

Sustainability requirements applicable to ArianeGroup GmbH Suppliers, relating to Environment, Social, Governance (ESG) and compliance with regulations

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The current applicable version of this document is the electronic version available at: www.ariane.group. All existing paper version have only an information purpose.

Preamble

The present document is applicable to all Suppliers of Products and services (hereinafter "Supplier") of ArianeGroup GmbH (hereinafter "ArianeGroup") but does not claim to recall all regulatory obligations to which the Supplier must comply with.

In accordance with its commitment to responsible and sustainable growth, this annex aims to present ArianeGroup's requirements regarding sustainability (Environmental, Social and Governance) and provide necessary clarifications on certain regulatory points.

Each Supplier must apply and ensure compliance with its own suppliers and subcontractors with the requirements defined within this document, while considering the specificities of each procurement.

The Supplier must at all times be able to demonstrate compliance to ArianeGroup for current and future deliveries.

When requested for data, the Supplier must provide accurate and complete information about its activities and supplied goods/services to support ArianeGroup's decision-making and ensure compliance. Such information should systematically include the related order/contract reference and any specific references provided by ArianeGroup.

Some requirements in this document require the Supplier's response, which are summarized as follows:

Requirements N°	Requested documents	Method of document transmission
2	Risk control policies (Safety, Environment, Major Risks, Radiation Protection, etc.).	As an Appendix to the Business Proposal or on ArianeGroup request in a frame of a contract or purchase order
3	Safety Data Sheet	arianegroup.FDS@ariane.group
	REACH declaration	reachcontact.de@ariane.group
4	Evidence of Compliance for Radioactive Sources and Products and Devices Containing Radioactive Sources	As an Appendix to the Business Proposal or on ArianeGroup request in a frame of a contract or purchase order
5	Relevant ecodesign information as defined by the ecodesign regulation (if relevant)	dfc-france@ariane.group

REQUIREMENT 1: Sustainable development and reporting

As a responsible company, ArianeGroup is committed to sustainability. Sustainable purchasing objectives, both socially and environmentally, are part of ArianeGroup development policy.

The Supplier must commit to adopt these principles in its strategy and to develop processes and policies that promote corporate social responsibility in its business practices and relations with all stakeholders.

ArianeGroup reserves the right to request additional ESG information as necessary if there is a relevant connection to elements of the contract binding the Supplier and ArianeGroup.

REQUIREMENT 2: Occupational Health & Safety and Environmental Risk Prevention"

Industrial excellence is crucial for the economic and commercial performance of ArianeGroup's suppliers and subcontractors.

Suppliers must ensure health, safety, and well-being of their employees, contractors, visitors, and anyone else affected by their activities, complying with applicable environmental, health, and safety regulations and ArianeGroup's HSE policy.

They are encouraged to implement management systems for Health & Safety and Environment (HSE) to identify, evaluate, and mitigate risks. Suppliers must align their management systems with recognized standards (ISO 14001, ISO 45001).

As part of its commercial proposal, the Supplier must provide ArianeGroup as an Appendix to the Business Proposal or on ArianeGroup request in a frame of a contract or purchase order its risk management policies (Safety, Environment, Major Risks, Radiation Protection, etc.). Pollution prevention should be among the Supplier's objectives.

REQUIREMENT 3: Regulation relating substances on their own, in mixture, or incorporated in articles¹

In order to satisfy their compliance and to anticipate prohibitions or restrictions on the placing on the market or use of substances on their own or in mixture, suppliers of items (named « articles ») and of chemical products must have at all times an up-to-date knowledge of the relevant National and European related regulations, the main texts of which (Cf. note 1&2) are recalled here after:

- Classification, Labelling and Packaging of chemicals (CLP Regulation (EC) n°1272/2008)
- Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH Regulation (EC) n°1907/2006)
- Restriction of Hazardous Substances in electrical and electronic equipment (RoHS Directive n°2011/65)
- Persistent Organic Pollutants (POPs Regulation (UE) 2019/1021)
- Fluorinated greenhouse gases (F-Gas Regulation (UE) n° 2024/573)

¹ REACH defines an article as an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition ([guidance available on ECHA website](#))

- Import and export of hazardous chemicals (PIC Regulation (UE) n°649/2012)
- Ozone depleting substances (ODS Regulation (UE) n°2024/590)
- Biocidal Products (BPR Regulation (UE) n°528/2012)
- Marketing and use of explosives precursors (Regulation (UE) n°2019/1148) and monitoring of trade in drug precursors between the European Union and third countries (Regulation (CE) n°111/2005)
- Monitoring of trade in drug precursors within the European Union (Regulation (UE) n° 273/2004)
- Measures against the harmful effects of waste generation and management (Directive (CE) n°2008/98)
- Nanomaterials (articles R523-12 to D523-22 Code de l'Environnement)

Note 1: texts are likely to be updated and revised, it is important for everyone to ensure that they have the latest version in force.

Note 2: non-exhaustive list.

Clarification of exemptions and derogation provided by the texts

In the event of a legal rule allowing an exemption or derogation in the context of space or defence activities, the Supplier under contract for ArianeGroup must obtain prior written authorisation from ArianeGroup before requesting such exemption or derogation from the competent national authorities. Once granted, the Supplier must inform ArianeGroup as soon as possible.

The supplier will provide ArianeGroup, at its request, with all the elements to justify the validity of such an exemption or derogation

Due to the multiplicity of its sectors of intervention, ArianeGroup does not intend, except on a very exceptional basis, to implement the defence exemption provided for in the REACH Regulation.

Although the RoHS Directive does not apply to the Defence and Space sectors, the Supplier under contract with ArianeGroup must not take into account this exclusion or any possibility of invoking this exemption.

Clarification of regulatory evolution, or design modification by the Supplier of article², substance, or mixture

The Supplier shall immediately communicate to ArianeGroup data concerning the identification of new environmental or health risks, or hazards related to substances or mixtures incorporated in articles² and/or used in the course of services provided to ArianeGroup, or an aggravation of known risks and hazards affecting ArianeGroup, taking into account its uses of such substances, mixtures or articles.

Any change in the chemical composition of the mixtures or articles to be delivered, or any regulatory update modifying their status (in case of impact on their activities), must be notified by the Supplier to ArianeGroup as soon as such a change is known.

Assuming the modification of products and/or production processes, changes are only possible if ArianeGroup has received prior notification from the Supplier with a quality assurance/qualification report and has formally accepted it.

² REACH defines an article as an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition ([guidance available on ECHA website](#))

Clarification on the Safety Data Sheets

The Safety Data Sheets for substances and mixtures, as provided for in article 31 of the REACH Regulation, must be sent directly to the following address:



arianegroup.FDS@ariane.group

Clarification REACH Declaration

Article 33 of the REACH Regulation describes the obligation for Suppliers of article³ to provide information on the presence of substances of high concern « SVHC⁴ ». These SVHC are in the Candidate List, which is usually updated twice a year (cf. ECHA website⁵).

In accordance with this regulation, if one of the articles provided to ArianeGroup contains one or more SVHC above the concentration threshold of 0.1% by weight⁶ (on the sub-article on which it is located), the Supplier is required to provide this information by means of a REACH declaration on the basis of the last Candidate List in force on the date of delivery.

In case no SVHCs need to be declared, and in order to confirm that this check was carried out, ArianeGroup invites the Supplier to provide with a REACH declaration stating the absence of such substances.

Note that this declaration is based on the received information within the REACH declarations provided by the suppliers of articles and from the information contained in the Safety Data Sheets of the chemical products incorporated during the manufacture of the article delivered to ArianeGroup.

In order to allow the safe use of the article, and for ArianeGroup to be able to write the REACH declarations towards our customers, this declaration must contain at least:

- the designation of the article and its ArianeGroup reference,
- the date of the last Candidate List in force on the date of its writing (and therefore close to the delivery date),
- the name of the SVHC contained in the article (with their CAS or EC number),
- for each SVHC declared: the sub-article on which it is present above the threshold of 0,1%,
- if necessary, adequate data and instructions to ensure safe use of the delivered article

It must be provided in the documentation of the delivery review, or directly to the purchaser, or if applicable to the REACH contact at the following address:



reachcontact.de@ariane.group

Clarification on REACH Authorisation

The Supplier of articles must immediately inform concerning the request, grant or refusal of a REACH authorisation for a substance on Annex XIV of the REACH Regulation, used as such or incorporated in mixtures or articles and/or used in connection with services delivered or to be delivered to ArianeGroup.

³REACH defines an article as an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition ([guidance available on ECHA website](#))

⁴ Substance of Very High Concern

⁵ <https://echa.europa.eu/en/candidate-list-table>

⁶ The judgement of the European Court of Justice of 2015 clarifies that the threshold of 0,1% apply to each article incorporated as a component of the complex article rather than to the article as a whole

REQUIREMENT 4: Ionizing radiation

The Supplier must provide evidence in annex to their commercial proposal or on ArianeGroup request in a frame of a contract or purchase order, that they comply with national legislation implementing Directive 2013/59/Euratom of the Council of December 5, 2013, establishing basic safety standards against the dangers arising from exposure to ionizing radiation, for radioactive sources and products containing them.

In particular, the Supplier must demonstrate that provided sources and devices comply with applicable requirements concerning authorisation, labelling, and traceability as defined by the national regulations in force in the country where the supplier is established.

Furthermore, the Supplier of sealed radioactive sources, products or devices containing them, is obliged to retrieve any sealed source it has distributed upon ArianeGroup simple request, when such source has expired or ArianeGroup no longer requires its use, in accordance with applicable take-back obligations under said directive's national implementing regulations.

REQUIREMENT 5: Eco-efficient design and production

ArianeGroup aims to integrate eco-design into its projects and endeavors to improve the collection of environmental data from its supplies to incorporate it into its environmental impact assessments.

In accordance with Regulation EU 2024/1781 establishing a framework for setting requirements for eco-design of sustainable products, suppliers must provide ArianeGroup with relevant eco-design information as defined by the regulation (refer to Article 7).



dfc-france@ariane.group

REQUIREMENT 6: Conflict minerals and rare earths

The Supplier commits to implementing appropriate measures within its supply chain to ensure that tin, tantalum, tungsten, their ores, and gold do not originate from conflict or high-risk areas (as defined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas).

The Supplier commits to informing ArianeGroup if using rare earths that could lead to disruption in product or service delivery.

REQUIREMENT 7: Climate trajectory and greenhouse gas assessment

ArianeGroup is actively engaged in continuous improvement of its climate impact and vulnerability, aligning with its sustainability goals and environmental performance objectives.

The Supplier must take into account the Climate appendix which mentions specific requests dealing with certain services and products.

CHANGE RECORD

ISSUE	DATE	CHANGE
Version 1	1 st July 2016	New
Version 2	1 st July 2017	Modification of the company name + wording change
Version 3	4 th June 2026	Addition of a summary table of data to transmit. Change of the existing requirements and additions related to conflict minerals, rare earths and climate. Mention of the climate appendix. Clarification on the obligation to provide REACH declarations. Communication of the new address email to provide Safety Data Sheets, and ecodesign data.