

CODE OF CONDUCT

Message from CEO

“At ASN, our core values are rooted in fostering enduring trust and confidence among our customers and partners. We are committed to innovatively thinking ahead, skilfully developing, and effectively implementing subsea optical fiber networks across the globe. Our approach is not just about connectivity; it’s about doing so responsibly and sustainably, ensuring that every project we undertake contributes positively to the world we live in.”

Alain Biston, CEO

In order to effectively deliver on our core values, we are committed to conducting business ethically, responsibly, and transparently. Our success is built on the trust of our stakeholders: employees, customers, suppliers, investors, authorities and the communities in which we operate. This Code of Conduct outlines the principles that guide our behavior and decisions, ensuring we act with integrity in all aspects of our business.

This Code applies to all employees, officers, and directors of Alcatel Submarine Networks (“ASN”), as well as our business partners where applicable. The elements of this Code of Conduct are the subject of regular training sessions that all ASN employees are required to attend. Each of us is responsible for understanding and following the guidelines in this Code and the associated policies. Acting against the principles set out in this Code may lead to disciplinary actions.

Here is a concise summary of the 11 sections of our Code of Conduct in 5 key pillars:

1. **Ethics and Integrity:** Conduct business with honesty, fairness, and transparency. Avoid corruption, bribery, and ensure accurate reporting.
2. **Legal Compliance:** Adhere to all laws, regulations, and ethical standards globally, including anti-bribery, trade sanctions, and competition laws.
3. **Human Rights and Diversity:** Respect human rights, promote diversity, and ensure a safe, inclusive, and harassment-free workplace.
4. **Sustainability and Responsibility:** Protect company assets, minimize environmental impact, and foster responsible use of resources.
5. **Accountability:** Report violations, avoid conflicts of interest, and ensure honest decision-making while safeguarding the company's reputation.

1. Ethical Business Practices

1.1 Honest and Fair Dealings

We are committed to conducting business with honesty and integrity. This means treating our customers, suppliers, partners, and competitors fairly. Our actions must reflect transparency, respect, and ethical behaviour.

- **No Bribery or Corruption:** We strictly prohibit any form of bribery, corruption, or improper payments to government officials, private individuals, or entities to obtain or retain business.
- **Fair Competition:** We adhere to antitrust and competition laws that promote fair competition. Any agreements, understandings, or practices that could unfairly restrict competition are prohibited.

1.2 Accurate and Transparent Reporting

We ensure the accuracy and completeness of all reports, documents, and records. Financial statements, contracts, and internal reports must accurately reflect the company's operations.

- **No Misrepresentation:** Employees must never misrepresent facts or manipulate financial or operational data.
- **Compliance with Accounting Standards:** We follow applicable accounting principles and standards to ensure transparent and truthful financial reporting.

2. Compliance with Laws and Regulations

2.1 Legal Compliance

We are committed to complying with all applicable local, national, and international laws and regulations. Employees are responsible for understanding and following the laws that apply to their roles, including but not limited to:

- **Anti-Corruption Laws:** We comply with global anti-corruption laws such as the French Sapin II, the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and other local laws.
- **Trade Sanctions and Export Controls:** We comply with all applicable trade restrictions, export controls, and sanctions laws when dealing with foreign entities.

2.2 Anti-Money Laundering

We maintain robust anti-money laundering practices and are committed to identifying and preventing any involvement in money laundering activities. We do not knowingly support or facilitate money laundering or financing of illegal activities. Any suspicious activities must be reported to the Legal & Compliance Directorate.

3. Human Rights and Fair Labor Practices

3.1 Human Rights Commitment

We respect and promote internationally recognized human rights as set forth in the United Nations Universal Declaration of Human Rights. We are committed to conducting business in a manner that respects the rights of all individuals.

- **No Forced Labor or Child Labor:** We prohibit the use of forced labor, including bonded, prison, or child labor, in any of our operations or supply chains.
- **Dignity and Respect:** We treat all individuals with dignity and respect, and we do not tolerate any form of discrimination, harassment, or exploitation.

3.2 Diversity and Inclusion

We are dedicated to fostering an inclusive workplace that promotes diversity in all forms, including race, gender, age, religion, sexual orientation, and disability. Diversity strengthens our organization and allows us to better serve our global customers.

- **Equal Opportunity Employment:** We provide equal opportunities in all aspects of employment, including recruitment, promotion, and training.
- **Prohibition of Discrimination and Harassment:** Discriminatory practices or harassment of any kind, including sexual harassment, are strictly prohibited.

4. Workplace Health and Safety

4.1 Safe Work Environment

We are committed to providing a safe and healthy work environment for all employees. Employees, contractors and business partners must comply with all health and safety regulations and company policies designed to prevent workplace injuries and accidents.

- **Health and Safety Standards:** We adhere to all applicable workplace safety regulations and follow internal policies designed to minimize risks and ensure employee well-being.
- **Reporting Hazards:** Employees must immediately report any unsafe conditions or workplace hazards to their supervisors or the QHSE Directorate.

4.2 Drug and Alcohol-Free Workplace

We maintain a drug- and alcohol-free workplace to ensure the safety and productivity of our employees. The use, possession, or distribution of illegal drugs or the abuse of alcohol on company property or while conducting company business is prohibited.

5. Protecting Company Assets

5.1 Responsible Use of Company Resources

We are all responsible for protecting ASN's assets, including physical property, intellectual property, technology, and financial resources. Misuse, waste, or theft of company assets is strictly prohibited.

- **Use for Business Purposes:** Company resources, including computers, phones, and other equipment, should only be used for legitimate business purposes, unless otherwise authorized.
- **Intellectual Property:** We must protect the company's intellectual property, including patents, trademarks, copyrights, trade secrets, and confidential information.

5.2 Confidentiality and Data Privacy

We must safeguard all confidential and proprietary information related to the company, our employees, and our customers and business partners. Unauthorized disclosure or use of confidential information is prohibited.

- **Data Protection:** We comply with applicable data protection regulations, including the General Data Protection Regulation (GDPR), ensuring the proper handling and security of personal data.

6. Conflicts of Interest

6.1 Avoiding Conflicts

A conflict of interest occurs when personal interests interfere, or appear to interfere, with the interests of the company. Employees must avoid any situation that could result in a conflict of interest and disclose any potential conflicts to their managers.

- **Personal Relationships:** Employees must avoid hiring or supervising close relatives unless such relationships are disclosed and managed appropriately.
- **External Business Interests:** Any employment, consulting, or ownership of interests in competitors, suppliers, or customers must be disclosed and approved by management.

6.2 Gifts and Hospitality

Gifts and hospitality may be offered or accepted only if they are reasonable, appropriate, and in line with local laws and company policies. Lavish or extravagant gifts are prohibited as they could be perceived as attempts to influence business decisions.

- **Nominal Value:** Gifts should be of nominal value and given as a gesture of goodwill, not as an attempt to gain preferential treatment.
- **Prohibited Practices:** Cash gifts, gifts in exchange for favors, or gifts during contract negotiations are prohibited.

7. Environmental Responsibility

7.1 Sustainability Commitment

We are committed to reducing our environmental footprint and promoting sustainability in all our operations. This includes minimizing waste, conserving energy, and using resources efficiently.

- **Compliance with Environmental Laws:** We comply with all applicable environmental regulations and aim to exceed these standards wherever possible.
- **Sustainable Practices:** We seek to innovate and implement sustainable business practices throughout our supply chain.

7.2 Reducing Environmental Impact

Our business operations aim to reduce greenhouse gas emissions, minimize water usage, and manage waste responsibly. Employees are encouraged to contribute to the company's sustainability goals by making environmentally conscious decisions in their daily work.

8. Responsible Marketing and Communication

8.1 Honest Communication

We are committed to providing clear, accurate, and honest communication in all our marketing and business materials. False or misleading statements that could misinform our customers or stakeholders are strictly prohibited.

- **Compliance with Advertising Laws:** We follow all applicable advertising and marketing laws to ensure that our communications are truthful and non-deceptive.

8.2 Social Media Usage

Employees must be mindful of their online presence and how it reflects on the company. When using social media, employees must not disclose confidential information or make statements that could damage the company's reputation. Only employees who are expressly authorized by their role or have received prior approval may communicate on behalf of the company. Unauthorized representation of the company on social media is strictly prohibited. When engaging on social media in a personal capacity, employees must make it clear that their views are their own and do not represent the company.

9. Supplier and Partner Relationships

9.1 Ethical Partnerships

We expect our suppliers and business partners to adhere to similar ethical standards as outlined in this Code of Conduct. We are committed to building relationships with partners who respect human rights, labor laws, and environmental standards.

- **Due Diligence:** We conduct appropriate due diligence on our suppliers, customers and other third parties to ensure they align with our values and ethical standards and prevent involvement in unlawful activities and preserve the reputation of the company.
- **No Tolerance for Corruption:** We do not tolerate corruption in our supply chain and expect our suppliers to comply with all applicable anti-corruption laws.

10. Whistleblowing and Reporting

10.1 Reporting Violations

Employees are encouraged to report any violations of this Code of Conduct, applicable laws, or company policies. We provide multiple channels for confidential reporting, including at the following email: ethics@asn.com.

- **No Retaliation:** Retaliation against employees who raise concerns in good faith is strictly prohibited. All reports will be investigated thoroughly, and appropriate action will be taken.

10.2 Investigation of Violations

The company will investigate any reports of unethical behavior, legal violations, or breaches of this Code.

11. Ethical Decision-Making

11.1 Decision-Making Framework

When faced with a difficult decision, employees are encouraged to use the following framework:

1. **Is it Legal?** Ensure the action complies with laws and regulations.
2. **Is it Ethical?** Consider whether the action aligns with our ethical principles.
3. **Is it Consistent with Company Values?** Does the action uphold the company's reputation and integrity?
4. **Would You Be Comfortable with Public Disclosure?** Consider how the decision would be perceived by stakeholders, including the media and the public.

Take Away

At ASN, we are committed to maintaining the highest standards of ethics and integrity in all aspects of our business. By adhering to this Code of Conduct, we ensure that we remain a trusted and respected organization.

If you have any questions about this Code or need guidance, please contact your manager or the Legal & Compliance Directorate. If you want to report any concerns, you can contact your manager, the Legal & Compliance Directorate, or use our whistleblower reporting channel (ethics@asn.com).