



ULIS' ETHICAL GUIDELINES

This Ethical Guidelines is setting forth the principles and standards of ULIS, to be used as a basis for employee, supplier and partner (hereinafter the "stakeholders") to conduct under all circumstances. The guidelines, which are summarized below, are not intended to replace or revise the laws and regulations in force, but to provide points of reference and guidance for the conduct of professional activities.

I - Behavior outside ULIS

Upholding the laws

In all the countries in which ULIS operates, ULIS and its stakeholders must uphold the law. Care should be taken, as it may be difficult to understand the law in a legal and cultural environment that is very different than that in which the stakeholders have previously worked. When there is a question or there is any doubt, the ULIS' stakeholders should immediately consult with its management or the head of legal affairs. Stakeholders working in a foreign country must uphold the law of the country in which they operate. Integrity, honesty and transparency should guide each of ULIS' stakeholders in their work. Stakeholders are expected to deal in ULIS' interest and in compliance with laws and regulations. All stakeholders must take particular care to uphold laws on competition, export and re-export control, labor and employment, environmental protection, safety, health and non-discrimination.

Engaging in proper business practices

Zero tolerance of corruption, ULIS and its stakeholders do not tolerate any form of corrupt practices, be they active or passive, direct or indirect, for the benefit of those in the public or private sector. ULIS applies all international conventions on combating corruption and the anti-corruption laws in force in the countries where it does business.

ULIS and its stakeholders never use a third party to perform any task that they are ethically or legally forbidden to perform themselves. Engaging a third party for the purpose of bribing a natural person or a legal entity violates anti-corruption laws.

Complying with export laws

As an international market operating company, ULIS purchases goods and services from a diverse group of suppliers. ULIS also provides goods and services to customers all over the world. It is therefore critical that ULIS strictly complies with all applicable regulations that govern its export activities. Before engaging in any export activity, its employees must verify the eligibility of both the delivery location and the recipient. They must also obtain, when applicable, all required licenses and permits, including government authorizations and approvals for government-controlled products or technologies. These authorizations can be obtained from the relevant management in cooperation with ULIS' export control officer. Import activities are also subject to various laws and regulations, and it is the responsibility of ULIS' stakeholders to comply with all of the applicable standards. Any breach of these regulations on imports and exports has serious consequences for ULIS. It is each stakeholder's responsibility to know and comply with the laws and regulations that apply to ULIS's activities.

Competing fairly

As part of its commitment to fair competition, ULIS strictly comply with applicable competition laws in the countries where it does business. In general, these laws prohibit agreements or practices likely to restrain or alter competition or trade. Examples of prohibited agreements include: price fixing, bid rigging, allocating markets, territories or clients amongst competitors, or boycotting or discriminating among certain customers or suppliers unless legally justified. The exchange or disclosure of commercially sensitive information relating to competitors, customers or suppliers may also violate applicable laws.



Gifts and hospitality

Business courtesies, such as gifts and hospitality, given to or received from customers, suppliers and other partners are commonly used to build goodwill and acknowledge appreciation in business relationships. However, these courtesies must not exceed a nominal value and may not influence, or give the appearance of influencing, any business decision. Good judgment, discretion and prudence should always guide any stakeholders in these situations. Business courtesies are prohibited by law under certain circumstances and in certain countries. ULIS' stakeholders must comply with the policies and laws that apply in each country where ULIS does business.

Behavior towards customers

Each stakeholder must uphold the principles of fairness and integrity in dealings with customers. The business of ULIS, to a large extent, concerning security and defense, no compromise can be tolerated for any reason; any situation that may seem questionable to an employee must immediately be referred to a superior or the Quality manager.

Financial relationships

ULIS and its stakeholders should ensure, on a timely basis, and in an effective manner, complete, relevant, accurate and precise information that is consistent with previous information. They take particular care to implement corporate governance standards and principles.

Relations with suppliers

ULIS selects suppliers on the basis of objective criteria and demands high performance from them, in order to ensure that ULIS' expectations and those of its customers are fully met. Under no circumstances will ULIS use suppliers that make use of child or forced labor.

Political and religious activities

ULIS does not finance any political parties and any political activities must be carried out exclusively outside the work-place and working hours. Any religious practices in which employees may be involved must be practiced exclusively outside the work-place and working hours, except in the case of a legal obligation.

Integrity

Under no circumstances may stakeholders damage the reputation of ULIS or compromise the integrity of its assets or its information systems. Paid work of any kind that employees may perform outside the scope of their employment with ULIS must not cause conflicts of interest with their duties within ULIS. Similarly, considerable caution is required when purchasing shares, directly or via an intermediary, in companies doing business with ULIS. Such restrictions do not apply to listed companies, unless confidential information is used which may be construed as insider trading.

II - Behavior inside ULIS

Information control

Employees must ensure the protection of information acquired in the course of or in connection with the performance of his or her duties. Employees are to pay particular attention to respect the internal rules of protection and applicable requirements during both written and oral communication.

Protecting the confidential nature of certain information

In the course of their duties, all employees have access to confidential information, which represents a key asset of the company. Confidential or classified information is sensitive information which must not be disclosed or communicated outside of ULIS. Similarly, Group employees may have information concerning the national security. Care must therefore be taken to ensure that such information is protected from third parties.

Environnement

Today more than ever, protecting the environment is a critical concern for all the company's stakeholders. ULIS and its stakeholders (i) manage the chemical risk and substitutes CMR products (carcinogenic mutagenic, toxic to reproduction) each time possible ; (ii) prevent any accident and accidental pollution risks ; (iii) permanently improve risks managements of their activity on health and environment ; (iv) reduce their power and water consumptions in consideration of the manufacturing volumes ; (v) design products and process managing their environmental impacts.



Safety and health care

The safety and health of individuals are prime value for ULIS. ULIS prevents musculoskeletal psycho-social disorders.

Improvement of the diversity

ULIS has adhered to the French "Charter of diversity", and has accordingly committed to : (i) raise awareness of non-discrimination and diversity issues among top management and staff involved in recruitment, training and career development and to educate them in these matters; (ii) respect and promote the application of all aspects of the principle of non-discrimination at every stage of the human resources management, in particular in the recruitment, training, promotion and career development of employees; (iii) endeavour to reflect, the diversity of the French society particularly in its cultural and ethnic dimension at every level of its workforce; (iv) make all its employees aware of its commitment to non-discrimination and diversity, and keep them informed of the practical results of this commitment; (v) make the development and implementation of the diversity policy a subject of a dialogue with the employees' representatives ; (vi) insert a chapter in the annual report describing our commitment to non-discrimination and diversity including details of the measures implemented, our internal procedures and the results achieved.

Compliance with the Ethical Guidelines

Each stakeholder is required to review, understand and comply with these Ethical Guidelines. In the event of a question or any doubt regarding appropriate conduct, it is the responsibility of the stakeholder to immediately contact the ULIS' management or the head of legal affairs.

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