

# CODE OF ETHICS



The culture of Sodern, shaped by its history and the passion that characterises its teams, is accompanied by principles that form the ethical foundation of our society. Respect for these principles, which are inseparable from our corporate culture, is a priority and cannot be compromised.

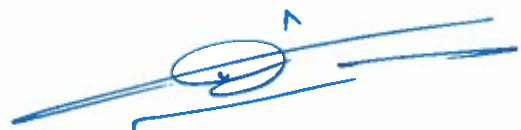
The expertise and motivation of its employees are Sodern's main strengths. These forces can only be preserved in a framework that promotes individual development and enriches the diversity of talents. I also think it's vital that we maintain an open and constructive dialogue within the company. Because we're passionate about the future, we're also fully aware of the ecological imperative that requires us to act today so we don't compromise tomorrow.

As a state partner company, strategically located in the National Defence structure, Sodern is fully aware of the duty of discretion and the imperative of reliability that weigh on it. In addition, the protection of assets and information, as well as the search for total quality, are at the heart of our concerns.

A fully customer-oriented company, with the satisfaction of our customers as our main objective, Sodern intends to implement an irreproachable business practice. Respect for our customers and the chain of subcontractors, transparency and the desire to be a loyal competitor vis-à-vis our competitors guide our daily action.

These principles help to maintain our tradition of integrity, a source of pride for our teams, and fit perfectly with our quest for efficiency and performance.

You can count on my commitment, as well as that of all Sodern employees, to preserve these values and ensure that they are unconditionally observed.



Franck Poirier

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## 1. IMPLEMENTING AN ETHICAL BUSINESS PRACTICE

Sodern intends to implement an irreproachable business practice. Our approach is based on respect for the customer and the chain of subcontractors, and on the desire to be a loyal competitor and a responsible actor in environmental and social terms.

### 1.1 ZERO TOLERANCE FOR CORRUPTION

Our strong reputation for integrity is one of our most valuable assets, which could be compromised by any ethical misconduct by one of our employees or a third party. Thus, we consider the fight against corruption as a critical issue for Sodern.

We do not tolerate any practice that can be equated with an act of corruption. We refrain from offering, attempting to offer, authorising or promising any type of bribe, facilitation payment, or retrocommission, to any public official or private body for the purpose of obtaining or maintaining a contract or an undue advantage. Similarly, we do not solicit or accept any bribe or retro-commission from any public official or private organisation.

Furthermore, we never engage a third party to perform any action that we cannot ethically or legally undertake ourselves.

For any need, query or request, our employees are invited to systematically turn to our *Compliance Officer*.

### 1.2 GIFTS AND INVITATIONS

Commercial gestures, such as gifts and invitations offered to or received from customers, suppliers and other business partners, must reflect normal business relationships. In no case can they influence or give the impression of influencing a commercial decision.

Common sense and caution are always appropriate in these situations. In case of doubt about whether to offer or accept a particular gift, our employees must seek the advice of our *Compliance Officer*.

### 1.3 IDENTIFYING AND MANAGING CONFLICTS OF INTEREST

As part of our efforts to protect the reputation of Sodern and our shareholders, we avoid situations where our personal interests interfere, or may appear to interfere, with our ability to perform our duties without bias. If we cannot avoid a conflict of interest, we inform our line manager and the *Compliance Officer*.

We exercise particular vigilance when recruiting employees who are, or have been, public officials or civil servants, in accordance with French regulations on the ethics of public employees.

### 1.4 ANTI-MONEY LAUNDERING MEASURES

Sodern is committed to complying with applicable anti-money laundering laws. As a result, Sodern conducts its business only with reputable customers, whose activities are legal and whose funds have, to our knowledge, a legal basis.

### 1.5 EXERCISING FAIR COMPETITION

We believe in fair competition and must act in strict compliance with the competition laws (so-called "anti-competition rules") applicable in the countries where we operate. These laws prohibit agreements or behaviours that may restrict or distort competition.

We believe in fair competition and act in accordance with, firmly excluding any agreement, behaviour, exchange or disclosure of commercially sensitive information about competitors, customers or suppliers that may restrict or distort competition or trade.

### 1.6 RESPECT FOR OUR CUSTOMERS

We are committed to treating all our customers honestly and fairly, regardless of the size of their business, and to honouring our contractual commitments.

The operational independence of Sodern has been guaranteed by its main shareholder, which demonstrates our strict neutrality vis-à-vis the contractors of the space domain and our pledge to preserve the confidentiality of our commercial exchanges.

### 1.7 OUR COMMITMENT TO PRODUCT QUALITY AND SAFETY

We do not accept any concessions regarding the quality or safety of our products. Maintaining high product safety standards is in our best interest, as it is for our customers and the aerospace industry in general.

We comply with all the rules and procedures relating to quality controls that govern our responsibilities.

The safety and quality of products depend largely on feedback. In this way, we transparently report anomalies or process deviations, stop and solve any quality and safety problem, and then propose appropriate prevention and improvement measures.

Sodern is ISO 9001 and EN 9100 certified.

### 1.8 COMPLYING WITH EXPORT CONTROL REGULATIONS

Sodern buys and sells products, equipment, services and information worldwide. We possess critical know-how, which is our main asset and is of strategic interest to our customers, especially for the French State, in view of the dual nature of our activities. As a result, we are aware of the need to limit our exposure to the risks associated with our import and export activities. We comply with the export control procedures and make sure that we are in good standing with the regulations in force.

#### 1.9 COMPLYING WITH THE RULES IN DEFENCE MATTERS

Due to our defence-related security activities, it is vital that we strictly adhere to all applicable rules and regulations.

In particular, we take special care and vigilance to protect information classified by the State and that which requires specific authorisation.

Our employees are informed that they have the duty to report any incident or misuse, real or presumed, related to this information, material or data to our Security Officer.

#### 1.10 COOPERATING WITH THE AUTHORITIES

We comply with French legislation and cooperate in complete transparency with the competent authorities.

If they receive any regular request from a public official for an inquiry or a request for information, our employees are invited to inform the relevant staff, who will coordinate the processing.

Sodern is committed to working closely with and continuously informing public authorities, including at the local level, to ensure that its activities, particularly those involving nuclear energy, are strictly safe for people and the environment.

#### 1.11 TREATING SUPPLIERS AND SUBCONTRACTORS FAIRLY

Suppliers make a considerable contribution to the value of Sodern's products and therefore play a major role in customer satisfaction. We are committed to establishing equitable relationships with our suppliers and subcontractors, and to building relationships with them to achieve mutually beneficial goals. This will involve promoting the exchange of best practices and sharing synergies as appropriate.

Sodern ensures that relationships with all suppliers are managed in a fair and consistent manner. We have a duty to ensure that disputes with suppliers are always resolved with the utmost professionalism, and that our selection of suppliers only takes into account the interests of the company.

By committing ourselves to a responsible purchasing strategy, our goal is to build long-term relationships with the best suppliers who have adopted the highest standards of integrity. We expect our suppliers to understand, share and comply with our business ethics principles as set out in our Ethical Purchasing Charter. Suppliers may need to demonstrate the application of these principles, including business ethics, anti-corruption measures, human rights, labour standards and environmental commitment.

#### 1.12 MAINTAINING RELATIONSHIPS OF TRUST WITH OUR SHAREHOLDERS

We maintain an open dialogue with our shareholders, and exchange information about our activities and objectives in a spirit of transparency, while ensuring the confidentiality of our customers' data and our commercial exchanges.

### 1.13 ENVIRONMENTAL FRIENDLINESS, (ECO-EFFICIENCY - SUSTAINABLE DEVELOPMENT)

We recognise our responsibility to the global community to protect the environment.

Our neutron activities involve particular risks for the environment. We therefore commit ourselves to taking all necessary measures to completely neutralising these specific risks. It is vital that we strictly adhere to all applicable nuclear safety rules and regulations that flow from our operations.

Our employees are informed that they have the duty to report any risk situation or incident to the person in charge of radiation protection.

Beyond these particular risks, the environmental issue is taken into account in all our decisions, in order to ensure our eco-efficient nature.

Thus, our choices relating to infrastructure management, waste management, manufacturing procedures, and even paper management take the environmental dimension into consideration.

## 2. PROTECTING ASSETS AND INFORMATION

*It is our duty to protect the tangible and intangible assets of Sodern, its customers and partners. We must ensure that none of these assets are stolen, damaged, used or destroyed in an inappropriate manner. We must also be aware of our responsibilities when we access, use, modify, save or communicate any of Sodern's assets.*

### 2.1 PROTECTING ASSETS

The protection of our employees, goods, information, skills and know-how is essential for building trust and maintaining our competitiveness. Information and know-how are major assets of Sodern, and we protect them accordingly.

We treat all goods entrusted to us in a professional, safe, ethical, legal, productive and professional manner.

Access to confidential information is strictly regulated on a "need to know" basis. This information can only be communicated to colleagues or to officially authorised third parties who request it for legitimate business purposes or when required by law.

We are invited to develop innovative solutions for our products, services and business models. We make sure at all times that we secure and protect Sodern's intellectual property.

### 2.2 MAINTAINING THE ACCURACY OF MANAGEMENT DOCUMENTS

Our customers, shareholders and other stakeholders rely on the precision and accuracy of the information contained in our documents. We make sure that the information we provide is accurate, up-to-date, complete, correct and understandable.

When we draw up our financial documents, we comply with Sodern's internal control procedures and communicate transparently with the statutory auditors. We refrain from creating or participating in the creation of documents that may mislead readers or obscure any unlawful activity.

We are required to maintain and destroy the records in accordance with the deadlines and procedures for the retention of the data. If you have any questions regarding the length of time a document is to be kept or the appropriate method of destruction, you should contact a supervisor or the legal department.

### 2.3 PROTECTING THIRD PARTY INFORMATION

Our customers, suppliers and other partners often give us exclusive and confidential information about their activities. As a reliable partner, we must treat the information of third parties in accordance with their confidentiality conditions and in strict compliance with all applicable laws and regulations.

Access to information classified by governments requires specific authorisations according to its level of sensitivity. Any exchange or transmission of information or classified material must be strictly in accordance with the applicable security process. Any actual or suspected abuse or misuse must be reported immediately to the Security Officer.

### 2.4 TRADING SHARES

We do not disclose information that may affect the value of the share price of our Sodern share chain until it has been disclosed to the public.

In accordance with the laws governing insider trading, we are not allowed to buy or sell shares of a company when we have internal or privileged information about the company. Similarly, we do not share internal or privileged information with third parties, including our colleagues, family members and friends.

### 2.5 MANAGING INTERNAL AND EXTERNAL COMMUNICATION

Sodern's reputation is an extremely important asset. It is therefore crucial for us to promote and protect our image. This issue is an extremely important one, as our image can affect that of our customers, partners and shareholders. We must ensure the accuracy of the information that we disseminate to the public

Only designated individuals can respond to requests for formal information from outside, especially the media.

Sodern employees are not allowed to communicate information or to engage in social networking activities on behalf of Sodern. Sodern's participation in social networks and, more generally, Sodern's external communication is managed by the Directorate for Communication.



### 3. LISTENING TO OUR COLLABORATORS

*Our working relationship is based on respect, honesty and loyalty. We encourage employee innovation and commitment and are committed to maintaining high standards of quality, health and safety. We encourage ongoing involvement and the empowerment of employees at all levels and foster trust between teams.*

#### 3.1 RESPECTING OTHERS

We believe that full respect for the rights of employees creates a collaborative and trustworthy work environment that is conducive to innovation, a key element of our competitiveness.

We respect the dignity and privacy of each employee. We do not tolerate any form of harassment in the workplace, be it physical, visual or verbal.

#### 3.2 ENCOURAGING OUR TALENTS

By making excellence our central focus, we aim to attract and retain the best talent. We encourage the continuous involvement of employees at all levels of society.

The recruitment and career advancement of our employees is based on their potential, their performance, their behaviour and their willingness to work.

#### 3.3 PROMOTING DIVERSITY

We consider cultural diversity to be one of our greatest assets. We do not tolerate any form of discrimination related to the diversity of origins: gender, religion, political opinion, sexual orientation, social background, age, physical and mental character ...

#### 3.4 ENCOURAGING AN OPEN DIALOGUE

We encourage an open dialogue based on trust with our employees. Our employees are strongly encouraged to communicate openly, and discuss and express any questions or concerns, while their line managers are encouraged to listen and be responsive.

We are determined to protect whistleblowers. No form of retaliation or attempt at retaliation, direct or indirect, against an employee who expresses something in good faith, is tolerated.

#### 3.5 ENSURING HEALTH AND SAFETY IN THE WORKPLACE

The health and safety of our employees is of the utmost importance to us. We are committed to meeting the standards of health, safety and environmental protection in the workplace and in all our activities.

### 3.6 PROTECTING PERSONAL DATA

Sodern collects processes and uses the personal data of its employees and partners to carry out its operational activities. In this context, we are required to comply with all our obligations regarding the collection, processing and use of personal data. We respect and protect the privacy of our employees, customers, suppliers and partners.