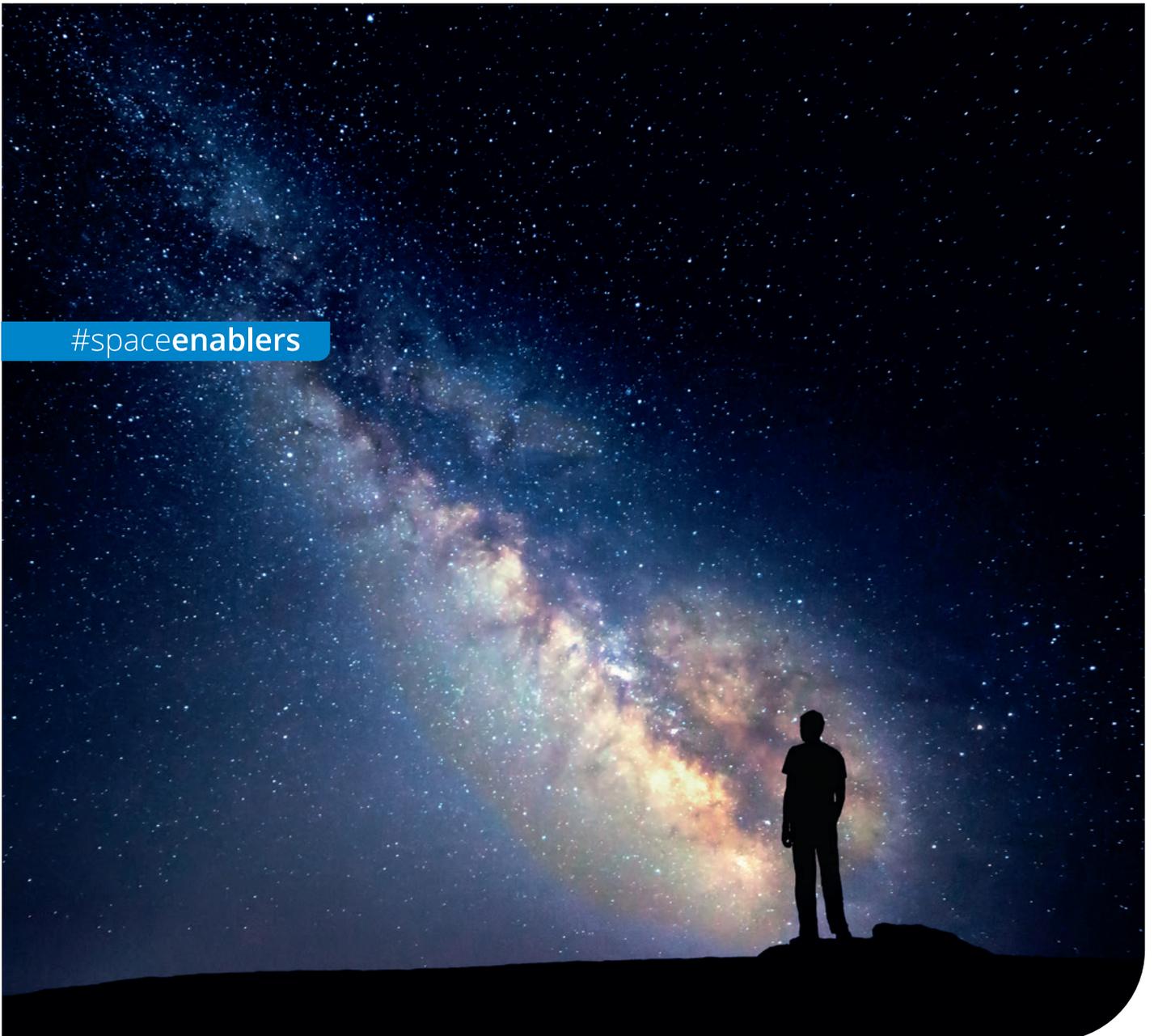




**ariane**GROUP

# ETHICS CHARTER

#spaceenablers



# ETHICS CHARTER

**At ArianeGroup, we conduct our business with integrity and pursue the highest standards of Ethics and Corporate Social Responsibility, which we consider to be a crucial part of business excellence. We aim to foster sustainable growth and to build a better tomorrow for our employees and our stakeholders.**

---

This Ethics Charter aims to provide guidance in key areas in order to help us always operate in accordance with our company's values. It applies to all ArianeGroup employees. Unless stated otherwise, any reference to ArianeGroup in this Ethics Charter refers to ArianeGroup and its subsidiaries<sup>1</sup>.

This Charter 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, internal policies or standards, and report any concerns.

Each and every one of us has an individual and collective responsibility to comply with and promote the standards given in the Ethics Charter.

We also recognize our responsibility to uphold these standards across the extended enterprise with all ArianeGroup stakeholders, and in particular in our supply chain, through the ArianeGroup *Supplier Ethics Charter*.

---

<sup>1</sup> - A subsidiary being defined as any entity in which ArianeGroup Holding directly or indirectly holds more than 50% of the shares and/or voting rights



# TABLE OF CONTENTS



## 1. FOCUSING ON PEOPLE

PAGE 4

- 1.1 Respecting people
  - 1.2 Ensuring workplace health and safety
  - 1.3 Encouraging open dialogue and whistleblowing
  - 1.4 Promoting diversity and fostering our talent
  - 1.5 Protecting privacy and personal data
- 

## 2. RESPECTING AND PROTECTING ASSETS AND INFORMATION

PAGE 6

- 2.1 Protecting our assets
  - 2.2 Communicating and protecting our image
  - 2.3 Protecting third-party information
  - 2.4 Complying with defense regulations
  - 2.5 Maintaining accurate records
  - 2.6 Trading securities
- 

## 3. ENGAGING IN RESPONSIBLE BUSINESS PRACTICES

PAGE 8

- 3.1 Respecting our customers
  - 3.2 Committing to product safety and quality
  - 3.3 Ensuring mutually beneficial relationships with suppliers and subcontractors
  - 3.4 Zero tolerance of corruption
  - 3.5 Avoiding conflicts of interest
  - 3.6 Competing and operating fairly
  - 3.7 Combatting money laundering
  - 3.8 Complying with import and export laws
  - 3.9 Ensuring fair relations with shareholders
  - 3.10 Cooperating with authorities
- 

## 4. WORKING TOWARDS SUSTAINABILITY

PAGE 11

- 4.1 Establishing responsible business standards at every level
  - 4.2 Conducting responsible sourcing
  - 4.3 Developing our local communities
  - 4.4 Striving for eco-efficiency
  - 4.5 Building a better tomorrow
-

---

# 1. FOCUSING ON PEOPLE

**People are ArianeGroup's most precious asset.  
We foster the continued engagement of employees at all levels  
and promote an environment of trust and collaboration amongst teams  
in order to achieve collective success.**

## 1.1. Respecting people

We recognize that fully respecting employees' rights fosters a positive workplace environment that boosts innovation, a key to our competitiveness.

We are committed to safeguarding and promoting human rights, as defined by the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, internally and throughout our supply chain. We condemn human trafficking, all forms of forced labor and modern slavery, and child labor.

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

---

## 1.2. Ensuring workplace health and safety

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

We are responsible for reporting any risk situation or incident to our manager, the person responsible for Health, Safety & Environment or, for specific risks, the person in charge of radiation protection/nuclear safety.

---

## 1.3. Encouraging open dialogue and whistleblowing

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 also encourage all employees to report any situation or behavior conflicting with the Ethics Charter through regular business channels such as the line manager or a Human Resources, Ethics & Compliance, or Legal representative, who shall give them appropriate support in return.

In addition, the dedicated ArianeGroup confidential alert system or existing subsidiary-specific alert system may be used.

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

---

# FOCUSING ON PEOPLE

## 1.4. Promoting diversity and fostering our talent

In keeping with our focus on excellence, we aim to attract and retain leading-edge talent and consider diversity one of our greatest strengths.

We support diversity of all kinds and we do not tolerate any form of discrimination.

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

While fostering individuality contributes to rich cultural diversity, our high-performance culture requires us to constantly promote the ArianeGroup's common values and behaviors in our dealings with each other and with our stakeholders.

---

## 1.5. Protecting privacy and personal data

We always respect and protect individuals' privacy and related rights of employees, customers, suppliers and third parties. While we may collect, process, use, and store employees' and third parties' personal data in the undertaking of our operational activities, we must also ensure that the way we deal with them is compliant with all applicable obligations and in particular with the European Union General Data Protection Regulation 2016/679 (GDPR) as well as national data protection regulations.

ArianeGroup's or subsidiaries' Data Protection Officers (DPOs) should be contacted for any query.

---



---

## 2. RESPECTING AND PROTECTING ASSETS AND INFORMATION

**Protecting our property, our information, our competencies, and our know-how, as well as any assets entrusted to us, is key in order to both build trust and maintain our competitiveness.**

**We must constantly work to ensure that none of these assets is stolen, damaged, misused or improperly destroyed.**

### 2.1. Protecting our assets

We each have a duty to protect ArianeGroup's assets, both tangible and intangible. To this regard, we comply with Security and Cyberdefense policies as well as applicable laws and regulations.

We treat all property entrusted to us in a professional manner and in support of ArianeGroup's 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 sensitive information is strictly on a need-to-know basis. It can only be disclosed to 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 the intellectual property rights of others.

---

### 2.2. Communicating and protecting our image

ArianeGroup's reputation is a very important asset. It is therefore crucial that we promote and protect our image. 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 under any circumstances provide information or engage in social media activities on behalf of ArianeGroup.

In addition, ArianeGroup sponsorships shall be in line with our strategic focus and our ethical standards and must always be transparent and accurately recorded in company books and records.

---

### 2.3. Protecting third-party information

Our customers, suppliers, and other partners often entrust us with their own confidential and proprietary information. As 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.

---

# RESPECTING AND PROTECTING ASSETS AND INFORMATION

## 2.4. 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 ArianeGroup Security department or the person responsible for Security in subsidiaries.

---

## 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 applicable internal control procedures. We must not create or participate in the creation of records that mislead or conceal any improper activity.

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

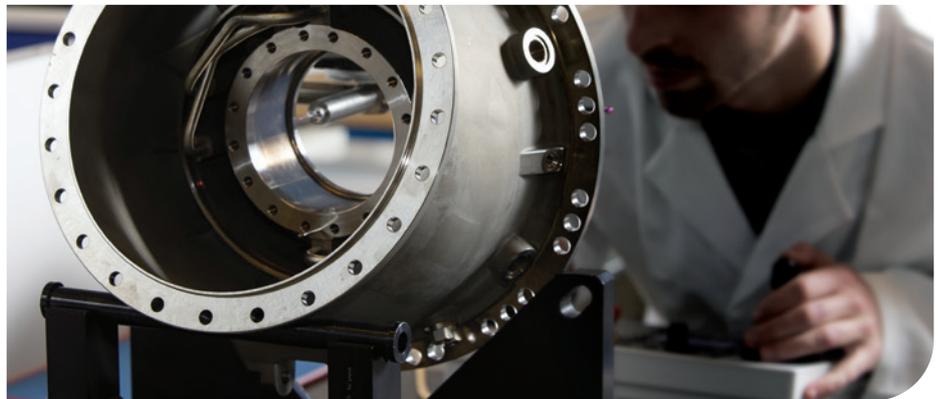
---

## 2.6. Trading Securities

We must not disclose any information that could influence the value of ArianeGroup shareholders' stock price before it has been publically communicated.

In line with laws relating to insider trading, we must not buy or sell the stock of any company while in possession of inside or privileged information about that company obtained in the course of our work. In addition, we must not disclose any inside or privileged information to anyone, including co-workers, friends, and family.

---



---

# 3. ENGAGING IN RESPONSIBLE BUSINESS PRACTICES

**Upholding values of integrity, honesty and transparency, ArianeGroup aims to be an unfailingly trustworthy partner for all its customers and stakeholders. We are committed to conducting our business in a highly responsible way, in compliance with applicable laws and regulations in all countries where we do business as well as internal rules and procedures.**

## 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. Committing 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 in the interest of our customers and all our stakeholders.

We must comply with all quality-control standards and procedures that govern our responsibilities. Product quality and safety depends 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 remedy any quality and safety issue, and then to propose appropriate 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 our relationships with them to achieve goals of mutual benefit. This means promoting the exchange of best practices and sharing synergies where relevant.

The Procurement department 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.

---

# ENGAGING IN RESPONSIBLE BUSINESS PRACTICES

## 3.4. Zero tolerance of corruption

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

We must never engage in any kind of corrupt practice or hire someone else to do anything that we cannot ethically or legally do ourselves.

We must 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 gaining an improper advantage. Likewise, we must never solicit or accept a bribe or kickback from a public official or private body.

In this spirit, gifts, invitations, and hospitality of any kind, given to or received from customers, suppliers, and other partners, must reflect a normal business relations courtesy and must not influence, or give the appearance of influencing, any business decision.

We should always refer to our internal *Code of Conduct*, which specifies how we should behave in concrete situations in order to detect and prevent corrupt practices. We may also seek guidance from the ArianeGroup Ethics & Compliance department or the Compliance Officer in subsidiaries.

---

## 3.5. Avoiding 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 shall always seek to act with loyalty and 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 shall disclose it to our manager and to the ArianeGroup Ethics & Compliance department or the Compliance Officer in subsidiaries.

---

## 3.6. Competing and operating 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. We operate in good faith at all times, and rule out any fraudulent behavior from the way we do business.

---



# ENGAGING IN RESPONSIBLE BUSINESS PRACTICES

## 3.7. Combatting money laundering

We are committed to conducting business only with reputable customers who are involved in legitimate business activities and whose funds are, to our knowledge, derived from legitimate sources.

---

## 3.9. Ensuring fair relations with shareholders

We maintain an open dialogue with our shareholders and exchange, in a spirit of transparency, information on our activities and objectives, in compliance with ArianeGroup governance principles and confidentiality rules.

---

## 3.10. Cooperating with authorities

We cooperate with legitimate authorities. We shall answer with correct, accurate and complete information to any request from a public official that relates to an inquiry or investigation.

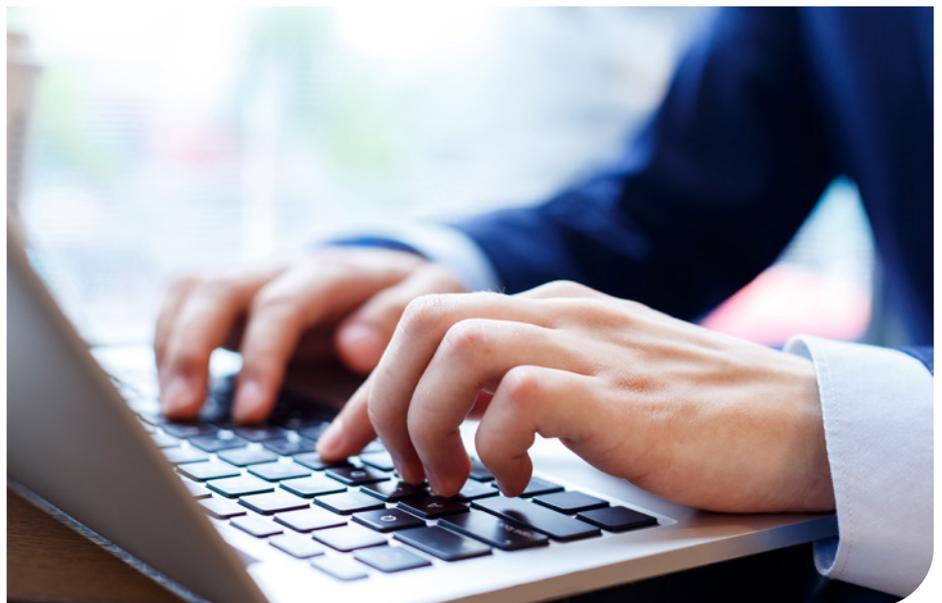
---

## 3.8. 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 crucial that we attentively respect Export Control processes in order to comply with all applicable regulations.

In case of doubt or questions, we seek guidance from the ArianeGroup Export Control department or the person responsible for Export Control in subsidiaries.

---



# 4. WORKING TOWARDS SUSTAINABILITY

**We consider Ethics and Corporate Social Responsibility as key elements of business excellence. We are committed to integrating these principles in our strategy in order to foster sustainable growth and make ArianeGroup an increasingly attractive place to work and a trusted partner for all stakeholders.**

## 4.1. Establishing responsible business standards at every level

We commit to developing policies and processes that foster Ethics and Corporate Social Responsibility in our corporate business practices and in our relations with all our stakeholders. We recognize that reaching the standards established in this Charter is a dynamic process and we commit to continuously improving our operations.

We also promote the adoption of standards of Ethics and Corporate Social Responsibility in the extended enterprise and even more widely, by working along our peers and with our stakeholders.

---

## 4.2. Conducting responsible sourcing

By engaging in responsible sourcing, we aim to achieve long-term relationships with best-in-class suppliers that embrace the highest integrity standards.

We expect our suppliers to understand, share, and adhere to our business ethics standards and comply with our *Supplier Ethics Charter*.

We are committed to exercising due diligence on our supply chain, in line with applicable laws and international guidelines.

---



# WORKING TOWARDS SUSTAINABILITY

## 4.3. Developing our local communities

We are committed to improving the quality of life in the communities and territories where we conduct our activities, and a great deal of our daily tasks focus on creating shared value. In addition, charitable contributions to public-interest or private organizations may be permitted if not in contravention of local law or internal Ethics & Compliance standards.

---

## 4.4. 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. Eco-efficiency aims at maximizing the benefits of the products and services we provide to our customers and other stakeholders, while minimizing the environmental impact of these products throughout their lifecycle. We seek to 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 all applicable environmental laws and regulations wherever we do business. Individually, we commit to reporting any risk situation or incident that could have a damaging environmental impact to our manager or the person in charge of Health, Safety & Environment.

---

## 4.5. Building a better tomorrow

As a leading actor in the space sector, we recognize our responsibility for building long-term value together with our stakeholders, inspiring people, and making technology evolve to make Earth a better place to live.

---



#spaceenablers

[www.ariane.group](http://www.ariane.group)



**ARIANEGROUP**

HEADQUARTERS:  
51-61 ROUTE DE VERNEUIL  
78131 LES MUREAUX - FRANCE

**CONTACT INFORMATION**

**Ethics and Compliance department**  
Phone: +33 (0)1 39 06 12 34  
[ethics@ariane.group](mailto:ethics@ariane.group)

**RAISING AN ALERT:**

<https://ag.1signal.net>

D-0007 - Issue 03 - March 2019  
Date of publication: April 2023