

# THIRD PARTY 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, skillfully 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**

## Introduction

At Alcatel Submarine Networks (“ASN”), ethical conduct, legal compliance, and sustainability are at the core of our business practices. Our relationships with third parties - including suppliers, contractors, distributors, consultants, and other business partners - are built on mutual trust, shared values, and a commitment to responsible business practices.

This Third-Party Code of Conduct establishes the principles, standards, and requirements expected of all third parties with whom we engage. It reflects our commitment to human rights, business integrity, and environmental sustainability, as well as adherence to applicable international standards and regulations, and is aligned with our own Code of Conduct (that can be found here: <https://www.asn.com/ethics-compliance/>).

Scope: This Code applies to all third parties who conduct business on behalf of ASN or are part of its supply chain. Third parties are expected to ensure that their own suppliers, subcontractors, and other partners also uphold these standards.

Failure to comply with this Code may result in termination of the business relationship and, in some cases, legal action.

## 1. Compliance with Laws and Regulations

### 1.1 General Legal Compliance

Third parties must comply with all applicable national and international laws, regulations, and industry standards in the jurisdictions where they operate. This includes obligations related to taxation, trade, labor, anti-corruption, and health and safety.

### 1.2 Anti-Corruption and Bribery

Third parties must strictly adhere to anti-corruption laws such as:

- the French Sapin II Law.
- the U.S. Foreign Corrupt Practices Act (FCPA).
- the UK Bribery Act 2010.

- local anti-corruption and anti-bribery laws.

They must not offer, promise, or provide anything of value, either directly or indirectly, to government officials, private individuals, or any other third party to obtain or retain business or gain an improper advantage. This includes gifts, hospitality, facilitation payments or any other promise intended to influence decision-making.

### 1.3 Trade Sanctions and Export Controls

Third parties must comply with all applicable trade and export control regulations, including economic sanctions and embargoes. Business dealings must not involve entities or individuals that are subject to international trade restrictions.

### 1.4 Compliance with Industry Standards

Where applicable, third parties must adhere to relevant industry-specific regulations and standards (e.g., environmental regulations for manufacturing).

## 2. Business Integrity and Ethical Conduct

### 2.1 Integrity and Transparency

All business dealings must be conducted with honesty, transparency, and integrity. Third parties must accurately record all transactions and provide truthful information when interacting with ASN or any relevant stakeholders.

### 2.2 Avoidance of Conflicts of Interest

Third parties must avoid situations where their interests conflict, or appear to conflict, with the interests of ASN. For example:

- Having close personal or financial relationships with ASN employees.
- Engaging in outside business dealings that could compromise the third party's objectivity.

Potential conflicts of interest must be disclosed immediately.

### 2.3 Fair Competition

Third parties must uphold the principles of fair competition and avoid engaging in practices such as:

- Price-fixing.
- Bid-rigging.
- Market allocation.

Third parties must respect intellectual property rights and ensure compliance with all competition laws.

### 2.4 No Improper Influence

Gifts, entertainment, or other benefits provided to ASN employees must not be excessive or intended to influence business decisions. Any such benefits must comply with ASN's gift and entertainment policy.

## 3. Human Rights and Labor Practices

### 3.1 Respect for Human Rights

Third parties must uphold and respect internationally recognized human rights and rights at work principles, including those outlined in:

- the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and its related covenants),
- the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and
- the United Nations Guiding Principles on Business and Human Rights.

In their activities and operations, third parties shall, notably, provide just and favorable conditions of work, favor protection against unemployment, ensure decent treatment and appropriate working hours and rest.

Third parties must take steps to avoid contributing to human rights abuses in their operations and supply chains.

### 3.2 Prohibition of Forced and Child Labor

- Forced, bonded, or involuntary labor is strictly prohibited.
- Child labor must not be used under any circumstances. The minimum working age must comply with the International Labour Organization (ILO) Conventions and local labor laws.

### 3.3 Non-Discrimination and Equal Opportunity

Third parties must provide a workplace free of discrimination, harassment, and abuse. Employment decisions must be based on qualifications, skills, and experience, without regard to race, gender, religion, age, disability, sexual orientation, or any other legally protected characteristic.

### 3.4 Freedom of Association and Collective Bargaining

Third parties must respect employees' rights to form and join trade unions and to engage in collective bargaining, as permitted by local law.

### 3.5 Safe and Healthy Working Conditions

Third parties must provide safe and healthy workplaces and working conditions by identifying and mitigating risks. This includes:

- Regular safety training for employees.
- Access to protective equipment.
- Proper handling and storage of hazardous materials.

## **4. Environmental Sustainability**

### **4.1 Compliance with Environmental Laws**

Third parties must comply with all applicable environmental laws and regulations, including those related to waste management, emissions, and hazardous substances.

### **4.2 Environmental Responsibility**

Third parties are encouraged to adopt sustainable practices, such as:

- Reducing greenhouse gas emissions.
- Using renewable energy sources and avoiding over-use of natural resources.
- Implementing water and energy efficiency measures.

In general, third parties should mitigate any negative environmental impact of their activities conducted for or on behalf of ASN.

### **4.3 Sustainable Sourcing**

Third parties must source materials responsibly and avoid contributing to environmental harm, such as deforestation or illegal mining. Conflict minerals must be avoided unless they are sourced in accordance with recognized frameworks, such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

## **5. Data Protection and Confidentiality**

### **5.1 Protection of Personal Data**

Third parties must comply with all applicable data privacy laws, including the General Data Protection Regulation (GDPR), and other local data protection laws. Personal data must only be collected, stored, and processed with appropriate consent and safeguards.

### **5.2 Safeguarding Confidential Information**

Confidential or proprietary information shared by ASN must be protected against unauthorized access or disclosure. Third parties may only use such information for its intended business purpose and must implement strong security measures to prevent breaches.

## **6. Monitoring, Reporting, and Consequences of Non-Compliance**

### **6.1 Monitoring and Audits**

ASN reserves the right to audit third-party operations, records, and practices to verify compliance with this Code. Third parties must cooperate with such audits and implement corrective actions where necessary.

### **6.2 Reporting Violations**

Third parties are required to report any actual or suspected violations of this Code or unethical behavior through ASN's compliance reporting email ([ethics@asn.com](mailto:ethics@asn.com)) or any other reporting channel made available by the company. Strict confidentiality will be applied by ASN to reports received through the above reporting systems, and retaliation against individuals who report concerns in good faith is strictly prohibited.

### 6.3 Consequences of Non-Compliance

Non-compliance with this Code may result in:

- Warnings and requests for corrective actions.
- Suspension or termination of the business relationship.
- Reporting of misconduct to relevant authorities, where appropriate.

## 7. Ethics and Compliance Training Requirements

### 7.1 Training

As part of our commitment to maintaining the highest standards of ethical conduct and compliance, the Company may require third parties to complete ethics and compliance training based on a risk-based assessment. Training requirements are determined according to factors such as the nature of the engagement, the services provided, and participation in specific projects. Where applicable, ASN will communicate the relevant requirements and completion timelines to the third parties concerned.

### 7.2 Certification

Where ethics and compliance training is required, completion of the applicable training programs may be a prerequisite for certification purposes and, where relevant, for maintaining an ongoing business relationship with the Company. By completing such training, third parties acknowledge their understanding of and commitment to the ethical principles and compliance standards set forth in this Code of Conduct, including requirements relating to anti-corruption, data protection, human rights, and workplace integrity.

Failure to complete required training or obtain any required certification may impact the Company's decision to continue the relationship.

### Acknowledgment and Acceptance

By signing below, the third party acknowledges receipt of this Code and agrees to comply with its principles and requirements whilst conducting business with or on behalf of Alcatel Submarine Networks.

Name of Third Party:

Authorized Representative (Name and Title):

Date:

Signature: