

Code of Conduct

1- Preamble

iXblue stands as a global leader in the design and manufacturing of innovative solutions for inertial navigation, subsea acoustic positioning and imagery, photonics, mechatronics, marine works as well as hydrographic and oceanographic survey markets. It offers advanced technology solutions to Defence & civil customers in many countries around the world and operates on a daily basis in a globalized and complex environment with exposure to various cultures, local business behaviours, complex legislations and fierce competition.

Considering iXblue's current size, growth and numerous challenges, it therefore appears necessary to define the reference framework within which all practices, actions and commitments must be placed to ensure that ethics are part of iXblue's global performance.

iXblue adheres to national and international initiatives and instruments supporting ethical behaviour in business conduct, including the ten principles of the UN Global Compact (as reminded in Appendix A), which are now included in the policies of our major customers and passed down through their supply chain.

In line with our values, this *Code of Conduct* establishes the rules governing our behaviour and actions and expresses our determination to play a responsible part in the global economic arena. It does not replace national and international legislations but supplements them where necessary. These rules shall however be binding even if applicable national or international laws call for more lenient standards.

The rules set out in this *Code of Conduct* should be systematically applied not only by all companies forming the iXblue Group (referred to hereafter as iXblue), their employees and managers but also by their main suppliers, their subcontractors, their consortium co-contractors, and their commercial intermediaries (all referred to hereafter as Business Partners) in performing their activities for iXblue.

iXblue reserves the right to vary the terms and conditions described in this *Code of Conduct*. Such changes shall be communicated to any company of the group, employees, managers and Business Partners.

The executive and line management shall always be a proactive driving force for embedding the rules through iXblue's organization and supply chain, from the strategic planning of activities to their day-to-day operational implementation.

2- Compliance with all applicable laws and regulations

iXblue always acts in compliance with applicable national and international laws and regulations relating to the countries in which it is established or in operation, in particular but not limited to anti-bribery laws, competition laws and export control regulations.

iXblue expressly requests its employees and managers as well as its Business Partners to do the same in performing their activities for iXblue.

Considering the special nature of most of iXblue products and involvement in Defence activities, particular attention shall be paid to complying with the provisions relating to export controls, to international embargoes and sanctions and to national security.

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3- Customers

With the aim of building long-term relationship, customer satisfaction is a top priority for iXblue. Whatever their direct or indirect contribution to achieving this objective is, every employee or manager shall:

- listen closely to customer needs and expectations,
- ensure requirements and regulations applicable to public procurement are always properly fulfilled,
- provide clear, appropriate, complete, honest information that leads to effective communication based on mutual trust and respect,
- have an ongoing concern for the quality and reliability of the products and services provided, including as related to the prevention of the use of counterfeit parts and materials,
- fulfil the commitments made, particularly relating to the quality, punctuality and security of deliveries and services,
- ensure sincere communication, support and follow-up over the long term.

iXblue respects customers' intellectual property rights, fulfils its obligations of confidentiality and is caring for any information, documentation or property that they may have handed over to us.

Furthermore, iXblue makes every effort to ensure that it meets its customers' ethical requirements.

4- Human resources management

iXblue's performance and sustainable development depend mainly on its employees, their commitment and motivation, their ability to innovate, work effectively as a team and show evidence of creativity and reactivity.

The well-being and quality of life at work and the professional fulfilment and personal development of each employee are essential to iXblue's overall success.

The management shall maintain good working conditions with a spirit of trust, mutual respect and dialogue in recruitment, professional development and career management, vocational training, knowledge and skills development and compensation.

In addition, consistent with the principles of the UN Global Compact, management shall ensure:

- equality of treatment, respect for diversity and non-discrimination,
- respect for the individual, including matters relating to privacy, personal information and proper protection of such information,
- prevention of any kind of harassment or other abusive conduct,
- determination to always provide an appropriate, secure, safe and healthy working environment, wherever employees would be performing their assignments,
- zero tolerance of retaliation of those who, in good faith, report possible legal, ethics and/or compliance violations.

Finally, iXblue senior management undertakes, in a spirit of constructive dialogue, to promote cooperation with employees and their representatives and to provide them with regular, quality information adapted to the iXblue's challenges, objectives and results.

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5- Staff

As part of his/her function, every employee or manager contributes to the performance, development, image and reputation of iXblue, through his/her work or through his/her interaction with customers, Business Partners, authorities, administrations, media or civil society.

In his/her relation with his/her colleagues, superiors, subordinates and vis-à-vis iXblue in general, every employee or manager shall act with loyalty and honesty and shall honour the commitments he/she has made.

Each employee or manager shall have an ethical conduct and shall act in accordance with the values and principles of iXblue internal Charter.

iXblue's internal codes, policies, rules and procedures shall always be applied and followed by all employees and managers, who shall also act with respect for the principles of compliance and continuing improvement relating to our different management systems.

Each employee or manager must take personal responsibility for always acting according to the various requirements set forth in this *Code of Conduct* and is expected to raise any legal or ethical issues or concerns without fear of retaliation.

Failure to comply with applicable laws and regulations or with internal codes, policies, rules or procedures may result in disciplinary action for the persons involved and/or in legal proceedings and penalties, including civil or criminal prosecution, for both the persons involved and iXblue.

6- Business Partners

As a general rule, iXblue requests its Business Partners to apply to themselves and to their own supply chain all the rules of conduct as herein defined in working for or acting on behalf of iXblue.

In particular, but not limited to, Business Partners shall:

- comply with all laws and regulations applicable to their own business,
- behave so as to ensure a mutually beneficial and long term relationship with iXblue, consistently with contractual dispositions agreed with the same,
- maintain an open, sincere and transparent dialog with iXblue,
- manage its own staff, its own supply chain and its environmental footprint in line with the ten principles of the UN Global Compact,
- prohibit all forms of corruption, active or passive, influence peddling, fraud or laundering of criminal activities, consistently with all applicable laws and regulations as well as all dedicated contractual dispositions agreed with iXblue.

Commensurate with the size and nature of their business, iXblue expects its Business Partners to have in place management systems as well as corresponding policies and procedures to support compliance with laws, regulations and other expectations herein defined.

7- Competition

iXblue undertakes to act towards its competitors in such a way as to promote a spirit of free and fair competition, to refrain from distorting competition and agrees not to make any statements, behave in

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certain ways or carry out actions which are based on unfounded rumour or which may be considered to be defamatory.

iXblue expects its employees and managers to report to their hierarchy, in a confidential manner, any fact of unfair competitor behaviour they are aware of when such behaviour harms iXblue's interests.

8- Integrity and probity

iXblue requests every employee or manager to act with honesty, integrity and fairness.

iXblue prohibits all forms of corruption, active or passive, influence peddling, fraud or laundering of criminal activities. In this respect, every employee or manager shall refuse any solicitation to directly or indirectly grant any public official or private company employee any undue benefits in any form whatsoever in order to favour iXblue through his/her action or behaviour.

Every employee or manager shall ensure that there is never a conflict of interests between their professional activities and their personal environment for any reason whatsoever. If ever such a situation were to arise or become possible, the concerned person shall immediately inform his superior for remedy.

An employee or manager's strictly personal interest shall never influence his/her working activities. Any form of personal enrichment or benefit gained from these activities, directly or indirectly, is totally prohibited.

The giving and acceptance of small gifts and invitation is allowed but strictly regulated, in accordance with internal rules and procedures.

9- Protection of assets

In their daily work, every employee or manager shall be caring for iXblue's properties and shall protect its intangible assets.

Particular attention shall be paid to confidential information concerning iXblue's technologies, processes and know-how, projects, products or employees as well as commercial, industrial, strategic or financial operations. This information shall always be properly protected and shall never be disclosed or made public without the agreement of the individuals authorized to do it; similarly, confidential or sensitive information shall never be disseminated inadvertently (public places, shows, seminars, social networks ...).

Any situation which would harm tangible and intangible assets shall be reported to the hierarchy.

No employee or manager shall embark on any action that may in some way be damaging to iXblue vis-à-vis:

- its obligations or commitments,
- its image and reputation,
- the obligation of neutrality (political, religious and philosophical) in the working environment,
- its activities, including the observation of a strict duty of loyalty and non-competition towards iXblue.

10- Sustainable development

iXblue seeks to ensure that all its actions, on its sites and as part of its operations, are in keeping with an environmental protection policy that promotes a sustainable approach to its environmental footprint.

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In compliance with the applicable standards and regulations, substances, products and industrial processes used in operations are carefully selected for minimizing the consumption of energy or resources and the production of wastes. Adequate measures shall be taken to reprocess all types of wastes and to prevent all forms of pollution.

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APPENDIX A

The Ten Principles of the UN Global Compact

Corporate sustainability starts with a company's value system and a principled approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption. Responsible businesses enact the same values and principles wherever they have a presence, and know that good practices in one area do not offset harm in another. By incorporating the Global Compact principles into strategies, policies and procedures, and establishing a culture of integrity, companies are not only upholding their basic responsibilities to people and planet, but also setting the stage for long-term success.

The UN Global Compact's ten principles are derived from the [Universal Declaration of Human Rights](#), the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#), the [Rio Declaration on Environment and Development](#) and the [United Nations Convention Against Corruption](#).

Human Rights

[Principle 1](#): Businesses should support and respect the protection of internationally proclaimed human rights; and

[Principle 2](#): make sure that they are not complicit in human rights abuses.

Labour

[Principle 3](#): Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

[Principle 4](#): the elimination of all forms of forced and compulsory labour;

[Principle 5](#): the effective abolition of child labour; and

[Principle 6](#): the elimination of discrimination in respect of employment and occupation.

Environment

[Principle 7](#): Businesses should support a precautionary approach to environmental challenges;

[Principle 8](#): undertake initiatives to promote greater environmental responsibility; and

[Principle 9](#): encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

[Principle 10](#): Businesses should work against corruption in all its forms, including extortion and bribery.

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