



## DUTY OF VIGILANCE PLAN 2024 REPORT

This document falls within the framework set by Article L. 225-102-1 of the French Commercial Code (French Law No. 2017-399 of March 27, 2017, relating to the duty of vigilance for parent companies and contracting companies).

The Group<sup>1</sup>, of which ArianeGroup Holding is the parent company, meets the legal thresholds for the establishment of a vigilance plan. In this context, together with its Subsidiaries, ArianeGroup Holding has initiated actions designed to identify risks and prevent serious impacts on human rights, fundamental freedoms, and health, safety and the environment resulting from the Group's activities, including relations with subcontractors and suppliers, with a view to establishing a vigilance plan.

This report includes the Group's policy on matters covered by the French Law of March 27, 2017, its actions carried out during the 2024 financial year, and its planned future targets. It is an integral part of ArianeGroup Holding's management report for the year ending December 31, 2024. After submission to the Company's Board of Directors, this report will be published on the Group's website.

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<sup>1</sup> Terms in this report that begin with a capital letter are defined in the glossary in Appendix 1.

## **1. ACTIVITY**

### **1.1 GENERAL PRESENTATION**

As the lead contractor for Europe's Ariane launchers and France's Strategic Oceanic Force (FOST) missiles, ArianeGroup's mission is to "pave the way for European space exploration in order to ensure a safer world for all."

Jointly owned by Airbus and Safran, ArianeGroup brings together all activities and expertise related to civil and military space launchers within a single, integrated company. ArianeGroup also manages a portfolio of space and defense equipment activities, either directly or through its Subsidiaries and affiliates.

The Group employs approximately 8,700 highly skilled employees, mainly in France and Germany. Founded in 2016, ArianeGroup builds on more than 70 years of European space industry history.

### **1.2 BUSINESS AREAS**

ArianeGroup's operations consist of three main areas:

#### **1.2.1 Space Transportation**

ArianeGroup's activities cover the entire life cycle of space launchers, from design to development, production, implementation and marketing of launch services through its Subsidiary Arianespace. On behalf of the European Space Agency (ESA), ArianeGroup developed and operates the Ariane 6 launcher, which successfully completed its inaugural flight on July 9, 2024. As lead contractor and design authority of the launcher, ArianeGroup coordinates an industrial network of more than 600 companies in 13 European countries involved in the Ariane 6 program. ArianeGroup designs innovative and competitive space launch solutions for its institutional, commercial and industrial customers. The Group has significant expertise in state-of-the-art technologies, including complete propulsion systems using all key types of propulsion (cryogenic, storable, and solid) as well as high-performance equipment and materials.

Through its Subsidiary MaiaSpace, ArianeGroup is also developing the semi-reusable Maia launcher, powered by the Prometheus engine, which uses oxygen-methane (methalox) propulsion technology. The launcher's first stage will be both recoverable and reusable.

#### **1.2.2 Defense**

ArianeGroup is a key stakeholder in France's Strategic Oceanic Force (FOST), the at-sea component of the nation's nuclear deterrence. The M51 is a three-stage sea-to-surface submarine-launched ballistic missile (SLBM), designed to be launched from France's nuclear-powered ballistic missile submarines (SSBNs). As lead contractor for the M51 program for the French Defense Procurement and Technology Agency (DGA) on behalf of FOST, ArianeGroup brings together the expertise of more than 900 French industrial companies with a dual objective: the continuous pursuit of the highest levels of performance and national independence. The Group is responsible for the upstream research, design, development and production of missiles, ground-based operational systems, and control and command systems on board submarines. ArianeGroup also ensures the systems' operational maintenance and end-of-life dismantling.

#### **1.2.3 Equipment and Services**

ArianeGroup has extensive expertise in the development and manufacturing of systems and equipment for every stage of space operations, "from launch to orbit and return", including launchers, satellites, space vehicles and landers.

As an expert in orbital propulsion, ArianeGroup supplies complete satellite propulsion systems and sub-systems to all major European prime contractors and to many international customers. ArianeGroup is one of the very few space companies in the world with proven expertise in all major propulsion technologies for space launchers (storable and cryogenic liquid propellants, and solid

propellants) and for orbital systems (monopropellant and bipropellant chemical thrusters, and radio-frequency ion thrusters).

ArianeGroup also offers “turnkey” studies and solutions for space, defense, and security infrastructures, including critical infrastructures, ground systems, operation and control centers, space traffic management systems, and Space Situational Awareness (SSA) systems, particularly through its Helix network of surveillance stations.

Lastly, drawing on its experience using liquid hydrogen in launch vehicle propulsion, ArianeGroup is developing technological solutions to address the specific challenges of liquid hydrogen storage, for use in both aviation and heavy, long-distance transport.

ArianeGroup Subsidiaries have extensive expertise in specific sub-systems and equipment for space, defense and industrial applications, in particular pyrotechnic and mechanical equipment, and optical, optronic, and neutronic systems.

## 2. METHODOLOGY AND GLOBAL APPROACH

This report has been prepared under the supervision of the General Secretary, a member of the Executive Committee, the Executive Vice President of ArianeGroup Holding, and the CEO of ArianeGroup SAS.

The General Secretariat brings together the main departments and functions involved in the definition and management of vigilance measures, including the teams responsible for health, safety, and the environment (HSE), sustainability, climate change, legal, ethics and compliance, data protection officers (DPOs), internal audit, and Subsidiary coordination.

These teams coordinate with other contributing departments, such as risk management and internal control, human resources, and procurement, including the human rights officers. Vigilance measures are also developed in coordination with broader industry initiatives, particularly those led by the French Aerospace Industries Association (GIFAS) and the European Space Agency (ESA).

Furthermore, as a part of the sustainability initiative, an initial materiality analysis was carried out in 2018 to identify the most important issues for the Group. Based on interviews with a diverse panel of internal and external stakeholders (employees, shareholders, customers, suppliers, space agencies, sectoral organizations, civil society and academic stakeholders, etc.), this analysis formed the basis for the Group’s [Sustainability Commitments](#), which were published in 2020.

This sustainability initiative helped to identify key topics, such as promoting diversity and equal opportunities, encouraging work-life balance, ensuring responsible procurement and sub-contracting, and reducing the Group’s carbon footprint.

The management of sustainability issues is led by the General Secretariat’s teams who report to the Sustainability Committee. This sustainability team is also responsible for implementing the Group’s policy at the Subsidiary level.

The Sustainability Committee comprises several members of ArianeGroup’s Executive Committee who are in charge of the most important Sustainability issues for the Group. These members include the CEO, the Director of Human Resources, the General Secretary, and the Chief Strategy & Innovation Officer. Other representatives of the Executive Committee are invited to join the Sustainability Committee meetings on an *ad hoc* basis, depending on the topics. The Group’s sustainability issues are reviewed yearly by the Executive Committee.

An update of the materiality analysis was conducted in 2024, in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD). This analysis was performed based on the double materiality principle: financial materiality, which relates to Environmental, Social, and Governance (ESG) risks and opportunities that could significantly affect the company’s performance; and impact materiality, which measures the impact of the company’s operations.

Impact, risk, and opportunity analyses are conducted across the entire value chain. A consultation conducted with around fifty stakeholders, which included fifteen interviews, helped to clarify the key issues for ArianeGroup and shape the priorities of the Group's ESG policy.

The results of these analyses identified fifteen material issues for ArianeGroup, including climate change, pollution, labor, governance and sovereignty issues.

### 3. ARIANEGROUP AND ITS SUBSIDIARIES

#### 3.1 Mapping and Identification of Major Risks

Every year, ArianeGroup establishes a **comprehensive risk map** that covers the Group's activities. The department responsible for the Enterprise Risk Management (ERM) process and internal control within the finance directorate oversees risk management and creates the risk map. The methodology for identifying, assessing and prioritizing risks is defined in a Group-level procedure. Each identified risk is prioritized according to its probability of occurrence and its impact on the Group'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 mitigation strategies are presented twice a year to the Executive Committee. Risks related to the Group's activities, and the progress and effectiveness of implemented actions are reassessed at these meetings.

The comprehensive risk mapping tools and methodology take into account social and environmental risks included in the duty of vigilance.

The main risks for stakeholders and the environment are those concerning health and safety, in particular industrial and personnel risks (i.e., workplace accidents, work-related illnesses), environmental risks (i.e., accidental pollution of water, soil, or air), and risks associated with climate change.

The Group's vigilance enables the continuous anticipation and prevention of these risks. Risks are primarily managed by site managers (this includes fourteen sites in France, and four in Germany).

Under the responsibility of the General Secretary, a cross-functional team oversees management of risks and reports on their progress during the semi-annual review coordinated by the ERM department.

Identified risks regarding human rights and fundamental freedoms mainly concern issues of equality, diversity, harassment prevention, and psychosocial issues. These risks are managed by Human Resources, with the exception of data protection risks, which are coordinated by Data Protection Officers (DPO).

Subsidiaries apply ArianeGroup's risk identification and prioritization methodology, and adapt it according to their size and specific activities.

ArianeGroup ensures that its Subsidiaries apply the methodology by conducting a bi-annual risk review and an annual internal control test campaign. At the end of the campaign, each Subsidiary issues a "letter of affirmation" in which it commits to implementing and properly applying company risk management and internal control processes.

Subsidiaries report on their major risks and associated action plans (i.e., risk mitigation, prevention of serious impacts), which are then analyzed and consolidated in the Group's risk map. Certain risks identified by the Subsidiaries (e.g., pollution or regulatory compliance risks), linked to the specific nature of their activities and falling under the duty of vigilance, are then appropriately addressed in coordination with Group experts.

#### 3.2 Regular Assessment Procedures

The Group has set up:

- an **internal control** department within the Finance directorate. This department's purpose is to oversee the proper application of about 150 control points defined in a reference framework, and to identify and monitor improvement actions in the event of non-compliance. This internal

control system helps ensure the effective management of the Group's activities, operational efficiency, and optimal use of its resources. It aims to enable the Group to account for significant risks, whether operational, financial, or compliance-related. The framework also includes monitoring the Subsidiaries' implementation of procedures in accordance with applicable regulations for human resources management and health, safety, and environmental requirements, as well as the establishment of the relevant responsibilities.

- an **internal audit** department which reports to the Group's General Secretary. This department is tasked with carrying out audits and analyses on behalf of the Executive Committee and the Audit, Risk, Finance and Compliance Committee (ARFCC) of the Board of Directors. Audits may be requested by members of the Executive Committee, by the ARFCC as part of the Group audit plan, or to address a specific issue. This department provides written reports based on objective and independent analyses, and oversees the implementation of corrective action plans.

Moreover, given that ArianeGroup operates several industrial sites, mainly located in France and Germany, the company is subject to a strict regulatory framework. These sites undergo regular inspections by relevant governmental authorities (including the French Regional Directorates for Economy, Employment, Labor, and Solidarity (DREETS), occupational health services, etc.).

All ArianeGroup sites apply an HSE performance system, which has been certified as ISO 14001 equivalent by an external entity. The system's implementation is monitored by internal and external audits.

### 3.3 Actions to Mitigate Risks or Prevent Serious Impacts

The Group's vigilance plan and its related initiatives are being implemented and are subject to ongoing adjustments.

#### 3.3.1 Code of Ethics

Since its establishment, ArianeGroup has committed to upholding the highest standards in human rights and managing its environmental impact through the adoption of its **Code of Ethics**.

ArianeGroup adheres to the principles outlined in the fundamental conventions of the International Labour Organization (ILO), the guidelines for multinational enterprises of the Organization for Economic Co-operation and Development (OECD), and the United Nations Universal Declaration of Human Rights.

These principles are incorporated into the ArianeGroup Code of Ethics, which defines the ethical standards and core values applicable within the Group. The Code was updated in 2024 to reflect the latest regulations related to sanctions and environmental concerns (climate change).

The Code of Ethics is available in the three main languages of ArianeGroup: German, French and English. The Dutch Subsidiary has translated the core principles into Dutch.

The Code of Ethics is integrated into the internal regulations at the French sites and is provided to every new hire.

The Subsidiaries apply it and have incorporated it into their respective documentation systems.

In 2021, the Group developed an online training program to raise awareness of the principles and standards set out in the Code of Ethics.

#### 3.3.2 Human Rights and Fundamental Freedoms

ArianeGroup's commitments to the protection of human rights and the environment were published in 2024.

ArianeGroup undertakes to safeguard and promote human rights, both within the Group and its supply chain, in accordance with the international standards and principles laid out in:

- the Universal Declaration of Human Rights,
- the United Nations Guiding Principles on Business and Human Rights,
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and

- The International Labour Organization Declaration on Fundamental Principles and Rights at Work.

Human rights officers were appointed in 2024, both at the Group level and within the Subsidiary ArianeGroup GmbH, in accordance with the German LkSG (Supply Chain Act) regulation. Their mission is:

- to implement a strategy aimed at reducing risks to humans and the environment within the value chain,
- to coordinate all associated activities and functions,
- to develop preventive measures, risk assessments, corrective actions, and alert and reporting processes for the relevant authorities.

ArianeGroup has integrated the core principles outlined in the Universal Declaration of Human Rights into its internal regulations and collective agreements, including diversity and equal opportunities, workplace safety and health, the right to rest and paid leave, etc.

ArianeGroup SAS launched this initiative with the signing of an agreement on March 13, 2020, regarding quality of work life and the prevention of psychosocial risks. The provisions of the agreement cover four key areas:

- quality of work life,
- the right to choose when to connect and the right to disconnect,
- the prevention of psychosocial risks, including the prevention of moral and sexual harassment, sexism, workplace violence, and work-related stress, and
- the prevention of discrimination.

The measures outlined in this agreement are part of an ongoing action plan.

#### **(a) Combating discrimination**

As part of its broader policy to combat all forms of discrimination, ArianeGroup is committed to preventing and addressing potential instances of discrimination through specific initiatives defined in company agreements and in compliance with applicable regulations.

Preventive measures are implemented particularly in areas such as recruitment, employment, and access to professional training. At ArianeGroup, human resources management processes are based solely on aligning professional skills with the Group's needs.

Under the aforementioned March 13, 2020 agreement, ArianeGroup has established a comprehensive and unified policy aimed at preventing and addressing any alleged discrimination, regardless of its nature, through a dedicated procedure.

In addition, ArianeGroup provides employees with tools to inform and raise awareness of the measures that the company has put into place. Regular communications on this topic are made to all employees.

#### ***Gender equality in the workplace***

Promoting gender diversity and professional equality between women and men is a core part of ArianeGroup's corporate identity. It is a constant objective and a key lever for attracting top talent, no matter the gender. This policy encourages diversity of skills, fosters creativity and innovation, and promotes a wide range of perspectives.

In November 2020, ArianeGroup SAS signed a long-term agreement on gender diversity and professional equality.

This agreement strengthens ArianeGroup's diversity policy by building on existing initiatives and establishing new momentum across several strategic areas.

It outlines specific measures to prevent discrimination during the recruitment process. Stakeholders involved in the recruitment process, including HR personnel, managers and the external recruitment partners, have been trained to promote diversity, to understand the company's



challenges and commitments, and to comply with the relevant legal framework. Additionally, manager awareness is reinforced at the start of every recruitment campaign.

ArianeGroup SAS also maintains a permanent process for monitoring and addressing salary equity, allowing systematic analysis of men's and women's compensation before salary decisions are made. This process helps assess any potential pay gaps. In the event that potentially unwarranted salary discrepancies are identified, a detailed review is carried out, and if necessary, the salary is adjusted over one or more financial years.

The aforementioned agreement also defines tracking indicators for areas such as recruitment, compensation, training, and promotions.

Furthermore, ArianeGroup's Executive Committee has outlined its mid-term goals aimed at increasing the number of women in leadership positions, in accordance with applicable legislation.

The Group's French Subsidiaries are subject to the same regulatory framework, and as such, implement gender equality policies to prevent risks of discrimination. In particular, the French Subsidiaries with more than 50 employees are required to calculate and publish a gender equality index.

#### ▪ GENDER EQUALITY INDEX

ArianeGroup SAS's overall score for 2024, based on the gender equality index defined by the French Law of September 5, 2018, was 89/100 (compared to 89/100 in 2023 and 2022).

### ***Employment integration and retention of people with disabilities***

ArianeGroup implements a diversity policy, which includes measures for the recruitment, retention and career development of people with disabilities.

Following the initial agreement signed in 2019, ArianeGroup SAS and the French association managing the fund for the integration of disabled people (AGEFIPH) signed a new agreement in June 2021, effective until December 31, 2024. Through this partnership with AGEFIPH, ArianeGroup renewed its commitment to disability inclusion across all its sites by introducing new measures to promote hiring, support job retention, enhance skill development for employees with disabilities, and anticipate risks of professional exclusion.

Implementation of these initiatives is coordinated by a network of disability representatives appointed at each ArianeGroup SAS site. Each site's disability representative works closely with internal and external stakeholders to assess and implement multidisciplinary solutions that support job retention for employees with disabilities.

The network of disability representatives is led by the ArianeGroup Disability Mission, which is part of the Diversity department within the Human Resources directorate.

A similar approach has been adopted at ArianeGroup GmbH, where representatives for inclusion and employees with disabilities have been appointed at each site.

### **(b) Preventing moral and sexual harassment, sexism, and workplace violence**

ArianeGroup is committed to respecting and upholding the dignity and privacy of every employee. The company maintains a zero-tolerance policy toward all forms of harassment, sexism, and workplace violence.

ArianeGroup strives to take any necessary action to prevent and address such misconduct.

Since its establishment, ArianeGroup SAS has outlined procedures for managing such matters. The aforementioned agreement of March 13, 2020 further strengthened these measures. The agreement defined a comprehensive and standardized approach for preventing and addressing situations of alleged harassment, sexism, and workplace violence, through a dedicated procedure. It also ensures protection not only for victims but also for witnesses.

To prevent such situations, ArianeGroup provides employees with tools to inform and raise awareness of the measures that the company has put into place.

Furthermore, in accordance with the French law on career freedom and professional future of September 5, 2018, ArianeGroup SAS and several of its Subsidiaries have designated sexual harassment prevention officers. ArianeGroup SAS has extended these officers' mission to also include prevention of moral harassment and workplace violence.

To ensure proximity with employees, ArianeGroup SAS opted to appoint harassment officers at the site level, rather than Group level, designating two per site. These harassment officers serve as direct points of contact for employees who feel they have been subjected to such situations. Their job is to listen and provide information and guidance.

### **(c) Workplace stress prevention**

ArianeGroup places significant emphasis on preventing psychosocial risks (PSR) and workplace stress.

Since ArianeGroup's founding and as a part of its restructuring, senior management launched stress prevention initiatives to support staff through the organizational changes and to mitigate potential negative effects on employees.

At ArianeGroup, preventive measures are structured around three levels of prevention (primary, secondary, and tertiary), and are continuously implemented across the company. They include both proactive planning for organizational changes and targeted support for individual or collective stress situations.

ArianeGroup has introduced:

- a risk assessment for change-related stress: this anticipates and addresses the human impact of projects that affect employment or working conditions (e.g., reorganization, restructuring, or relocation). A human impact study is conducted during the planning phase of such projects to assess the potential consequences for employees.
- a process for detecting and assessing collective stress, conducted regularly at each site in several stages:
  - o a preliminary diagnosis based on medical and social indicators to identify potential psychosocial risk factors in the site's different departments;
  - o an in-depth diagnosis in areas where potential risks are identified, leading to the development of an action plan to mitigate those risks.

Lastly, ArianeGroup has established a process for handling stressful situations involving internal and/or external stakeholders based on employee needs.

Furthermore, to strengthen existing measures, ArianeGroup also implements specific, context-driven initiatives.

Under the March 2020 agreement on quality of work life and PSR prevention, ArianeGroup SAS introduced a comprehensive, standardized approach for preventing workplace stress.

To strengthen primary prevention and anticipate risk factors, ArianeGroup has asked managers to establish a stress prevention action plan for their teams. Since 2019, managers have been trained to conduct team diagnostics and design stress-prevention plans. Managers must review and update these action plans annually. The Human Resources staff supporting these managers have also been trained to assist in this process. In addition, ArianeGroup SAS provides ongoing training for both managers and local HR staff throughout the year, via dedicated training modules.

The company also conducts information and awareness campaigns for employees. During these campaigns, employees are reminded about the toll-free psychological assistance hotline, available 24/7 and year round. This hotline allows employees to talk freely and confidentially about personal or professional challenges.

At ArianeGroup GmbH, a psychosocial risk assessment survey is distributed regularly. Based on the results, the company organizes specific workshops when needed.



ArianeGroup has launched several initiatives to improve employee's quality of work life and, in particular, to promote work-life balance. These include:

- the publication of a Charter on the right to choose when to connect and the right to disconnect;
- the rollout of remote working programs at ArianeGroup SAS and ArianeGroup GmbH.

#### **(d) Protection of privacy and personal data**

ArianeGroup respects and protects the privacy of individuals, and the related rights of its employees, customers, suppliers, and third-party partners.

Data Protection Officers (DPO), based in France for ArianeGroup Holding and ArianeGroup SAS, and in Germany for ArianeGroup GmbH, are responsible for advising and supporting these companies in achieving and maintaining compliance with data protection regulations. They oversee the implementation of action plans designed to prevent any breaches of individual privacy rights, ensuring the protection of personal data and privacy.

The multi-year action plans are structured around the following key areas:

- the implementation of GDPR governance (European Regulation No. 2016/679, known as the General Data Protection Regulation);
- enhanced training on data protection risks and best practices, targeting high-risk departments (such as Human Resources, IT, and administrative staff), alongside a digital training module for all employees and in-house training courses listed in the ArianeGroup training catalog;
- conducting Privacy Impact Assessments;
- supporting procurement teams in ensuring supplier compliance;
- integrating a Privacy by Design approach into major projects that involve the processing of personal data;

In 2024, ArianeGroup's efforts focused primarily on employee training and communication, conducting internal audits according to a predefined schedule and current developments, following up on actions from previous audits, and integrating the GDPR principles of Privacy by Design and Privacy by Default into corporate processes and projects.

The Group's Subsidiaries focused on auditing specific activities according to a pre-defined schedule and analyzing GDPR compliance in the early stages of new projects, in accordance with the Privacy by Design and Privacy by Default principles. Details of these GDPR governance actions are documented in the DPOs' activity report submitted to ArianeGroup's leadership team.

### **3.3.3 Health, Safety and Environment (HSE)**

#### **(a) HSE policy**

The Group's HSE policy, originally adopted in 2016 when the company was founded, was last updated in April 2023. The Group aims to be a benchmark in the field of health and safety. This ambition is reflected in a commitment signed by the CEO of ArianeGroup and implemented across all company sites to effectively address local challenges.

The HSE policy provides a consistent framework for the Group's various entities, guiding their own policies and action plans. It applies to both employees and to subcontractors operating at ArianeGroup sites and facilities.

The HSE policy's core priorities underscore ArianeGroup's commitment to complying with laws and regulations, protecting human life, respecting the environment, preventing pollution, and safeguarding company assets.

The policy is built around the following objectives:

- foster a proactive, preventive culture to manage HSE-related risks for all ArianeGroup personnel and stakeholders involved in its operations;
- ensuring business continuity by maintaining strict safety standards for facilities and minimizing environmental impact;

- incorporating HSE requirements into the design, production, testing, and delivery of products and services throughout their life cycle.



As a leader in the space and military launchers industry that operates in a highly competitive, high-technology environment, ArianeGroup considers the protection of health, safety and the environment to be a top priority. ArianeGroup has a policy and a referential, and invests in order to continuously improve its Performance System and achieve standards of excellence in HSE.

## HEALTH, SAFETY AND ENVIRONMENT POLICY (HSE)



The purpose of the Health, Safety and Environment policy is to:

- Develop an anticipatory and preventive culture to manage Health, occupational Safety and Environment risks, in order to protect personnel, partners, suppliers, customers and all interested parties in the vicinity of its activities;
- Guarantee the continuity of the company's operations by maintaining high standards of safety in its facilities and controlling their environmental impacts;
- Design, manufacture, test and deliver products and services that meet the Health, Safety and Environment requirements throughout their life cycle.

The following principles of guidance and governance are applied in order to reach these objectives:

- Comply with the legal requirements in force and all other applicable requirements;
- Identify the risks to personnel, the means of production and the environment inherent in a process or operation, and eliminate the risks, or at least reduce their effects as much as possible, prior to implementation;
- Inform and train all personnel performing activities or operations subject to risks;
- Promote actions that make a significant contribution to protecting the health of personnel, improving safety and protecting the environment, and take these criteria into consideration when assessing the current activity.

Management undertakes to prove the technical, financial and organizational resources that are necessary to implement this policy within each site.

The Sites, Security and Export Controls Department coordinates the deployment and control of the implementation of this policy, and the associated referential with:

- the Heads of sites, who undertake to make this policy known and to implement it with all the managers, personnel, partners and other stakeholders;
- the HSE teams, which undertake to promote best practices to managers and Head of sites, in order to guarantee a consistent deployment and shared objectives in the operational and functional processes;
- managers, who play a key role in the everyday implementation.

Achieving these objectives also depends on the commitment of every single employee in applying this policy.

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### **HSE Performance System**

To implement this policy, ArianeGroup relies on its HSE performance system, which obtained certification as ISO 14001 equivalent in 2018.

This system is a key component of ArianeGroup's overall management system, and helps to manage HSE risks associated with the company's operations.

It is structured around three pillars: anticipation, operational control, and collective commitment.

The main goals of the system are to ensure safe and healthy working environments, manage technological risks and their environmental consequences, control energy consumption, and establish an HSE performance optimization program.

At each ArianeGroup site, implementation of the HSE performance system includes setting up an organizational structure, defining roles and responsibilities, applying procedures, reviewing and updating HSE policies, and continuously improving HSE outcomes. All lost-time accidents are thoroughly analyzed, and corrective and preventive measures are implemented by HSE and operational teams.

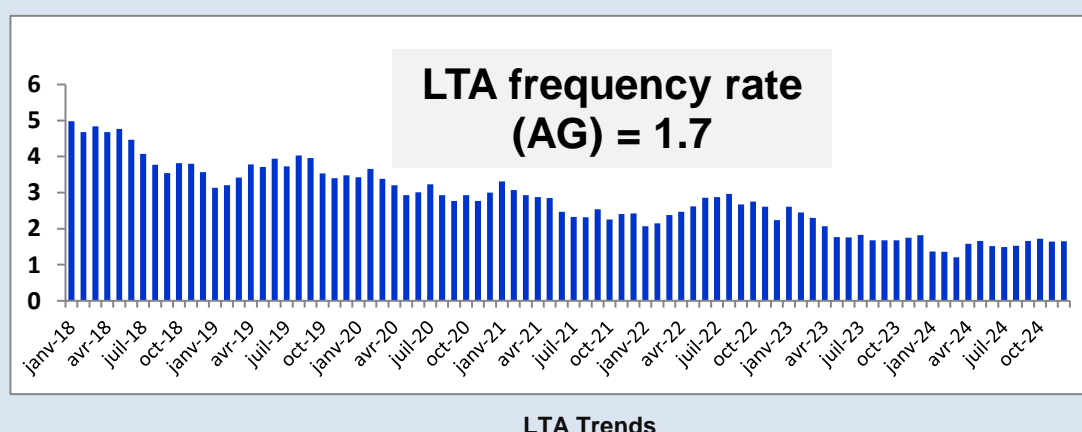
In 2024, Group performance improvement targets were established and communicated to all employees. The achievement of these targets contributes to the overall assessment of company performance and executive compensation.

## WORKPLACE ACCIDENTS

The HSE performance system led to a sustained reduction in the **Lost Time Accident frequency rate (LTA frequency rate<sup>2</sup>)** in 2024.

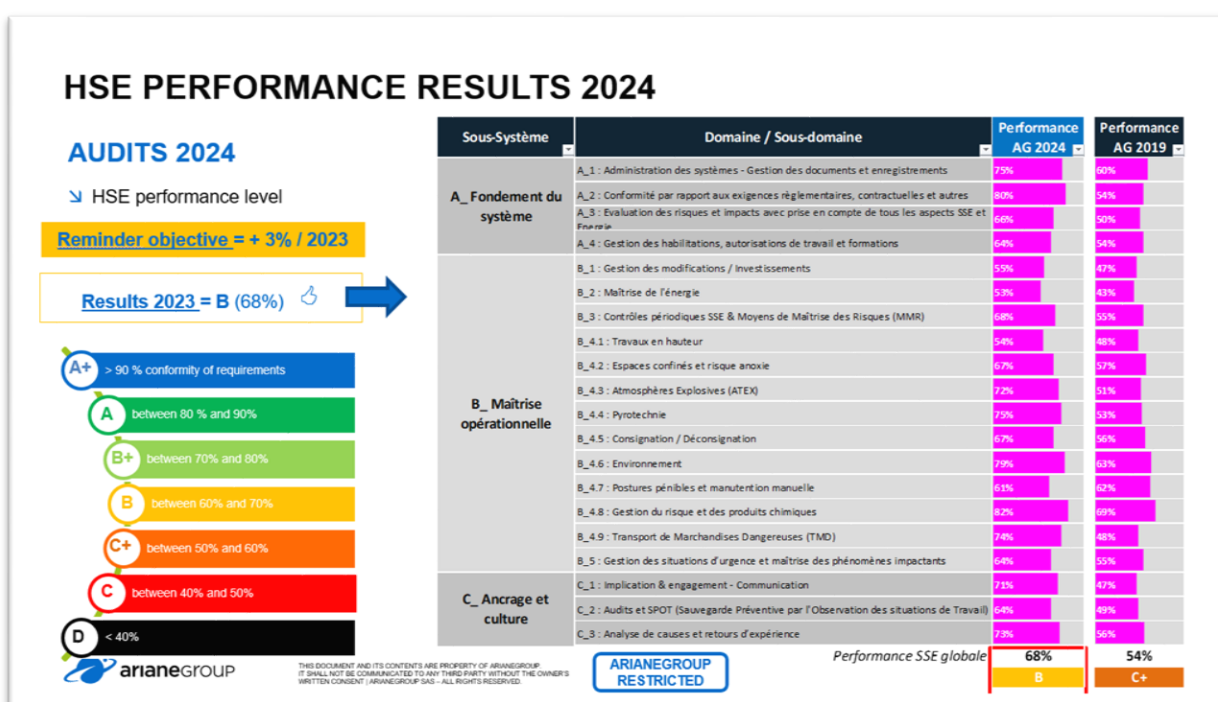
At the **end of 2024**, the company's LTA frequency rate was 1.7, reflecting continued progress and ranking ArianeGroup among the top performers in the aerospace manufacturing industry.

The number of recognized lost-time accidents has continued to decline, with 22 in 2024, compared with 24 in 2023, 29 in 2022, 33 in 2021, 39 in 2020, 48 in 2019, and 50 in 2018.



In 2024, all French and German sites were audited to assess their HSE performance.

<sup>2</sup> LTA frequency rate = the number of accidents with more than one day of lost time, over a 12-month period, per million hours worked.



The foundational criteria of the HSE performance system are now well established. In the coming years, performance improvement will focus on controlling the most critical safety risks and ensuring the long-term sustainability of performance gains.

## HSE TRAINING

In 2024, employee health and safety remained a top priority in the company's internal training programs.

A total of 32,293 hours of HSE training were provided, reaching a total of 2,739 ArianeGroup employees.

## (b) Greenhouse gas emissions report

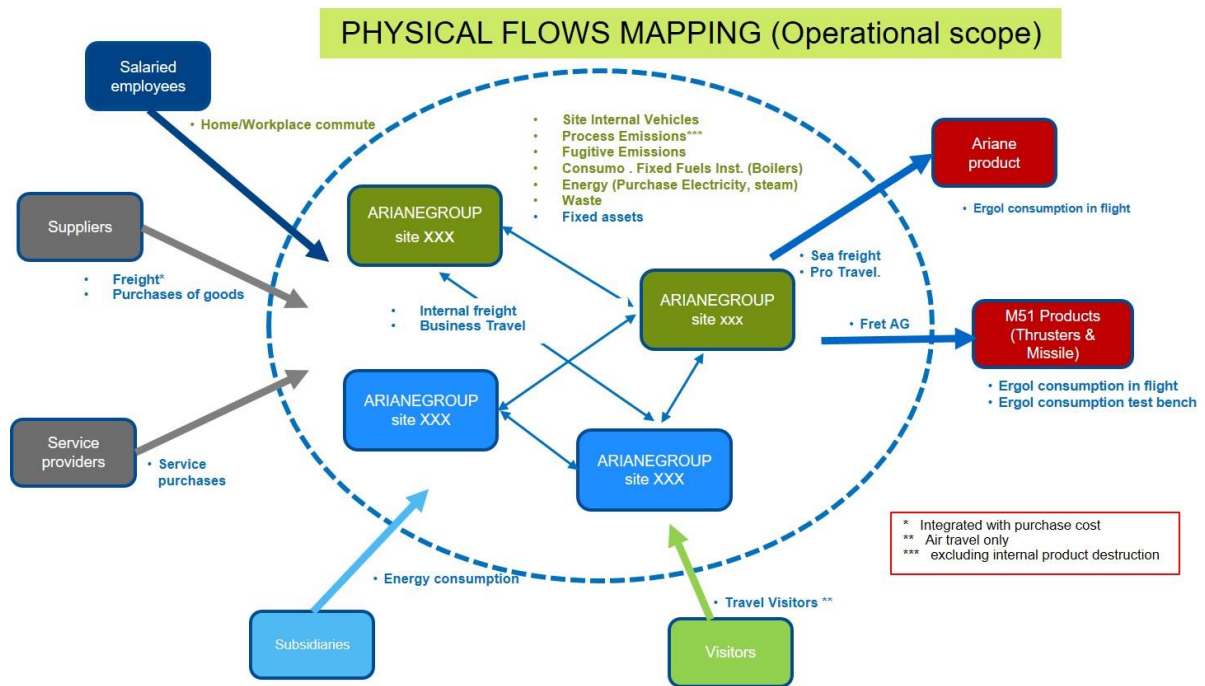
In 2023, ArianeGroup updated its greenhouse gas emissions report, more commonly referred to as its carbon footprint, covering all its operations in France and Germany, with partial inclusion of its Subsidiaries and affiliates (Scopes 1 & 2 only).

This report covers the following elements:

- Scope 1 or Category 1: direct emissions from the burning of fossil fuels (natural gas, fuel, non-road diesel, etc.) or non-fossil fuels (biomass fuel, biogas, etc.) within company facilities or vehicles, as well as process emissions and fugitive emissions (mainly from refrigerants used in HVAC systems);
- Scope 2 or Category 2: indirect emissions from the purchase of energy such as electricity and steam;
- Scope 3 (Categories 3 to 6): all other indirect emissions from the value chain. This includes emissions associated with the transport of goods (freight) and people (Category 3), the purchase of goods or services (Category 4), and emissions associated with the use of ArianeGroup's products (Category 5).

All of these emissions are represented in the infographic below.





In 2024, ArianeGroup adopted a climate policy and introduced a decarbonization roadmap through to 2030.





Key findings from the 2023 emissions report, published in 2024, are presented in the diagram below.



In 2024, ArianeGroup launched an internal carbon pricing mechanism, designed to incorporate greenhouse gas emissions into the selection criteria for investment projects.

## 4. SUPPLIERS AND SUBCONTRACTORS

ArianeGroup is committed to upholding the highest standards of responsibility and integrity, and aims to work with partners who share these values.

Since its establishment, the Group has demonstrated this commitment through a responsible procurement policy, outlined in its updated Supplier Code of Ethics from 2024, and overseen by the procurements directorate.

### 4.1 Risk Mapping and Regular Assessment Procedures

The procurements, ethics and compliance, and sustainability teams have developed a methodology and a Case Management System for mapping risks inherent in subcontractor and supplier operations. This system assigns a risk level to each third party based on the impact of their operations on the company and stakeholders. Among the key risk categories assessed in the overall supplier and procurement risk management process are Anti-Corruption and Anti-Money Laundering (AC-AML) and Environmental, Social, and Governance (ESG) risks.

The first step in the AC-AML & ESG mapping process is to assess a supplier's overall risk level based on a matrix that combines their risk probability and risk impact scores.

#### **Risk Probability**

Risk probability is based primarily on external factors, such as the supplier's countries of operation and industrial sectors (based on the NACE classification). ArianeGroup uses the ESG Index developed by the Swiss company Global Risk Profile (GRP), designed to meet legal requirements related to Corporate Social Responsibility and duty of vigilance. This index draws on recognized and official data sources from relevant fields. Its overall score takes into account the three areas set forth in France's duty of vigilance law.

The ESG index can be broken down into three sub-indexes:

- measurement of environmental risks;
- measurement of human rights and fundamental freedoms risks;
- measurement of health and safety risks.

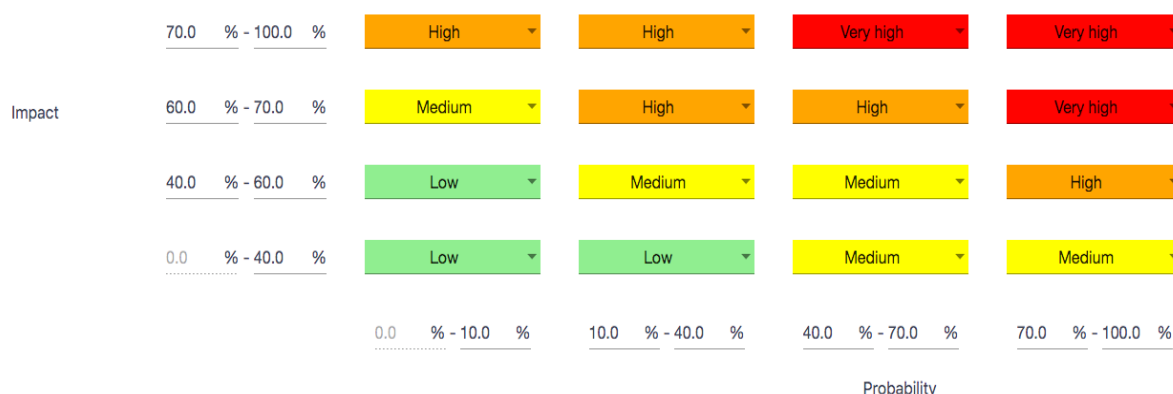
#### **Risk Impact**

In addition to the probability score, the impact score adjusts the supplier's risk level according to its criticality with regard to ArianeGroup's operations. Impact is calculated according to certain

supplier characteristics and the supplier's relationship with ArianeGroup, in particular the supplier's size, strategic role, purchase volume, and frequency of transactions.

### **ArianeGroup risk matrix**

The combination of the probability score and impact score places each third party into one of four risk levels, in accordance with the Enterprise Risk Management (ERM) team's risk assessment procedure. This score is then input into the tools used to assess the overall supplier risk.



Following this initial mapping, suppliers classified in the high or very high risk levels are subject to further screening and/or risk mitigation procedures.

Suppliers with low or medium risk scores are approved and re-evaluated at regular intervals.

Over 5,500 third parties are monitored through this process, and 91% of suppliers are identified as having a low or medium risk profile. This is largely due to the makeup of the supplier base, and in particular, where they are located. 96% are based in France or Germany, countries where regulatory compliance facilitates the enforcement of duty of vigilance requirements.

During the screening phase, supplier's risk profiles are individually analyzed. This can sometimes result in a reduced risk rating after the report is analyzed. Supplier screening reports that confirm a high or very high risk level (about 7% of suppliers) prompt the implementation of risk reduction action plans (see below).

## **4.2 Actions to Mitigate Risks or Prevent Serious Impacts**

The principles outlined in ArianeGroup's Code of Ethics are reiterated in the Supplier Code of Ethics, which applies to contractual relationships between ArianeGroup and its subcontractors and suppliers.

In 2024, ArianeGroup updated its Supplier Code of Ethics to clarify the sections on human rights, whistleblowing, environmental efficiency, and responsible procurement, including enforcement of duty of vigilance requirements throughout the supply chain and in consideration of the recent German legislation. In particular, this update reinforces ArianeGroup's expectation that suppliers implement the Code of Ethics, as well as the consequences of any non-compliance.

The Supplier Code of Ethics was updated to include specific environmental requirements and is referenced in the company's Terms and Conditions of Purchase and in contracts or purchase orders issued to suppliers and subcontractors.

All subsidiaries apply the ArianeGroup Supplier Code of Ethics, using methods adapted to their individual procurement processes.

The commitment of ArianeGroup's subcontractors and suppliers to uphold the principles of the Code and to enforce it within their own supply chain is an integral part of the company's Responsible Purchasing action plan. This plan aims, in particular, to promote and enforce good practices related to human rights, ethics, health, safety and the environment.

The following are examples of risk reduction action plans:

- the Integrity Letter, targeting large groups and based on their CSR and compliance frameworks;
- the official implementation of our Supplier Code of Ethics, with a request for formal agreement from high risk suppliers (around thirty);
- a supplementary Compliance survey, which helps gather and complete data on the measures taken by suppliers in relation to their risk mapping score;
- a decarbonization survey, which collects data on calculation methods, emission levels, and specific actions taken by major suppliers to reduce their environmental impact.

Consequently, the requirements set forth in the Supplier Code of Ethics are now thoroughly integrated into the prevention and management of supplier-related risks, alongside other risk types (e.g., financial, dependency, quality, delivery, or risks related to being a sole-source provider). These risks are managed jointly, and their assessment is presented to the Executive Committee in a consolidated report.

Actions are managed as part of the Responsible Purchasing roadmap within the procurements directorate, in close coordination with the company's sustainability and climate change activities.

## **5. REPORTING AND PROCESSING CONCERNS**

ArianeGroup encourages transparency, trust and mutual respect in its daily operations and working methods in order to foster open communication, encouraging employees to speak freely, in accordance with the commitments set out in the Code of Ethics and Code of Conduct.

ArianeGroup does not tolerate any form of retaliation or attempted retaliation, direct or indirect, against employees who speak up in good faith and without any direct financial compensation.

Employees and other temporary or external employees of ArianeGroup or its Subsidiaries are encouraged to report any situation or conduct that violates the principles of the Code of Ethics and the Supplier Code of Ethics through the dedicated platform (<https://ag.1signal.net>), managed by the Group Ethics and Compliance Officer. This platform enables the confidential reporting and processing of concerns, including those related to the duty of vigilance such as human rights, fundamental freedoms, health, safety, and environmental protection.

ArianeGroup's whistleblowing procedure complies with applicable legislation (French Law No. 2022-401 of March 21, 2022, aimed at improving whistleblower protection, and French Decree No. 2022-1284 of October 3, 2022, concerning procedures for collecting and processing whistleblower reports and listing relevant external authorities).

## **6. MONITORING SYSTEM**

Operational teams monitor the implemented measures based on the company's annual objectives. These teams are responsible for:

- defining action plans and associated monitoring indicators;
- preparing bi-annual Enterprise Risk Management (ERM) reviews;
- preparing the Sustainability Committee meetings;
- identifying areas for improvement and making necessary process adjustments, particularly those determined during internal audits, certification audits, and audits conducted by competent public authorities, customers, or shareholders.

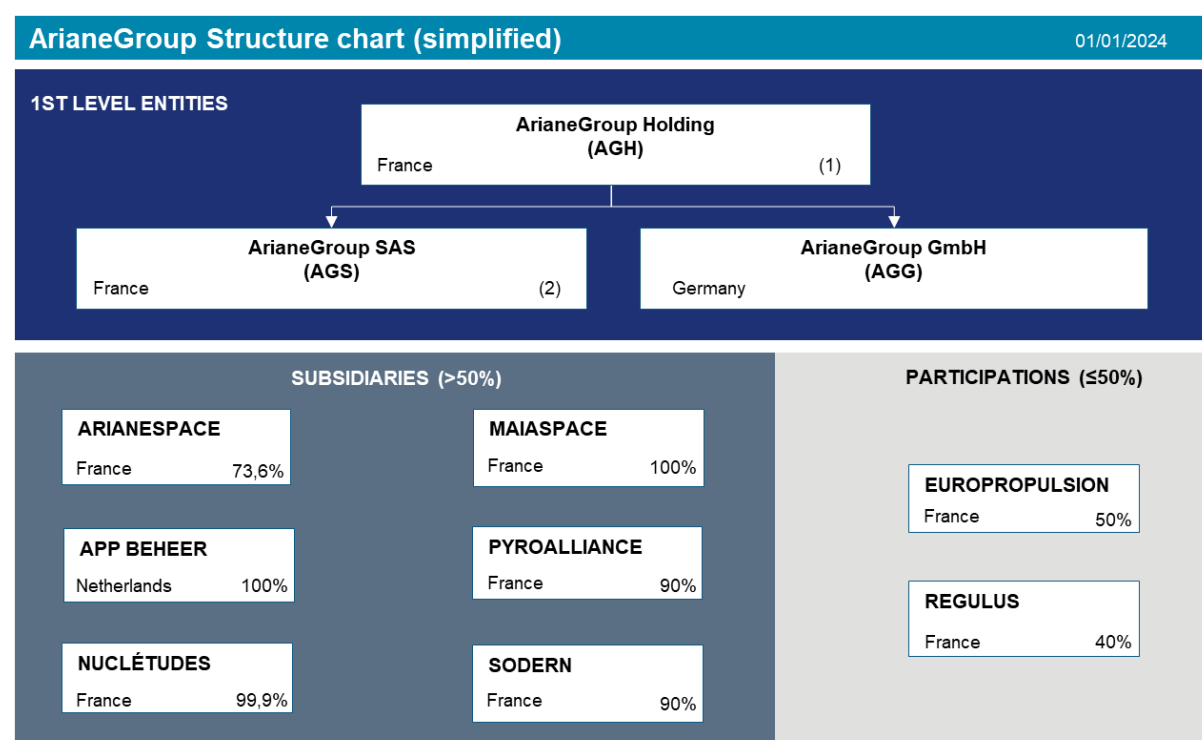
Improvements achievement are consolidated in this report, reviewed by the Executive Committee, validated by the General Secretary, and submitted to the Board of Directors for approval.

## Appendix 1 – Glossary

Terms and acronyms that are capitalized in this report have been defined below:

ArianeGroup	means ArianeGroup Holding (parent company) and its first-tier Subsidiaries (ArianeGroup SAS and ArianeGroup GmbH)
ARFCC	means the Audit & Risks, Finance, and Compliance Committee of the Board of Directors of ArianeGroup Holding
Group	means ArianeGroup Holding and its direct or indirect Subsidiaries
Executive Committee	means the ArianeGroup management committee
Board of Directors	means the Board of Directors of ArianeGroup Holding
Subsidiaries	means the companies controlled under Section II of Article L. 233-16 of the French Commercial Code, as listed in Appendix 2

## Appendix 2 – Group Operations



(1) AGH is held 50/50 by Airbus and Safran | (2) AGS is held 100% by AGH except one preference share (French State)

## A GROUP WITH COMPLEMENTARY EXPERTISE

