



GROUP GENERAL MANAGEMENT POLICY 1

Code of conduct

Référence	Version	Date
YUZIT	1	May 2022

Validation	Signature
Paul Boudre, CEO	<div>DocuSigned by:</div>  <div>46C4ACBF1ED643C...</div>
Patrick Noonan, General Counsel	<div>DocuSigned by:</div>  <div>6AE90D6E608A46A...</div>
Pascal Lobry, EVP People and sustainability	<div>DocuSigned by:</div>  <div>5DDB8BE0BCB34AF...</div>

Executive summary:

- This Code of conduct defines Soitec's key values, principles and expectations.
- All employees, business partners and stakeholders are expected to comply with this Code of conduct.
- Compliance with this Code of conduct is mandatory, no tolerance will be allowed in case of violation.

Content

CEO statement	3
Use of the Code	4
Health, Safety & Environment	5
Conflict minerals	6
Diversity and Inclusion	6
Human Rights	7
Community Impact	8
Data Privacy	8
Operate Safely and protecting our Assets	9
Product Safety	9
Quality	10
Protecting our assets	10
Confidential Information and Intellectual Property	11
Act with Integrity	13
Insider Trading	13
Internal Control	13
Anti-Bribery and Corruption & Gifts and Hospitality	14
Conflict of Interest	14
Export & Trade Control	15
Anti-money laundering	15
Know your Partner	16
Fair Competition	16
Reporting violations	17
Appendix to Soitec's Code of Conduct	18
Management of incident reports under Soitec's Code of Conduct	18

CEO statement

While Soitec is growing and becoming a large multinational Group at the very top of the microelectronics value chain, permanently creating industry standards by making possible the adoption of innovative technologies, our employees, colleagues, customers, suppliers, partners and the communities in which we operate expect us to be clear on the values we hold that underpin who we are.

As defined in Soitec's corporate purpose "*We are the innovative soil from which smart and energy efficient electronics grow into amazing and sustainable life experiences*".

Our Code of conduct, based on this commitment, in conjunction with the Group Policies, define our values, supporting principles and the expectations we place on our people, business partners and stakeholders in order to maintain consistent highest standards of integrity, respect and value of people, the environment, health and safety across the Group when carrying on our business and activities.

Compliance with our Code of conduct and Group Policies is mandatory and there will be no tolerance for any violation. If you have any doubt or questions, discuss the issue with your manager or one of the contacts made available to you within the Group prior to acting.

Our Code of conduct and Group Policies are cornerstone to our Group sustainable development and success, and you can count on me and the management as we count on each of you to comply, share and promote them across the Group and with all our business partners and stakeholders.

Paul BOUDRE
Chief Executive Officer



Use of the Code

The information contained in this Code of conduct provides the tools to make sound decisions.

Whenever the answers to some questions are not easy, consider the following in your decision-making:

- Is this course of action permitted by the Group's Code of conduct and/or Group Policies?
- Will this decision put my company and/or the Group at risk, or may be an unlawful or unethical position?
- Will this course of action potentially damage my company and Group's activities and/or reputation?
- Have I carefully considered the potential consequences of my actions?
- Will I be uncomfortable explaining my decision to colleagues, family or friends?
- Have I consulted with all available company resources to help me making the right decision?

In addition to this Code of conduct and the Group Policies we must comply with laws and regulations that apply to our business, especially when they are more stringent than the Code of conduct and/or the Group policies.

Health, Safety & Environment

Values

We are committed to taking care of our health, our safety and the environment ("HSE"), operating safely. We believe that a safe and healthy workplace, that also minimizes our environmental impact, is a better place for our people, our customers and our business. Our HSE performance is fundamental to our success and an integral part of how we work every day.

Key principles

We are committed to the highest standards of behavior for protecting our own and others' health and safety and the environment in which we operate.

We take personal and collective responsibility, along with our suppliers, contractors, joint venture and other partners, to:

- operate safely in all our business and activities and operations;
- create a working environment that supports employee wellbeing, with an aspiration towards zero work-related illness, accidents or harm to people;
- prevent or minimize any adverse environmental impact from our activities, products and services, support the sustainable use of resources and strive for no environmental incidents; and
- provide a safe, healthy and productive work environment.

Climate change: Soitec joined the Science-Based Targets initiative (SBTi) – led by CDP Worldwide, the World Wildlife Fund (WWF), the World Resources Institute (WRI) and the United Nations Global Compact program – and adopted the trajectory limiting global warming to 1.5°C above pre-industrial temperatures, alongside 1,000 other global pioneers.

Responsible water and energy management: Soitec is committed to reduce its water and energy consumption by optimizing its industrial processes.

Expectations

Each one of us will:

- Take accountability to reduce risks and impacts throughout our activities, products and services;
- integrate HSE into our business processes and decision making;
- not consume psychoactive substances before or during working hours or during meal or rest breaks, nor attend work under their influence;
- not smoke or use tobacco products other than in the permitted areas, if any;
- follow local health and safety procedures when working with chemical products in the workplace;
- speak up if concerned about an activity or decision and seek advice and support when necessary.

Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage. For Soitec SA please see Annex 1 to the Règlement Intérieur.

Contact: service-hse-soitec@soitec.com

Conflict minerals

Key principles

In the course of its activities, Soitec may use minerals that are regulated by the EU Conflict Minerals Regulation (2017/821) and the Dodd-Frank Act in the United States.

As part of its commitment, Soitec is conducting due diligence on the sourcing and traceability of conflict minerals. Impacted suppliers are specifically included in the Green Partner approach, and they are required to submit a report using the template developed by the Responsible Minerals Initiative to facilitate the circulation of information throughout the supply chain and ensure the traceability of these materials.

Related policies and documents

Please refer to the Code of Conduct Related Policies Annex to be found in the Group Policies' section on the intranet webpage to locate all Chemical products management system policies for more details.

Contact: quality_support@soitec.com

Diversity and Inclusion

Values

It is through our people that we fulfill our potential, achieve our vision and execute our strategy, and each of us has a role to play. We all need to be pioneers and seek diverse and inclusive ways to work. Our global People policies supports all of us -and our Group as a whole- in achieving this, and in creating a working environment where each of us is able to be at its best.

Key principles

Our policies relating to our people articulate what we expect of you and the support you get from us as an employee or in your duties as a manager in our business.

The following are among the key principles of our policies:

- promoting diversity and inclusion,
- Implementing a zero-tolerance policy against harassment or discrimination. Any breach may be subject to sanctions.

Anti-discrimination

We are committed to building a culture of respect and appreciation, giving everyone the opportunity to be themselves and to realize their full potential.

Therefore:

- We treat each other openly, honestly, and courteously.
- We do not tolerate bullying, harassment or discrimination and support everyone to report about any instance which they experience or observe as per the Group whistleblowing process.



Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage. For Soitec SA please see Annex 4 to the Règlement Intérieur.

Contact Please contact your local HR or the Group HR department.

Human Rights

Values

Our Group commits to comply with the fundamental conventions of the international Labor Organization, the OECD guidelines as well as the United Nations Free & Equal Standards of Conduct against homophobia and transphobia and expects its supplier to have similar commitments.

We know that to deliver excellence, we must respect human rights, and act in a socially responsible manner, complying with all applicable laws, and respecting the communities in which we operate. This shall apply without limitation, in providing safe and healthy working conditions, guaranteeing freedom of labor association and the right to collective bargaining, the prohibition of modern slavery, forced or child labor and human trafficking.

Key Principles

Our policy is meant to help us:

- work together by involving our people in the activities of our business, embracing and celebrating difference, including in an inclusive environment, fairly rewarding our people and providing employment that is freely chosen and tackling any form of discrimination;
- conduct our business by recruiting, selecting and developing people on merit, providing a safe working environment;
- protect the environment, support the communities in which we work; and
- speak-up if you think we or our suppliers are not complying with this policy.

Expectations

We must:

- ensure that each Soitec company recognizes employees for their performance and contribution based on our Group values, and comply with national laws and regulations;
- not use forced or involuntary labor;
- comply with child labor laws and be committed to the development of young people;
- be alert to the risks vulnerable people may face and seek to ensure this Group is free from discrimination;
- select suppliers and partners whose core values and commitment to ethical business conduct match our own;
- comply with all legal and regulatory security requirements, and
- work to prevent or minimize negative impacts to the environment of our products and services.

Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage and the collective agreements signed with the representative trade unions applicable to the unionized entities of the group relating to gender, generation and quality of life in the workplace.

Contact Please contact your local HR or the Group HR department.



Community Impact

As a multinational Group we seek to build positive relationships with the communities around us and therefore may give charitable contributions, to the extent always that they are not a form of bribery or corruption which is strictly prohibited under this Code of conduct and by law, and comply with the Gifts and Hospitality annex to the Anti-Bribery and Corruption Policy.

Values

We direct our support for charitable contributions within one or more of the following four areas:

- Education and skills: with a focus on science, technology, engineering and mathematics, which are key to our business including without limitation, with targets to fight digital divide and social divides in general, access to education, including access by women to scientific education;
- Environment: adding value, and a social dimension to the company environment strategy.

Key Principles

Strictly apply the Gifts and Hospitality (Annex 2 to Group Anti-corruption and bribery Policy) to any considered charitable contribution.

Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage.

Contact Please contact your management or Compliance team: compliance@soitec.com

Data Privacy

Key principles

Soitec is committed to protecting the privacy of individuals and to complying with applicable personal data protection laws wherever it operates and in particular but without limitation, with the European Union's General Data Protection Regulation (GDPR) when collecting or processing personal data.

Related policies and documents

Please refer to the Group Policies' section on the intranet webpage to locate the Group Policy on Data privacy for more details.

Contact: Data protection Officer: dpo@soitec.com

Operate Safely and protecting our Assets

Product Safety

Values

Soitec provides high-value components.

Our commitment to the safety of our products is a core value.

Key principles

Our approach to product safety:

- We make accountability for product safety clear and ensure people understand what they are accountable for.
- We design our products to achieve a high level of safety consistent with their application, always ensuring that we comply with the relevant company, legal, regulatory and industry requirements.
- We assess what could go wrong and put controls in place to meet the required safety levels throughout the product life cycle and reduce the safety risks so far as is reasonably practicable.
- We evaluate how human and organizational factors can introduce risks to product safety and use our understanding when setting our controls.
- We are committed to the continuous improvement of product safety and actively engage in setting industry standards and good practice.
- We measure our performance and rigorously investigate and resolve safety-related issues, systematically embedding the learning from these back into our practices and processes.

Everyone is encouraged to report any product safety concerns. Robust quality is an essential building block of product safety and by following our processes we ensure that our products conform to their specification.

Always speak up about a product safety concern if you see one, report it if you have any doubt and remember, we are committed to treating everyone fairly and without prejudice in accordance with Our Code of conduct.

Always follow the parts of the Soitec Quality Management System applicable to your role. You should feel able and supported to perform the tasks assigned to you. If you are being asked to do something which you do not feel qualified and/or experienced enough to do you should discuss with your manager.

Make sure you attend the Safety Awareness training appropriate to you.

Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage.

Contact: Group Quality Management Department



Quality

Values

Soitec continuously invests in facilities, technology and outstanding people so that we can constantly improve the quality and efficiency of our products and services.

Robust quality is an essential building block of product safety and by following our processes we ensure that our products and those of our suppliers conform to specification.

We are continually improving effectiveness in our operations and processes using lean principles by focusing on customer value adding activities and eliminating waste.

Process efficiencies are embedded in the Soitec Management System which is applied across the company and in all of our operations. For us to be trusted to deliver excellence, this means that quality is central to everything we do.

Each year we review performance and set improvement targets for our business processes and quality performance.

All employees should read and follow the high standards set out in the Quality procedures and processes applicable to their role that safeguard the safety, quality and reliability of our products and services.

Managers should ensure that everyone in their teams is working in a way that does not contravene any of these standards, processes or procedures.

Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage.

Contact: Group Quality Management Department

Protecting our assets

Key principles

Soitec generates valuable assets, whether tangible or intangible such as its know-how, trade secrets, invention whether protection by intellectual property rights and assets entrusted by third parties.

Also, Soitec's reputation is an important asset, and any external communication shall be done following internal procedure and be coherent.

Soitec and its employees are committed to help protect such assets and preserve them against all forms of deterioration, damage, theft, or misappropriation, even after having left the Group.

Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage. For Soitec SA please see Annex 1 to the Règlement Intérieur.

Contacts

Legal department: legal@soitec.com



Security department: security@soitec.com

Confidential Information and Intellectual Property

Values

Intellectual property is a critical element of our engineering expertise, global reach and deep industry knowledge that keeps Soitec ahead of technological improvements.

Failure to protect Soitec's intellectual property could lead to our technology advantage being eroded.

Failure to respect relevant intellectual property rights of others could lead to legal action, the confiscation of our products and significant financial penalties.

During the course of its activities, Soitec may also generate or have access to confidential data relating to its business activities and for which Soitec.

This could include information related to external stakeholders such as customers, suppliers or other business partners. Confidential information includes but is not limited to financial data, human resources and personal data, information with respect to acquisitions, divestitures, orders and new products or business strategies, product improvements, technical information, systems, trade secrets or other know-how developed or acquired by Soitec.

Key Principles

Intellectual property laws protect the originators of products, services and creative works. They restrict others from either copying the results of the originator's work or passing themselves off as the originator. In particular, intellectual property laws protect inventions, brands, the shape and design of articles, and the words and pictures in documents, all of which are created and used day-to-day in one form or another across Soitec's business activities.

Our key principles are:

- registered rights in patents (a legal right to protect inventions such as design arrangements, manufacturing methods or material compositions) and trademarks (a legal right to protect names and/or logos for companies, products or services) can be applied for at government intellectual property offices and, if granted, give the owner a monopoly right preventing use by others, even if they are unaware of the right and arrived at the same result independently;
- unregistered design rights (legal rights protecting the shape and configuration of articles) and copyright (a legal right protecting the composition of words, pictures and sounds in any medium) generally arise without registration (and are reinforced through appropriate markings, such as those in our standard document templates) and prevent direct copying by others, however unregistered rights do not prevent use by others of things they have created independently; and
- contracts are used to protect information, documents and other items and to set out ownership and rights of use of intellectual property when two or more organizations work together.



Statutory laws and your employment contract assign ownership of intellectual property you create in your job to Soitec, and Soitec is liable for the consequences of your use of intellectual property in your job, including the use of intellectual property belonging to others.

You must ensure Soitec's intellectual property receives the relevant protection available, and that you carry out your job with due respect to the intellectual property of others, including our competitors.

Access to confidential information is restricted to employees whose function specifically requires the use and handling of this data. All confidential information must be safeguarded and used only for authorized purposes. These requirements continue beyond the terms of employment.

Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage.

Contacts

Legal department: legal@soitec.com

Security department: security@soitec.com

Act with Integrity

Insider Trading

Using inside information to buy or sell securities listed on the stock exchange or sharing inside information with someone else who then trades securities listed on the stock exchange is subject to sanctions for “insider trading”. These sanctions can include significant fines and prison sentences.

Key principles

Inside information is information that is not public and is likely to have an influence on the price of Soitec shares or securities. This is particularly the case of strategic plans, trends and forecasts for sales and earnings, planned dividends, significant financial or legal commitments, pending or future mergers, acquisitions and transfers, and changes among top executives.

An insider is any person who holds inside information.

Soitec encourages its employees to become shareholders but in no event the employees may buy or sell shares or securities when they possess inside information or during no trading periods.

No inside information must be disclosed to any person other than as documented and approved in accordance with the internal procedure published on the intranet.

Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage.

Contact Corporate department: compliance@soitec.com

Internal Control

Key principles

As a publicly listed company Soitec must provide true and accurate information in all matters related to accounting and financial reporting. Any irregularities may have serious consequences.

Soitec has an Internal Control framework in place to ensure the integrity of its books and records. We have implemented detailed processes to maintain the accuracy and reliability of accounting entries, financial reporting, and compliance with internal rules and procedures, applicable laws, regulations and requirements.

All employees have a responsibility to ensure that all records, reports or information they produce are accurate, honest, fair and timely. These records include but are not limited to: financial reports on projections, research reports, marketing information, sales reports, tax returns, expense reports, margin reports, time sheets, environmental and social information and any other documents submitted to governmental or regulatory bodies.

Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage.



Contact: Group Head of Internal Control (Finance Department)

Anti-Bribery and Corruption & Gifts and Hospitality

The Group is committed to fight against corruption and influence peddling and implements a zero-tolerance principle against those practices. These laws are complex and can give rise to severe civil and criminal penalties (including imprisonment, which can apply to persons in addition to legal entities).

Key principles

As per the Group Anti-corruption Policy:

1. Payments in cash are prohibited.
2. Contributions to political parties are prohibited.
3. Facilitation payments are prohibited.
4. Any attempt to obtain any kind of preferential treatment from a public official by any means whatsoever, including gifts, invitations, cash or any other advantage is prohibited.
5. The offer and acceptance of gifts and hospitalities are strictly limited (as per Appendix 2 of the Group Anti-corruption Policy)
 - No gifts or hospitalities to government employees, whether being government officials, belonging to a government organization or a government affiliated company.
 - No gift in cash to be given to anyone.
 - Upon specific threshold, specific acceptance process.
6. No matter the amount, donations to charities may be authorized if:
 - not raising a conflict of interest,
 - of a reasonable amount, and
 - have been authorized in writing by the corresponding executive VP of the concerned department and registered with Compliance prior to engaging.
7. Sponsorships and donations to charity may be authorized provided that :
 - they do not raise a situation of conflict of interest,
 - are of reasonable amount,
 - have been authorized in writing by the corresponding executive VP of the concerned department and registered by Compliance, and
 - sponsorships are strictly limited to financial contribution to professional conferences for marketing operations.
8. No commitment nor contract shall be made with customers, suppliers of 1st rank or intermediaries following specific risk factors, without having completed prior third-party due diligence, as introduced in Appendix 1 of the Group Anti-corruption Policy.
9. Any potential conflict of interests must be reported in writing by the person in a situation of conflict for prior written approval to his/her line manager in charge of whether accepting it or implementing mitigation measures and document the overall process.
10. Due diligence on the partner is conducted by the compliance department in the frame of mergers and acquisitions.

Conflict of Interest

Key principles

A conflict of interest can arise when social, economic or political activities of employees, or those close to them, influence or could influence their objectivity and loyalty to Soitec.



Working in a position or function or holding a financial interest in a competing organization, customer, supplier or commercial partner of Soitec, when your duties within Soitec allow you to have an influence over this relationship, constitutes a conflict of interest.

You must avoid conflicts of interest as your decisions at Soitec shall not be influenced by personal or private considerations.

But if you find yourself in such a situation, you must pre-declare it and inform your line manager in writing regarding any situation that could represent a conflict of interest or give the impression of influencing your judgment and actions and withdraw from decision-making that creates or could be perceived to create a conflict of interest so as to remain impartial, professional and competitive in your dealings with contractors and suppliers.

Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage.

Contact: compliance@soitec.com

Export & Trade Control

Key principles

Soitec commits to comply with applicable export control laws and trade regulations and with applicable sanctions and embargoes (the "Trade Regulations").

Soitec classifies products and technology requiring export licenses, and obtains licenses when required. Soitec implements controls to not deal with parties subject to embargo sanctions or export blacklists.

Non-compliance with Trade Regulations can result for Soitec in charges, fines and impact on operating our business: difficulties in obtaining licenses, risk of being blacklisted by governments, disruption or termination of relations with banks and suppliers, restrictions on travel. For Soitec employees such failure can result in serious consequences including fines and/or imprisonment.

Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage.

Contact : Group Export Control Manager and/or the Compliance Team.

Anti-money laundering

Key principles

Money laundering is the process of taking funds obtained from criminal activities such as tax evasion, corruption, financial fraud, or terrorism and disguising the illegally obtained funds to make them look legitimate.

In that respect, Soitec is conducting its business with reputable customers involved in legitimate business activities and only accepts funds received from legitimate sources.



Know your Partner

Key principles

It is required to complete integrity check and/or export and trade controls verifications prior to engaging with third parties as per criteria defined in the Anti-Corruption and Bribery Policy and/or Export & Trade Control Policy.

Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage.

Contact

Compliance department: compliance@soitec.com

Group Export Control Manager.

Fair Competition

Key principles

The Group is committed to complying with antitrust laws and regulations and does not tolerate any violation.

You must not:

- agree with a competitor to not compete;
- agree with a competitor to fix prices or allocate markets or market shares;
- agree with a competitor on production or sales quota.

In addition, an arrangement with a customer or a supplier, which has the object or the effect to exclude a competitor from the market or to restrict market access is likely illegal and requires prior assessment by the Compliance team before being made.

Related policies and documents

Please refer to the Annexes to this Code on the intranet webpage.

Contact: compliance@soitec.com

Reporting violations

What can be reported?

- Any violation of the Code of Conduct, and/or
- any other type of violations national applicable law defines as being eligible to reporting (for France please see notably all the subjects defined by the “Loi n°2022-401 du 21 mars 2022 visant à améliorer la protection des lanceurs d'alerte”, among which information relating to a crime, an offense, a threat or harm to general interest, violation or attempt to concealment of a violation of an international agreement, violation of any regulation to the extent it involves or impacts Soitec.

Who may report?

Any Soitec employee, including temporary staff, internship students or apprentices, as well as ex-employees and any other third parties (such as shareholders, any Board members, subcontractors) may report a violation, provided they do not receive any financial compensation/are not remunerated in any way for reporting.

How shall the report be made?

The report may be in writing or orally, either addressed to the line manager and/or Human resources department and/or Compliance department, or by email to ethics_alert@soitec.com.

The report may be made when an individual:

- witnesses or is aware of a violation,
- acts in good faith

For the avoidance of doubt, the facts, information, or documents, whatever their form or medium, covered by national defense secrecy, medical secrecy or confidentiality of relations between lawyers and their clients, will not be eligible for a report hereunder.

Further information on the “Management of Incident Reports under Soitec’ Code of Ethics and Business Conduct” is detailed in the Appendix hereto.

How is the violation report processed?

- The alert is processed by a qualified person, not having a conflict of interest in relation to the violation reported and bound by a confidentiality agreement.
- The process guarantees the protection of the identity of the issuer as well as the persons targeted and the nature of the events.
- If necessary, an investigation is carried out to enable facts to be established, and elements of proof to be obtained, and must make it possible to ensure the reality and materiality of the facts reported.
- Depending on the outcome of the investigation, disciplinary or legal proceedings may be initiated.
- If misconduct is confirmed, SOITEC considers not only appropriate disciplinary action for the employees involved, but also engages in a root cause analysis of the misconduct in order to continuously improve ethics and compliance procedures.

In case of any uncertainty or doubt regarding the interpretation of any clauses of this Code, Soitec’s employees may consult their direct manager, the Human Resources Department or



the Legal Department. Third Parties may consult the Legal Department. They will advise you about the best way to proceed.

Appendix to Soitec's Code of Conduct

Management of incident reports under Soitec's Code of Conduct

Complementary to local reporting: The reporting process to the Group ethics_alert@soitec.com Correspondent is complementary to any other local hotlines put in place.

Any incident report will be treated with the highest degree of confidentiality and confidentiality of the person making the incident report will be guaranteed as well as all personal confidential data as they are collected, communicated and preserved.

Notification of Group Ethics Correspondent

Any incident report which has been made either through regular hierarchical reporting channels existing in the Group or hereunder must be transferred immediately to the ethics_alert@soitec.com, who in turn, in strict compliance with the law and depending on the subject of the incident report, on a need to know basis, must inform the General Management and the Audit Director.

Protection of individual rights

SOITEC guarantees that no employee or stakeholder who are reporting an incident, or those who assist to report an incident in good faith shall be subject to any form of retaliation or disciplinary action. Anonymity of the person reporting shall be protected by all means.

Information about the individuals named in a report

Any person who is the object of an incident report and who is subject to the verification process hereunder report will be presumed innocent. The person will be informed by the management, heard in the frame of the verification process unless the process is abandoned.

When conservatory measures are necessary, in particular to prevent the destruction of evidence, the person who is the object of a report will be informed after the adoption of these measures.

The ethics_alert@soitec.com is contractually bound by an enhanced obligation of confidentiality and will recall this obligation of confidentiality to any person who, in accordance herewith, may receive personal data when necessary for the handling of the report at certain stages.

Data Security and Data Rectification

The Group ethics_alert@soitec.com will take every necessary precaution to preserve the security of the data as it is collected, communicated and preserved.

In accordance with French data protection law, any individual identified hereunder will have a right of access and of rectification of any personal information related to him/her by contacting the ethics_alert@soitec.com. Reports may only be kept for the time strictly necessary and proportionate to their processing and to the protection of their authors, the persons they target and the third parties they mention, taking into account the time limits



for any additional investigations. Data relating to reports may however be kept beyond this period, provided that the natural persons concerned are neither identified nor identifiable.

