



CODE OF ETHICS AND BUSINESS

TRANSPARENCY INTEGRITY

- BUSINESS
- HUMAN RESOURCES
- SECURITY
- PROTECTING PROPERTY AND PEOPLE

MESSAGE FROM THE MANAGEMENT OF ASB

To support the development of ASB, more than ever, the values of integrity, honesty and transparency must guide each of us in our activities, both within the company and in our external relationships.

The trust of our clients, our suppliers and our partners is built as much on the results of our activities and the quality of our products as on our way of acting and the strict observance of our methods. Our activity also demands that we meet the expectations of our Regulatory Administration, which verifies our worldwide activities in the control of war material exports.

Our relationships with clients, suppliers and institutions must respect and reflect the ethical principles contained in this code as well as laws and regulations.

This Code cannot cover all potential problematic situations. In case of any doubts, it is the responsibility of each one of us to refer the case to a superior. We are also required to report any situation likely to contravene the law, the principles of this code of ethics, or the internal policies of the ASB group.

We promote a culture of frank communication in which employees do not hesitate to express their concerns and ask for advice, and where department managers are attentive and reactive. If your line manager or department manager cannot respond to a question or concern, employees must approach another member of the management team who will listen to them and undertake to make every effort to resolve the problem.

I trust that you will all commit to following the provisions of the ASB code of ethics.

**Michel Hainaut,
CEO**

CORE PRINCIPLES OF ETHICS

Complying with laws and regulations.

It is everyone's responsibility to comply with laws and regulations, both within ASB and with our clients and suppliers in France and abroad, for employees who travel.

Any activity which risks leading to unlawful practice is strictly prohibited.

Commitment to our employees.

Work relationships must be based on respect, honesty and loyalty. ASB encourages innovation and commitment among employees and we must uphold high standards in quality, health and safety.

Commitment to the company.

We must all avoid putting our personal interests above those of ASB, the ASB group and stakeholders (Airbus, Saft).

Commitment and trust.

We protect the confidential information and property of ASB and of our clients. Everyone at ASB participates in protecting confidential information.

Commitment to business conduct.

Business meals, invitations and small gifts of a non-monetary nature may be offered or accepted in the context of normal business practices. All professional decisions must be warranted.

The stability of our business hinges on the honesty of our professional practices. Corruption is illegal, stifles innovation and is detrimental to the work environment.

ASB applies a zero-tolerance policy to any form of corruption.

BUSINESS RELATIONSHIPS

Identifying and handling conflicts of interest

There may be a conflict of interest when our personal interests interfere, or seem to interfere, with our ability to perform our duties in the interest of ASB-, and with no hidden agenda. For example, a conflict of interest may arise when an employee or members of his or her family, close relatives or friends have significant and undisclosed financial interests in a client company, a company belonging to a supplier, partner or competitor of ASB

As part of our efforts to protect the reputation of ASB and ensure that we act in the interests of the company, we must always avoid conflicts of interest, whether real or perceived. In the event that a conflict of interest cannot be avoided, we must inform our line manager.

When recruiting employees who are or were public officials or civil servants, we must ensure compliance with the applicable laws, regulations and guidelines, including those relating to conflict of interest. These rules also apply to contracts or negotiations with public officials to determine if they can be employed at ASB, whether as employees, consultants or sub-contractors.

Combating money laundering

ASB undertakes to comply with the applicable money laundering laws.

Consequently, ASB only conducts activities with clients and suppliers with a good reputation, whose activities are legal and whose funds and transactions are legal, to the knowledge of ASB.

Fair competition

ASB believes in fair competition and wishes to act in strict compliance with the competition laws applicable -in the countries we operate in.

Complying with export control regulations

Export activity means delivering a product, service, technology or information to a person in a foreign country or a citizen of a foreign country, whatever the means of transport. mail, email, uploading to a server or delivery in person by an ASB employee. Intangible exports must therefore be treated with the same care as physical ones.

Import activity means bringing goods that ASB buys from an external or foreign source into a country.

As a company with an international reach, we buy goods and services from different suppliers around the world. We also provide goods and services to clients around the world. It is therefore essential to comply without exception to all applicable regulations governing our export and import activities.

This is a complex legal and regulatory environment. The Sales & Programmes department is available to respond to any questions about the importing and exporting of goods, services or information. In the event that it is unable to respond to a specific question, the Sales &

Programmes department will seek the support of the supervisory authorities.

Cooperating with the authorities

We are obliged to cooperate with the competent legitimate authorities. Any request from a public official about an enquiry or information must be coordinate by a member of the management team.

Treating suppliers equitably

The contribution of suppliers is an important part of the value of ASB products and therefore plays an important role in client satisfaction. We undertake to establish healthy relationships with suppliers. The Procurement function is obliged to ensure that relationships with all suppliers are handled equitably and in accordance with our principles.

Commitment of product quality and safety

The quality and safety of the products we supply to our clients are part of our identity and represent the fundamental values of ASB. Under no circumstances do we accept any concessions concerning the quality or safety of our products.

In order to honour our commitments in terms of quality, we must respect all quality control rules which govern our responsibilities. These rules include all applicable laws and regulations, as well as internal control procedures aimed at promoting the manufacturing of safe, high-quality products.

Product safety obligations do not end once the product is delivered. Upholding high product safety standards is in our interest and is in the interest of our clients, their clients and the aerospace and global defence industry. Product safety depends to a large extent on feedback, and all employees must immediately report any problem related to safety.

We undertake to guarantee that our products are designed, manufactured, delivered and taken over in accordance with the strictest applicable safety standards and in compliance with all applicable laws and regulations.

Excellence in quality is our absolute priority and involves an obligation of safety. We must all precisely comprehend our role and responsibilities vis-à-vis quality throughout the lifecycle of products and are obliged to report, curtail and remedy any problems which may arise.

Fighting corruption

No ASB employee may engage in acts of public or private corruption, whether actively or passively, whatever their nature, or in acts constituting influence peddling. ASB understands « "corruption" to be promising, proposing or offering, soliciting or receiving, directly or indirectly, any undue advantage, whether monetary or otherwise, to or from a third party in order to obtain or retain business, or any other undue advantage in conducting business.

Corruption can be active or passive. Active corruption is when a natural or legal person uses gifts, promises or advantages to get or try to get a person exercising a public function to carry out or delay or refrain from carrying out an act in the course of their duties or an act facilitated by their position. Passive corruption is when a person exercising a public function uses their position to request or accept gifts, promises or advantages as inducement to carry out or refrain from carrying out an act in the course of their duties. In most anti-corruption legislation, influence peddling is a form of corruption. It consists in directly or indirectly proposing offers, promises, donations, gifts, or any other advantages to a public official or a private individual, to induce them to abuse their real or perceived influence in order to obtain, from an authority, company or public administration, whether domestic or foreign, distinctions, jobs, business or any other favourable decision.

We must abstain from offering, trying to offer, authorising or promising any type of gift, making facilitating payments or kickbacks to a public official or private organisation with the goal of obtaining or retaining business or an undue advantage. Similarly, under no circumstances must we solicit or accept a gift or kickback from a public official or a private organisation.

Consequently, our anti-corruption policies apply to negotiation and concluding commercial contracts, as well as mergers and acquisitions, joint ventures and other projects.

These principles include the following:

Giving internships to family members of clients, which must be done systematically via the HR department in accordance with the candidate's actual skills, and after consulting the implications and possible risks.

Commercial gestures, such as gifts or invitations given to or received from clients, suppliers and other partners, are frequent in business relationships; they must remain signs of courtesy and personal appreciation between partners. Nevertheless, these gestures must reflect normal business relationships and must under no circumstances influence, or give the impression of influencing, a business decision. Common sense is required in these types of situations. Commercial gestures are forbidden by law in certain circumstances and in certain countries. We must all respect the policies applicable to our work and be aware of additional restrictions specific to each country concerned. As a minimum, French law applies to us all: for example, gifts of a monetary nature or other equivalent gifts, for example gift vouchers, are not authorised in any circumstances.

It is however possible to offer or accept logistical aid, for example help booking hotels and transport.

Great care must be taken when selecting agents, representatives and consultants, including vis-à-vis the risk of influence peddling with public authorities.

Facilitating payments (small unofficial payments made to public officials holding mid-level positions with the aim of obtaining or accelerating the execution of routine administrative formalities) are forbidden, both in France and abroad.

Low-value tips are authorised as long as they are in accordance with the habits and customs of the countries in which they are given and as long as they are not given to people in commercial relationships with ASB.

HUMAN RESOURCES

Respect and protection of collaborators

ASB is committed to respecting its collaborators and wants everyone to be able to express themselves freely while respecting others.

All direct or indirect reprisals or attempted reprisals against a collaborator expressing themselves in good faith are strictly prohibited and will not be tolerated.

ASB ensures that no form of humiliation or bullying is tolerated in the company. Respect for the rights and dignity of employees is conducive to a work environment based on trust and which is favourable to ASB's performance and employee fulfilment.

Any physical, visual or verbal harassment in the workplace is strictly forbidden.

Professional development

The professional advancement of collaborators relies upon their potential, their performance, their behaviour and their willingness to take on different functions taking into account the opportunities at ASB. ASB builds a training plan which allows employees to adapt to the needs of their position and develop their professional skills.

Promotion of diversity and equal opportunities

ASB promotes diversity and does not tolerate any discrimination. In its recruitment practices, ASB focuses essentially on the skills of the candidate to come to a decision on an application.

Ensuring workplace health and safety

ASB and its employees undertake to comply with the strictest health and safety standards in the workplace.

ASB recognises that it has a duty to enforce health and safety principles in the company, which extends to its suppliers, partners and entrepreneurs.

Protecting personal data

ASB collects and processes personal data as part of its operational and administrative activities and undertakes to respect and protect the private life of employees, clients, suppliers and partners.

Social relationships

ASB respects the role of social partners and undertakes to allow them to exercise their role day-to-day and in negotiations.

What is - harassment?

As a general rule, "harassment" is understood to be any type of behaviour which aims at or results in infringing upon the dignity of a person or creating an intimidating, hostile, degrading, humiliating or insulting work environment.

Harassment may, for example, take the form of a sexually suggestive behaviour toward a non-consenting person, threats or physical intimidation, comments, mockery or humiliating insults.

ASB strictly prohibits these behaviours. They will be subject to the sanctions set out in the **internal** regulations.

PROTECTION OF PROPERTY AND INFORMATION

It is our duty to protect the property of ASB. We must ensure that none of its assets is stolen, damaged, used or destroyed in an inappropriate way.

Protecting assets

To protect assets, facilities, visitors, data, information systems and telecommunications networks from hostile acts and from competitors, a security policy has been put in place and rules have been issued at ASB. All new starters (employees or on-site providers) are trained by our security officer and any user of ASB software is trained by the security officer in charge of software.

We must treat all property trusted to us in a professional way and at the service of ASB's objectives.

We must use ASB computers, data and means of communication in a safe, ethical, legal and productive way. Under no circumstances must we use ASB computers, tools and information systems for undue or illegal purposes.

Access to exclusive and confidential information is strictly on a need-to-know basis. This information can only be communicated to officially authorised colleagues or to third parties who need it for legitimate professional purposes, or when this communication is legally required.

We are invited to develop innovative solutions. We must constantly ensure that we secure and protect the intellectual property of ASB.

What does-"ASB property" mean?

Material assets, for example facilities, factory equipment, tools, stocks, securities and treasury, department material and supplies, information systems and software;

Exclusive and confidential information, including information which is not yet part of the public domain, and information relating to internal activity, such as contractual documentation, procedures and the strategies of different companies, as well as theories and business plans;

The intellectual property of ASB, including patents, trade secrets, designs, models, mock-ups, rights, inventions, software, procedures, names, trademarks, domain names and information protected by trade names and copyright, or any document classed as confidential and the property of ASB.

Protecting the information of third parties

Our clients, suppliers and other partners often trust their own exclusive and confidential information to ASB. In order to act as a trustworthy partner, we must treat the confidential information of third parties in accordance with their conditions of disclosure and in strict compliance with the applicable laws and regulations.

Access to government-classified information requires specific authorisation in accordance with their sensitivity level. Any exchange or transmission of classified information or material must strictly comply with the applicable security process. Any improper incident or use, whether real or perceived, must be immediately reported to the Safety officer.

Keeping data accurate

Our board of directors, clients, partners and different administrations must be able to rely on the precision and accuracy of the information contained in our documents. We are therefore obliged to ensure that the information communicated to us is accurate, complete, correct, comprehensible and not falsified.

Handling internal and external communication

The reputation and image of the ASB brand are very important assets. It is crucial to promote and protect our image and to keep it strong, clear and coherent. The nature of our activities means that we must exercise high protection over the distribution of technical know-how or or classified programmes, whether national or for export. Consequently, any request for information from the media must be directed to the Communication Department. No information must be communicated to the media without having first obtained advice and prior authorisation from the appropriate department.

ASB employees are not authorised to communicate information or be involved in social media activities on behalf of the company. Remember that ASB's involvement in social networks is handled by the Commercial/Communication Department, or human resources for recruitment.

Moreover, all of the content of published documents, including brochures, advertising and communication media must be truthful and not disparage the products, services or collaborators of competitors.



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