



TELESPAZIO FRANCE

CODE OF ETHICS TELESPAZIO FRANCE

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CODE OF ETHICS TELESPAZIO FRANCE

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PRÉFACE

Dear Colleagues,

As you know, our ambition is to pursue the growth of our Company so as to become a key actor in the field of Aerospace in France. This development is based on the respect of our Company values. This aim, challenging for each of us, naturally increases the risk profile of our Company, particularly in a period when our field undergoes a deep change (new technologies, new clients, funding arrangements...). Regarding this context, our rules should help us to strictly apply the good behaviours that protect us.

Telespazio France has in its DNA the transparency, responsibility and reliability. These three aspects should be included in our daily practice. This excludes postures and declarations of intent and imposes us to settle these values into and for the acts. We should, therefore adopt at any time in any circumstance, a perfect and transparent behaviour, not only in accordance with the applicable regulations but also beyond, related to the highest ethical standards described herein.

Built over time, our status of reliable partner among our clients, both private and public, depends directly on the integrity of each of us in our daily practice. Since, as Warren Buffett said, « *It takes twenty years to build a reputation and five minutes to ruin it. If you think about that, you will do things differently* »

The respect of values defined by this Code relies on the responsibility of each of us since we build, develop and protect Telespazio France all together.

I count on you, as I do, to show no tolerance in case of failure to comply with this Code and or who may spread it among stakeholders we worked with and for.

Jean-Marc GARDIN
Chief Executive of Telespazio France
Vice-president of Telespazio Group

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INTRODUCTION

What is the aim of this Code ?

In compliance with the global vision of Telespazio Group hold by both companies Leonardo and Thales, the management and activities of Telespazio France strictly follow absolute respect of laws and regulations in force as well as the application of the most rigorous norms of professionalism and ethics.

In order to improve its public and private customers' satisfaction, to develop professional fulfilment skills of each of its employees and to guarantee the respect of applicable regulations, Telespazio France commits that the management of the Company will be carried out with loyalty, integrity, equality and transparency.

The following Code aims at guiding Telespazio France partners on their behaviour and decision-making. It recommends the behaviour rules to adopt and proposes these rules illustrations concerning all the situations that might be encountered. The examples of behaviour to adopt or to avoid are non-exhaustif and might sometimes seem obvious. However, it is important to remind them as they show the values of our society and the general idea of this Code requirements. Thus, in case there is a situation that has not been previously forecasted in this Code but might break the applicable regulations of society, we recommend you to behave the closest to what these rules determine, if in doubt, you should put in touch with :

- (i) Your manager ; or
- (ii) Other identified contacts of the concerned section

Who is this Code for ?

This Code is applicable to all the staff members, agents and external partners.

This Code is also contractually applicable to all co-contracting parties of Telespazio France including its subcontractors, partners and clients.



Warning device

We should all be actors of risks prevention and guarantee the ethics of our Company. A professional warning device is therefore set up within Telespazio France, offering the opportunity to every partner or co-contracting party to report any event (no matter who the concerned person might be), that is against the business ethics or that breaks the applicable regulations and principles or rules established herein.

For all staff members of Telespazio France, this report could be provided, at your choice, to your manager or directly to the Ethics and Compliance Manager of the Company :

Claire DUMONTELLE
Ethics and Compliance manager
ethique-conformite@telespazio.com

For every co-contracting party of Telespazio France, this report could be directly provided to the Ethics and Compliance Manager of Telespazio France whose contact details appear hereinabove.

The Ethics and Compliance Manager shall respect a reinforced duty of confidentiality. The identity of the warning provider will be kept strictly confidential and no sanction will be hold against any employee who might have triggered the warning alert in good faith.

The Ethics and Compliance Manager will ensure to handle the alert accurately, by collecting facts, data and information provided in an objective way, being directly associated with forbidden behaviour during the alert.

After examining the alert, collecting the requested data and after informing the person concerned by the alert, the Ethical and Compliance Manager will determine whether the provided data belong to the internet warning scope or not and will take the necessary measures to this alert (more detailed control or others). According to the established events, disciplinary measures shall be set up or the concerned authorities shall be applied.

The person concerned by the alert will be informed within a reasonable timeframe, not exceeding one month, except if silence should be kept regarding this information in terms of provisional measures or if there is any risk that evidences might be destroyed. In this case, the person concerned by the alert will be informed once the risk will be put aside, without providing the identity of the alert provider.

HUMAN RESOURCES

Good Management Practices

The development of our talent is at the heart of Telespazio France values and the Manager is known to play a key role on the achievement of this aim.

The Manager is the cog leading to the conception and implementation of the Company's strategy, the one who should provide sense to his strategic approach, to pilot the activity and projects, to know how to decide, to supervise his colleagues by encouraging equality, diversity and professional evolution of the members of his team, to develop collective intelligence and cooperation, to follow change, to represent the Company among external stakeholders and manage both difficult situations and crises..



EXAMPLES OF BEHAVIOUR TO ADOPT

- To translate and claim ownership of the Company's strategy, directions and objectives ;
- To show exemplariness ;
- To base decisions on a structured thoughts;
- To organise and coordinate the teams' work taking into account each member's skills ;
- To ensure colleagues' motivation taking into account all the profiles' diversity ;
- To promote the respect of the Company's processes, mostly the good practices of this Code within its team and to ensure a respectful cooperation between all the members of Telespazio France.



EXAMPLES DE BEHAVIOURS TO AVOID

- To ignore conflicts with or between the team's members ;
- To set up a detrimental competition between the members of a same team ;
- To wait for the encountered difficulties to be solved by themselves or keep quiet about a situation for fear of worsening things ;
- To let a colleague isolate himself or to frequently ignore the requests of his team's members.;
- To keep quiet about positive feedback and improving approaches of his team's members.

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Any question ?

- Conflicts emerge with or within my teams, What should I do ?**

Agreement and cooperation of the members of a same team are key not only for our colleagues' professional fulfilment but also for the team's efficiency. Once a contentious situation has been declared, it is essential to report it to the Human Resources Direction that will help you to manage the situation and find harmony back among the team.
- I meet difficulties with a member of my team and I do not know how to behave. Who am I supposed to get in touch with ?**

Telespazio France encourages the Manager to show management courage, but this should not be considered as a motivation to handle difficulties on hiw own. All the difficulties encountered within your team should be reported to your own Manager or, if need it, to your own Human Resources Manager.

In order to foresee difficulties within teams and to know the good practices to adopt as a manager, the Human Resources Direction also provides you with aimed training sessions. You should request them, upon agreement with the person in charge of training, if you feel the need.



Contacts

- Human Resources Manager





For more information

- [Management manual of Telespazio France](#)

Health and safety

Telespazio France commits to preserve all its staff members' health and safety through the settlement of preventive actions, proactivity and full respect of the applicable regulations. This commitment also implies the need of existing risks consciousness and the promotion of responsible behaviour from all the colleagues within their professional tasks, any time, everywhere, no matter what status they have (hierarchical position or years of experience).

|  <p align="center">EXAMPLES OF BEHAVIOUR TO ADOPT</p> | <p align="center">EXAMPLES OF BEHAVIOUR TO AVOID</p>  |
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| <ul style="list-style-type: none"> • To fully respect all the recommendations in terms of health and safety released by Telespazio France (see the documents appearing hereinafter « for further information ») ; • To use all the equipments of personal protection adapted to the place and accomplished task ;; • To always show oneself cautious so as to ensure its own health and safety as well as others ; • To report to your Manager or to your Human Resources Manager any close danger or any situation that might trigger a danger on its health, safety or on the others. | <ul style="list-style-type: none"> • To neglect recommendations and safety rules released by Telespazio France ; • To be less cautious and put oneself or its colleagues in danger ; • To keep quiet regarding a situation that might threaten our health, safety or the professional integrity of oneself or any of its colleagues. |



Any question ?

- **Where to find the rules and procedures applied by Telespazio France in order to protect the health and safety of the Company's staff ?**
All the protection measures regarding health and safety of the Company's staff are described in the various internal regulations belonging to each of Telespazio France site, that all staff's members commit to respect by signing its employment contract. These measures could be completed by the « Document Unique d'Evaluation des

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Risques Professionnels (DUERP) and the instructions displayed in all Telespazio sites or released in writing to all its partners.

- **What to do if I encounter a dangerous situation for others ?**
Every dangerous or potentially dangerous situation shall be immediately reported to your Manager and to the Human Resources Direction. In case of imminent danger to one's life or physical integrity, this shall be immediately reported, first of all, to the concerned Emergency Department.

- **What to do if I fear that the implementing conditions of my activity put my health or safety in danger ?**
Any dangerous or potentially dangerous situation for your physical or mental health shall be immediately reported to to your Manager and to the Human Resources Direction.



Contacts

- Responsible for Hygiene Safety Environnement : tpzf.hse@telespazio.com;
- Any member of the Human Resources Direction (DRH) ;
- Committee of Health, Safety and Working Conditions (CSSCT) ;
- Occupational Health.






For further information

- Internal regulations of each site;
- *Document Unique d'Evaluation des Risques Professionnels (DUERP)* ; Unique Document of Professional Risks Assessment
Instructions displayed or released in writing in all Telespazio sites

Non-discrimination

Telespazio France considers that its employees' diversity is a societal need and an essential asset, this is why the Company commits to guarantee equal opportunities in terms of recruitment, acknowledgment and professional evolution of all its staff's members. On this basis, not only within its recruitment procedure and professional evolution but also regarding the relationships with its employees, Telespazio France does not allow any kind of discrimination. The recruitment or staff members' promotion are only based on justified and objective criteria by avoiding all kind of special treatment, regardless its gender identity, age, origin, handicap, sexual orientation, political, religious or trade union convictions or any other feature.

|  <p align="center">EXAMPLES OF BEHAVIOUR TO ADOPT</p> |  <p align="center">EXAMPLES OF BEHAVIOUR TO AVOID</p>  |
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| <ul style="list-style-type: none"> • To adopt a respectful and non-discriminatory behaviour towards all the Company's commercial partners; • As a manager, to question oneself regularly about the reasons of one's choices leading to the professional evolutions of its own team ; • To question oneself regularly and carry on being aware of the discrimination issue ; • As a manager, to immediately sanction any discriminatory word or behaviour of one's staff member ; • To report to one's manager or to the Human Resources Direction any discriminatory behaviour towards or by any employee of the Company. | <ul style="list-style-type: none"> • To encourage directly or indirectly or to do nothing about discriminatory behaviour or disrespectful or discriminatory words towards any person of the Company (partners, suppliers prestataires, commercial employees of the Company) ; • To be silent about any behaviour that might affect one's self-confidence or others' professional fulfilment especially such as a discriminatory conduct, gestures or words ; • To encourage the recruitment or professional evolution of a colleague to the detriment of another one for discriminatory reasons ; • To put a candidate's CV for any reason not related to his professional skills. |

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Any question ?

- **On a daily basis, my team's manager often make jokes regarding my sexual orientation. When I point this out to him, he answers « It's humour ! ». It is daily annoying, and I am afraid of reporting it and having thus negative repercussions on my career. What should I do ?**

No matter the situation or the hierarchical level, Telespazio France does not tolerate, under any circumstances, that a colleague shall be a victim of discrimination, regarding daily behaviour of colleagues who shall always preserve and show mutual respect or concerning the professional evolution of our colleagues that only depends on objective criteria. Telespazio France strictly make sure that reporting such a situation will never be punished with a sanction, official or not of the victim of such a behaviour.

This type of situation shall be immediately reported to your Human Resources Manager so as to carry out an immediate deep analysis adapted to the situation and therefore sanctions will be applied to the concerned colleague. Being aware of the inherent difficulty of this type of report, your Human Resources Manager will make sure to protect the data confidentiality that you will disclose within your exchanges.



Contacts

- Your Manager ;
- Human Resources Direction



For further information

- Internal regulations of each site
- Agreement on equality between men and women

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Respect of working relationships

Telespazio France expect its employees to adopt a respectful behaviour, under any circumstance contributing to the Company's harmony and to the development to the collective intelligence.

Telespazio France shows particularly no tolerance to moral or sexual harassment.

Harassment is a crime, punished by the penal code that consists in repeated conducts that might trigger, for the person who undergoes them, a damage of his working conditions possibly leading to :

- A violation of its rights and dignity,
- An alteration of its physical or mental health,
- A threat to its professional evolution.



Sexual harassment is characterised by the fact of imposing to somebody, repeatedly, any sexual or sexist word or behaviour that :

- To cause damage to its dignity due to their degrading or humiliating feature or
- To create against him any intimidating, hostile or offensive situation.

It is considered as sexual harassment any way of serious pressure (even non-recurring) with the real or seeming aim of to achieve a sexual act, in aid of the perpetrator or any third party.

In order to make the report and management of harassment situations easier, three harassment representatives within Telespazio France are in charge of collecting the reports of sexual or moral harassment and support people reporting this kind of harassment :

- A representative of the Company;
- A representative of CSE Toulouse Métropole ;
- A representative of CSE Kourou.

|  <p align="center">EXAMPLES OF BEHAVIOUR TO ADOPT</p> |  <p align="center">EXAMPLES OF BEHAVIOUR TO AVOID</p> |
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| <ul style="list-style-type: none"> • To treat, under any circumstances, its partners and colleagues with respect ; • To report immediately any behaviour that might affect the professional well-being of our Company's employees, particularly regarding situations of moral or sexual harassment (see definition below) ; • To encourage any victim of moral or sexual harassment to report this situation to his manager or to his Human Resources Manager ; • To provide his team regularly with the contact details of harassment representatives. | <ul style="list-style-type: none"> • To produce, or to contribute to the emergence of any situation leading to humiliating or intimidating a person or even to make her feel uncomfortable or to get her to make a mistake ; • To encourage one's physical or social isolation; • To use words (oral or written...) or to adopt any undesirable or inappropriate behaviour with sexual connotation including particularly physical contact, emails, insistent gaze, comments, invitations or requests ; • To ignore or let people do or tell in front of you any behaviour that might be considered as moral or sexual harassment towards a colleague of Telespazio France. |

 **Any question ?**

- **I am about to become a father but my team has been facing a huge workload lately. I would like to enjoy my paternity leave but I would not want my absence to cause a delay on the project or an overload of work to my colleagues.**
The paternity leave is a right and it means a key moment in our colleagues' private life that should not, in any case, to have an impact on the professional evolution of the person concerned. Your manager should forecast your upcoming paternity leave and it is forbidden to explicitly or implicitly encourage fathers to be to give up on their paternity leave. In case of giving up on this right, this choice should never be motivated by a feeling of guiltiness towards its colleagues or by fear of the impact this might cause on one's professional evolution.
- **At the Company's cafeteria, some colleagues make jokes implying that my recent promotion is a promotion« by sleeping your way to the top ». I am delighted with my**

colleagues' friendliness, but sometimes this makes me feel uncomfortable. What should I do ?

Telespazio France grants great importance to its staff's well-being by ensuring an harmony among all its employees. Nevertheless, each one's well-being also depends on mutual respect imposed anywhere, anytime. This is why Telespazio France encourages you to report to the concerned person, at the same moment or afterwards, the discomfort you went through.

In the case it might be hard for you to report alone to the concerned person, your Manager or Human Resourcer Manager can support you.

Nevertheless, the fact to repeatedly address to somebody words against his dignity since they are degrading or humiliating is considered as a harassment situation and such a behaviour shall be immediately to your Manager, to your harassment representative or to your Human Resources Manager.

- **I have realised that during meetings, my colleague was systematically interrupted or refuted whereas her opinions seem purposeful, well-built and smart. What could I do ?**

According to the instructions in favour of efficient meetings, the organiser of each of them should ensure a fair distribution of each participant's speaking time, regardless their hierarchical position, their gender, age, origin or any other discriminatory criteria. Nevertheless, everyone should respect and recall the exigences for respect within Telespazio France. On this basis, Telespazio France encourages each of its employees, who witnesses any degrading, humiliating or unfair situation regarding one of his colleagues to report it immediately or afterwards to the person concerned of this behaviour.

In the case it might be hard for you to report alone to the concerned person, your Manager or Human Resourcer Manager can support you.

Nevertheless, the fact to repeatedly address to somebody words against his dignity since they are degrading or humiliating is considered as a harassment situation and such a behaviour shall be immediately to your Manager, to your harassment representative or to your Human Resources Manager.

- **My Manager has praised me several times regarding my physical appearance and addressed me sexually offensive remarks. I fear to reject her or report her behaviour to the Human Resources Manager and thus be negatively impacted on my professional evolution.**

Telespazio France shows no tolerance regarding harassment, particularly regarding sexual harassment. The well-being of each of its employees remains a priority for Telespazio France, mostly regarding its psychological repercussions that such a situation caused on the victim, both professionally and personally speaking. However, only reported situations can be handled by Telespazio France. This is why, Telespazio France encourages you, either as a witness or victim, to report such a situation to the harassment representative or to your

Human Resources Manager who will do everything to ensure a kindly exchange, adapted to each situation and confidential regarding the people concerned.



Contacts

- Harassment Representative ;
- Human Resources Manager.



For further information



- Internal regulations of each site
- Agreement on equality between men and women

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Respect of Labour Law

Telespazio France grants great importance to the quality of social dialogue inside the Company, both in a local level (establishments) and national level (company) and endeavours to associate different representative authorities of the staff in the Company's life, while respecting their mandates.

Telespazio France respects its employees' collective representation and its trade union freedom. The Company does not only carry out mandatory negotiations each year but also negotiations regarding collective agreements in order to build a strong social base.

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| <ul style="list-style-type: none"> • As a staff representative you should declare your commission hours ; • As a member of Telespazio France staff, you should contact a staff representative for any question or piece of advice ; • As a member of Telespazio France staff, you should become aware of meeting minutes of CSE meetings that you receive ; • As a manager, treat the members of the staff's representative authorities (IRP) like the rest of the members of the team. | <ul style="list-style-type: none"> • To reproach a colleague/member of the team his absence regarding commission or union meetings hours ; • To make unkind remarks concerning his status to a staff representative. |



Any question ?

- **I am a manager and one of the members of my team tells me at the last minute that he shall attend a commission meeting regarding his status of staff representative. What should I do ?**

Each member of the staff's representative authorities can attend a delegation meeting anytime, subject to declare his commission hours, and a manager is not allowed to limit this right. The manager should organise his team so as to foresee the commission hours of his colleague.

- **Within my status as a member of the staff's representative authorities, I am in conflict with my Manager regarding a social topic. I fear this conflict to have negative repercussions on my annual assessment made by my Manager.**

To treat a member of the team differently just regarding his commitment to a staff's representative commission is discriminatory. A manager is not allowed to curb the professional evolution of a member of his team regarding his commitment to the staff's representative authorities, subject to a disciplinary sanction.

The report of such a discrimination to your Human Resources Manager is strongly encouraged by Telespazio France.



Contacts

- Human Resources Manager




Pour plus d'informations

- Internal regulations of each site
- Agreement on Labour Law
- Agreement on CSE functioning

Human Rights

Telespazio France commits to defend human dignity and the full and unconditional respect of Human Rights, no matter where their activities take place or the ones of its subcontractors. This mostly concerns :

- (i) The fight against children labour,
- (ii) The fight against any kind of forced labour,
- (iii) Freedom of speech,
- (iv) The effective practice of the right of association

| <p align="center">EXAMPLES OF BEHAVIOUR TO ADOPT</p> | <p align="center">EXAMPLES OF BEHAVIOUR TO AVOID</p>  |
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| <ul style="list-style-type: none"> • Always wonder who we formalise an agreement with ; • To respect processes and instructions concerning screening and control of all commercial partners of Telespazio France including suppliers, subcontractors, partners and clients ; • To treat each person with respect and dignity ; • To report any situation that might violate Human Rights and any suspicion or sentence of a current or upcoming commercial partner in this field ; • In case a person is under imminent danger, you should immediately report this situation to the Emergency Department concerned and then inform the Establishment Direction concerned. | <ul style="list-style-type: none"> • To keep silent about a situation that is against human dignity ; • To prioritise a commercial advantage against of the absolute respect of Human Rights. |

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- **While carrying out a project, I notice that one of our subcontractors makes their employees work in a site presenting health risks. What should I do ?**

Each of Telespazio France commercial partners shall commit to guarantee human dignity and Human Rights. Any situation being against Human Rights shall be immediately reported to his Manager and to the Ethics and Compliance Manager who will recommend the break up of commercial relationships with the concerned subcontractor.

In case of imminent danger for one or several people, you should immediately warn the local Emergency Department concerned and then inform the appropriate Establishment Direction.



Contacts

- Human Resources Manager ;
- Ethics and Compliance Manager: ethique-conformite@telespazio.com.



For further information

- Internal regulations of each site

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BUSINESS ETHICS

Anti-corruption struggle

Telespazio France grants particular attention to fighting against corruption and influence peddling. The increase of national and international regulations that aim at fighting against corruption strengthen the risks of sanctions to which Telespazio France is confronted within the scope of its activities. The Company's sentence comes along with notoriety and financial risks that might seriously compromise the Company's activities, the risk of civil or penal sentences of the Company, its leaders, but also any employee no matter his position or hierarchical status.

Due to the fact corruption risks often seem to be remote and that it is not easy to make the distinction between a pledge of kindness and a corruption attempt, it is essential to be extremely vigilant in the field. In this way, each of the Company members, no matter their hierarchical level, permanent or occasional, shall respect the directives provided by this Code in order to Protect the Company and its staff against any suspicion and, a fortiori all sentence, in accordance with corruption or influence peddling.



Reminder about corruption and influence peddling

- **What is corruption ?**
Corruption is the fact to offer, promise or provide an unwarranted advantage, in a direct or indirect way, to someone à une personne, to its own profit or to the profit of a third party with the aim that this person behaves or does not behave regarding the execution of his tasks so as to obtain or maintain or an unwarranted advantage. However, corruption is also the fact of accepting or receiving such an unwarranted advantage.
- **What is peddling influence ?**
LPeddling influence is the fact to propose, offer, in a direct or indirect way, remuneration to anyone who assures or confirms being able to influence directly or indirectly a final decision with the aim to obtain an unwarranted advantage. But it also means to propose or accept to take advantage of such a real or presumed influence to receive remuneration or an unwarranted advantage.
- **What are the risks ?**
The consequences of an act of corruption or peddling influence are not only supported by the Company. Actually, the person who was found guilty of corruption, both the corrupter and corrupted, exposes himself to a 10 year prison sentence and a fine reaching 1 000 0000 €.

To provide courtesy or hospitality in the form of gifts or invitations, is a common practice in business life, differing according to countries and cultures of third parties concerned. A gift or invitation offered with the best intentions might seem ethical and natural in a country but as a corruption act according

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to another country's Law. All kindness pledges between commercial partners are not automatically a corruption act, each situation shall be analysed individually according to the nature of the gift or invitation received or offered as well as the context where they have been offered or received. Considering the variety of situations, these directives aim at limiting the risks despite the situations variety.

GIFTS AND INVITATIONS POLICY

Gifts and invitations, received or offered by Telespazio, shall respect the following conditions :

1. First condition : a legitimate purpose of the gift

- (i) They shall be offered and received in a professional context only ;
- (ii) They shall not be offered with the objectif, stated or not, of obtaining an unwarranted advantage or to influence the ongoing business decision ;
- (iii) They shall not cause any situation of conflict of interest for the beneficiary characterised by an interference between its private interests and the Company ones that might influence the accomplishment of his missions ;
- (iv) They shall never be received or offered while consulting or negotiating with a third party ;
- (v) They shall not be received by a close person ;
- (vi) They shall have never been directly or indirectly requested by the beneficiary.

Any gift received or offered that does not respect the conditions above shall be subject to a previous autorisation from your Manager or the Ethics and Compliance Manager.

2. Second condition : a reasonable gift

- (i) Its frequency is limited to just one gift or one invitation by a third party and per year ; and
- (ii) Its real or estimated amount shall not exceed fifty (50) Euro.

Any gift received or offered that does not respect the conditions above shall be subject to a previous autorisation from your Manager or the Ethics and Compliance Manager.

3. Third condition : a gift received or offered in full transparency

Any gift or invitation received or offered, excepting advertising products generally accepted, shall Tout cadeau ou invitation reçu ou offert, à l'exception des produits publicitaires généralement admis, shall be reported to your Manager by completing the following form :



The activities of Telespazio France request to actively collaborate with several third parties. However, any potential or existing collaboration with a third party shall be preceded by an attentive control (due diligence, ou « prior control ») so as to ensure that afin de s'assurer que les partenaires Telespazio



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France commercial partners are reliable third parties, providing rules of anti-corruption and associated procedures at least equivalent to ours.

The prior control of suppliers and subcontractors shall be done in accordance with Telespazio France Procurement Process. This one is applied before any order and while the offer is still active, but also once a year for all our suppliers and subcontractors who are already referenced. This allows us to control the financial health of our suppliers and subcontractors but also to verify that no legal proceeding is ongoing against the Company or its leader, and no sentence has been announced against them.

Telespazio France has its heart set on supporting directly with no compensation an activity or act presenting a general interest. However, sponsorship or patronage operations of the Company shall be previously subject to approval from the Ethics and Compliance Manager and can only be granted in the following fields :

- (i) Health,
- (ii) Education,
- (iii) Scientific and technological research,
- (iv) Culture,
- (v) Solidarity,
- (vi) Environnement.

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|  <p>EXEMPLES OF BEHAVIOUR TO ADOPT</p> <ul style="list-style-type: none"> • To declare any gift, invitation or advantage offered or promised to a commercial partner of Telespazio France ; • To make sure to obtain the prior autorisation from your Manager and from your et Ethics and Compliance Manager before accepting or offering a present which do not strictly respect the conditions of the gifts or invitation policy ; • To refuse and report any request from a third party who proposes to use his influence in order to obtain, directly or indirectly, from a public or private or to protect any commercial agreement, |  <p>EXEMPLES OF BEHAVIOUR TO AVOID</p> <ul style="list-style-type: none"> • To offer, accept, promis an advantage, or make onself promise financial or not, directly or through a third party, to anyone acting within a public or private entity, with the objective of obtaining or protecting a commercial advantage or to accelerate or make an administrative procedure easier ; • To accept or receive a present qhose value exceeds the one foreseen in the gift policy ; • To offer a gift or an invitation to a commercial partner of the Company, current or potential, whose value exceeds the one foessen in the gift policy ; |
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commercial advantage or to make an administrative procedure easier. ;

- To report any unusual request and particularly the insistence of a client to turn to a unique service provider or supplier, the request to receive cash payment, a payment to be done to a third party or onto an anonymous bank account, repetitive or disproportionate invitation requests ;
- To contact the Direction Ethical and Compliance Department in case of doubt ;
- To subject any commercial partner to a previous appropriate control of his background, reputation, according to an internal process in force ;
- To highlight the risks of violating business ethics such as corruption, conflict of interests...(non-identified commercial interests, political relationships, professional network, reputation etc.) ;
- To report any newly identified risk ;
- To remain vigilant all through the commercial relationship ;
- To formalise any commercial relationship through an agreement or consent that secures Telespazio France interests and that imposes the co-contracting party to respect the applicable regulations regarding the fight against anti-corruption ;
- To make sure to have obtained the previous agreement from the Ethics and Compliance Manager before proposing or accepting sponsorship or patronage actions.

- Not to mention any gift, invitation or other advantage received from any commercial partner of Telespazio France, current or potential ;
- To tell oneself that the risk is minimal compared to what the commercial opportunity represents ;
- To tie the Company upon a third party without performing a previous control ;
- To think that a lasting business relationship with a third party is enough to show reliability and trust ;
- To Consider that only the Legal and Compliance Department is concerned by these subjects ;
- To keep quiet about a negligence carried out by a third party or any other element he is aware of, that might question the trust Telespazio France might grant to this third party.
- To propose or accept to perform actions of sponsorship or patronage towards an entity or person who maintains or performs, directly or indirectly, political activities;
- To propose or accept to perform actions of sponsorship or patronage with the only aim of obtaining an unwarranted advantage for himself, for a third party or for the Company.

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Any question ?

- **During a day of negociation at a service provider's site, he invites us to have lunch to a close restaurant. Do I have the right to accept his invitation ?**

The first step is to question about the context of this invitation. If negociations are still ongoing, this invitation might affect your decision, you should refuse politely. This invitation can only be accepted if negociations are already over. The second step is to question about the amount that this invitation represents. If the restaurant provides you with this information, you should make sure that the invitation remains under the limit defined by the Company. If the estimated amount of the lunch is above the maximum permitted amount, this invitation cannot be accepted without your Manager's autorisation. If you have accepted the service provider's invitationn you are responsible for declare this invitation according to the procedure of the policy herein.

- **The son of one of our clients is looking for an internship in the Aerospace field and my client asks me if Telespazio France has an internship offer that might suit him. Can I accept ?**

Although this practice might be inoffensive, the fact to offer such an advtange to a family member of one of our clients might be understood as an unwarranted advantage provided to the client so as to influence upcoming commercial relationships. Even if this is performed in good faith, without expecting any compensation, it represents a risk of bad interpretation. It it thus possible to include the son of our client into the recruitment process based on non-discriminant conditions, but it is forbidden to favour him among other candidates.

- **To carry out a project abroad, we are waiting for a specific licence whose obtention deadline delays the project. One of the members of the competent administration proposes us to pay a higher amount to accelerate the administrative process. Can I accept ?**

The fact to remunerate, directly or indirectly, in an undue way, a public agent for performing administrative paperwork, that should have been obtained through normal legal ways is called a « facilitation payment ». This is considered as a corruption act and is strcitty forbidden by this policy but also by the French Law. You should refuse politely and immediately report this request to you Manager and to the Ethics and Compliance Department.

- **While negotiating an agreement with one ofTelespazio France clients, their CEO informs us that his daughter is looking for a block release training at a company specialised in the Aerospace field as Telespazio France. Can I send her CV to the Human Resources Department ?**

Of course your can give her CV to the Human Resources Department that can take it into account in case they will be looking for a similar profile.
Nevertheless,

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- (i) The recruitment policy is based on objective criteria and equal opportunities and this CV cannot, under no circumstances, be favoured for other reasons than the **harmony** between qualities and skills of the concerned person and the searched profile ;
- (ii) It is forbidden to promise or insinuate that the CV of his daughter will be favoured with the objective of realising, favourising or making easier ongoing negotiations with the client.
- (iii) This action shall be declared to the Ethics and Compliance Manager.

- **Why to spend time to search about the commercial partner if the agreement already engages him to respect the applicable laws ?** Signing an agreement where the parties commit to respect the regulations to fight against anti-corruption is a requested condition but not enough. The French Law imposes us, thus, to carry out a prior investigation (due diligence). Otherwise the acts of our co-contracting party might engage the Company responsibility.

- **Concerning a public call of tender, we have identified the best supplier from a technical point of view but some rumours say he often pays backhanders in order to accelerate customs control. What should I do ?**

Any commercial relationship shall precede a prior control of the future commercial partner. Such rumours constitute an element of risk that should be reported and it triggers a detailed control. You should therefore provide the Procurement Department with all the information you know concerning this subcontractor, including simple rumours. The commercial relationship will only be accepted after the agreement of the Procurement Department and the Ethics and Compliance Department.

Afterwards, all new relevant information shall be immediately reported.

- **One of our clients let us know that our offer would be selected if we supported an association he leads and whose main mission is to support a local political movement. What should I do ?**

The support to an association shall be performed with no compensation and, under any circumstance, shall be associated with the obtention of an agreement with a client or with any commercial advantage. This might cause serious sanctions against Telespazio France (as well as on an individual basis) and seriously impact its reputation. In such a situation, this proposal shall be reported to the Legal and Compliance Department and explain to the client the Company policy regarding this aspect, justifying a refusal.



Contacts

- Ethics and Compliance Manager : ethique-conformite@telespazio.com;
- Supply Chain Department ;
- Procurement Department.



For further information

- Internal regulations of each site



Conflict of interests

Telespazio France recognises and accepts the right of all its employees to perform investments or activities not related to their missions in the Company, on condition of being legal activities and compatible with contractual obligations, particularly of loyalty, resulting from their employment contract.

Nevertheless, it is essential that each employee behaves in a loyal and impartial way without their individual rights to be against the interests of Telespazio France.

The conflict of interests refers to any interference situation between his personal interests and those of their family members and those of Telespazio France that might influence the exercise of his missions to the detriment of the Company. This is, particularly the case when an employee favours commercial relationships with a company where himself or a member of his family has shares.

Any conflict of interests or any will to carry out another job at the same time and particularly through the creation of a company shall be declared to the Human Resources Department.

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|  <p>EXAMPLES OF BEHAVIOUR TO ADOPT</p> <ul style="list-style-type: none"> • To preserve, in every circumstance, an impartial and objective decision-making, prioritising the Company’s interest over the personal and family ones ; • To report any extra professional activity to the Human Resources Department ; • To report immediately any personal or professional situation that might constitute a conflict of interests. |  <p>EXAMPLES OF BEHAVIOUR TO AVOID</p> <ul style="list-style-type: none"> • To keep quiet about any existant or potential situation that might be or become a conflict of interests ; • Regarding his missions, to take any decision with the only objective of favouring his personal or family interests; • To influence the recruitment or the professional evolution of a member of his family ; • To use the Company’s reputation to obtain a personal advantage. |
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Any question ?

- **I would like to develop my own company in the field of satellite navigation while keeping my position at Telespazio France. Do I have the right to do this ?**

Telespazio France encourages each of its employees to feel themselves professionally satisfied, including the development of own activities and investments. Nevertheless, in order to make sure that this extra activity and your missions in the Company are not incompatible, it shall be verifies that :

- (i) Your are not linked by any exclusivity clause included in your employment contract; and
- (ii) Your extra activity does not compete with any of Telespazio France ones ;

You shall know how to recognise and report immediately any conflict of interest already existing, born or possible to exist from your extra activity.

- **I am in charge of the conception of an offer within the scope of a call of tender and the company where my wife works, the CEO will present a competing offer. Shall I consider that there is conflict of interests ?**

Actually, there might be conflict of interests in such a situation and you should report immediately this situation to your Manager who will tell you the next steps to take.



Contacts

- Legal and Compliance Department
- Human Resources Department



For further information

- Internal regulations of each site
- [Processus Achats REF-TPZF-AC-01-F](#)



Competition Law Compliance

The preservation of the markets where Telespazio France takes part in, implies the respect of free competition and the absolute respect of related regulations.

The legislation forbids to establish relationships that taint competition, including mostly every relationship that prevents prices fluctuation in accordance with the supply and demand leading to market allocation or clients among competitors, as well as any other anticompetitive practice.

In this way, regarding the procurement procedure of public markets, each employee involved commits not to favour illegally the offer of Telespazio France, by influencing, in any way the selection applied by the public client, by exchanging information with the other candidates or by obtaining or searching to obtain, in bad faith, information about the content of competitors' offers.

Likewise, it is important not to exchange much while we discuss with a partner about the possibility to answer to a call of tender in common : if we exchange strategical information, we might lose our freedom to present a separate offer.

|  EXAMPLES OF BEHAVIOUR TO ADOPT |  EXAMPLES OF BEHAVIOUR TO AVOID |
|--|---|
| <ul style="list-style-type: none"> • To guarantee the preservation of Telespazio France and other financial actors' commercial and strategical freedom to set prices ; • Regarding a call of tender, to keep to the bare minimum the information conveyed to the partner before signing any agreement establishing the partnership ; • To avoid any disclosure of confidential information to a competing company and show absolute vigilance in terms of discussions for a co-contracting relationship ; • Only foresee exclusivity clauses when they are supervised and validated by the Legal Department. | <ul style="list-style-type: none"> • To negotiate an exclusivity clause with a commercial partner, without this being justified by one of the exceptions established by the Competition Law ; • To obtain, in bad faith, confidential information of Telespazio France competitors ; • To exchange with potential competitors about prices, services, commercial strategies and participations to calls of tender not related to a partnership established by the Legal and Compliance Department. |

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Any question ?

- **While preparing a call of tender, the public client requests our help to determine technical specifications. Can we provide him with information by encouraging our services ?** It is possible, for the public purchaser, to refer to Telespazio France so as to precise its needs before procurement procedure of a public market. However, these consultations shall never have as an objective or serve to favour the future offer of Telespazio France. It is thus forbidden to influence the content of the upcoming call of tender. This request shall be immediately reported to your Manager and to the Legal and Compliance Department.
- **We are planning to develop an R&D software working in close collaboration with another company. Can we conclude that, from now on, the commercialisation of this software will only be performed through our partner when we preserve the commercial exclusivity of this product all around the world ?**
Except in supervised cases and particularly regarding distribution agreements, the market allocation, including the geographic ones are forbidden by the Competition Law since such kind of relationship will limit the free game of competitors between Telespazio France and its partner.



Contacts

- Legal and Compliance Department



For further information

- [Processus Vente](#)

Trade Compliance (export control)



Telespazio France carries out its activities in several countries. Our commercial partners are located in every continent and there is national and international legal restrictions that punish the commercial relationships with some territories or some financial actors, by limiting the export of controlled goods.

Any export or goods transfer and data subjected to export restrictions shall be previously controlled by the Trade Compliance (Export Control) Manager in order to guarantee the prior obtention of all legal authorisations requested for this export.

Any commercial relationship (purchase, sell, partnership, data exchange...) with a third party shall systematically be preceded by a prior control so as to ensure that all applicable regulations are respected by the Company, considering that:

- (i) Any commercial relationship with a third party located in a country belonging to the list of sensitive countries, established by Leonardo Group, can only begin after having the autorisation of the Trade Compliance Coordinator Telespazio Groupe resulting from a control procedure carried out by the Trade Compliance Unit of Groupe Leonardo ;
- (ii) Once the goods classification to be exported or transfered has been established, specific procedures will be activated and adapted to each class : Une fois que la classification des biens à exporter ou à transférer a été établie, des procédures spécifiques seront activées et adaptées à chaque classe : MGA (War Material and related) or Double Use Goods.

These procedures shall be applied with the support of the Trade Compliance Manager of Telespazio France.

|  EXAMPLES OF BEHAVIOUR TO ADOPT |  EXAMPLES OF BEHAVIOUR TO AVOID |
|---|---|
| <ul style="list-style-type: none"> To foresee any commercial relationship with a third party located in a country that appears in the list of sensitive countries established by Groupe Leonardo to allow the requested deadline to perform the control procedure ; To classify all exported, reexported or transfered products in order to identify and separate controlled products ; To foresee any upcoming export, reexport or controlled goods transfer to | <ul style="list-style-type: none"> To think that it is only an administrative procedure with no consequences ; To begin export control mesures some days before an offer request ; To think that just the military material is concerned by these mesures ; To consider that the supplier's committment in his contract is enough to protect Telespazio France liability. |

allow the requested deadline of the control procedure.

- To apply all the instructions of Trade Compliance procedures.



Contacts

- Trade Compliance Manager/ Supply Chain Department ;
- Procurement Department.



For further information



- [Instruction contrôle des exportations nationales françaises REF-TPZF-TC-XX-F](#)
- [Règlementations relatives à l'export REF-TPZF-TC-02-F](#)
- [Organisation de la chaine Trade Compliance REF-TPZF-TC-03-F](#)

ASSETS PROTECTION

Confidentiality and data protection

The information and data represent a main commercial and strategical asset for Telespazio France. This information, at the heart of the Company's know-how, shall be considered as Telespazio France property and its spread shall be controled. In this way, each employee should assess the sensitiveness degree of information and to ensure that its disclosure will be done with discernment and after ensuring a suitable contractual protection.

Si l'acquisition de nouvelles connaissances est un enjeu majeur pour nos activités, il demeure primordial que celles-ci soient acquises légalement et dans le respect des droits des tiers.

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|  <p align="center">EXEMPLES DE BEHAVIOUR TO ADOPT</p> <ul style="list-style-type: none"> • To make sure about a confidential agreement signature previously approved by the Legal Department prior to any exchange of information with a third party ; • To inform in writing about the confidential basis of all the information orally disclosed by a third party ; • To report any negligence to confidentiality contractual obligations. |  <p align="center">EXEMPLES OF BEHAVIOUR TO AVOID</p> <ul style="list-style-type: none"> • To think that a piece of information that apparently seems « insignificant » cannot be an strategical advantage for the Company ; • Not to take into account the confidentiality contractual obligations based on confidential information of third parties lead by a confidentiality or mentioned as confidential agreement ; • To keep quiet about any negligence regarding confidentiality obligations of third parties. |
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Any question ?

- **I am a developer working at Telespazio France. In my free time, I got the idea to develop a software that could be appealing for the aerospace industry. Can I commercialise it ?**

First of all, in order to commercialise it, you shall make sure to be its owner. Actually, the employee remains the owner of any software he develops in his free time and on his own. However, when the software is developed within his missions at Telespazio France, or even not related to his missions, if it has been developed at his workplace or during his working hours and thanks to the Company's equipments, the software property automatically belongs to Telespazio France. In such a situation, we suggest you to report this situation to your Manager as soon as possible.

Puis, si vous en êtes légitime détenteur, il vous appartiendra de vérifier que la commercialisation de ce logiciel ne constitue pas une activité concurrente à l'une des activités de Telespazio France, sans quoi cela irait à l'encontre de votre obligation de loyauté envers votre employeur.



Contacts

- Legal and Compliance Department
- Strategy Management Department





For further information

- Internal regulations of each site

Management of classified or related information

Regarding Telespazio France activities in the field of aerospace and defense, some projects can lead to the access or possession, by Telespazio France and its employees, of sensitive information, either protected by protection instructions (Limited Disclosure or *Spécial France*), or classified by levels (Secret or Very Secret). We therefore speak about national defense Secret, legal denomination that contributes to the protection of essential interests for the Nation by protecting the disclosure of information that will be harmful to defense and national safety.

Each of its employees and commercial partners of Telespazio France shall be aware of the fact that their information is subjected to specific regulations, that vary from one country to another, by limiting its access and disclosure conditions and strictly punishing any attempt to their protection, including penal sanctions at a social and individual level.

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| <div style="text-align: center;">  <p>EXAMPLES OF BEHAVIOUR TO ADOPT</p> </div> <ul style="list-style-type: none"> • To respect the procedure of elementary control for anyone having access to Telespazio France sites (partners, service providers, students, trainees, etc.); • To make sure that your interlocutor is able to receive and protect sensitive or classified information and he will only convey it to third parties who are legally enabled to receive this information in accordance with legal provisions applicable to its level of protection ; • To make sure about the need of his interlocutors to know about this information (Just get to know a piece of information with the unique goal of accomplishing his mission) ; • Only get to know classified documents through accredited networks by the State | <div style="text-align: center;">  <p>EXAMPLES OF BEHAVIOUR TO AVOID</p> </div> <ul style="list-style-type: none"> • To compromise classified information, this is to say to let it know to a skilled person or someone who does not need to know about it. • To be aware of classified information if there is no service requirement within his mission, even if we are enabled to. • Keep quiet any negligence about legal confidentiality of sensitive information. • To store it on his computer or on the internal network of classified documents ; • To store sensitive documents (Restrictive Spreading or Special France) in plain language on his computer or internal network ; |
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and after referring to the Safety Office of Telespazio France ;

- To store sensitive files (Restrictive spreading ou Special France) on individual positions and on the network only after putting a cost on them thanks to one of the certified software of cryptography (ACID ou ZedPro) ;
- To print the sensitive documents (Restrictive spreading or Special France) only through an aimed printER, non connected to the network and after plugging in the computer through USB;
- Request a piece of advice to the Safety Office (contact details bellow) to put into practice protection rules ;
- To report any negligence to legal or contractual obligations of confidentiality.

- To print classified documents ;
- To print sensitive documents thanks to your personal printer or the common printer of the floor you work at.



Any question ?

- **What is the difference between a mention of protection and a classification level ?**
The classification testifies about the violation that might be addressed to defense and national safety through the disclosure of some information or supports. There is two levels of classification : Secret and Very Secret.
Protection mentions (Restrictive Spreading, Special France) are not levels of classification. Their degree of protection helps to make the user aware of the requested discretion he shall show when handling the information defined by these mentions.
- **Who to contact if I have a question about data protection ?**
Telespazio France has a Safety Office (contact details bellow) that guides employees in accordance with protection rules.
- **Can my liability be threatened if I do not respect the rules of access, management and spreading of sensitive information ?**
The secret is a major target of foreigner services or groups whose main objective is to destabilise the State. This is why the non-respect of the applicable regulations might engage your penal liability and provoke serious sanctions.

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Contacts

- Safety Office : tpzf.officiersecurite@telespazio.com



For further information



- Internal regulations of each site
- [Instruction générale interministérielle n°1300 relative à la protection du secret de la défense nationale](#)
- [Instruction interministérielle n°2100 pour l'application en France du système de sécurité de l'OTAN](#)
- [Instruction générale interministérielle n°2102 sur la protection en France des informations classifiées de l'UE](#)
- [Instruction Interministérielle n°901 relative à la protection des systèmes d'informations sensibles](#)

Protection of privacy and personal data

Employees' private life is a key principle for Telespazio France that commits to protect personal data of its employees by strictly respecting the applicable regulations to personal data processing, and particularly to the European Regulation n°2016/679 specified as « General Regulations on Data Protection Règlement » ou « GRPD ». In this way, Telespazio France commits to only deal with personal data requested of it well functioning and to the management of its activity, subjected to obtaining a prior consent of the person concerned.

The respect of private life of its employees is also ensured through the respect of any information associated with its private life, its personal context and relationships between employees.

Personal data coming from outside Telespazio France (financial partners, subcontractors, temporary workers...) shall be protected in the same way.

|  <p align="center">EXAMPLES OF BEHAVIOUR TO ADOPT</p> |  <p align="center">EXAMPLES OF BEHAVIOUR TO AVOID</p> |
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| <ul style="list-style-type: none"> • To make sure about the prior authorisation of any concerned person before collecting and handling its personal data on behalf of Telespazio France ; • Only collect or handle personal data requested to the identified goal ; • To report any human, material or digital fault in the protection of personal data handled by Telespazio France ; • To destroy all personal data that is no longer requested for the identified goal. | <ul style="list-style-type: none"> • Utiliser des données personnelles pour une finalité différente que celle ayant reçue le consentement de la personne concernée ; • Conserver des données personnelles n'étant plus nécessaire à la finalité initiale car « on ne sait jamais ». |



Any question ?

- ***What is personal data?***

Personal data is all information related to a physical human being who might identify him or her, directly or indirectly.

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Are considered as personal data the following data : a surname, a name, a picture, a postal address, an e-mail address, a phone number, social security number, an internal ID number, an IP address, a username of a remote connection, a voice recording, etc.



Contacts

- Data Protection Officer : dpo.fr@telespazio.com



For further information

- [Processus de traitement de l'information – Conservation des documents et politique de destruction REF-TPZ-TI-04-F](#)

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Communication Management

To communicate means to exhibit oneself. And to exhibit comes along with expectations and exigences, mostly moral, the ones that cannot be infringed. The audience, in every sense, is henceforth looking for transparency in every shape and form. The way companies materialise this notion has an influence in decision-making to choose this or that brand, this or that product or service. Ethics have become a major asset for the Company and its image in front of the attending parties, it is at the heart of its communication.

As you already know it, Telespazio France has begun a process of definition of its identity, mostly through the brand platform, that shows the essens of our values and also defines our vision and reason for being. This DNA reassertion outlines the responsabilites we would like to assume : social, societal, environmental and ethical.

In the communication field, ethics are based on honesty, exemplariness and sense.

Honesty excludes the fact of leading a client, a partner or a supplier to make a mistake by letting them believe a false thing, or by manipulating them in the comprehension of a message.

Exemplariness means constancy and the absence in time of any kind of deviation regarding the behaviour guide established by the Company within a constant frame of its identity.

The sense, finally, defines a stage that prevents us from getting lost. To have a communication perceived as ethical requests to be, in any circumstance, in accordance with our values and to ensure on a daily basis, sense to what we do. « What is the reason for existing and is what I do in accordance with and at the service of this sense ? » This is the concern that creates and makes success of our ethical communication approach.

**EXAMPLES OF
BEHAVIOUR
TO ADOPT**

- To have a clear, constant, traceable and transparent course of action. Exemplariness can only be provisional or occasional ;
- To choose, in every circumstance, honesty and transparency in the protection of our Company and its services, with no over promise, omission or imprecision ;
- To assess *a priori* the impact of any public speaking, personal or collective, towards the Company (its activities, its organisation...) or its stakeholders.
- On social networks, scrupulously make sure that there is no possible confusion between your opinions and personal positions and those of the Company ;
- To inform the Communication Department about any communication request concerning Telespazio France, its activities, its management, its employees... ;
- To inform the General Management and verify with the Communication Department before sharing with a third party any kind of significant information concerning Telespazio France, even if it does not show a priori any sensitive or confidential nature.

**EXAMPLES OF
BEHAVIOUR
TO AVOID**

- To introduce ourselves as someone or something we are not and characterise, explicitly or implicitly, our Company and services with features they do not really have ;
- To make denigrating, abusive or defamatory remarks towards Telespazio France, its activities, its employees, its clients, its competitors, its suppliers... either orally or in writing (social networks or any other public media) ;
- To consider that social networks are just a space for private exchanges where the only moderation rules would be the ones of the concerned network by neglecting the contractual obligations associated with your Company Enterprise ;
- To manage public speaking of Telespazio France without referring to the Communication Department ;
- To provide, on your own initiative, to media or spread on social networks, or any other communication channel, any information concerning Telespazio France without formally informing the Communication Department.

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|  <p>TELESPAZIO a LEONARDO and THALES company</p> | <p align="center">TELESPAZIO FRANCE</p> <p align="center">CODE OF ETHICS TELESPAZIO FRANCE</p> | <p>Date : 04/04/2022 (FR) 16/01/2024 (EN)</p> <p>Issue : 1 Page : 41/46</p> |
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Any question ?

- My client requests me to participate in a shooting or in a TV show concerning a promotional event for his company : What should I do ?**
To participate and contribute to our clients' communication its a very positive thing itself. Nevertheless, it is essential to inform the Communication Department of Telespazio France that might analyse the request and guarantee the consistency with our values and principles of ethical communication we defend. This also allows to add value to the Company and favour the mission of promotion and protections of the image belonging to the Communication Department.
- I received a message through LinkedIn from someone who, during a conversation conversation, aks me my point of view concerning an incident that happended during a launch in Kourou some days ago.**
What should I answer ?
When we deal with sensitive subjects, the principles of honnesty and transparency shall not disappear. Nonetheless, not every employee is supposed to speak in public, without conciliation or scooping guidelines about all sensitive subjects. Quite the opposite ! It is about informing our interlocutor thatwe cannot express ourselves on these subjects. We should also address our interlocutor to official communication channels and to inform as soon as possible the Communication Department, and if activated, the crisis centre that will follow the procedure and decide on the behaviour to adopt and the following steps to the question asked.
- I have been contacted by a club, an association, a structure or a journalist for drafting an article about Telespazio within the scope of my position. Can I answer favourably to this request ?**
We are always favourable to the expression of our expertise in the different fields when this arouses the interest of media or journal support. Nevertheless, in order to avoid any risk, the behaviour to adopt in this case is, before confirming any principle agreement, to inform the Communication Department who will assess the need to exchange with the Support Department so as to verify the repercussions for the Company. In any case, an internal exchange with the Communication Department will be need itin order to be in harmony with communication approaches and gurantee the respect of the Company's values while the intervention takes place.

Contacts

- Communication Department Manager

For further information

- Telespazio France brand platform;
- Telespazio France corporate identity and style guide.



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Integrity of Accounting Reports

Some procedures and a specific organisation are being settled by Telespazio France in order to guarantee the traceability of financial operations, the accounting transparency and the absolute respect of applicable regulations. The respect of these procedures and legal exigences are key to protect Telespazio France against serious sanctions but they also allow to guarantee a clear image of the economical and situation of the Company and to preserve its reliability and reputation.

Each operation or transaction shall allow the verification of its legitimacy, of its autorisation, its harmony, its accurate recording and its traceability. Therefore, any operation shall be associated to a clear and complete documentation. It is necessary to respect the principle of segregation : powers of autorisation, execution, recording and verification of each operation and transaction are conferred on different people so as to ensure a control performs in several phases.

The veracity, exhaustiveness and clearness of basic information are essential for the transparency of accounting records and represent a key value for Telespazio France. Any person who might be aware of possible omissions, falsifications or irregularities in the accountancy and the basic related documents, or of any other infringement of announced principles in this Code, is required to inform immediately his hierachy or, otherwise, the Ethics and Compliance Manager in accordance with the warning device.

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| <div style="text-align: center;">  <p>EXAMPLES OF BEHAVIOUR TO ADOPT</p> <ul style="list-style-type: none"> • To hand in all the required written evidence to the control of an operation or a transaction ; • To respect all the procedures that guarantee the integrity and transparency of our accounting reports ; • To report any fault or negligence to the procedure mentioned herein. </div> | <div style="text-align: center;">  <p>EXAMPLES OF BEHAVIOUR TO AVOID</p> <ul style="list-style-type: none"> • Not to correct or fill in the incorrect or incomplete data ; • Not to verify the veracity of the given data within the scope of operations. </div> |
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***Contacts***

- Administrative and Financial Department
- Ethics and Compliance Department : ethique-conformite@telespazio.com

***For further information***

- [Processus Finances et Gestion REF-TPZF-FG-01-F](#)



ENVIRONMENT

The environmental advantages of its activities belong to Telespazio France strategy. Therefore, Telespazio France contribute with its clients and commercial partners to the development of processes and state-of-the-art for the effective and sustainable use of resources and for pollution prevention. Its environmental policy, directly declined from its strategy, Sa politique environnementale, directement déclinée de sa stratégie, comporte includes three sections :

1. To favour a profitable growth for the environment and the protection of our ecosystem in accordance with our economic forecast ;
2. To promote the Corporate Social Responsibility (CSR) at every level of the Company ;
3. To work according to environmental applied exigences.

These commitments materialise mostly by :

- The obtention of ISO 14001 certification for Toulouse Establishment and for the other Establishments as well ;
- Telespazio France compliance to its regulatory obligations regarding the environment protection;
- The limitation of our environmental footprint with the update of the Travel Policy and the settlement of a mobility plan, the waste sorting and our wasting products, the limited number of plastic bottles, The project of digital transformation, the identification of committed partners into an environmental approach and the settlement of electrical terminals to charge electrical vehicles of Toulouse site's employees.

|  <p align="center">EXAMPLES OF BEHAVIOUR TO ADOPT</p> | <p align="center">EXAMPLES OF BEHAVIOUR TO AVOID</p>  |
|--|--|
| <ul style="list-style-type: none"> • Take into account environmental stakes at every level of its activity and its project ; • To limit the electrical consumption to its needs and turn off the lights of rooms and offices while they are empty ; • To store and use the highest amount of data in a local way in order to limit round-trips between users and servers. | <ul style="list-style-type: none"> • To leave windows open while the air conditioning or heating are on ; • To throw rubbish away without respecting waste sorting instructions ; • Not to take into account water leaks or not to report them to the Logistics Manager of the Establishment ; • Not to tun off one's computer in the evening before leaving the office. |

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Any question ?

- **As Telespazio is not an industry, might it really have any negative impacts on the environment ?**

Any organisation that produces goods or services interacts with the environment, Tout organisme qui produit des biens ou des services interagit avec l'environnement, either by air, water, ground, natural resources, flora, fauna or human beings. Consequently, our activity can modify the environment, in a positive or negative way. Concerning the process of ISO 14001 certification of the Establishment of Toulouse, we have performed an environmental analysis that led us to highlight all these impacts. The most significant ones are those consisting in natural resources sampling (electricity, and fossil fuel mainly) and air pollution. They result from the following activities :

- Business trips by plane or car ;
- Logistics related to goods transport ;
- Home/ work trips in a personal and thermic vehicle ; and
- Electrical consumption on Toulouse site.

Some actions have been engaged and scheduled. They will be followed and will contribute to improve our environmental performance and to reduce the negative aspects that we have identified.

- **I am a business manager and I would like to analyse the environmental risks related to one of my projects. How to proceed ?**

In compliance with our process of ISO 14001 certification, the risks and opportunities linked to the environment have been added to the check list allowing us to identify the potential risks of an issue within the Business Process Management. Eight questions, distributed into three large topics (Environment, Transport et Numérique) leading to distinguish risk factors associated with an issue and to identify the potential risks.

Thus, in addition to frequent questions, you will need to answer precise questions by using Yes or No, leading to identify the possible environmental impact of the issue in all its stages.

- **I am a software developer. How might I behave in order to limit the ecological footprint of my activity?**

You can behave taking into account the software eco-conception, or green code, that allows companies to add criteria of environmental impacts from the creation of an application or digital service in order to decrease the impacts all through its life cycle. It is applied during conception phases (functional, technical architecture), of development (coding and integration) and of operation (data storage). Finally, it allows to decrease the use of resources by the software while it is being used.

Many other initiatives are possible to make an information system eco-responsible. If we have to buy new computers, we will favour those being mainly characterised by its environmental performance. This is particularly the case of laptops that belong to the software parc of Telespazio France since their EPEAT label places them among the best eco-designed equipments.

***Contacts***

- The Establishment Management
- The Human Resources Department
- HSE Manager: tpzf.hse@telespazio.com
- CSR Project Manager

***For further information***

- [Processus SSE REF-TPZF-SSE-01-F](#) ;
- [Processus Conduite d’Affaire – Gérer les risques et les opportunitésREF-TPZF-CA-06-F](#).