

ETHICS CODE

Matra Électronique
SOLUTIONS PROVIDER



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MESSAGE FROM THE DIRECTION



David POLITZER,
Managing Director



MATRA ELECTRONIQUE must be **an irreproachable company both in terms of innovation and in relations with our customers and partners.** We must constantly display ethical behavior and fight against all forms of corruption.

All of our employees are responsible for driving our values and principles to represent the ethics of MATRA ELECTRONIQUE.

The objective of this Code of Ethics is to **define the ethical principles and values of MATRA ELECTRONIQUE.** It is on this basis that we wish to transmit to our collaborators and to apply the ethical vision of MATRA ELECTRONIQUE.

We therefore wish to ensure that our business is respected and conducted in accordance with legal and regulatory standards.

We cannot tolerate behavior that is equivalent to corruption and we will apply **the principle of zero tolerance.**

That why we encourage each of our employees to question and/or report any act contrary to our Code of Ethics and our anti-corruption policy, but also any act contrary to the laws and regulations in force.

We will guarantee that every employee can speak without fear and risk of reprisals.

Each of you is an important player in the application of our principles and values and we believe strongly in your investment.

We thank you for your commitment to making our values and principles live through you. This investment will be the result of our present and future success.

Let us work with a feeling of trust within MATRA ELECTRONIQUE but also with our customers and partners.

With your help, we will continue to make MATRA ELECTRONIQUE a company with great ethical, ethical principles and for which we are honored to work.



/ Our values

PASSION / EXCELLENCE / SKILL / TEAM SPIRIT /



INTRODUCTION

Why this Code?

Responsible and exemplary conduct of our business is fundamental to our reputation and future business success.

This Code of Ethics is **a tool that will help us achieve this goal** by establishing the ethical principles that underlie our values and actions, and by describing the behaviors expected of each of us.

The implementation of this Code is based on the rules and procedures defined both at the Group level and at the level of our national companies. The most important are referenced in this Code for possible consultation for more detailed information or guidelines. However, everyone is invited to refer to the various policies and procedures relating to their functions, available in the MATRA ELECTRONIQUE Quality Management System.

Who does this code apply to?

The Code of Ethics applies **to all MATRA ELECTRONIQUE personnel**, regardless of their workplace or function. It is the responsibility of all of us to conduct our activities with loyalty and integrity, to understand the Code of Ethics and to refer to it regularly, in order to be fully aware of the provisions that apply specifically to our function. In case of doubt or question, it is imperative that everyone refer it to their supervisor or to the Compliance Officer.

The managers of MATRA ELECTRONIQUE have responsibilities that go beyond simply complying with this Code. Managers are required to promote MATRA ELECTRONIQUE's ethical rules and to disseminate or communicate effectively the principles set out in this Code and the policies and procedures applicable to their field of activity, to all employees connected with them. They must also be prepared to answer questions about the Code of Ethics and to create a favorable working environment in which employees are encouraged to ask questions or express their concerns.

Awareness and training

The Code of Ethics is accessible via the MATRA ELECTRONIQUE intranet. It is also available on the public website of MATRA ELECTRONIQUE. **Training and awareness-raising are regularly organized, particularly among those most at risk.** Finally, additional information is available on the intranet

The Legal Service, the Human Resources Department, the Compliance Officer and the Compliance Officer Assistant are available to all employees to answer their questions.

Consequence of non-compliance with this Code

It is the responsibility of each employee to ensure that his or her conduct and that of his or her teams are in full compliance with the Code of Ethics. Non-compliance with the Code can have **serious and lasting consequences on the reputation, business relations and financial situation of MATRA ELECTRONIQUE.**



In the event of an infringement of one or more of the provisions of this Code, MATRA ELECTRONIQUE reserves the right to implement the disciplinary procedure provided for by the rules of procedure of MATRA ELECTRONIQUE.

Such offenses may result in penalties for their perpetrators, up to dismissal.



OUR PRINCIPLES OF ACTION

Comply with laws and regulations

Our reputation is based on the principle of integrity and respect for laws and regulations, in our national countries as well as in the export countries where we operate.

It is our individual responsibility to know the laws, regulations and obligations related to our function. Violation of these laws may be subject to civil and criminal sanctions. Any activity that could lead to MATRA ELECTRONIQUE in an unlawful practice is strictly prohibited.

Commit to integrity

The purpose of the Code of Ethics is to **define the principles that will help us to fulfill our commitment to integrity in our daily tasks.**

It is our individual responsibility to scrupulously observe this principle. No performance objective may be imposed or accepted if its achievement implies a departure from the ethical principles of the company as presented in this Code.

Seek advice and express concerns

The Code of Ethics cannot cover all the situations that we may face in the performance of our duties. Indeed, we may find ourselves in a situation that we are not sure how to resolve properly. In this case, we can seek advice and assistance in a number of ways, including **by contacting our direct supervisor, or any other person in the Legal Department, Human Resources Branch, Compliance Officer or Compliance Officer Assistant.**



In addition, if, after having so requested advice and assistance, an employee still believes that a violation of this Code or of the applicable laws and regulations has occurred, he may address his concerns to the following address:

[Ligne d'Alerte Matra-Electronique](#)

This alert will be dealt with in a serious and fair manner under the conditions laid down in the internal "Alert Line and Handling of alerts" procedure

MATRA ELECTRONIQUE undertakes not to leave any questions unanswered. Finally, MATRA ÉLECTRONIQUE prohibits any reprisals against employees who have expressed their concerns in a disinterested and good faith manner.

+ INFO

Alert Line and Report Processing Policy.

Reference: RJUR000004

DRIVING OUR BUSINESS



Customers

We are committed to treating all our customers honestly and fairly, regardless of the size of their business, and to always honor our contractual commitments. We must provide our customers with high-quality and safe products and services that meet their expectations.

Quality and safety are two fundamental values of MATRA ELECTRONIQUE and we must respect all control standards, including applicable laws and regulations and our internal control procedures guaranteeing our customers the provision of products and services of this high level of safety and quality.

Vendors

Supplier action plays a large part in the value of our products and plays an important role in customer satisfaction. **We must encourage ethical relations with our suppliers and ensure that they are treated fairly and equitably.**

The choice of goods and services to be provided must be based on criteria of ethics, price, quality, performance, delivery times and suitability for the needs.

Fair competition

We must always act with probity when we are competing on deals and when we select suppliers. **The principles of honesty and integrity must guide our dealings with customers and suppliers,** particularly during the prospecting and contract negotiation phases. **We must scrupulously respect competition and antitrust laws.**

Corruption and influence peddling

MATRA ELECTRONIQUE rejects corruption of any kind, in all circumstances, whether public or private, active or passive, direct or indirect, and applies a zero tolerance principle.

MATRA ELECTRONIQUE implements a comprehensive anti-corruption program to which its stakeholders must comply.

MATRA ELECTRONIQUE fully adheres to French law n° 2016-1691 on transparency, the fight against corruption and the modernization of economic life known as "Sapin II".

+ INFO

Anti-Corruption Policy
Reference: RJUR00002



Gifts, invitations and business lunches

MATRA ELECTRONIQUE is committed to ensuring that all business decisions, whether made by us, our customers, suppliers or other business partners, are based solely on relevant criteria such as the competitiveness, performance and quality of the products and services offered. **Business gestures, such as gifts, invitations and business lunches offered or received from customers, suppliers or other business partners, must reflect normal business relationships and cannot in any way influence, or give the impression of influencing, a business decision.**

Gifts, invitations and business lunches should never be given or received for the purpose of bribery or influence peddling. Reasonable attitude, common sense and prudence are the order of the day in this type of situation and it is our duty to always respect our internal procedures and the laws and regulations in force.

The nature and amount of gifts and invitations received or offered must be submitted for approval in accordance with the "Gifts, Invitations and Business Meals" policy and recorded in the company's internal registry established for this purpose. **Gifts of a monetary nature or hospitality marks not related to business relations are not allowed under any circumstances.**



Examples

Q: One of our suppliers invites me to a sporting event. May I accept this invitation?

A: Events with suppliers are an opportunity to strengthen our relationship with suppliers and to maintain the business relationship. Acceptance of such an invitation is not per se prohibited, provided that it is part of the established relationship between MATRA ELECTRONIQUE and its partners, does not influence a commercial decision-making process and that the value of the invitation so accepted remains at a reasonable amount and is subject to a request for approval in accordance with the "Gifts, Invitations" Policy and business lunches". If in doubt, refer to the Compliance Officer or Assistant Compliance Officer at compliance.officer@matra-electronique.fr

Q: When traveling abroad to negotiate a contract, one of our local partners invites me to extend my stay and visit him at his secondary residence. May I go?

A: Such an invitation is not directly part of the business relationship and could put you in a difficult position, especially if contract negotiations are under way. Thank the partner for the invitation and politely decline his proposal. Report this event to the Compliance Officer or Assistant Compliance Officer who can provide you with more details on the internal procedure for invitations.

+ INFO

Gifts, Invitations and Business Meals Policy
Reference: RJUR000003

Donations

Donations in the name of MATRA ELECTRONIQUE to public or private bodies may be authorized insofar as they comply with all applicable laws and regulations. **Any decision to involve the company in donations to associations or charities is subject to the prior agreement of MATRA ELECTRONIQUE and must be duly registered.**

Sponsorship

Sponsorship is part of the marketing and communication strategy. It is authorized subject to compliance with applicable laws and regulations. **Decisions to engage the company in a sponsorship transaction are subject to the prior agreement of MATRA ELECTRONIQUE and must be duly registered.**

+ INFO **Donation and Sponsorship Policy**
Reference: Annex 1 of the anti-corruption policy ref RJUR00002

Business relations and other alliances

When dealing with a business relationship, **MATRA ELECTRONIQUE pays particular attention to the ethical aspects of the business**, in order to ensure that the ethical principles of the companies concerned are in line with its expectations in this regard.

Conflicts of interest

A conflict of interest consists of a set of facts where the personal or financial interest of a person may conflict with his role within MATRA ELECTRONIQUE and therefore with the interests of society. **MATRA ELECTRONIQUE employees, trainees and apprentices must declare their conflicts of interest.**

+ INFO **Conflict of Interest Management Policy**
Reference: Annex 2 of the anti-corruption policy ref RJUR00002





Facilitation payments

The so-called "facilitation" payments **are unofficial payments**, of a small amount, to public officials in low-level positions, in order to obtain or speed up the execution of routine administrative formalities.

Public officials may be government officials (including government officials) or public servants (members of international organizations, ambassadors, judges, police or gendarmerie officers, local, national and international elected officials). **MATRA ELECTRONIQUE prohibits making such payments in all the countries in which it operates.**

Money laundering

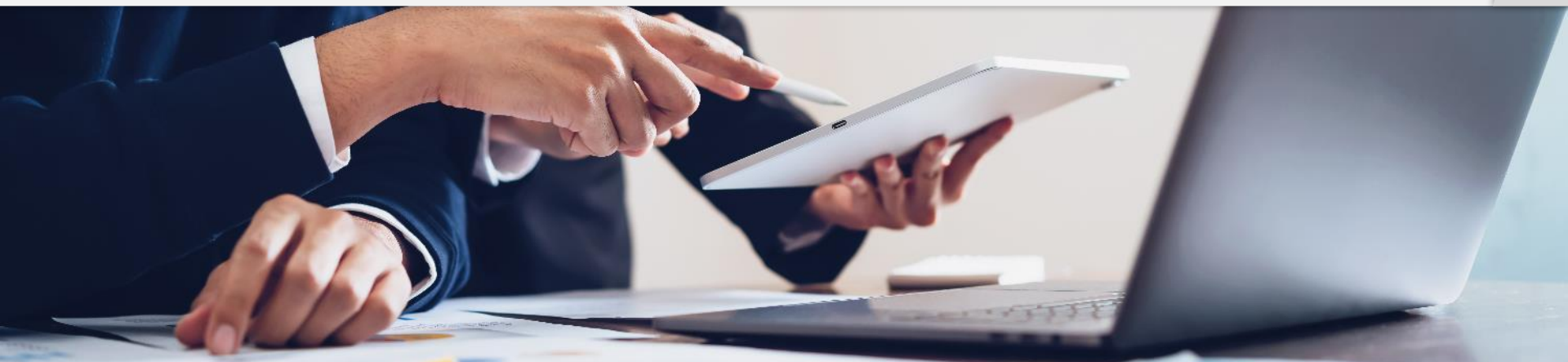
Money laundering is a **process of concealing the origin of funds derived from illegal activities**. In accordance with the laws governing money laundering, MATRA ELECTRONIQUE undertakes to work with reputable trading partners.

Each of us must be vigilant about how payments are made to detect any irregularities, particularly with partners whose behavior in the course of their activities may arouse suspicion.

Financing of political activity

The policy of MATRA ELECTRONIQUE is not to make any financial or in-kind contributions to political organizations or parties, or to political personalities.

MATRA ELECTRONIQUE respects the right of its employees to engage individually in local political and civic life. Such participation must be made on an individual basis, on their own time and at their own expense. The employees of MATRA ÉLECTRONIQUE must clearly separate their personal political activities from their mission within the company in order to avoid any conflict of interest.



Export Control

We must comply with all laws and regulations governing our export and import activities for products, services and information. Failure to comply with these regulations exposes the company (and individuals) to fines, legal action and the export ban.

The undertaking is responsible for obtaining from the competent authorities all the necessary authorizations for the export of its products and for informing its employees who will thus perform their duties within a clearly defined framework.

Persons involved in their activities within MATRA ÉLECTRONIQUE must be familiar with the policies and procedures of MATRA ÉLECTRONIQUE applicable to the processing of goods, technologies, data and services that may enter or leave the country.

WORKING TOGETHER



Protection of employees

MATRA ELECTRONIQUE makes every effort to ensure the protection of its employees, whatever their place of work. MATRA ELECTRONIQUE informs them of the risks and defines the internal procedures to be followed.

We need to keep abreast of the information disseminated and updated by the company, especially in the event of business travel.

Treat everyone with respect

It is up to each of us to treat others with respect. MATRA ELECTRONIQUE intends to create an environment where employees can express their opinions freely, professionally and constructively. MATRA ELECTRONIQUE does not tolerate any form of humiliation, harassment - sexual, physical or moral - coercion, bullying or any other offensive conduct.

We are committed to complying with laws and regulations prohibiting any form of discrimination in employment or during the employment relationship.

Diversity and equal opportunities

MATRA ELECTRONIQUE firmly believes that diversity is the strength of the company.

The recruitment process shall be based exclusively on the applicant's experience, qualifications and skills, and remuneration shall be determined solely on the basis of the employee's professional contribution to the undertaking.

Career management

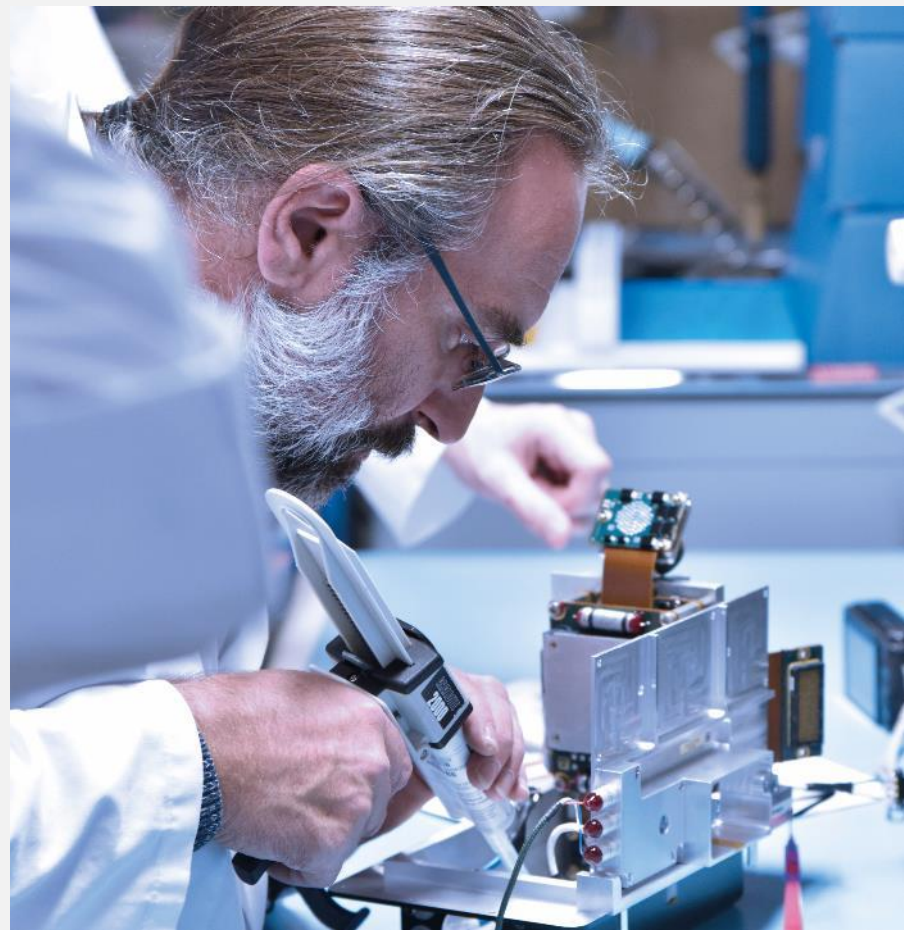
MATRA ELECTRONIQUE intends to promote the personal development of its employees, in particular through regular individual interviews with their supervisor. These interviews allow us to specify the skills required, the results obtained and the career development according to the individual needs and aspirations as well as the requirements of the company.

Training programs and collaborative working methods also contribute to this development.

Social relations

MATRA ELECTRONIQUE respects the right of each of us to form or join a trade union or an organization of workers and to organize ourselves to participate in collective bargaining.

MATRA ELECTRONIQUE respects the role and responsibilities of the social partners and is committed to communicating and negotiating openly with them on matters of collective interest.



PROTECT PROPERTY AND INFORMATION

Protect MATRA ELECTRONIQUE and third party assets

We must do everything we can to protect the property of MATRA ELECTRONIQUE. The latter must in no case be used for unlawful purposes or unrelated to the business of the undertaking. **We must not appropriate any property of MATRA ELECTRONIQUE for our personal use or make it available to third parties for use unrelated to the activities of the company.**

As part of their professional relations with MATRA ELECTRONIQUE, our customers, suppliers and other partners may entrust to the company confidential information of which they are the owners. To be a trustworthy partner, we must treat third-party information with the same care as company information, and refrain from communicating it to unauthorized persons.

Classified information

Due to the nature of its products and services, MATRA ELECTRONIQUE produces and processes classified information. We must be aware of and comply with applicable MATRA ELECTRONIQUE policies and established laws and regulations governing the processing of this type of information. It should be recalled that the latter are generally much stricter than those governing the processing of unclassified information.

Access to classified information requires specific authorizations according to their level of sensitivity. Any exchange or transmission of classified information or material shall be in strict compliance with the applicable security procedures.

Intellectual Property

Intellectual property rights, MATRA ELECTRONIQUE must be protected. **It is the duty of all of us to preserve the property of MATRA ELECTRONIQUE.**

We must also respect the intellectual property rights of third parties and never infringe them, for example by derogating from copyright laws or by downloading software without the permission of their owners.





Protection of personal data

MATRA ELECTRONIQUE pays the utmost attention to the protection of personal data, in accordance with existing laws and regulations in this field.

Access to personal data shall be limited to persons whose duties and responsibilities so warrant, on a case-by-case basis. **MATRA ELECTRONIQUE does not, as a matter of principle, communicate personal data to third parties**, unless necessary for the proper functioning and/or management of the company and if authorized by the law and regulations in force.

For all inquiries about your personal data you can contact our Data Protection Officer at the following address: dpo@matra-electronique.fr

+ INFO

Matra Electronique Computer Charter

Maintain the accuracy of our data

MATRA ELECTRONIQUE, its shareholder and its business partners rely on the accuracy of the information contained in our files. We are therefore required to ensure that the data we provide are accurate. This rule applies to all corporate documents.

Our accounting records and financial statements must comply with internal control procedures. **We must not create or participate in the creation of documents whose purpose would be to deceive the reader or conceal any objectionable activity.** This means, in particular, that we must not under any circumstances make or use false information, provide misleading information or omit to record certain data.

We are required to keep company records in accordance with the data retention rules imposed by law and our internal procedures. Any question concerning the length of time a document is kept or the appropriate method of destruction should be addressed to a dedicated contact or a superior officer.

Avoiding insider trading

Many countries have enacted insider-trading laws. In accordance with these laws, we must not buy or sell any securities of a company if we have inside or inside information about the company. This rule applies to the securities of our shareholders as well as those of our customers, suppliers and partners whose companies are listed on the stock exchange.

In addition, **we must not disclose inside or inside information to third parties, including our colleagues, family members or friends.**

Communication, media relations and use of social networks

Media relations are the responsibility of the Communication Department of MATRA ELECTRONIQUE. Except with the prior agreement of the company, **no employee shall be permitted to represent the company, to express opinions or opinions or to broadcast information in the media on behalf of MATRA ELECTRONIQUE.** This rule applies to all types of communication channels, including social networking web platforms such as web site forums, blogs or 'chats'.

All MATRA ELECTRONIQUE materials used to disseminate information in the media; social networks... must be validated by the Communication Service and, if applicable, the Human Resources Directorate. These media must meet MATRA ELECTRONIQUE graphic standards and be archived.



CORPORATE SOCIAL RESPONSIBILITY



Protection of fundamental freedoms and human rights

MATRA ELECTRONIQUE ensures respect for fundamental freedoms and human rights.

MATRA ELECTRONIQUE fully subscribes to international instruments that enshrine the prohibition of forced labor, the elimination of all forms of child labor, the right to dignity at work, freedom of association and freedom of expression, assembly and association. These principles are enshrined in the ILO Fundamental Conventions, the 1966 United Nations Covenants on Civil and Political Rights (ICCPR) and on Economic, Social and Cultural Rights (ICESCR), the United Nations Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights and the "Declaration of Human and Citizen Rights" in French.

MATRA ELECTRONIQUE is committed to respecting these fundamental principles with regard to its employees, suppliers and service providers, its customers and to guaranteeing them all a healthy climate, free from any threat or violence.

We are committed to being vigilant in identifying and preventing the direct or indirect negative impacts of our activities on human rights, fundamental freedoms, human health and safety. We pay special attention to the rights of vulnerable people in the countries in which we operate.

We integrate the protection of fundamental freedoms and human rights in particular in our buying and selling procedures.



Environmental protection

MATRA ELECTRONIQUE ensures that its activities do not cause environmental damage.

We need to promote eco-efficiency across all our activities by working to reduce our carbon and environmental footprint.

Finally, as employees of MATRA ELECTRONIQUE, we are all invited to participate in this collective effort and more generally to adopt more ecological behaviors, in particular by recycling our waste and using resources in a sustainable way.

Health and safety

MATRA ELECTRONIQUE is committed to seeking the highest level of demands in terms of the health and safety of people and goods in the workplace. MATRA ELECTRONIQUE strives to implement the necessary programs, training and internal controls in order to constantly promote safe working methods.

We need to familiarize ourselves with and respect all the health and safety policies and procedures in place within the company.



For more information

compliance.officer@matra-electronique.fr