

## SUPPLIER CODE OF CONDUCT

For ArianeGroup, Corporate Social Responsibility is key to long-term success. We are thus committed to promoting core values which respect human rights, labor rights standards, as well as environmental and anti-corruption practices, both within our organization and everywhere we develop our activities or have potential impacts.

These values and practices are in line with international recognized standards as laid out in charters, declarations and guidelines as well as the commitments taken by ArianeGroup in its Code of Conduct.

ArianeGroup is determined to ensure the highest standards of responsibility and integrity throughout its supply base. Therefore, we request that suppliers and subcontractors commit to the ArianeGroup Code of Conduct and cascade these values and principles throughout their own supply chain.

The provisions herewith set out are to be acknowledged and observed by all suppliers and subcontractors of ArianeGroup' owned and controlled companies (hereafter designated by "the Supplier").

The Supplier undertakes to respect and implement the here below ethics values and compliance principles, and acknowledges that it will be liable to ArianeGroup for all damages that could occur due to its lack of compliance with these obligations.

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Document from the ArianeGroup CMS information system. Check for the latest applicable issue

## 1. SIMPLICITY

The Supplier conducts business responsibly and simply commits to complying with all applicable laws and regulations in every country in which it does business.

### 1.1. Respecting employee's rights

The Supplier respects universal and inalienable human rights and fundamental employment rights as set in the Universal Declaration of Human Rights.

The Supplier respects all labor legislation applicable in the countries where it does business, along with the standards of the International Labor Organization (ILO) Convention.

The Supplier respects personal dignity and privacy, and the rights of the individual. The Supplier does not tolerate any form of child labor, forced or compulsory labor or harassment. It ensures that all agreements on working hours are respected, with employees receiving an appropriate salary and benefit for their work.

### 1.2. Ensuring workplace health and safety

The Supplier provides a safe and healthy working environment for all employees. It maintains the highest standards of physical, mental and social well-being for its workers through relevant prevention, training and communication, and fosters improvements through worker health and safety committees. The Supplier respects applicable health and safety laws and develops an occupational health, safety and risks prevention policy in the workplace.

### 1.3. Zero tolerance of corruption

Offering, giving, soliciting and receiving inducements, such as money, goods or services, with the intention of influencing a person, a corporation or a public official, is strictly prohibited.

The Supplier is committed to respect values of honesty and integrity. It does not tolerate any form of corruption, bribery, extortion, or embezzlement. The Supplier prevents corruption and abides with:

- The OECD Convention on combating the bribery of foreign public officials in international business transactions;
- The OECD Guidelines for Multinational Companies (if relevant);
- The First Protocol to the Convention on the Protection of the European Communities' Financial Interests and the Convention on the Fight against Corruption Involving Officials of the European Communities (EC) or Officials of Member States of the European Union as implemented by the EU Member States.

The Supplier exerts reasonable due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants.

### 1.4. Gifts and business courtesy

The Supplier strictly refrains from offering, promising or granting any gift (including non-monetary gifts, invitations, services or any other advantage) to ArianeGroup employees with the aim to influence the business relation, or as long as it could be considered as an attempt to exert such influence.

Granting any gift of money or equivalent (voucher, gift-card) or any trip to an ArianeGroup employee is prohibited. Other types of gifts may be accepted as long as their value does not exceed fifty euros (€50), or one hundred euros (€100) for invitations.

### 1.5. Avoiding conflicts of interest

The Supplier avoids all conflicts of interest or situations giving the appearance of a potential conflict of interest, including in its dealings with ArianeGroup. The Supplier shall provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of ArianeGroup and personal interests or those of close relatives, friends or associates.

### 1.6. Competing fairly

The Supplier adheres to existing laws that regulate competition, in particular to anti-trust laws. It does not fix prices or rig bids with competitors.

### 1.7. Complying with import and export laws

The Supplier ensures compliance with all applicable laws, directives and regulations governing the import and export of parts, components and technical data that may limit business with certain countries, corporations or persons. The Supplier provides truthful and accurate information and obtains export licenses where necessary.

### 1.8. Complying with Defense regulations

The Supplier ensures compliance with all applicable internal and external security rules and regulations.

Any exchange or transmission of classified information or material strictly complies with the relevant security process.

## 2. COLLABORATION

The Supplier promotes a culture of mutual respect in the way it does business, putting the collective interest first.

### 2.1. Offering equal opportunities

The Supplier supports diversity and offers equal opportunities for all employees. The Supplier condemns any form of discrimination against such things as ethnicity, gender, color, religion, political opinion, nationality, age, disability, sexual orientation, social origin, trade union affiliation and marital or family status.

### 2.2. Encouraging open dialogue

The Supplier develops a continuous, open and transparent social dialogue with employees and employees' representatives, in particular through appropriate collective bargaining structures.

The Supplier provides its employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. The Supplier takes action to prevent, detect, and correct any retaliatory actions.

### 2.3. Ensuring fair relationships with shareholders

The Supplier maintains an open dialogue with its shareholders and, in the spirit of transparency, exchanges information on its activities and objectives—without prejudice to other applicable provisions.

### 3. TRUST

Transparency and honesty guide the Supplier in its business activities and help it create a trustful work environment for all stakeholders. The Supplier has a duty to protect its client's assets, both tangible and intangible.

#### 3.1. Protecting privacy and personal data

The Supplier complies with obligations resulting from the European regulations in force, in particular with the European Union (EU) Directive 95/46/EC and the EU General Data Protection Regulation, and, as applicable, with any local laws and regulations concerning how individual personal data is collected, processed and used. The Supplier always respects and protects the privacy of its employees, customers, suppliers and business partners.

The Supplier takes all precautions, technical and organizational measures to preserve the confidentiality and security of ArianeGroup employees' personal data, and in particular to prevent them from being distorted, damaged or communicated to unauthorized third parties. The Supplier does not cause any cross-border transfer of ArianeGroup employees' personal data from a EU country to a country located outside the EU, unless authorized by ArianeGroup and according to the conditions defined by ArianeGroup.

#### 3.2. Protecting assets and information

The Supplier exercises care and diligence to ensure that all applicable security and information systems security requirements are met and that key assets, whether tangible or intangible, are protected. In particular, information is managed and hosted with the appropriate level of security.

Information should not be used for any purpose other than the business purpose for which it was provided and should be handled in accordance with the terms of its disclosure.

#### 3.3. Respecting property rights

The Supplier promotes the respect of both physical and intellectual property rights. The Supplier does not infringe the intellectual property rights of third parties, such as patents, trade secrets, trademarks, copyrights and other proprietary information.

#### 3.4. Maintaining accurate records

The Supplier creates accurate records and does not alter any record entry to conceal or misrepresent the underlying transaction. All records, regardless of format, made or received as evidence of a business transaction, fully and accurately represent the transaction or event being documented. Records are retained based on the applicable retention requirements.

#### 3.5. Insider trading

The Supplier and its personnel never use non-publicly disclosed information obtained in the course of their business relationship with ArianeGroup as the basis for trading or for enabling others to trade in the securities of any company.

#### 3.6. Ruling out fraud and deception

The Supplier does not knowingly seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, nor allows anyone else to do so.

## 4. CUSTOMER ORIENTATION

The Supplier has its customers' interests at heart and, with the help of its partners, suppliers and subcontractors, is fully dedicated to delivering the best products and services.

### 4.1. Respecting customers

The Supplier is committed to dealing honestly and fairly with all customers, whatever the size of their business, and to honor its contractual commitments.

### 4.2. Commitment to product and service quality and customer satisfaction

The Supplier delivers products and services that meet customer requirements for high quality, cost and time effectiveness, and innovative technology with a continuous improvement mindset.

### 4.3. Excluding counterfeit parts

The Supplier develops, implements and maintains methods and processes appropriate to its products to eliminate the risk of introducing counterfeit parts and materials into deliverable products. Effective processes are also in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit products, and exclude them from the deliverable products.

### 4.4. Ensuring mutually beneficial relationships with suppliers and subcontractors

The Supplier is committed to sustaining fair relationships with its own suppliers and subcontractors. The Supplier secures relationships with its suppliers to achieve goals of mutual benefit. The Supplier promotes the exchange of best practices and share synergies where relevant.

## 5. CONQUEST

Ethics and Corporate Social Responsibility are key elements of business excellence and represent a new frontier for all companies. The Supplier is committed to integrate these principles in its strategy in order to foster sustainable growth.

### 5.1. Supporting personal development and training

The Supplier develops the skills and know-how of their employees, both for their individual benefit and for collective success.

### 5.2. Supporting community development

The Supplier promotes local initiatives for fair community development, to benefit the areas in physical proximity to its sites or areas of impact. Where possible, it also contributes to the economic, social and educational well-being of local communities.

### 5.3. Respecting the environment

In addition to complying with environmental laws and regulations, the Supplier manages environmental risks and minimizes the environmental impact of its activities, products and services. This includes the prevention of pollution and the efficient use of resources. To continuously improve environmental protection, the Supplier considers international standards and the associated relevant methodologies.

#### 5.4. Conducting responsible sourcing: conflict minerals

The Supplier commits to implementing all appropriate measures in its supply chain in order to guarantee that tin, tantalum and tungsten, their ores, and gold do not come from conflict-affected and high-risk areas (as defined by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas). The Supplier also commits to providing ArianeGroup with all related supply chain information upon request.

#### 5.5. Establishing Ethical business standards globally

Commensurate with the size and nature of its business, the Supplier has management systems in place to maintain effective governance and support compliance with laws, regulations, and the expectations related to or addressed expressly within this Supplier Code of Conduct.

Upon request from ArianeGroup, the Supplier shall demonstrate the means implemented in order to ensure adherence to the Supplier Code of Conduct.

The Supplier maintains effective programs to encourage its employees to make ethical, values-driven choices in their business dealings—beyond compliance with laws, regulations and contract requirements.

The Supplier acknowledges that reaching the standards established in this Code is a dynamic process and commits to continuously improving its operations.

The Supplier ensures that the sourcing provisions defined herein are also observed by all its subcontractors and suppliers. ArianeGroup relies on the Supplier to communicate and actively promote this Supplier Code of Conduct throughout its entire supply chain. ArianeGroup also encourages the Supplier to implement its own written code of conduct.

### Consequences for violating the Code of Conduct

Compliance with this Supplier Code of Conduct is a determining condition for ArianeGroup to contract with the Supplier.

Should the Supplier notice or suspect any breach of regulations, laws or the Supplier Code of Conduct, the Supplier should immediately notify the ArianeGroup contact person as well as the Ethics & Compliance department at [alert-ethicscompliance@ariane.group](mailto:alert-ethicscompliance@ariane.group)

In case of such non-compliance, the Supplier shall, following a written notice from ArianeGroup, implement the appropriate measures to restore compliance. ArianeGroup and the Supplier shall agree on an appropriate time frame for said implementation which shall not exceed sixty (60) days following reception of the notice from ArianeGroup.

If the Supplier does not succeed to achieve compliance with ArianeGroup Supplier Code of Conduct Provisions within the agreed time frame, ArianeGroup reserves the right to take all appropriate and reasonable measures.

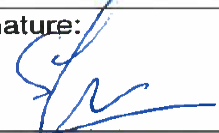

Contact: Ethics & Compliance department – [alert-ethicscompliance@ariane.group](mailto:alert-ethicscompliance@ariane.group)

## 6. HISTORY OF CHANGES

A **yellow** highlighting in the text indicates an update with regard to the previous issue. In case of necessity (    ) indicates deleted information.

Issue	Approval date (DD/MM/YYYY)	Author	Affected section	Description of change
01	21/02/2017	Sylvie Migdal	All	Initial Release

## 7. SIGNATURES

AUTHOR	Role: Head of compliance	Name: Sylvie Migdal	Signature: 
APPROVER	Role: CEO	Name: Alain Charmeau	Signature: 

### MEANING OF A SIGNATURE:

- **"Author"**: the person certifies that the content of the document has been created by the appropriate organization or persons, through the relevant processes and with a check of conformity with the rules and guidelines for writing CMS documentation; this includes the required agreement with other contributors / authors.
- **" Approver "**: the person is committed to, or endorses, application of this document or identifies it as expression of the Company's position / policy; this must be validated thanks to a final review with all the main responsible persons directly involved; this also testifies that the compliance to formal requirements and standards has been checked; the relevant Process Specialist in the CMS team can bring a support to this end.