

CODE OF CONDUCT



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A man with glasses, wearing a dark suit, white shirt, and patterned tie, is shown from the chest up. He appears to be speaking or presenting. The image is overlaid with a dark blue semi-transparent layer. The text "MANAGEMENT" and "ENGAGEMENT" is written in large, white, sans-serif capital letters across the lower half of the image.

MANAGEMENT ENGAGEMENT

CEO'S engagement

We, by SYNTONY, are proud to create innovative GNSS solutions for aeronautics, space and public transportation, some of them are dedicated to save lives and improve the daily commuting of end users.

For years we have been innovating, focusing constantly our efforts to provide our customers the simulators and receivers which would best fit their needs in terms of efficiency, reliability and maintenance.

Our teams and partners demonstrate daily their commitment and great passion to that purpose respecting each stakeholder and the environment.

Our Vision

Thanks to our ability to listen and analyze the evolving transportation domains new challenges, we become the world leader in indoor GNSS positioning.

We build partnerships with the most appropriate integrators and distributors in the world, seeking for the best satisfaction of our customers.

Our Culture

SYNTONY means harmony: in our daily behavior and relationships we are committed to offer each stakeholder respect and full listening, it enhances our creativity and ensures a better quality of our innovative product lines.

Our culture is built on our Corporate Social Responsibility.

We respect each other: we listen, we discuss matters, together we find solutions

We promote and facilitate internal and external communication in order to bring new ideas to life.

We are daily committed to better understand the world we live in, so that we can design innovative products which improve the end user's experience!

Our team spirit organization facilitates autonomy, flexibility and innovative working styles for a relationship that is constantly improving internally and externally.

Our Mission

Thanks to our culture based on each individual experience, our mission is

- to save lives through our innovative solutions,
- to dream of unrestricted solutions for location needs (including performance, reliability and sustainability)

The management exemplary behavior

Whether you're managing a business, a team, or any service, you're a role model for your staff. Your values, attitudes, and behaviors set the standard for what you expect from others. As we want our employees to treat each other with respect, each manager must model respectful behavior him(her)self.

What's your role? Who has to apply?

This Code of Conduct applies to all our employees and executives, regardless of their position and grade, in the Head Quarters and all its subsidiaries.

Why a code of conduct?

We hereby want to express our expectations in terms of ethical behavior and practices. Each of us is the ambassador of this Code of conduct.

Would you, at any level, have any question about how to behave in a situation that may violate laws or our internal policies and standards, feel free to collect the best practices around you and promote them.

If you are a manager (managing people or business), you have the full responsibility to ensure open door principle and active listening of your team members to take all appropriate actions.

Let's share our experience!

We, by SYNTONY, are committed to a transparent and open-minded culture. We encourage our employees to express their ideas and mention any unacceptable behavior. We want our employees to share their concerns regarding the application of the Code of Conduct with their peers, managers or anyone they want inside our company. We expect all to feel free to address any potential issue and look for acceptable solution. The management as a whole is of course always open to listen and advice. Especially our Human Resources department is ready to seek for the best experience. Our HR team will always treat these requests, as the others, securely, confidentially and anonymously.

SYNTONY DNA

At SYNTONY, we defined 3 core values we want to promote first:

- We are creative and passionate to design and deliver efficient solutions for our customers.
- We are flexible and adapt our timeline to our customers' expectations.
- Our team spirit and Trust in each other are the key to achieve our targets.

Our DNA is: creativity, innovation, respect, humanity

OUR PEOPLE



Health & Safety

Safety is our core business, but also our priority for each team member.

Our employees and the governance must comply with a number of health and safety obligations contained in our internal guidelines and standards (including our « Règlement intérieur »).

We organize relevant safety training for employees. We also remind of safety instructions and behavior to adopt in case of fire so that everyone becomes a prevention actor.

Our health and safety policy is checked yearly to better analyze the risk factors within our premises and our ways of working. An official document named « Document Unique d'Evaluation des Risques » summarizes each potential risk and the relevant measure(s) (in place or planned).

We also ensure the safety of employees traveling to a country at risk, as specified in our "Travel policy".

Each manager, acting as a model, is a warrant of these health and Safety good practices.

Fostering our Talent through Inclusion & Diversity

Our innovative technologies are invented by talents and dedicated to our customers around the globe. Therefore, we have to understand different habits, ways of thinking/living. As one key element, we recruit talents, without discriminating neither their age, gender, nor nationality, nor disability.

We promote talents by hiring and training apprentices, to better help emerge their skills and potential.

Our goal is to constantly improve our performance by enhancing our respectful working environment on a human scale: small shared offices (6 to 8 Pax helps communication and concentration), lunch-break space, well designed building and offices (air conditioning, natural day light).

We never allow any discriminating nor harassment behavior.

Our employees undertake to respect the clauses relating to commitment to non-discrimination and against harassment included in their employment contract and in the document named « Règlement intérieur ».

Human Rights

We respect human rights by:

- acting in respect of the international human rights laws
- never tolerating any kind of human rights violation

Labour Relations

Active social dialog: meeting our team representatives on a monthly basis to discuss human resources matters enables the well-being of each team member and protect their rights.

Sustainability

Our environmental contribution is large and includes for instance:

- collection and recycling of waste (electronics waste, paper, bottles, etc.) in partnership with companies hiring mainly disabled employees,
- installation of charging stations in our garage for electric vehicles promotes environmental behavior,
- encouraging team members to environment by partly reimbursing their public transportation fees,
- support project creating social link and accompanying young people to discover their potential and dare try their own way



OUR BUSINESS

INTEGRITY

Anti-Bribery and Corruption

SYNTONY has a tolerance ZERO for any bribery or similar behavior. We do not pay or accept bribes.

We only accept gifts or hospitality if:

- the value is reasonable and in line with our internal policies,
- and the gift or hospitality will not influence a business decision.

If you can't easily explain all details of the gifts and situation in front of peers and managers, then you might face a risk! In such a case please raise advice to an appropriate body (direct manager or HR team).

Working with Third Parties

We permanently work and interact with third parties (including customers, suppliers, distributors, resellers, lobbyists, and consultants). And we want them, to have a tolerance ZERO for corruption and any unacceptable behavior. We need to ensure they act and behave in accordance with the relevant standards of integrity (and quality).

Managing Conflicts of Interest

We, by SYNTONY, want to make business decisions based on fair and objective facts and figures. Therefore, we do not accept any personal interests to interfere within our decision processes.

It might happen that you face a potential conflict of interest. As long as you share the situation and declare the need for a neutral body, it's not considered as a problem by itself, but failing to declare and manage it properly may have negative consequences for you and certainly for SYNTONY. Don't hide anything, get advice from the right person, ask your HR department if needed.

Export Control

Governments establish export control laws and impose sanctions and embargoes in pursuit of several interests, including national security and preventing arms proliferation. It is fundamental that SYNTONY be a reliable exporter, as any violation of these laws may have serious consequences, including business disruption and fines. As a result, before working or transacting with any third party or engaging in any export, re-export, or transfer of controlled items, we must ensure compliance with export control laws within the relevant jurisdictions.

Competing Fairly

Competition laws are in force around the world to prevent agreements and practices that may significantly alter or unduly restrict competition in the market. We do not obtain competitive intelligence by illegal or unethical means—including through bribery. When working with customers, we will handle customer classified or proprietary marked information in accordance with the appropriate legislation, policies, and processes.

The background is a blurred photograph of a server rack. A blue label with the word 'SYNTONY' is visible on one of the server units. The overall color palette is dark blue and black with some light blue highlights from the server lights.

SYNTONY

OUR PRODUCTS, ASSETS, AND DATA

No compromise for the Product Safety

SYNTONY's top priority is to ensure the right level of product safety, as SYNTONY has his own responsibility to prevent any accident.

Each employee must do his job to ensure that safety is never at risk.

Our employees are asked to report any concern and mitigate risks immediately

Our engagement for the environment

We want to protect our World against deterioration of our environment.

Throughout our complete value chain, we comply with all relevant environmental laws and regulations.

We expect all our stakeholders including our employees to reduce the SYNTONY environmental footprint and act in line with our environmental sustainability principles.

Let's protect our Assets (tangible and intangible)

We each have a duty to protect SYNTONY's assets (including tangible assets, confidential information and intellectual property) against theft, damage, misuse, and improper disposal.

Our employees undertake to respect the clauses relating to intellectual property and professional secrecy included in their employment contract and with compliance to the IT charter.

When employees are granted to access to Customer and/or state-classified information, any exchange of classified information or material must comply strictly with the required security policies. Any identified risk needs to be declared immediately to SYNTONY's Management.

Our Data Privacy engagement

SYNTONY is engaged to protect the privacy of individuals and comply with applicable personal data protection laws (such as GDPR in Europe).

Our consistent and accurate communication

We must promote and protect our brand to continue to develop SYNTONY's strength in the market.

Our brand and reputation is one of our most valuable assets.



SYNTONY

GNSS