CODE OF CONDUCT
Ambition and a determination for conquest – these are the driving forces behind the creation of ArianeGroup. Our goal is to become the world reference of the industry for space access. In this extremely competitive context – as for our defense sector activities – our brand identity and our reputation are among our most precious assets.

The notions of Ethics and Compliance are embedded in our strategy for achieving industrial and commercial excellence at the widest level, and are key factors for our future success.

But company processes alone are not enough. If we want ArianeGroup to be a socially responsible corporate citizen, it is incumbent on each and every one of us individually to ensure that our daily activities and behavior are true to our Code of Conduct, and that our corporate culture is naturally rooted in the highest ethical standards.

As we have set off together on this ambitious adventure, I want to thank you all now for your on-going contribution to making ArianeGroup a company of which we can all be proud.

Alain Charmeau
At ArianeGroup, we conduct our business with integrity and pursue the highest standards of Ethics and Corporate Social Responsibility. These are embedded in each and every one of ArianeGroup’s ways of working: collaboration, trust, customer orientation, conquest and simplicity.

This Code of Conduct aims at providing guidance in key areas in order to help us operate in accordance with our company’s values. It applies to all ArianeGroup employees and entities over which ArianeGroup has full or joint control.

This Code of Conduct cannot address every challenging situation that may arise. When in doubt, each of us has a responsibility to seek advice. In addition, we should disclose any situation that may violate laws or internal policies and standards and report any concerns to the Ethics & Compliance department (alert-ethicscompliance@ariane.group). Depending on the topic, members of the Human Resources or Legal departments may also be contacted.

Each and every one of us shares a collective responsibility to respect, promote and comply with the standards given in the Code of Conduct. We also recognize our responsibility to uphold these standards across the extended enterprise with all ArianeGroup stakeholders.
1. **COLLABORATION**
   
   1.1. Respecting people
   1.2. Encouraging open dialogue
   1.3. Ensuring fair relationships with shareholders
   1.4. Cooperating with authorities

2. **TRUST**
   
   2.1. Protecting privacy and personal data
   2.2. Protecting our assets
   2.3. Communicating and protecting our image
   2.4. Protecting third-party information
   2.5. Maintaining accurate records
   2.6. Trading Securities

3. **CUSTOMER ORIENTATION**
   
   3.1. Respecting our customers
   3.2. Commitment to Product Safety and Quality
   3.3. Ensuring Mutually Beneficial Relationships with Suppliers and Subcontractors

4. **CONQUEST**
   
   4.1. Fostering our talent
   4.2. Promoting diversity
   4.3. Establishing ethical business standards globally
   4.4. Supporting our local communities
   4.5. Striving for eco-efficiency

5. **SIMPLICITY**
   
   5.1. Ensuring workplace health and safety
   5.2. Zero tolerance of corruption
   5.3. Gifts and hospitality
   5.4. Identifying and managing conflicts of interest
   5.5. Competing fairly
   5.6. Complying with import and export laws
   5.7. Complying with defense regulations
1. COLLABORATION

We promote a culture of mutual respect in the way we do business, putting the collective interest first.

1.1. Respecting people

We recognize that fully respecting employees’ rights creates a trustful and collaborative workplace that also increases innovation, a key to our competitiveness.

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

While fostering individuality contributes to rich cultural diversity, our high performance culture requires common values and behaviors that govern our interaction with each other and with stakeholders. This is encouraged by our Leadership Model.

1.2. Encouraging open dialogue

We promote an open and trust-based dialogue with employees at all levels of ArianeGroup and their representatives. Employees are strongly encouraged to openly communicate, discuss and clarify their questions or concerns, and management is encouraged to listen and be responsive.

We are committed to protecting whistle-blowers and will not tolerate any direct or indirect retaliation, or attempted retaliation, against an employee who speaks up in good faith.

1.3. Ensuring fair relationships with shareholders

We maintain an open dialogue with our shareholders, and exchange, in the spirit of transparency, information on our activities and objectives.

1.4. Cooperating with authorities

We cooperate with legitimate authorities. Any request from a public official that relates to an investigation or inquiry must be coordinated with the General Secretary.
2. TRUST

Transparency and honesty guide us in our business activities and help us create a trustful work environment for all stakeholders.

We each have a duty to protect ArianeGroup’ as well as third-parties’ assets, both tangible and intangible.

2.1. Protecting privacy and personal data

While we may collect, process and use employees’ and business partners’ personal data to fulfill ArianeGroup’ operational activities, we must also comply with all applicable obligations concerning how individual personal data is collected, processed and used. We always respect and protect the privacy of employees, customers, suppliers and business partners.

2.2. Protecting our assets

Protecting our people, our property, our information, our competencies and our know-how is key in order to build trust and maintain our competitiveness.

We treat all property entrusted to us in a professional manner and in support of ArianeGroup´ business goals. We use it in a safe, ethical, lawful and productive manner.

We treat company information and know-how as key assets of ArianeGroup and protect them accordingly. Access to confidential information is strictly on a need-to-know basis. It can only be disclosed to formally authorized co-workers or outside parties who need this information for legitimate business purposes, or if required by law.

We are encouraged to develop innovative solutions for products, services and business models. We must always ensure that we secure and protect ArianeGroup’ intellectual property and avoid knowingly infringing upon the intellectual property rights of others.

2.3. Communicating and protecting our image

ArianeGroup’ reputation is a very important asset. It is therefore crucial that we promote and protect our image. In addition, we must provide accurate and truthful information to the public regarding our business.

Only designated persons may respond to formal outside requests for information, especially by the media. We must not in any case provide information or engage in social media activities on behalf of ArianeGroup.

ArianeGroup sponsorships shall be in line with our strategic focus and our ethical standards and must always be transparent and accurately recorded in books and records.
2.4. Protecting third-party information

Our customers, suppliers and other partners often entrust us with their own confidential and proprietary information. To be a trustworthy partner, we must handle third-party proprietary information in accordance with the terms of its disclosure and in strict compliance with all applicable laws and regulations.

2.5. Maintaining accurate records

Our stakeholders as well as government regulators rely on the accuracy and correctness of the information contained within our business records. We therefore have a responsibility to ensure that the information we provide is accurate, timely, complete, fair and understandable.

In maintaining our financial records, we must follow the internal control procedures set out by ArianeGroup. We may not create or participate in the creation of records that mislead anyone or conceal any improper activity.

We are expected to maintain and destroy ArianeGroup documents in accordance with the records retention schedules and procedures.

2.6. Trading Securities

We may not disclose any information that could influence the value of ArianeGroup’s shareholders’ stock price until it has been communicated to the public.

In line with insider trading laws, we may not buy or sell the stock of any company while in possession of inside or privileged information about that company. In addition, we may not disclose any inside or privileged information to anyone, including co-workers, family and friends.
3. CUSTOMER ORIENTATION

We have our customers’ interests at heart, and, with the help of our partners, suppliers and subcontractors, are fully dedicated to delivering the best products and services.

3.1. Respecting our customers

We are committed to dealing honestly and fairly with all our customers, whatever the size of their business, and to honor our contractual commitments.

3.2. Commitment to Product Safety and Quality

We should never sacrifice product safety or quality. Maintaining high standards of product safety is in our interest as well as the interest of our customers and the global aerospace industry.

We must comply with all quality control standards and procedures that govern our responsibilities. Product quality and safety depend heavily on information feedback. We are thus expected to alert in full transparency when anomalies or deviations to our processes are observed, to stop and fix any quality and safety issue, and then to propose the adequate prevention and improvement actions.

3.3. Ensuring Mutually Beneficial Relationships with Suppliers and Subcontractors

Suppliers deliver a high proportion of the value of ArianeGroup’ products, and thus play an important role in customer satisfaction. We are committed to sustaining fair relationships with suppliers and subcontractors and to securing relationships with our suppliers to achieve goals of mutual benefit. This means promoting the exchange of best practices and share synergies where relevant.

The Procurement function is responsible for ensuring that all supplier relationships are handled in an equitable and compliant manner. We each have a duty to make certain that issues with suppliers are professionally dealt with at all times, and that our selection of suppliers is based solely on what is best for the company.
4. CONQUEST

Ethics and Corporate Social Responsibility are key elements of business excellence and represent a new frontier for all companies. We are committed to integrating these principles in our strategy in order to foster sustainable growth and make of ArianeGroup an increasingly attractive workplace.

4.1. Fostering our talent

In keeping with our focus on excellence, we aim to attract and retain leading-edge talent. We foster the continued engagement of employees at all levels, throughout the organization.

We recruit and select individuals for career advancement on the basis of their potential, their performance, their behavior, and their willingness to work in different functions and entities.

4.2. Promoting diversity

We consider cultural diversity as one of our greatest strengths. We support diversity in ethnicity, gender, religion, national origin, political opinion, sexual orientation, social origins, age and physical or mental character. We do not tolerate any form of discrimination.

4.3. Establishing ethical business standards globally

We commit to developing processes and policies that foster Ethics & Compliance in our corporate business practices. We recognize that reaching the standards established in this Code is a dynamic process and we commit to continuously improving our operations.

We also promote the adoption of Ethics & Compliance standards in the extended enterprise, namely by doing business only with suppliers who understand, share and adhere to our business ethics standards and respect our Supplier Code of Conduct.

4.4. Supporting our local communities

We are committed to improving the quality of life in the communities where we live and work. Corporate donations to public-interest or private organizations may be permitted if not limited or forbidden by local law or internal Ethics & Compliance standards.

4.5. Striving for eco-efficiency

We acknowledge that we have a responsibility to our global community to protect the environment.

We therefore aspire to become an eco-efficient enterprise. We must promote eco-efficiency in all of our business activities by striving to reduce the overall ArianeGroup – and global – environmental footprint. In addition, we must comply with and strive to exceed all applicable environmental laws and regulations wherever we do business.
5. SIMPLICITY

We conduct our business in a responsible way, respecting applicable laws and regulations in all the countries where we do business as well as internal rules and procedures. Since we operate in a complex regulatory environment, most applicable laws and regulations have been transposed into internal operational procedures. As employees, we simply have to respect internal rules, procedures and best practices in order to be compliant with company policy as well as the law.

5.1. Ensuring workplace health and safety

Employees’ health and safety is of utmost importance for us. We are therefore committed to pursuing the highest health, safety and environmental standards in the workplace and in all our activities.

5.2. Zero tolerance of corruption

Reputation is one of our most precious assets, and could be forever damaged by the misconduct of a single employee or third party. Hence, the fight against corruption is utterly critical for us.

We may never engage in any kind of corrupt practice. We may never offer, attempt to offer, authorize or promise any sort of bribe, facilitation payment or kickback to a public official or private body for the purpose of obtaining or retaining business or an improper advantage. Likewise, we must never solicit or accept a bribe or kickback from a public official or private body.

In addition, we may never hire someone else to do anything that we cannot ethically or legally do ourselves.

Finally, we should always seek guidance from the Ethics & Compliance department.

5.3. Gifts and hospitality

Business courtesies, such as gifts and hospitality, given to or received from customers, suppliers and other business partners, must reflect a normal courtesy of business and may not influence, or give the appearance of influencing, any business decision.

Good judgment and prudence should always guide us in these situations.

In the interest of full transparency and to facilitate possible audits or reviews, records of gifts or hospitality must be maintained according to the Prevention of Corruption and Fraud policy.
5.4. Identifying and managing conflicts of interest

As part of our efforts to protect ArianeGroup’s reputation and ensure we are acting on the basis of what is best for our company, we do our best to avoid situations where our personal interests interfere, or appear to interfere, with our ability to perform our jobs without bias. If we cannot avoid a conflict of interest, we make it known to our manager and to the Ethics & Compliance department.

In particular, we exercise utmost vigilance when hiring current and former public officials or government employees.

5.5. Competing fairly

We believe in fair competition and behave accordingly, strictly excluding all agreements, behaviors or exchange or disclosure of commercially sensitive information relating to competitors, customers or suppliers, that may restrain or alter competition or trade.

5.6. Complying with import and export laws

ArianeGroup purchases and sells goods, services and information throughout the world. In order to reduce the risk exposure linked to our import and export activities, it is thus critical that we carefully respect Export Control processes in order to comply with all applicable regulations.

The Export Control organization is available to answer all of your questions.

5.7. Complying with defense regulations

The nature of our core business makes it all the more crucial for us to strictly comply with all applicable internal and external security rules and regulations.

Access to government-classified information requires specific clearances. Any exchange or transmission of classified information or material must comply strictly with the relevant security process. Any actual or suspected incident or misuse must be immediately reported to the Security & Cyberdefense department.