

Speak Up Policy

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ITP Aero is part of the Rolls-Royce group of companies and is subject to the same standards of behaviour as the rest of Rolls-Royce. ITP Aero has adopted this Policy based on the equivalent Rolls-Royce Group Policy. This Policy is mandatory and applies to all employees and workers of ITP Aero, including the parent company and all its subsidiaries. This Policy sets the minimum standard that must be followed. Where local laws, regulations or rules impose a higher standard, that higher standard must be followed.

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Introduction

It is vital that all employees and stakeholders support the Ethics & Compliance programme and we encourage them to act as our first line of defence by speaking up when they see, or become aware of, unethical behaviour. ITP Aero is committed to having an environment where employees can raise concerns and ask questions without fear of retaliation.

ITP Aero is part of the Rolls-Royce group of companies and so is subject to equivalent standards of behaviour to the rest of Rolls-Royce. ITP Aero has adopted this Speak Up Policy (“Policy”) based on the Rolls-Royce Speak Up Policy. It contains the same fundamental requirements, but is appropriately amended to reflect the fact that ITP Aero remains a corporate entity and does not have access to all of the Rolls-Royce policies, processes and systems, which rely upon a network connection. In spite of this, ITP Aero administrators, directors, employees are expected to adhere to these equivalent standards.

This Policy is mandatory and applies to Board of Directors, senior management and employees of ITP Aero and its subsidiaries (referred here collectively as “ITP Aero” or “Company”). This Policy sets the minimum standard that must be followed. Where laws, regulations or local rules impose a higher standard, that higher standard must be followed. Breaches of the ABC Policies, including this Policy, is considered a failure to comply with work obligation and may result in disciplinary action up to and including dismissal.

This Policy:

- Provide a framework for our approach Speak Up
- Sets out our Speak Up standard

Your responsibility

To read, understand and comply with this policy;

Raise any questions or concerns you might have. There is advice on how you can do so in Section 2.

Your manager’s responsibility

To understand this policy and make sure that they do not ask you to work in a way that contravenes it.

Common terms

Ethical concerns

A problem or situation that requires a person or organization to choose between alternatives that must be evaluated as ethical or wrong.

Line Manager

The employee who approves the expenses of another employee.

Compliance Officer

An employee who ensures a company complies with its outside regulatory requirements and internal policies.

Export Control

The set of laws, policies, and regulations that govern the export of sensitive items for a country or company.

Local Ethics Adviser

A person who will help the employee to find an answer to, or resolve, an ethical concern.

Subject Matter Experts

A person who can respond the question or concern if required. They are able to advise or investigate.

ITP Aero Ethics Line

Where you can ask questions and raise concerns about Ethics & Compliance without fear of retaliation.

Rolls-Royce Ethics Line

Where you can ask question and raise concerns about business ethics without fear of retaliation.

Ethics & Compliance Team

Ethics & Compliance Team is part of Organisation & Resources Dptm. The aim is to provide strong governance throughout the company and to ensure the Compliance Programme is implemented in the different functional and operational areas in close cooperation with our employees and management.

Company

This means any company within the ITP Aero group, including the parent company (Industria de Turbo Propulsores S.A.U.) and its wholly owned subsidiaries or any other company in which they have a controlling and/or majority shareholding.

ITP Aero

This means, as applicable, either the whole ITP Aero group or any Company thereof as defined above.

1 ITP Aero Speak Up Policy

1.1. Policy

1.1.1. All employees and stake holders are encouraged to raise ethical concerns or ask questions via one of our four main channels:

- a. your Line Manager
- b. a subject matter expert (for example, your local HHRR Manager, your Compliance Officer or the Export Control Team);
- c. your Local Ethics Adviser (LEA);
- d. the ITP Aero Ethics Line
- e. the Rolls-Royce Ethics Line

1.1.2. All concerns raised are taken seriously and ITP Aero is committed to ensuring that all matters raised are appropriately investigated, to the extent that this is possible. For concerns raised to your Compliance Officer, your Local Ethics Adviser or via the ITP Aero Ethics Line or Rolls-Royce Ethics Line, we aim to conclude all investigations within 60 calendar days.

1.1.3. It should not be necessary for you to raise your concern or ask a question by more than one or the channels set out in Section 1.1.1. In particular, these speak up channels are not a route of appeal if an employee is dissatisfied with the outcome from another process.

1.1.4. Retaliation against individuals who speak up about genuine concerns is not

accepted and should be reported by one of the methods outlined in Section 1.1.1.

1.2. Line Managers, Subject Matter Experts and Local Ethics Advisers

1.2.1. If an employee or stakeholder raises an ethical concern to you or asks a question, you should ensure that it is given priority and resolved in a timely manner.

1.2.2. If you are unsure how to deal with the concern or question, you should contact the Ethics & Compliance Team for further guidance.

1.2.3. The ITP Aero Ethics Line is a service, which allows employees and other stakeholders to raise ethical concerns or ask ethical questions confidentially and anonymously (if they wish).

1.2.4. The roll of the Ethics & Compliance Team is to have oversight of the concern and ensure it is investigated appropriately. The Ethics & Compliance Team will provide feedback to the reporter once the investigation has concluded.

1.3. ITP Aero Ethics Line

1.3.1 The ITP Aero Ethics Line is a service, which allows employees and other stakeholders to raise ethical concerns or ask ethical questions confidentially and anonymously (if they wish). You can access through the ITP Aero intranet ecm.itpaero.com or the website www.itpaero.com.

1.3.2 When a concern is raised to the ITP Aero Ethics Line in which it is necessary to enter personal data of any kind, ITP Aero undertakes to comply with the requirements of the legislation on Data Protection. We guarantee the utmost confidentiality to protect the persons involved and to avoid retaliation.

1.3.3. The roll of the Ethics & Compliance Team is to have oversight of the concern and ensure it is investigated appropriately. The Ethics & Compliance Team will provide feedback to the reporter once the investigation has concluded.

1.3.4 Due to the confidential nature of investigations, the reporter should not expect to receive detailed feedback on the findings.

1.3.5 There are robust controls in place to protect the privacy of individuals who use the ITP Aero Ethics Line. All our employees are required to handle any personal data, including that within Ethics Line reports, in line with the Data Privacy Policy and associated guidance.

1.4. Rolls-Royce Ethics Line

1.4.1. The Rolls-Royce Ethics Line is a service, which allows employees and other stakeholders to raise ethical concerns or ask ethical questions confidentially and

anonymously (if they wish) in their own language via the telephone or an online form <http://www.rolls-royce.com/ethicsline>.

1.4.2. The Rolls-Royce Ethics Line is managed by an external company to ensure anonymity and when a concern or question is received, it is sent to the Ethics & Compliance Team who will deal with it appropriately. The Ethics & Compliance Team does not have a team of investigators and so investigations are typically done by subject matter experts or independent managers supported by HHRR.

1.4.3. or those ITP Aero employees who are comfortable with the use of the Rolls-Royce Ethics Line, they must be careful not to include confidential information that compromises the industrial or intellectual property of third parties.

1.4.4 The role of the Ethics & Compliance Team is to have oversight of the concern and ensure it is investigated appropriately. The Ethics & Compliance Team will provide feedback to the reporter once the investigation has concluded.

1.4.5 Due to the confidential nature of investigations, the reporter should not expect to receive detailed feedback on the findings.

1.4.5 There are robust controls in place to protect the privacy of individuals who use the Rolls-Royce Ethics Line. All our employees are required to handle any personal data, including that within Ethics Line reports, in line with the Data Privacy Policy and associated guidance.

1.5. Communication of breaches

Any breach of this policy must be reported to the Ethics & Compliance Area, as well as any doubt that may arise from its application or interpretation, through mechanisms established in this "Speak-Up" Policy or through the Ethics Line.

the Ethics Line or other

In dealing with these situations, the identity of the reporters will be kept confidential and ITP Aero will not retaliate against them.

1.6 Disciplinary System

Non-compliance with this Policy by any employee of ITP Aero will be considered a misdemeanour and will be sanctioned in accordance with the Sanctioning Regime provided for in the applicable Collective Agreement, or in its absence, in the labour legislation in force, which may include the dismissal of the offender.

2 Where to get more information and other documents to read

Any communication related to this Policy, whether regarding additional information or non-compliance, may be made through the channels established in this Policy.

Other documents related to this Policy are:

- ITP Aero's Code of Conduct.
- The ABC Policies and guidance documents on the Ethics & Compliance site of ITP Aero's intranet.

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