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:

2

Comments:
Based on public information, there is evidence that the company prohibits political contributions in order to prevent undue influence or other corrupt intent.

References:
Public:
MBDA Code of Ethics (November 2011), p. 10:
‘Political contributions and activity
Political contributions are often subject to national laws and vary from country to country. MBDA’s policy is not to make contributions, financial or in kind, to political parties or organisations, or to individual politicians.
MBDA respects the rights of its employees to participate as individuals in their community and civic affairs.
This must be done at a personal level or through a Political Action Committee when permitted by law (such as in the US), in their own time and at their own expense, consistent with applicable laws.
Employees need to carefully separate their own political activities from MBDA activities and avoid any conflict of interest.’
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:

1

Comments:

Based on public information, there is evidence of a procedure to control charitable contributions. TI notes that there is a list of recipients in the CSR Report, but it is not clear how extensive this is. The company therefore scores 1.

References:

Public:
MBDA Code of Ethics (November 2011), pp.5-10:
‘(p. 5): Sponsorship
Sponsorship is part of the marketing and communication strategy. It is authorised in compliance with applicable laws and regulations. Decisions to engage the company in any sponsorship is subject to prior approval of MBDA and must be properly recorded.

(p.10): Donations
Donations to public-interest or private organisations on behalf of MBDA may be permitted in compliance with all applicable laws and regulations. Decisions to engage the company in any donations to our communities or charities is subject to prior approval of MBDA and must be properly recorded’

CSR Report (2013), p.20:
‘COMPANY GIVING
Within our business, across all the National Boundaries, where we operate, we support and contribute to events of other organisations where their activities are aligned to our principles of responsible conduct. This includes programmes and activities associated to cultural needs, educational and humanitarian/welfare programmes, the environment or other non-profit making activities. We maintain visibility of all the endorsed programmes and the associated funding requests ensuring that we constantly comply with the highest standards of ethical business. Our company giving programme allocates the funds with the approval of the appropriate Business Unit Managing Director and Sales and Business Development Director to support our business activities and the local communities where
The funds allocated to the current year (2013) for both donations and sponsorship are valued at 1.9M€.

COMMUNITY ENGAGEMENT
MBDA does not live in isolation. Each of its sites is someone else’s neighbour. The nearest neighbour may well be another industrial concern but, spreading the net a bit wider, MBDA interfaces with numerous local organisations. Often, this is a result of MBDA’s day-to-day business activities but other links may be less obvious. Communities build up infrastructures over time and the allocation of costs and benefits among all the contributors and beneficiaries take a back seat when the combined activities strive to improve the social progress of a local area for the common good. Therefore, MBDA strives to be a good neighbour that realises it needs to engage with local institutions.

In 2013, MBDA continued many ongoing schemes to encourage an interest in science, technology, engineering and mathematics in local schools. Young MBDA employees go into schools as engineering ambassadors, demonstrating that engineering and technology is not only useful but can also be fun. Examples included offering guidance before and during inter-school contests involving robots or model gliders. There have also been visits by secondary schoolgirls to different MBDA Natco sites to demonstrate that engineering is not a male-only discipline. A spin-off of this is that MBDA might just find some of its future employees. MBDA prides itself in its involvement with charitable events, realising that there will always be those who are less fortunate than others. The exact nature of this involvement does vary across MBDA, reflecting the different cultural approaches in the various NatCo countries. In MBDA France, for instance, the Rallye du Partage event in September continued the aim of changing attitudes towards disability, with this year’s focus being providing advice on cooking and culminating in the preparation of a three-course meal. MBDA Italy has entered into a new agreement with Fondazione Banco Alimentare Onlus (Onlus Food Bank Foundation) to supply surplus food from the Rome site restaurant to local charities. In the UK, there are Charity Challenge teams at the three main sites to organise a calendar of fundraising events throughout the year.

MBDA Spain employees collaborated with neighbouring companies to raise 100 tonnes of food during December for the Madrid Banco de Alimentos (Food Bank). MBDA Germany’s 2013 charitable activities included support for the Regens-Wagner Foundation, which provides various services for the handicapped. Also a team from MBDA Germany raised money for UNICEF through sponsorship for taking part in the charity’s Ingolstadt Firmenlauf (Companies Run). However, one event that brought all the countries together in November 2013 was the MBDA UK Charity Dinner, where auction prizes from the other MBDA nations helped raised a total of £140,000 for military and local 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 insufficient evidence that the company provides written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda. The information in the Code of Ethics on manager responsibility suggests that specific guidance may be in place, but this remains unclear from public information. TI does note that the company website refers to internal company policies and an intranet.

Public:

TI notes:

MBDA Code of Ethics (November 2011), p.3:

‘Seeking guidance and reporting concerns

The Code of Ethics cannot cover every situation that we may face within our everyday role. We may find ourselves faced with a dilemma that we are not sure how to resolve.

There are a number of ways that we can seek advice and support.

We can contact our immediate manager, someone else in our management structure, our Human Resources department, our Legal department or Compliance Officers.

We must not let any concerns go unresolved.

No reprisal will be tolerated against employees making such a report in good faith.

(p.11): ‘Manager responsibility

MBDA managers have additional responsibilities that go beyond complying with the Code.

They are expected to lead by example and to demonstrate adherence to the Code at all times.

Managers are expected to promote MBDA ethical standards and effectively communicate or make available the Code’s principles, as well as relevant policies and procedures that apply to their job areas, to all those who report to them.

They should also be prepared to answer questions about the Code and create a comfortable working climate in which employees feel encouraged to bring forth questions or concerns.’
The Code of Ethics refers to two internal documents:

(p.12): MBDA Business Ethics Policy and Procedure (MP M3.0356)
Policy and Procedures Concerning Gifts and Hospitality (MP M3.0001)
A27:
Does the company have a training programme that explicitly covers anti-corruption?

Score:

1

Comments:
Based on public information, there is evidence that the company has a training programme on its ethics and compliance systems, which includes an anti-corruption policy. However, there is no evidence of a specific anti-corruption training module. The company therefore scores 1.

References:
MBDA has put in place an independent compliance organization comprising:

- A Group Compliance Officer reporting directly to the Chief Executive Officer, in charge of MBDA’s Integrity Programme; and a compliance officer network within the MBDA Group
- The Business Ethics Committee, which is a dedicated corporate committee responsible for overseeing the implementation of MBDA’s Business Ethics Policy and Procedure, issuing the appropriate recommendations and disseminating MBDA’s high business ethics standards on a continuing basis throughout the whole MBDA Group.

The MBDA Integrity Programme

The MBDA Integrity Programme is organized in 3 phases: prevent; monitor; and respond. It is constantly updated, developed and improved to meet the international best practices in the field of ethics and compliance. The Integrity Programme progress status is reviewed by the Business Ethics Committee.

Policies and procedures supporting the implementation of the Code of Ethics are regularly analysed and strengthened where appropriate to ensure employees have clear guidance on how to conduct business and act in a responsible way.

Awareness sessions and training on business ethics matters are continuously reinforced and monitored through a dedicated training programme.
Specific information related to ethics and compliance are available to employees through the company intranet.


MBDA Code of Ethics (November 2011), p.11:

‘Awareness and training

The Code of Ethics is distributed to all employees and available on the MBDA intranet site. It is also published on the MBDA internet site for our stakeholders. The Code of Ethics is promoted via the MBDA Integrity Programme and training as well as e-learning modules focused on the key principles of the Code are available for employees who need it to carry out their responsibilities. In addition, employees have access to the Ethics and Compliance section on the intranet site where they can find additional guidelines.’


CSR Report (2013), p.19:

‘BUSINESS ETHICS AND COMPLIANCE

MBDA is convinced that operating at the highest ethical standards is key to its reputation and long term business success. Our Business Ethics approach started years ago with dedicated policies and procedures: the publication of our Code of Ethics was the opportunity to publicly share our commitment to integrity.

This past year was mainly devoted to strengthening the scope, role and responsibilities of this Compliance organisation and of its governance body, the Business Ethics Committee, with a specific focus on prevention of corruption. We also emphasized our participation in international, European and national professional working groups such as the IFBEC and the ASD Business Ethics Committee.

...The Compliance organisation, led by the Group Compliance Officer, is one of the pillars of this commitment, especially by defining MBDA compliance objectives and promoting a compliance culture within the whole MBDA Group. To ensure independence, the Group Compliance Officer directly reports to the CEO; the Group Compliance Officer is accountable to the Business Ethics Committee, the Executive Committee and the Audit Committee.

Our Business Ethics rules, specifically those that relate to our Business Advisers and our most exposed employees, are continually reinforced through focused face to face interactive sessions. These rules, policies and procedures are continually reviewed and updated when necessary to improve their suitability, adequacy and effectiveness.’

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

Score:

1

Comments:
Based on public information, there is evidence that anti-corruption training is offered to all employees. However, it is not clear that training is provided in all countries where the company operates or has company sites. The company therefore scores 1.

References:
Public:

Code of Ethics (November 2011), p. 11:

‘Awareness and training
The Code of Ethics is distributed to all employees and available on the MBDA intranet site. It is also published on the MBDA internet site for our stakeholders. The Code of Ethics is promoted via the MBDA Integrity Programme and training as well as e-learning modules focused on the key principles of the Code are available for employees who need it to carry out their responsibilities.

In addition, employees have access to the Ethics and Compliance section on the intranet site where they can find additional guidelines.’

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: 1

Comments: Based on public information, there is limited evidence that suggests the company provides tailored training to the most exposed employees. However, the scope and the content of these training sessions remains unclear. The company therefore scores 1.

References:

Public:

MBDA Code of Ethics (November 2011), p. 11:

‘Awareness and training
The Code of Ethics is distributed to all employees and available on the MBDA intranet site. It is also published on the MBDA internet site for our stakeholders. The Code of Ethics is promoted via the MBDA Integrity Programme and training as well as e-learning modules focused on the key principles of the Code are available for employees who need it to carry out their responsibilities.
In addition, employees have access to the Ethics and Compliance section on the intranet site where they can find additional guidelines.’


CSR Report (2013), p. 19:

‘Our Business Ethics rules, specifically those that relate to our Business Advisers and our most exposed employees, are continually reinforced through focused face to face interactive sessions. These rules, policies and procedures are continually reviewed and updated when necessary to improve their suitability, adequacy and effectiveness.’

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 limited evidence that the company has a process by which employees declare conflicts of interest, primarily through reporting it to their manager. However, it is not clear that declarations must be made formally and in writing. The company therefore scores 0.

References:
Public:
Ti notes:
MBDA Code of Ethics (November 2011), p.3:
‘Seeking guidance and reporting concerns
There are a number of ways that we can seek advice and support.
We can contact our immediate manager, someone else in our management structure, our Human Resources department, our Legal department or Compliance Officers.’

(p. 5):
‘Conflicts of interest
All of us as employees are required to avoid conflicts of interest between our obligations to MBDA and our personal affairs.
Any relationship or activity which could or would influence, or appear to influence, performance of our duties to MBDA must be disclosed to our manager.’
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 insufficient readily available evidence that the company is explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have violated the Code of Ethics and the respective policies. TI notes that the Code of Ethics refers to cases of violations of the policies and procedures, but this falls short of providing an explicit commitment to disciplinary measures.

References:

Public:
TI notes:
MBDA Code of Ethics (November 2011), p. 11
‘Consequences of violations of MBDA policies and procedures
All employees are responsible for ensuring that their conduct and that of those reporting to them fully complies with the Code of Ethics. Violation of the Code may have severe and lasting consequences on MBDA’s reputation, business relations and financial situation.’
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:

1

Comments:
Based on public information, there is evidence that the company has some channels for reporting concerns or instances of suspected corrupt activity. However, there is no evidence that these channels include independent sources or facilitate anonymous reporting. The company therefore scores 1.

References:
Public:
MBDA’s Code of Ethics (2011), p. 2:
‘Message from the Chief Executive Officer
...if you do come across anything which you are not sure about because it seems wrong or you need advice, do not hesitate to speak up without fear of repraisal.’
(p. 3):‘Seeking guidance and reporting concerns
The Code of Ethics cannot cover every situation that we may face within our everyday role. We may find ourselves faced with a dilemma that we are not sure how to resolve. There are a number of ways that we can seek advice and support. We can contact our immediate manager, someone else in our management structure, our Human Resources department, our Legal department or Compliance Officers. We must not let any concerns go unresolved. No reprisal will be tolerated against employees making such a report in good faith.’
A33(a):
Are the whistleblowing channels available to all employees in all geographies?

Score:

2

Comments:
Based on public information, there is evidence that across geographies, all employees have access to more than one whistleblowing channel.

References:
Public:
MBDA Code of Ethics (2011), p. 3:
‘Seeking guidance and reporting concerns
The Code of Ethics cannot cover every situation that we may face within our everyday role.
We may find ourselves faced with a dilemma that we are not sure how to resolve.
There are a number of ways that we can seek advice and support.
We can contact our immediate manager, someone else in our management structure, our Human Resources department, our Legal department or Compliance Officers.
We must not let any concerns go unresolved.
No reprisal will be tolerated against employees making such a report in good faith.’
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:

1

Comments:
Based on public information, there is limited evidence of efforts to ensure whistleblowing is not deterred. However, there is no evidence of mechanisms designed to ensure that whistleblowers are supported, such as detailed analysis of whistleblowing data or independent employee surveys. The company therefore scores 1.

References:
Public:
MBDA Code of Ethics (2011), p. 2:
‘Message from the Chief Executive Officer
...if you do come across anything which you are not sure about because it seems wrong or you need advice, do not hesitate to speak up without fear of reprisal.

(p. 3):‘Seeking guidance and reporting concerns
The Code of Ethics cannot cover every situation that we may face within our everyday role. We may find ourselves faced with a dilemma that we are not sure how to resolve. There are a number of ways that we can seek advice and support.
We can contact our immediate manager, someone else in our management structure, our Human Resources department, our Legal department or Compliance Officers. We must not let any concerns go unresolved.
No reprisal will be tolerated against employees making such a report in good faith.’
A34: Does the company have well-publicised resources available to all employees where help and advice can be sought on corruption-related issues?

Score: 1

Comments: Based on public information, employees have access to well-publicised resources where help and advice can be sought on corruption-related issues. For example, employees may talk to their supervisor. However, there is no evidence that he or she is trained for the advisory job. The company therefore scores 1.

References:

Public:
MBDA Code of Ethics (November 2011), p. 3:
‘Seeking guidance and reporting concerns
The Code of Ethics cannot cover every situation that we may face within our everyday role. We may find ourselves faced with a dilemma that we are not sure how to resolve. There are a number of ways that we can seek advice and support. We can contact our immediate manager, someone else in our management structure, our Human Resources department, our Legal department or Compliance Officers. We must not let any concerns go unresolved. No reprisal will be tolerated against employees making such a report in good faith.’

‘The MBDA Integrity Programme
The MBDA Integrity Programme is organized in 3 phases: prevent; monitor; and respond. It is constantly updated, developed and improved to meet the international best practices in the field of ethics and compliance. The Integrity Programme progress status is reviewed by the Business Ethics Committee.'
Policies and procedures supporting the implementation of the Code of Ethics are regularly analysed and strengthened where appropriate to ensure employees have clear guidance on how to conduct business and act in a responsible way.

Awareness sessions and training on business ethics matters are continuously reinforced and monitored through a dedicated training programme.’

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

Score:
1

Comments:
Based on public information, there is evidence that the company has a clear, legally enforceable, non-retaliation policy for bona fide reporting of corruption. However, there is no clear evidence that disciplinary measures are applied to employees who breach this policy. The company therefore scores 1.

References:
Public:
MBDA Code of Ethics (November 2011), p.3:
‘Seeking guidance and reporting concerns
The Code of Ethics cannot cover every situation that we may face within our everyday role. We may find ourselves faced with a dilemma that we are not sure how to resolve. There are a number of ways that we can seek advice and support. We can contact our immediate manager, someone else in our management structure, our Human Resources department, our Legal department or Compliance Officers. We must not let any concerns go unresolved.
No reprisal will be tolerated against employees making such a report in good faith.’
Information Sources:

Company website:  
www.mbda-systems.com

Company’s Business Ethics:  

Company’s Code of Ethics (In English, French, German and Italian):  

Code of Ethics (English):  

Company’s Locations:  

Suppliers Ethics and Compliance:  

Company’s Corporate Social Responsibility:  

CSR Report (2013):  

Company’s website, Supplier Ethics and Compliance:  
Supplier: Working with MBDA:  
http://www.mbda-systems.com/supplier/working-with-mbda/

Supplier Corporate and Social Responsibility:  

Procurement Practices:  
http://www.mbda-systems.com/supplier/procurement-practices/

MBDA’s Ownership Structure:  
http://www.mbda-systems.com/about-mbda/shareholders/