

Code of Conduct

of

ISD SA



ISD SA

“CODE OF CONDUCT”

This document was written in 2026 and approved by the leadership team. It reflects our current values, expectations, and standards as of February 2026.

It applies to all employees, contractors, and representatives of ISD SA.

Table of Contents

SECTION 1 – INTRODUCTION, PURPOSE & SCOPE.....	5
1.1 MESSAGE FROM MANAGEMENT.....	5
1.2 PURPOSE OF THE CODE OF CONDUCT	5
1.3 WHO THIS CODE OF CONDUCT APPLIES TO	5
1.4 OUR INDIVIDUAL RESPONSIBILITIES	6
1.5 SPEAK UP AND NON-RETALIATION	6
SECTION 2 – OUR VALUES & WAY OF WORKING	7
2.1 INTEGRITY	7
2.2 SAFETY AND QUALITY MINDSET.....	7
2.3 PROFESSIONALISM AND ACCOUNTABILITY	8
2.4 RESPECT AND COLLABORATION.....	8
2.5 SPEAKING UP AND ASKING FOR HELP	8
SECTION 3 – OUR PEOPLE	9
3.1 RESPECTFUL AND PROFESSIONAL WORKPLACE.....	9
3.2 HEALTH, SAFETY, AND WELL-BEING	9
3.3 INCLUSION AND EQUAL OPPORTUNITY	10
3.4 HUMAN RIGHTS AND FAIR WORKING CONDITIONS	10
3.5 LABOUR RELATIONS	11
3.6 COMMUNITY AND SOCIAL RESPONSIBILITY.....	11
SECTION 4 – BUSINESS INTEGRITY	12
4.1 ACTING WITH INTEGRITY IN ALL BUSINESS DEALINGS	12
4.2 ANTI-BRIBERY AND CORRUPTION.....	12
4.3 WORKING WITH THIRD PARTIES	13
4.4 CONFLICTS OF INTEREST	13
4.5 FAIR COMPETITION	14
4.6 INSIDER INFORMATION AND CONFIDENTIALITY.....	14
SECTION 5 – EXPORT CONTROL AND SECURITY	15
5.1 OUR COMMITMENT TO EXPORT CONTROL COMPLIANCE	15
5.2 WHAT IS CONTROLLED	15
5.3 INDIVIDUAL RESPONSIBILITIES	16

5.4 SECURITY OF INFORMATION AND ASSETS 16

5.5 WHEN IN DOUBT – STOP AND ASK 16

SECTION 6 – OUR PRODUCTS, INTELLECTUAL PROPERTY, AND DATA..... 17

6.1 PRODUCT SAFETY AND QUALITY 17

6.2 ENGINEERING INTEGRITY AND PROFESSIONAL RESPONSIBILITY 17

6.3 PROTECTION OF INTELLECTUAL PROPERTY AND KNOW-HOW 18

6.4 DATA PRIVACY AND CYBERSECURITY 18

6.5 MAINTAINING ACCURATE RECORDS AND TRACEABILITY 19

SECTION 7 – ENVIRONMENT, COMMUNICATION, AND ENFORCEMENT 20

7.1 ENVIRONMENTAL RESPONSIBILITY 20

7.2 MANAGING COMMUNICATIONS 20

7.3 COMPLIANCE WITH THE CODE AND CONSEQUENCES OF VIOLATIONS 21

7.4 RAISING CONCERNS AND SEEKING GUIDANCE 21

7.5 ACKNOWLEDGEMENT OF THE CODE OF CONDUCT 22

Section 1 – Introduction, Purpose & Scope

1.1 Message from Management

At ISD SA, integrity, safety, and technical excellence are fundamental to how we work. As an aerospace R&D organization developing hardware, embedded software, PCBs, harnesses and prototype assemblies, our actions directly impact product safety, customer trust, and regulatory compliance.

This Code of Conduct sets out the principles and expectations that guide our decisions and behaviour. It reflects our commitment to act ethically, comply with applicable laws and regulations, and maintain the highest professional standards in everything we do.

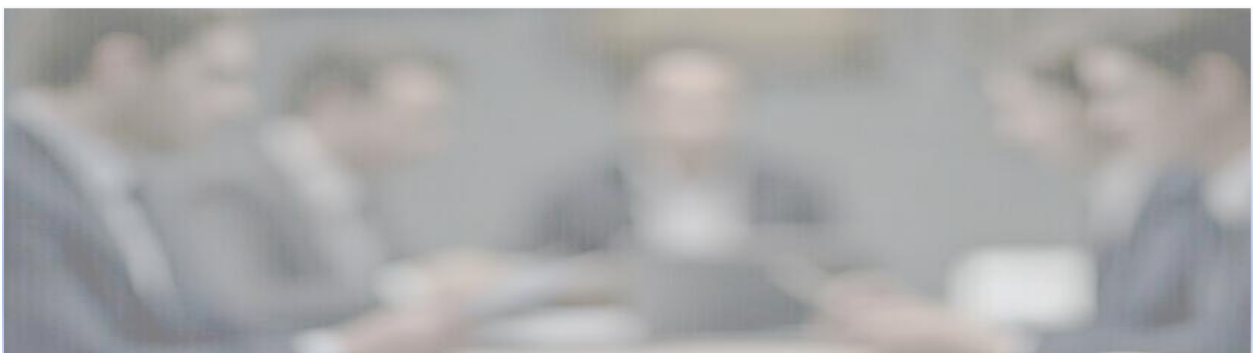
Each of us is responsible for understanding and following this Code. When in doubt, we are expected to ask questions and seek guidance.

1.2 Purpose of the Code of Conduct

The purpose of this Code of Conduct is to:

- Define clear expectations for ethical and professional behaviour
- Support compliance with laws, regulations, and customer requirements
- Protect our people, our customers, and our company
- Promote a culture of transparency, accountability, and trust
- Provide guidance when facing difficult or unclear situations

This Code does not replace detailed procedures or policies but works alongside them as a common behavioural framework.



1.3 Who This Code of Conduct Applies To

This Code of Conduct applies to:

- All employees of ISD, regardless of role or seniority

- Managers, executives, and members of management
- Temporary staff, interns, and trainees
- Contractors, consultants, and third parties acting on behalf of the company, where applicable

All individuals covered by this Code are expected to comply with its principles as a condition of working with or for ISD.

1.4 Our Individual Responsibilities

Every person covered by this Code is expected to:

- Act with integrity and professionalism at all times
- Comply with applicable laws, regulations, and internal requirements
- Protect company assets, intellectual property, and confidential information
- Speak up if something appears unsafe, unethical, or non-compliant
- Seek guidance when unsure how to act

Managers have an additional responsibility to:

- Lead by example
- Promote understanding of this Code
- Create an environment where people feel safe to raise concerns

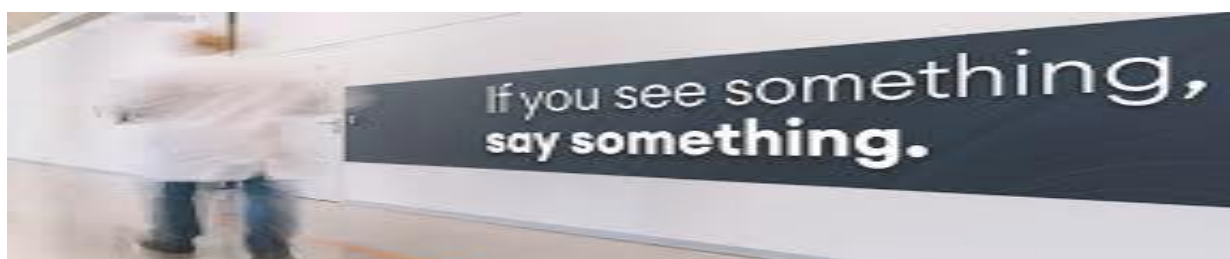
1.5 Speak Up and Non-Retaliation

We encourage open communication and the reporting of concerns. Speaking up helps prevent harm and protects our people, our customers, and our company.

Employees are encouraged to raise questions or concerns:

- With their manager
- With management
- Through any designated reporting channel

Retaliation against anyone who raises a concern in good faith is strictly prohibited, even if the concern turns out to be unfounded.



Section 2 – Our Values & Way of Working

2.1 Integrity

We act honestly, ethically, and transparently in all our activities. We do not compromise our values to achieve results, meet deadlines, or win business.

Integrity means:

- Doing the right thing, even when no one is watching
- Being truthful in our communications and records
- Refusing unethical or illegal practices



2.2 Safety and Quality Mindset

Safety and quality are fundamental to aerospace activities and to our work as an R&D organization.

We are committed to:

- Designing, developing, and testing products responsibly
- Following approved processes and technical standards
- Stopping work and raising concerns when safety or quality may be compromised

Shortcuts, concealment of errors, or deviation from approved requirements are unacceptable.



2.3 Professionalism and Accountability

Each of us is accountable for our actions and decisions.

We are expected to:

- Perform our duties competently and responsibly
- Take ownership of our work and its outcomes
- Acknowledge mistakes and correct them promptly

Accountability strengthens trust within our teams and with our customers.

2.4 Respect and Collaboration

We treat everyone with dignity and respect.

This includes:

- Open and constructive communication
- Valuing different perspectives and expertise
- Working collaboratively across functions and disciplines

Disrespectful, abusive, or discriminatory behaviour is not tolerated.



2.5 Speaking Up and Asking for Help

In an engineering and R&D environment, uncertainty and complexity are normal.

We expect everyone to:

- Ask questions when unsure
- Raise concerns early
- Share lessons learned and improvement ideas

Speaking up is a responsibility, not a risk.

Section 3 – Our People

3.1 Respectful and Professional Workplace

We are committed to maintaining a work environment based on mutual respect, trust, and professionalism.

We expect everyone to:

- Treat colleagues, partners, and visitors with dignity and respect
- Communicate professionally, even in stressful or high-pressure situations
- Avoid behaviour that could be perceived as intimidating, offensive, or inappropriate

Harassment, bullying, discrimination, or any form of abusive behaviour will not be tolerated.

3.2 Health, Safety, and Well-Being

The health and safety of our people is a top priority.

- We are committed to:
- Providing a safe and healthy working environment
 - Complying with applicable health and safety laws and regulations
 - Identifying, assessing, and mitigating workplace risks

- All employees are expected to:
- Follow safety rules, procedures, and instructions
 - Use equipment, tools, and protective measures correctly
 - Immediately report unsafe conditions, incidents, or near misses

No task is so urgent that it justifies compromising safety.



3.3 Inclusion and Equal Opportunity

We value diversity and believe that inclusive teams strengthen innovation and performance.

We provide equal opportunities in:

- Recruitment and employment
- Training and professional development
- Performance evaluation and career progression

Employment-related decisions are based on qualifications, performance, and business needs. Discrimination based on personal characteristics is not acceptable.



3.4 Human Rights and Fair Working Conditions

We respect internationally recognized human rights and expect the same from those we work with.

This includes:

- Prohibiting forced labour, child labour, or any form of exploitation
- Respecting freedom of association and lawful collective representation
- Providing fair wages and working hours in accordance with applicable laws

We do not knowingly engage with partners or suppliers that violate fundamental human rights.

3.5 Labour Relations

We aim to maintain open, honest, and constructive relations with our employees.

We are committed to:

- Clear communication regarding employment terms and conditions
- Fair and lawful employment practices
- Addressing concerns in a timely and respectful manner

Employees are encouraged to raise workplace-related questions or concerns without fear of retaliation.



3.6 Community and Social Responsibility

We recognize that our activities affect the communities in which we operate.

We strive to:

- Act responsibly and ethically in our local communities
- Minimize negative impacts from our operations
- Support initiatives that contribute positively to society, where feasible

Section 4 – Business Integrity

4.1 Acting with Integrity in All Business Dealings

We conduct our business honestly, ethically, and in compliance with applicable laws and regulations.

We do not tolerate unethical behaviour, even if it could appear to benefit the company. Business results must never be achieved through improper, dishonest, or illegal means.

4.2 Anti-Bribery and Corruption

Bribery and corruption are strictly prohibited.

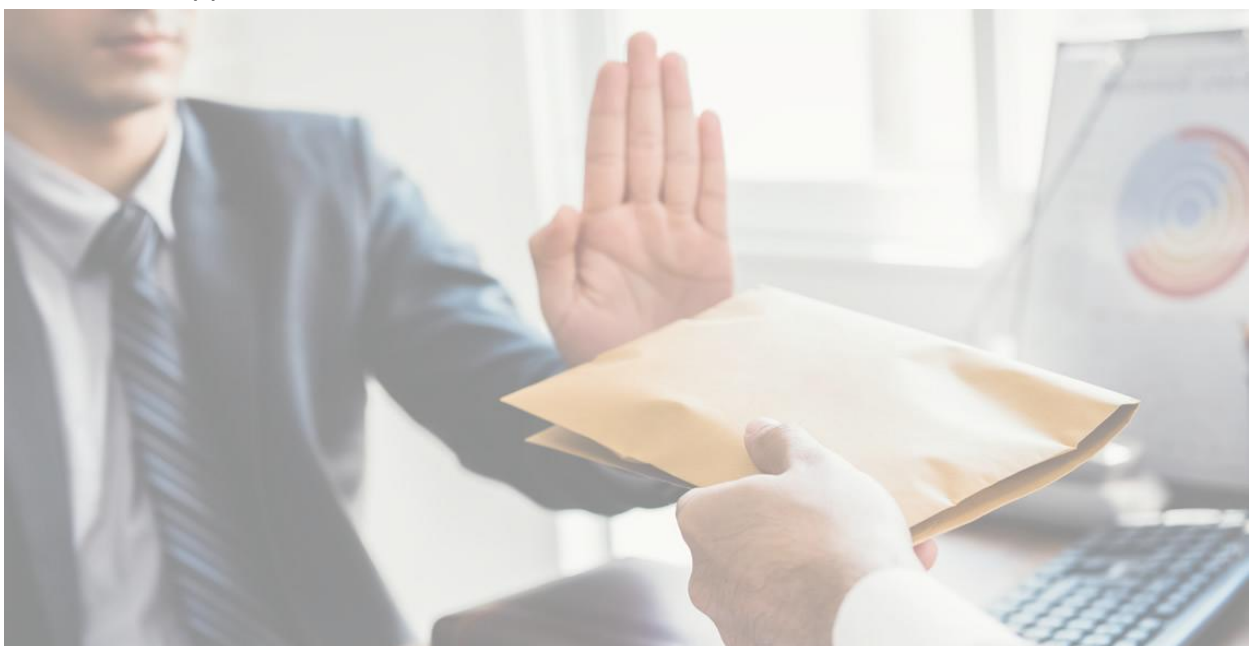
No employee or representative of ISD may:

- Offer, promise, give, request, or accept bribes, kickbacks, or improper advantages
- Make facilitation payments or unofficial payments to influence decisions
- Use third parties to perform actions that would be prohibited if done directly

This applies to interactions with:

- Customers
- Suppliers
- Public officials
- Certification bodies and auditors

Gifts and hospitality must be reasonable, infrequent, and appropriate, and must never influence or appear to influence business decisions.



4.3 Working with Third Parties

Third parties can expose the company to significant risk.

We expect suppliers, subcontractors, consultants, and agents to:

- Act ethically and lawfully
- Comply with applicable laws and contractual obligations
- Respect our values and this Code where relevant

Employees must:

- Select third parties based on objective and transparent criteria
- Avoid engaging third parties for improper purposes
- Raise concerns if a third party behaves unethically or illegally

4.4 Conflicts of Interest

A conflict of interest occurs when personal interests interfere, or appear to interfere, with professional responsibilities.

Employees must:

- Avoid situations where personal interest conflicts with company interests
- Disclose any actual or potential conflicts of interest
- Refrain from participating in decisions where a conflict exists

Examples include:

- Financial interests in suppliers or customers
- Outside employment that affects objectivity or performance
- Personal relationships that influence business decisions



4.5 Fair Competition

We compete fairly and ethically.

We do not:

- Engage in price fixing or market sharing
- Exchange confidential or competitive information improperly
- Use deceptive or misleading practices

All competitive information must be obtained lawfully and ethically.

4.6 Insider Information and Confidentiality

Non-public information must be handled responsibly.

Employees must:

- Protect confidential and proprietary information
- Use company information only for legitimate business purposes
- Never misuse inside information for personal or third-party benefit

Confidentiality obligations continue after employment ends.



Section 5 – Export Control and Security

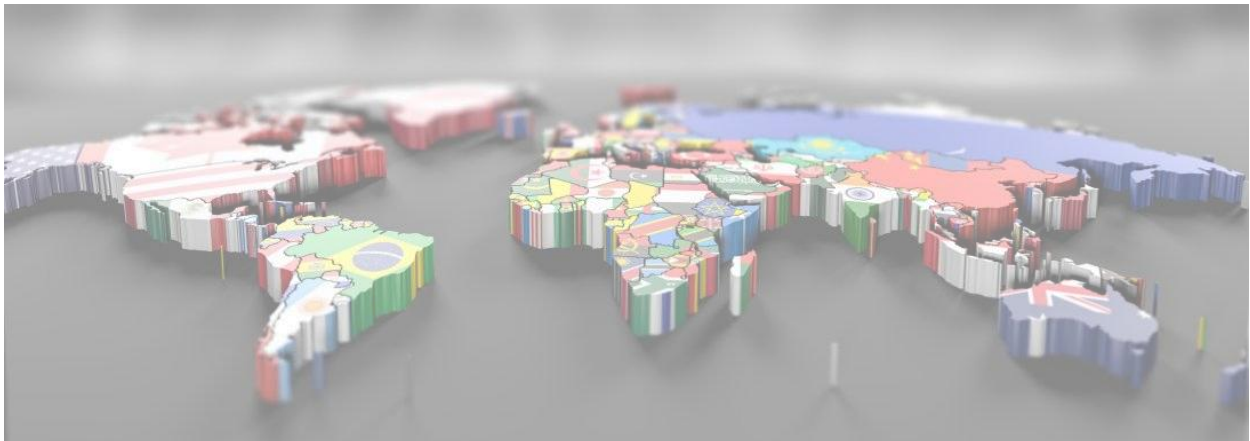
5.1 Our Commitment to Export Control Compliance

As an aerospace R&D company working with hardware, embedded software, technical data, and prototypes, export control compliance is critical.

We are committed to complying with:

- Applicable export control and trade compliance laws
- Sanctions and embargo regulations
- Customer and contractual export control requirements

Export control obligations apply regardless of whether a transfer is physical, electronic, verbal, or visual.



5.2 What Is Controlled

Export control requirements may apply to:

- Hardware, equipment, and prototype assemblies
- Embedded software and firmware
- Technical data, drawings, specifications, and source code
- Emails, file sharing, remote access, and cloud storage
- Discussions and presentations with non-authorized persons

Export controls can apply within the same country if information is accessed by non-authorized nationals.

5.3 Individual Responsibilities

Every employee is responsible for:

- Being aware that export controls may apply to their work
- Protecting controlled information from unauthorized access
- Not transferring controlled items or data without proper authorization
- Raising questions when unsure whether export controls apply

Managers are responsible for ensuring that export control requirements are understood and followed within their teams.

5.4 Security of Information and Assets

We are committed to protecting sensitive and controlled information.

This includes:

- Following information security and access control rules
- Using company-approved systems and tools
- Protecting physical and digital assets from loss, theft, or misuse

Security incidents, data leaks, or suspected unauthorized access must be reported immediately.



5.5 When in Doubt – Stop and Ask

Export control violations can have serious legal and business consequences.

If there is any doubt about:

- Whether an item, software, or data is controlled
- Whether a transfer is permitted
- Whether a person is authorized

Stop the activity and ask for guidance.

Section 6 – Our Products, Intellectual Property, and Data

6.1 Product Safety and Quality

Product safety and quality are fundamental to our work and to the aerospace industry.

We are committed to:

- Designing, developing, and testing products responsibly
- Complying with applicable technical, safety, and quality requirements
- Ensuring that products and prototypes meet defined specifications and acceptance criteria

All employees must:

- Follow approved processes and instructions
- Report errors, deviations, or non-conformities promptly
- Never conceal mistakes or falsify results

Safety and quality concerns must always be addressed, even if this impacts schedules or costs.



6.2 Engineering Integrity and Professional Responsibility

As an R&D organization, our credibility depends on technical integrity.

We expect engineers and technical staff to:

- Apply sound engineering judgment
- Base decisions on facts, data, and validated assumptions
- Document work accurately and transparently

Unauthorized changes, undocumented modifications, or bypassing required reviews or approvals are not acceptable.

6.3 Protection of Intellectual Property and Know-How

Our intellectual property and technical know-how are among our most valuable assets.

Employees must:

- Protect confidential and proprietary information
- Share information strictly on a need-to-know basis
- Use company intellectual property only for legitimate business purposes

This includes:

- Designs, drawings, schematics, and layouts
- Source code, firmware, and algorithms
- Test data, reports, and methodologies

Intellectual property belonging to customers, partners, or third parties must be respected and protected with equal care.

6.4 Data Privacy and Cybersecurity

We are committed to protecting personal data and company information.

This includes:

- Complying with applicable data protection and privacy laws
- Using company-approved IT systems and tools
- Protecting passwords, credentials, and access rights

Employees must not:

- Share sensitive data without authorization
- Use unapproved storage devices or cloud services
- Circumvent security controls

Any suspected data breach, cyber incident, or loss of information must be reported immediately.



6.5 Maintaining Accurate Records and Traceability

Accurate records are essential for quality, safety, and compliance.

We expect all records to be:

- Complete, accurate, and truthful
- Created and maintained in a timely manner
- Stored and retained in accordance with applicable requirements

Records include:

- Design and development documentation
- Test and inspection results
- Configuration and change records
- Time, expense, and financial records

Falsification, manipulation, or improper destruction of records is strictly prohibited.



Section 7 – Environment, Communication, and Enforcement

7.1 Environmental Responsibility

We are committed to conducting our activities in an environmentally responsible manner.

We strive to:

- Comply with applicable environmental laws and regulations
- Minimize waste and environmental impact from our operations
- Use materials, chemicals, and resources responsibly
- Manage prototypes, electronic waste, and hazardous materials appropriately

Environmental concerns or incidents must be reported promptly so that corrective action can be taken.



7.2 Managing Communications

Clear and responsible communication is essential to maintaining trust and protecting the company.

Only authorized persons may:

- Communicate externally on behalf of the company
- Respond to media, public, or regulatory inquiries
- Make public statements related to company activities

Employees must:

- Ensure that information shared externally is accurate and appropriate
- Protect confidential, proprietary, and controlled information
- Use social media responsibly and avoid disclosing company-related information without authorization

7.3 Compliance with the Code and Consequences of Violations

Compliance with this Code of Conduct is a condition of working for or on behalf of ISD.

Violations of this Code may result in:

- Corrective actions
- Disciplinary measures, up to and including termination of employment or contracts
- Legal action, where applicable

Disciplinary actions will be applied fairly and proportionately, in accordance with applicable laws.



7.4 Raising Concerns and Seeking Guidance

We encourage everyone to raise questions or concerns related to this Code.

Concerns may be raised:

- Through line management
- Through management or designated contacts
- Through all available reporting mechanisms

Raising concerns in good faith will not result in retaliation.

7.5 Acknowledgement of the Code of Conduct

All individuals covered by this Code are expected to:

- Read and understand the Code of Conduct
- Comply with its principles
- Seek guidance when unsure how to act

The Code of Conduct may be updated periodically to reflect changes in laws, regulations, or company activities.



ISD SA is a dynamic organization
committed to innovation, quality, and
positive impact.

Rooted in integrity and teamwork, we
provide outstanding solutions while
nurturing an inclusive, supportive
culture.

By following this Code of Conduct, we
build lasting trust and drive shared
success.

Thank you for contributing to our mission.

REPRESENT THE ORGANIZATION POSITIVELY

PRIORITIZE SAFETY AND SUSTAINABILITY

PROMOTE INCLUSION AND DIVERSITY

REPORT WRONGDOING PROMPTLY

TREAT EVERYONE WITH DIGNITY

SUPPORT WORK-LIFE BALANCE

MEET COMMITMENTS RELIABLY

ACT WITH INTEGRITY

RESPECT OTHERS



DO WHAT'S RIGHT

PERFORM WITH EXCELLENCE

DELIVER HIGH-QUALITY WORK

USE RESOURCES RESPONSIBLY

AVOID CONFLICTS OF INTEREST

FOLLOW ALL LAWS AND POLICIES

PURSUE CONTINUOUS IMPROVEMENT

PROTECT CONFIDENTIAL INFORMATION

LISTEN ACTIVELY AND COMMUNICATE RESPECTFULLY

