



# Code of conduct



# Code of conduct

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# Letter from the CEO of ITP Aero Group

As part of our on-going commitment to maintaining the highest standards in terms of quality, safety, compliance, and ethical practices, I am pleased to introduce you to our Company's code of conduct. This document outlines the principles and guidelines that govern our behaviour and interactions as members of this organization.

The context in which we operate is constantly changing, with increasing demands for higher levels of transparency. Considering this context, the new ITP Aero Code of Conduct is the backbone of our Ethics and Compliance Programme, which includes the policies, procedures, and whistleblowing reporting channels critical to sustaining the standard of compliance that we expect of ourselves.

Further, this document outlines the principles and guidelines that govern our behavior and interactions as members of this organization. Our Code of Conduct serves as a roadmap for how we conduct ourselves, both individually and collectively, within the company. It reflects our core values and the standards of behavior that we expect from all employees. By adhering to these principles, we can foster a work environment that is respectful, inclusive, and conducive to success.

I encourage each of you to take the time to familiarize yourselves with the Code of Conduct and to integrate its principles into your daily work. If you have any questions or concerns about the content of the document, please don't hesitate to reach out to your supervisor or through other channels available to you for clarification.

These values and principles apply to all of our interactions, at work and outside of work, with our employees, colleagues, customers, suppliers, partners, collaborators... and within our communities. Together, we can uphold all laws in the countries in which we operate and the highest standards of professionalism, integrity and respect, this is what it take to ensure that ITP Aero continues to thrive and succeed. Thank you for your attention to this important matter and thank you for your dedication to our shared values.

**Eva Azoulay**  
CEO of ITP Aero Group






# Our corporate values as a starting point

## High performance culture

### Our values

 <p><b>We operate with integrity</b></p>	 <p><b>We move towards excellence</b></p>	 <p><b>We care for our people</b></p>	 <p><b>We innovate for the future</b></p>
<p>Respect and honesty guide our actions.</p> <p>Our ethics inspire our trip to a better society.</p>	<p>We surpass the expectations as trusted partner.</p> <p>We are proactive and agile to fly higher.</p>	<p>We promote the right development environments for our people.</p> <p>We respect diversity and promote equality.</p>	<p>We lead the change to a more sustainable mobility.</p> <p>We develop the technology of the future.</p>

### Our behaviours

			
<b>Consistent</b>	<b>Agile</b>	<b>Team</b>	<b>Bold</b>

# Application of this Code of Conduct

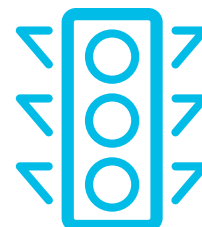
Everyone forming part of ITP Aero must behave with integrity, responsibility and honesty in our work. Our Code of Conduct will be used as a guide for us to achieve this.

This Code is a guide for action to ensure appropriate behaviour in our daily work and is applicable to everyone working in the company, regardless of our role, position, geographic location or company belonging to ITP Aero Group where we carry out our activity worldwide. We also require our employees, temporary or external workers from other companies working within the scope of ITP Aero to apply the principles of this Code of Conduct, with a specific code of conduct for Suppliers in line with this Code.

It is important that everyone working at ITP Aero understands the obligation to respect this Code and that we monitor compliance and act within the framework of its Policies and Procedures, especially those related to the area of Ethics&Compliance. Failure to comply with the established principles may result in disciplinary action.

## The Code and the Law

Company operations as well as personnel and workers are in any case subject to the laws and different jurisdictions applicable in each country around the world. All employees are expected to comply not only with this Code of Conduct but with all applicable governmental laws, rules and regulations at all times.



However, legal provisions can be very complex and vary from one territory to another, so if you have any doubts about the meaning or scope or consider that there may be a conflict between different laws applicable in different geographical areas, please consult with the company's Legal department.

# What is ITP Aero's role?

Create an environment that ensures the compliance with the ethical principles assumed by the organisation.

ITP Aero ensures the existence of an environment that favours compliance with ethical principles, where we can voice our concerns about business ethics, ensuring appropriate behaviour and respecting the established regulatory system, as well as the laws of each of the countries in which ITP Aero operates its activities, respecting the values of their respective cultures.

It is the company's responsibility to provide the training and time required for all personnel to be aware of the principles included in the Code of Conduct and to know how to act when faced with a dilemma.

Everyone working at ITP Aero has the right to work for a company that ensures compliance with ethical principles; consequently, if you have been subject to or have witnessed behaviour in the workplace that contravenes the principles of this Code of Conduct, or if there is doubt about legality, you must report it through the channels made available to you by the company, which you can access under guaranteed strictly confidential conditions always protecting your identity as an informant. (see **"What to do in the event of a breach of the Code"**).

## And if team management is included in your roles, you must in addition:

- Encourage and demonstrate exemplary professional ethical conduct within your team.
- Ensure that all members of your team have access to this Code, understand its content and receive training on the ethical principles contained therein.
- Ensure strict compliance with the Code among your team members and not encourage or give orders to achieve results to the detriment of ethical conduct.
- Create an open environment in which members of your team can raise ethical issues and answer all questions and concerns with the utmost care and attention. However, do not feel compelled to give an immediate answer. Ask for help if you need it.



# Your role as an ITP Aero worker

## Complying with the Code of Conduct: Your responsibility

Everyone working at ITP Aero must know and comply with this Code of Conduct.

- Take the time needed to read and understand all the principles and guidelines established in this document.
- Most importantly, make sure that you comply with this conduct in your daily activity.

**There will be times when you face a situation that is not included in this document and that leads to uncertainty from an ethical point of view.**



**In these cases, it is important to apply common sense:**

Ask yourself the following questions:

- Is this action ethical?
- Does it comply with applicable law or regulations?
- Would I like to see it displayed publicly?
- Would I feel confident and safe in the event of an inspection or if I had to explain in court?
- Would I feel ok if my family or friends knew about this behaviour?

**If the answer to any of these questions is “no”, don’t do it.**

If you hear phrases like those below and you have doubts, ask for advice or check with the Heads of Ethics:

- “Nobody will find out”
- “It doesn’t matter how we do it, as long as we do it”
- “It’s not right but everyone does it”
- “Don’t worry. This is how we do things here”
- “Do whatever you like, but I don’t want to know anything about it”



# What to do in the event of a breach of the Code

## We are all responsible for ensuring compliance with ITP Aero ethical guidelines.

If you observe behaviours that causes doubts or that you think may be violating our Code of Conduct, you must report it immediately. By doing so, you give the company the opportunity to address the problem and, if possible, resolve it before it risks our image, our reputation and our relationships with the environment.

You can do this in the manner that is most appropriate for you at the time:

- Your hardline manager
- The Specialists
- LEA (Local Ethics Advisers)
- Ethics & Compliance Team
- The Ethics Line accessible via the corporate website and the intranet

## Confidentiality

When you report a possible violation through the Ethics Line, anonymously or not, the company initiates an investigation during which maximum confidentiality is guaranteed for the details of: the process, the informant, the reported person, as well as any other information handled during the course of the investigation. All data will be protected in accordance with the privacy regulations in force in each country.

## Ethics & Compliance Function

At ITP Aero we have an Ethics & Compliance department in charge of ensuring impartiality and objectivity in the receipt and investigation of any ethical dilemma. Any matter will be treated confidentially. LEAs are employees who voluntarily help to promote the ethical culture at ITP Aero. They are a close channel for you to ask questions and raise concerns about ethical issues in an expeditious manner. They will indicate where to find information, who to contact and, if necessary, act as intermediaries

## Anti-Retaliation Policy

If you raise a situation where you believe the Code of Conduct is not being respected, you are expected to show cooperation and answer all questions with integrity and honesty. The company guarantees the utmost confidentiality of all information and ensures that there are no consequences for the informant. ITP Aero values the cooperation of its employees in identifying and solving problems. Reporting a concern or participating in a process regarding an ethical violation will not be the basis for an action that jeopardises the employment, professional status, compensation or development of the company's employees.

## False accusations

Intentionally making a false allegation, knowingly lying to those responsible for following up the complaint or refusing to cooperate with an ongoing investigation is a violation of the Code of Conduct, which may have disciplinary consequences. ITP Aero will protect anyone who raises a concern honestly by providing truthful information about a matter of concern, regardless of whether it is ultimately determined that there has indeed been a breach of the Code of Conduct.



**The company is committed to responding to all complaints**



# Our principles



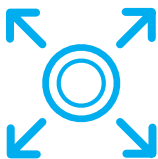
## 1. Our PEOPLE

- 1.1 We ensure basic rights for people working for ITP Aero
- 1.2 We encourage the development of our people
- 1.3 We offer a safe and healthy work space
- 1.4 We ensure privacy and confidentiality of personal information for ITP Aero workers
- 1.5 We encourage responsible use of company resources
- 1.6 We are open and honest with our people



## 2. Our BUSINESS

- 2.1 We ensure the quality and safety of all our products and services
- 2.2 We ensure the accuracy and integrity of company records and compliance with regulations and legislation applicable to our activity
- 2.3 We comply with import and export regulations
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- 2.7 We avoid conflicts of interest and handle them appropriately if they arise
- 2.8 We protect proprietary information and intellectual property



## 3. Our ENVIRONMENT

- 3.1 We maintain ethical conduct in our relationship with institutions
- 3.2 We are responsible regarding the environment
- 3.3 We are committed to our community
- 3.4 We protect our corporate identity and reputation

# Our principles



## 1. Our PEOPLE

*“Our credibility and therefore, the success of our company depend on our conduct.”*



# Our principles

## 1. Our PEOPLE

### 1.1 We ensure basic rights for people working for ITP Aero

- We respect freedom of association and the right to collective bargaining. Such as memberships and representation from Union organizations.
- ITP Aero maintains zero tolerance for all forms of fundamental rights violations, including modern slavery practices such as bonded labour, forced labour and child labour.
- We promote an inclusive workplace, free of discrimination, in which each person feels respected and valued regardless of gender, age, race, religious belief, political ideology, sexual orientation, health condition, disability, marital status and any other characteristic protected by current legislation
- We respect the reconciliation of family and work life.
- We treat all employees and candidates fairly under objective and impartial criteria according to their responsibility and professional skills.
- We encourage respectful treatment of people who work at ITP Aero and we do not tolerate violent behaviour, physical, psychological or moral harassment, abuse of authority or intimidating or offensive behaviour.

#### How does this affect you?

- You must treat all (ITP Aero employees and external people such as external staff, partners, customers, suppliers, or collaborators) in a fair and respectful manner.
- Do not tolerate abusive or offensive behaviour. If you observe this, you must report it.
- Do not exclude any person from a project, discussion or process due to gender, age, race, religious belief, sexual orientation or marital status.
- If you have responsibility as a leader in the development of people or in selection processes, you must make decisions based on objective and professional criteria (knowledge, skills and experience).
- If you have responsibility in team management you must respect a good work-life balance.

#### Application of the Code to our reality Examples

*I think that a person in our work team is being discriminated against because of their personal situation*

ITP Aero is committed to having a workplace free of discrimination, so you must report this situation to the company so it can be evaluated and resolved. You can directly contact your Hardline manager, your Local Ethics Adviser, the ITP Aero Heads of Ethics or go through the Ethics Line..

*My opinions during meetings are not taken into account and if I say what I think and my manager does not agree with me they retaliate. In light of this, I have chosen not to actively participate in meetings anymore and to just abide by what is the decisions made decided without objection.*

At ITP Aero we treat everyone equally and we encourage respectful behaviour. Your Hardline Manager should encourage all members of team to express their opinions without fear of reprisals, so if you don't feel this happening, contact the Ethics and Compliance team to help you find a solution..

#### What does respect for people mean?

Respect all people who work at ITP Aero regardless of their personal situation, avoiding harassment in any of its forms including:

- Verbal or physical attacks
- Abuse or any other form of bullying
- Discriminatory behaviour
- Degrading comments
- Email messages, jokes, images or text that cause mockery

# Our principles

## 1. Our PEOPLE

### 1.2 We encourage the development of employees

- We have a high-performance culture based on achieving great results in a sustainable way, in a healthy working environment.
- We recognize according to our people and team development process, aligned with our values and behaviours
- We promote frequent feedback between managers and employees to clarify priorities, track contribution and address the learning needs of each individual
- In line with our values, we strive to develop diverse and inclusive work environments that are free from discrimination so that all people have an equal opportunity to develop their own potential.

#### How does this affect you?

- Perform your job correctly by putting all your skills and knowledge into practice.
- You are at the center of your own development: You can proactively update your CV on the intranet and indicate your career expectations at any time throughout the year, as well as participating in your own learning pathway.
- Share your knowledge with others and adopt a proactive attitude. Make sure you get involved in take on responsibilities that you consider to be beneficial for your professional development
- Ask for support from your manager whenever you need it.
- If you have a team, you must ensure that your team members are adequately trained for their roles in the company.

#### Application of the Code to our reality Examples

*I am interested in applying for an internal position and I am unsure about telling my manager*

ITP Aero is committed to promoting the development of people by creating professional opportunities according to the needs of the company. Therefore, you can apply for vacancies that match your professional profile, and the recruitment process will be carried out in accordance with our recruitment policy.

As stated in the Recruitment policy, it's important that you involve and inform your manager when you are applying for an internal vacancy

#### What does professional development of employees mean?

The professional development of ITP Aero employees is underpinned by the following sub-processes: Recruitment and Onboarding, Learning, Performance, Talent Review and Salary Review process.

At ITP we promote development environments where people can learn by working in a stimulating and challenging environment. We also promote continuous feedback at all levels, mentoring and tutoring in early experiences or when there is a change of role.

# Our principles

## 1. Our PEOPLE

### 1.3 We offer a safe and healthy workplace

- We ensure a workplace that complies with health and safety regulations in working environments, as well as an environment that promotes the well-being of people in ITP Aero and their performance.
- We are committed to the highest standards of occupational health and safety. We have a Management System for the Prevention of Occupational Risks included in all work processes.
- We take care of the health of those who work at ITP Aero with preventive measures and care for people with health problems. In addition, we do not allow practices that endanger the safety of our personnel.
- We do not allow the consumption of controlled substances such as alcohol, tobacco and drugs at our facilities.

#### How does this affect you?

- Follow the rules and procedures set by the company regarding occupational health and safety to ensure your well-being and that of the people in ITP Aero.
- You should report any problems that may affect the health and safety of the people in ITP Aero.
- If you have any specific problem or need regarding health issues (mobility or respiratory problems, allergies etc.) you must inform the company.
- If you notice a risk to your health or well-being or you feel that the conditions are not safe, notify the person responsible.
- Do not take risks or expose others to risk at ITP Aero.
- Do not consume alcohol, tobacco or any kind of drugs at ITP Aero facilities and do not go to work under the influence of these.
- Attend work in appropriate cleanliness and hygiene conditions with the appropriate or regulation clothing, if applicable.

#### Application of the Code to our reality Examples

*My manager has asked me to do a job for which I have not received the training necessary to ensure safety standards and I have not received the information on the personal protective equipment that I should use.*

ITP Aero is committed to ensuring the health and safety of all the people in ITP Aero. Therefore, you must ask your Hardline Manager for all the information and training needed to avoid risks in performing your work. If your request is not met or you do not feel comfortable discussing the matter with your manager, go to the Heads of Ethics or the Ethics Line.

*I am pregnant and have doubts about the risks that I may be exposed to in my workplace.*

In case of doubt about any possibility of risk in your workplace, you must inform the company (through your Hardline manager, the Head of Human Resources or the medical service) so that your situation can be analysed and, in the event that any risk is confirmed a solution can be found.

#### What does workplace mean?

At ITP Aero, we consider the workplace includes any area in which people develop their work, from workstations in our facilities (offices and plants) to mobile work equipment,

# Our principles

## 1. Our PEOPLE

### 1.4 We ensure privacy and confidentiality of personal information for ITP Aero workers

- We respect the privacy of our workers and ensure compliance with legislation on personal data protection and respect the professional's right to privacy.
- We only compile and process the personal information necessary for the performance of our business and always respect current legislation on this matter.
- We ensure that ITP Aero's security systems (surveillance cameras, access controls, etc.) will not violate basic human rights.
- We do not interfere in the private conduct of those working at ITP Aero unless it impedes them in performing their job or adversely affects the company's reputation.

#### How does this affect you?

- Respect the privacy of other employees and protect the privacy of the personal data that you handle that are protected by the applicable regulations regarding privacy and data protection.
- Do not disseminate or provide access to personal information of workers (understood as any information that corresponds or can be associated with specific, identified or identifiable persons) to any person or entity outside the company, except when required or covered by a legal rule, judicial or administrative decision or required in procedures by public bodies, always following criteria of necessity and reasonableness.
- If you have doubts about how to handle personal information (according to the rules applicable to personal data and privacy) or how data protection legislation applies go to the Security Governance, Risk & Compliance Manager
- Avoid any behaviour within your private life that could interfere with the performance of your work or the reputation of ITP Aero.

#### Application of the Code to our reality Examples

*I have had access to the salary of several ITP Aero colleagues and I think I could use that information to improve my position in the company.*

Salaries are personal data that are protected by ITP Aero and everyone with access to salary information is obliged to guarantee the confidentiality of this information, in accordance with current data protection legislation. Under no circumstances are you authorised to disseminate or use this information. In addition, if you have had access to this data because of a fault or negligence, you must bring it to the attention of the company (through your hardline Manager or the Head of Human Resources) so that it can be resolved.

*A colleague has found photographs of another ITP Aero employee through social networks in a compromised position and has shared them at work with other colleagues.*

At ITP Aero, we protect the privacy of people and respect their right to privacy. Therefore, disseminating personal information regarding another ITP Aero worker is behaviour that we do not allow within the company. You should report the situation through your Hardline Manager, the Heads of Ethics or the Ethics Line so that they can stop to it and prevent its recurrence.

#### What information is considered "personal data" for the above purposes?

Personal data includes not only private data or data usually considered to be "strictly personal" (e.g. marital status, religion, political and trade union affiliation, salary information or medical information, etc.) but also "any individual information concerning an identified or identifiable person" in each case.

Therefore, with regard to persons working at ITP Aero, personal data includes, among others, for example, all data related to the professional profile ("curriculum vitae") including all contact information (telephone, email or postal address, etc.) and not only those of a private or personal nature in the strict sense, but also those related to ITP Aero and/or professional use (although in relation to the latter limited dissemination is specifically permitted in those



# Our principles

## 1. Our PEOPLE

### 1.5 We encourage responsible use of company resources

- We encourage responsible and adequate use of company resources (material, economic, technological or intellectual) limited to the workplace.
- The use of our information and communications systems available to workers must not be used to generate or transmit any offensive, obscene and inappropriate information.
- We control the use of company resources in order to ensure compliance with the aforementioned commitments.

#### How does this affect you?

- Use company resources responsibly and solely for the performance of your work, with care to contribute to maintenance avoiding that they become the object of theft or damages.
- Do not seek to obtain any benefit for yourself or another person from ITP Aero assets.
- Respect your working time and use it efficiently; do not participate in personal activities during working hours.
- Respect ITP Aero security systems to help control the proper use of resources.
- Do not use ITP Aero information or communication systems to disseminate confidential information or provide access to our information systems to third parties.
- ITP Aero may review each worker's use of Company resources.

#### Application of the Code to our reality Examples

*I have a corporate laptop that I occasionally use for personal matters such as downloading movies and other internet files.*

ITP Aero promotes the responsible use of company resources and downloading certain content from the internet can damage your computer and even affect the security of company information. Company computers must not be used to download movies or other files not related to your work at ITP Aero. If you have doubts about the use of corporate equipment, ask your Harline Manager or the Head of Systems for more information.

*The company provides me with personal protection equipment for the performance of my work that is useful for me to use in other personal tasks.*

The use of the personal protective equipment provided by ITP Aero is limited to the performance of your job, where you are subject to company-controlled health and safety conditions. You cannot use them for your personal tasks.

#### What is considered to be an ITP Aero resource?

- Company money
- Your working time and that of other professionals
- Confidential or proprietary information and data owned by ITP Aero (or its customers)
- Company products and employee work products
- ITP Aero communication and information systems
- ITP Aero technology, systems and software
- Workplace, equipment and furniture
- Buildings, facilities, machineries, materials...



# Our principles

## 1. Our PEOPLE

### 1.6 We are open and honest with our people

- We offer people who work at ITP Aero the information necessary for their professional development and to know and understand the ITP Aero strategy.
- We ensure transparency in communication with our workers, respecting the limits of corporate confidentiality.
- We encourage the communication and expression of our people in order to take into account and address their needs and opinions, making appropriate channels of communication for this available to them.
- We communicate our Strategic Plan to all company personnel.

#### How does this affect you?

- In the event that you consider that you are not properly informed on issues related to your job or that may be relevant to your development, you should request information from your Hardline Manager.
- If you are responsible for managing people, make sure that your team is properly informed on issues that may be of interest to them and encourage and promote dialogue so that communication flows correctly.

#### Application of the Code to our reality Examples

*As an ITP Aero worker, I would like to express my opinion on issues related to my performance or the company itself.*

At ITP Aero, we have different channels to encourage the communication and expression of those who work for the company: working environment surveys, the intranet and the employee portal, Ethics Line or team meetings. In addition to these channels provided by the company, you can discuss any issues that you consider relevant directly with your Hardline Manager or with the Heads of Ethics whenever you need to.

#### Tools that encourage transparency in communication with people:

- Working environment surveys
- Intranet and employee portal
- Compliance & Ethics
- Performance evaluation, development interview
- Team meetings
- Training
- Corporate publications
- Corporate events and conventions

# Our principles



## 2. Our **BUSINESS**

*“We are convinced that if we are responsible in relationships with our people and our environment we can ensure the success of our business.”*

# Our principles

## 2. Our BUSINESS

### 2.1 We ensure the quality and safety of all our products and services

- We are committed to developing and integrating a culture of quality and safety of products and services.
- We design, produce, deliver and sell quality products that guarantee the health and safety of customers, users and workers.
- We work permanently on improving our procedures and improving our products and processes.
- We implement continuous improvement tools in our management system aimed at guaranteeing maximum levels of quality and safety.

#### How does this affect you?

- Carry out your work responsibly and effectively. The quality of our products is achieved thanks to the quality of your work.
- You must follow the procedures established by the company to ensure the integrity of all our products and services.
- Remain alert to identify and communicate possible ways of improving our procedures and to detect any incident or problems that may affect quality and safety.

#### Application of the Code to our reality Examples

*My manager has assigned me a task that according to regulations requires qualifications that I do not have. What can I do?*

In order to ensure the maximum levels of quality and safety to which we are committed at ITP Aero, it is essential that the personnel involved in each process have the necessary qualification and certification. Therefore, you cannot do any work for which you are not qualified. You should discuss this issue with your Hardline Manager and Head of Quality.

*I have observed a material that is not compliant but my manager has told me to “turn a blind eye” in order to meet deliveries because the product’s non-conformity is minor and it is going to be concessioned.*

At ITP Aero, we ensure the quality and safety of all our products and services and therefore, we do not allow you to work with materials that do not meet the standards set. You cannot “turn a blind eye” to non-conformity of a material. You should must address it with your Hardline Manager and, in the event of conflict, contact directly with the Heads of Ethics,

#### Original Equipment



#### Services



# Our principles

## 2. Our BUSINESS

### 2.2 We ensure the accuracy and integrity of company records

- Our records, files and documents are valuable company assets and fundamental for the effective operation of ITP Aero. We work together to manage them properly and fulfil our obligations.
- We are committed to the accuracy and truthfulness of all the company's commercial, operational and financial records.
- We immediately notify our customers, suppliers and the authorities of any errors that may occur in our operations and records.
- We ensure that cash funds or other assets will not be established or maintained without being accounted for in ITP Aero books and records.
- We are committed to fraud prevention and detection.
- Transactions shall not be carried out for the purpose of tax evasion or distortion of accounting or financial information.
- In particular, all economic transactions must be clearly and accurately reflected in the corresponding records in accordance with current regulations, as well as all expenditure and income incurred.
- We develop our business activities in accordance with current legislation (including, but not limited to, tax and public aid and incentives) and promote a relationship of transparency and cooperation with all public management and control bodies in all relevant administrations, as well as with the legislation and regulatory bodies of other territories and jurisdictions in countries in which ITP Aero has a permanent establishment or where it develops activities that may be affected by the same.
- Only accept and raise invoices and other contractual documents which are true to our agreed commercial situation and which do not include false information.
- You must comply with applicable laws and regulations in all regulatory orders that apply within the scope of your work, as well as internal control rules and procedures set by the company.

#### Application of the Code to our reality Examples

*The head of my department has ordered not to invoice certain jobs to a client who he knows will not pay in order to not increase the portfolio of debtors from his area and achieve objectives.*

ITP Aero ensures that all relationships with customers and suppliers are reflected in the company records with accuracy and truthfulness. The conduct of your Head goes against this principle and also subordinates the interests of the company to their personal interests. You must report the situation to the Heads of Ethics or the Ethics Line.

*I am working on a project and my manager has asked me to allocate the hours to another project because we already have a deviation in hours dedicated to the former.*

You must fill in timesheets exactly and you can not falsify them even if your manager requests it. In the event of conflict with your Hardline Manager for not following their guidelines you can contact the Head of Ethics or Ethics Line.

#### How does this affect you?

- You are responsible for the proper use and management of company records, files and documents. This applies to all persons working at ITP Aero who at any point may receive, process, transfer, use, retain or eliminate them.
- Make sure that all records created or monitored are accurate and truthful.
- Do not modify any data collected in a record without the appropriate authorisation.
- If you notice any error, notify the person responsible.

#### What is considered to be a company record?

- Records of assets, liabilities, revenue, expenditure and commercial transactions
- Budget proposals
- Business Plans
- Economic assessments
- Quality reports
- KPIs and efficiency indicators
- Allocations to work
- Legal agreements
- Inventory records



# Our principles

## 2. Our BUSINESS

### 2.3 We comply with export regulations and import obligations

- As a global company, we comply with international trade laws and we have the appropriate authorisation to import and export goods, services, technology and information.
- We observe and comply with all national and international sanctions and embargoes when establishing trade relations.

#### How does this affect you?

- Export control regulations and import obligations have implications in all areas, including: international trade, sales, engineering, purchasing, operations, IT systems, human resources, financial and legal.
- Export control affects not only material or physical operations, but also intangible imports / exports, such as those carried out by electronic means, including activities carried out within our borders.
- If you are involved in the movement of goods, services, data, software or technology (including in your hand luggage), you must make sure you understand and comply with the regulations and legislation governing these matters in all the countries involved in the process.
- Do not travel with a laptop or any other device with controlled information or technology without the relevant authorisation.
- Do not make movements of materials outside the country without taking into account the customs regulations.
- We must ensure that all duties, taxes and fiscal obligations, as well as the conditions of all authorisations granted are complied with, and that all customs export and import declarations are correctly carried out.
- When there is any doubt regarding legislation or regulation that may have implications for Export Control, you should always contact a member of the Export Control teams in your area (ECPOCs), or the Export Control area or the International Trade manager directly.
- When there is any doubt regarding customs implications, you should always contact [custom@itpaero.com](mailto:custom@itpaero.com) or the International Trade manager directly.

In case of doubt about export control, you should contact [exportcontrol@itpaero.com](mailto:exportcontrol@itpaero.com)

#### Application of the Code to our reality Examples

*In order to achieve my sales targets, I have the option to sell materials and services through an intermediary, without considering the end customer.*

ITP Aero is committed to encouraging all our partners and suppliers to behave with integrity and act in line with our ethical principles. Therefore, you cannot sell materials through an intermediary company if it does not provide guarantees that applicable legislation and our own policy will be complied with throughout the entire process, including the final destination.

Failure to comply with Export Control regulations and uncontrolled exports can lead to risks to our reputation, financial or trading losses, and even encourage human rights violations and criminal consequences\*.

*When it comes to making an offer or changing an operative, should I consider the customs implications?*

Yes, otherwise we may be in breach of the mandatory customs requirements. Among other things, the consequences of such non-compliance may result in increased financial costs, a slowdown in the supply chain, the loss of customers and of any benefits granted by Customs Authorities such as Authorised Economic Operator status (OAS).

#### What does the import and export regulation govern?

Governments and international organisations control the movement of certain tangible (material) or intangible (technology, data, and services) goods, in order to ensure maximum safety in the field of international trade. These controls may apply to imports, exports, financial operations, investments and other commercial transactions as well as to the transit of people.

Some countries also prohibit or control the re-export of goods once they have left their original destination. As a result, governments apply sanctions against certain countries, entities or individuals and establish trade embargoes.

The Customs Authorities of some countries or unions of countries establish the rules, procedures and general conditions that regulate and apply to the goods that are brought into or leave their territory.

# Our principles

## 2. Our BUSINESS

### 2.4 We comply with competition laws

- We strictly comply with competition law (competition laws or applicable antitrust laws) in all areas in which we operate.
- We practice free and fair competition and make sure that we do not enter agreements to manipulate markets, set prices or other conditions, engage in unfair competition, distribute customers or territories, harm certain suppliers or even limit production.
- We bid for contracts in a fair and independent manner.

#### How does this affect you?

- Do not share ITP Aero practices or sensitive information with competitors, including information on prices, offers, market shares, sale conditions, costs or profit margins.
- Present company products in an honest and truthful manner.
- Report any suspicion or sign of anti-competitive conduct to our Legal Department and go to this Department whenever you have any doubts about how to proceed or need advice.

#### Application of the Code to our reality Examples

*A competitor has proposed to fix prices and determine who wins each bid with the Public Administration.*

At ITP Aero we always observe and comply with current regulations regarding public procurement and we do not fix prices with competitors.

#### Some aspects regulated by competition law:

- Communication or agreements between competitors, particularly related to prices or conditions of sale.
- State aids.
- Participation in an industry association or in a standard setting body.
- Mergers and acquisitions, as well as joint ventures or other types of partnerships.
- Boycotts and territory, products or customer allocations.
- Exclusivity agreements.
- Restrictions on trade or associative pricing agreements with suppliers or customers.

# Our principles

## 2. Our BUSINESS

### 2.5 We comply with measures against bribery, corruption and prevention of money laundering

- We do not tolerate bribery or corruption in any form or the collection of irregular charges and/or payments from illicit or criminal activities (money laundering).
- We are committed to the laws and regulations in force against corruption in those places in which ITP Aero operates.
- We do not offer or accept any gift or special attention of value that could influence business decisions or be considered as such.
- We do not make 'facilitation payments' to expedite services or procedures and do not allow third parties to do so to our advantage.
- We are committed to complying with all applicable anti-money-laundering and anti-terrorist financing laws, and we only accept funds received from legitimate sources.
- We do not contribute to or facilitate tax evasion by our suppliers, customers, and other third parties.

#### How does this affect you?

- Do not make any payment or offer special attention to (current or potential) customers, suppliers, partners or governmental entities with the intention of obtaining or retaining business or obtaining favourable treatment.
- All employees must follow the established policies in place for dealing with third parties.
- Do not accept payments, gifts or special attention from third parties that are made with the intention of influencing ITP Aero's business decisions and do not comply with established regulations. In the event of receiving a gift that is not considered appropriate for return, the Heads of Ethics must be notified.
- Confirm that all donations and sponsorships are duly validated by the company.
- Comply with established processes for selecting suppliers, third parties and contracting customers.
- Do not undertake any action that may affect the company in tax evasion matters, nor facilitate third parties with the necessary mechanisms to avoid taxes.

#### Application of the Code to our reality Examples

*A potential ITP Aero supplier has sent me a gift of value to secure the allocation of a contract.*

At ITP Aero we do not tolerate any form of bribery or corruption. You cannot accept the gift that the candidate company provides with the intention of influencing your decision and make you favourably disposed towards it. You must inform the provider of our Code of Conduct and report the case to the Heads of Ethics or the Ethics Line.

*An intermediary agent hired through ITP Aero to obtain institutional business in Asian countries has requested a considerable increase in the fees for their services, which makes me suspect that some of that money may be used to bribe local officials.*

ITP Aero is committed to encouraging our employees or suppliers to behave with integrity and act in line with our ethical principles. Therefore, we cannot accept that one of our intermediaries is involved in bribery on behalf of the company. You should notify your Hardline Manager, the Heads of Ethics about the situation or go through the Ethics Line.

#### Definition of corruption

Corruption is the misuse of the power entrusted to obtain private benefits (including both financial gain as well as other types of advantages).

#### Definition of bribery

Anything of value, including financial guarantees and other benefits that may be given, offered, required or received in order to influence any action, omission or decision by any person, including public officials or any director, employee, agent or representative of any private organisation or individual.

#### Money laundering

Mechanisms or procedures focused on making the proceeds of crime appear legitimate or legal.

#### Facilitating payments

A facilitating payment is a non-standard and unpublished payment made to facilitate or expedite decisions or actions by government agencies or officials. If these payments belong to a legally-mandated official or regular service or are required in certain circumstances under threat, they are not considered as facilitating payments.



# Our principles

## 2. Our BUSINESS

### 2.6 We ensure ethical behaviour in our relationships with shareholders, customers, partners, suppliers and collaborators

- We ensure fair, ethical and responsible conduct in relationships with shareholders, customers, partners, suppliers and collaborators.
- We select our partners and suppliers with objective business criteria (price competition, quality, delivery etc.) based on the benefit to the company and we take into account whether their values and commitments are aligned with our ethical principles.
- We encourage our partners and suppliers to assume and apply ITP Aero policies in terms of legislation, regarding human rights, occupational health, sustainability and product and service safety, as well as the principles of our Code of Conduct.
- In the event that we have collaborators not on our workforce (such as subcontracted personnel, third parties, advisors, consultants or distributors) we ensure their integrity and that their conduct complies with our ethical principles.

#### How does this affect you?

- Maintain a relationship with customers, partners, shareholders, suppliers, providers and collaborators based on transparency and communication, without disseminating confidential information or personal data and protecting the intellectual property of ITP Aero or our customers.
- Ensure that all communications with stakeholders, including contracts, proposals and grant documentation are rigorous and accurate.
- Follow the contracting processes of suppliers, third parties and collaborators and ensure they are chosen based on objective and professional criteria.
- In the event of inappropriate conduct by one of our suppliers, partners or collaborators, you must notify your manager.

#### Application of the Code to our reality Examples

*I urgently need to hire a collaborator and complying with the action protocols set by the company will delay the paperwork and could negatively affect the business.*

At ITP Aero, we encourage our suppliers and collaborators to comply with our ethical principles so that their contracting is subject to a series of procedures that must be fulfilled. You cannot use an unauthorised collaborator or one who has not signed a valid contract and you must ensure that this collaborator does not act on behalf of ITP Aero without such authorisation.

*My brother has a company that could work well as an ITP Aero supplier and I would like to promote him as a candidate without conflicting with the company Code of Conduct.*

At ITP Aero, we ensure that the selection of suppliers is made using objective criteria based on company's business interests. Therefore, provided that you do not take part in or influence the decision on contracting suppliers and you correctly inform ITP Aero of the situation and the existing link, your brother's company can apply as a candidate.

#### What defines a relationship with shareholders, customers, partners, suppliers and collaborators?

The guarantee of ethical conduct in our relationships with shareholders, customers, partners, suppliers, collaborators and administrations is not limited to commercial or contractual relationships but includes any kind of professional contact with them, from informal meetings, proposal presentations, negotiations or selection processes.

# Our principles

## 2. Our BUSINESS

### 2.7 We avoid conflicts of interest and handle them appropriately if they arise

- We ensure that any company decision is made taking business interests into account over personal interests.
- We avoid any kind of financial, commercial or personal relationship that may influence our independence.
- We ensure the absence of special interests in our actions and decisions at work.

#### How does this affect you?

- Make the most appropriate decisions for the company taking into account the following aspects:
  - Compliance with legislation, regulations and internal policies
  - Absence of special interests
  - Pre-analysis of all relevant information
  - Acting in good faith, honestly and ethically
  - Acting with the discretion required by the situation
- Avoid any type of professional or personal relationship that could influence your independence when it comes to making decisions and inform the company if you detect any possibility of conflict or disparity of interests.
- Avoid conflicts of interest that may lead to discriminatory situations. In this sense, you are not allowed to work with relatives on whom you are dependent or people with whom you maintain a close relationship (up to second degree relative).
- Do not do business with a company that is owned or controlled by someone who works at ITP Aero or a family member thereof unless authorised to do so.
- Have no involvement or interests in a company which could be a customer, supplier or competitor of ITP Aero, unless you have the authorisation to do so.
- If you have access to insider or sensitive investment information that may be used in the securities field, you should not disclose it to any other person or recommend, encourage or persuade anyone to trade or conduct transactions on the basis of such information.

#### Application of the Code to our reality Examples

*I have the decision-making capacity in the selection of a new supplier for the company and one of the candidates is a company owned by a family member, in addition, I consider as the best option based on ITP Aero's interests.*

In order to avoid a conflict of interest, you must inform the company of the existing link with the candidate company and refrain from participating in the selection process because your involvement with this company may be perceived as you acting in favour of your personal interests and not those of ITP Aero.

*My son has just finished his studies and I would like to select him for a job at ITP Aero for which he meets the profile.*

Your son may put himself forward as a candidate provided that you do not participate in the selection process and that you do not have any decision-making capacity or influence over the process. Additionally, the position applied for cannot be in the same reporting line as yours.

#### What is a conflict of interest?

A conflict of interest is any relationship (whether personal or professional), influence or activity that may appear to adversely affect an employee's ability to make fair and objective decisions in the performance of his or her duties or act in the company's best interests.

#### How do I identify a conflict of interest?

To help you identify a potential conflict of interest, consider the following:

- Could my personal interests interfere with those of ITP Aero?
- Could it seem that my personal interests interfere with

# Our principles

## 2. Our BUSINESS

### 2.8 We protect proprietary information and intellectual property

- We consider information to be a very valuable asset, especially protecting ITP Aero's proprietary information and any other information disclosed to us by our customers, partners or suppliers.
- We encourage the signing of confidentiality agreements with third parties to which ITP Aero will disclose information or from which ITP Aero will receive information.
- We do not obtain competitive intelligence by illegal or unethical means or methods.
- We have an Information Security Management System (ISMS) to safeguard the integrity, availability and confidentiality of the information we handle.
- We recognise the intellectual property value of patents, designs, trademarks and trade secrets.
- We support R&D&I efforts by protecting the associated intellectual property rights, where applicable.
- We maintain a documentation control system classified by defence entities (NATO, CE, MoD).

#### How does this affect you?

- You should not disclose or use information related to ITP Aero activity without authorisation, both inside and outside the workplace. You should not even disclose it to family and friends.
- The use of the information must be only under the terms permitted according to the requirements established in the ITP Aero Information Security Management System and respecting the provisions in confidentiality agreements signed by ITP Aero.
- You must strictly observe the rules for access and disclosure of any confidential matter or piece of information, inside or outside the company, to people who are not authorised avoiding to involve any know such certain information.
- Do not attempt to have access classified material without authorisation or when your access is not necessary for legitimate business objectives and do not provide such access to third parties.

#### Application of the Code to our reality Examples

*I am working on a project where I handle classified information and I have signed a confidentiality agreement (NDA) with the client. One of my colleagues who is not involved in the project has asked me to provide information of interest to another client.*

To protect information and intellectual property at ITP Aero we encourage the signing of confidentiality agreements. If you handle classified information and have signed a confidentiality agreement you cannot share that information, not even internally within the company. In addition, we work with clients that may compete with each other and for that reason we are stricter with our internal protocols on the protection of information and intellectual property.

*I would like to upload information about projects on which I have worked at ITP Aero to promote my profile on social networks.*

The information on projects developed at ITP Aero is confidential company information that you are not authorised to share through social networks or other public channels, not even in personal conversations or meetings. In the event of any doubt about what information you can share, contact to the Communications Department.

#### What is considered ITP Aero confidential information?

Any non-public information that must not be disclosed to third parties because it may compromise confidentiality agreements, or may affect, for example, strategic operations, providing competitive advantages or that could harm ITP Aero or third parties if it is known in an unauthorised, inappropriate or premature manner.

#### Examples:

- Technical or technological know-how, knowledge of systems, projects, processes, etc. acquired and developed at ITP Aero or received by third parties under confidentiality obligations.
- Financial information regarding customer, suppliers and partners.
- Information available to us from customers under confidentiality agreements (NDAs)
- Worker's personal details, salary and health information.



### 3. Our ENVIRONMENT

*“In light of a changing environment, in which society’s demand for integrity and transparency is constantly increasing, we have decided to review our Code of Conduct”*

# Our principles

## 3. Our ENVIRONMENT

### 3.1 We maintain ethical behavior in our relationship with institutions

- *Our business is related to institutions in several processes and environments; our ethical and professional behavior is a guarantee of continuity.*
- *Our business has no preference, affiliation or connection whatsoever with any political party.*
- *We do not make contributions or donations to political parties or organisations, academic institutions or to any group linked to a political party or cause.*

#### How does this affect you?

- *If you are dealing with institutional or political representatives for the benefit of the company, you must comply with the company legislation and regulations and act with total transparency, integrity and honesty in dealing with government leaders, their agencies and representatives.*
- *You must not take part in the political process or link yourself to a party as an ITP Aero employee, except on a personal level, outside the company and its resources and in your own time.*

#### Application of the Code to our reality Examples

*I have a friend who is a candidate for political office and I would like to collaborate in his campaign.*

At ITP Aero we have no preference or collaboration with any political party. You may collaborate in a personal capacity with your friend's campaign as long as you do not link the ITP Aero name to your political activity and this does not affect your dedication or company resources.

*A member of the Army with which we have a commercial relationship has asked ITP Aero to make a donation or sponsorship.*

You must transfer the request to the Communications Department so that it can assess whether the cause is aligned with company policy.

#### Who do we consider to be institutional representatives?

- Employees of any government or governmental entity.
- Members elected in different forums (Congress, convention, provincial councils, local corporations, etc.).
- Political parties and their party officials
- Candidates for political office
- Employees of local, autonomous, national and international public organisations

# Our principles

## 3. Our ENVIRONMENT

### 3.2 We are responsible regarding the environment and we act against climate change

- We want to lead the decarbonisation of aero engines by committing to product innovation towards more sustainable mobility. Carbon neutrality is a common challenge for all of us in the aeronautical sector, and to this end, we are committed to becoming carbon neutral by 2050 in line with the UN's "Race to Zero" programme and to curbing the consequences of climate change.
- We focus on reducing our impact on the environment through an environmental culture applied to our organisation, processes and products.
- To carry out this work, we have an environmental management system based on the continuous improvement cycle: Planning, Support and Operation, Performance Evaluation, Improvement, in accordance with the ISO 14001 and EMAS standards.
- The cornerstone of this management system is our environmental policy, through which we strive to be recognised for environmental excellence in all our activities, products and services. We assume this responsibility to prevent and minimise environmental impact in what we consider to be critical elements: resource consumption: energy, water, chemical products, climate change, atmospheric pollution, waste generation and biodiversity.
- We do all this with full responsibility, based on a culture of compliance with current regulations that permeates all our activities

#### How does this affect you?

- You should know the company policy on environment and climate change area in order to behave in line with it. You should try to minimise the environmental impact in your day-to-day work, for example in the use of resources and energy. If you notice a risk to the environment, inform your manager or the person responsible for these areas.

#### Application of the Code to our reality Examples

*I would like to learn about the environmental regulations that we need to comply with at ITP Aero.*

You can consult the company policy on environmental matters through internal communication channels such as the intranet and the employees portal or by directly transferring the query to the Heads of Quality and Environment.

#### How do we protect the environment at ITP Aero?

At ITP Aero we work to ensure sustainable development and minimise our impact on the environment through the following measures:

- Sustainable product design
- Waste reduction
- Reduction of resource consumption
- Prevention of pollution
- Reduction of atmospheric emissions
- Recycling and water management

# Our principles

## 3. Our ENVIRONMENT

### 3.3 We are committed to our community

- We seek to contribute to the economic development and social welfare of the communities in which we operate.
- We support and invest in the community, with special attention to the geographic areas in which we are operate.
- We respect the specific legislation and regulations of each country and region in which we operate as well as their local customs and cultures.
- We respect our communities as a whole, promoting communities free of discrimination and hatred, complying with the laws and regulations in force in our communities

### Application of the Code to our reality Examples

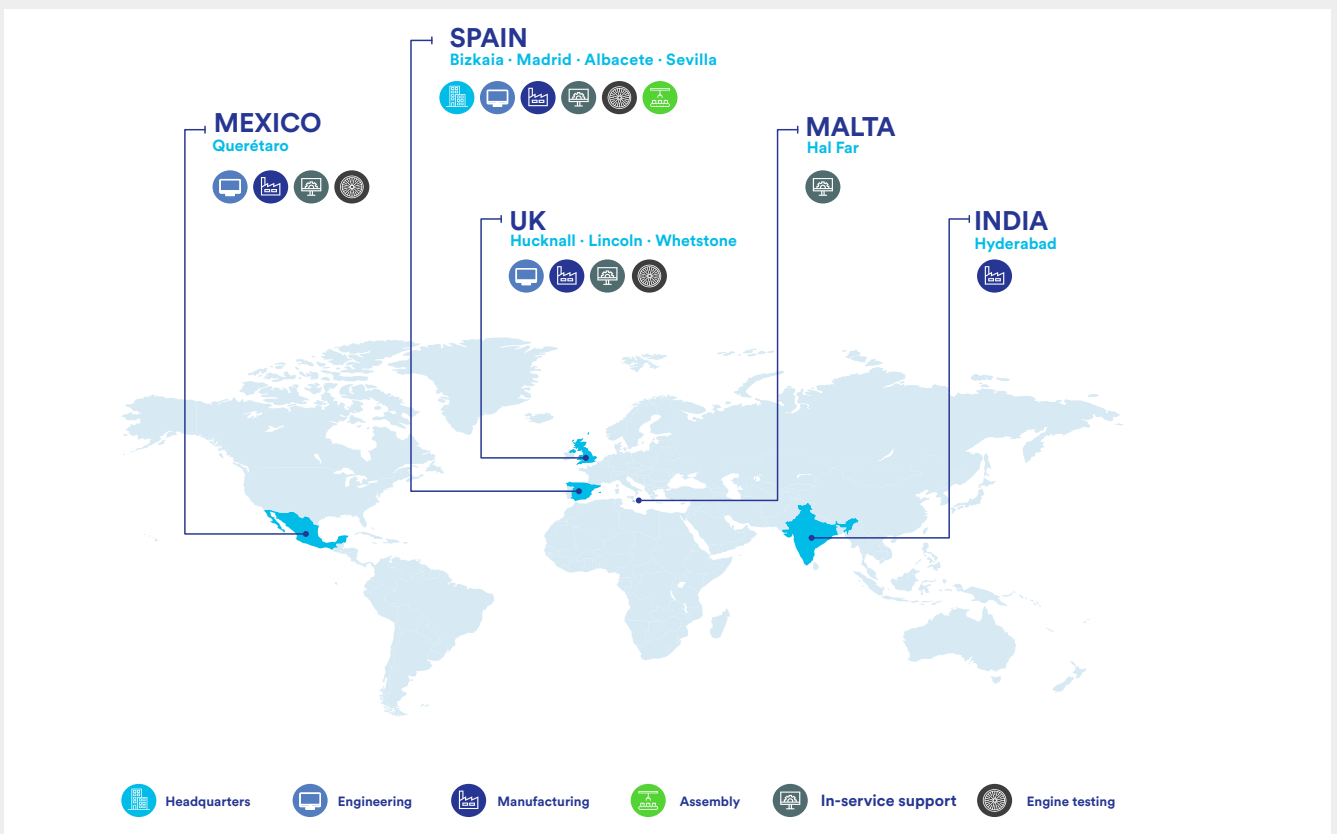
*A local university has asked me to take part in a seminar as a speaker on aspects related to my professional experience at ITP Aero.*

At ITP Aero we promote initiatives for the benefit of our community such as collaboration with a university. You should notify your hardline manager in order to assess what aspects of your experience could be covered in this session without disseminating confidential information or affecting the intellectual property of ITP Aero or third parties.

### How does this affect you?

You must transfer any request for support or sponsorship you receive to the Communications Department

### What communities do we operate in?





# Our principles

## 3. Our ENVIRONMENT

### 3.4 We protect our corporate identity and reputation

- We protect our corporate identity and reputation and actively defend the interest of ITP Aero globally.
- We contribute to the media understanding our business and we ensure that the information we disseminate is not misinterpreted is not misunderstood or manipulated.
- We control our presence in the digital world in order to strengthen our image and reputation and does not detract from it.
- We have a Corporate Identity Manual that sets the use and application of the basic elements that define the ITP Aero image.

#### How does this affect you?

- As a person professionally linked to ITP Aero, your behaviour and comments about the company should protect ITP Aero's image and reputation, both inside and outside the work environment.
- The use of the ITP Aero logo or name must not be allowed at demonstrations, political events or other events that are not related to the company.
- You must not talk to the media about issues related to our business without prior authorisation. In the event that you receive any request from a journalist or media, you must transfer it to the Communications Department.
- Regarding the use of social networks:
  - You should not use social networks to disseminate information related to the company or its customers (except authorised corporate information) or refer to it with inappropriate content or tone (vulgar, obscene, intimidating, threatening, etc.).
  - If you identify yourself as an ITP Aero worker in your personal social network profiles you need to clarify that the opinions that you give in the digital world are your own and not corporate opinions.

#### Application of the Code to our reality Examples

*I have received a call from a journalist who is asking for information on the company for an article they're writing.*

At ITP Aero, we have a Communication Department which is responsible for relationships with the media to ensure that the information disseminated reflects the identity of ITP Aero and is not misleading. Any call, email or request from a journalist should be passed on to this department, which will be responsible for dealing with it.

*I have been asked to give a speech and I would like to use examples of projects developed by ITP Aero to enhance the company's image.*

You need to get authorisation from your Hardline Manager and inform the ITP Aero Communication Department about the details of the activity. The Communication Department will guide you so the content of your talk is aligned with ITP Aero's corporate identity and reputation, without divulging any confidential company information.

#### What is the corporate reputation?

Corporate reputation is the set of perceptions main stakeholders have about a company and is a result of its corporate behaviour over time as well as its ability to add value to these groups.

#### What about corporate identity?

Corporate identity is all the elements that define the personality of a company and includes visual and graphic elements such as logo and typography, among others.

# Contacts

For further information, you can visit the “Ethics & Compliance” area of both the intranet and the corporate website, where you will find documentation on ITP Aero policies that develop the ethical principles of this Code of Conduct.

If you have any questions related to this Code of Conduct you can contact the LEAS or the Ethics and Compliance Team.

To contact the Ethics & Compliance Officers of each organisation, please contact:

[ethicsandcompliance@itpaero.com](mailto:ethicsandcompliance@itpaero.com)

If you want to report any behaviour that contravenes or is in breach of this Code of Conduct you can do so via the Ethics Line accessible through the corporate website and the intranet.