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Thales Gifts & Hospitality Platform

USER GUIDE

Update : December 2024

Security level : Internal

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I. Introduction (1/2)

This platform is developed by Optimy and is intended to facilitate Thales process for recording and approving Gifts and Hospitality in accordance with the Gifts and Hospitality Group Instruction.

The online form contains information designed to help you complete the description of the Gift or Hospitality that you intend to offer or that you have received.

The online form is automatically saved so you can leave it and work on it again before submitting.

Before submitting it to your line manager, please review it carefully and ensure that in any case, the information you submit is true and relevant.

Please keep in mind that once your request is submitted, the recording and approval process begins and that the form cannot be modified.

Any question you may have on Thales policy on Gifts and Hospitality should be directed to your local compliance officer.

I. Introduction (2/2)

This User Guide addresses the **standard process** applicable to a Thales employee :

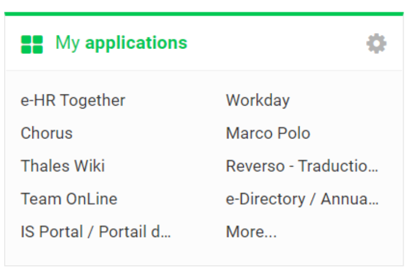
- either submitting a request for him/herself (**Declaring Person**) or
- submitting a request on behalf of someone else (**Request Submitter**).

Please note that **specific approval processes apply when the Declaring Person is a Large Country Director or a Member of a Group ExCom Committee.** Specific information are made available to EXCOM Members, Large Country Directors, their assistants and persons involved in this specific approval processes.

Important information : if a request is submitted with an amount equal or below the threshold, there is no need for approval, and you will receive a confirmation of declaration.

II. When you connect for the first time

Go to the Group's intranet home page :

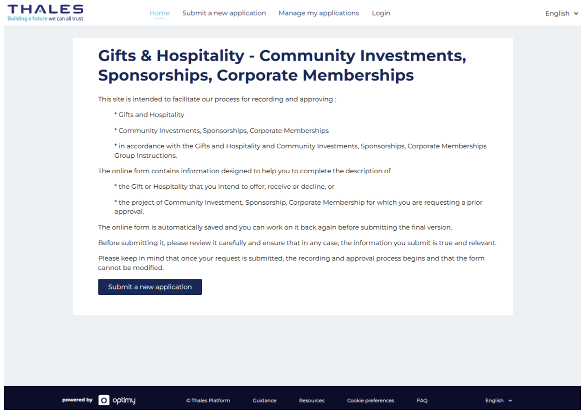


In the upper-right corner of the screen

- Click on My applications > All my applications > Group Applications
- Click on **Thales Gifts and Hospitality Platform**

The platform is accessible on Single Sign On (SSO) mode. ID and password are not required

[Address : https://thalesgroup.thales.optimytool.com/en/](https://thalesgroup.thales.optimytool.com/en/)



- Then select your cookies preferences
- You are automatically logged in

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III. Home page overview (1/2)

Home : contains an introduction to the platform

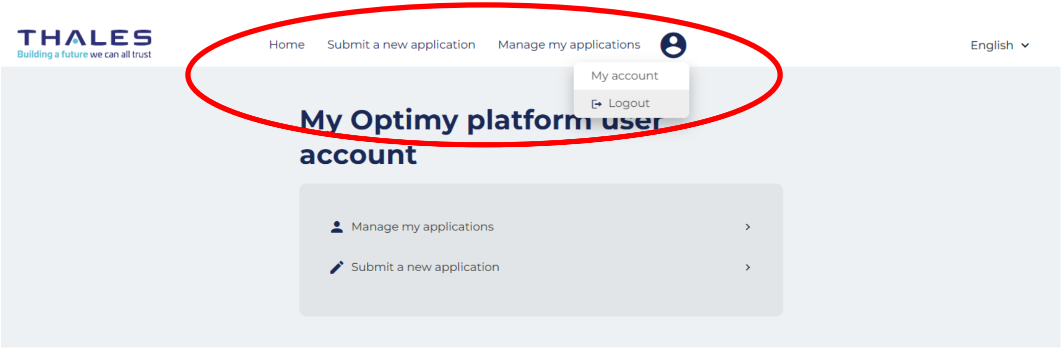
Submit a new application : Direct access to the form to fill in

Manage my applications : Direct access to previously submitted requests

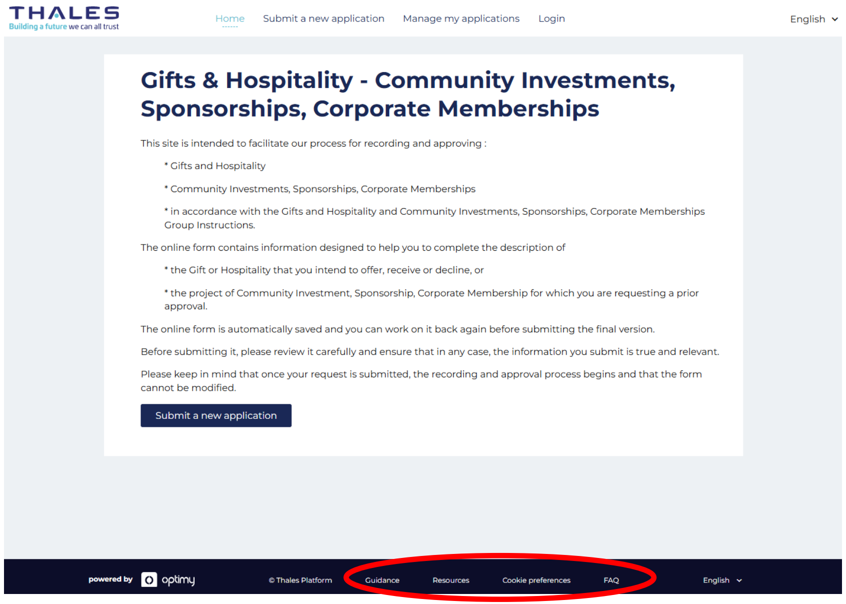
Profile icon : Contains the below menus. If you see this icon, it means you are logged in. Otherwise, you will see the “Login” button and still need to log in to access all the pages and submit a request.

My account : Information of your profile (submitted requests)

Logout : Manually logout from your account



III. Home page overview (2/2)



Guidance : Guidance for employees and line managers

Resources : Access to some key documents

Cookies : Information about the cookies used on the platform

FAQ : Frequently Asked Questions

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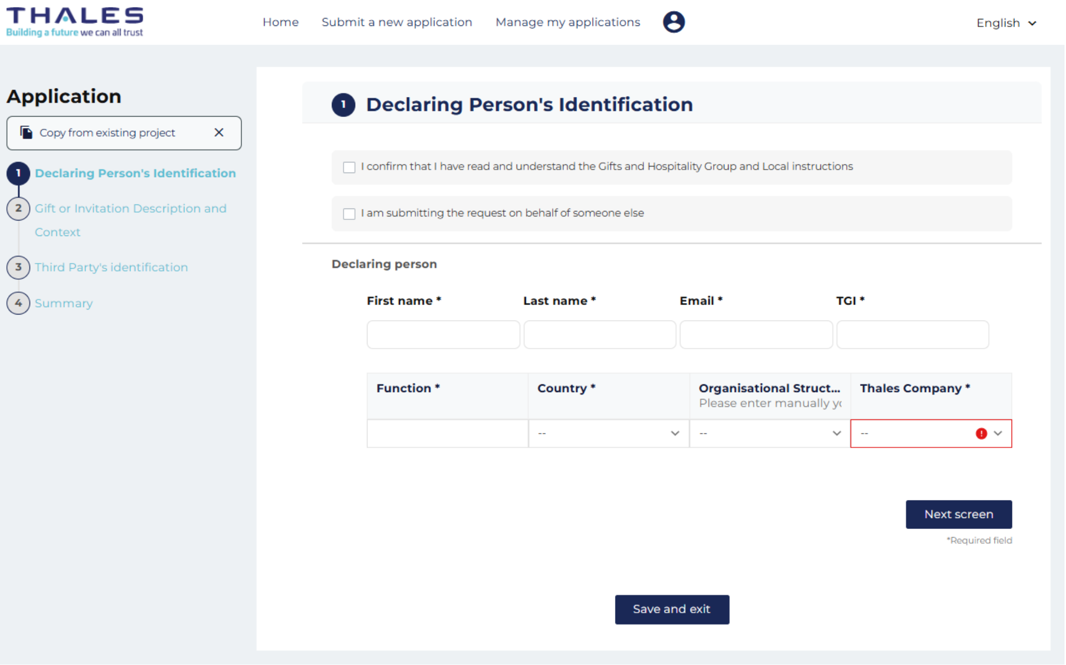
IV. How to submit a request ?

Click on “Submit a new application”

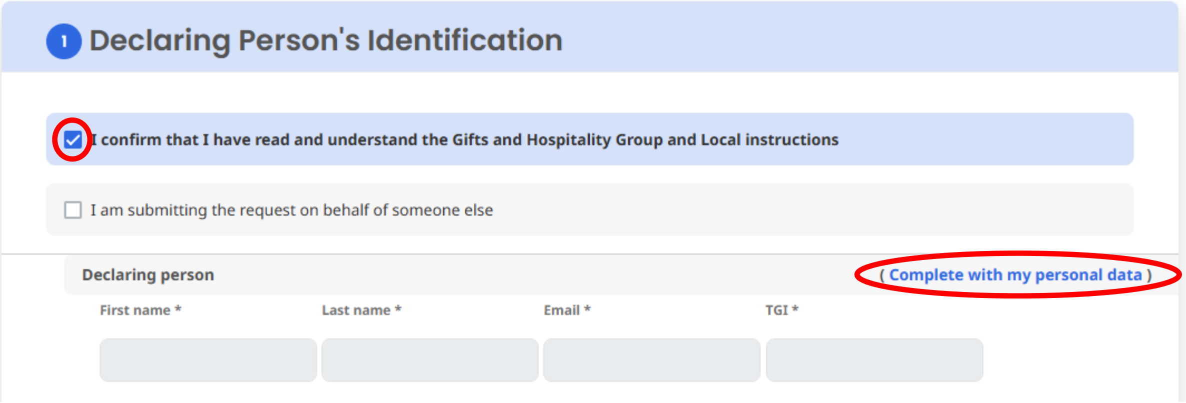
- You will reach the form to fill in unless you have already created a draft form (more details at page 26).



IV. How to submit a request ? Screen # 1 : Declaring Person's Identification (when declaring for yourself)

A. If you are submitting an application for yourself (1/2)

1. **Check the box** to confirm that you have read and understand the Gift & Hospitality Group and Local instructions
2. **Click on « complete with my personal data »** <u>**each time you submit a new application**</u>. The following fields are **automatically** inputted: First name, Last name, email, TGI, Function



If you are submitting an application for someone else: *Please refer to slides 11, 12 and 13 below*

IV. How to submit a request ? Screen # 1 : Declaring Person's Identification (when declaring for yourself)

A. If you are submitting an application for yourself (2/2)

3. **Input manually** the following fields:

- **Thales Company and Country**
- **Organisational entity**

Please complete as follows (This information will be recorded for your next request) :

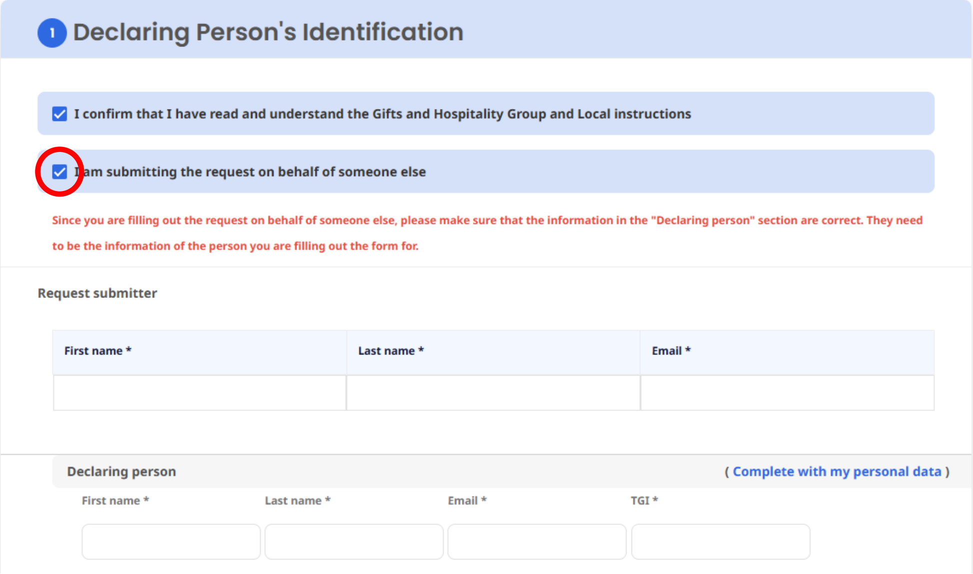
- If you belong to DGDI organization: please select DGDI
- If you are working for various GBUs in a Large Country: please select the relevant Large country
- If you are working for a given GBU : please select the relevant GBU
- If you are working at Thales (SA): if you belong to the HR function, please select Thales SA – HR. If not, please select Thales SA – excluding HR
- If you work at TGS: please select TGS
- If you are a Group Excom Member or a Large Country Director, please select a Group Excom Member or a Large Country Director

- **Line Manager's first name, last name and email address :**
  - Please enter manually these information. These information will be recorded for your next request.

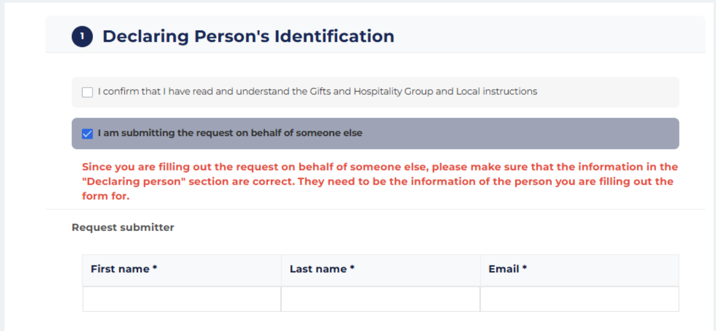
IV. How to submit a request ? Screen # 1 : Declaring Person's Identification (when declaring for someone else)

B. If you are submitting an application for someone else (1/3)

1. **Check the box** to confirm that you have read and understand the Gift & Hospitality Group and Local instructions
2. **Check the box** to indicate that you are submitting the request on behalf of someone else



If you are submitting an application for someone else (2/3)



3. Input **manually** your personal data as Request Submitter:

- ➢ **First name, Last name, email**

4. Input **manually** the information identifying the Declaring Person :

WARNING : Do not click on « Complete with my personal data »

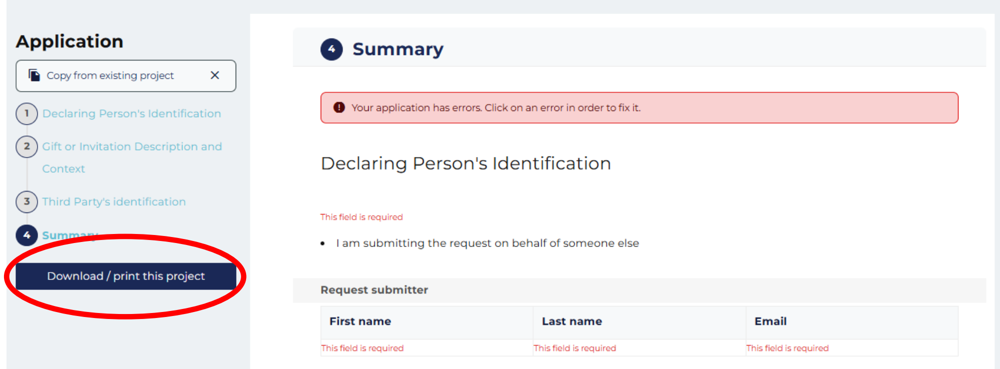
➢ ***If you are declaring on behalf of a Large Country Director or a member of the Group Executive Committee: when completing the field « organisational structure » please select « Large Country director » or « Group Excom Member » as appropriate*** *and refer to specific instructions sent to you as assistant to a « Large Country director » or a « Group Excom Member »*

IV. How to submit a request ? Screen # 1 : Declaring Person's Identification (when declaring for someone else)

Last steps of the submission if you are submitting an application for someone else (3/3)

5. Go to Screen #2 and input the information regarding the description of the Gift or Hospitality (see slides 15 and 16). Then Go to Screen #3 and input and the identification of the third party based on the information provided by the Declaring Person (see slide 18).

6. In the summary screen #4 , you may click on « **download/print the project** » to download the draft form and send it to the relevant Declaring Person to obtain validation prior to submitting the request at the bottom of the page.



IV. How to submit a request ? Screen # 2 : Gift or Invitation Description and Context

- **Name of your declaration :** *use this field to facilitate identification of a given request*

- **Are you giving or receiving a Gift or invitation ?**

- **Type of Gift or invitation**

☐ Gift ☐ Meal ☐ Entertainment ☐ Travel or Lodging expenses ☐ Visit of delegation ☐ Other

If your request relates to a Visit of Delegation, please select « Visit of delegation » instead of Travel and Lodging expenses. Please note that Visit of delegation (of public or private customers, suppliers) with payment of non-contractually agreed travel and/or lodging expenses is a Special Case that requires a Compliance approval review after approval by your Line Manager.

IV. How to submit a request ? Screen # 2 : Gift or Invitation Description and Context

Does your request include multiple beneficiaries ?

Please select Yes or No. If Yes, you will be asked to provide a list of all beneficiaries on the next page.

Estimated € Value per person

Please enter numbers only without comma or full stop

Start date of the event – End date of the event

If the type is « Travel or Lodging expenses » or « Visit of Delegation », the end date of the event shall be completed

Description

If relevant, please indicate the name, place and date of the event (local product show, demonstration, milestone of a signed contract, user's group, etc.) and provide a detailed program of the event.

Additional information

You can attach a photo (gift, proof of payment) or a background paper (e.g. program of the visit of a delegation)

*Click on **upload***

IV. How to submit a request ? Screen # 2 : Gift or Invitation Description and Context

> **Does one of the beneficiaries have a decision power in an ongoing RFP or program delivery ?**

This question is intended to address situation where a beneficiary has **a decision power in an ongoing RFP or program delivery** **in which the other party is involved.**

- Example: Beneficiary is a member of the selection committee assessing a tender in which Thales has submitted an offer (if you are receiving a Gift or Hospitality) or the third party's organization (if you are receiving a Gift or Hospitality) has submitted an offer.

- Example: Beneficiary is in position to participate to a decision aiming to cancel or reduce penalties or a decision in the frame of the contract acceptance procedure in the frame of a program delivery in which the other party is involved.

- **Is there a Third Party that is a public official or a PEP?**

Please specify if a Third Party is a Public Official or a Person Exposed Politically according the definition displayed in the online questionnaire

- **Please upload the full list of attendees/beneficiaries**

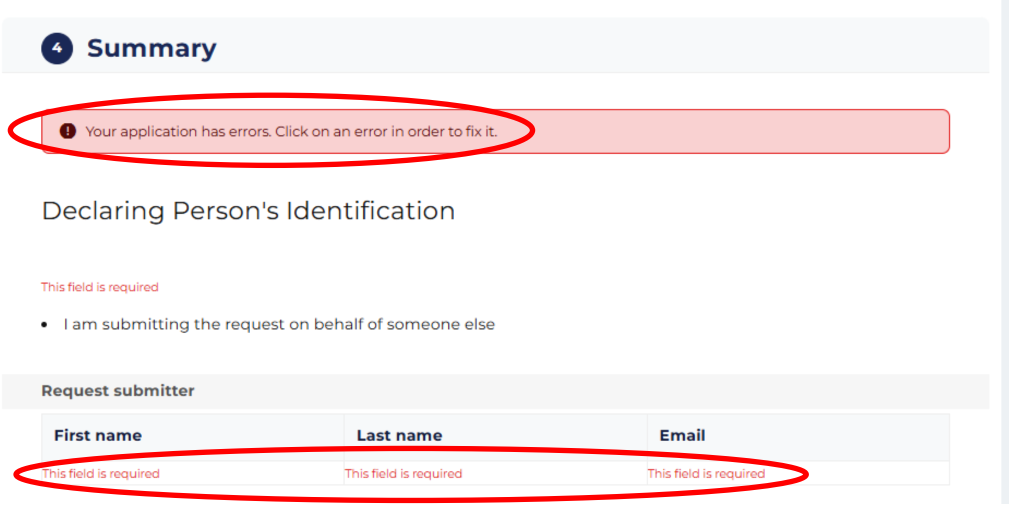
This question will appear if you selected « yes » to the question « Does your request include multiple beneficiaries ? »

- **Please give us the details of the beneficiaries who have a decision power in an ongoing RFP, or are Public official or PEP**

This question will appear if you have indicated that a beneficiary have a decision power in an ongoing RFP or program delivery or that a person is a public official or a PEP. Please specify what type of person they are, their names, surnames, function, name of organization and country. You may add up to 25 beneficiaries.

IV. How to submit a request ? Screen # 4 : Summary

- In the last screen, you will be able to read the summary of your submission before submitting and verifying that there are no errors (i.e. forgotten field).
- If there are no errors, click on “**Validate and send**” to confirm the submission of your request.
- If there are errors, the following messages are displayed to identify missing information



V. How to identify and understand the automatic notifications (1/3)

Once Requestor clicks on "Validate and send", the request is submitted via the platform to the person(s) that needs to validate : the Line Manager (LM).

Requestor and validators receive an automatic notification in their mail box coming from :

Thales <messaging@optimyapp.com>

At each step of the approval workflow requestor and validators who already made a decision are informed via an automatic notification which mentions the next step and the name of the next validator (if any).

Subject: Request pending for approval - Request reference 2024-00141 (Process 2 : approved by LM)

Please do not reply to this email as it is an automated email. If you have any questions or concerns you can email the following email address : support.thales.ciscm@optimy.com

Dear William de Woot,

Your request is recorded under reference 2024-00141 (Process 2 : approved by LM).

Considering the estimated value declared, a prior approval from your Line Manager (Déborah Havenith) is required.

Best regards,

Thales Gift & Hospitality Platform

V. How to identify and understand the automatic notifications (2/3)

At the end of the approval workflow, the final notification is sent to requestor- with a copy to the various validators. It mentions in the subject of the notification if the request is approved or rejected « Approved request / Rejected request):

- ✓ This notification in PDF form includes all decisions made regarding the request, the identity of the validators, the date and content of each decision made.
- ✓ In case of an approved request, this PDF document is not automatically sent to the accounting department. You have to forward it to the accounting department together with the payment request.

V. How to identify and understand the automatic notifications (3/3)

Tips !

To find a notification in your mailbox:

- Use the search function in all sub-folders of your mailbox and search the reference id of the request ie. « YYYY-XXXXX » or the name of the request.
- Check in you spams and deleted items folders

If you definitely cannot find a notification in your mailbox:

- Click in the link contained in a previous request for approval that you have handled as Line Manager or Compliance officer, as appropriate, you will then be able to access the relevant validation interface and to handle the open requests **(be aware that if you are a validator at multiple levels or for both workflows, the links are different for each combination);** or

- If you have saved the links of your various validation interfaces as favorites in your browser, access to the validation interface via the relevant favorite; or

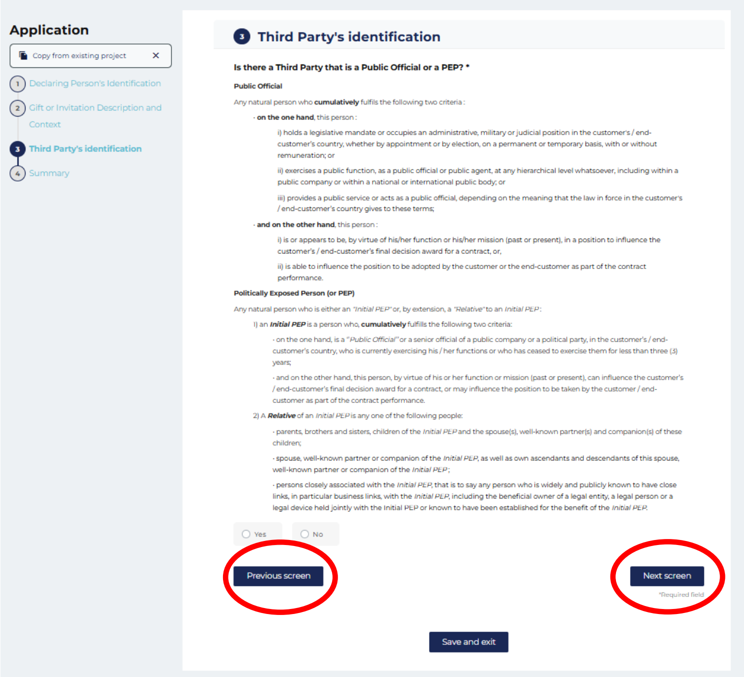
- Ask your Compliance Officer for a copy of the notification as they either have access to the back office or can ask the Chief Compliance Officer; or

- As a last resort, you can also contact the support email : support.thales.ciscm@optimy.com

VI. Key actions you can do (in a form)

Navigate from one screen to another

- Go to the next screen by clicking on the button "**Next screen**" at the bottom of the page (same action with the button "**Previous screen**" to go to the previous screen once in screen 2 or more)



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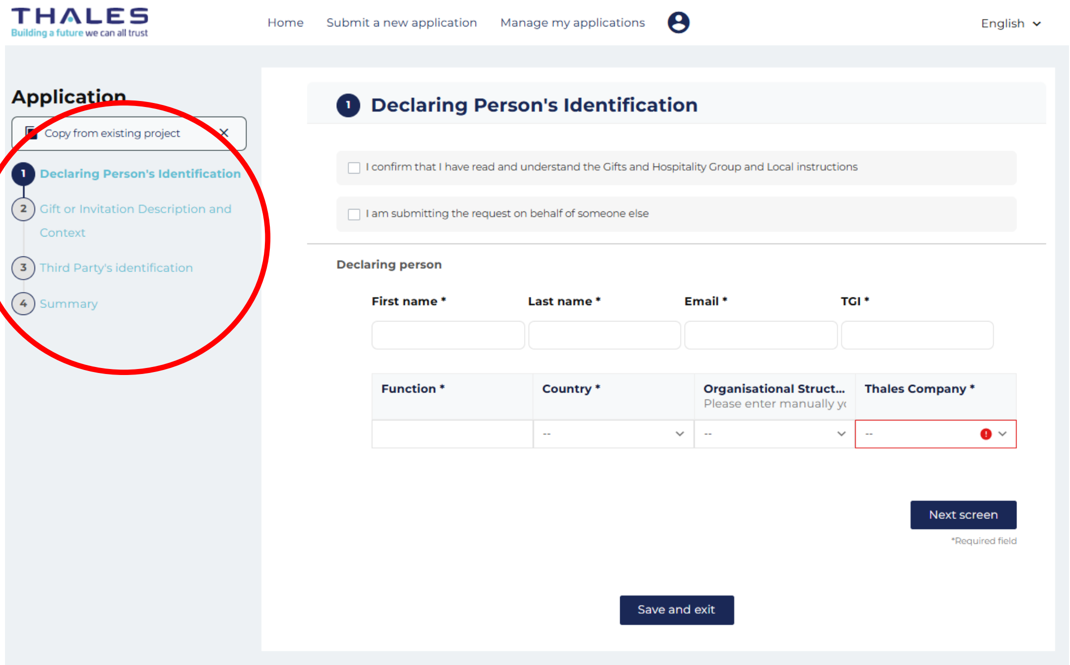
VI. Key actions you can do (in a form)

Navigate from one screen to another

- You can also navigate through the screens thanks to the screen list on the left side



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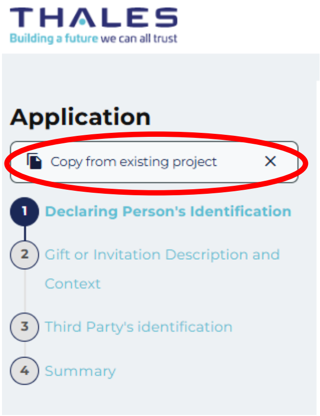
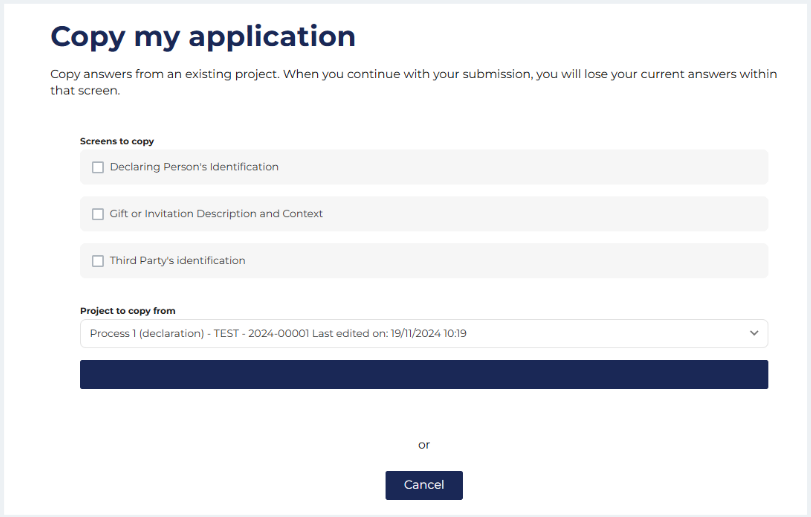
VI. Key actions you can do (in a form)

Duplicate a form (either fully or in part)

- If you have submitted a similar request in the past, you can copy it by clicking on "**Copy from existing project**" on the left side. After clicking on the button, you will be redirected to a page where you will be able to **choose which request to copy from and which screens.** Once it is copied, you can still modify anything in any screens before submitting your application

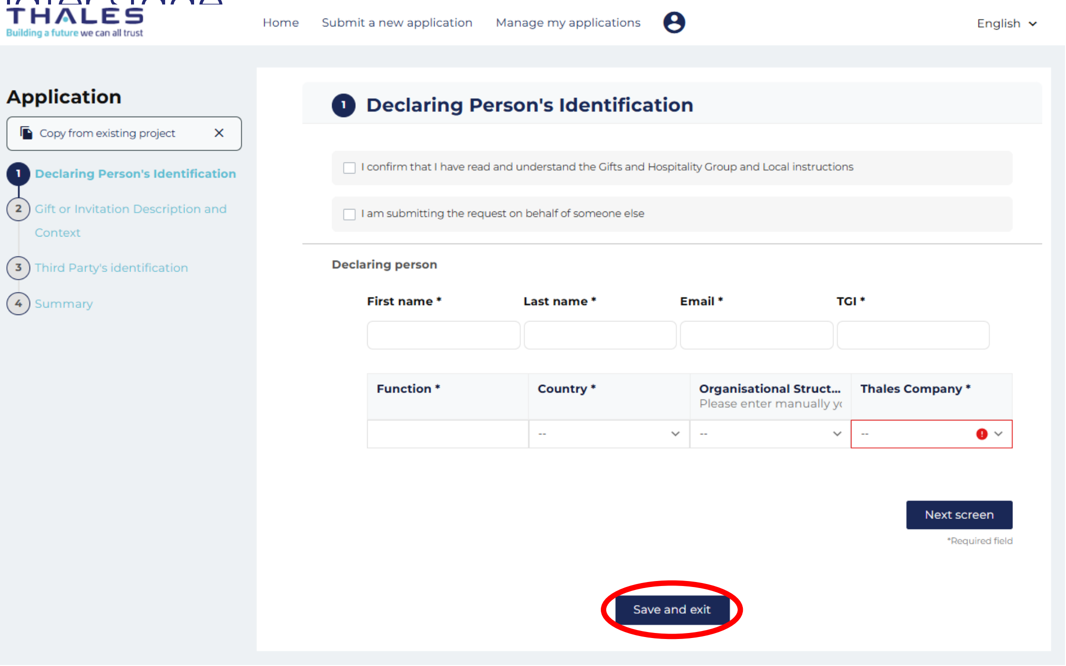




VI. Key actions you can do (in a form)

Save a form

- You can click at any time on "**Save and Exit**" to exit and continue the submission of your request at a later stage



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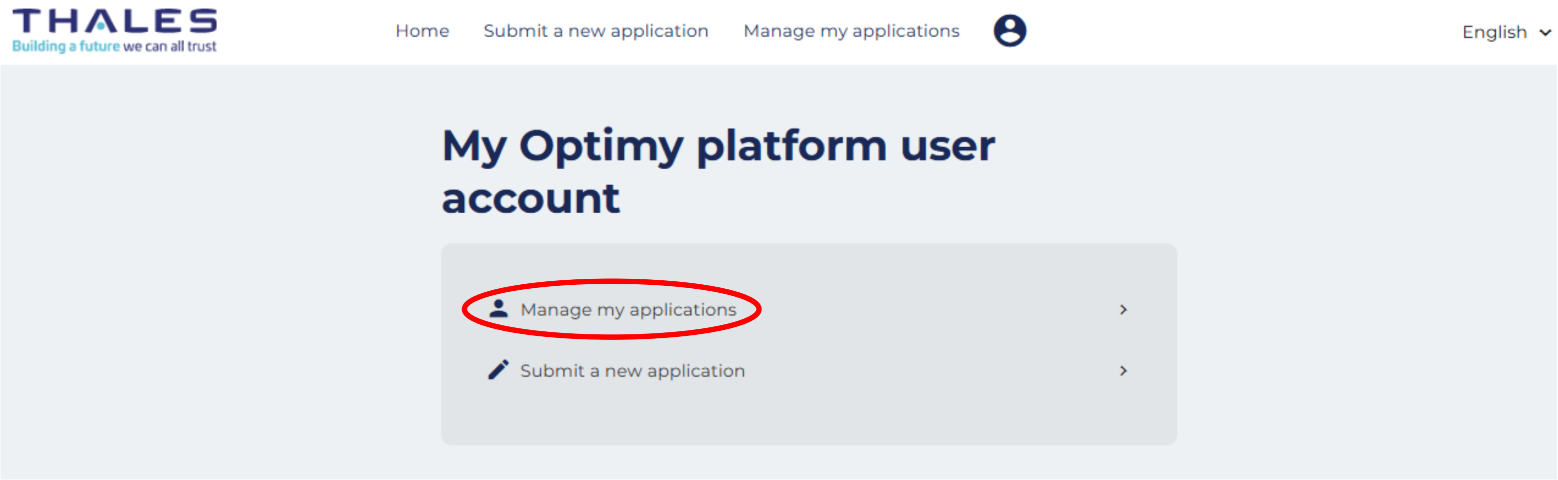
VI. Key actions you can do (from “My account” page)

Manage my applications



VI. Key actions you can do (from “manage my applications” page)

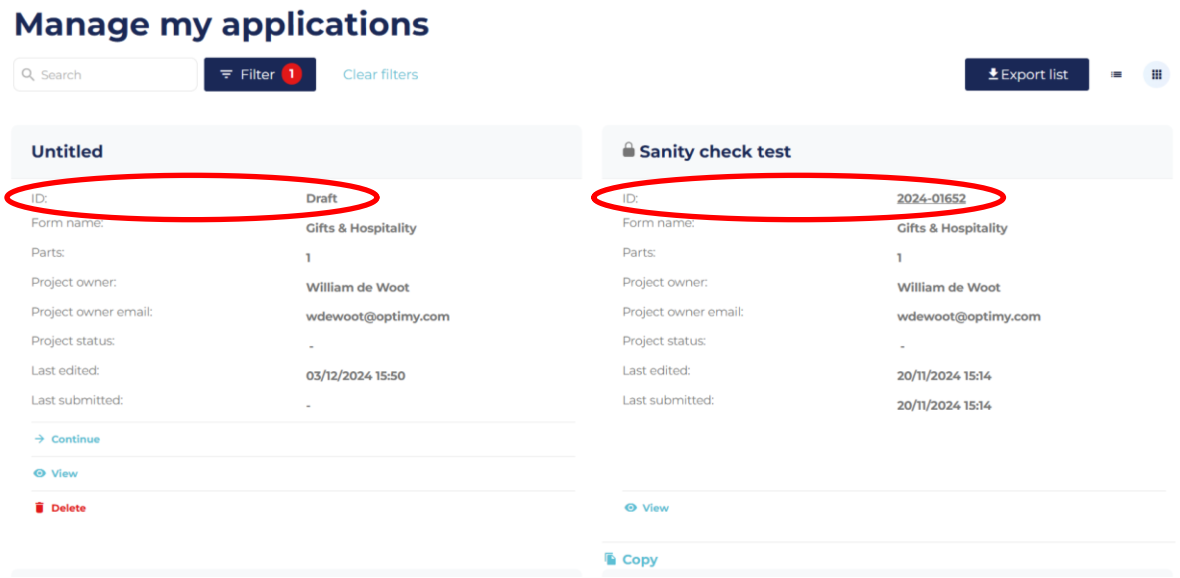
Manage my applications

- Click on “**Filter**” to apply filters allowing you to choose between G&H or CISCM projects
- Click on “**Export list**” to export the list of requests in Excel (only list view data included)
- Switch between list view and card view thanks to the icons on the right side

VI. Key actions you can do (from “manage my applications” page)

Manage my applications

- Once in card view, you can see whether your application form is a draft (**ID : Draft**) whether it is **already submitted (ID : Year-XXXXX)** .



Manage my applications

- You can also **check at which stage the requests stands** (**Project status** = Pending X approval/Approved by/Rejected by)

Manage my applications

Search | Filter 1 | Clear filters | Export list

ID	Project name						Project status	Last edited	Last submitted	Me
Draft	Untitled		G...	1	w...	W.	-	03/12/2024 15:50	-	-
2024-016...	Sanity check test		G...	1	w...	W.	Approved by Line Manager and Compliance Officer	20/11/2024 15:14	20/11/2024 15:14	-
2024-016...	Sanity check test		G...	1	w...	W.	Pending Line Manager approval	20/11/2024 09:18	20/11/2024 09:18	-
2024-016...	Sanity check test		G...	1	w...	W.	Pending Line Manager approval	20/11/2024 08:12	20/11/2024 08:12	-
2024-016...	Process 2 : Pending CO...		G...	1	w...	W.	Rejected by Line Manager	19/11/2024 20:21	19/11/2024 20:21	-

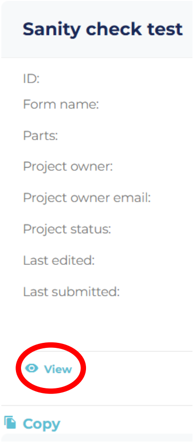
As a reminder, all stakeholders of the project are notified at every step of the process. This notification also includes the name of the next appointed validator should it be applicable.

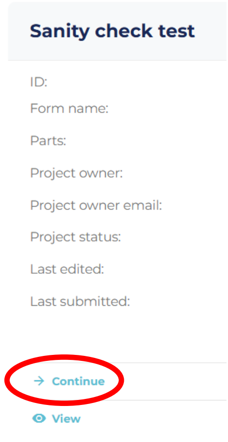
VI. Key actions you can do (from “manage my applications” page)

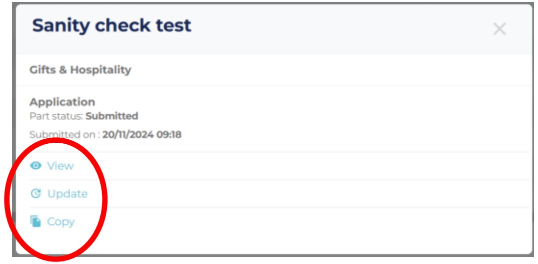
Manage my applications

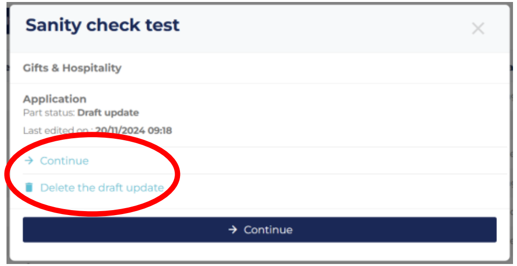
If a request has not yet received a final decision or hasn’t been modified more than 2 times, the project submitter may click on “Update” to access again his request and modify any data he/she wishes to modify.

If an update has been started but not submitted, requestor can click on “Continue” to finish and submit the draft of the update or click on “Delete the draft update” to cancel the ongoing update. (In list view, you can click on the 3 dots then “View” or just simply click on the line to open the popup given you the above possible actions).



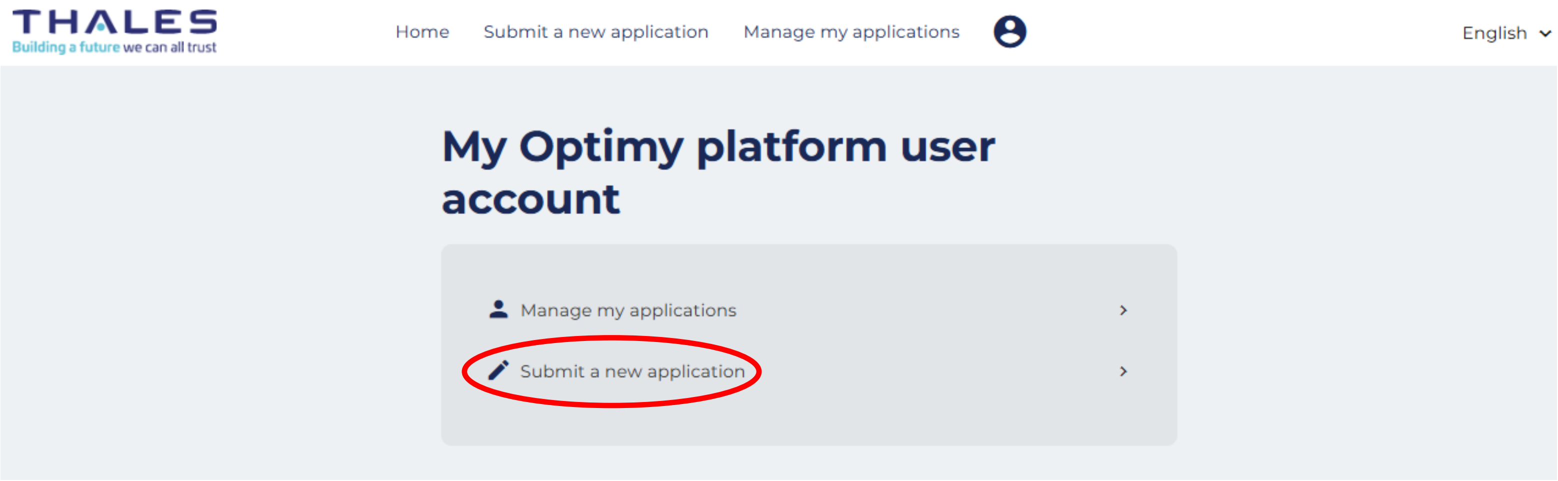






VI. Key actions you can do (from “Manage my applications” page)

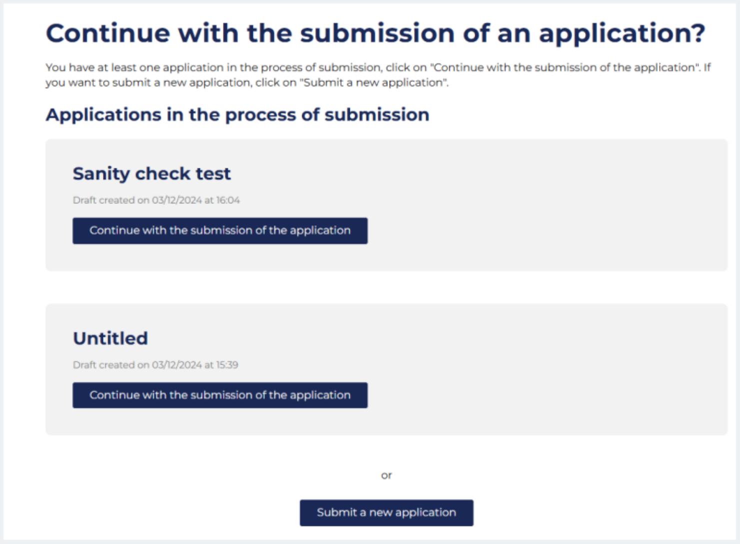
Click on « Submit a new application »



VI. Key actions you can do (from “Manage my applications” page)

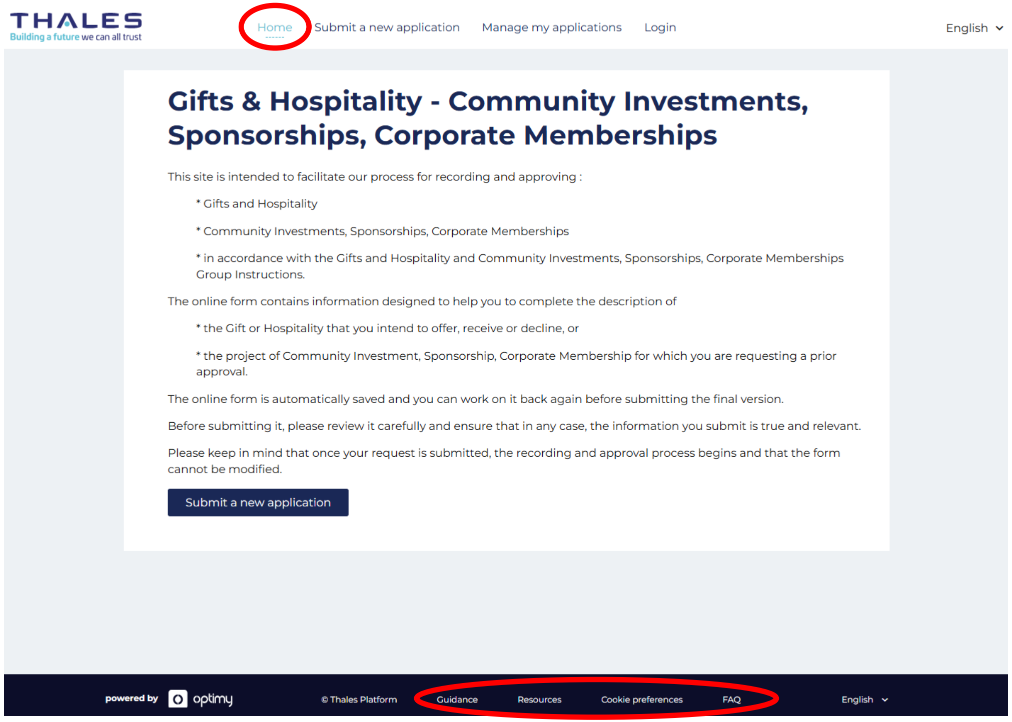
Submit a new application

- If you have already created a draft form, the following page is displayed. On this page you can see when the draft was created or last updated. You can then decide whether to continue the draft (“**Continue with the submission of the application**”) or to start a new request by (“ **Submit a new application** “)



VII. Detailed views of tabs available from the home page

Home : contains an introduction to the platform



VII. Detailed views of tabs available from the home page

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Home   Submit an application   My account   Logout

Guidance

Guidance to employees

Please ensure that Gifts and Hospitality whether given or received:

1. Are given or received for a legitimate business purpose;
2. Comply with the provisions of the Gifts and Hospitality Group (and local, if any) instruction;
3. Comply with applicable laws and regulations, including applicable anti-corruption and influence peddling laws;
4. Are socially acceptable. This means that gifts and hospitality, whether given or received, must cumulatively:
   (i) **occasional**.
   (ii) of **reasonable nature and value.**
   (iii) **Have no impact on the Thales Group's reputation** if they are made public.

Employees must be sure that Gifts and Hospitality are not given to public officials or politically exposed persons with the intention of obtaining or maintaining a contract or influencing or attempting to influence an official decision. **Giving a Gift or Hospitality to public officials or politically exposed persons during the bid process may be interpreted as an attempt to influence a decision and is therefore strictly prohibited.**

Keep in mind that the following are prohibited:

Guidance to employees

such payment is not contractually agreed.

Guidance to managers

Please keep in mind that any decision-making on Gifts or Hospitality shall be based upon an**assessment of present and past circumstances combining nature, frequency and value of Gift or Hospitality.**

1. Check that Gifts and Hospitality are justified by a legitimate business purpose; They must never be aimed at obtaining or offering an undue advantage or influencing a decision, or give the appearance of such an aim;
2. Ensure that Gifts and Hospitality are not given to public officials or politically exposed persons with the intention of obtaining or maintaining a contract or influencing or attempting to influence an official decision. **Giving a Gift or Hospitality to public officials or politically exposed persons during the bid process may be interpreted as an attempt to influence a decision and is therefore strictly prohibited**.
3. Consult your Compliance officer in Special Cases, which require special attention, i.e.:
   (i) Gifts and Hospitality given to (or by) public officials or politically exposed persons ;
   (ii) Visits of delegations (public or private customers, suppliers) with payment of non-contractually agreed travel and/or lodging expenses ;
   (iii) Any circumstance preventing the strict application of the rules laid out in the Gifts and Hospitality Group Instruction.

Guidance to managers

VII. Detailed views of tabs available from the home page

Direct link to

- Thales Code of Conduct
- The Group's Gifts and Hospitality instruction
- This User Guide
- A video tutorial of the platform
- The list of current thresholds

Resources

Please refer to the following resources and contact your local compliance officer if you need further information.

- Thales Code of Conduct (EN) – Prevention of Corruption and Influence Peddling

Gifts & Hospitality (G&H) :

- Group Gift and Hospitality instruction (EN)

- Gift and Hospitality user Guide (EN)
- Video tutorial (EN)

- Thresholds

Community Investment, Sponsorship & Corporate Membership (CISCM) :

- Group Community Investment, Sponsorship & Corporate Membership instruction (EN)

- General guidelines Community Investment, Sponsorship & Corporate Membership instruction (EN)

- Community Investment, Sponsorship & Corporate Membership user guide (EN)
- Video tutorial (EN)

- TPIA Appendix 3 (EN)

Home

VII. Detailed views of tabs available from the home page

FAQ : Frequently Asked Questions

FAQ

I can't connect/log to the application –

In order to connect to the application, you need :

- An access to the internet
- Via a web browser (Edge by default); and
- The capacity of being authenticated on the intranet using your Thales smart card / token. As a reminder, when you are authenticated on the Thales intranet, your first name appears on the screen, at the top right of your screen.

How can I read the first part of my project I submitted again? +

When does the autosave apply ? +

Standard process

- Once a **request for approval** is submitted to the designated Line Manager, he/she receives an email notification with the link to the pending request.

1. The Line Manager must **click on the link to access to the pending requests** and make a decision.

Dear,

The request reference 2021-00176 requires your approval.

You may approve, reject or seek your compliance officer's opinion if you are in presence of a Special Case as defined in the Gifts and Hospitality Group Instruction.

When making a decision regarding this request, you confirm that you have reviewed this request according to the Gifts and Hospitality Group Instruction.

To access your online interface, please click on the following link : https://thales.customers-api.optimytool.com/lm/def502000dce9cedd07c49a3799359e25c2b463752c10de30609f6701ad717ab00aef9046f8f870eb9949e73aa3002823d7053d1ad895cc45c968f8eb06

Kind regards,

VIII. Line Manager’s interface

2. Line manager is automatically redirected to a dedicated interface showing **Open requests.**

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Open requests Closed requests [redacted]

Show 10 entries Global Search :

REQUEST REF	DECLARING PERSON	GIVING/RECEIVING	ESTIMATED € VALUE PER PERSON	THIRD PARTY	RED FLAGS	PDF	DECISION
Request ref	Declaring person	- Giving/Rece	Estimated € value	Third Party	- Red flags -		
2024-00123	William de Woot	Receiving	250.00 €	Optimy	No		Approve Need CO approval Refuse Ask requestor more information

From his/her dedicated interface, Line Manager may also consult **closed requests**

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VIII. Line Manager’s interface

✔ Approve

When the Line Manager clicks on the « Approve » button, the Declaring Person (and the Request Submitter if relevant) receives an automatic notification including the updated form.

If the « Approve » button is not displayed, this means that advice of the Compliance Officer is required.

? Need CO approval

When the Line Manager clicks on the « Need CO approval » button, this means that he/she approves the Gift or Hospitality and has to obtain the Compliance Officer approval. In this case, the Line Manager shall designate manually the Compliance officer.

✖ Refuse

When the Line Manager clicks on the « Refuse » button, the Declaring Person (and the Request Submitter if relevant) receives an automatic notification including the updated form.

✉ Ask requestor more information

When the Line Manager clicks on the « Ask requestor more information » button, a pop-up will open allowing the validator to send an email to the requestor (more info at the next slide)

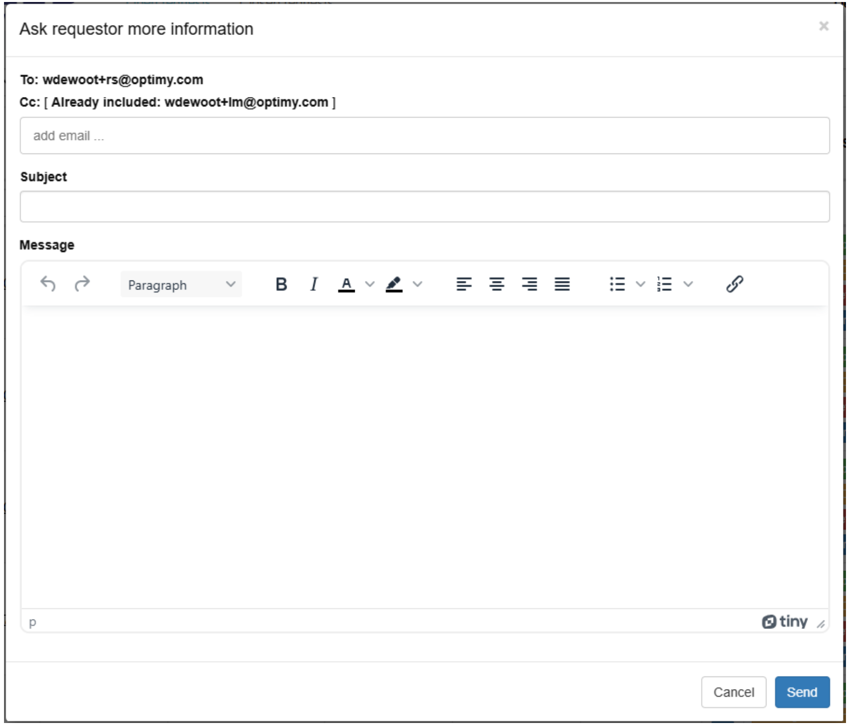
VIII. Line Manager’s interface

Email pop-up

The field « CC » allows you to add multiple people in cc of the email to send. Be aware the email of the validator (sender) is automatically put in CC.

The fields Subject and Message allows you to manage the content included in the email.

WARNING : Answers will not be received in the validation platform and no history will be stored there.



VIII. Line Manager's interface

- The following signs enable the Line Manager to rank the information displayed in a given column in ascending or descending order

- If the Red flags column displays a Yes: this means that the beneficiary is a Public Official or a PEP, or that Beneficiary has a decision power in an ongoing RFP or program delivery in which the other party is involved, or that Beneficiary has already received of offered a Gift or Hospitality from or to the same person.

REMINDER:

Line Manager should save the link of the interface in the Bookmark bar of their browser for easy access to their platform or, should they prefer, keep an email with the link in their inbox.

IX. Compliance Officer's interface

Standard process

- If the Line Manager clicks on "**Need CO approval**", the designated Compliance Officer receives an email notification with the link to the pending request.

The request reference 2021-00084 requires your advice.

You may approve or reject this request by accessing your online interface available at the following link : https://thales.customers-api.optimytool.com/co/def50200da931fc0d2250115f6a69fcedaf26023ddd21806857a8c00c1dd6dd0b8347a3ba250a2b4ce8c1bc1d0cf86780404f161ef5708d2a519bc9ac5a8

1. The Compliance Manager must **click on the link to access to the pending request for advice** and make a decision.

IX. Compliance Officer's interface

2. Compliance officer is automatically redirected to a dedicated interface showing **Open requests.**

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Open requests   Closed requests   [redacted]

Show 10 entries   Global Search :

REQUEST REF	DECLARING PERSON	GIVING/RECEIVING	ESTIMATED € VALUE PER PERSON	THIRD PARTY	RED FLAGS	PDF	DECISION
Request ref	Declaring person	- Giving/Rece	Estimated € value	Third Party	- Red flags -		
2024-00106	William de Woot	Receiving	150.00 €	Optimy	No		✔ Approve ✖ Refuse ✉ Ask requestor more information

Showing 1 to 1 of 1 entries   Previous 1 Next

From his/her dedicated interface, Compliance Officer may also consult **closed requests**

VIII. Line Manager's interface

✔ Approve

When the Compliance Officer clicks on the « Approve » button, the Line Manager, Declaring Person (and the Request Submitter if relevant) receive an automatic notification including the updated form

✖ Refuse

When the Compliance Officer clicks on the « Refuse » button, the Line Manager, Declaring Person (and the Request Submitter if relevant) receive an automatic notification including the updated form.

✉ Ask requestor more information

When the Compliance Officer clicks on the « Ask requestor more information » button, a pop-up will open allowing the validator to send an email to the requestor (more info at the slide 40)

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IX. Compliance officer's interface

- The following signs enable the Compliance Officer to rank the information displayed in a given column in ascending or descending order

- If the Red flags column displayed a Yes : this means that the beneficiary is a Public Official or a PEP, or that Beneficiary has a decision power in an ongoing RFP or program delivery in which the other party is involved, or that Beneficiary has already received of offered a Gift or Hospitality from or to the same person.

REMINDER:

Compliance Officer should save the link of the interface in the Bookmark bar of their browser for easy access to their platform or, should they prefer, keep an email with the link in their inbox.

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X. Useful information

In case you have misplaced an email that you need to receive again, you can reach out to your Compliance Officer who can retrieve it from the admin interface.

For any other identified technical issues or any technical support request, you can contact the support line at support.thales.ciscm@optimy.com. When doing so, please make sure to detail :

- The **Reference Id** (YYYY-xxxx) and **name** of the request
- A **description of the problem**;

And attach :

- **screenshots** showing the error message if any
- the **notification received**.