



Code of Conduct for suppliers



Version 4 - September 2023

Code of Conduct for suppliers

Contents

Introduction	3
---------------------	----------

ITP Aero's principles	4
------------------------------	----------

1. Guarantee the fundamental rights of workers and respect for professionals	
2. Provide a safe and healthy workplace	
3. Guarantee the quality and safety of all products and services	
4. Environmentally responsible	
5. Respect import and export regulations	
6. Respect competition laws	
7. Comply with anti-bribery, anti-corruption and money laundering prevention measures	
8. Guarantee the accuracy and integrity of company records	
9. Avoid conflicts of interest	
10. Protect information and intellectual property	
11. Protect ITP Aero's brand and image	
12. Guarantee ethical behaviour in relationships with institutions	

Suppliers commitment	9
-----------------------------	----------

Introduction

ITP Aero is committed to the highest quality, safety and ethics standards with the aim of ensuring the success of its business.

Consequently, we ask our suppliers to accept and apply this Code of Conduct for suppliers, that contains the company's policies and principles included in its Code of Conduct, and that form part of the terms and conditions specified by the company in its contracts and purchase documents.

Companies of ITP Aero Group require that its suppliers comply with these principles. These apply to all those who offer products or services specified in ITP Aero's contracts and purchasing orders. In addition, ITP Aero also requires that these suppliers communicate this Code of Conduct to their own suppliers with the aim of guaranteeing compliance with these principles throughout the entire supply chain.

In the cases in which local laws and regulations impose stricter conditions to those observed in this Code, suppliers must adjust their behaviour to the first ones.

Questions and complaints channel

ITP Aero has an Ethics Hotline on its corporate website through which suppliers can ask questions regarding this Code of Conduct and report any behaviour that may have breached any of its principles.

www.itpaero.com



ITP Aero's Principles



“At ITP Aero we have always been committed to the highest standards of quality, safety and business ethics.”

ITP Aero's Principles

1. Guarantee the fundamental rights of workers and respect for professionals

What this means for ITP Aero suppliers:

- Respect the freedom of association.
- Reject any form of forced or compulsory labour and child labour.
- Promote an inclusive workplace, free of discrimination, in which each employee feels respected and valued regardless of his or her gender, age, race, religious beliefs, political ideology, sexual orientation or marital status.
- Encourage respectful treatment among employees and do not tolerate violent behaviour, physical, psychological or moral harassment, abuse of authority, or bullying or offensive behaviour.
- To comply with any applicable labour legislation.

2. Provide a safe and healthy workplace

What this means for ITP Aero suppliers:

- Guarantee a workplace that complies with health and safety regulations, promoting occupational health and safety management systems in accordance with regulations such as the OHSAS 18001 norm.
- Do not allow practices that endanger workers' safety.

3. Guarantee the quality and safety of all products and services

What this means for ITP Aero suppliers:

- Deliver and sell quality products that guarantee the health and safety of customers, users and professionals.
- Constantly work on improving products and processes.

ITP Aero's Principles

4. Environmentally responsible

What this means for ITP Aero suppliers:

- **Protect the environment by reducing the impact on the environment (reducing waste, emissions, energy consumption and the use of controlled materials).**
- **Promote Environmental Management Systems in accordance with regulations such as the ISO 14001 norm.**

5. Respect import and export regulations

What this means for ITP Aero suppliers:

- **Comply with international trade legislation and have all the relevant authorisations to import and export goods, services, technology and information.**
- **Consider all the applicable embargoes and sanctions related to the product, service or technology that the supplier provides. That includes to consider the sub-suppliers**
- **To certify both the export control classification in the applicable jurisdiction of the item to be supplied and to have any necessary export control authorisation in place, including supply to the final end-user.**

6. Respect competition laws

What this means for ITP Aero suppliers:

- **Strictly comply with the legislation governing competition (competition laws or antitrust laws) in all the areas in which they operate.**

ITP Aero's Principles

7. Comply with anti-bribery, anti-corruption and money laundering prevention measures

What this means for ITP Aero suppliers:

- Do not tolerate bribery or corruption in any form or irregular payments and/or receipts arising from illegal or criminal activities (money laundering or terrorist financing).
- Implement measures to comply with the applicable laws and regulations against corruption and bribery in the places in which they operate.
- Not to offer or accept any gifts or special attention that could influence business decisions or be considered as such.
- Not to make facilitating payments to expedite services or paperwork, or allow third parties to do so on our behalf.

We do not make any action or activity intended to help our customers, suppliers or any other party we work with, evade payment of taxes or pay less tax fraudulently or not at all.

8. Guarantee the accuracy and integrity of company records

What this means for ITP Aero suppliers:

- Guarantee the accuracy and truthfulness of all commercial, operational and financial records related to ITP Aero's business, showing commitment in the prevention and detection of fraud.
- Immediately notify ITP Aero of any errors that occur in operations and records related to ITP Aero's business.

9. Avoid conflicts of interest

What this means for ITP Aero suppliers:

- Inform ITP Aero about any kind of personal interest unrelated to the business that may influence actions or decisions made at work.

ITP Aero's Principles

10. Protect information and intellectual property

What this means for ITP Aero suppliers:

- Protect ITP Aero's confidential information and intellectual property, complying with policies and specific confidentiality agreements subscribed with ITP Aero.
- Not to obtain competitive intelligence by illegal means or methods that are unethical.

11. Protect ITP Aero's brand and image

What this means for ITP Aero suppliers:

- Not use ITP Aero's corporate image (name, logo, etc.) without prior consent from the company.
- Not to disseminate information related to ITP Aero or to any of its businesses to the media or make this information available to the public through social media.

12. Guarantee ethical behaviour in relationships with institutions and Public Administrations

What this means for ITP Aero suppliers:

- If the supplier is linked to institutional or political representatives due to activities related to the business, they must comply with the current local legislation and act with complete transparency, integrity and honesty in dealing with people of any institution or public administration, their agencies and representatives.

Suppliers commitment



“We ensure a fair, ethical and responsible behaviour in our relationships with our collaborators.”



Suppliers commitment

What this means for ITP Aero suppliers:

- **To give proper evidence and demonstrate, at reasonable request, that supplier conforms to all principles of the ITP Aero Code of Conduct for suppliers.**
- **To allow ITP Aero access to any supplier's documentation and/or site at any reasonable time in order to audit suppliers compliance with this Code.**
- **To, properly, communicate this Code and its principles to supplier's own supply chain and request them the compliance of such principles contractually.**
- **In case suppliers lack of its own Code of Conduct, or in case it is not in line with this Code, to communicate its employees this Code and its principles, in the supplier's business language.**

© Copyright - Industria de Turbo Propulsores S.A. (2023)

The information in this document is the property of Industria de Turbo Propulsores S.A. under copyright and with copyright permission to all the companies of ITP Aero group.