



# ETHICAL GUIDELINES



At Safran, we believe the meaning of our actions is of core importance. That is why our corporate purpose reflects our identity, values and principles. It is also why ethics are central to the Group's operations.

Ethics are critical for Safran as they define what the company should be. They establish values and principles that apply to all actions, for each and every one of us around the world.

In 2005, we created formal ethical guidelines. Since then, we have continually worked to expand and improve our ethical requirements. Today, we can draw on an adapted compliance system which includes numerous guidelines, internal procedures, and application guides. It creates an environment where not only all Group employees across the world, but also our suppliers and partners, can rally around shared values.

In 2012, Safran became the first public French company to be certified in international corruption risk prevention, before obtaining "Responsible Purchasing" certification in 2014 and "Responsible Supplier Relations" certification in 2017.

Our culture of integrity is also apparent in our new corporate social responsibility (CSR) strategy which includes four pillars, one of which is to aim to "embody responsible industry".

It is vital for everyone to be involved if we are to keep our commitments. Each and every one of us, regardless of our role in the company, branch, or country, must be irreproachable in how they perform their work. No breaches of ethics will be tolerated either at Safran or any of our partners.

Continually striving for excellence is the basis for our Group's strength and is critical for future success. That is why I would like to reaffirm my determination to ensuring that everyone follows the Ethical Guidelines.

Olivier ANDRIÈS  
Chief Executive Officer

A handwritten signature in black ink, appearing to be 'O. Andriès', written in a cursive style.

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# FOREWORD

The Ethical Guidelines formally set out the shared, guiding values and principles of the Group.

They form the basis of the body of policies, guidelines, procedures, standards, codes of conduct and internal guides adopted by the Group in the areas of ethics and good conduct. Each and every one of us, irrespective of our position, entity or geographic area, has a role to play in both promoting and upholding the rules of conduct set forth in the Ethical Guidelines.

The Ethical Guidelines are not intended to replace or revise the laws and regulations in force, but to provide employees with points of reference and guidance in conducting their professional activities in all circumstances.

Therefore, the Ethical Guidelines form part of Safran's compliance policy and are consistent with the Group's core purpose.

In each area covered by the Ethical Guidelines, Safran has developed a compliance system comprising internal procedures, standards and guides that are regularly updated in a continuous improvement approach.

# ADHERING TO FUNDAMENTAL PRINCIPLES

Safran conducts its business activities in accordance with the highest standards of transparency, integrity and professionalism in line with its strong values and ethics shared by all its employees. The Group is a leader in the fight against corruption and a strong advocate of trade compliance. Safran's commitment to act as a responsible business is one of the four pillars of its CSR strategy.

## COMPLYING WITH OUR ETHICAL GUIDELINES

Every employee, irrespective of their location, business line, level of responsibility or Group entity, is asked to familiarize themselves with the Ethical Guidelines, comply with the principles contained therein and, more broadly, ensure their application.

The Group promotes its ethical principles both internally and externally among all its stakeholders.

## UPHOLDING LAWS AND REGULATIONS

In every country where the Group operates, all employees must observe and act in compliance with the applicable international, federal, national and local laws and regulations. Care should be taken, as it may be difficult for employees to understand the regulations in cultural and legal environments that are very different from those in which they have previously worked. When there is a question or there is any doubt, employees should immediately consult with their line management or the Legal Department.

Employees working in a subsidiary jointly owned by a Group company and another company must uphold the laws of the country in which the subsidiary is based and registered, as well as the laws applicable to its shareholders.

Integrity, honesty and transparency should guide all Group employees in their work and interpersonal relations. Employees are expected to deal with customers, suppliers, partners and civil society in general in the Group's interest and in compliance with laws and regulations.

Safran takes care to uphold laws on anti-corruption, competition, import and export control, labor and employment, health and safety, and environmental protection, as well as internationally recognized human rights and fundamental freedoms.

## DUTY OF CARE

The Group takes the most appropriate precautions based on its business activities to identify risks and prevent major breaches of human rights, fundamental freedoms, and environmental and health and safety laws, as set out in its duty of care plan.

These principles guide the Group when making decisions about the structure of its supply chain.

## RESPECTING HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS

Safran does not tolerate any breaches of human rights and fundamental freedoms in its business activities.

The Group does not finance any political parties, and any political activities in which employees may engage must be carried out exclusively outside the workplace and working hours.

Any religious practices in which employees may be involved must be practiced exclusively outside the workplace and working hours, except in the case of a legal obligation.

The principles of tolerance and respect for others apply to both Group employees and to all Group entities in their relationships with their employees.

The Group guarantees equal opportunities for all employees and fosters inclusion through a working environment in which recruitment and promotion are based exclusively on professional qualities and performance.

Safran does not tolerate any form of discrimination, notably based on gender, disability, family status, health, age, sexual orientation, religious beliefs, trade union activity or ethnic, social and cultural background, whether within the Group or in dealings with customers, suppliers, business partners and other external service providers.

The Group ensures that all employees can achieve fulfillment in their work by respecting their diversity and right to dignity and a private life, and by guaranteeing the protection of their health and safety in the workplace.

All Group entities undertake to protect employees' privacy, observe the applicable personal data protection laws and take all the relevant measures required, including in relation to the transfer and hosting of personal data outside of their country of origin.

Any conduct or action that breaches these principles, and in particular any form of psychological or sexual harassment, are not tolerated.

# ENGAGING IN GOOD BUSINESS PRACTICES

## **FAIRNESS AND INTEGRITY**

Every employee must uphold the principles of fairness, discretion, prudence and integrity in their dealings with customers, suppliers and other partners.

The Group does not tolerate any breach of these principles, for any reason whatsoever. Every employee is responsible for upholding and taking action to support these principles, in particular by applying internal regulations and procedures and helping to identify any fraudulent conduct or failure to apply these principles in full. Any situation that seems questionable should be immediately reported to line management or via any other incident reporting channel established for this purpose.

Under no circumstances may employees damage the reputation of the Group or compromise the integrity of its assets, its information systems or any connected information systems owned by partners.

All employees must ensure that they do not expose themselves to any situation (whether due to their own actions or those of their friends and family) in which their interests would be at odds with those of the Group. Employees must report all actual or potential conflicts of interest to their line management or the competent departments.

Considerable caution is also required when purchasing shares, directly or via an intermediary, in the capital of companies doing business with the Group.

## **ZERO TOLERANCE OF CORRUPTION**

Safran, its companies and its employees do not tolerate any form of corruption – whether active or passive, direct or indirect – or of influence peddling in its business relations, interpersonal relations and day-to-day business practices with the public or private sector.

Safran is committed to requiring a high degree of honesty and integrity from its partners. It has adopted a Code of Conduct that sets out and details the various prohibited forms of behavior.

Group companies apply all international conventions on corruption, as well as the applicable anti-corruption laws in force in the countries where they operate.

The Group, its companies and its employees never use a third party to perform any task that they are ethically or legally forbidden from performing themselves. Engaging a third party for the purpose of bribing an individual or legal entity breaches anti-corruption laws. Prior to entering into any contractual relationship with a business partner, Group companies must follow a methodical and documented selection procedure.

All business relationships must be conducted in a spirit of good judgment, discretion and prudence. Business courtesies, such as gifts and hospitality, given to or received from customers, suppliers and other partners are commonly used to build goodwill and maintain good business relationships. However, these courtesies must not exceed a nominal value and may not influence, or give the appearance of influencing, any business decision. Business courtesies are prohibited by law under certain circumstances and in certain countries. Group employees must comply with the laws and regulations that apply in each country where Safran operates.

## **COMPLYING WITH IMPORT AND EXPORT LAWS**

As a global company, Safran purchases goods and services from a diverse group of suppliers. The Group also provides goods and services to customers all over the world. It is therefore critical that the Group strictly complies with all applicable regulations that govern its export activities.

Before engaging in any export activity, Group employees must verify the eligibility of both the delivery location and the recipient. They must also ensure that the entity holds, when applicable, all required licenses and permits, including government authorizations and approvals for regulated products or technologies. This work must be done in conjunction with Safran's export controls organization.

Import activities are also subject to various laws and regulations. It is the responsibility of Group employees to comply with all the applicable standards, as well as to know and comply with the laws and regulations that apply to the related business sector.

Any breach of import and export regulations may have serious consequences for the Group.

## **COMPETING FAIRLY**

As part of its commitment to fair competition, the Group undertakes to strictly comply with all applicable competition laws in the countries where it operates. In general, these laws prohibit agreements or practices likely to restrain or alter competition or trade, such as: price fixing, abuse of a dominant position, bid rigging, allocating markets, territories or customers amongst competitors, and boycotting or discriminating against certain customers or suppliers without legal justification.

The exchange or disclosure of commercially sensitive information relating to competitors, customers or suppliers may also constitute a breach of contractual commitments and the applicable anti-trust laws.

# PROMOTING SOUND AND RIGOROUS INFORMATION MANAGEMENT

## **PROTECTING INFORMATION**

All employees must ensure the protection of all information provided, transmitted or generated in the course of or in connection with the performance of their duties. They must pay particular attention to respecting the related internal rules (particularly in the drafting of documents, emails and letters, during discussions and with regard to information disclosure), as well as the applicable requirements during both written and verbal communication.

## **PROTECTING THE CONFIDENTIAL NATURE OF CERTAIN INFORMATION**

Given the nature of the Group's business activities, all employees have access in the course of their duties to confidential information, which represents a key asset for the Group. Confidential or classified information is sensitive information that must not be disclosed or communicated outside of the Group. The same degree of care must be exercised when handling confidential information entrusted by third parties. Similarly, Group employees may hold information about the national defense and security of a country. Such information is subject to special, strictly regulated safeguards.

Furthermore, as Safran is a listed company, any confidential information classified as "inside information" within the meaning of stock market regulations must remain as such. Any personal use of inside information would constitute insider trading and could expose the employee to both civil and criminal liability.

# REDUCING OUR CLIMATE IMPACT AND PROTECTING THE ENVIRONMENT

## **TAKING THE ENVIRONMENT INTO ACCOUNT**

Today more than ever, protecting the environment is a critical concern for all Group employees.

Safran adopts sustainable performance objectives by taking into account the environmental issues relating to its business activities.

## **COMBATING GLOBAL WARMING**

Climate change sets a global and systemic challenge for aviation. Accordingly, Safran sees climate change as an absolute priority, both in its strategy and relations with its stakeholders. Its strategy and business model are therefore aligned with the objectives of the Paris Agreement.

Safran is geared up to leading the way towards decarbonization of the aviation sector and to developing innovative technological solutions to reduce the greenhouse gas emissions from the use of its products.

Safran also incorporates climate issues into its operational excellence objective, with investments in decarbonizing its industrial processes and initiatives to mobilize its suppliers on reducing their emissions.

## **MAINTAINING A HEALTHY ENVIRONMENT**

As well as addressing climate issues, the Group is striving to reduce its environmental footprint.

Accordingly, Safran is committed to promoting and applying eco-design across the entire product life cycle and to minimizing chemical risks and noise pollution, increasing recycling and reducing the use of non-renewable resources.

# STAKEHOLDER DIALOGUE

## RELATIONS WITH SHAREHOLDERS

The Group ensures that its shareholders, as well as the entire financial community, simultaneously and effectively receive complete, relevant, accurate and precise information in accordance with the regulations applicable to listed companies. It takes particular care to implement international corporate governance standards and principles.

## RELATIONS WITH SUPPLIERS

The Group selects suppliers on the basis of objective criteria and demands high performance from them, in order to ensure that the Group's expectations and those of its customers are fully met. Under no circumstances will the Group use suppliers that breach human rights and fundamental freedoms, in particular by employing children or using forced labor.

With the goal of sharing its commitments with its suppliers and subcontractors, Safran has Responsible Purchasing Guidelines that aim at fostering a lasting relationship of trust and taking into account the social and environmental impacts of its suppliers.

## CUSTOMER AND PARTNER SATISFACTION AND TRUST

As a trusted partner, Safran is committed to acting in the interests of its customers, in order to best meet their needs.

For the Group, the reliability and effectiveness of its products and services are vitally important, in order to help its customers to achieve operational excellence. As such, the Group utilizes all the resources necessary to ensure that its products and services deliver a high level of quality, safety, integrity and reliability.

## RELATIONS WITH CIVIL SOCIETY

In order to affirm its commitment to citizenship, Safran aims to get involved with local communities and contribute to their development, thereby fulfilling its commitment to being at the forefront of innovation to protect citizens.

As part of its commitment in favor of apprenticeships and the employment areas where the Group operates, Safran takes part in initiatives and forms partnerships with research organizations, educational establishments and non-profits, promoting professional integration and training and the spread of innovation.

Safran is well positioned to further develop its civic and socially responsible practices to uphold the public interest and the common good. A number of different initiatives are deployed across the Group's facilities to promote social and professional integration.

### **For more information**

In the event of a question about a given situation or type of behavior or any doubt regarding the appropriate conduct, employees should consult their line management or the Legal Department, the Finance Department, the Internal Control Department, the IT System Security Department, the Quality Department, the Human Resources Department, the Safety Department, the Audit and Internal Control Department, the Ethics and Trade Compliance Department or the Export Control and Customs Department.

Employees may also use the whistleblowing alert system by sending an email to the following dedicated address: [safran@alertethic.com](mailto:safran@alertethic.com).

The whistleblowing alert system is a secure, confidential channel that employees can use to report, anonymously or openly, situations that are likely to breach the principles of the Ethical Guidelines. The system can be used not only by Group employees and temporary staff, but also by customers and suppliers.

*All of Safran's ethics and compliance documents, as well as useful contacts, can be found on the Group's website or on the intranet.*

[https://insite.collab.group.safran/minisites/GroupStandarts/ReferentielOperationnel/Juridique/Pages/GRP-0079-References\\_EN.aspx](https://insite.collab.group.safran/minisites/GroupStandarts/ReferentielOperationnel/Juridique/Pages/GRP-0079-References_EN.aspx)

The content of these Ethical Guidelines can also be found in the GRP-0079.

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**POWERED  
BY TRUST**

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