

CODE OF ETHICS



At the heart of Sodern lies a tradition of innovation and commitment. We are much more than just an equipment manufacturer; we are a company that is paving the way to the future, bringing down technical barriers to develop cutting-edge solutions in response to the challenges facing the world today.

Our shared vision of contributing to a safe, sustainable future guides us to take up new challenges in strategic sectors, including defence, space and mining.

We firmly believe that diversity of experience and our values of passion, daring, proximity and excellence are sources of inspiration and performance, and the keys to our international outreach.

Our model built around Industry, Conquest and Engagement (I.C.E.) reflects our commitment to shaping a company of the future, a company that remains true to its roots while evolving to meet the major challenges of the 21st century. This is the spirit of Sodern, past and present.

We do not only look to the future; we build it together.

Vincent Dedieu

SODERN CODE OF ETHICS

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1. DOING BUSINESS ETHICALLY

Sodern is committed to the principles of ethical business practice. Our approach is based on respect for our customers and suppliers, and our resolve to be a loyal competitor and an environmentally and socially responsible player.

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. Combating corruption is therefore a critical concern for Sodern.

We do not tolerate any practice that could be considered corruption. We do not offer, attempt to offer, authorise or promise any type of bribe, facilitation payment or kickback to any public official or private body with the aim of winning or retaining a contract or an undue advantage. Similarly, we do not solicit or accept any bribe or kickback from any public official or private organisation.

Furthermore, we never engage the services of a third party to do anything that we cannot ethically or legally do ourselves.

For any need, query or request, our employees are advised to systematically contact our Compliance Officer.

1.2. GIFTS AND HOSPITALITY

Gestures of goodwill, such as gifts and hospitality offered to or received from customers, suppliers and other business partners, must reflect normal business relationships. They may not, on any account, influence or give the impression of influencing a business decision.

Common sense and caution should always be exercised in these situations. For any doubt about whether to offer or accept a particular gift, our employees must seek advice from 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 in which our personal interests interfere, or may appear to interfere, with our ability to fulfil our duties fairly and impartially. Our employees should inform their line manager and the Compliance Officer if a conflict of interest cannot be avoided.

We pay particular attention when hiring employees who are, or have been, public officials or government officers, in accordance with French regulations on the ethics of government employees.

1.4. ANTI-MONEY LAUNDERING

We are committed to complying with all applicable anti-money laundering laws. Consequently, we only do business with reputable customers whose activities are lawful and are carried out with funds which, to the best of our knowledge, are of legal origin.

1.5. FAIR COMPETITION

We believe in fair competition and must operate in strict compliance with competition laws (known as 'anti-competition regulations') applicable in the countries in which we do business. These laws prohibit agreements or conduct that could restrict or distort competition.

We do business accordingly and firmly exclude any agreement, behaviour, exchange or disclosure of commercially sensitive information about competitors, customers or suppliers that could restrict or distort competition or trade

1.6. RESPECT FOR OUR CUSTOMERS

We promise to treat all our customers honestly and fairly, however big or small their company, and to fulfil our contractual commitments.

Our main shareholder guarantees the operational independence of Sodern, demonstrating our strict neutrality with regard to prime contractors in the space industry and providing assurance that our commercial exchanges will remain confidential.

1.7. OUR COMMITMENT TO PRODUCT QUALITY AND SAFETY

We are uncompromising when it comes to the quality and safety of our products. Upholding high product safety standards is in our own best interests, and those of our customers and the aerospace industry in general.

We comply with all quality control regulations and procedures that govern our responsibilities.

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

Sodern is ISO 9001 and EN 9100 certified.

1.8. COMPLIANCE WITH EXPORT CONTROL REGULATIONS

Sodern buys and sells products, equipment, services and information worldwide. Our critical know-how is our main asset and is of strategic interest to our customers, especially the French government, given the dual nature of our activities. We are therefore aware of the need to limit our exposure to the risks involved in our import and export activities. We comply with local, national and international regulations, particularly on embargoes, economic sanctions or other trade restrictions imposed on goods, services, software products or technologies, and with export control procedures. We ensure that we fully comply with regulations in force at all times.

1.9. COMPLIANCE WITH DEFENCE REGULATIONS

Due to our involvement in defence and security, it is vital that we strictly adhere to all applicable rules and regulations.

In particular, we take special care to protect all classified information and all information requiring special levels of clearance.

Our employees are informed of their duty to report to our Security Officer any incident or misuse, whether real or presumed, involving this information, material or data.

Access to, and the exchange and transmission of government-classified information or material require specific administrative authorisations relating to individuals, companies and/or information systems.

Any doubts or questions should be submitted to the Security and Cyber Defence departments for advice. Any incident or any real or presumed misuse of information systems must be reported immediately to the Security and Cyber Defence departments.

1.10. COOPERATING WITH THE AUTHORITIES

We comply with French legislation and cooperate openly with the competent authorities.

When they receive any valid request from a public official concerning an inquiry or a request for information, our employees inform the relevant personnel who then coordinate the response.

At Sodern, we pledge to work closely with public authorities and to keep them continuously informed, including at the local level, to ensure that our activities, particularly our nuclear activities, are always safe for people and the environment.

1.11. TREATING SUPPLIERS AND SUBCONTRACTORS FAIRLY

Our suppliers make a considerable contribution to the value of our products and therefore play a key role in the satisfaction of our customers. We are committed to building fair relationships with our suppliers and subcontractors, and to working with them to achieve mutually beneficial goals. This includes encouraging the sharing of best practices and synergies whenever appropriate.

We ensure that we manage all our supplier relationships in a fair and consistent manner. We have a duty to ensure that any disputes with suppliers are resolved with the utmost professionalism, and that we select our suppliers based solely on the interests of our company.

By pursuing a responsible purchasing strategy, we aim 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 Procurement Policy. Suppliers may be required to demonstrate the application of those principles, including business ethics, anti-corruption measures, human rights, working standards and environmental responsibility.

1.12. MAINTAINING TRUSTING RELATIONS WITH OUR SHAREHOLDERS

We communicate openly with our shareholders, and share information about our activities and objectives in a spirit of transparency, while preserving the confidentiality of our customers' data and our business interactions.

1.13. RESPECT FOR THE ENVIRONMENT (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 pledge to take all necessary measures to fully address these risks. It is vital that we strictly comply with all nuclear safety rules and regulations applicable to our operations.

Our employees are informed of their duty to report any risk or incident to the Radiation Protection Officer.

Beyond these particular risks, environmental concerns are taken into account in all our decisions in order to achieve eco-efficiency.

Therefore, our choices relating to facility management, waste management, manufacturing procedures, and even paper management take the environment into account.

We also comply with all applicable environmental laws and regulations. All our employees undertake to inform their line manager or Health, Safety and Environment Officer of any hazardous situation or accident that could have harmful consequences for the environment.

We strive to reduce our carbon footprint and encourage our partners and suppliers to do the same.

2. PROTECTING ASSETS AND INFORMATION

Everyone has a duty to protect Sodern's tangible and intangible assets and those of our customers and partners. We must ensure that no assets are stolen, damaged, or inappropriately used or destroyed. We must all 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 remaining competitive. Information and know-how are major assets for Sodern and must be protected accordingly.

Sodern expects employees to treat all items entrusted to them in a professional, safe, ethical, legal and productive manner.

Access to confidential information is strictly given on a "need to know" basis and additional restrictions may be introduced if required. Confidential information may only be communicated to colleagues or to officially authorised third parties who request it for legitimate business purposes or when it is required by law.

Employees are encouraged to develop innovative solutions for our products, services and business models. We are all responsible for securing and protecting Sodern's intellectual property at all times.

2.2. KEEPING ACCURATE MANAGEMENT RECORDS

Our customers, shareholders and other stakeholders rely on the precision and accuracy of the information contained in our documents. Therefore, we must all ensure that we provide accurate, up-to-date, complete, correct and understandable information.

When preparing financial documents, Sodern's internal control procedures must be followed and all communication with statutory auditors must be transparent. No one shall create or participate in the creation of documents that may mislead readers or conceal any unlawful activity.

Records must be kept and destroyed in accordance with data retention periods and procedures. For any questions regarding a document retention period or the appropriate method of destruction, employees should contact a manager 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 trustworthy partner, we must treat the information of third parties in compliance with their confidentiality requirements and with all applicable laws and regulations.

Access to government-classified information requires specific authorisations according to its level of sensitivity. Any exchange or transmission of classified information or material must strictly follow the applicable security process. Any incident or real or presumed misuse must be immediately reported to the Security Officer.

2.4. TRADING SHARES

No information likely to influence the price of shares in our shareholding chain may be disclosed until it has been made public.

In accordance with laws governing insider trading, it is not permitted to buy or sell shares of a company about which we hold internal or privileged information. Similarly, no internal or privileged information may be shared with third parties, including colleagues, family members and friends.

2.5. INTERNAL AND EXTERNAL COMMUNICATION

The reputation and notoriety of Sodern are two crucial assets in our conquering strategy.

External communication and raising Sodern's profile among professionals, students, recent graduates or simply enthusiasts who have a connection with our sectors of activity, contribute to achieving this objective.

Social media, the website, press relations and other resources help to raise awareness of Sodern, promote our products in France and abroad, recruit talent and develop a dynamic image on a local scale. As ambassadors for Sodern, our employees are expected to act in accordance with our principles - in particular with regard to information to be protected. Any doubts should be referred to the Communications Department, which is in charge of matters relating to our exposure, including the communication of information on Sodern's official social media accounts.

3. LISTENING TO EMPLOYEES

Respect, honesty and loyalty underpin our working relationships and we are uncompromising in combating any criticism or rumours that run counter to Sodern's value of respect. We encourage employee innovation and

engagement and are committed to maintaining high standards of quality, health and safety. We encourage constant employee involvement and empowerment at all levels and foster trust between teams.

3.1. RESPECTING OTHERS

We believe that fully respecting the rights of employees creates a collaborative and trusting work environment which is conducive to innovation, a key factor of our competitiveness.

New multi-purpose technologies are changing our ways of working. The use of artificial intelligence at Sodern will be guided by our ethical values and, more broadly, by the fundamental principles of respecting human beings and safeguarding individual liberties.

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

3.2. ENCOURAGING OUR TALENT

By placing excellence among our top priorities, we aim to attract and retain the best talent. We encourage constant employee involvement at all levels in the company.

Recruitment and the career advancement of our employees are based on their potential, behaviour, achievements and willingness to work.

3.3. PROMOTING DIVERSITY

We regard cultural diversity as one of our biggest assets. We do not tolerate any form of discrimination on grounds of origin, gender, religious belief, political opinion, sexual orientation, social background, age, or physical and mental characteristics.

3.4. ENCOURAGING OPEN DIALOGUE

We encourage open dialogue with our employees based on trust. Our employees are strongly encouraged to communicate openly, and to discuss and express any questions or concerns. Line managers are encouraged to listen and be responsive. We also encourage all employees to report any situation or behaviour that is contrary to the principles of this Code of Ethics.

Our whistleblowing system enables such situations to be reported while ensuring protection for the whistleblower, the facilitator and the individuals in contact with the whistleblower. Reports can be made via the dedicated platform(<https://ag.1signal.net>), subject to compliance with defence regulations.

We are determined to protect whistleblowers. We do not tolerate any form of direct or indirect retaliation or attempt at retaliation against an employee who reports a situation in good faith.

3.5. GUARANTEEING WORKPLACE HEALTH AND SAFETY

The health and safety of our employees are of the utmost importance to us. We are therefore committed to complying with health, safety and environmental protection standards in the workplace and in all our activities. Employees have a duty to report any hazardous situation or incident to their line manager, to the Health, Safety and Environment Officer or, for specific risks, to the Radiation Protection/Nuclear Safety Officer or the Site Security Officer.

3.6. PROTECTING PERSONAL DATA

Sodern collects, processes and uses the personal data of our employees and partners to carry out its operational activities. In this context, we must 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. The Data Protection Officer (DPO) can be contacted for any queries.