



arianeGROUP



## STATEMENT OF PRINCIPLES ON HUMAN RIGHTS AND THE ENVIRONMENT

ArianeGroup Holding is a joint venture between Airbus and Safran with three core businesses: Space Transportation, Defence, Equipment & Services.

ArianeGroup designs and creates innovative and competitive launch systems, offering civil and military space solutions for institutional, commercial and industrial customers. ArianeGroup's mission is *"to pioneer the European way to space for the well-being of all citizens in a safe world"*.

In this Statement of Principles on Human Rights and the Environment ("Statement"), the term "ArianeGroup" refers to ArianeGroup Holding SAS (top holding entity) and its first-level subsidiaries, ArianeGroup SAS and ArianeGroup GmbH.

## PURPOSE AND SCOPE OF THIS STATEMENT

This Statement describes the measures ArianeGroup has put in place to identify risks and prevent impacts on human rights, fundamental freedoms, health, safety and the environment resulting from ArianeGroup's activities, including its relations with subcontractors and suppliers.

It details the principles deriving from the ArianeGroup's Commitment to Protecting Human Rights and the Environment signed by ArianeGroup's Chief Executive Officer.

This document forms an integral part of ArianeGroup's Duty of Vigilance (as per the French Commercial Code) and responds to the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz) of 16 July 2021 (the "Act").

It covers the following entity in the scope of the Act: ArianeGroup GmbH.

# OUR GOVERNANCE

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ArianeGroup is committed to sustainability. At the heart of its concerns is being a responsible corporate citizen and ensuring that access to space remains a means for supporting a sustainable Earth.

ArianeGroup's sustainability commitments, supplemented by its Commitment to Protecting Human Rights and the Environment endorsed at the highest level of the company by the Chief Executive Officer, encompass protection of the environment and human rights.

ArianeGroup's Executive Committee has adopted and oversees a Sustainability Roadmap, and performs an annual review of ArianeGroup's sustainability priorities.

The General Secretary of ArianeGroup is responsible for piloting the implementation of ArianeGroup's sustainability commitments. Within the General Secretary directorate, the Sustainability and Corporate Support team is responsible for coordinating these topics at group level and reports every two months to the Sustainability Steering Committee, which is the key decision-making body on sustainability topics for ArianeGroup including subsidiaries. This committee is composed of the Chief Executive Officer, the Chief Technical Officer, the Chief Human Resources Officer, the General Secretary, the Chief Strategy and Innovation Officer, the Chief Communication Officer and the Head of the CEO Office.

ArianeGroup has formed transversal teams within all functions concerned in order to elaborate and implement a harmonised and comprehensive sustainable management strategy. These various teams and functions also monitor and report compliance with all key issues contained in this Statement within their own area of responsibility and in collaboration with one another via dedicated networks or as part of their daily operations.

In order to foster such collaboration between different functions, and to secure the implementation of the principles contained herein within ArianeGroup and its supply chain, ArianeGroup has appointed a Human Rights Officer within ArianeGroup. The Human Rights Officer reports directly to the managing directors of ArianeGroup GmbH as the legal entity in scope of the Act. In addition, the Human Rights Officer reports functionally to the General Secretary. The managing directors of ArianeGroup GmbH report on the action plan to the supervisory board of ArianeGroup GmbH regularly at least once per year and ad hoc as often as necessary.

The Human Rights Officer's tasks include the setting up of preventative measures, the implementation of risk analyses and remedial actions, the processing of complaints and reporting to the management and the competent authorities. In this respect, the Human Rights Officer coordinates the activities of the functions concerned and guides their work into a harmonised and comprehensive strategy for ArianeGroup to reduce human rights and environmental risks in its entire value chain.

# RISK MANAGEMENT AND RISK ANALYSIS

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Every year, ArianeGroup establishes a comprehensive risk map covering all its activities and including human rights- and environment-related risks. The Enterprise Risk Management ("ERM") and Internal Control department supervises this risk mapping and risk management.

The methodology for identifying, assessing and prioritising risks is set out in a Group-level procedure. It is based on three pillars: anticipation, operational control and employee commitment.

Each identified risk is listed according to its probability of occurrence and its impact on ArianeGroup's personnel, sales, finance, reputation and know-how. Once the criticality of each risk has been assessed, actions are determined to reduce its probability and/or impact. Risk maps and reduction strategies are presented twice a year to the Executive Committee in order to reassess risks concerning ArianeGroup's activities, and to check the progress status of actions and the effectiveness of those implemented.

The main risks for natural resources and the environment are those which concern health and safety of persons (e.g. workplace accidents, work-related illnesses) as well as environmental risks such as accidental pollution of water, soil and air, and risks associated with climate change. Our Vigilance Plan enables permanent anticipation and, therefore, prevention, of these risks. These risks are managed by the Site Management directorates. A transversal team in charge of oversight reports to the General Secretary during the semi-annual review coordinated by the ERM department.

Risks regarding human rights and fundamental freedoms particularly concern equality, diversity, harassment prevention and psychosocial issues. These risks are managed by the Human Resources department with the exception of data protection risks, which are coordinated by the data protection officers.



ArianeGroup ensures consistent application of the risk identification and prioritisation methodology by conducting a bi-annual risk review and an annual internal control test campaign. ArianeGroup reports its major risks and their associated action plan (risk mitigation, prevention of serious impacts) for analysis and consolidation in ArianeGroup's risk map.

Additionally, ArianeGroup implements a methodology for mapping risks inherent to the activities of its subcontractors and suppliers. The process associates a level of risk with business activities and their impact on society and the environment. It includes dedicated screening for risks regarding environment, human rights and social risks as well as governance (hereinafter "ESG").

The first step to establishing a risk map is to assess a supplier's overall ESG risk level according to a combination of its risk impact scores and the probability of each respective risk.

After this first mapping process, suppliers with high or very high risk scores undergo further analyses by ESG specialists in order to designate those suppliers who require further preventative measures and/or remedial actions.

Suppliers with low or medium risk scores are approved but undergo regular assessments.

## KEY RISKS IDENTIFIED TO DATE

As of the date of issuance of this Policy Statement, ArianeGroup has identified the following key risk areas it prioritises regarding preventative measures and remedial actions:

- Health, Safety and Environment ("HSE"):
  - exposure to hazardous substances
  - safe working environment
  - managing on-site contractors' HSE management
  - prevention of psychosocial risks
- Equality and Non-Discrimination: discrimination and harassment in the workplace

The risk mapping and required mitigation plan are regularly updated and will be complemented for ArianeGroup GmbH, insofar as required by the Act.

## PREVENTATIVE MEASURES

The comprehensive risk analysis is supplemented by appropriate and effective preventative measures.

The elaboration of these measures is also consistent with multi-stakeholder initiatives in the aerospace sector and with the ArianeGroup Corporate Social Responsibility ("CSR") Policy. The CSR Policy addresses sustainability commitments around three pillars at Group level: Space for People, Space for Environment and Space for Progress.

## POLICIES

Key ArianeGroup Policies have clear expectations as regards its own employees, operations (including affiliates) and suppliers, and include:

- Ethics Charter
- Supplier Ethics Charter
- Health, Safety and Environment Policy
- Sustainability Commitments
- Whistleblowing Procedure

These Policies can be found at <https://ariane.group/en/who-we-are/csr> and <https://ariane.group/en/who-we-are/governance>. The Whistleblowing Procedure is transposed into a Whistleblowing System accessible at <https://ag.1signal.net>.

Based on these standards, company requirements are integrated over time in the ArianeGroup Company Management System ("CMS") and are supported by methods, processes and guidance. Internal capacity-building measures, including training and awareness sessions, also support adherence thereto.



## > Ethics Charter

The ArianeGroup Ethics Charter defines the ethical principles and key company values that govern our way of doing business. It describes the applicable rules, principles and behaviours that all employees should comply with, and guides them in their daily activities.

## > Supplier Ethics Charter

ArianeGroup is determined to ensure the highest standards of responsibility and integrity and expects its partners to share the same values. ArianeGroup therefore requires that its suppliers and subcontractors commit to complying with the Supplier Ethics Charter and cascade the principles therein throughout their own supply chain.

## > Health, Safety and Environment Policy

The HSE Policy sets forth ArianeGroup's commitment to respecting laws and regulations, protecting human life and the environment, preventing pollution and safeguarding property.

The objectives of this policy are:

- to develop standards based on anticipation and prevention in order to mitigate HSE-related risks for the benefit of ArianeGroup personnel and interested parties involved in its activities;
- to guarantee the continuity of company activities by maintaining rigorous standards for the security of facilities, and by controlling environmental impacts; and
- to design, build, test and deliver products and services that meet HSE requirements throughout their life cycle.

The ArianeGroup HSE Performance System was certified as ISO 14001 equivalent in 2018 and has remained thus ever since. The HSE Performance System, which contributes to managing i.a., human rights and environmental risks inherent to ArianeGroup's business, is one of the components of our ERM system.

## > Our Sustainability Commitments

ArianeGroup is committed to sustainability. ArianeGroup strives to ensure that space is a sustainable resource for improving the lives of our planet's inhabitants. ArianeGroup strictly respects laws and regulations. ArianeGroup's vocation is to go further and constantly improve for a better tomorrow, notably by contributing to the United Nations Sustainable Development Goals and the European Green Deal. To this end, ArianeGroup collaborates with its stakeholders in order to maximise our positive impact. ArianeGroup's CSR commitments enable us to channel our purpose and make sure our day-to-day activities are in line with it.

# DUE DILIGENCE

## > In ArianeGroup's Own Operations

Standards of socially responsible behaviour for all ArianeGroup companies, directors and employees are laid out in ArianeGroup's Ethics Charter and Code of Conduct. ArianeGroup verifies adherence thereto through regular monitoring by its internal control department as well as through KPI of its locally embedded HSE teams.

ArianeGroup greatly values a healthy working environment in which employees can feel comfortable and contribute. To this end, ArianeGroup has established a comprehensive risk management for psychosocial stressors as a core element of ArianeGroup's Health Management System. It includes organisational as well as individual measures for supporting employees in professional and private stress situations.

The HSE teams carry out regular risk assessments on psychosocial stress in the organisation. Various stressors and resources are examined by means of digital employee surveys, and evaluated by activity and location to identify specific intervention needs. Subsequently, job design measures are defined and implemented in collaboration with the affected employees. Verifications are carried out individually and through subsequent risk analyses. The process is continuously evaluated and adjusted.



Furthermore, ArianeGroup prioritises the support and training of managers on psychosocial risks, including through regular and on-demand trainings on «healthy leadership». ArianeGroup also offers continuous and evolving measures for sustainable individual health promotion and employee support, including:

- Social counselling, also on site
- Occupational integration management
- Counselling on nursing care
- Regular, varying offers for individual health promotion in the working place

ArianeGroup also maintains clear and comprehensive policies, processes and instructions in place against discrimination and harassment in the workplace in accordance with its Ethics Charter and the International Labour Organization's C190 Violence and Harassment Convention as transposed into the national laws applicable to ArianeGroup companies.

The primary responsibility for monitoring adherence to these principles lies with ArianeGroup's managers, following a lead-by-example approach conveyed through leadership training and e-learning offers. Employees are supported by internal harassment referents and/or on-site social consultants covering all sites of ArianeGroup.

In addition, a complaints procedure under the authority of the Human Resources representative of each ArianeGroup site is in place, allowing for a comprehensive and independent investigation of each alleged violation. The Human Resources representative has full authority to examine the facts of the case, hear witnesses and interview the complainant and alleged offender. These interviews are attended by a representative of the works council (in Germany) or any employee chosen by the alleged offender (in France) in order to safeguard employees' rights and ensure fair and objective treatment of all persons involved. Employees wishing to issue their complaint in full confidentiality and anonymously may instead utilise the ArianeGroup Whistleblowing System, which is available to all affected persons for reporting violations of these principles.

### > In ArianeGroup's Supply Chain

The policies and procedures described in the section «Preventative Measures» above are embedded throughout ArianeGroup's procurement processes regarding the selection, contracting and day-to-day management of our suppliers and subcontractors.

The above policies are transposed into CMS processes defining i.a. ArianeGroup's procurement rules. Thus, in each step of the procurement process, ArianeGroup applies the principles contained herein in our selection criteria, on-boarding process for new suppliers, contractual provisions committing to these principles as well as certification and monitoring of the suppliers' compliance.

Upon conclusion of the initial risk mapping and assessment, ArianeGroup is selecting suppliers taking into account their level of ESG risks. Such risks are identified with our external screening solution and supported by relevant due diligence to be completed by new suppliers during selection phase and verification in case of uncertainties or identified high or very high risks.

### > Contractual Enforcement of our Commitments

ArianeGroup's standard procurement contracts include clauses according to which the suppliers shall comply and ensure the compliance of the work with any and all applicable laws and regulations (in particular, the provisions of labour law, environmental protection, anti-corruption laws, international sanctions, antitrust and competition law, as well as safety and due diligence obligations within the supply chain) of any country in which any part of the work is performed, or affecting or applicable to such work and take all necessary measures to implement them. This shall refer to the suppliers themselves, their personnel and their own suppliers.

The suppliers have to warrant compliance with the requirements set out under the "Requirements applicable to ArianeGroup's Suppliers as a result of legislation relating to the Protection of the Environment and Workers' Health", and to confirm that they comply with ArianeGroup's Supplier Ethics Charter including the principles laid out herein.

ArianeGroup has put specific key performance indicators in place in order to document and foster the express acceptance of our Supplier Ethics Charter, targeting a rate of at least 80% at all times, taking into account transition periods during on-boarding, restructuring etc. Observance of these provisions constitutes an essential obligation for the suppliers and a criterion on which they are selected. ArianeGroup reserves the right to conduct all relevant checks including audits, to verify compliance with these provisions by the suppliers. Failing provision of the necessary proofs or in case of non-compliance with these obligations, ArianeGroup reserves the right to suspend the work or take all appropriate measures, including remedial actions as prescribed by the Act.



## > Awareness and Training

ArianeGroup provides training solutions to all employees via its e-learning platform in order to promote awareness regarding the human rights and environmental impact of each employee's behaviour and the correct implementation of ArianeGroup's policies and CMS processes. Completion of such training is mandatory for all employees in areas identified as bearing a high risk or high impact on human rights and the environment.

ArianeGroup will support its suppliers and subcontractors in accessing relevant training solutions insofar as required as per the assessed risk for human rights or the environment and the capabilities of the supplier or subcontractor.

## > Whistleblowing System

ArianeGroup encourages transparency, trust and respect in its daily operations and its ways of working in order to develop a culture of dialogue, which is essential to incident reporting. ArianeGroup is committed to combatting any form of retaliation against employees who report alerts, as set out in our Ethics Charter. Employees as well as external stakeholders are encouraged to report any situation or behaviour that does not comply with applicable health, safety, environmental and human rights regulations and commitments undertaken in the Ethics Charter.

In addition to internal procedures, and in accordance with legal requirements, ArianeGroup has set up a Whistleblowing System enabling employees and external stakeholders to confidentially report concerns or behaviours contrary to regulations, ethics principles such as human rights or environmental obligations, without fear of retaliation. Individuals can use the dedicated web platform <https://ag.1signal.net> to report complaints, also anonymously, following the procedure available on the platform and within the limits allowed by defence regulations. The whistleblowing procedure details the scope of the whistleblowing system and describes the protection against any form of retaliation for anyone who speaks up in good faith.

The Whistleblowing System, under the supervision of the Group Ethics and Compliance Officer, protects the whistleblower, the facilitator and those linked to the whistleblower. The Human Rights Officer must be involved when the report falls into their perimeter of responsibility.

## > Remediation and Coordination with External Stakeholders

Should ArianeGroup, by means of its Whistleblowing System or through other means, become aware of any occurred or imminent violation of human rights or environmental standards, by its own operations or that of its supply chain, it will engage in the appropriate remedial actions to prevent, end, or minimise the violation. This includes, where possible, restitution of the former state before violation as if the violation had not occurred. Where required or appropriate, ArianeGroup will coordinate these efforts with external stakeholders.

ArianeGroup is an active member of various aerospace and defence industry associations fostering exchanges and coordinating industry efforts on human rights and environmental risks, e.g. the BDLI (German Aerospace Industries Association) and BDSV (German Industry Association for Security and Defence) and GIFAS (French Aerospace Industries Association).

## > External Reporting

ArianeGroup regularly reports on its commitments in its Vigilance Report.

The Duty of Vigilance report can be found on <https://ariane.group/qui-sommes-nous/rse> (in French).

ArianeGroup GmbH as the entity in scope of the Act will furthermore annually issue its report to the German Federal Office for Economic Affairs and Export Control (BAFA) insofar as required under the Act and other applicable laws and regulations.

*More information on ArianeGroup's sustainability commitments and the policies concerned can be found on <https://ariane.group/qui-sommes-nous/rse> (in French).*



## ABOUT THIS STATEMENT


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ArianeGroup will review this Statement periodically. Any updated version thereof resulting from such review will be published accordingly, replace and supersede its preceding version.

The Management Board (*Geschäftsführung*) of ArianeGroup GmbH endorses the principles contained in this Statement and commits to ensure the adherence thereto within its perimeter of responsibility.

*ArianeGroup GmbH, December 2024*

  
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Pierre Godart  
*Geschäftsführer*

  
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Dr.-Ing. Jens Franzeck  
*Geschäftsführer*

