



# Code of Ethics



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### **1. Purpose of this code**

This Code of Ethics sets out the fundamental ethical principles that must guide professional practices and behaviors toward all Galactic stakeholders.

### **2. How to use it?**

Every individual is responsible for complying with this Code of Ethics, as well as with all applicable laws and regulations.

This Code serves as a practical guide for conducting business and should be consulted whenever questions arise in daily activities.

If you are unsure how to proceed in a specific situation, you should contact your line manager or the Human Resources Department.

### **3. Who is it for?**

All Galactic stakeholders have a duty to act in accordance with this Code daily.

“Stakeholders” refers to all Galactic employees, wherever they are located, and at all levels of the organization, including senior managers, executives, directors, permanent employees, fixed-term employees, temporary employees, interns, homeworkers, agency workers, casual workers, and volunteers.

This Code also applies to all individuals and entities conducting business on behalf of Galactic, including agents, distributors, joint venture partners, consultants, and other third-party intermediaries.

We expect them to respect the principles set out in this Code of Ethics and to comply with all applicable laws and regulations in the countries in which they operate.



## **OUR 8 PRINCIPLES OF ETHICS**

### **1. Anti-corruption<sup>1</sup>**

Galactic is committed to maintaining the highest standards of integrity and ethical conduct.

Collaborators must not engage in bribery, whether directly or indirectly, including through intermediaries such as agents or consultants. We strictly prohibit offering, promising, giving, requesting, accepting, or receiving any bribe or undue advantage to obtain or retain a commercial or financial benefit for oneself or for Galactic.

Galactic emphasizes transparency in financial transactions:

- The use of cash for payments related to invoices, commissions, or other business activities is strongly discouraged.
- All business partners must be properly registered in our financial system.
- Legitimate business expenses, such as hospitality and promotional expenses, are permitted when consistent with applicable laws and customary business practices.
- Galactic does not permit direct financial contributions to political candidates, political parties, or political campaigns using company resources. Any indirect contribution through third parties must be disclosed and approved in advance.
- Charitable donations, whether financial or in-kind, must receive prior approval from designated supervisors. Transparency must be ensured, and any potential conflict of interest must be carefully assessed.
- Sponsorship agreements must align with Galactic's values and objectives and require prior approval from designated supervisors. Compliance with all applicable laws and regulations is mandatory.

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<sup>1</sup> Corruption is defined as the conduct by which a person (public or private) proposes, requests, or accepts, directly or indirectly through an intermediary, a gift, offer, promise, or benefit of any kind in order to perform, delay, or omit an act within the scope of their duties, with the objective of obtaining or retaining a commercial or financial advantage or influencing a decision.

## **2. Anti-discrimination**

Everyone has the right to work in an environment where they are treated with dignity and respect. Galactic is committed to fostering such an environment, recognizing that diversity and inclusion contribute directly to the success of the organization.

Galactic is an equal-opportunity employer. Recruitment and employment decisions are not based on sex, disability, family status, sexual orientation, age, political opinions, religious beliefs, trade union activity, or racial, social, cultural, or national origin.

Engaging in discriminatory practices is strictly prohibited.

## **3. Anti-harassment**

Galactic does not tolerate any form of harassment, including intimidation, abuse of authority, or physical, verbal, sexual, or any other form of harassment.

We promote a work environment in which employees treat one another with respect and professionalism. Any employee who feels harassed or discriminated against must report the incident to their manager or to the Human Resources Department.

## **4. Human rights**

We are committed to respecting the human rights of our employees or people acting on our behalf, as well as those of our customers, suppliers, and other business partners, in accordance with the United Nations guidelines on business and human rights.

- Fight against child labor: Galactic employs only individuals who meet the applicable local minimum age requirements. We comply with relevant International Labor Organization (ILO) conventions to ensure that children are protected from exploitation, safeguarded against health risks, and able to continue their education.
- Fight against forced labor: Galactic strictly prohibits forced labor. Employment must be voluntary and freely chosen.



## **5. Health and safety**

Galactic is committed to maintaining a safe and healthy working environment for employees, visitors, and contractors. Health and safety are shared responsibility. Employees are encouraged to raise any concerns regarding health and safety risks or unsafe working conditions and to report accidents or work-related incidents promptly.

Preventive measures are implemented, and corrective actions are taken without delay when unsafe or hazardous situations are identified.

## **6. Work conditions**

Galactic ensures compliance with applicable local laws and relevant industry standards regarding working hours, working days, and rest periods. Employees are expected to work within reasonable daily and weekly schedules, with appropriate rest periods provided.

Galactic is committed to promoting a healthy work-life balance. If a situation disrupts this balance, employees should inform their manager so that the causes can be identified and corrective measures implemented.

## **7. Data protection**

Galactic is committed to protecting the confidential information of its customers, employees, suppliers, and other stakeholders and is subject to a duty of confidentiality. We comply with the European Regulation on the protection of personal data<sup>2</sup>.

Galactic collects, uses, stores, and processes personal data in accordance with the GDPR<sup>3</sup> and any replacement legislation or similar regulation under applicable law,

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<sup>2</sup> *Personal data means any information relating to an identified or identifiable natural person, directly or indirectly, including by reference to a name, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.*

<sup>3</sup> In this Code of Ethics, "GDPR" refers to Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons regarding the processing of personal data and on the free movement of such data (General Data Protection Regulation).



as well as any regulatory requirements or codes of practice governing the use, storage, or transmission of personal data.

Personal data is processed on the following legal grounds:

- Performance of a contract with the Customer or pre-contractual measures taken at the request of the Data Subject;
- Compliance with legal or regulatory obligations, including those relating to contractual management and invoicing;
- Legitimate interest in responding to information requests from Visitors and Customers;
- Legitimate interest in sending promotional communications (direct marketing) to Customers;
- Explicit consent for sending promotional communications (direct marketing) to Visitors.

In accordance with these regulations, Galactic reserves the right to use your data, if it is up-to-date and processed only as long as necessary to achieve the company's objective or as required by law.

Respect for confidentiality ensures the maintenance of trusting relationships with its various stakeholders.



## **8. Conflict of interest**

Everyone is responsible for acting in Galactic's best interests and avoiding situations where personal interests (financial or otherwise) may conflict, or appear to conflict, with the interests of Galactic.

Conflicts of interest may arise when personal interests or external activities make it difficult to perform duties objectively and effectively.

Examples include:

- Participating in activities that directly or indirectly compete with Galactic.
- Using Galactic property, information, other resources for the benefit of third parties.
- Engaging in outside employment or other activities that negatively impact your job performance or interfere with responsibilities at Galactic.

Both actual conflicts of interest and the appearance of conflicts must be avoided.



## **REPORTING PROCEDURE**

### **1. Communicate on an ethical issue**

Galactic relies on its employees to maintain a culture of honesty and ethical conduct.

All board members, officers, employees, and volunteers are responsible for reporting concerns regarding violations or potential violations of Galactic's Code of Ethics, internal policies, or applicable laws.

Reports must be made in good faith and based on reasonable grounds. Allegations that are knowingly false or made maliciously will constitute a serious disciplinary offense.

### **2. Whistle-blower Protection**

Galactic undertakes to protect the identity of any whistleblower who reports a breach of this Code or a serious threat to the general interest of which they have personal knowledge.

Galactic will use its best efforts to protect whistleblowers against any form of retaliation. Reports will be handled with sensitivity, confidentiality, and discretion, within the limits permitted by law and the circumstances.

Galactic is committed in particular to protecting whistleblowers against:

- Threats of physical harm;
- Dismissal;
- Punitive work assignments;
- Any negative impact on salary or fees.

Any whistleblower who believes they have been subject to retaliation may file a written complaint with the Chief Executive. All complaints will be promptly investigated, and appropriate corrective measures will be taken if the allegations are substantiated.



### 3. Making a Disclosure

If you have been aware of any misconduct, Galactic encourages you to first report it to the person listed below:

#### **Whistleblowing Report Manager**

*Rebecca Nahmias*

*+32 476 73 76 81*

*RNAH@lactic.com*

A dedicated email address is available for reporting:

[EthicsAlert@lactic.com](mailto:EthicsAlert@lactic.com).

This mailbox is accessible only to the Whistleblowing Report Manager.

All reports are collected and reviewed by the Whistleblowing Report Manager, who ensures proper, diligent, and timely follow-up in accordance with applicable legislation.

The Whistleblowing Report Manager will confirm receipt of the report to the whistleblower within a maximum of seven working days, provided that contact details have been communicated.

Anonymous reports will be examined on an equal basis, provided they contain sufficient information and reasonable grounds to enable appropriate assessment and follow-up.

The Whistleblowing Report Manager may request additional information from the whistleblower regarding the report filed and the allegations contained therein, provided that contact details are available. The Whistleblowing Report Manager will inform the whistleblower, within a maximum of three months of any follow-up action taken, as well as the status and outcome of the internal investigation, provided that contact details are available.

Galactic will organize an anonymous review of the reports received on a yearly basis, unless a different timeframe is required. These reports will be discussed with the existing committee responsible for protection and safety at work.

