



SUPPLIER CODE OF CONDUCT

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INTRODUCTION

The ITP Aero Group is committed to the highest standards of quality, safety and business ethics to ensure the long-term success of its business.

To this end, we expect our suppliers to uphold these same standards. For this purpose, it has created this Supplier Code of Conduct, which outlines the principles and values of the ITP Aero Group.

This Supplier Code of Conduct is part of the terms and conditions specified by the ITP Aero Group in its contracts and purchasing documents.

This Supplier Code of Conduct applies to all third parties that supply products or services to the ITP Aero Group. Suppliers are also responsible for promoting and ensuring compliance with these principles, values and ethical standards throughout their supply chain.

Where local laws and regulations impose stricter requirements than those of this Code of Conduct, suppliers must comply with the stricter standards.



SUPPLIER COMMITMENT

- **Comply with all applicable laws and regulations**, including those relating to labor, environmental protection, health and safety, and business conduct.
- **Demonstrate, and upon request, provide ITP Aero Group with appropriate evidence** of compliance with all principles outlined in the ITP Aero Group Supplier Code of Conduct.
- **Provide reasonable access to information and documentation** requested by ITP Aero Group to verify compliance with this Code.
- **Allow ITP Aero Group reasonable access to their facilities** at any time for the purpose of auditing compliance with this Code.
- **Communicate the principles of this Code to their own supply chain** and ensure, through contractual means, that their suppliers also comply with these principles.
- **In cases where the supplier does not have its own Code of Conduct**, or where it is not aligned with this Code, the supplier must communicate this Code and its principles to its employees.

CHANNEL FOR INQUIRIES AND ALLEGATIONS

The ITP Aero Group has an Ethics Line on its corporate website, through which suppliers can ask questions related to this Code and report any conduct that may have infringed applicable laws or the principles of this Code.

 [ITP Aero Ethics Line](#)

ITP AERO GROUP PRINCIPLES

1. Guarantee human rights and respect for individuals

- Promote and respect the human rights of all individuals, without distinction based on race, gender, sexual orientation, religion, nationality, age, political ideology, marital status, or any other condition.
- Ensure an inclusive, respectful, dignified, and discrimination-free workplace where every worker feels valued.
- Guarantee social dialogue freedom of association, collective bargaining, and the right to strike.
- Ensure fair working conditions in terms of working hours, salary, and benefits, as well as appropriate physical and mental demands according to the job position.
- Foster respectful treatment among employees, and do not tolerate violent behavior, physical, psychological, or moral harassment, abuse of authority, or intimidating or offensive conduct.
- Reject any form of forced or coerced labor, as well as child labor.

2. Provide a safe and healthy workspace

- Ensure the protection and safety of all individuals by complying with applicable health, safety, and protection regulations. Promote occupational health and safety management systems equivalent to the requirements of ISO 45001.
- Prohibit any practices that endanger the safety of workers.

3. Guarantee the quality and safety of products and services

- Deliver quality products and services that safeguard the health and safety of customers, users, and professionals.
- Continuously work to improve and enhance products and services.

4. Protect the environment and act against climate change

- Protect the environment by reducing the environmental impact on the surroundings (including waste reduction, pollution prevention, water use, emissions, energy consumption, and the use of controlled materials).
- Implement effective preventive measures to minimize environmental impact, including the adoption of clean technologies and sustainable practices that contribute to climate change mitigation in all operations.
- Promote environmental management systems equivalent to the requirements of ISO 14001.
- Promote environmental strategies that comply with the ITP Aero Group's Environmental Policy included in the Annual Environmental Statement published on the corporate website.
- Comply with all applicable environmental laws and regulations, including those concerning regulated chemicals and substances, obtain and comply with all necessary environmental permits, and properly dispose of all hazardous and regulated substances.

5. Ensure responsible sourcing

- Implement specific measures to ensure that the sourcing of conflict minerals is conducted in a socially responsible manner, with transparent disclosure of origins in line with international standards and with due regard for human rights.
- Disclose information regarding the sources of such materials upon request by the ITP Aero Group.

6. Respect import and export regulations and obligations

- Act responsibly and ensure full compliance with all applicable international trade laws.
- Hold the necessary authorizations and licenses for the import and export of goods, services, technology, and information.
- Ensure that the export classification of the products and services provided complies with current regulations and that the required authorizations are in place for delivery to the end user.
- Comply with all applicable sanctions and embargoes, including those that apply to sub-suppliers.

7. Respect competition laws

- Suppliers must act with integrity and strict adherence to all applicable competition and anti-trust laws in every jurisdiction where they conduct business. This includes, but is not limited to: Avoiding anti-competitive practices, such as price-fixing, market sharing, bid rigging, or abuse of dominant market positions.

8. Comply with anti-bribery, anti-corruption and anti-money laundering regulations

- Prohibit and actively prevent all forms of bribery and corruption, whether direct or indirect, including through third parties or intermediaries.
- Refrain from making or accepting irregular payments or collections originating from illicit or criminal activities.
- Avoid any involvement in money laundering or the financing of terrorism and take appropriate steps to detect and prevent such activities.
- Do not offer, promise, give or accept gifts, hospitality, or any other form of special treatment that could improperly influence, or appear to influence, business decisions, or create a conflict of interest.
- Prohibit facilitation payments, i.e., unofficial payments made to expedite or secure the performance of routine governmental actions, whether directly or through third parties.
- Avoid any conduct that may constitute tax evasion or fraud, including misuse of public funds or grants, manipulation of financial or operational data, or any other act that could be interpreted as fraudulent or deceptive.
- Implement robust internal controls, policies, and procedures to prevent and detect corruption, bribery, money laundering, and terrorist financing.
- Comply with all applicable anti-corruption, anti-bribery, anti-money laundering and counter-terrorist financing laws and regulations.

9. Ensure the accuracy and integrity of records

- Ensure the accuracy and veracity of all commercial, operational and financial records related to ITP Aero Group's business, engaging in fraud prevention and detection activities.
- Immediately notify the ITP Aero Group of any errors in transactions and records relating to the Group's business.

10. Avoid conflicts of interest

- Suppliers must promptly inform the ITP Aero Group of any personal or external interests that may influence, or appear to influence, the actions or decision-making of ITP Aero Group or its employees. This includes any relationships, financial interests, or other circumstances that could create a potential conflict of interest.

11. Protect information and intellectual property

- Protect confidential information and the intellectual and industrial property of the ITP Aero Group, in strict compliance with any confidentiality agreements signed with the Group.
- Refrain from obtaining data or information about competitors through unlawful or unethical means.
- Implement appropriate physical and electronic security measures, proportionate to the level of risk, to safeguard the information and data belonging to the ITP Aero Group.

12. Safeguard the brand and image of ITP Aero Group

- Do not use the corporate image of the ITP Aero Group, including its name, logo, trademarks, or any other identifying elements, without prior written authorization.
- Refrain from disclosing or making public any information related to the ITP Aero Group or its business activities to third parties, particularly the media and/or via social media platforms, without express consent.

13. Ensure ethical behavior in relationships with the institutions

- In any interactions with institutional or political representatives—such as public administrations, civil servants, officials, agencies, and/or their representatives—in connection with activities related to the ITP Aero Group, suppliers must act with full transparency, integrity, and honesty.



