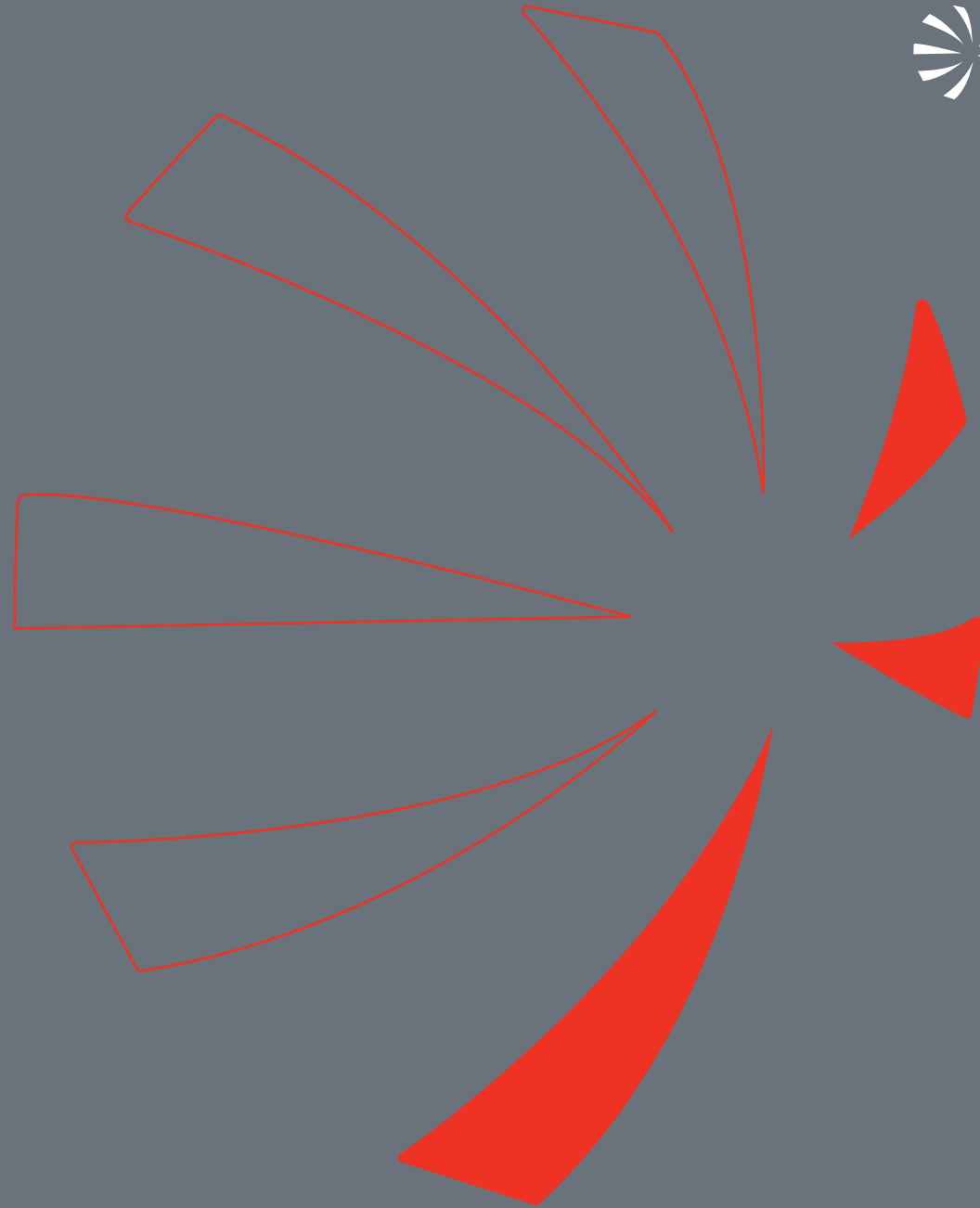


Christopher Martin Road  
Basildon, Essex  
SS14 3EL  
United Kingdom  
Tel: +44 (0) 1268 522822  
Fax: +44 (0) 1268 883140

[www.selex-sas.com](http://www.selex-sas.com)



## ETHICS AND YOU

This publication is issued to provide outline information only and is supplied without liability for errors or omissions. No part of it may be reproduced or used unless authorized in writing. We reserve the right to modify or revise all or part of this document without notice.

2006 © Copyright SELEX S&AS Ltd.  
SELEXS&AS\UK\LFET1\080601\mjpg



Nick Franks  
Managing Director

Ethical behaviour is central to our success. People do business with a company that has a reputation for ethical conduct

## FOREWORD

SELEX Sensors and Airborne Systems (S&AS) UK, is part of the Finmeccanica defence electronics sector, with operations in England, Scotland and the United States. Specialising in world-class integrated sensor solutions, SELEX S&AS UK is a leader in surveillance, protection, tracking, targeting, navigation and control and imaging systems.

SELEX S&AS UK shares the objectives and policies of its parent Company. Within this context, in adopting the Code of Ethics of Finmeccanica, SELEX S&AS UK accepts the principles of fairness and transparency that inspire the policies of the Finmeccanica Group as regards organisation and conduct of business. SELEX S&AS UK is committed to ethical business conduct and the way we all approach our business dealings should demonstrate this commitment.

We must act in accordance with applicable laws and regulations, but we must also conform to the ethical standards we have set ourselves.

Just as importantly, we must be seen by those we deal with, and by others who watch and monitor our industry, to act in that way.

We have put in place five principles of ethical business conduct. This booklet tells you about them and provides in summary the information you need about how to apply the principles on a daily basis to maintain our commitment. It does not deal with every possible situation, but it tells you how to get more information and help when you need it.

Behaving ethically is an essential part of working for SELEX S&AS UK, not an 'optional extra.' It protects our reputation and makes us a company we can all be proud to be part of.

Unethical behaviour will not be tolerated. I am personally committed to making sure we conduct our business in accordance with the highest standards, maintaining and protecting the excellent reputation held by the Company.

## DON'T FORGET:

Ethical business is good business; our reputation depends on it.

### ALWAYS:

- Apply the five principles: accountability, honesty, integrity, openness and respect
- Discourage others from unethical behaviour
- Report it if you think you see it.

### To report concerns or to seek advice, try:

- Procedure documents
- Your line manager
- Other specialists; HR, Legal, International Business Support Manager or SHE Representative

### ETHICS HELPLINE

freephone 0800 374199

## WHAT WAS THAT ABOUT A HELPLINE?

If you have concerns or are simply uncertain about ethical issues, but don't want to talk to your manager or to colleagues, you can now call the **Ethics Helpline**. 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.

Call them if:

- you want advice about ethics
- 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.

A member of Expolink's trained staff will answer your call and listen to your query or concern.

They will take written details then make a confidential report to the Company, but they will not otherwise record your call.

Your details will remain confidential, known only to people specifically involved in any investigation

and its outcome. You don't even have to give your name (though it could help us deal with your problem if you do).

Issues will be passed to the Head of Internal Audit who will make sure that they are investigated and responded to. He will call on other senior executives for advice as necessary. (Your identity will only be disclosed if it is needed for the investigation.)

The Helpline staff will give you a call reference number so that you can contact them again to find out what is being done and get any information that has been provided in response to your call.

The Helpline information is provided to the Head of Internal Audit and Company Compliance Officer.

They will make sure that all issues are dealt with in a timely manner. Half-yearly reports will be submitted to the SELEX S&AS UK Statutory Board - as required by our Operational Assurance Statement.

## WHAT IS ETHICAL BUSINESS CONDUCT?

The five principles of ethical business conduct sum up what ethical behaviour means when applied to working for SELEX S&AS UK.

### ACCOUNTABILITY

We are personally answerable for our conduct and actions.

### HONESTY

We know that there is no substitute for the truth.

### INTEGRITY

We say what we will do and we do what we say.

### OPENNESS

When questions are asked, we are frank and straightforward in our answers.

### RESPECT

We value and treat each individual with dignity and thoughtfulness.

These principles apply to everyone in the company and to everything we do. We will obey the law and behave ethically at all times. All our company policies will reflect this.

Ethical business conduct is more than just a policy: it is fundamental to the way in which we do business, whether we are dealing internally with fellow employees or externally with customers, suppliers, stakeholders and our competitors.

New employees must be made aware of our commitments when they join the Company.

If it's unlawful, dishonest or harmful, it's unethical.

Policy documents, line manager, specialist advisors and now the new Ethics Helpline

## WHAT DO I HAVE TO DO?

Remember the Company will be judged on the way you behave. We must all:

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

Some examples of the standards that are expected:

- Avoid outside interests that could influence - or appear to influence - your judgement at work, such as taking a second job without authorisation.
- Do not misuse your position for individual benefit such as obtaining personal benefits from customers or suppliers.
- Do not act fraudulently such as falsely recording time, expenses and other costs chargeable to the Company or to customers, or misuse Company resources or facilities.
- Do not harass, bully or abuse anyone, either by actions or language, and always ensure compliance with the laws and principles of equal opportunities, without any discrimination, for each and every employee.
- Respect and preserve the confidentiality of personal data and proprietary information the company holds.

- Do not engage in criminal activity particularly where this may cause harm to others, such as dealing in or using illicit drugs.
- Do not give or accept gifts with corrupt intent, or make payments to others for any corrupt purpose.

Generally, any action that is unlawful, dishonest or harmful to others or which is against our policies is unacceptable and is liable to disciplinary action.

External authorities may become involved in serious cases.

### Do I have to report unethical behaviour?

**Yes.** If you think that 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 in the next section. Don't keep your concerns to yourself.

**Not sure?** If you have a concern, report it. Obviously, malicious calls or deliberately giving false information is not acceptable, but if you honestly report a concern that turns out to be unfounded, you will not be penalised in any way.

## HOW DO I GET MORE INFORMATION?

### Policies

Some policy documents spell out how we should behave in certain situations and give further instructions on how to get advice or report problems. You can find them on the Intranet: [http://ectnt09.ct.edinbr.gecm.com/avionics-group/corporate\\_governance/index.htm](http://ectnt09.ct.edinbr.gecm.com/avionics-group/corporate_governance/index.htm). Or select the Corporate Governance link from the SELEX S&AS UK homepage.

### Line Manager

Your supervisor or manager should normally be your first point of contact for information on ethical conduct, reporting concerns, and advice. They are responsible for taking action to correct anything that is wrong.

### Advice

If you don't feel comfortable with talking to your manager, there are other people with specialist knowledge on a variety of ethical matters who can also help you. For example:

- > Personal and employment issues  
*Your HR department*
- > Legal issues  
*Your Legal department*

- Diversity or equal opportunity issues  
*Your line manager or HR*
- Bribery or other corrupt practices  
*The International Business Support Manager on extension 3169 at Basildon*
- Safety, Health and Environmental (SHE) issues  
*Your site SHE representative or SHE Board Representative, or Group Operations Manager on ext 7461 at Basildon.*

You may wonder why financial, safety, health and environmental issues and contacts are included in this booklet. They are important issues with the potential to do great harm to others and ourselves. Enforcement agencies can and will prosecute the Company, and in some cases individual employees, over many sorts of regulatory breaches. We want to know that something may be wrong before matters get that far, so that we have a chance to put things right. Better still, we want to stop problems happening in the first place. That is why you should report concerns in these areas as well.

### ETHICS HELPLINE

You can now also contact an independent and confidential source of advice, available 24/7 on **freephone 0800 374199**.