

ETHICS AND YOU



SELEX GALILEO

A Finmeccanica Company

FOREWORD

“SELEX Galileo forms a significant part of the defence electronics business within the Finmeccanica Group.

SELEX Galileo shares the objectives and policies of its parent company. In adopting the Code of Ethics of Finmeccanica, SELEX Galileo accepts the principles of fairness and transparency with regard to the organisation and conduct of its business exemplified in the Code.

SELEX Galileo is committed to ethical business practices and expects its employees, plus anyone working on its behalf, in approaching all business dealings to demonstrate this commitment. We must act in accordance with applicable laws and regulations but it is essential for the well-being of SELEX Galileo to adopt practices that not only adhere to these laws and regulations but to be seen in the wider community to conduct our business in accordance with the highest standards, and in doing so, maintain and protect our excellent reputation.

SELEX Galileo employs 7,000 personnel with operations in the United Kingdom, Italy and the United States. We must conform to the ethical standards we have set ourselves wherever we operate.

Unethical behaviour will not be tolerated at any level. Practices that might involve bribery or corruption are not and will not be accepted by SELEX Galileo. The consequences of corrupt behaviour are serious; it may not only result in the loss of the business affected, but also the criminal prosecution of those involved, and areas of the business potentially being barred from taking part in future opportunities.



I must stress that I, and the senior management of SELEX Galileo, are personally committed to act with integrity in everything we do. We will ensure that we are – and are seen to be – in all business we conduct, acting properly and lawfully.

Please take the necessary time to familiarise yourselves with this brochure, read and understand the Code of Ethics and always ensure that we are complying with the standards that we have set ourselves.”

Steve Mogford, CEO SELEX Galileo

WHAT DOES ETHICAL BUSINESS CONDUCT MEAN TO SELEX GALILEO?

SELEX Galileo demands that its business is conducted following the principles of:

- compliance with the applicable law
- transparency and proper management
- trust and cooperation with stakeholders

in order to compete effectively and fairly in the market, to improve customer satisfaction, give added value to its shareholders and develop the capabilities and promote the professional growth of its human resources.

The following provide some examples of what ethical behaviour means when working for SELEX Galileo:

COMPLY	Comply with the laws and regulations.
APPLY	Apply the standards as widely as possible in all business dealings.
PROHIBIT	Prohibit corruptive practices.
REGULATE	Regulate the provision of gifts and hospitality and the making of political donations and contributions.
RECORD	Record the provision of gifts and hospitality and the making of political donations and contributions.
APPOINT	Appoint and conduct relationships with third parties acting as consultants or intermediaries in accordance with defined good practices.
IMPLEMENT	Implement ethical standards by putting in place appropriate integrity programmes.
DETERMINE	Determine and apply appropriate sanctions in the event of non-compliance with ethical standards.

WHAT IS EXPECTED OF ME?

SELEX Galileo policies convey the message that we will obey the law and behave ethically at all times, and it is essential that each individual employee is aware of this and adheres to the principles that we have set ourselves.

SELEX Galileo will be judged on how each individual behaves, so remember, we must all:

- Apply the principles in our dealings
- Discourage others from unethical conduct
- Report any unethical behaviour we see.

WHAT IS UNETHICAL BEHAVIOUR?

All activities undertaken by the employees on behalf of the Company must be performed with professional care and moral rigour; their proper management shall also safeguard the image of the Company.

The conduct and relationships of all employees both internally and externally to the Company must be based on transparency, fairness and mutual respect.

The following are examples of unethical behaviour and should therefore be avoided as a standard practice by all SELEX Galileo employees.

- Outside interest that could influence, or appear to influence, your judgement at work, such as taking a second job without authorisation
- Misuse of your position for individual benefit such as obtaining personal benefits from customers or suppliers
- Acting fraudulently such as falsely recording time, expenses and other costs chargeable to the Company or to customers, or misusing company resources or facilities
- Harassing, bullying or abusing anyone, either by actions or language and non-compliance with the laws and principles of equal opportunities
- Disrespecting /disclosing the confidentiality of personal data and proprietary information the Company holds
- Engaging in criminal activities that impacts work or encouraging work colleagues to become involved in criminal activities
- Giving or accepting gifts with corrupt intent, or making payment to others with corrupt purpose.

As a general rule, any action that is unlawful, dishonest or harmful to others or which is against our policies is unacceptable and is liable to disciplinary action. In serious cases, external authorities may become involved.

HOW DO I FIND OUT MORE ABOUT ETHICS?

SELEX GALILEO POLICY AND PROCEDURE

Whilst the SELEX Galileo Operational Framework includes the ethical principles that we seek to follow, these are supported by a number of SELEX Galileo policies in place which address the ethical matters.

These are available via the Business Management System (BMS) or through the homepage on the intranet.

Remember that reading this leaflet does not exempt you from reading and understanding the Code of Ethics, which can be found through the homepage on the intranet.

WHO CAN I REPORT MY ETHICAL CONCERNS TO?



LINE MANAGER

Whether you have an UK or Italian line manager, when looking for advice on ethical conduct or reporting concerns, your line manager or supervisor should be used as a first point of contact to advise who else can assist with clarifying your concern or how to formally report a concern.

ALTERNATIVES

If you do not feel comfortable or able to discuss ethical issues with your line manager, there are alternatives available to you. There are within SELEX Galileo UK the following examples of people who have specialist knowledge and can help you if required:

- **Personal and Employment issues** - Your HR Department
- **Legal Issues** - Your Legal & Company Affairs Department
- **Diversity or Equal Opportunities** - Your HR Department
- **Bribery or other Corrupt Practices** - The Company Compliance Officer or the Head of Internal Audit UK
- **Safety, Health and Environment (SHE) issues** - Your site SHE representative, SHE board representative or Local Operations Manager

Financial and SHE issues are very important to SELEX Galileo as they have the potential to cause great harm to others and ourselves. Enforcement agencies can and will prosecute our companies, and in some cases individual employees, over many sorts of regulatory breaches. We want to be aware of something before it gets to this stage so that we are given the chance to rectify it. In an ideal world, SELEX Galileo would like to stop these problems occurring at all and with your help in reporting any concerns in these areas we can achieve our aim.

cont.

WHO CAN I REPORT MY ETHICAL CONCERNS TO?



If you believe you have seen unethical behaviour you must do something about it. Start by telling your manager or talk to one of the other sources of advice listed on the previous page. Alternatively you can use the option below. Don't keep your concern to yourself even if you are unsure if it relates to unethical behaviour.

SELEX GALILEO LTD THE ETHICS HOTLINE

The Ethics Hotline is available to all SELEX Galileo Ltd personnel and can be contacted via the following phone number:

UK - FREEPHONE - 0800 374199

If you have concerns but don't want to talk to your manager or to colleagues, you can call the Ethics Hotline. This is a 24 hour a day, seven day a week confidential telephone service. It is provided by Expolink, a specialist company in this field, so it is totally independent of the Company. You should call the hotline if:

- you want to report situations where the law or our policy may have been broken
- you think issues you have reported are not being tackled properly.

For further information regarding the Ethics Hotline please visit the Ethics Intranet pages.

WHO CAN I REPORT MY ETHICAL CONCERNS TO?



LINE MANAGER

When looking for advice on ethical conduct, your line manager or supervisor should be the first point of contact. The employees may at any time seek guidance and clarifications from them on the contents of the Code of Ethics and the protocols and on the tasks that they have been assigned to perform.

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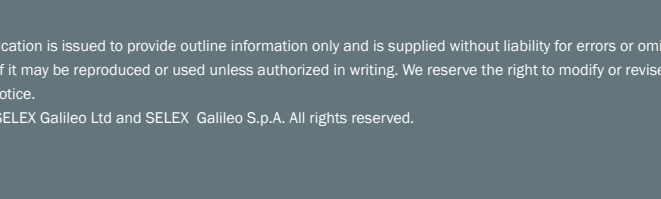
In Italy, the Surveillance Body is granted autonomous power of initiative and control, as relevant for the purposes of Legislative Decree n.231 dated June 8, 2001 and is entrusted by the SELEX Galileo S.p.A Board of Directors with the task of overseeing the operation and compliance with the organisational model.

In order to facilitate the flow of information and submissions towards the Surveillance Body, SELEX Galileo S.p.A has established a dedicated information channel (e-mail: organismo.vigilanza@selexgalileo.com) through which anybody becoming aware of any illicit behaviours may freely, directly and on a confidential basis, report it to the Surveillance Body. As a consequence of the said report, the necessary checks shall be promptly arranged and adequate disciplinary measures taken.

When a committed, attempted or requested breach of the rules of the Code of Ethics and the relevant protocols is reported, SELEX Galileo S.p.A shall ensure that no one, in the workplace, may be subject to any retaliation, illegal conditioning, hardship and discriminating treatment of any kind, for having reported a breach of the Code of Ethics or of the procedures foreseen by the internal protocols to the Surveillance Body.

To view the Code of Ethics please refer to the link below:

http://www.selexgalileo.com/EN/Common/files/Galileo_Avionica/Altri_doc/CE-GA-ingl-finalxdiff.pdf



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