

## **ETHIC CHARTER**

### **CONDUCTING BUSINESS ETHICALLY AND FAIRLY**

#### **ZERO TOLERANCE FOR CORRUPTION AND BRIBERY**

**SODERN AMERICA does not tolerate corruption nor bribery.**

- We expect that all our employees act in an exemplary manner and according to the internal anti-corruption policies;
- We provide periodic trainings to all our employees on anti-corruption;
- We never solicit the services of third parties that go against our core values and business ethics principles.
- We comply with the U.S. Foreign Corrupt Practices Act ("FCPA") and related laws in the United States and other countries, including the United Kingdom's Bribery Act of 2010 ("U.K. Bribery Act") and the French legislation and cooperate openly with the competent authorities.
- In case of a valid request from a public official concerning an inquiry or a request for information, our employees shall inform the relevant personnel who will then coordinate the response.

#### **GIFTS AND HOSPITALITY**

**SODERN AMERICA does not tolerate undue influence of business decisions.**

- We recognize that gestures of goodwill, such as gifts and hospitality offered to or received from customers, suppliers and other business partners, may be a part of a normal business relationships;
- They may not, on any account, influence or give the impression of influencing a business decision;
- Gifts and hospitalities shall systematically be reported to the Compliance Officer.

## **AVOIDING CONFLICTS OF INTEREST**

### **SODERN AMERICA endeavors to avoid conflicts of interest.**

- It is essential to protect the reputation of SODERN AMERICA and our shareholders;
- Our employees should inform their line manager and the Compliance Officer if a conflict of interest cannot be avoided.
- We pay particular attention when hiring employees who are, or have been, public officials or government officers, in accordance with US regulations on the hiring of former government employees.

## **ANTI-MONEY LAUNDERING**

### **SODERN AMERICA does not tolerate money laundering.**

- We are committed to complying with all applicable anti-money laundering laws;
- We only do business with reputable customers whose activities are lawful and are carried out with funds which, to the best of our knowledge, are of legal origin.
- We only do business with reputable third parties whose activities are lawful and are carried out with funds which, to the best of our knowledge, are of legal origin.

## **FAIR COMPETITION**

### **SODERN AMERICA is committed to ensuring fair competition.**

- We believe in fair competition and must operate in strict compliance with applicable anti-trust laws and regulations which prohibit agreements or conduct that could restrict or distort competition.
- We do business accordingly and firmly exclude any agreement, behavior, exchange or disclosure of commercially sensitive information about competitors, customers or suppliers that could restrict or distort competition or trade.

## **COMPLIANCE WITH EXPORT CONTROL TRADE REGULATIONS**

**SODERN AMERICA operates in strict compliance with export control laws and regulations.**

- We comply with local, national and international regulations, particularly on embargoes, economic sanctions or other trade restrictions imposed on goods, services, software products or technologies, and with export control procedures;
- We ensure that we fully comply with regulations in force;
- We ensure the appropriate government authorizations are granted before any export.

## **COMPLIANCE WITH DEFENSE REGULATIONS**

**SODERN AMERICA is an active player in the defense sector.**

- We take special care to protect all classified information and all information requiring specific levels of clearance;
- Our employees, through regular mandatory trainings, are informed of their duty to report to our Security Point of Contact any incident or misuse, whether real or presumed, involving this information, material or data;
- We strictly manage government-classified information or material requiring specific administrative authorizations;
- Any incident or any real or presumed misuse of information systems must be reported immediately to the Security and Cyber Security departments.
- Any doubts or questions should be submitted to the Security and Cyber Security Points of contact for advice.

## **TREATING SUPPLIERS AND SUBCONTRACTORS FAIRLY**

**SODERN AMERICA recognizes its suppliers and subcontractors as key partners.**

- Our suppliers contribute significantly to the value of our products and therefore play a key role in the satisfaction of our customers.
- We are committed to building fair relationships with our suppliers and subcontractors, and to working with them to achieve mutually beneficial goals.

- We encourage exchange of best practices and synergies whenever appropriate.
- We have a duty to ensure that any disputes with suppliers are resolved with the utmost professionalism, and that we select our suppliers based solely on the interests of our company.
- We expect our suppliers to understand, share and comply with our business ethics principles as set out in our Ethical Procurement Policy.
- Suppliers may be required to demonstrate the application of those principles, including business ethics, anti-corruption measures, human rights, working standards and environmental responsibility.

## **MAINTAINING TRUSTING RELATIONS WITH THE GROUP**

### **SODERN AMERICA is an integral part of ARIANEGROUP.**

While ensuring the confidentiality of our customers' data and our business interactions, we communicate openly with our shareholders and other entities of the ArianeGroup, and share information about our activities and objectives in a spirit of transparency.

## **PROTECTING ASSETS AND INFORMATION**

### **PROTECTING ASSETS AND CONFIDENTIAL INFORMATION**

#### **SODERN AMERICA expects employees to treat all items entrusted to them in a professional, safe, ethical, legal and productive manner.**

- The protection of our assets, skills, confidential information and intellectual property is an essential part of doing business to remain competitive.
- Access to confidential information shall be strictly on a "need to know" basis and subject to strict confidentiality obligations.
- Confidential information may only be communicated to colleagues or to officially authorized third parties who request it for legitimate business purposes or when it is required by law.

We are all responsible for securing and protecting SODERN AMERICA's intellectual property at all times.

## ACCURATE RECORDKEEPING

### **SODERN AMERICA maintains accurate records at all times.**

- Our customers, shareholders and other stakeholders rely on the precision and accuracy of the information contained in our documents. Therefore, we must ensure that we provide accurate, up-to-date, complete, correct and understandable information.
- When preparing financial documents, SODERN AMERICA's internal control procedures must be followed and all communication with statutory auditors must be transparent.
- No one shall create or participate in the creation of documents that may mislead readers or conceal any unlawful activity.
- Records must be kept and destroyed in accordance with data retention periods in the United States and internal procedures.

## PROTECTING THIRD PARTY INFORMATION

### **SODERN AMERICA protects its customers, suppliers and partners confidential information.**

- As a trustworthy partner, we must treat the information of third parties as confidential at all times and abide by the terms of their confidentiality requirements and with all applicable laws and regulations.

Access to government-classified information requires specific authorizations according to its level of sensitivity. Any exchange or transmission of classified information or material must strictly follow the applicable security process. Any incident of misuse real or presumed must be immediately reported to the Security Officer.

## INSIDER TRADING

### **SODERN AMERICA does not tolerate insider trading**

- No information likely to influence the price of shares in our shareholding chain may be disclosed until it has been made public.
- Employees are not permitted to buy or sell shares of SODERN AMERICA, any entity part of ARIANEGROUP, or any customer or partner entity in violation of insider trading laws and regulations.

- Employees are not permitted to share internal or privileged information with third parties, including colleagues, family members and friends.
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## **INTERNAL AND EXTERNAL COMMUNICATION**

The reputation and notoriety of SODERN AMERICA are two crucial assets in our development strategy.

External communication and raising SODERN AMERICA's profile among professionals, students, recent graduates or simply enthusiasts who have a connection with our sector of activity, contributes to achieving this objective.

Social media, the website, press relations and other resources help to raise awareness of SODERN AMERICA, promote our products in France and abroad, recruit talent and develop a dynamic image on a local scale. As ambassadors for SODERN AMERICA, our employees are expected to act in accordance with our principles - in particular with regard to information to be protected. Any doubts should be referred to the Communications Department, which is in charge of matters relating to our exposure, including the communication of information on SODERN AMERICA's official social media accounts.

## **SOCIAL AND ENVIRONMENTAL RESPONSIBILITY**

### **SUSTAINABILITY AND ENVIRONMENTAL AWARENESS**

**SODERN AMERICA takes sustainability into account at every stage.**

- We have a collective responsibility to protect the environment, and achieve sustainable development;
- Environmental imperatives are taken into account in all our decisions from day 1;
- All our choices relating to facility management, waste management, manufacturing procedures, and even paper management take the environment into account;
- We strive to reduce our carbon footprint and encourage our partners and suppliers to do the same;
- We comply with all applicable environmental laws and regulations;

- All our employees undertake to inform their direct manager and the Health, Safety and Environment Officer of any hazardous situations that could have harmful consequences for the environment.

## **SAFE AND DIVERSE WORK ENVIRONMENT**

### **SODERN AMERICA has a zero-tolerance policy for bullying and discrimination.**

- Each individual has an inherent right to a safe work environment free from discrimination and bullying.
- We encourage employee innovation and engagement and are committed to maintaining high standards of quality, health and safety. We encourage continuous employee involvement and empowerment at all levels and we foster trust across teams.
- We believe that fully respecting the employee rights creates a collaborative and trusting work environment which is conducive to innovation, a key driver of our competitiveness.
- We respect the dignity and privacy of each employee.
- We do not tolerate any form of harassment in the workplace, whether physical, visual or verbal.

New technologies are changing our ways of working. The use of artificial intelligence at SODERN AMERICA will be guided by our ethical values and, more broadly, by the fundamental principles of respecting human beings and safeguarding individual liberties.

## **NURTURING TALENT AND FOSTERING GROWTH**

### **SODERN AMERICA places excellence as a top priority.**

- Our recruitment policies aim to attract and retain the best talents by striving towards excellence at every stage;
- We encourage constant engagement and feedback from employees at every level of the company;
- Career development opportunities are offered to employees based on their growth potential, past performance, achievements and engagement, and their hardworking spirit.
- Employees are encouraged to develop innovative solutions for our products, services and business models.

## **ENCOURAGING OPEN DIALOGUE**

**SODERN AMERICA fosters a safe and open environment for dialogue and meaningful exchange.**

- We encourage open dialogue with our employees based on trust and mutual respect.
- Employees are strongly encouraged to communicate openly, to ask questions or express concerns.
- Managers are encouraged to listen and to address all questions and concerns that are brought to them.
- We also encourage all employees to report any situation or behavior that is contrary to the principles of this Code of Ethics through the ARIANGROUP alert portal which is communicated to all employees.

*Please note that this Ethic Charter is not intended to prohibit or infringe on any federal, state or local law, including an employee's rights to discuss wages, hours, working conditions, or other terms and conditions of employment or to otherwise engage in protected concerted activity.*