

# REPORTING A QUALITY DRIFT, AN UNUSUAL OR NONCONFORM SITUATION THAT COULD DOWNGRADE AVIATION SAFETY

Safran depends on values and ethics shared by all of its stakeholders. Our business is conducted in compliance with the highest standards of honesty, integrity and professionalism. These values and ethics ensure that our customers, employees, shareholders, suppliers, and partners can depend on our commitments.

Our basic values and principles are formalized in the Safran Ethics Charter, available [here](#).

In each of the areas covered by the Ethics Charter, Safran has established a compliance system based on internal procedures, standards, and guides that are regularly updated as part of a continuous improvement philosophy.

For Safran employees, the Group has developed and maintains a document to help them learn and understand the main principles and practices involved: the Safran Compliance Guide, available on the Safran intranet.

If you have any questions about a situation or behavior that could be contrary to the Safran's policies, you are encouraged to report the following situations to the appropriate parties with the responsibilities for the below situations<sup>1</sup>:

- reporting unethical behavior or fraud
- reporting events that may have an impact on flight safety
- reporting computer vulnerabilities

1) In compliance with the provisions of EU Directive 2019/1937 of 25 September 2019 on the protection of persons who report breaches of EU law and in compliance with national legislation on the protection of strategic assets and national security.

### 1. GENERAL PRINCIPLES FOR HANDLING ALERTS AND REPORTS

Except for specific rules on aviation safety or product vulnerabilities described in the chapters on quality and airworthiness, the following rules are applied by Safran when processing reports.

#### a. Governing principles:

##### A good faith approach

- The reporter must act in good faith.
- Good faith is defined as reporting without malice or expectation of personal gain.
- If that is not the case, the reporter may not benefit from protective measures.

##### Protective measures for the reporter

- Provided they have acted in good faith, no disciplinary action or retaliation measures will be taken against persons reporting, even if the facts reported prove to be unfounded after processing or investigation.
- Any direct or indirect retaliation against a Safran employee who has made a report will not be tolerated and may result in disciplinary action against the retaliator, up to and including termination of the employment, in accordance with applicable local law.

##### The identity of the reporter

- It is recommended that employees, temporary workers and external staff who wish to report a situation identify themselves, as their identity will be treated as confidential. However, in compliance with certain local laws, the report may be anonymous.
- Safran is committed to taking all necessary steps to protect the identity of individuals when reporting fraud, unethical situations or crimes. Their identity cannot be communicated to any person or persons subject to the report, except with the express agreement of the individual concerned.
- The information collected during processing will be treated confidentially, subject to legal obligations or proceedings, if any.

##### Collection and storage of personal data

- Personal data is processed based on Safran's legitimate interest in monitoring compliance with the Group's ethics charter, verifying the quality of its products and services and detecting flaws and vulnerabilities in its IT systems and services, in order to take appropriate preventive and remedial measures, if necessary.
- Personal data collected in connection with a report will only be used for the purposes of identifying and processing the information in the report, conducting internal investigations and responding to the report.

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- In this context, and in accordance with applicable regulations,<sup>2</sup> Safran collects:
  - the identity and contact details of the reporter (last name, first name, email address)
  - any other personal data that may be indicated in the report (including from persons outside the Safran Group in connection with the reported vulnerability)
- This personal data is stored at least until after the report is processed and at most until the end of any legal requirements in case of litigation.
- It is only accessible to those who need to know it in the course of investigating the report and processing the situation reported.
- Safran has implemented state-of-the-art physical, logical and organizational measures to protect personal data from loss of integrity, availability or confidentiality.
- If a report concerns a Safran entity located outside the European Union, certain personal data may be transferred to that entity in order to investigate the report and carry out remedial actions, if necessary. This transfer will be subject to the “Binding Corporate Rules - Controller”, available on the Safran internal website.

### Rights of data subjects

- The persons identified during the collection and processing of reports have the right to access, rectify and erase personal data and to restrict or object to its processing, as well as the right to data portability. These rights can be exercised by contacting the Safran Data Protection Officer directly: [safran.dpo@safrangroup.com](mailto:safran.dpo@safrangroup.com)
- Exercising your rights will not result in any discrimination by Safran
- Data subjects may send their request to the French personal data control authority ([www.cnil.fr](http://www.cnil.fr)) or to their national personal data control authority.

## b. Process

### For each alert or report, the internal handling process proceeds as follows:

- assess the eligibility of the alert / report
- acknowledge receipt of the report
- ensure the confidentiality of the whistleblower / reporter and protect the presumption of innocence of the person subject to the report; in this respect, do not release information or documents that could allow the identity of the reporter to be recognized, except with their prior agreement
- inform the relevant departments
- have the whistleblower / reporter complete documentation for the report as needed
- set up the procedures to be conducted (investigation by the department concerned, and if need be by specialized investigators), determine potential precautionary measures, and depending on the result of the investigations, decide on the proper follow-up (closing out the case, preventive, corrective, disciplinary, legal measures, etc.)

2) In particular EU Regulation 2016/679 and EU Directive 2016/680 on personal data protection.

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- define the criteria for closing out the case, and inform the relevant parties when it is closed
- inform the whistleblower / reporter (when possible) and, if applicable, the person subject to the report of the progress of the investigations and the measures taken
- archive case information anonymously

The Compliance, Ethics and Anti-Fraud Committee is kept up-to-date or refer the matter to them. In addition, the Quality Department and/or the Digital and Information Systems Department will be informed when the nature of the report falls within their competence.

## 2. AVIATION QUALITY AND SAFETY

### a. Aviation Safety Policy

Since 2020, Safran has had an Aviation Safety Policy. This policy affirms even more strongly that aviation safety is Safran's top priority, and requires its employees (and anyone working for Safran) to respect the principles of the Safety Management System (SMS), whose objective is to plan ahead as much as possible (be proactive), in order to prevent risks to aviation safety before they even occur.

### b. If you encounter a risk to aviation safety

All Safran employees, as well as customers, suppliers, temporary workers and external staff, are expected to maintain an attitude aimed at guaranteeing and improving aviation safety. When it comes to aviation safety, it is crucial to analyze as many warning signs as possible, as early as possible. Aviation safety requires extreme vigilance.

Have you noticed a deviation, an unusual or non-compliant situation concerning products or processes, the organization or certain behaviors that could lower the expected level of safety? First, please note that various reporting systems are already in place within your entity, whether you are a Safran employee or an outside party working for Safran.

Safran always recommends that you first consult with your management and the usual reporting channels already in place within your entity.

In addition to your organization's internal reporting channels, Safran has set up an «Aviation Safety Hotline» via the following e-mail address: [aviationsafety@safrangroup.com](mailto:aviationsafety@safrangroup.com)

It is open to everyone, whether you are a Safran Group employee, a customer, supplier, a temporary worker or external staff.

**This additional hotline has multiple objectives:**

- First, to report deviations or non-conformities that may require additional support from the Group to be dealt with effectively or when local whistleblowing systems prove to be insufficient

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- To share an experience that could be useful to other employees (within Safran or linked to Safran) in order to prevent its recurrence in a similar context
- To report warning signs<sup>3</sup>.

Emails to [aviationsafety@safrangroup.com](mailto:aviationsafety@safrangroup.com) are processed by a Safran unit that protects the confidentiality of the data transmitted and the identity of the sender.

### Some key points for your statement to [aviationsafety@safrangroup.com](mailto:aviationsafety@safrangroup.com):

- This statement MUST NOT be used for situations involving military products
- Be as precise and explicit as possible. The Safran Group's processing unit will make sure to protect your anonymity if you have requested that your identity not be communicated.
- Report only factual information
- Any statement containing names of persons will not be taken into account

<sup>3</sup>) a warning sign is an event that has no direct and immediate impact on flight safety but which could be a concomitant cause if it's not eradicated.