

CODE OF CONDUCT



TABLE OF CONTENTS

OUR VALUES AND COMMITMENTS

- > UNCONDITIONAL CUSTOMER SERVICE
- > TRUST AND TEAM SPIRIT
- > RESPONSIBILITY AND COMMITMENT
- > PERFORMANCE AND INNOVATION
- > FAIRNESS AND ETHICS IN BUSINESS

COMPLIANCE WITH LAWS AND REGULATIONSWORK IN AN ENVIRONMENT RESPECTFUL OF HUMAN RIGHTS

- > FIGHT AGAINST CHILD LABOR
- > FIGHT AGAINST MODERN SLAVERY

WORK IN AN INCLUSIVE ENVIRONMENTWORK

WORK IN A HEALTHFUL ENVIRONMENT

WORK IN A SECURE ENVIRONMENT

WORK IN A GROUP CONCERNED WITH THE ENVIRONMENT AND ENCOURAGING RESPONSIBLE PRACTICES

WORK IN AN ENVIRONMENT FREE OF BRIBERY IN ALL ITS FORMS

- > FIGHT AGAINST BRIBERY
- > FIGHT AGAINST INFLUENCE PEDDLING
- > PROHIBIT FACILITATION OR GRATUITY PAYMENTS
- > FIGHT AGAINST FRAUD
- > FIGHT AGAINST MONEY LAUNDERING

ENSURE COMPLIANCE WITH THE "GIFTS AND INVITATIONS" POLICY

ENSURE COMPLIANCE WITH FAIR COMPETITION

BAN ANY RISK OF CONFLICT OF INTEREST

FIGHT AGAINST THE USE OF PRIVILEGED INFORMATION FOR PERSONAL BENEFIT OR TO BENEFIT A CLOSE RELATIVE (INSIDER TRADING)

RESPECT AN HONEST AND FAIR PROCEDURE FOR THIRD-PARTY PARTNER SELECTION

RESPECT A STRICT POLICY OF CONFIDENTIALITY AND DATA PROTECTION

ENSURE RESPECT FOR THE IMAGE AND REPUTATION OF THE GROUP AND ITS STAKEHOLDERS

CONSIDER THE RIGHT QUESTIONS AND ENSURE COMPLIANCE WITH EXPORT CONTROL REGULATIONS

RESPECT INTERNATIONAL SANCTIONS AND EMBARGOES

USING THE WHISTLEBLOWING PROCEDURE

FOREWORD



OLIVIER PEDRON
CHIEF EXECUTIVE OFFICER

In a constantly changing world, where challenges are many and varied, it is essential to remain faithful to our fundamental values and to maintain the highest standards in terms of ethics and integrity.

It is therefore with great conviction that SOGECCLAIR provides its employees, suppliers, partners, customers and other stakeholders with this Code of Conduct, which reflects its commitment to act responsibly and to respect the principles and values it embodies.

With this Code of Conduct, we aim to provide everyone with a valuable guide to our day-to-day decisions and behavior. It reflects our vision and values, and reminds us of the importance of honesty, respect, fairness and transparency in all our interactions, both internally and with our external partners.

Each of us plays a crucial role in maintaining the reputation and integrity of our company. Our individual actions have a collective impact, and together we can maintain a safe, respectful and prosperous working environment.

We all share responsibility for implementing and respecting these principles. Our engagement is essential to our long-term success.



SOGECCLAIR GROUP CODE OF CONDUCT

The present Code of Conduct represents the minimum commitments and values that any person, natural or legal, in relation with the SOGECCLAIR Group, undertakes to respect.

This code of conduct is therefore intended to apply to all the stakeholders of the SOGECCLAIR Group, itself made up of the Company SOGECCLAIR SA and all its subsidiaries, hereinafter referred to as "SOGECCLAIR".

Aware of the role and responsibility that are assigned to it, especially given its culture and its international dimension, SOGECCLAIR commits itself to ensuring that its practices are in line with a so-called "responsible" logic and in conformity with the standards and principles of business ethics.

In this sense, it attaches to respecting the laws and applicable regulations, and it devotes particular attention to human rights and the environment.

In order to formalise this objective, SOGECCLAIR has decided to deploy the present Code of Conduct and to define in concrete terms the commitments that it intends to apply and to have all its stakeholders to respect, in terms of business ethics and corporate social responsibility.

The Code of Conduct is intended to apply to all the actors linked to SOGECCLAIR. In particular, it aims to enable each of the stakeholders to understand the applicable rules, to guide them in complying with them and to inform them about the procedure to follow in order to report a breach.

In order to make it accessible and known to everyone, it is addressed to all employees in each of its subsidiaries, it is communicated to the business partners if necessary, and it is made available online on the Internet website (<https://www.sogecclair.com>).

OUR VALUES AND COMMITMENTS

Its internal culture, its history and its know-how have forged the identity of **SOGECCLAIR**, which is based in particular on the following values:

TRUST AND TEAM SPIRIT

As a team, **SOGECCLAIR** addresses its customers' needs by relying on a service based on market expertise, on the diversity of knowledge held by each of its employees, and by ensuring unconditional customer service.

At **SOGECCLAIR**, we place the relationship with our collaborators at the heart of our concerns and ensure that there is between us, as well as with our business partners:

- > listening,
- > transparency,
- > co-construction.

RESPONSIBILITY AND COMMITMENT

Our commitment is based on the lasting satisfaction of our stakeholders.

SOGECCLAIR, as a key player in sustainable mobility, not only has the ambition to act for a carbon neutral energy transition but also to put human being at the heart of this transition by promoting inclusion. Our global approach allows us to implement our actions at territorial level but also at international level by relying on all our stakeholders to have a positive impact and to address societal issues.

PERFORMANCE AND INNOVATION

As mobility brings people together and promotes the creation of wealth throughout the world, **SOGECCLAIR** is committed to maintaining its leadership on an international level.

Thus, as a supplier of innovative, high added-value solutions for safer and more efficient mobility, we bring its skills in high-quality engineering and production to the aeronautics, aerospace, automotive, railway and defence sectors.

To achieve this, **SOGECCLAIR**'s engineers and technicians are committed to providing innovative products and services to manufacturers and operators to make their equipment safer and more efficient.

At **SOGECCLAIR**, we offer expertise in mechanical and simulation technologies, as well as industrial processes.

We are continuously looking for improvements to sustain our successes and correct our mistakes, and we are constantly adapting our processes, practices, and solutions to tomorrow's needs.

FAIRNESS AND ETHICS IN BUSINESS

Respect for human rights and business transparency are at the heart of our commitments. We have a zero-tolerance stance towards unethical behaviour and take the necessary steps to ensure that stakeholders related to our Group meet the same level of requirements.

COMPLIANCE WITH LAWS AND REGULATIONS

As a key player in the transportation industry operating internationally, some of our activities are governed by the laws of the countries in which we operate and/or those of the countries with which we have business relationships.

In case of uncertainty concerning the applicable law or policy or if you think that there is a conflict between local laws/regulations and our internal policies, we invite you to contact your manager, and/or the legal department, and/or the General Management of the Group, and/or your referent if you are a partner of SOGECCLAIR.

SOGECCLAIR has chosen to be a responsible and trustworthy company towards all its stakeholders. It is committed to ensuring that each of its activities is conducted in a healthy and honest environment.

In particular, SOGECCLAIR commits itself to respecting all the laws and regulations currently applicable to its activity.

WORK IN AN ENVIRONNEMENT RESPECTFUL OF HUMAN RIGHTS

SOGECCLAIR pays particular attention to the respect of human rights and dignity.

It therefore encourages fair practices in the workplace, advocates benevolence and inclusion, and ensures an environment in which intimidation, discrimination, sexist behaviour and harassment are prohibited.

SOGECCLAIR strictly prohibits the use of child labour or modern slavery in any form.

FIGHT AGAINST CHILD LABOR

Targets individuals below the minimum legal age for employment in the country in which the work is performed.

AND

Applies to individuals below the minimum age of employment as defined by the International Labour Organization.

FIGHT AGAINST MODERN SLAVERY

SOGECCLAIR aims to banish modern slavery in all its forms, including:

- > Human trafficking
- > Forced labour

- > Debt bondage
- > Slavery

WORK IN AN INCLUSIVE ENVIRONNEMENT

As a signatory of the Diversity Charter since 9 December 2008, **SOGECCLAIR** promotes a diverse and inclusive working environment.

At **SOGECCLAIR**, we encourage a fair working environment.

In this sense, we seek to promote equal opportunities for all employees or candidates across the same territory, in terms of recruitment, training access, remuneration, social protection, internal mobility and career development.

Only the skills, experience and personal aptitudes of the individual are taken into account.

Indeed, the Group's employees, as well as candidates under recruitment, are treated with dignity and respect without exception, regardless of the following elements:

Ethnic, social or national origins.

> Race or skin color.

> Religious affiliation or beliefs.

> Age.

> Disability.

> Trade-union activities.

> Gender or gender identity.

> Sexual orientation or preference.

> Marital status.

> Citizenship status.

> Political preferences.

> Philosophical preferences.

WORK IN AN HEALTHFUL ENVIRONMENT

SOGECCLAIR guarantees a working environment free from harassment, whether physical, psychological, sexual, or virtual.

Harassment consists of repeated acts that can lead to a deterioration in the working conditions of the victim.

These acts are often the cause of harmful effects of the company and its employees, including loss of motivation and productivity of employees, but also in increase in stress and absenteeism, and even resignations.

At **SOGECCLAIR**, we prohibit the use of harassment, and we constantly ensure that we offer our employees and stakeholders a healthy working environment.

If you think that you are a victim of harassment, you should contact your line manager, and/or the Human Resources Department, and/or the Group's General Management, and/or your referent if you are a **SOGECCLAIR** partner.

Anyone who is found to have committed such acts will be subject to sanctions.

EXAMPLE OF INTIMIDATION OR HARASSMENT (NON-LIMITATIVE LIST):

You may be subject to sanctions if you share inappropriate photos of your coworker, spread malicious rumours or misleading statements about your coworker, regularly and repeatedly insult your coworker, or make inappropriate gestures or statements about your coworker.

WORK IN A SECURE ENVIRONMENT

The health, safety and working conditions of employees and service providers are an absolute priority for SOGECCLAIR.

At SOGECCLAIR, we set up prevention, information, and training actions for our employees.

Furthermore, as a collaborator, you are notably required to:

- > Maintain a safe, clean and healthy work environment.
- > Not to contribute to the endangerment of others or oneself.
- > Respect internal procedures and those of business partners, in terms of safety, health and hygiene.

- > Contribute to the identification of areas for improvement in prevention and safety plans.
- > To report any fact likely to cause a risk to others so as to enable SOGECCLAIR to take the appropriate preventive and corrective measures.

WORK IN A GROUP CONCERNED WITH THE ENVIRONMENT AND ENCOURAGING RESPONSIBLE PRACTICES

SOGECCLAIR is committed to conducting its activities into account their impact on the environment.

To this end, it aims at implementing internal procedures and policies for the effective management of its environmental performance.

SOGECCLAIR's stakeholders are committed to developing, manufacturing, and supplying innovative products and processes with the lowest possible environmental impact during their life cycle.

Its environmental policy is defined by the following three principal areas:

- > Eco-actions.
- > The means devoted to the prevention of environmental risks and pollution.

- > The consideration of social and environmental issues in the purchasing policy and in relations with suppliers and subcontractors.

WORK IN AN ENVIRONMENT FREE OF BRIBERY IN ALL ITS FORMS

SOGECCLAIR applies a zero-tolerance policy regarding bribery and influence peddling.

It is therefore strictly forbidden for all employees or any person acting on behalf of or in relation to the Group to resort to corrupt practices.

All of SOGECCLAIR's stakeholders have, in this sense, the obligation to ensure the conformity of their activities and to carry out due diligence in order to prevent and detect corruption within the Group.

SOGECCLAIR invites its employees to find out about their business partners, by means of the so-called « due diligence » procedures.

We remind you that the offences detailed below are strictly prohibited. If you fail to comply, if you fail to do so, you may be subject to severe disciplinary sanctions within the Group, and more generally to legal sanctions (imprisonment and fines).

FIGHT AGAINST BRIBERY

Corruption is defined as the act of soliciting or accepting an advantage, good or service of any kind, in return for performing or refraining from performing an act related to one's duties.

Bribery is said to be "active" when a person **offers an undue advantage** to a competent official to perform, not to perform or to delay an act of his or her function.

-> In this case, you are the briber.

Bribery is said to be "passive" when a competent official **accepts an undue advantage** to perform, not to perform or to delay an act of his function.

-> In this case, you are the bribe-taker.

Active bribery and passive bribery are two complementary, but also distinct and autonomous offences.

In fact, they may be subject to separate procedures and sanctions.

EXAMPLE OF ACTIVE BRIBERY:

You promise a generous sum of money to one of your customers if he agrees to refuse to sign a contract with one of your competitors.

Here, the customer is the bribe-taker, and you are the briber.

EXAMPLE OF PASSIVE BRIBERY:

Your supplier promises you a vacation if you sign a contract.

Here, the supplier is corrupt, and you are corrupted.

FIGHT AGAINST INFLUENCE PEDDLING

Influence peddling is defined as the fact of abusing the influence (real or supposed) a person has with a public authority to obtain an advantage or a favourable decision for a third party.

Here, the bribe-taker uses his influence with the decision-maker to obtain a decision favourable to the briber.

EXAMPLE OF INFLUENCE PEDDLING:

You offer or agree to pay a public official to use his or her influence to obtain a decision in favor of work on your premises.

PROHIBIT FACILITATION OR GRATUITY PAYMENTS

Facilitation payment is defined as offering, promising, making, accepting, or agreeing to accept undue payments or anything of value, to a public official for the completion or acceleration of administrative formalities that should be obtained through normal legal channels.

EXAMPLE OF FACILITATION PAYMENTS:

You offer a sum of money to a public official in order for him to ensure the issuance of your visa before your trip abroad scheduled for the following week.

FIGHT AGAINST FRAUD

Fraud is defined as the act of misleading, manipulating or falsifying information, documents, transactions, or processes in order to obtain an illegal or undue advantage. It can be used to conceal corrupt acts.

This includes falsifying documents, misrepresenting, or deliberately omitting relevant information in order to benefit financially or otherwise.

EXAMPLE OF FRAUD:

You falsify a financial report to hide unauthorized expenses or to inflate a company's revenues to obtain more funding or tax benefits than are actually due.

FIGHT AGAINST MONEY LAUNDERING

Money laundering is the process of concealing the illicit origin of funds, often derived from crimes such as corruption. Money laundering enables corrupt individuals to "clean up" gains obtained by illegal means so that they appear legitimate.

EXAMPLE OF MONEY LAUNDERING:

You agree to be billed by a subcontracting company for technical services or strategic advice that were never rendered. By making these payments, illegal money is "laundered" through the company, giving the appearance of legitimate transactions.

FOCUS AND IMPLEMENTATION OF THE PROCEDURE TO FOLLOW IN CASE OF ATTEMPTED BRIBERY

You decide to meet the representative of a company to discuss its potential listing as a supplier. During this exchange, he tells you that if he succeeds in being listed within SOGECLAIR, "he will thank you".

As SOGECLAIR has adopted a zero-tolerance policy towards any risk of bribery, you must therefore:

Reply to your interlocutor that such a practice is contrary to the values of the Group and its desire to be in full compliance with the legislation in force.

Inform your line manager, and/or the legal department, and/or the Group's General Management, and/or your referent if you are a partner of SOGECLAIR, and/or use the "whistleblowing procedure".

ENSURE COMPLIANCE WITH “GIFTS AND INVITATIONS” POLICY

SOGECCLAIR invites its employees to ensure that the gifts and commercial gestures offered or received are authorised by the legislation in force.

These must correspond to accepted practices and customs in the business world.

They are only accepted if they are of reasonable value, comply with the local regulations in force and are free from any intention of granting or giving an undue advantage. **SOGECCLAIR** therefore provides its employees with a gifts and invitations policy, which is also available on the Intranet, in order to inform them as well as possible of what is acceptable and what is not.

An employee may not receive, without prior authorisation, the following (non-limitative list):

- > cash or loans,
- > valuable equipment or the use of such equipment.

- > free services (e.g. hotel stay etc.).
- > gifts or invitations of unreasonable value.
- > facilitation payments.

EXAMPLE OF A RISKY SITUATION:

A supplier whose contract is expiring offers you a ticket to your favourite artist's concert (including flight and accommodation).

You cannot accept this gift because, in addition to its unreasonable value, it is a situation in which you might feel indebted to the supplier and want to renew your business arrangements with them.

ENSURE COMPLIANCE WITH FAIR COMPETITION

SOGECCLAIR, believing in free and healthy competition, undertakes to respect and ensure respect for the laws applicable to fair competition.

SOGECCLAIR's employees and business partners therefore undertake not to enter into anti-competitive agreements aimed in particular at fixing prices, rigging bids, creating collusion, limiting supply or controlling markets.

Entering into agreements on prices or sharing markets with partners or competitors is also prohibited.

Similarly, they must ensure that they do not participate in any other activity that would illegally affect competition.

Thus, **SOGECCLAIR** prohibits and sanctions the use of illegal and unfair means to gather information on its competitors, to denigrate them and, more generally, all anticompetitive practices.

EXAMPLE OF ANTI-COMPETITIVE PRACTICE:

As you prepare to respond to a call for tenders, a third-party company suggests that they submit an overpriced bid so that you can win the contract and tells you that you will return the favour.

BAN ANY RISK OF CONFLICT OF INTEREST

The employees and other stakeholders of **SOGECCLAIR** have a responsibility to act with the Group's interests at heart.

They must therefore ensure that their personal interests do not interfere with those of the Group.

Conflicts of interest are common situations in the life cycle of a company, but they must be reported in time to avoid any negative consequences for the Group, its image, and/or its reputation. Any employee who finds himself in a situation likely to be qualified as a conflict of interest must immediately report it to his line manager, and/or the legal department, and/or the Group's General Management, and/or his referent if he is a partner of **SOGECCLAIR**.

IMPLEMENTATION OF THE CONFLICT OF INTEREST

A conflict of interest is the fact that a Group employee uses his or her position to obtain any advantage for himself or herself or for those around him or her. In such situations, it is recommended to:

> Be transparent by reporting to your supervisor, the Legal Department or the Group Human Resources Department any facts in your personal life that may interfere with your work.

> Stay out of situations that may constitute a conflict of interest.

> Do not disclose or use for personal purposes information obtained through your position or through the use of goods or information provided by the Group.

EXAMPLE OF CONFLICTS OF INTEREST:

You work in the Human Resources Department. Your cousin applies for a job offer and you are in charge of the interview.

-> You are in a conflict of interest situation because you will not be objective in the decision making process.

You must immediately withdraw from the selection process of this (these) candidate(s), taking care to inform your supervisor and/or the Group's Human Resources Department.

FIGHT AGAINST THE USE OF PRIVILEGED INFORMATION FOR PERSONAL BENEFIT OR TO BENEFIT A CLOSE RELATIVE (INSIDER TRADING)

It is a violation of company policy to use privileged and confidential information obtained through your job duties to trade in financial instruments or to provide investment "advice" to others.

Some information must be kept confidential until it is officially disclosed.

You are therefore prohibited from disclosing such information to third parties or directing them to buy or sell securities or financial instruments based on the information obtained.

EXAMPLES OF PROHIBITED USE OF PRIVILEGED INFORMATION:

SOGECCLAIR has just won a significant number of contracts in the aeronautical field sector, representing a significant proportion of its annual turnover.

As long as this information has not been made public, it will be impossible for you to use it or to transmit it to your brother/sister who works in finance.

He/she could acquire or help his/her client to acquire shares in the SOGECCLAIR Group.

The SOGECCLAIR Group, listed on the Euronext Paris stock exchange, is required to communicate its turnover every quarter.

In the context of my duties, I have access to this information before the official communication date.

I am prohibited from using this information or communicating it to a third party to buy shares in the SOGECCLAIR Group.

RESPECT AN HONEST AND FAIR PROCEDURE FOR THIRD-PARTY PARTNER SELECTION

SOGECCLAIR ensures that its suppliers and subcontractors are chosen fairly. Thus, its employees undertake to respect the internal procedures aimed at choosing the best commercial partners according to the offers and prices proposed in compliance with the specifications, and with predetermined objective criteria.

These procedures must ensure financial and technical competitiveness between third-party candidates. Respecting the process resulting from the "Purchasing Policy" ensures fair competition between candidates and prevents any act of bribery or conflict of interest.

It is therefore forbidden for any employee to pass on confidential information or to define bid evaluation criteria to favour a particular supplier or subcontractor.

Furthermore, it is strongly recommended to select suppliers or subcontractors who have been approved in particular by a third-party evaluation procedure. It is also mandatory to:

- > Be transparent about the bid selection process.
- > Ensure that the selection of offers is fair and carried out in accordance with technical, objective and predetermined criteria in the consultation.

EXAMPLE OF NON-EQUITABLE PARTNER SELECTION:

The representative of a subcontracting company asks you to communicate to him before the official launch of the consultations, the specifications as well as the selection and evaluation criteria of the offers. In exchange, he offers you tickets for the Rugby World Cup finals.

If you accept, you are committing an act of bribery that would be contrary to the principle of fairness in the selection of partners set out in this Code of Conduct.

RESPECT A STRICT POLICY OF CONFIDENTIALITY AND DATA PROTECTION

Misuse or disclosure of this information could damage our image and reputation in the marketplace, harm our business and even affect our financial results. It is therefore important to adapt certain actions in our daily lives to protect all the data to which we have access. Thus, the best practices to adopt are the following:

- > To the protection of personal data.
- > To respect the intellectual property rights of its business partners and third parties, as well as the confidentiality of all information transmitted to it.

Misuse or disclosure of this information could damage our image and reputation in the marketplace, harm our business and even affect our financial results.

It is therefore important to adapt certain actions in our daily lives to protect all the data to which we have access. Thus, the best practices to adopt are the following:

THE BEST PRACTICES TO ADOPT

- > To collect only the personal data strictly necessary for the performance of our activities and to avoid their transfer to territories that do not offer the appropriate guarantees.
- > Strictly limit the distribution and use of personal information to those with a genuine need to know
- > Use or copy licensed software or information only as expressly permitted by the terms of the license agreement or other applicable commercial agreement.
- > Limit access to computer tools to authorized persons.
- > Limit the distribution of confidential information to only those with a genuine need to know.
- > Disclose information to third parties only if you are authorized to do so AND if such disclosure is necessary to conduct our business.

ENSURE RESPECT FOR THE IMAGE AND REPUTATION OF THE GROUP AND ITS STAKEHOLDERS

SOGECCLAIR attaches significant importance to its image and its reputation. In order to preserve them, it takes care to adopt responsible communication and rejects any form of greenwashing or fairwashing, by which companies resort to advertising and marketing strategies with the aim of giving themselves a responsible image with regard to the environment, when in practice this is not the case.

It is important to consult the communication department before making any statements relating to **SOGECCLAIR**, particularly on social networks.

SOGECCLAIR also undertakes to respect the image rights of all its stakeholders. It therefore aims to inform the persons concerned of any collection of images of which they are the subject as well

as the objective pursued. It also ensures the implementation technical and organizational measures to guarantee their protection.

CONSIDER THE RIGHT QUESTIONS AND ENSURE COMPLIANCE WITH EXPORT CONTROL REGULATIONS

Aware that military equipment as well as dual-use goods are subject to a logic of security on an international scale, **SOGECCLAIR** ensure a level of security for goods, services, and data by means of export control.

SOGECCLAIR undertakes to respect the appropriate procedures in order to ensure compliance with the applicable legislation.

Thus, all employees must comply with the export control procedures in place.

It is therefore important to check the nature and destination of the goods subject to export, in particular by questioning its commercial partners, in order to make the necessary licence applications.

These verifications must be conducted as soon as possible, and if possible, at the tender stage.

RESPECT INTERNATIONAL SANCTIONS AND EMBARGOES

SOGECCLAIR attaches the utmost importance to compliance with international sanctions and embargoes and undertakes to comply strictly with the regulations in force relating to sanctions and embargoes that may affect certain countries, individuals, entities, or economic sectors.

This includes, but is not limited to, the prohibition of supplying goods, services, or technologies to areas subject to international restrictions.

It is therefore essential to be vigilant and to ensure that no transaction or business relationship contravenes applicable regulations. In case of doubt, it is imperative to consult the Legal Team for a due diligence audit.

USING THE WHISTLEBLOWING PROCEDURE

SOGECCLAIR is committed to transparency and trust in its relations with its employees and stakeholders.

To this end, it provides a whistle-blowing procedure enabling anyone to report, in strict confidence, behaviour or situations that may constitute violations of laws, regulations or business ethics principles.

"Whistleblowers" are persons who make a report in good faith and without financial consideration concerning:

- > a crime,
- > an infraction,
- > a threat or harm to the public interest,
- > a violation or attempted concealment of a violation of international law or European Union law, and any other legislation or regulations, as well as this Code of Conduct.

Since the law of March 21, 2022, known as "Waserman", the procedure to be followed by whistleblowers has been simplified. From now on, the whistleblower can choose between internal and external reporting.

INTERNAL PROCESS

Here, the alert can be sent via the internal reporting channel.

Simply download and complete the form available on the intranet and send it electronically or by post to the Legal Department, which will forward your alert to a neutral and objective Compliance Committee.

EXTERNAL PROCESS

In this case, the alert can be sent to:

Here, the alert can be sent to:

- > A competent authority (i.e. administrative, public or independent authorities, professional bodies and legal entities entrusted with a public service mission),
- > The judicial authority,
- > The Human Rights Defender.

If you wish to use the external whistleblowing procedure, we recommend that you contact the Human Rights Defender or his equivalent, who will be able to direct you to the appropriate authority.

Whistleblowers will benefit from adequate protection measures in terms of confidentiality of the report and the procedure, as well as the prohibition of reprisals, provided that the report is made in good faith.

SIGNATORY'S COMMITMENT

SOGECCLAIR's stakeholders undertake to respect the principles of the Code of Conduct.

They must therefore take the necessary measures to transmit the principles of this Code of Conduct to any person having a direct or indirect link with SOGECCLAIR.

The Code of Conduct will form part of the documentation for new hires and subcontracting, but also of the call for tenders' procedure.

Its respect by suppliers will be an important evaluation criterion during the selection process.

By signing this Code of Conduct, employees, subcontractors and suppliers agree that this document constitutes a commitment to the principles set forth herein.

Finally, this document is governed by French law.

SIGNATORY'S NAME

COMPANY NAME

SIGNATURE

DATE (preceded by the words « Good for
acceptance, Read and approved. »)

RECORD OF REVISION

DATE	OBJECT
30 NOV 2023	Initial release
06 MAR 2024	Visual modification of the document to maintain the integrity and consistency of the SOGECCLAIR brand image after the rebranding of SOGECCLAIR, no content modification.
28 AUG 2024	Modification of the foreword
03 DEC 2024	Modification of the corruption section, and introduction of the concepts of international sanctions and embargoes.

APPROVED BY

NAME	FUNCTION	SIGNATURE
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