

SAFRAN'S RESPONSIBLE LOBBYING CHARTER

This Code of Conduct applies to Safran Group and all its companies, in France and worldwide.

Lobbying refers to any action carried out by one of the Group's interest representatives, aimed at exercising influence over public authorities or providing them with information, with a view to guiding a political decision¹. The purpose of lobbying is to defend the Group's interests and provide public decision-makers with technical expertise regarding the consequences and practical scope of legislation in force or under consideration.

Designed to defend the Group's interests, lobbying activities are entrusted to people who do not themselves harbor interests that may be in conflict with those of the Group.

Within Safran Group, lobbying activities are placed under the responsibility of the Safran Group Director, International and Institutional Affairs (DG2I).

If one of the Group's companies wishes to carry out indirect lobbying actions via services provided by an external consultant, the Trade Compliance Officer (TCO) of the company in question must be notified to trigger preparation of an approval application for the partner, to be signed by the Safran DG2I (International Trade Compliance Procedure).

Safran undertakes to:

- Comply with the provisions of:
 - French law no. 2016-1691 of December 9, 2016 on transparency, the fight against corruption, and modernization of the economy, in particular, article 25 of said law concerning the declaration of its business interest actions to the French public authorities, via the online registry provided by the French High Authority for Transparency in Public Life (HATVP):
<https://www.legifrance.gouv.fr/eli/loi/2016/12/9/2016-1691/jo/texte>

- The decree of May 9, 2017 concerning the online registry of interest representatives, modifying article 18 of French law no. 2013-907 of October 11, 2013 on transparency in public life:
<https://www.legifrance.gouv.fr/eli/decret/2017/5/9/ECFM1706418D/jo/texte>
- French law no. 2013-907 of October 11, 2013 on transparency in public life:
<https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000028056315>
- The laws and regulations in force in the countries in which the Group operates² ;
- The regulations pertaining to the organizations (trade, employer, professional) with which the Group is called on to carry out lobbying activities, in all the countries in which the Group operates ;
- Declare its lobbying activities to the European Union (name of interest representatives, type of interests defended, budgets allocated) via the transparency register³ g  r   conjointement par le Parlement europ  en et la Commission europ  enne : https://europa.eu/european-union/index_fr ;
- Comply with the Group's Ethical Guidelines (<https://www.safran-group.com/commitments>), in particular Group procedures on "Gifts, hospitality and sponsored trips" and "International trade compliance";
- Enable identification of all lobbying initiatives: Safran personnel and - if applicable - external lobbyists⁴, must clearly state that they are performing an initiative on behalf of the Group when meeting with stakeholders in a lobbying context.

The present Code of Conduct is brought to the attention of all Safran personnel and external lobbyists, who must be aware of its content and notify the DG2I that they have received a copy, pursuant to Safran International Trade Compliance Procedure. Any Safran employee or external lobbyist acting on behalf of Safran who contravenes the present Code will be liable to a disciplinary or contractual sanction. This Code of Conduct is also available online via the Group website.

¹ Article 25 of French law no. 2016-1691 of December 9, 2016 on transparency, the fight against corruption, and modernization of the economy, known as the "Sapin II" law.

² Concerning national regulations, consult the Trade Compliance department of Safran's International and Institutional Affairs Division (DG2I). Contact: tradecompliance@safrangroup.com

³ Declaration on the European Union transparency register is not mandatory.

⁴ Does not apply to industry watch.