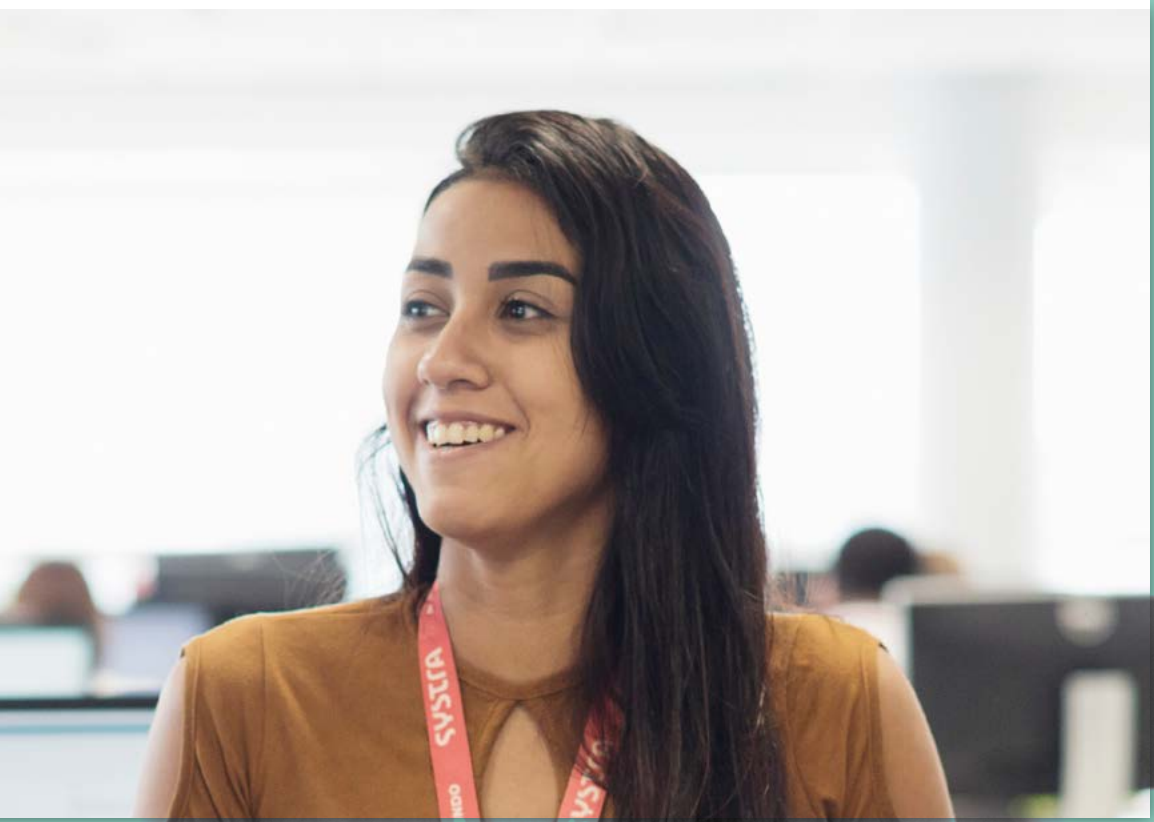
CODE OF ETHICS

The way we act at SYSTRA



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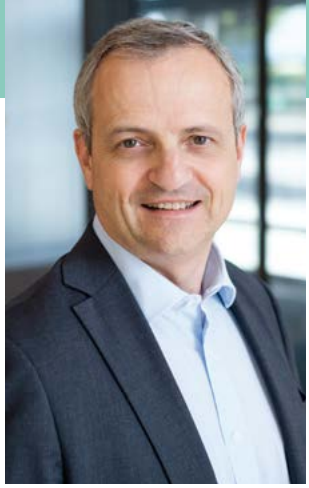


Message from
the Chief Executive Officer

SYSTRA's ambition is to be the signature team for transport solutions.
Ethics are a key pillar.
Without ethics, all our efforts would be in vain.

Beyond the confines of law and regulations, ethics must guide all our actions and decisions, and ensure that we always make the best choices. These choices enable us to develop sustainable growth with our clients, build mutual trust, establish enduring relations with partners who share our ethical attitude, and strengthen everybody's confidence in SYSTRA.

Confidence is fundamental in the relationship between SYSTRA and its clients, on one hand, and other stakeholders in projects in which we are involved, on the other hand.

We have a special duty to behave as a trusted third party. This confidence will grow if you constantly ensure that you act with integrity, honesty and loyalty. SYSTRA managers also have a duty to set an example to promote these attitudes throughout the Group.

This code presents all our ethical commitments. They apply to the entire Group staff everywhere in the world. Each employee must respect the rules of this code. Any employee who breaks these rules may face disciplinary sanctions, or even criminal sanctions, in accordance with applicable law.

CONFIDENCE IS FUNDAMENTAL IN THE RELATIONSHIP BETWEEN SYSTRA AND ITS CLIENTS, ON THE ONE HAND, AND OTHER STAKEHOLDERS IN PROJECTS IN WHICH WE ARE INVOLVED, ON THE OTHER HAND.

SYSTRA encourages all staff to inform their line manager, the directors concerned or the Ethics Directorate, if they have any difficulty implementing these commitments, or if they know of any situation liable to violate these commitments.

We remind you that SYSTRA undertakes to protect any whistleblower. Whistleblowers must have the guarantee that confidential, objective and in-depth investigations will be carried out by people who are attentive to their difficulties.
All employees of the Group shall cooperate fully with internal or external audits and investigations launched by us or by other authorities.

I am counting on every one of you to promote these ethical commitments in-house and externally, in all our dealings with clients, business partners and any other stakeholders. You are the ambassadors and guardians of these commitments.

Confidence moves the world!

Pierre Verzat
Chief Executive Officer

Two questions to Jérôme Hernot
Group Compliance Officer

Who is SYSTRA's Code of Ethics for?

The SYSTRA's Code of Ethics is the reference document for all Group employees worldwide.

It is the responsibility of each employee throughout the Group to understand, respect and implement in his or her activities the rules and best ethical practices set out in this Code.

The managers of all entities are responsible for its proper dissemination, understanding and implementation, which involves:

- referring to it regularly with their team members to ensure that it is properly understood
- encouraging employees to raise any concerns in confidence
- recalling the alert procedure and reffering, if necessary, to the Group Compliance Officer
- ensuring strict compliance with the Code of Ethics by the employees for whom they are responsible
- having exemplary conduct themselves.

Our Code of Ethics is also addressed to our business partners
(clients, co-contractors, subcontractors, service providers, suppliers) by reminding them of our expectations of them in terms of behaviour and ethics. It is up to us to check that they apply standards equivalent to ours, in particular regarding their employees, and, if necessary, to remedy any shortcomings.

More generally, our code is made public to all our external stakeholders: authorities, clients, partners, subcontractors, suppliers and shareholders. It commits the Group to each of them.

How to use SYSTRA's Code of Ethics?

At SYSTRA, each of us acts out of conviction before acting out of duty. Our values therefore has a twofold vocation: to make explicit our values and our mission, and at the same time to specify what we consider, beyond law and regulations, to be unacceptable in the context of our activities. When the framework is clear, the ethics of responsibility can be deployed.

Some situations are difficult to manage as they involve much more than simply complying with a set of rules, they may be ambiguous and sometimes require personal courage.
When in doubt about an orientation, our Code of Ethics allows each employee to return to the fundamental meaning of our action: to ensure our clients an independent and relevant consulting, and to find the criteria for acting with integrity by questioning the situations encountered in the course of his or her professional activity.

When in doubt, ask yourself the following questions:

- *Am I in violation of a law, the Code of Ethics, Group policies and procedures?*
- *Am I consistent with the Group's ethical rules?*
- *Do I behave with others as I would like them to behave with me?*
- *Do I owe anything to anyone?*
- *Is my partner's behaviour consistent with the Group's ethical rules?*
- *Would my decision seem improper if it were published on the front page of a newspaper?*

IF YOU ARE CONCERNED ABOUT THE ANSWER TO ANY OF THESE QUESTIONS, DON'T KEEP IT TO YOURSELF, TALK ABOUT IT!

Integrity and compliance with law in our activities

PROHIBITING CORRUPTION AND INFLUENCE PEDDLING

SYSTRA does not tolerate any form of corruption or influence peddling.

Corruption occurs whenever a person asks for or accepts, directly or indirectly, unearned offers, promises, donations, gifts or advantages of any kind, for themselves or for anyone else in order to accomplish or abstain from accomplishing an action related to their position, assignment or mandate, or facilitated by their position, assignment or mandate. When the intention is to influence a decision, it is called influence peddling.

Our Group strictly forbids all forms of corruption or influence peddling, be it active (when the corrupter initiates the corruption) or passive (when the corruption is initiated by the person corrupted), direct (by a Group company or employee) or indirect (by an intermediary, a co-contractor, subcontractor, supplier, etc.) when working with clients and partners, and regardless of the amount involved.

We may also be held liable for acts performed by our business partners. Thus, we never make payments to partners, subcontractors, suppliers, consultants, agents or other intermediaries if we know, or have good reason to believe, that part of the payment will be used to corrupt or improperly influence a person.

For this reason, SYSTRA has laid down precise rules applicable to all employees of the Group, concerning gifts or invitations, facilitation payments, how to deal with conflicts of interest, political contributions, sponsorship, relations with our business partners (see the Anti-Corruption Code of conduct).

In practice:

- **Respect** all the anti-corruption laws of the countries where the Group works, keeping in mind the ability of some legal systems to cross borders to prosecute on their own territory an offence committed abroad
- **Refuse** to solicit, propose, receive or make a payment, a present, any special service or advantage, directly or indirectly, to incite a third party to give preferential treatment, to influence a commercial negotiation, the signature or execution of a contract, regardless of the outcome
- **Demonstrate** special vigilance in relations with administrations and public officials
- **Record** all presents or invitations in the on-line register
- **Apply** the Group's business partners due diligence procedure
- **Follow** the said rules regardless of the territory
- **Consult your line manager or Ethics staff**, if you have a question or doubt about how to apply the Group's rues and principles in a particular situation
- **Use** the ethics alert system to warn the Ethics Directorate of any situation with a risk of corruption or influence peddling (ethics@systra.com).

PREVENTING CONFLICTS OF INTEREST

The notion of «conflict of interest» refers to any situation in which the personal interests of an employee (family, financial, political, etc.) or one of his or her relatives could conflict with those of the Group. A situation of conflict of interest may also be described as a situation in which a legal person (SYSTRA or its subsidiaries) obtains, directly or indirectly, interests which are potentially contrary, and which may jeopardise SYSTRA's performance or impartiality in the execution of its obligations. This is referred to as a "positioning conflict of interest".

SYSTRA Group is exposed to this risk through its engineering and consulting activities. Indeed, such a situation may arise, in particular, during:

- the consultation phase (e.g. a subsidiary of SYSTRA that will be the project owner assistant in a tender where SYSTRA is participating directly or indirectly), or
- the execution of the contract (e.g. SYSTRA is acting as project manager and is in parallel asked to work as a subcontractor on behalf of an investor on works under the same operation).

The Group is particularly vigilant with regard to conflicts of interest, whether personal or specific to the Group's activities, because they may be of such a nature as to affect the impartial exercise of the duties and responsibilities, in particular the ability to make a decision in a loyal, independent, transparent manner and in the interest of the Group and of its clients.

Furthermore, an unidentified or concealed conflict of interest carries risks such as corruption, influence peddling, illegal taking of interests, collusion or favouritism, and can thus have significant commercial, financial and even criminal consequences.

In practice:

- For example, **employees must avoid the following:**
  - any direct or indirect interest in a competitor, supplier, subcontractor or client
  - to hold a personal financial interest in a transaction in which the Group is interested
  - to exercise a competing professional activity outside the Group
- **All employees must declare** in advance any existing or potential conflict of interest situation to their line management, which will take appropriate measures
- **Any situation that may cast doubt** on the impartiality of the Group in the performance of its services must be brought to the attention of the Legal and Ethics Directorates, which will analyze the situation and propose appropriate solutions to prevent any risk of conflict of interest
- **If in doubt about a situation,** consult the Group Compliance Officer or the Legal Directorate.

RESPECTING COMPETITION LAW

Almost every country where the Group works has laws to control competition (called 'anti-trust laws'), designed to guarantee open and loyal competition in the interest of users.
These laws concern us directly. Each Group employee must make sure they respect them to the letter.

SYSTRA strictly forbids all anti-competitive practices.

Any infringement of competition rules could damage the Group's reputation and image, incurring severe financial sanctions and exclusion from public procurement.

Staff are therefore expected to be very careful in their contacts with our competitors, clients, suppliers and subcontractors, especially when preparing bids. No Group employee can have any links with a competitor, even if it is an occasional partner, to reduce or distort competition. This applies to price fixing, a choice of organisation in order to reduce competition, the allocation of contracts or clients.

In practice:

- **Avoid** any contact or exchange of information on topics such as:
- prices, bid coordination
- allocation of contracts or clients
- costs, profits, profit margins
- the contents of existing or planned agreements with suppliers, subcontractors co-contractors or clients. Any agreement to collaborate or form a consortium with a company that would otherwise be a competitor, must have clear limits and conditions to control the exchange of information, defined with the Legal Directorate

- **Take particular** care during casual discussions at conferences, meetings of professional associations or similar events, to prevent any risk of transgressing the rules governing competition
- **Avoid** any discriminatory practice involving suppliers or subcontractors
- **Avoid** denigrating a competitor
- **Never use** illicit methods to gain information about our competitors' activity,
- **If you are in any doubt** about these complex rules, speak to your line manager, the Legal Directorate or the Ethics Directorate.

FORBIDDING FAVOURITISM

Favouritism is a crime that consists of giving someone else an unjustified advantage, flouting the rules governing public contracts. It could occur at any stage of a contract: preparation, awarding, execution, including for a concessionary contract. To be precise, favouritism is the word referring to the crime of 'granting an unjustified advantage' in the frame of a public contract.

SYSTRA strictly forbids any form of favouritism.

The activity of SYSTRA may lead certain employees to work on behalf of a client, preparing an invitation to tender, and/or assessing bids. In such a case, **it is really important to ensure open access to the invitation to tender, frank decisions, absolute fair play for all competitors whoever they are.** While executing the contract, it is important to act impartially to all parties.

For example, while preparing an invitation to tender for a client, no employee can artificially divide up a contract to avoid thresholds, include technical specifications or allocation criteria in order to favour one particular contractor.

Equally during a tender process, employees must not communicate privileged information or seek to influence unduly a client's choice. Similarly, during the execution of a contract, the employee must not accept any undue validation of a deliverable, overcharging, non-application of late penalties.

In practice:

- **Remain impartial and objective** while participating in procurement phases, writing of tender documents and selecting contractors
- **While performing services,** always refer to the conditions of the contract and apply them scrupulously
- **If you encounter any difficulty**, speak to your line manager, the Legal Directorate or the Ethics Directorate.

PROHIBITING FRAUD

Fraud means deliberately misleading someone else to obtain an undue advantage. Falsification, dissimulation, deformation and some kinds of theft are examples of fraud.

The Group strictly forbids any kind of fraud, whether it concerns the accuracy of documents provided, information shared, or the sincerity of declarations made. SYSTRA Group pays special attention to ensuring that information is accurate in the curriculum vitae and commercial references submitted with our bids.
Combatting fraud is also part of SYSTRA's commitment to respect the terms of our contract, and to invoice clients only for our services correctly carried out.

Similarly, SYSTRA Group takes special care to respect the intellectual property of third parties. This excludes any kind of illicit appropriation of material protected by such copyright (counterfeit), whether it belongs to clients, suppliers or third parties.

SYSTRA Group is equally vigilant to ensure that entries into accounts are accurate and sincere, comply with IFRS standards, along with the accuracy of fiscal declarations and related payments, and the compliance with the anti-money-laundering legislations and the international or national sanctions against some countries, companies or individuals.

In practice:

- **Acting** in all circumstances with honesty, common sense and with care for the reputation of the group
- **Respect** the laws of the countries where SYSTRA is working, particularly fiscal and public procurement rules
- **Never falsify**, hide or distort a document or information
- **Provide** only clear, sincere and truthful documentation, especially when submitting expense claims
- **Write** only accurate and verified information in curriculum vitae and commercial references
- **Do not use** material protected by the intellectual property rights of third parties, without checking that SYSTRA is allowed to do so by a licence or transfer of rights. This applies especially to the use of software, texts and images created by third parties
- **If you have a question or doubt** about how to apply the Group's rules and principles in a particular situation, consult your line manager, the Legal or Ethics Directorates
- **Use** the ethics alert system to warn the Ethics Directorate of any situation involving suspected fraud (ethics@systra.com).

PROMOTING HUMAN RIGHTS

For SYSTRA Group, mobility and transport have to be factors of inclusion, promoting freedom and creating opportunities for all. By providing access to mobility, SYSTRA aims to strengthen social ties and bring people closer together by improving access to employment, education and leisure.

Thus, we consider as much as possible the social and political impacts associated with our projects.

Moreover, SYSTRA Group is particularly vigilant with:

- compliance with the fundamental conventions of the International Labour Organization, in particular:
  - the prohibition of child labour: SYSTRA does not employ, in any way whatsoever, any person under the minimum age required for work under the applicable national legislation or ILO conventions 138 and 182, it being understood that the higher age of these references is considered here
  - forced labour: SYSTRA does not use forced labour. The definition of forced labour, provided for in ILO conventions 29 and 105, includes work carried out under the threat or as a result of coercion of political prisoners, the requisitioning of labour for purposes of economic development, compulsory labour as a measure of labour discipline, punishment for participating in strikes, or as a measure of racial, social, national or religious discrimination
  - respect for freedom of association.

- the right to health: SYSTRA implements a health protection system guaranteeing compliance with the regulatory requirements applicable to it. SYSTRA ensures that its activities do not harm the health of its employees, subcontractors and neighbouring populations
- the promotion of diversity
- the respect for the right of peoples to dispose of their natural resources.

In practice:

- **SYSTRA Group** pays attention to the impact of projects so that the infrastructures we work on encourage people to come together and are tools for integration rather than exclusion.
- **SYSTRA Group** applies the principles defined above to itself and requires its subcontractors and co-contractors to respect them as well.
- **SYSTRA Group** encourages all its employees and stakeholders to act in this way and to report to the Group Compliance Officer (ethics@systra.com) any problematic situation within the Group or in the environment of our projects.

Respect for persons

PROTECTING OUR STAFF AND SUBCONTRACTORS

The consequences of SYSTRA's activity, in terms of health, safety and security (3S), are necessarily at the heart of our Group's sustainable development. There can be no confidence in sustainable growth without safety.

We are therefore determined to contribute to a safer world for all our stakeholders and, of course, first and foremost for everyone working directly for SYSTRA.

In this area, our commitment is simple: to protect our employees and, in all circumstances, our subcontractors and everyone under SYSTRA's direct responsibility. This means ensuring their physical and mental health, safety and security whatever their missions, projects and sites.

As a direct extension of our business ethics, SYSTRA's 3S policy naturally also covers all our other stakeholders. Through our study and design works we protect the future operators and passengers on our transport solutions.

Through our construction and testing supervision, we contribute to the protection of contractors' staff and residents near construction sites.

SYSTRA's policy also serves to protect the information in our keeping. This goes for information about our staff, information produced by SYSTRA or entrusted to us by our clients.

In practice

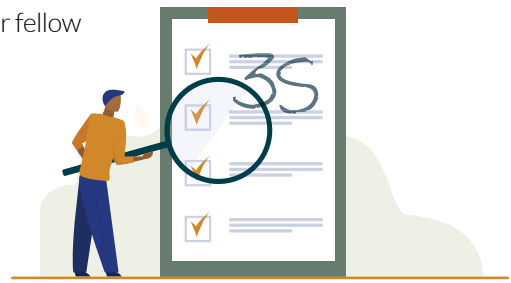
Every SYSTRA employee and manager knows, adopts, applies and promotes our 3S policy in their field of responsibility and their surrounding professional environment.

- **100% ACTIVE:** everyone knows, applies and promotes SYSTRA's 9 life-saving rules. In particular, each person must stop any professional activity that threatens to cause an immediate danger to their own or anyone else's life directly, or else make sure it is stopped.

- **100% VIGILANT:** everyone must strive to provide all the resources required to protect health, safety and security, so that they are fully aware and in control of risks as they make decisions and operate. Every employee must assess anything that could damage the physical and mental health of the people under their responsibility. They must identify and implement suitable protection measures to deal with physical or psycho-social risks. If there are any unacceptable residual risks, they must postpone the activity until the risks have been fully brought under control. Each employee must plan risk prevention and emergency measures, before beginning any activity.

- **100% KEEN TO LEARN:** mistakes can happen. Acting negligently despite clear instructions, deceit, failing to learn from our mistakes: all of these are unacceptable. Every one of us must anticipate, report and manage incidents and dangerous situations. Everyone must learn systematically the lessons of the dangerous incidents and situations that are discussed openly within the company.

- **100 % READY TO TAKE THE LEAD:** according to our level of responsibility, each of us sets an example to improve all behaviour, decisions or activity relating to health, safety and security in our immediate surroundings, particularly for anything affecting our fellow workers, partners and clients.



COMBATTING COERCIVE PRACTICES

Coercive practice means impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to influence improperly the actions of such party.

SYSTRA strictly forbids any kind of coercive practice by our employees. We encourage all staff to inform the 3S Directorate or the Ethics Directorate of any undue coercion or threat of coercion that they have suffered or witnessed. During our professional activities, we may have to deal with coercive practices from within or outside the company. Here are some examples:

- a manager obliges one of their employees to resign,
- one employee threatens another, to prevent the latter from reporting a fraud committed by the former,
- the employee of a manufacturer threatens a SYSTRA employee, trying to force them to approve a deliverable.

In practice:

To reduce the risk of coercive practices, we particularly recommend:

- **Encouraging** dialogue and acting courteously
- **Explaining** clearly and objectively, preferably in writing, any decision or attitude
- **Reporting** any emerging complication to your line manager (and/or the Health, Safety and Security Directorate or the Ethics Directorate depending on the level of criticality)
- **Systematically informing** 3S or Ethics staff of any coercive practice (ethics@systra.com),
- **Bearing in mind** that SYSTRA is always ready to help employees, to ensure that their working environment complies with rules for ethics, health, safety and security. No employee ever has to deal with such practices alone.

FORBIDDING ANY KIND OF HARASSMENT

According to the International Labour Organization, the term "violence and harassment" in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in or are likely to result in physical, psychological, sexual or economic harm, and it includes gender-based violence and harassment.

No form of violence or harassment (physical, moral or sexual etc.) is tolerated within the Group.

The SYSTRA Group undertakes to:

- prevent and eliminate all violence or harassment in the work environment
- involve and empower all company stakeholders to prevent violence or harassment
- provide victims of violence or harassment with the means to inform or defend themselves
- enable victims of violence or harassment to have recourse to a procedure for dealing with their situation
- prevent psycho-social risks and promote wellbeing in the workplace.

In practice:

- Programmes to prevent psycho-social risks, violence and harassment must be drawn up, and provided with measurable objectives if necessary
- The Group takes all the precautions necessary to protect the physical or mental health of staff as well as their dignity in the workplace. It thereby intends to provide staff with a workplace that is free from violence, intimidation, hostility or disrespect, to offer effective protection to victims of moral harassment and to witnesses of such situations
- Each employee of the Group is duty-bound to ensure that their behaviour in no way detracts from the dignity, sensibility or health of their colleagues, nor compromises their professional future. According to their skills and training, staff are also committed to helping find and implement measures to prevent harassment
- Any person who considers that he or she has been harassed can, by any means, contact the Human Resources Directorate or the Ethics Directorate, at local or Group level. An investigation will be conducted independently and confidentially.

FORBIDDING ANY DISCRIMINATORY BEHAVIOUR AND PROMOTING DIVERSITY

Any form of discrimination based on origin, gender, religious beliefs, age, disability, sexual orientation or union membership, as well as any other form of discrimination, is totally prohibited within our Group.

Valuing talent through the constant maintenance of a culture of openness, integration and dialogue is one of our Group's strengths and one of the guarantees of its development and success.
We are proud of our diversity and, in all circumstances, must promote it.
Equal opportunity is a reality within our Group: the professional evaluation of employees within our teams and the criteria for selecting candidates for recruitment are based solely on merit, results or performance and on skills, professional experience and personal aptitude.
Each employee must contribute to maintaining a healthy and creative work environment, where relationships are marked by mutual respect and courtesy, and where dialogue is open.

In practice:

- **Prohibit** all forms of discrimination and respect others, behaving with others as one would like to behave with oneself
- **Comply** with labour laws and regulations in all countries in which the Group operates
- **Be open-minded** and promote an environment and culture of dialogue, diversity, integration and mutual trust
- **Denounce** and reject stigmatising practices, racism and sexism

- **Awareness raising** and training are provided for all staff, particularly all managers involved in recruiting, training and career management
- **Conducting internal**, anonymous, and ongoing opinion surveys in order to perceive the progress and difficulties of the sense of inclusion within the Group
- **Any person** who believes that he or she is a victim of discrimination may contact, by any means, the Human Resources Directorate or the Ethics Directorate, at the local or Group level. An investigation procedure will be conducted independently and confidentially.

PROTECTING PERSONAL DATA

Personal data is information about a person, which could serve to identify them directly or indirectly.
For example, the following are personal data: a name, a postal address or e-mail (including a professional one), an online log-in, data about location, economic, cultural or social data about a person.

The Group undertakes to respect the following principles concerning all personal data:

- Personal data are only ever processed lawfully and in a transparent manner in relation to the person concerned
- Only data that are strictly necessary for a legitimate and specified purpose are processed
- Only accurate and updated data are processed
- Data must not be held any longer than is needed to achieve their purpose, or for the duration provided under applicable law
- Data being processed are protected by technical and organisational measures to guarantee their integrity and confidentiality.

The Group also undertakes to respect the rights of the persons concerned, especially their rights of access and rectification.

For this purpose, SYSTRA has established internal rules to guarantee the protection of personal data, and to respond to requests, made by employees or any individual whose data is processed by SYSTRA, to exercise their rights (please refer to the "Personal Data Protection Procedure").

In practice:

- **Respect** the laws about protecting personal data in the countries where SYSTRA works
- **Respect** internal procedures, and principles applicable to all processing of personal data
- **Do not process** sensitive data, except in special circumstances with due justification
- **Inform** SYSTRA's Data Protection Officer (DPO) about any new processing of personal data, so that it can be registered in the record of personal data processing (personaldata@systra.com)
- **Transfer** immediately to the DPO any request made by an individual wishing to exercise his or her rights
- **Inform** immediately the DPO about any breach of personal data.

Respecting, speaking up and alerting

COMPLIANCE WITH THE CODE OF ETHICS

We must all ensure the proper application of the Code of Ethics. Any violation of this Code of Ethics may result in disciplinary sanctions for the employee concerned, without prejudice to any legal action that may be taken by the Group.

Appropriate sanctions and proceedings will be those provided for by the law applicable to the employee concerned and will be taken in accordance with legal procedures.

In compliance with applicable law, such sanctions could include, in particular, dismissal for misconduct and claims for damages at the Group's initiative.

SPEAKING UP

The SYSTRA Group encourages a climate of dialogue enabling everyone to express their questions and concerns about our Code of Ethics.

Do not remain in doubt!

If you have any questions about this Code of Ethics, need an advice or if you are in doubt about a situation, we encourage you to contact as you prefer:

- your line manager
- the human resources manager of your entity
- the Compliance Officer of your entity or the Group Compliance Officer (ethics@systra.com)
- one of the members of the Group's Ethics Committee.

The person you will refer to will treat your request with kindness, objectivity, confidentiality. If such a person is not in a position to answer you, he or she will direct you to the appropriate entity or department according to its purpose.

SYSTRA's ethics network:

* **The Group Compliances Officer manages a network** of local compliance officers and compliance managers in charge of the various group entities.
He informs the Directoire in writing of any difficulties he encounters and of progress in the conduct of the ethics programme. He attends meetings of the Audit Committee of the Supervisory Board.

* **The Ethics Committee** is the body in charge of handling ethical issues and assisting the Group Compliance Officer and the Directoire. It is composed of employees representing various entities of the Group and examines cases with diligence, discretion and objectivity. It also contributes to the definition and implementation of ethical measures for the entire Group.
The list of its members is available on the "Ethics" page of MySYSTRA.

ALERTING

If you have knowledge of a situation or fact that could constitue a breach of the Code of Ethics, do not hesitate to alert the Group Compliance Officer (ethics@systra.com).

In accordance with SYSTRA's ethics alert process, the identity of the whistleblower is protected and remains confidential. The Group does not tolerate any retaliations against an employee who shares in good faith his concerns about the application of the Code of Ethics.

Your help is precisous in making SYSTRA a signature team, including in terms of ethics.

Anyone outside SYSTRA may also contact the Group Compliance Officer with any questions or concerns relating to the application of the Code of Ethics by writing to: ethics@systra.com

For any question regarding personal data, anyone may contact the DPO by writing to: personaldata@systra.com

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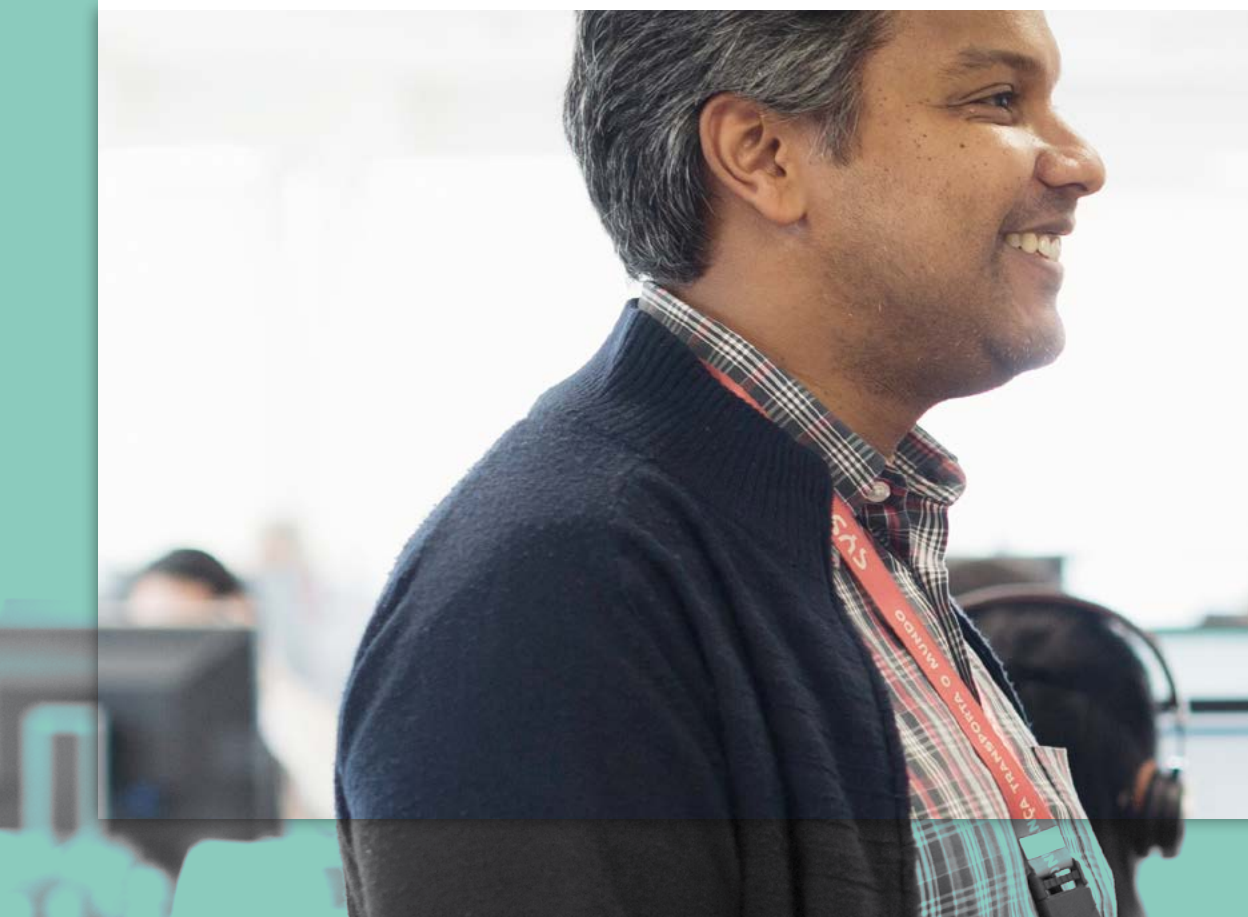
CONFIDENCE MOVES THE WORLD

SYSTRA

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