



axon'



CODE
OF ETHICS

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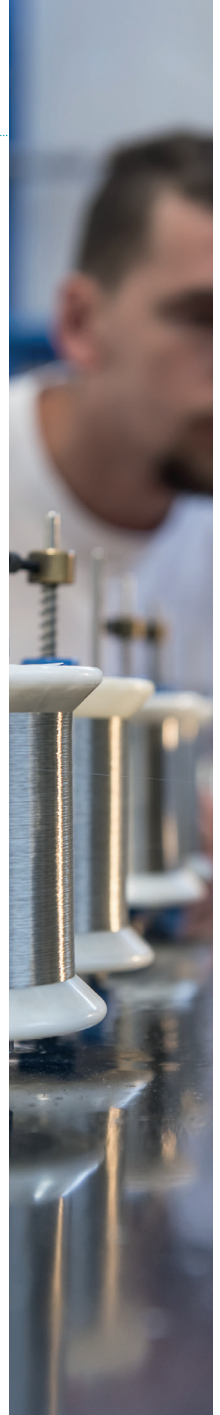
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INTRODUCTION



For more than half a century, AXON' has chosen to be a responsible and trustworthy company.

The AXON' Axiom is the construction of a [perennial company](#). This requires long term relationships with all of our relevant stakeholders in accordance with ethics, moral values and in full awareness of our social responsibility.

AXON' direction deems appropriate to remind everyone, by this code of ethics, its values.

This code is intended for Axonians, employees of the AXON' group, of all the group's subsidiaries to follow it.

It is also intended for all our stakeholders as it reminds our ethical expectations in their respect.



AXON' AXIOM

II BUILDING A SUSTAINABLE COMPANY

Our corporate vision is based on the AXON' Axiom "building a sustainable company". We want our company to be still in place for the next 50 or 100 years thanks to our 5 core values:

- I ■ We want **AXON' Ethics** to be the same as universal values: «Human Rights, Labour Law, Environment, Anti-Corruption»), promoted by the United Nations Global Compact. We respect the law in all countries in which we operate. Respect for these values is essential to ensure our sustainability.
- 2 ■ We want to build **long-term relationships** with all our relevant stakeholders: our customers, our providers, our employees... Long-term relationships are the most effective and beneficial between parties.
- 3 ■ We want to be a **Solution Provider** for our customers, offering them co-engineering. In order to offer both innovation and speed, our strategy is to provide ever more efficient products and to strengthen our vertical integration, so that any solution we propose will satisfy the quadriptych: "High Technology, High Quality, Fast Service, Competitive Cost".
- 4 ■ We want to encourage **progress of our employees** by strengthening their knowledge and skills through training and by assigning them into small learning teams. Ensuring a Quality of Life at Work that contributes to their Health and Safety at Work is an essential goal.

5 ■ We aim to achieve **financial independence** through development in growth markets such as space and Asia, with objectives of overall progress, earnings and short-term debt reduction, in order to ensure company's sustainability. In order to achieve these objectives, we want to control our costs during the design of solutions and during their production.



RESPECT

■ Respect for individuals

The recognition and respect of human rights are widely considered essential to the principle of legality and social justice and equity concepts, but also as one of the fundamentals for the various institutions of society. That is why AXON' makes it a duty and responsibility to respect, protect, enforce human rights, as well as an anti-slavery policy and fight against child labour.

Everyone's freedom must be respected, in a perpetual duty of vigilance, including our stakeholders to avoid any risk of complicity, even though confidentiality may sometimes be appropriate.

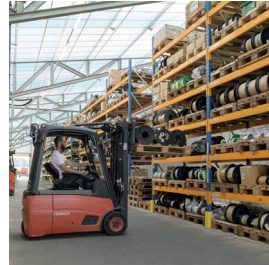
■ Compliance with the law

As no one is above the law, AXON' respects all the laws of countries where the group is established. In each of them, the strictest legislation is preferred.

Thanks to continuous regulatory monitoring, all European regulations are taken into account as soon as they are published, such as the GDPR (General Data Protection Regulation).

Internationally, similar precautions are applied. For example, as far as our imports and exports are concerned, the American ITAR rules (International Traffic in Arms Regulations) and the Dodd Frank Act (consumer protection and conflict minerals abolition) are strictly followed by Axon'.

Beyond the regulatory aspect of tax and rules and respect for human rights, AXON' is voluntarily committed to an international certification policy, in particular on the ISO 9001, 14001 and 45001, EN9001, IATF 16949 management standards, as well as an "E-engaged CSR" recognition (Corporate Social Responsibility in connection with ISO 26000). AXON' has also many logistics sites AEO certified (Authorized Economic Operator).



■ Local customs respect

In each country where the AXON' Group is established, social and cultural traditions of the communities with whom we trade are considered in the respect of everybody.

In addition, AXON' is involved in community projects, such as patronage, in order to participate in local development and be a local player in its geographical area.

OUR COMMITMENT TO OUR CUSTOMERS



OUR BUSINESS CONDUCT

Always concerned to respect its commitments, and to meet the needs and expectations of its internal and external customers, AXON' seeks in particular to share its values by promoting collaboration in accordance with ethical principles and good business relations.

For that reason, AXON' is committed to:

- Animate and maintain a good relationship with its business partners, ensuring the protection of confidentiality and intellectual property,
- Guarantee equal treatment, based on objective and impartial criteria, on a total rejection basis of all forms of corruption and of influence peddling,
- Guarantee the use of relevant means in the evaluation and choice of its providers, by assessing the total purchase cost for expected products, services and equipment delivered in line with expectations and needs of its internal and external customers,
- Be proactive, in compliance with applicable laws, directives and regulations,
- Participate in continuous improvement integrating a performance follow-up of providers focused on the respect of the deadline and the conformity of the product and its deliverables, opportunity and risk analysis,
- Anticipate as early as possible the evolution of environmental and other regulatory requirements, in its sustainable development approach and for responsible purchasing,
- Ensure financial equity regarding its business partners,
- Focus on discussion in problem solving.

By being committed to the values and principles it stands for, AXON' responsibly promotes fair, loyal and long-term relationships, in accordance with our anti-corruption procedure.



OUR PRODUCTS



OUR CORE
BUSINESS: COMPETITIVE ADVANCED
INTERCONNECT
SOLUTIONS.



AXON' is specialized in the design and manufacture of custom-designed interconnect solutions:

- Wires and cables: the Group is specialized in the manufacture of high-precision conductors with high-performance insulations such as fluoropolymers PTFE, FEP, PFA, ETFE and polyesters, polyimides, etc.
- Contact and connectors.
- Cable-assemblies and harnesses.
- Integrated systems and mini-systems.

Expert in cabling engineering and prioritizing innovation, AXON' is able to design the complete cabling structure. AXON' engineers assist customers with appropriate tools such as simulation and co-design softwares throughout the development process: ideas, concepts, prototypes, industrialization,

scale-up and mass production. AXON' provides custom-designed solutions according to the principles of Lean Engineering and Lean Manufacturing.

By combining the different expertises of its subsidiaries (Metallurgy, Plastics, Electronics) and its Research & Development, AXON' is able to:

- Offer complete interconnect solutions,
- Optimize the production workflow,
- Provide its customers with turnkey solutions.

AXON' interconnect solutions meet the most rigorous requirements such as weight and space saving, miniaturization, electromagnetic protection, harsh environment, sterilization, biocompatibility, flexibility...

Based on an ISO 9001, 14001 and 45001 quality organisation and according to the requirements of ISO 13485, EN 9100 and IATF 16949, AXON' bases its purchasing strategy on the delivery of products, equipment and/or services that fully comply with control standards while respecting legislations, directives and regulations relating to the supply chain duty of care.

AXON' PRODUCTS ARE DESIGNED
FOR HIGH-TECH MARKETS SUCH
AS AERONAUTICS, AUTOMOTIVE,
ELECTRONICS, ENERGY, INDUSTRY,
MEDICAL, MILITARY, RESEARCH
AND SPACE.

Traceability and control of our proposed products origin allow us to fight against counterfeiting and to ensure their design and development quality.

As counterfeiting is contrary to our vision, we are committed to fight it. This commitment means being involved at all levels of the manufacturing chain, from design (patents, copyrights, drawings, brand names...) to production.

This commitment means a commitment from all our stakeholders:



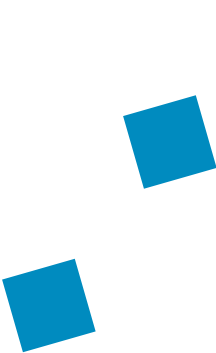
- Our employees, whom we sensitize,

- Our suppliers from whom we ask for a commitment in this fight,

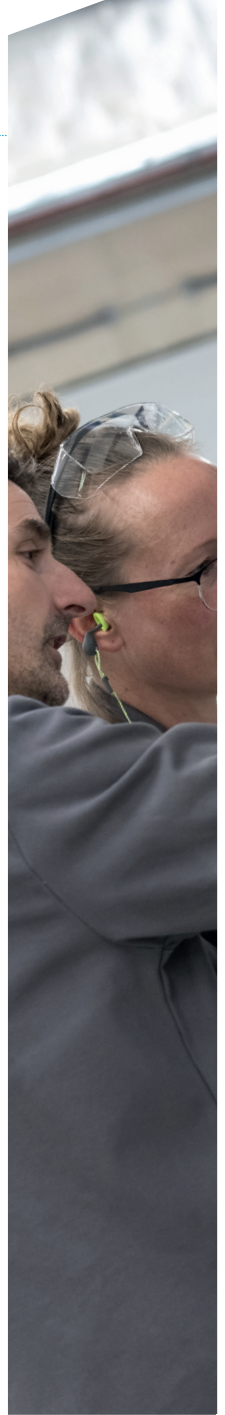
- Public authorities such as Customs or Directorate General for Competition, Consumer Affairs and Fraud Control, whom we involve,

- Our customers, for whom we have complete transparency.

We guarantee a strict follow-up of our customers' returns and complaints. In the event of a possible or proven impact on security, we react immediately by communicating explicitly and transparently.



OUR
COMMITMENT
TO
EACH
OTHER



MUTUAL RESPECT

The company is not only the place of an economic transaction, but also of a social exchange. The “well-being” at work contributes to the improvement of individual and collective performance.

This is why AXON’ advocates professional fulfilment while respecting the Fundamental Principles and Rights at Work.

Moderate use of messaging tools is recommended in order to maintain an open dialogue and human interaction. Messages should be short and clear in order to avoid information overload that can hamper efficiency.

Moreover, encouraging team spirit implies solidarity, availability, exchange of experience and sharing of knowledge. It encourages the transmission of knowledge and skills and allows everyone to progress in mutual respect.

For AXON’, promoting social dialogue contributes to a quality working environment and thus encourages initiative by giving free rein to everyone’s creativity.

Everyone at AXON’ has access to the reporting collection procedure and whistle-blowers are protected under the law.



PRIVACY AND DATA CONFIDENTIALITY

According to the right to disconnection, no employee is obliged, outside his

or her actual working hours, to consult or answer his or her e-mails, messages and business calls. This is why Outlook training includes learning how to use the out-of-office auto-reply message. The occupational medical check-up and the Company's Integrated Management System now includes a questioning on the use of digital tools. The data confidentiality policy implemented at AXON' enables us to control, manage and monitor the protection and modification of everyone's personal information, in accordance with the General Data Protection Regulation (GDPR). Thus, everyone can access to their private data with a right to correct inaccurate information and the right to limit their broadcasts.



DIVERSITY AND INTEGRATION

The wealth comes from the multitude of different soft skills and know-how and a variety of competencies. Encouraging the development of employees' abilities means enabling them to evolve at the same pace as their job, ensuring their professional fulfilment, and even broadening their general knowledge.

The strength of a company lies in its men and women, with all their differences and the ability to allow them to coexist within the structure without discrimination.

One of AXON's priorities, which contributes to its success, is to develop social and cultural diversity, and to practice equal opportunities for our employees within teams integrating young people, seniors, disabled people, etc.

A disability unit within AXON' is always ready to listen to each individual in order to recognize potential deficiencies and improve working conditions. With all the group's French subsidiaries, we have also signed a "France Group" agreement pro employment and in favour of job retention of disabled workers.

An international agreement signed by AXON' aims to create a synergy between the different generations: in fact, the contribution of new knowledge from young people and the experience of seniors is a source of innovation, which is essential for a company working in the high technology field.



PEOPLE REPRESENT ONE OF
THE ASSETS OF OUR COMPANY
WHERE THE TRANSMISSION OF
KNOW-HOW AND INTERPERSONAL
SKILLS IS VERY IMPORTANT.

HEALTH, SECURITY AND SAFETY

By being ISO 9001, 14001 and 45001 certified, AXON's Integrated Management System (IMS) ensures significant compliance with health, safety and environmental regulations.

By anticipating risks using quality tools, each stakeholder at AXON' is aware of his or her actions. Emergency procedures are continually updated and thus guarantee the safety of everyone, whether it is on a physical or psychological level, protection against theft, sabotage, espionage, piracy, counterfeiting, etc.

Every AXON' staff member is aware of the safety instructions and means of protection (individual, against fire, etc.) and is required to comply with them, failing which they may be liable to penalty.

In the event of failure to comply with these essential rules, our company ensures the protection of whistle-blowers who have at their disposal a procedure for collecting alerts.



HARASSMENT AND VIOLENCE AT WORKPLACE

No employee should be subjected to harassment of a sexual or moral nature or to violence at workplace. Should such an act occur, the employee must alert the company and therefore will not be punished for testifying against this type of behaviour.

On the other hand, an employee who has carried out acts of harassment or violence is liable to severe disciplinary sanctions in accordance with the law.

OUR COMPANY COMMITMENTS



COMPANY REPRESENTATION

Each of us represents the company. That is why it is important not to confuse the interests of our company with personal opinions or interests. By promoting the general interest, we all contribute to the positive image of the company. It is by harmonising this image that together we will strengthen AXON's sustainability.

CONFIDENTIALITY

Any document or file relating to the production lines, their operation and adjustment is strictly confidential. Any copy or extract can only be made by the Maintenance Manager or with his authorization.

Any process (material, machine tool, production line) or project or product destination name is strictly confidential. None of these names must appear on a technical specification, design or drawing intended for distribution to a supplier. If necessary, supplier, project or program number will be used.

Any exception to this rule must be validated by the Direction.

The supplier names must not be release, either orally or in writing. Authorization for disclosure may only come from the Purchasing Manager or the Direction.

A confidentiality contract submitted by the Purchasing Department must be signed with a supplier before any transmission of information relating to the lines, manufacturing parameters and characteristics of the products used.

The internal documents of the QSE system (Quality-Security-Environment) can be consulted on site during audits. Some confidential aspects are deliberately blurred. Extracts may be communicated subject to validation by the QSE manager or his delegate.

For that reason, everyone must act with caution, discretion and loyalty. Indeed, all employees are obliged to respect the confidential nature of the information, either personal or concerning the company, which is communicated to them as part of their work. The misappropriation and communication to third parties of confidential documents regarding the company is prohibited.



COMPANY ASSETS PROTECTION

Phones, computers, internet connections, vehicles, etc. are made available to employees but are reserved exclusively for professional activities. Exceptional uses may be tolerated by the company when they are of an emergency nature.

Everyone should preserve and protect the resources belonging to the company and return them in good condition in the event of termination of an employment contract.

CONFLICTS OF INTEREST

A conflict of interest situation arises when an individual or organization has to manage several competing interests, at least one of each could corrupt the motivation to act on the others. The conflict of interest can then potentially call into question the neutrality and impartiality with which the individual must carry out his or her mission because of his or her personal interests. If such situation occurs, his or her superior should be informed.

INSIDER TRADING

No insider trading or any offence committed by a person using insider information in his or her possession to make profitable financial transactions is authorised within AXON'.

OUR CIVIC COMMITMENTS



CHOICE AND FAIR TREATMENT OF OUR PROVIDERS

It is important for AXON' to share its values by promoting a collaboration with suppliers of products, services and equipment in the respect of ethical principles in the business relationship.

This is why AXON' undertakes to use relevant means in the evaluation and the choice of its suppliers and by guaranteeing equal treatment based on objective and impartial criteria.

AXON' ensures financial equity towards its business partner and guarantees payment deadlines.

We foster and maintain relationships of quality and trust with our suppliers by ensuring the protection of confidentiality and intellectual property while avoiding any situation of dependency.

RESPECT OF OUR COMPETITORS

We treat our competitors as we would like them to treat us: with courtesy, without criticism or plagiarism, refusing any kind of espionage. This respect helps us to differentiate and improve in our industry.

ACCOUNT TRANSPARENCY, TAX COMPLIANCE

Axon' publishes its accounts every year in true transparency and guarantees their perfect accuracy, fully in compliance with tax regulation.

The archiving rules are strictly adhered according to each type of document.

CORRUPTION, BRIBES AND INFLUENCE PEDDLING

Solicitation or acceptance of gratuities, cash transactions or any other benefit is prohibited (unless expressly authorized, documented and recorded). Employees must not accept any gifts or other benefits from anyone outside AXON' without the authorisation of their line manager.

II

SOLICITATION OR
ACCEPTANCE OF
GRATUITIES, CASH
TRANSACTIONS OR
ANY OTHER BENEFIT
IS PROHIBITED.

The line between what is acceptable and what is not regarding gifts, entertainment donations and sponsorships is very thin. Common sense must be used and reflect upon: what is the value, how often, how embarrassing it would be if it is disclosed, how justified it is, how much influence it might have on the recipient.

II

If there is the slightest doubt, it must be considered unacceptable. Giving or receiving a gift or an invitation or a donation in an inappropriate manner may

place the AXON' company or its employees in breach of the anti-corruption legislation existing in the country. Similarly, it is not acceptable to participate in influence peddling.

For that reason, AXON' is committed to conducting its business fairly, honourably, with integrity and honesty by adopting a zero tolerance policy for corruption & influence peddling in all its activities.

It is therefore important to remember that the prevention, detection and reporting of corruption or influence peddling is everyone's responsibility. Indeed, risks incurred in the event of corruption or influence peddling are incurred by both the company and its employees.

ENVIRONMENTAL PROTECTION

AXON' has been committed to meet environmental challenges on a daily basis for many years:

- to define our Environmental and Energy Policy,
- to identify and know our Environmental impacts, created by the company's activity or our products,
- to act to limit, eliminate or mitigate our impacts.
- In addition, AXON' encourages collective commitment through its ISO 14001 certification and its energy management approach based on the ISO 14001 principles.

To achieve our environmental goals, we must protect resources, air, soil, water and biodiversity by:

- reducing our demand for resources, which means: Reducing our consumption of electrical energy and other energy, water and other resources, our production waste, green purchasing,



participating in the circular economy, maintaining our eco-construction, eco-management system, eco-design of our products and infrastructures to optimise the life cycle of our products;

- reducing GHG emissions, i.e. decarbonisation, eco-design of our products and equipment, green purchasing, improving our supply chain, protecting our carbon sinks;

- no pollution of the air, soil or water, which means: Eco-designing our products and equipment, improving the life cycle of our products, participating in the circular economy, treating our waste, addressing all accident risks;

- participating in the development of biodiversity, i.e. preserving our forests and vegetation areas, reducing outdoor lighting, avoiding noise pollution; and, to encourage our employees, service providers, customers and local authorities to play their part in this process.

This collective commitment is reflected in our ISO14001 certification, the completion of our energy audit and carbon footprint, including SCOPE 3, as well as our numerous voluntary participations in collective projects such as CYVISO and FRET21.

POLITICAL ACTIVITIES

AXON' is not involved in any political movement: no action or words could represent the company, nor use its resources. If the company's name were to appear in any political activity, AXON' would have to be clearly dissociated from any of these initiatives.

CONTRIBUTION TO THE COMMUNITY

With the help of its employee representatives of its CSE (French Social and Economic Committee), AXON' encourages its employees to participate in territorial events and to play an active role for the community. However, only actions decided by the company commit itself and the company could not be associated to them without its approval.

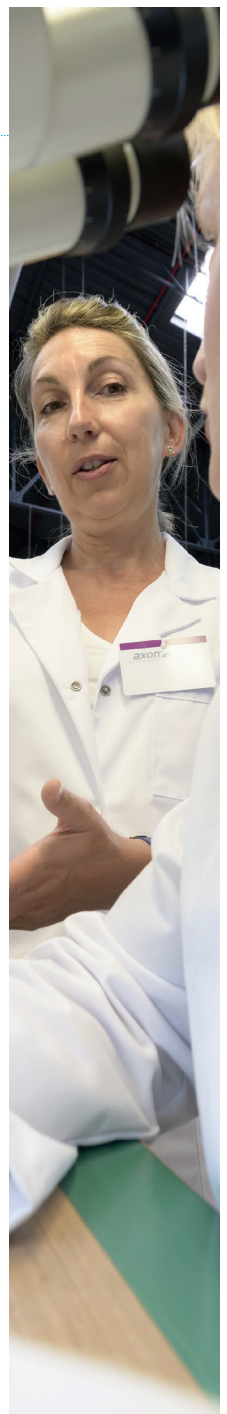


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AXON' ENCOURAGE
ITS EMPLOYEES
TO PARTICIPATE
IN TERRITORIAL EVENTS.

||

COMMUNI— CATION



WHEN IN DOUBT, LET'S COMMUNICATE

One of the foundations of a company sustainability and the guarantee of a committed social responsibility is communication. We practice this communication:

■ **Internally:** whether vertical, upwards, downwards, or horizontal, the dialogue must promote exchange and sharing between all employees and avoid conflicts. In order to avoid any misjudgement or filtering that can distort the message, the information must be clear, fluid and objective.

■ **Externally:** this communication is the source of our company's image. An exchange, declaration, dissemination, information or erroneous message can be detrimental to the reputation of our company. Maintaining a quality dialogue strengthens our positive image based on experience and competence.

Communication also involves reporting: in the event of non-compliance with rules and laws, whistle-blowers are in that case protected.

THE PARTICULAR ROLE OF THE MANAGER

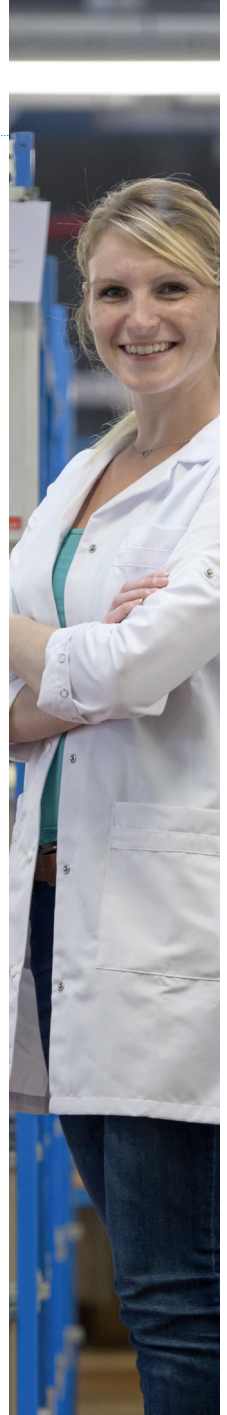
The role of the manager is to enforce a set of rules that define the framework of the collaboration (employment contract, internal regulations, mandatory postings, mission definition and job description, etc.).

He or she must be the guarantor of this framework by setting an example and it is his or her responsibility to ensure that each collaborator knows, accepts and respects it.

He or she can sanction or impose sanctions to a collaborator who does not respect this framework. He or she must establish a relationship based on trust, know how to listen and motivate its collaborators. Giving meaning to action by training, coaching and accompanying his or her team remains one of his or her priorities.



CONCLUSION



Launching new products on the market has to be done more and more quickly. It is no longer the "big" ate the "small" but the "fast" eat the "slow".

It is with this in mind that AXON' has chosen to focus its policy on agile methods as being flexible and robust, they can respond quickly to challenges, events and opportunities.

More than ever before, it is the involvement of the staff that makes the difference: it is by respecting the good conduct that the company will continue to progress and evolve while ensuring AXON's sustainability and, above all, the well-being of all of us

IT IS NOT LONGER
THE "BIG" ATE
THE "SMALL" BUT
THE "FAST" EAT
THE "SLOW"





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