

# Speak Up Policy

*All companies operating under the name ITP Aero, are subject to compliance with the standards of behaviour indicated in this Policy, which is mandatory and applies to all its employees and workers. This Policy sets out the minimum standard of compliance, in the event that there are any applicable laws or regulations that impose different or stricter obligations, such laws or regulations shall apply upon this Policy*

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## Introduction

It is essential that all employees and stakeholders support the Ethics and Compliance Programme, and we encourage them to act as our first line of alert when they see unethical behaviour resulting from non-compliance with the Code of Conduct and Policies, as well as any applicable regulations or legislation. ITP Aero is committed to having an environment in which employees can raise concerns and make queries, in good faith, and without fear of retaliation, as required by the regulations in this regard.

This Policy is mandatory and applies to all members of the management bodies, senior management and employees of the ITP Aero group (referred to herein collectively as "ITP Aero" or "Company"). This Policy sets a minimum standard to be followed. Where local laws, regulations or rules impose a higher standard, that higher standard must be followed. Failure to comply with any of the policies of the Ethics and Compliance Programme (including, but not limited to, criminal, anti-bribery or anti-corruption compliance), including this Policy, as well as breaches of applicable laws and regulations, is considered a breach of employment obligations and may result in disciplinary action, up to and including termination of employment.

This Policy:

1. Provides a framework for the management and recording of concerns, queries or reports made by employees and stakeholders in relation to the Ethics and Compliance programme, including in relation to the anti-bribery and corruption management system, and the regulations or legislation that apply to the business.
2. Sets our standard for expected performance and behaviour in relation to the channels for communication of concerns, worries and reports that the company makes available to employees and stakeholders in the organisation.

### Your responsibility

Read, understand and comply with this Policy.

Raise any questions or concerns you may have. Information on how to do this can be found in this Policy.

### 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

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## Relevant terms

### Company

It refers, depending on the context, to the whole of ITP Aero or individually to any company in the ITP Aero group, including Industria de Turbo Propulsores S.A., the parent company Bain Propulsion Bidco, S.L. and their subsidiaries.

### ITP Aero

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

### Ethical concerns

These are communications or reports about problems or situations that require an individual or organisation to choose between alternatives that must be evaluated as ethical or not. These concerns, within any business relationship, may involve situations that contravene the ethical principles of the Code of Conduct, the Policies, applicable regulations or legislation that may have legal consequences for the Company.

### Ethical consultations

These are doubts or questions on various aspects of Ethics and Compliance, which do not constitute an ethical concern, as they are not an ongoing conduct or situation that breaches the ethical principles of the Code of Conduct, the Policies, as well as the applicable regulations or legislation.

### ITP Aero Ethics Line

An online tool where you can raise ethical concerns about ITP Aero's activities without fear of retaliation. You can also use it to raise ethical queries.

### Superior Direct

Superior to whom the employee reports.

### Compliance Officer

Employee responsible for ensuring that the Company complies with legal requirements and internal policies.

## **Export Control**

Set of laws, policies and regulations governing the export of sensitive materials and technologies.

## **Local Ethics Adviser (LEA)**

A person who will help the employee to find an answer to an ethical query, e.g. a doubt regarding how to act on a certain issue.

## **Specialist**

Expert in the areas covered by the Principles of the Code of Conduct such as, but not limited to, Human Resources, Quality, Health and Safety, Export Control, Environment, Legal, Data Privacy, Finance, Communication and/or Security.

## **Ethics and Compliance Programme**

Set of internal rules consisting of the Code of Conduct and other policies, procedures and instructions, as well as initiatives related to the above as, for example, training activities and / or awareness that regulate the conduct expected by ITP Aero with respect to all persons within the Company, as well as third parties such as suppliers, business partners and customers.

## **Ethics & Compliance Team**

The objective of this Team is to provide a strong structure throughout the Company and to ensure that the Ethics and Compliance Programme is implemented in the different functional, operational and business areas in close collaboration with our employees, LEAs and management. The team is responsible for appropriately handling concerns related to ITP Aero's business.

## **Stakeholders**

Any person or group of persons who have a relationship with the Company or whose interests may be affected in the course of the Company's activities.

## **Retaliation**

Any conduct, by act or omission that (1) is contrary to applicable law, or, (2) constitutes, directly or indirectly, unfavourable, prejudicial, discriminatory or degrading treatment whereby a person is placed at a disadvantage compared to another person because he or she has raised an ethical concern and/or consultation.

## 1 Ethical Concerns (Ethics Line)

1.1.1. All employees and stakeholders are encouraged to raise ethical concerns, and to report breaches of applicable laws and regulations or make ethical queries through the ITP Aero Ethics Line.<sup>1</sup> For more details on how to communicate through the Ethics Line, see section 1.3.

1.1.2. All concerns raised are taken into consideration and ITP Aero is committed to ensuring, as far as possible, that all are properly investigated. We aim to conclude all investigations as soon as possible and, in any event, within a period not exceeding three (3) months from receipt of the communication, except in particularly complex cases where this may be extended for a further three (3) months with due justification. It is important that all employees support our Ethics and Compliance programme, so if you witness any behaviour or situation that compromises the principles of the Code of Conduct, the Policies and/or applicable regulations or legislation, you have a duty to report it.

1.1.3. Retaliation against individuals who raise concerns is not tolerated under any circumstances, as described in detail in section 1.6, and must be reported through the Ethics Line. Retaliation is one of the most serious violations.

The presumption of innocence and the honour of the persons concerned as a result of the ethical concerns raised will also be respected.

### 1.2. Ethical consultations

1.2.1. If an employee or interested party wants to make an ethical consultation, as long as it is not an ethical concern, in addition to the Ethics Line, they can do so through the following channels made available by ITP Aero:

- a. your direct superior;
- b. a specialist, expert in the field (e.g. your HR manager, your Ethics & Compliance Officer);
- c. your Local Ethics Adviser (LEA) and;
- d. the Ethics & Compliance Team;

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<sup>1</sup> This communication channel constitutes the Internal Reporting System as foreseen in Law 2/2023 of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption (Spain).

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

### 1.3. ITP Aero Ethics Line

1.3.1. The ITP Aero Ethics Line is a service that allows ITP Aero employees and other stakeholders to raise concerns or make ethical enquiries confidentially and anonymously (if they wish) in their own language via an online form or if you prefer you can telephone on the number provided on the portal. You can log in:

- a. through the ITP Aero intranet [ecm.itpaero.com](http://ecm.itpaero.com);
- b. or from the website [www.itpaero.com](http://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 Data Protection legislation. We guarantee maximum confidentiality to protect the people involved and avoid retaliation. In both cases, ITP Aero acts as set out in section 1.5.

1.3.3. The role of ITP Aero's Ethics & Compliance Team is to monitor concerns and ensure that they are properly investigated. ITP Aero's Ethics & Compliance Team will acknowledge receipt within seven (7) days of receipt of the concern and provide its assessment to the complainant once the investigation has been completed.

1.3.4 Anyone who raises a concern through the Ethics Line can follow up on it through the portal, access to which is described in 1.3.1.

1.3.5 Strict controls are in place to protect the confidentiality and privacy of individuals using the ITP Aero Ethics Line. All our employees are required to handle personal data, including that contained in Ethics Line reports, in accordance with the Personal Data Protection Policy, as well as section 1.5 of this Policy.

1.3.6 ITP Aero has a register of complaints received and their processing, which complies with the related data protection provisions. This register shall only be accessible by the Ethics Line Manager, members of the ITP Aero Ethics & Compliance Team who operate the Ethics Line, the Human Resources department in the event of disciplinary action, as well as by legal counsel and by judges and courts in the context of legal proceedings.

1.3.7 The Ethics Line will be the preferred channel for reporting concerns. In the event of a perceived risk of retaliation for using the internal channel, the person communicating a concern may do so through various external reporting channels:

- European Union:  [<https://commission.europa.eu/about-european-commission/contact/problems-and-complaints\\_en>](https://commission.europa.eu/about-european-commission/contact/problems-and-complaints_en).

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- In Spain, through the Independent Authority for Whistleblower Protection.<sup>2</sup>
- In Spain and, if established, before the competent Autonomous Community Authority.

## 1.4 Communication of non-compliance

In the event of a breach of this policy, it must be reported through the Ethics Line. If you have any questions regarding the operation, application or interpretation of this policy, please contact the Ethics & Compliance Team.

## 1.5. Confidentiality and data protection

In dealing with these situations, the confidentiality of the identity of the complainants, of those under investigation and of any other persons or third parties concerned, as well as of the processing of the information and the investigation carried out, shall be guaranteed.

In this sense, the maximum period of conservation in the Ethics Line of the data related to the communications is three (3) months from the receipt of the communication without having initiated investigation actions or, where appropriate, from the time it was decided not to pursue investigation regarding the concern. That said, to demonstrate the functioning of the Ethics Line, ITP Aero may keep the information and data entered by this means, in an anonymous form.

In any case, personal data related to the communications and investigations included in the register referred to in section 1.3.6 shall be kept only for the period necessary, which in no case may exceed ten (10) years.

## 1.6. Prohibition of retaliation

ITP Aero prohibits retaliation against individuals who report Ethics and Compliance concerns made in good faith or a reasonable suspicion of non-compliance. This prohibition on retaliation includes threats of retaliation. Common examples of retaliation include:

- Unjustified dismissal or termination of the employment relationship.
- Refusal of holidays and/or leave.
- Negative job performance appraisals.
- Unfavourable or unfair treatment, including intimidation, ostracism or harassment.
- Impact on normal promotion processes.

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<sup>2</sup> At the time of writing, the Independent Authority for Whistleblower Protection has not been established.

- Unjustified termination of the business relationship.

Retaliation, including threats, against a person who reports ethical concerns in good faith will be treated as serious behaviour and will be subject to investigation.

## 1.7 Review and update

This Speak Up Policy is reviewed by the Ethics & Compliance Team periodically, every three years, and whenever organisational or internal changes occur in ITP Aero, as well as regulatory changes.

## 1.8 Disciplinary System

Failure to comply with this Policy by any employee of ITP Aero, shall be considered a misdemeanour, and shall be punished in accordance with the Penalty Regime provided in the Collective Bargaining Agreement of application, or failing that, in the labour legislation in force, which may include the dismissal of the offender.



## 2. Where to get more information and other documents you should read

Any communication related to this Policy, whether a concern or an ethical query, may be made through the channels set out in this Policy.

Other documents related to this Policy are

- The ITP Aero Code of Conduct.
- The ABC Policies and guidance documents on the Ethics & Compliance site on the ITP Aero intranet.
- Procedure P-0161 Ethics Line Management available in GMS.
- ITP Aero Data Privacy Policy

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