



# Our code of ethics and business conduct



**orano**

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Active in many countries, the Orano group operates in complex environments. In this context, the achievement of our ambition, in line with our corporate purpose “Develop know-how in the transformation and control of nuclear materials for the climate and for a healthy and resource-efficient world, now and tomorrow” and our commitment strategy, together with our long-term sustainability, are built upon common values which guide our actions and our behaviours at all levels and in all our activities:



Our Code of Ethics and Business Conduct sets out the principles and the rules that must be followed to respect these values on a day-to-day basis. It reflects our culture and expresses our commitments towards all our stakeholders, particularly in favour of sustainable development and respect for Human Rights. It serves as a reference for all employees and managers and showcases our expectations and our high standards to anyone wishing to partake in the success of our activities.

In this Code, accessible to all on our intranets and external websites, the group reiterates its commitment and principle of “zero tolerance” regarding corruption and fraud in all its forms.

As a responsible company committed to its stakeholders, our actions are governed by two principles considered as paramount, namely respecting:

- **the highest requirements relative to the nuclear and occupational safety challenges in our activities, as well as health and environmental protection,**
- **the strictest integrity standards, with an unwavering commitment to fighting corruption, fraud and anti-competitive practices.**

Dissemination of these values and adherence to our principles are the responsibility of all, managers and employees, across all entities of the group worldwide, together with all our industrial and business partners.

The Executive Committee, the Board of Directors and ourselves are counting on each and every one of you to strictly apply this Code of Ethics and Business Conduct so that, together, we can lay the foundations for sustainable and profitable growth while creating value for our customers and partners.




**Philippe Knoche**  
Chief Executive Officer

**Claude Imauven**  
Chairman of the Board of Directors

# 1 Our core values and principles

This Code defines the values of our group, in line with our corporate purpose “Develop know-how in the transformation and control of nuclear materials for the climate and for a healthy and resource-efficient world, now and tomorrow” and our commitment strategy. For each of us, it must be the benchmark for our behaviour and actions, in every region of the world where the group operates, and in all circumstances. All employees, both individually and collectively, must uphold this ethical commitment in their day-to-day work.

Within the Orano group, each one of us shares common values:

-  **Safety-security:** no compromises, we aim for the highest standards
-  **Customer satisfaction:** attentiveness, pragmatism, anticipation, responsiveness, proactiveness
-  **Continuous improvement:** delegating, the right to make mistakes, initiative, creativity, performance targets, outward-looking attitude, taking on challenges
-  **Respect and people development:** attentiveness, high standards, benevolence, respecting differences, professional and personal development
-  **Team spirit and cohesion:** cooperation, transparency, problem-solving, teamwork
-  **Ethics, transparency and dialogue:** information-sharing and dialogue with our internal and external stakeholders, respect for the law, company rules and employee rights, exemplarity, integrity.

Orano is a responsible group in terms of Ethics and Compliance. Our group operates in strict compliance with Human Rights, as defined in the UN-adopted Universal Declaration of Human Rights.

Orano defends the principles of the United Nations Global Compact and adheres to the OECD Guidelines for Multinational Enterprises and to the Extractive Industries Transparency Initiative (EITI).

We scrupulously comply with the laws and regulations of the countries in which we operate, along with our own internal rules. We are committed to respecting employee rights. The Orano group aims to apply the highest relevant standards in all situations.

Integrity, transparency and openness to dialogue are, together with nuclear and occupational safety, core values which govern our practices and decisions in all circumstances.

The group endeavours to supply reliable and accurate information enabling an objective assessment of its performance in its environmental, economic, social, and societal responsibilities.

The Code is applicable to all Orano employees, and to external and occasional service providers. It cannot be a substitute for the application of more stringent rules if an applicable legislation requires them.

For each of the topics addressed, examples are given to illustrate the behaviours to be adopted and those that are forbidden.

# 2 Governance of Ethics and Compliance

The application of Orano's Code of Ethics and Business Conduct (also called “Code of Ethics”) is everyone's responsibility. Managers are expected to adopt exemplary ethical behaviour.

Senior Management supervises the ethics and compliance programme and endeavours to disseminate the ethics culture within the group, with support from the Compliance Department and the other Departments in charge of the topics addressed in this Code.

Managers answer their teams' ethics and compliance questions or refer them to the Compliance correspondents of their Department or Unit. The Compliance Department is also at the disposal of all employees to answer their ethics-related questions.

A practical guide “Ethics & Compliance: How to act?”, which includes illustrations for each topic, is available to employees via the intranet and refers to the group procedures and policies.

The Orano group can also conduct audits, aimed at ensuring the proper application of this Code or the policies and procedures in force.

# 3 Our relations with our stakeholders

The commitments made by Orano towards its stakeholders are enshrined in our values and principles. The group also makes sure that its industrial and business partners, particularly its suppliers and subcontractors, adhere to them in return.

## The states where the group operates, their representatives, administrations and authorities

Orano scrupulously upholds the laws and rules in force in the states where it operates, including the instructions of the safety authorities.

## Our customers and partners

Our constant focus on customers satisfaction enables us to anticipate and meet their expectations. We endeavour to honour all our commitments to them by delivering high-quality products and services.

We respect their culture and protect their image and interests. The confidentiality of the data or know-how to which our customers and partners give us access is protected, within the legal and contractual framework, by Orano as if it was its own.

## Our workforce and its representatives

The workforce includes all the executives, managers, employees, trainees, and work-study students employed by an Orano group entity. Executives and managers in particular must show exemplary behaviour.

Recruitment of the Orano personnel is devoid of discrimination based on age, origin, gender, sexual orientation, ethnic background, nationality, religion, political opinions, physical appearance, or disability.

Orano respects the privacy of its employees and remains neutral towards their political opinions, trade union affiliations or philosophical or religious beliefs. In return, any indoctrination at the workplace is forbidden.

Orano is attached to cultivating sincere and loyal labour relations.

Orano offers its employees training plans aimed at maintaining their level of expertise in all areas required by their job and at contributing to their professional development.

All employees of the group undertake their activities in strict compliance with Human Rights, as defined in the UN-adopted Universal Declaration of Human Rights.

Employees commit to showing integrity in all circumstances and to comply with the laws and regulations in force in the countries where they operate, together with Orano's Code of Ethics and Business Conduct and the group policies and procedures. They manage Orano's resources with the same consciousness as their own. The same attitude is expected from temporary staff.

Employees commit to respecting the group's core values and principles and uphold the commitments taken by the group.

Customer satisfaction is a driver for the Orano workforce. Orano personnel displays a strong work ethic, competence, and rigor. The operations they perform or outsource fulfil the traceability obligations.

Our workforce cares about the excellence of Orano's products and services. Orano personnel ensures knowledge-sharing useful in our activities. The feedback received is systematically processed and integrated, in line with our principle of continuous improvement.

## Our shareholders and investors

Orano commits to upholding corporate governance principles, particularly to provide its shareholders and investors with optimum growth and return on their investment. We pay close attention to treating them equally and communicating accurate and correct financial information.

## Our suppliers and subcontractors

Orano intends to build, within the bounds of fair competition, sustainable partnerships with its suppliers and subcontractors in order to provide its customers with the best level of service.

We thus undertake to maintain loyal, fair, and objective relations governed by mutual respect with all our suppliers, subcontractors, and partners.

Orano protects the image of its suppliers and safeguard their confidential information as if it was its own.

Orano endeavors to ensure that its suppliers, subcontractors, financial partners, consultants and sales intermediaries (distributors, agents, etc.) uphold the principles described in this Code of Ethics and Business Conduct.

Orano undertakes to promote and abide by international human rights law and does not engage in any form of human trafficking, forced or compulsory labor or child labor, and requires its suppliers and subcontractors to make the same commitment.

Furthermore, Orano expects its suppliers to apply its security, health, safety and environmental protection standards, or at least equivalent standards.

Orano reserves the right to verify, at any time, that its suppliers' and subcontractors' practices are compliant with Orano's Code of Ethics and Business Conduct and along the supply chain.

## The general public and regions

Orano is proud of its long-term regional embeddedness and the valuable contribution made by its know-how to the development of the regions and society through the preservation of the climate, public health, and natural resources.

The group supports local communities through its programs for controlling risks and impacts on communities and the environment, aiming to reduce the environmental footprint of our activities and preserve biodiversity in the regions where the group is an industrial or mine operator. It also provides support by developing the economic fabric, competencies and employment within the regions.

Orano asserts its willingness for openness and participation in the public debate. We make sure to honestly explain our strategic and technological choices and to inform decision-makers and citizens about our activities and their possible impacts. In our operational activities, we emphasise dialogue with our stakeholders through formal committees and communication channels to better inform the public as well as be more attentive. In this context, we behave ethically in the use of information and communication media.

Orano intends to contribute to the development of the expertise and skills regarding the transformation and control of nuclear materials by supporting vocational training and youth employment.

Lastly, Orano asserts its contribution to global challenges facing future generations:

- The fight against climate change and energy insecurity by contributing to competitive, low-carbon electricity;
- The preservation of natural resources through the recycling of raw materials;
- Public health.

# 4 Our rules governing protection of persons, the environment and our assets

## Respect of persons and human rights

The group commits to conducting its activities in strict compliance with human dignity, forbidding in particular any harassment of any kind and any infringement of Human Rights, in order to eliminate child labor and any form of forced or compulsory labor, and to respect free association, private life and the right to collective bargaining.



### DO NOT:

- Adopt an inappropriate behaviour or say hurtful things to a colleague or any of Orano stakeholders
- Criticize a colleague because of their physical appearance, religion, beliefs, opinions or age



### DO:

- Show exemplarity and respect to your colleagues in all circumstances
- Ensure that human rights violations are prohibited across our supply chain

## Safety-security, environment, health & safety and protection

Orano makes sure that the activities exercised on its sites comply with the rules in force and group policies regarding safety, environmental protection, occupational health and safety and protection of people and installations.

Through their everyday behavior and actions, and wherever they operate, group employees are expected to:

- Take measures aimed at ensuring nuclear and occupational safety and protecting health and the environment, to the best of our knowledge, our ability, and our experience,
- Be exemplary in following HSE instructions (Health, Safety and Environment) and always maintain a questioning attitude about what we are preparing to do or what we are observing,
- Protect people and the environment from threats and malicious acts targeting our installations and nuclear materials, including as part of shipments,
- Report any concerns, risk to oneself / someone else, or any breach of HSE and protection rules.

The group undertakes to apply the golden rules and standards in full compliance with national and international regulatory requirements and contributes through its day-to-day behavior to maintaining the effectiveness of the preventive measures, keeping constant vigilance and immediately reporting abnormal situations.



### DO NOT:

- Ignore an HSE risk situation
- Neglect to find out about and receive training in the requirements



### DO:

- Rigorously apply the HSE guidance and always maintain a questioning attitude about what we are preparing to do or what we are observing
- Report any concerns, risk to oneself / someone else, or any breach of HSE rules.

## Quality

Orano offers high-quality products and services. On this basis, the group undertakes and seeks to meet all applicable legal, regulatory and contractual requirements, as well as international best practices, and to satisfy the expectations of its customers regarding the quality of its products and services.

The group resolutely fights irregularities and cases of quality fraud, whether these are committed internally or by suppliers and subcontractors.



### DO NOT:

- Yield to pressure to achieve results, potentially leading to irregularities
- Conceal or fail to report a quality deviation or fraud



### DO:

- Ensure that your behaviour is in line with the rules of conduct and the group's quality policies
- Be vigilant and report any deficiency

## Reputation and image

Orano's reputation is a key part of our asset.

Each employee must avoid doing or saying anything in public which may be considered as insulting, offensive or disrespectful to people or the group.

External and internal social media must be used with caution, including on a personal basis.

In national and international relations, respect for the host venue means that any disparagement or ostentatious, uncivil or informal behavior towards counterparts are forbidden.



### DO NOT:

- Publish, assert or act with the aim of damaging Orano's reputation and image (insults, discrimination, etc.)



### DO:

- Contact the group and/or local Communication Department if requests are received from journalists and/or other media

## Intangible assets

Employees shall protect the group's strategic and confidential information, whether or not marked "Orano Confidential" or "Restricted Distribution", against any intrusion, theft, loss, degradation, embezzlement, disclosure, copying, falsification, use for non-professional, illicit or non-transparent purposes, particularly on the internet, intranet and social media.

The aim is to protect technical data, business information and information contributing to the protection of people, material and immaterial goods and nuclear material.

This information includes but is not limited to: customer, prospect and supplier data files, passwords, documentation and drawings, methods and expertise, manufacturing secrets, intellectual and industrial property, forecasts, contracts and agreements, cost prices and sale prices, strategic or business plans, research and development or innovation-related information, financial and industrial information, names and details of specialists and experts and all collected and processed personal data.



### DO NOT:

- Leave your computer hardware unlocked or unattended.
- Answer external emails whose origin is unknown or suspicious



### DO:

- Assess and control the nature of the used information and report incidents
- Show common sense and rigor in order to protect the information

## Protecting personal data

Personal data protection covers all handling of information (softcopy or hardcopy) by a physical person. Orano safeguards the protection of personal data and has set up a compliance system in order to abide by the provisions applicable in countries where the group operates (including the European Union's General Data Protection Regulation and the amended law on IT and personal freedoms for France).



### DO NOT:

- Enable unauthorised people to access personal data
- Collect data too widely or use it for illicit purposes



### DO:

- Only collect relevant personal data for the envisioned purpose
- Declare all personal data processing to the Data Protection Officer, for analysis and entry in the DPO's record, before use

# 5 Our business conduct rules

Our business conduct rules aim to help employees identify potential risk situations and provide them with solutions so that their reaction fits the context. More detailed procedures are available on the intranet; the Compliance Department and the Compliance correspondents can provide insights or assistance if needed.

Integrity governs the relations of employees, executives and other representatives of the Orano group with the public authorities, customers, suppliers and partners within the framework of established or potential business relations.

## Corruption and influence peddling

The prevention of corruption and influence peddling is an important matter for the whole group. These rules are aimed at Orano personnel and executives worldwide, but also its industrial and business partners, so that we can act together to eradicate practices contrary to our values of integrity and exemplarity.

Orano rejects all forms of corruption, whether public or private, active or passive, anywhere in the world, and aims to apply a zero tolerance policy when proven acts of corruption or influence peddling are found.

Orano also prohibits any form of influence peddling with a public authority or government body, whether it is French, international or foreign, or with their officials.

- Orano forbids itself and others from making, offering, promising or soliciting, directly or indirectly, a payment or service, gift or leisure activity beyond a modest value, or any other undue advantage, to any politician, state or private-sector officials, or to illegally obtain or retain a contract or commercial advantage; such acts constitute an active corruption offence.
- Equally, Orano forbids itself and others from yielding to requests or making at any time, directly or indirectly, any offer, promise, donation, gift or reward or any other undue advantage to a person, on their behalf or on behalf of others, so that he/she can abuse their real or supposed influence to obtain from a public authority or administration any distinctions, jobs, contracts or any other favourable decision; such acts constitute an influence peddling offence.
- Lastly, Orano forbids itself and its employees and partners from accepting or requesting donations, gifts or advantages of any kind to unduly grant contracts, jobs or any other favourable decision; such acts constitute a passive corruption offence.

Employees must avoid any situation where they may find themselves, even temporarily, under an obligation to a third party, or any simply ambiguous situation.

Orano Compliance Department has developed a corruption and influence peddling prevention and detection program, accessible on the intranet and with which all must comply.



### DO NOT:

- Offer advantages or respond to requests aiming to facilitate obtaining or granting a contract
- Influence a public decision by offering undue advantages to a representative of a public authority



### DO:

- Apply the zero tolerance principle for proven acts of corruption and influence peddling
- Alert your line manager and the Compliance Department if a risky situation arises

## Money laundering

Orano prohibits all money laundering and terrorism financing, whether direct or indirect. Orano abides by the relevant regulations (particularly European Union directives 3, 4 and 5).

To this end, we carry out checks on our business partners according to the risk level and ensure traceability of financial flows.



### DO NOT:

- Conceal the origin of a received bank transfer or the beneficiary of a payment made



### DO:

- Ensure you know about your business partners and their ultimate beneficiaries and report any risky situation

## Facilitation payment

Facilitation payments are usually unofficial payments of small amounts, offered or requested by public officials or private sector employees, intended to facilitate or guarantee the smooth progress of simple procedures or necessary actions which the payer is entitled to expect (such as customs checks, the issuing of authorisations, visas, work permits, etc.).

Facilitation payments are forbidden in all the countries where the group operates, including those where local regulations do not prohibit them.

In many countries, including France, where facilitation payments are illegal irrespective of their frequency or amount, this practice is likened to corruption.

Orano considers small "gifts" of modest value (e.g.: cigarettes, alcohol, objects, etc.) as facilitation payments when they are offered in the same circumstances.



### DO NOT:

- Yield to an unwarranted request (except in the event of imminent risk to your physical integrity or safety)



### DO:

- Firmly refuse the request and inform your line manager and Compliance Correspondent forthwith in case of payment under duress

## Gifts and invitations

Orano recognises that the occasional acceptance or offering of gifts or invitations of modest value may sometimes legitimately contribute to good business relations.

Employees must demonstrate sound judgement and an acute sense of responsibility. Any doubts shall prompt the employee to refuse the gift or invitation offered or to first request authorisation from his/her manager or the Compliance Department. Gifts and invitations must be documented and recorded in the accounting records of the relevant entity.

In certain circumstances where an employee is in a position to accept or offer a gift or invitation of value (beyond a modest sum), for example because of local custom or protocol, the employee must inform their line manager, ask for prior written approval and record it in the register, in line with the applicable rules within the group.

Cash payments (or equivalent items like gift vouchers), personal favours, loans, invitations and gifts which are improper or take place in locations inappropriate for business relations are strictly forbidden, whether offered or received.

Events occasionally organised for customers must have a legitimate business purpose and be previously approved in all their terms and conditions at the appropriate level.



### DO NOT:

- Accept gifts or invitations likely to cast doubt on your integrity,
- Lack transparency towards your line manager



### DO:

- Politely refuse any gift or invitation likely to influence or be seen as likely to influence a business decision
- Alert your line manager or Compliance Correspondent if a delicate situation arises

## Conflicts of interest

Conflicts of interest are a central part of social life; each individual is potentially exposed to situations likely to interfere with the interests of the group (professional, family, political, associative, charity, trade union, religious, cultural, sporting, philosophical, etc.).

Orano pays close attention to these conflicts of interest. If they are not reported with full transparency and handled appropriately, they may have highly damaging consequences for the group's operations and reputation: fraud, corruption, defective compliance, skewed business negotiations, information leaks, internal check failures, favouritism, improper use of group resources, insider trading, etc.

Each individual may, in their professional duties, be exposed to situations where their personal interest or that of someone close to them may be likely to interfere with the interests of the Orano group.

Conflicts of interest brought to the attention of management are analysed on a case-by-case basis by the two higher management levels, who settle the conflict in accordance with applicable laws and regulations.



### DO NOT:

- Conceal a conflict of interest



### DO:

- Report suspected or proven conflicts of interest to your line manager in full transparency and without delay so they can be managed

## Competition law

Orano and its employees abstain from interfering, directly or indirectly, with the free play of competition within the framework of the group's activities, particularly in any business transactions or calls for tender in which they may participate. They abstain from participating in illicit arrangements or abusing the position of strength in which the group could find itself and, more broadly, any disloyal behaviour towards competitors or customers of the group.

Orano and its employees abide by the applicable competition rules of each of the countries in which the group operates.

Any information on third parties, particularly Orano's competitors, must only be collected and used in strict compliance with the applicable rules.



### DO NOT:

- Interfere with the free play of competition, particularly through understandings on prices or market sharing
- Exchange commercially sensitive information with a competitor



### DO:

- Always act with fairness and integrity in business relations
- Always cooperate with market regulatory authorities

## Export control and international sanctions

Orano strictly complies with applicable national, European and international provisions governing non-proliferation, IAEA (International Atomic Energy Agency) guarantees and export control, for any export or transfer of dual-use products, technologies, data and services (goods which may be used for a civilian or military purpose). It refrains from working under any other conditions.

The group commits to also abide by the applicable laws and regulations governing international sanctions and embargoes.



### DO NOT:

- Export dual-use goods without a licence
- Underestimate the extent of the international sanctions imposed by the states



### DO:

- Consult your Export Control Officer
- Ask yourself about the measures to be taken at each step of your project

## Relations with third parties

In order to safeguard the group's reputation, it is necessary to deal with business partners who respect our integrity rules and our values. Non-ethical behaviour from one of our partners could lead to violation of the applicable regulations and significantly harm our image.

"Partner" is understood to mean any party, company or individual with whom the group engages and has a business relationship (customers, suppliers and subcontractors, consultants, service providers, sales agents, intermediaries, lobbyists, JV partners, sponsorship beneficiaries, targets and counterparts in an acquisition or transfer project, etc.).

Depending on the risk level identified, third parties with which Orano has dealings undergo specific checks aiming to make sure of their integrity.

All group entities and employees must be able to vouch for the use of any sum of money in all circumstances (particularly the proof of service and a clearly identified beneficiary). No payment technique whose purpose or effect is to preserve the anonymity of a payer or beneficiary is allowed.

Regarding intermediaries, the group's rule is to have direct dealings with its partners; exceptions to this rule require in-depth analysis and review by the group's Compliance Committee.



**DO NOT:**

- Enter into a business relationship with a partner without carrying out compliance checks



**DO:**

- Analyse the compliance risks caused by third parties, in accordance with the group procedure
- Contact your Compliance Correspondent for any questions

**Representation of interests and political contributions**

The representation of interests towards the authorities, commonly called lobbying, is governed by laws and regulations specific to each State (including the Sapin II law in France) and international organisations. Orano abides by these rules, particularly the reporting obligations.

Any interest representation action aimed at directly or indirectly influencing a public decision in exchange for undue advantages is forbidden.

Regarding political contributions, no company in the group makes donations or supplies services to a political party, holder of political office or candidate for such office. However, for OECD member countries, in which such corporate donations are legal, contributions to the financing of electoral campaigns may be made in accordance with applicable State legislation. These donations will be subject to written permission from the corporate officer of the relevant subsidiary, who will make sure that they are kept at a minimum.



**DO NOT:**

- Omit to inform or consult the Public Affairs Department of the group or your entity when contact is made with a public official



**DO:**

- Refuse any request for compensation within the scope of lobbying activities

**Sponsorship, donations, charitable activities**

The strategy for partnership-building (donations, sponsorships and charitable activities), and its action plan, are defined at Orano group level.

Our operations are enshrined in our Values. They are characterised by the absence of administrative or commercial compensation.

We only operate in a partner capacity, without project management or operator responsibility, and only make a contribution to projects or actions which are run by the initiators, after accomplishing all the required legal and administrative formalities and obtaining all the required permits and guarantees.

Our contribution as part of corporate sponsorship excludes any donation to State or regional administration or to physical persons, and any cash payment.



**DO NOT:**

- Sponsor associations or events outside the actions targeted by group policy



**DO:**

- Get Communication Department approval, within the group partnership policy, to support an association or initiative, after third-party compliance analysis, and formalize the relationship between Orano and the beneficiary

**Insider trading**

Management and personnel are aware of professional confidentiality and informed of their duty of discretion towards those close to them. They are warned of the insider trading which may arise from the above and must abide by the current group procedure when handling privileged information.

The executives and the company insider undertake, in compliance with the law, to only acquire or transfer, directly or indirectly, securities included in the negotiations and issued by the group, including Orano shares or debt securities issued by Orano, listed or non-listed subsidiaries' securities, according to a privileged information management procedure set by the group, and commit to immediately inform the company's supervisory bodies thereof.

Employees must not use items of privileged information to which they may have access as part of their professional activity to acquire or transfer securities issued by partners, suppliers, customers or other counterparts.



**DO NOT:**

- Disclose or use privileged information potentially leading to illicit earnings



**DO:**

- Show vigilance and discretion towards sensitive and confidential information, particularly before the publication of the results

**Fraud**

Orano endeavours to prevent any form of fraud, since it may significantly impact its reputation or results.

Fraud consists in deliberately deceiving someone in order to receive illegitimate advantages and circumvent legal obligations or the organisation's rules. The motivation to commit fraud can be material (appropriation of assets, earning money, etc.) or moral (wanting to be recognised or to preserve one's reputation, etc.). In practice, it can be carried out by commission or by omission. It can stem from inside or from outside the organisation.

To deal with these risks, the group is committed to fighting fraud with clear rules and targeted communication and is supported in particular by the group's internal control framework.



**DO NOT:**

- Issue a payment without checking the supporting documents and the required approval levels
- Neglect the checks to urgently process an operation



**DO:**

- Question suspicious or unusual requests
- Ask for assistance in case of doubt



# 6 Whistleblowing system

As part of its ethical commitment, Orano has implemented a system for collecting and processing reports (whistleblowing system).

If blatant negligence or disregard for a legal or regulatory obligation or a breach of this Code of Ethics or of compliance policies occurs, immediate reporting shall be a reflex and a duty. There is no barrier to the internal flow of information, or rank required for anyone to immediately warn their management. If an employee has an ethical query or concern, they must talk to their direct or indirect line manager, or with any manager, or contact the Compliance Correspondent of their Department or Unit, or else the group Chief Compliance Officer.

If a person (group employee or supplier, service provider, partner or customer) personally learns facts contrary to Orano's Code of Ethics and Business Conduct, they may file a report either through a manager or via the dedicated whistleblowing portal (address available on the group's intranet and external website). After analysis of the report's admissibility, further checks will be made to clarify the allegations so that any remedial measures can be identified.

In accordance with the law, Orano guarantees the confidentiality of the whistleblower's identity as well as the absence of retaliation for having reported facts in line with the procedure, as long as the report is made selflessly and in good faith.

# 7 Disciplinary sanctions

A violation of Orano's Code of Ethics and Business Conduct or of the policies and procedures in force exposes the employee to disciplinary sanctions (which will depend on the breach and may range from warnings to dismissal for misconduct, in accordance with the internal regulations applicable to each group entity), or even legal penalties. The locally applied disciplinary sanctions must comply with applicable labor regulations.

Lined area for notes, consisting of multiple horizontal lines for writing.



As a recognized international operator in the field of nuclear materials,  
Orano delivers solutions to address present and future global energy and health challenges.

Its expertise and mastery of cutting-edge technologies  
enable Orano to offer its customers  
high value-added products and services throughout the entire fuel cycle.

Every day, the Orano group's 16,500 employees draw on their skills,  
unwavering dedication to safety and constant quest for innovation,  
with the commitment to develop know-how in the transformation and control of nuclear materials,  
for the climate and for a healthy and resource-efficient world,  
now and tomorrow.

Orano, giving nuclear energy its full value.



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