

Code of Ethics TechnicAtome



Compacts Nuclear Reactors

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TechnicAtome values

The five TechnicAtome values, which are a legacy of the company's history, the foundation of its future success, and serve its performance in the fulfilment of its day-to-day mission, are:

- > **Technical excellence** “Professionals developing high performance, reliable and safe solutions suited to our customers'needs”
- > **Teamwork** “A spirit of solidarity and mutual care that unites us in meeting the company's challenges”
- > **Sense of commitment** “Commitment and responsiveness to our customers”
- > **Integrity** “Conscientiousness, honesty and a sense of responsibility, the pillars of trust”
- > **Agility** “Listening, anticipating and adapting to respond effectively to current and future challenges”

IMPLEMENTATION OF THE CODE OF ETHICS

1



IMPLEMENTATION OF THE CODE OF ETHICS

A copy of this Code of Ethics (“the Code”) is given to every employee within the company at the time of its issue, and to all new employees when they join the company. It is the reference document that everyone should use to check that their behaviour and actions conform to high ethical standards consistent with the promotion of and respect for TechnicAtome’s values.

Everyone must comply with the Code of Ethics, and its implementation should be monitored and supported by the Business Ethics Advisor.

The Business Ethics Advisor is responsible for ensuring the Code is correctly applied. He or she reports independently to the CEO and issues a report each year listing any deviations from the Code and the action taken in response.

In his or her monitoring and support role, the Business Ethics Advisor can make use of all company resources, in particular the services of Legal Affairs and Human Resources.

Any employee who believes they have, **in good faith**, identified behaviour contrary to the Code **or serious harm to the public interest**, may report this to their line manager. Their line manager must conduct the necessary investigations to establish whether the deviation from the Code has occurred and take appropriate measures to end it, where necessary. Employees can also refer a matter direct to the Business Ethics Advisor. In both cases, TechnicAtome guarantees the confidentiality of the procedure initiated by the employee (**employee’s identity, content of the report, identity of the persons concerned**) and complete neutrality (**no discrimination of any kind**) towards the employee who made the report.

The option of reporting a matter direct to the Business Ethics Advisor is also open to customers, suppliers, partners and any other third parties.

Anyone who is asked to do something that is manifestly contrary to the Code has the right not to comply. They must report the matter to the Business Ethics Advisor or, where appropriate, to the company’s senior management for investigation. No action will be taken against them for not following orders if the facts are proven.

TECHNICATOME'S COMMITMENTS

2



TechnicAtome's ethical commitments apply to all the company's activities and are expressed for the benefit of all of its stakeholders: its supervisory authorities, shareholders, customers, employees, suppliers, subcontractors and partners, the public and the environment.

SUPERVISORY AUTHORITIES

TechnicAtome ensures the interests of its supervisory authorities and the end users of its products and services are protected when conducting its business.

SHAREHOLDERS

TechnicAtome respects the company's rules of governance drawn up by its shareholders and acts with total transparency towards them.

CUSTOMERS

TechnicAtome prioritizes the satisfaction of its customers: listening carefully to their needs, focusing consistently on the quality and performance of the products and services it provides and, more generally, fulfilling the commitments it makes.

TechnicAtome respects the culture and protects the image and interests of its customers, especially the confidentiality of the data or know-how to which its customers give it access, within the legal and regulatory framework, on the same basis as if they were its own.

EMPLOYEES

TechnicAtome's personnel are recruited without discrimination, especially on the basis of ethnic origin, religion, age, gender, sexual orientation, political opinions or social background, within the clearance constraints imposed by its activity.

TechnicAtome makes every effort to recognize the contribution made by its employees and to ensure they have a good quality of life in the workplace by providing the right resources and conditions for their occupational fulfilment.

TechnicAtome is committed to maintaining a social dialogue and conducts that dialogue sincerely and in good faith. It constitutes a token of trust in the relationship between the company and its staff.

TechnicAtome offers its employees training plans to develop their skills in all the areas required by their role and to develop their career.

TechnicAtome respects the privacy of its employees, maintains a neutral position as regards political opinions and philosophical or religious beliefs and bans any propagandising in the workplace.

TechnicAtome recognizes the importance of a good work/life balance for its employees, and especially their right not to be contactable at all times.

SUPPLIERS, SUBCONTRACTORS AND PARTNERS

TechnicAtome is keen to forge lasting relationships with its suppliers and subcontractors in order to give its customers the highest level of service.

TechnicAtome is committed to maintaining fair, equitable, objective and mutually respectful relationships with all of its suppliers, subcontractors and partners.

TechnicAtome protects their image and confidential data as if they were its own.

THE PUBLIC, THE ENVIRONMENT

Respect for security requirements, the protection of public health and safety, and maintenance of the smallest possible environmental footprint are core priorities of TechnicAtome's activity on a day-to-day basis and in the long term. In particular, the company has a policy of identifying and preventing risks to health, safety and environmental protection.

EXPECTATIONS OF TECHNICATOME

3



Meeting the company's ethical commitments demands and relies on appropriate behaviour on the part of everyone contributing to the performance of its activities: its employees, its subsidiaries and holdings, and its suppliers, subcontractors and partners.

EMPLOYEES

All employees must comply with the Code. They are individually and collectively its custodians, guarantors and main players. The same is expected of temporary personnel.

Employees should therefore appropriate the Code, know what it contains, understand it and apply it; they should contact their line manager or the Business Ethics Advisor if they have any questions or doubts about its content or about something that has happened that they are unsure about.

Employees should be aware that certain failures to comply with the Code make both them and TechnicAtome vulnerable to civil or criminal prosecution.

They should alert their line manager or the Business Ethics Advisor if they identify a failure to follow the rules of conduct set out in the Code.

Employees should demonstrate professional excellence, competence and conscientiousness. They should act with integrity and comply with all current legal and regulatory requirements. Everything that they do or that is done by subcontractors must be completely traceable.

Employees should strive for excellence in the products and services provided by TechnicAtome; they should ensure any knowledge of value to its business is passed on.

Managers also have a particular responsibility to lead by example and to ensure that their staff are aware of the Code and act upon it.

To do this, they should be familiar with the different issues covered by the Code and be able to answer any questions that their staff might ask about its content.

They should also identify the risks related to any divergence from the Code that could occur in the context of the activities of the entity for which they are responsible.

They should decide what corrective measures should be taken if such an event is reported to them or has become known to them independently.

SUBSIDIARIES AND HOLDINGS

All subsidiaries, and all entities created with partners and controlled by TechnicAtome, must comply with the Code.

SUPPLIERS, SUBCONTRACTORS AND PARTNERS

By signing a commercial agreement with TechnicAtome, every supplier, subcontractor, partner or consultant commits to comply strictly with the Code in the long term and to promote its application within their sphere of influence.

TechnicAtome reserves the right to check that the practices of its suppliers and subcontractors, financial partners, industrial partners, consultants and commercial agents are compliant with the Code at any time.

RULES OF CONDUCT

4



COMPLIANCE WITH LAWS, REGULATIONS AND INTERNAL PROCEDURES

Every citizen is required **to comply strictly with all regulations in force**, such as legal and regulatory requirements and **international commitments properly ratified and approved by France**. In addition to this individual responsibility, the company pursues a policy of support for the application of the Code and monitoring as regards its employees, to protect both them and itself from the risk of civil and/or criminal sanctions and the risk of damage to its image.

Internal procedures (internal regulations, directives, instructions, etc.) governing the operation of the company and its governance have been established to ensure that the company's activities meet legal and regulatory requirements and to manage the risks involved in these activities. Employees are responsible for compliance with these internal procedures in the context of their own activities.

INTERNATIONAL ACTIVITIES

All the company's activities must be performed in strict compliance with applicable national and international legal and regulatory requirements.

In its nuclear business, TechnicAtome supplies goods, services and technologies only to nations and companies from those nations that comply with international provisions in force relative to non-proliferation, IAEA safeguards and export controls. TechnicAtome refuses to work under any other conditions and scrupulously respects national and international rules on exports.

Everyone must make sure of this in their day-to-day activities and may seek support to do so from the person in charge of Export Control within the company.

SUPPLIERS, SUBCONTRACTORS AND PARTNERS

TechnicAtome's supplier, subcontractor and partner companies must comply with the principles set out in the:

- United Nations Declarations:
 - > Universal Declaration of Human Rights
 - > Declaration on the Elimination of Discrimination Against Women
 - > Declaration of the Rights of the Child.
- International Labour Organization Conventions:
 - > Concerning the Abolition of Forced Labour
 - > Concerning Minimum Age for Admission to Employment
 - > Concerning Freedom of Association and Protection of the Right to Organise
 - > Concerning the Right to Organise and to Bargain Collectively
 - > Concerning Discrimination in Respect of Employment and Occupation.
- The OECD's Guidelines for Multinational Enterprises.

Generally-speaking, all activities of these companies must be performed in strict compliance with applicable national and international regulatory requirements.

CONFLICTS OF INTEREST

Every employee must act with honesty and report without delay to their line manager any situation in which, in the performance of their activities, their personal interests or those of someone close to them could conflict with the company's interests.

Employees must take care not to put themselves intentionally in a situation of conflict of interest and not to take part in any analysis, meeting or decision concerning matters involving their personal interests or those of someone close to them.

A spouse, child or other relative of an employee can only be hired or appointed with the approval of their line manager, to whom the same rules apply, and on the basis of objective criteria, in order to avoid any ambiguity or suspicion of favouritism. The employee with this family tie cannot participate in the selection of their relative.

Conflicts of interest reported to a line manager are analysed on a case-by-case basis with the two hierarchical levels above that line manager. They settle the conflict in accordance with the laws and regulations in force.

In particular the following situations (non-exhaustive list) leading to potential conflicts of interest should be declared:

- An employee or a member of their family has a personal interest or financial stake in one of TechnicAtome's customer, supplier or competitor companies.
- An employee is a director or corporate officer in an external company involved with TechnicAtome.
- An employee or a member of their family is a consultant or holds a management post or is a member of the sales or purchasing department of another company involved with TechnicAtome or seeking to work with it.
- An employee or a member of their family is making premises, equipment or personal property available to TechnicAtome for a fee.

Any conflict of interest or risk of conflict of interest involving the company, regardless of who initiated it internally or externally, can be reported to an employer's line manager or to the Business Ethics Advisor.

CORRUPTION, GIFTS, UNFAIR ADVANTAGE

General attitudes

Integrity should govern the relationships between TechnicAtome's employees and public services, customers, suppliers and partners.

TechnicAtome prohibits corruption in any form, whether public or private, active or passive.

Any active or passive corruption identified or any invitation from a third party to engage in such corruption should be reported to an employee's line manager or to the Business Ethics Advisor so that measures can immediately be taken to investigate whether it is true, in particular by carrying out appropriate audits, and to stop it without delay if it is proven.

Employees should avoid situations in which they find themselves even momentarily beholden to a third party, situations that are simply ambiguous, and equivocal insinuations of a similar nature.

Gifts and hospitality

TechnicAtome recognizes that the occasional acceptance or offer of gifts or hospitality of modest value can sometimes make an appropriate contribution to good business relationships.

However, gifts and hospitality must only be offered or received by employees transparently, in accordance with the law and regulations; they should never influence decision-making and there should never be any perception that they have had such an influence on the donors of beneficiaries..

In any case, the value of a gift or hospitality offered or received should not be more than a few dozen Euros; where the value of gifts or hospitality offered or received is thought to be more than fifty Euros, it should be declared to the Business Ethics Advisor or returned to the sender.

PAYMENTS

All entities and managers must be able to justify at all times the true source and use of all sums of money.

Payments should not be made or received if their purpose is not fully and accurately described in the contractual and accounting documents required to show them.

No payment method designed to protect the anonymity of the payer or payee may be used.

All contracts with commercial agents must be approved in advance in accordance with the procedure in force.

POLITICAL FUNDING

TechnicAtome does not give funding or provide services to political parties or to holders of public office, or to candidates for public office.

SPONSORSHIPS, CHARITABLE DONATIONS

TechnicAtome may enter into sponsorships or make donations to charities in accordance with laws and regulations. These actions are always modest in scale, and they must also reflect the company's values; they must never be in return for any administrative or commercial benefit.

With sponsorships and charitable donations, TechnicAtome must only be involved as a partner, without any responsibilities as manager or operator, and it only supports projects or initiatives run by the originators once all the required legal and administrative formalities have been completed and the necessary permissions and guarantees have been obtained.

COMPETITION

TechnicAtome and its employees must abide by French, European and international competition law and the law in each of the countries where the company operates.

TechnicAtome and its employees must refrain from any attempt, whether direct or indirect, to distort competition in any commercial transaction. They must also refrain from engaging in any unfair conduct towards competitors and from participating in unlawful agreements.

The collection or use of information related to third parties, especially TechnicAtome's partners, must be done strictly in accordance with applicable laws.

PROTECTION OF PEOPLE AND PROPERTY

Employees must immediately bring to the attention of their line manager any issues that they identify with the protection of people and property.

People

TechnicAtome ensures the activities performed on its sites are compliant with current rules and with its health, safety and environmental protection policy.

TechnicAtome conducts its business in strict respect for human dignity, rejecting any kind of harassment and any infringement of human rights or the rights of the child.

Any failure to fulfil these obligations should be reported to the appropriate level of management so that measures can be taken without delay to investigate whether the report is true, to carry out the appropriate audits and to stop the conduct if it is proven.

Reputation and image

TechnicAtome's reputation is one of its core assets. Employees have a duty at all times not to say or do anything or allow anything to be said that could damage this reputation.

In national and international relations, the respect owed to the host venue or nation means that there should be no disparagement, no ostentatious or uncivil behaviour, or any offhandedness towards people with whom one is in contact.

Intangible assets

Employees must make every effort to protect the company's confidential data, whether marked confidential or not, against intrusion, theft, loss, damage, misuse, disclosure, reproduction, falsification, use for non-professional, illegal or non-transparent purposes, especially on the internet or intranet.

In particular, they must protect technical and administrative data, the files of customers, prospective customers and suppliers, software, passwords, documents and plans, methods and know-how, manufacturing secrets, techniques and settings, intellectual and industrial property, forecasts, contracts and agreements, cost prices and selling prices, strategic or commercial goals, research and development information, financial and corporate information, names and contact details of specialists and experts.

Material assets

Employees must make every effort to use and store material assets correctly where the malfunction, loss, theft or unlawful use of such assets would be detrimental to the company.

TechnicAtome is specialized in the design, construction, operation and maintenance of compact nuclear reactors.

TechnicAtome employs about 1,500 people and operates for naval propulsion, research, nuclear medicine and energy.

For more than 45 years the company has been offering its nuclear engineering expertise on reactors, fuel and related facilities. TechnicAtome proposes its customers solutions and products that meet the highest safety and availability standards.

www.technicatome.com

