

Compliance program
TELESPAZIO France



Our Compliance Program, a manifestation of our Business Ethics

As part of a virtuous approach in line with its ethical business vision, Telespazio France is setting up a robust Compliance Program to manage the risks associated with anti-corruption, conflicts of interest and other breaches of probity that may arise in the course of business.

This Compliance Program is designed to evolve in line with risk scenarios, which are based on risk mapping and are, by their very nature, constantly changing.

Telespazio France's Compliance Program is based on 3 pillars:

- Risk prevention ;
- Detection of risk situations; and
- Remediation of detected risks.

1. Risk prevention

A dedicated Compliance unit

Compliance is the concern of all Telespazio France's employees and a priority for the company's governing bodies.

To this end, a dedicated governance body (the Monitoring Body) has been created, and the Legal & Compliance Direction includes a dedicated Compliance Unit, with a legal expert working in close conjunction with top management. The Compliance Unit is in charge, among other things, of the development and drafting of policies, the ongoing assessment of risks, the implementation of tools and procedures established by policies.

One of the main missions of the Legal & Compliance Direction is to foster within Telespazio France a Compliance culture in with the frame of the company's business values. The Legal & Compliance Direction has a permanent role to play in advising and assisting all management and employees on all Compliance-related issues. It is also responsible for raising awareness and training employees in the risks associated with their activities.

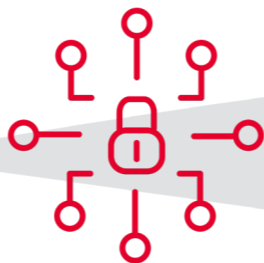
Telespazio France's Legal & Compliance Direction is responsible for monitoring and developing the company's Compliance Program.

Rigorous policies and procedures

All Compliance Program policies are subject to reliable internal control procedures that meet the requirements of the French Anti-Corruption Agency.

The various policies and procedures implemented as part of the Compliance Program reflect a high degree of expectancies, particularly in the following areas:

- Anti-money laundering and terrorism financing,



- Conflicts of interest,
- Gifts, Hospitality & Representation expenses,
- Lobbying and Public relations,
- Management of commercial advisor service providers, lobbyists, etc. contracts,
- Third-party due diligence (KYC procedure for suppliers, customers, partners),
- Whistleblowing management.

Training and awareness

The Compliance Unit is in charge of the awareness raising and training with respect to compliance issues within Telespazio France, with the support of all levels of management. This implies training campaigns for the company's employees whose activities, by their very nature, present a Compliance risk, and awareness raising for the remainder of the employees.



Relations with third parties

As a part of managing the risks inherent to its business, Telespazio France has set up procedures providing for due diligence checks on its current or potential suppliers, customers and other business partners (e.g., members of a consortium) prior to entering into contracts with them.



2. Detecting risk occurrence

Internal audits

The Compliance Unit, in cooperation with Telespazio Group Compliance experts and with the relevant departments within the company, manages the Compliance Program and ensures its respect and effectiveness. Internal audit processes are performed by the Quality Department in order to control deployment of the policies and procedures implemented as part of the Compliance Program and verify their adequacy.

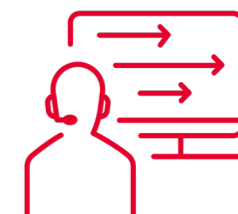


Recommendations are formulated following these internal audits, and all information gathered during these audits is passed on to the company's General Management.

Whistleblowing management

Telespazio France benefits from the digital solution set up by Leonardo Group, enabling anyone to report information concerning a breach of ethics, a breach of competition rules or any other information relevant to the Compliance Program.

Telespazio France guarantees for anyone so wishing, that the information reported is confidential and can be made anonymous. Independently of this digital solution, Telespazio France employees are also invited to report such information to their line manager and/



or to the Monitoring Body through a dedicated mail address.

Investigations

The Legal & Compliance Direction conducts independent and impartial investigations when necessary, either through a self-seizure or following an internal audit or an alert raising suspicions of a potentially risky situation in relation to the company's Compliance Program.



3. Remediation of detected risks

In the event of an occurrence being identified, the situation is appraised and qualified, which may lead to remedial measures such as disciplinary sanctions, remediation plan, procedures updating, training campaign, external audit and any other appropriate measures. In all events, Telespazio works to identify the root causes and strengthen its Compliance Program to protect its activities and employees from compliance risks.

