

# CODE OF CONDUCT



# CONTENT

• Letter from the CEO of ITP Aero Group	3
• Our corporate values	4
• Who does this Code of Conduct apply to?	5
• What is the role of ITP Aero Group?	6
• What does ITP Aero Group expect from its people?	7
• What to do in case of non-compliance? // What to do in case of inquiries?	8
• Our principles	10
1. Our PEOPLE	11
1.1. We respect human rights	11
1.2. We promote the development of our people	12
1.3. We provide a safe and healthy workplace	13
1.4. We ensure the privacy and confidentiality of personal information of those working at ITP Aero	14
1.5. We promote the responsible use of company resources	15
1.6. We are transparent with our people	16
2. Our BUSINESS	17
2.1. We guarantee the quality and safety of all our products and services	17
2.2. We ensure the accuracy and integrity of the ITP Aero Group's records and books	18
2.3. We comply with international trade regulations and obligations	19
2.4. We respect competition laws	20
2.5. We comply with anti-bribery and anti-corruption and anti-money laundering measures	21
2.6. We ensure ethical behavior in our relationships with shareholders, customers, partners, suppliers and collaborators	22
2.7. We avoid conflicts of interest and manage them appropriately if they arise	23
2.8. We protect information and intellectual property	24
3. Our ENVIRONMENT	26
3.1. We maintain ethical conduct in our relationships with institutions	26
3.2. We are environmentally responsible	28
3.3. We are committed to our community	29
3.4. We protect our corporate identity and reputation	31
• Contact	32



# Letter from the **CEO of ITP Aero Group**

I am pleased to present the **ITP Aero Group Code of Conduct**, a document that reflects the evolution of our company in a dynamic and increasingly complex global environment. As a key player in a cutting-edge industry, we are committed to upholding the highest standards of quality, safety, compliance and ethical practices.

This Code of Conduct outlines the principles and values that guide the actions of all members within the ITP Aero Group. It serves as a framework for responsible conduct, fostering a culture of integrity, respect and accountability across our organization.

In today's world, where transparency and ethical responsibility are more important than ever, this Code of Conduct forms the basis of our Ethics and Compliance Program. It is supported by clear policies, procedures and reporting channels, all designed to ensure that our operations meet the highest standards of compliance and business ethics.

The Code of Conduct not only sets expectations for the conduct of our people within the organization, but also extends to our relationships with customers, suppliers, partners and the wider community. It is our collective responsibility to uphold these values in everything we do, both in and outside the workplace.

We encourage all stakeholders to explore the Code of Conduct and understand how ITP Aero Group integrates it into its decision-making, actions and long-term strategy. By promoting ethical behavior and professional integrity, we aim to build trust and ensure that ITP Aero Group continues to grow in a sustainable and responsible manner.



**Eva Azoulay**  
**CEO of ITP Aero Group**

# Our **corporate values** as a **starting point**

## OUR VALUES



# Who does this Code of Conduct apply to?

All people who are part of the ITP Aero Group must act with integrity, responsibility, and honesty in their work. Our Code of Conduct (hereinafter, also "Code") serves as a guide to help us achieve this.

This Code provides a framework for appropriate behavior in our performance and daily activities. It applies to **all employees**, regardless of their role, position, geographical location, or company belonging to the ITP Aero Group and the **directors of each group company**. We also expect **our collaborators, professionals and temporary or external staff** working with or in the ITP Aero Group to act in accordance with this Code. All of them are referred to throughout this Code as "people subject to the Code of Conduct", "people" and/or "subject people".

For ITP Aero suppliers we have drafted a specific Supplier Code of Conduct aligned with this Code.

## OUR RESPONSIBILITIES:

**It is important that everyone within the ITP Aero Group understands the obligation to respect this Code**, ensures its compliance, and acts within the framework of the Group's policies and procedures. Failure to comply with ITP Aero Group's internal regulations may result in disciplinary measures.

Both the ITP Aero Group and its people are subject to the laws and jurisdictions applicable in each country where they operate.

However, legal provisions can be complex and vary between territories. If you have any doubts about their interpretation or scope of application, or consider that there may be a conflict between applicable laws in different jurisdictions, you should consult with the Ethics & Compliance department of the ITP Aero Group.

## AND IF YOU HAVE AMONG YOUR FUNCTIONS THE MANAGEMENT OF TEAMS, YOU MUST, IN ADDITION:

- Lead by example. Promote and display exemplary professional ethical conduct.
- Make sure that the people in your team are aware of the Code of Conduct and understand its contents.
- Ensure strict compliance with the Code among your team members. Do not encourage the achievement of results at the expense of ethical conduct.
- Create an open environment and dialogue in which your team members can raise ethical concerns.
- Answer all questions and concerns carefully and thoughtfully. There is no obligation to provide an immediate response.
- Don't be afraid to ask for help. If you have questions, ask the Ethics & Compliance department.



# What is the role of ITP Aero Group?

Create a safe environment that promotes the ethical principles established in our Code of Conduct.



Everyone at ITP Aero Group has the right to work in an environment that respects ethical principles.

If you see or experience conduct that breaches this Code of Conduct or the law, you should report it through the Ethics Line. Your identity will be protected, and the information will be handled confidentially (see section ["What to do in case of a non-compliance"](#)).

# What does ITP Aero Group expect from its people?

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

- Take the time to read and understand all the principles and guidelines set out in this Code of Conduct and in the policies and procedures that apply to you.
- Make sure that in your daily activities you comply with this Code and with applicable laws.
- Promptly report any concerns regarding breaches of this Code of Conduct or applicable law.
- Cooperate with investigations in an honest and integrated manner.
- Never retaliate against those who file complaints or promote consultations.

There will be times when you face a situation that raises ethical concerns.

In such cases:

## **1. REFER TO THIS CODE OF CONDUCT TO SEE IF IT PROVIDES GUIDANCE.**

## **2. APPLY COMMON SENSE:**

- **Can I or should I do this?** - Ensure compliance with laws and regulations.
- If this action is public, **would I like my name to appear?** - Make sure of the image we convey to the outside world.
- **Should I do this // Would I feel safe if I were subject to inspection or had to explain myself in a court of law or my family?** Make sure your actions promote trust, transparency, respect and integrity,

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**IF THE ANSWER IS “NO” TO ANY OF THESE QUESTIONS, DON’T DO IT.**

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## **3. IF IN DOUBT, ALWAYS ASK THE ETHICS & COMPLIANCE DEPARTMENT.**

If you hear phrases like the ones below and are unsure how to proceed ask for help:

- **“Nobody is going to find out.”**
- **“It doesn’t matter how we do it as long as we do it”. “It’s not right, but everybody does it”.**
- **“Don’t worry, that’s how we do things here”.**
- **“Do what you want, but I don’t want to know anything about it”.**

# What to do in case of non-compliance?

We all have a responsibility to ensure compliance with ITP Aero Group's ethical standards.

If you observe behavior that raises concerns or that you believe may be in breach of our Code of Conduct, our policies, applicable laws or regulations, you should report it immediately. By doing so, you give the company the opportunity to address the problem and put in place solutions and controls.

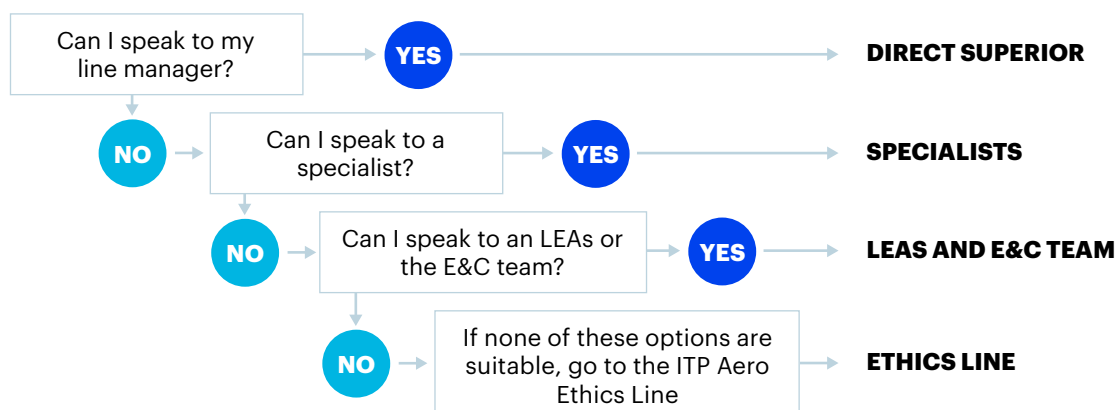
To do so, you can use the Ethics Line channel, available both on the ITP Aero Group website and on the corporate intranet.

[Access Ethics Line](#)



# What to do in case of allegations or inquiries?

If you have a doubt and need to ask a question, the following channels are available to you:



**IN CASE OF ALLEGATIONS, THE CHANNEL IS THE ETHICS LINE.**



## **Anonymity and Confidentiality**

The Ethics Line allows you to report violations anonymously if you wish to do so. During the investigation, full confidentiality of the process is guaranteed. All data will be protected in accordance with the privacy regulations in force in each country.

## **The Ethics & Compliance Function**

At ITP Aero Group, we have an Ethics & Compliance department responsible, among other things, of ensuring impartiality and objectivity in the receipt and investigation of any allegation. In addition, ITP Aero Group has a network of LEAs (Local Ethics Advisors), who voluntarily help promote ethical culture within the ITP Aero Group. They provide a direct and accessible channel for you to ask questions and raise concerns about ethical issues.. They will tell you where to find information, who to contact, and act as intermediaries if necessary.

## **Anti-retaliation policy**

If you raise a situation where you believe the Code of Conduct or applicable law is being breached, you are expected to show cooperation and answer all questions with integrity and honesty.

ITP Aero Group has put in place mechanisms to ensure that there are no consequences for good faith whistleblowers.

ITP Aero Group values collaboration in order to identify and solve problems.

Reporting a potential violation or participating in an investigation process shall not be the basis for an action that jeopardizes the employment, professional status, remuneration or development of bona fide whistleblowers.

## **False accusations**

Intentionally making a false allegation, knowingly lying to those responsible for following up the allegation or refusing to cooperate with an ongoing investigation, is a breach of the Code of Conduct, which can have disciplinary consequences. ITP Aero Group will protect anyone who raises a concern honestly, i.e. by providing truthful information about a matter of concern, regardless of whether or not it is ultimately determined that a breach of the Code of Conduct has occurred.

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**THE COMPANY IS COMMITTED AND OBLIGATED TO  
RESPOND TO ALL ALLEGATIONS.**

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# PRINCIPLES

## **1. Our PEOPLE**

- 1.1. We respect human rights
- 1.2. We promote the development of our people
- 1.3. We provide a safe and healthy workplace
- 1.4. We ensure the privacy and confidentiality of personal information of those working at ITP Aero
- 1.5. We promote the responsible use of company resources
- 1.6. We are transparent with our people

## **2. Our BUSINESS**

- 2.1. We guarantee the quality and safety of all our products and services
- 2.2. We ensure the accuracy and integrity of the ITP Aero Group's records and books
- 2.3. We comply with international trade regulations and obligations
- 2.4. We respect competition laws
- 2.5. We comply with anti-bribery and anti-corruption and anti-money laundering measures
- 2.6. We ensure ethical behavior in our relationships with shareholders, customers, partners, suppliers and collaborators
- 2.7. We avoid conflicts of interest and manage them appropriately if they arise
- 2.8. We protect information and intellectual property

## **3. Our ENVIRONMENT**

- 3.1. We maintain ethical conduct in our relationships with institutions
- 3.2. We are environmentally responsible
- 3.3. We are committed to our community
- 3.4. We protect our corporate identity and reputation

# »»» 1. Our PEOPLE

## 1.1. We respect human rights

We respect internationally recognized Human Rights through the United Nations International Bill of Human Rights, the OECD Guidelines for Multinational Enterprises, the Declaration of the International Labor Organization (ILO) and its fundamental conventions. We are committed to the continuous monitoring and improvement of the human rights of our employees and throughout our value chain, especially with the most vulnerable groups.

- We maintain zero tolerance for all forms of human rights violations, including modern slavery practices such as bonded labor, forced labor and child labor.
- We take specific measures to ensure that the extraction of conflict minerals, chemicals and other materials is conducted in a socially responsible manner, respecting people and the environment.
- We respect people's rights, freedom of association, the right to collective bargaining and the right to strike.
- We promote an inclusive and non-discriminatory workplace where everyone feels respected and valued.
- We respect the reconciliation of work and family life.
- We treat all staff and all applications fairly, objectively and impartially.
- We encourage respectful treatment between people and do not tolerate violent behavior, physical, psychological or moral harassment or abuse of authority, as well as intimidating or offensive behavior.

“ At ITP Aero Group we take care of our people, treating everyone with the utmost respect and dignity, in a positive and collaborative working environment. ”

## APPLICATION OF THE CODE TO OUR EVERYDAY WORK.

- Respect all the people who work in ITP Aero Group.
- Behaviours such as:
  - » Verbal or physical attacks.
  - » Abuse or any other form of intimidation.
  - » Discriminatory behaviour.
  - » Degrading comments.
  - » Jokes, pictures, texts or e-mails containing taunts or insults.
- We do not hire employees below the legal working age.
- We reject any refusal to allow employees to associate freely (formally or informally).

## 1.2. We promote the development of our people

- We have a high-performance culture based on achieving great results in a sustainable way, in a healthy working environment.
- We recognize the talent and contributions of our people in accordance with the team development processes, aligned with our values and behaviors.
- We promote continuous 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, inclusive and non-discriminatory work environments so that all people have equal opportunities to develop their potential.



At ITP Aero Group we are committed to creating challenging and stimulating development environments, promoting professional growth and individual development.



### WHAT IS MEANT BY PROFESSIONAL DEVELOPMENT OF EMPLOYEES?

Career development at ITP Aero is underpinned by our recruitment and onboarding, learning, and talent review processes.

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

In addition, the entire workforce has at its disposal, on the intranet, the gateway from where they can manage all the functionalities linked to talent and be protagonists in their own development.

### APPLICATION OF THE CODE TO OUR EVERYDAY WORK.

We provide fair career opportunities aligned with the ITP Aero Group's needs and encourage open, respectful communication by applying for vacancies that support your development, informing your line manager when doing so, giving and receiving feedback respectfully, and listening to others to promote teamwork and dialogue.



### 1.3. We provide a safe and healthy workplace

- We ensure a workplace that complies with health and safety regulations in working environments, as well as a favorable environment for the well-being and performance of people in the ITP Aero Group.
- We are committed to the highest standards of occupational health and safety. We have an Occupational Risk Prevention Management System integrated into all work processes and access to our facilities.
- We care for the health of those who work in our organization through preventive measures and care for people with health problems. And we do not allow practices that put the safety of our staff at risk.
- We do not allow the consumption of controlled substances such as alcohol, tobacco and drugs on our premises.



At ITP Aero Group we take care of our people. Health and safety measures are designed to protect our employees or any third party accessing our facilities.



#### WHAT DO WE MEAN BY WORKPLACE?

At ITP Aero we consider the workplace to encompass any area in which ITP Aero people provide their services, from workstations in our facilities (offices and plants) to mobile work equipment, means of transport and accommodation on business trips and commuting to work sites.

#### APPLICATION OF THE CODE TO OUR EVERYDAY WORK.

- Know and comply with all occupational health and safety training, education, and standards.
- Report any issues that may affect the health and safety of people at ITP Aero, including any specific health needs or unsafe conditions.
- Do not take risks or expose yourself or others to danger on ITP Aero premises.
- Abstain from consuming alcohol, tobacco, or drugs on company premises or arriving at work under their influence.
- Maintain cleanliness, hygiene, and wear appropriate or required clothing at the workplace.

## **1.4. We ensure the privacy and confidentiality of the personal information of those working at ITP Aero**

- We respect privacy and guarantee compliance with legislation on the protection of personal data and respect for the professional's right to privacy.
- Only personal information that is legally authorised and necessary for the performance of the Group's business and obligations is collected and processed in accordance with applicable laws.
- We ensure that security systems (video cameras, access controls, etc.) respect individuals' rights.



We protect the privacy of personal information by limiting its use.



### **WHAT INFORMATION IS CONSIDERED TO BE “PERSONAL DATA”?**

Personal data is considered to be any information that identifies or could identify an individual, not only information of a private nature. It includes both personal and professional data (such as CV or contact details), although data for professional use may be disclosed on a limited basis and in work-related contexts.

### **APPLICATION OF THE CODE TO OUR EVERYDAY WORK.**

- In the event of inadvertent access to personal data, do not share, use or disseminate it, and promptly contact the Information Security Officer.
- Do not share information about a colleague, even if they have posted it on a social media to which you have access. We respect people's privacy and right to privacy.

## 1.5. We promote the responsible use of company resources

- We promote responsible and appropriate use of the Group's resources (material, financial, technological and intellectual), limiting their use to the work environment.
- We must use and protect information about the Group, our customers, employees and suppliers appropriately.
- We do this by protecting our systems, devices and technology. We prohibit the misuse of our information and communications systems available to employees by limiting the transmission of confidential, protected or personal information.
- We prohibit the use of the Group's information resources for unlawful purposes (accessing illegally distributed, sexually explicit or inappropriate materials), as well as for offensive, obscene or inappropriate acts or comments.
- We monitor the use of Group resources to ensure compliance with the principles of this Code.



We use the resources and proprietary information of the Group in a manner responsible.



### WHAT IS CONSIDERED AN ITP AERO RESOURCE?

Company money, your work time and that of other employees. ITP Aero's (or its customers' or suppliers') confidential or proprietary information and proprietary data, ITP Aero Group products and employee work product, ITP Aero's communication and information systems. ITP Aero's technology, systems and software, material and furniture of the workspaces, buildings, installations, machinery, waste material or material to be scrapped or destroyed...

### APPLICATION OF THE CODE TO OUR EVERYDAY WORK.

- Do not download content from the internet may affect the security of the Group's information security.
- Do not access potential malicious emails, or download email attachments where you do not know the sender. It may compromise the security of the company.
- Limit unprofessional use of computer resources, internet access, telephone data, etc.
- Use the personal protective equipment provided by ITP Aero responsibly. Its use is limited to the performance of your job, where it is subject to controlled conditions of care and safety.

If you have any doubts about the use of corporate equipment, ask your IT security manager for more information by emailing [ITSecurity@itpaero.com](mailto:ITSecurity@itpaero.com).

## 1.6. We are transparent with our people

- We provide people working at ITP Aero with the information they need for their professional performance and to know and understand ITP Aero's strategy.
- We guarantee transparency in communication with our people, respecting the limits of business confidentiality.
- We encourage communication and the expression of our people in order to take into account and attend to their needs and opinions by providing them with the appropriate channels to convey them.
- We communicate our Strategic Plan to everyone in the ITP Aero Group.



Our reputation for integrity and honesty starts within the ITP Aero Group.



### TOOLS THAT PROMOTE TRANSPARENCY IN COMMUNICATION WITH PEOPLE:

- Employee Engagement Survey.
- Intranet and employee portal.
- Ethics Line.
- Performance appraisal, development interview.
- Team meetings.
- Training.
- Corporate publications.
- Corporate events.

### APPLICATION OF THE CODE TO OUR EVERYDAY WORK EXAMPLES.

- Use the channels that ITP Aero Group makes available to you to express yourself, give your opinion, raise inquiries or make allegations. Always express yourself with respect, understanding when comments can be perceived as offensive or harmful.



## »»» 2. Our BUSINESS

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

- We are committed to developing and embedding a culture of product and service quality and safety, continuously training our people to make quality and safety a priority.
- We design, produce, deliver and sell quality products that guarantee the health and safety of customers, users and employees.
- We are constantly working on and investing in the improvement of our procedures and the enhancement of our products and processes.
- We implement in our management system the tools of continuous improvement aimed at guaranteeing maximum levels of quality and safety.

“ We train people, we improve processes, we guarantee quality. ”

### APPLICATION OF THE CODE TO OUR EVERYDAY WORK.

All ITP Aero people must follow safety and quality guidelines and manuals. It is a requirement to prioritize safety, quality and excellence in the design, production, manufacture, repair, delivery, installation, maintenance and repair of any product.

- All inspections and tests must be carried out accurately and in accordance with established standards.
- ITP Aero people involved in each process must have the necessary qualifications and certification. You cannot carry out any work for which you are not qualified.
- We do not allow you to work with materials that do not comply with the set standards. You cannot “turn a blind eye” to the non-conformity of a material.



## **2.2. We ensure the accuracy and integrity of the ITP Aero Group's records and books**

- Our records, books, files and documents are valuable assets, essential to the effective operation of ITP Aero Group. We manage them properly and comply with all applicable obligations.
- We are committed to the accuracy and integrity of all business, operational and financial records.
- We promptly notify our customers, suppliers and authorities of any errors in our operations and records.
- We are committed to preventing and detecting fraud.
- No transactions may be carried out for the purpose of tax evasion or misrepresentation of accounting or financial information, nor may we facilitate such conduct by third parties in their dealings with ITP Aero Group.
- All economic transactions must be recorded truthfully, clearly and in accordance with applicable regulations. Business activities must comply with the law, particularly in relation to taxation and public aid.
- We promote transparency and cooperation with national and international authorities and regulatory bodies in all jurisdictions where ITP Aero Group operates.



We provide accurate and clear financial information that is useful for the conduct of our business.



### **WHAT IS CONSIDERED A RECORD WITHIN THE GROUP?**

Records of assets, liabilities, income, expenses and business transactions, budget proposals, business plans, economic evaluations, quality reports, KPIs and efficiency indicators, job allocations, legal agreements, inventory records, employee performance management documents.

### **APPLICATION OF THE CODE TO OUR EVERYDAY WORK.**

- All relationships with customers and suppliers must be accurately and truthfully reflected in the company's records.
- You must cover time records accurately and precisely and may not falsify them. All information within ITP Aero Group must be truthful and clear.

## 2.3. We comply with international trade regulations and obligations

- As a global company, we comply with international trade laws and have the appropriate authorizations for the import and export of goods, products, services, technology and information.
- We comply with applicable customs requirements for the import and export of goods.
- We abide by national and international sanctions and embargoes when establishing trade relations.



We ensure compliance with international trade regulations and put controls in place to mitigate any risks.



### WHAT REGULATES EXPORT AND IMPORT REGULATIONS?

Governments and international bodies regulate the movement of goods and technology to ensure security in international trade. These controls affect imports, exports, financial transactions and the transit of people. Sanctions, embargoes and re-export restrictions may also be imposed. The customs authorities set the rules governing the entry and exit of goods into and out of a territory.

### APPLICATION OF THE CODE TO OUR EVERYDAY WORK.

- 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.
- Do not share controlled technology (by E-Mail, Sharepoint or in conversations) without ensuring that you have the export licence covering the recipient.
- Visitors should be prevented from accessing information or controlled items without authorisation.
- Do not travel with a laptop or other device with controlled technology or information without proper authorisation.
- 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.
- The ITP Aero Group establishes internal procedures that impose export and import restrictions on items depending on the country.

## 2.4. We respect competition laws

- We strictly comply with competition legislation (applicable competition laws or antitrust laws) in all areas in which we operate.
- We are careful in our interventions in technical and commercial forums and events to avoid exchanging any detailed information with competitors on prices, costs, volumes, R&D, technical information or other commercially sensitive information pertaining to us.
- We tender for contracts in compliance with the law and in accordance with good business practices.



We are committed to promoting free, transparent and fair trade, in strict compliance with competition rules.



### SOME ASPECTS REGULATED BY COMPETITION LAW

- Communication or agreements between competitors, particularly relating to prices or conditions of sale.
- State aid.
- Mergers and acquisitions, as well as joint ventures or other types of collaborations.
- Boycotts and allocations of customers, products or territories.
- Exclusivity agreements.
- Restrictions or partnership agreements with suppliers

### APPLICATION OF THE CODE TO OUR EVERYDAY WORK.

- Do not agree on prices with competitors or enter into any arrangements that may be abusive or anti-competitive.
- If you have any suspicions or indications of anti-competitive behavior, please inform our Legal Department and contact them if you have any doubts about how to proceed.



## 2.5. We comply with anti-bribery, anti-corruption and anti-money laundering measures

- ITP Aero has zero tolerance for corruption and bribery. It prohibits all forms of bribery, corruption and money laundering.
- We strictly comply with anti-corruption and anti-money laundering laws in all countries where we operate.
- We have robust internal controls, policies and procedures in place to prevent and detect corruption, bribery, money laundering and terrorist financing.
- We do not accept or offer gifts or entertainment that could influence business decisions.
- We refuse facilitation payments. We do not make payments to expedite procedures or services, nor do we allow third parties to do so on our behalf.
- We are committed to the fight against money laundering. We only accept funds from legitimate sources.
- We do not collaborate with or facilitate tax evasion by third parties.

“ We have zero tolerance for corruption and bribery. We maintain high standards of integrity and transparency, ensuring an ethical and responsible business environment. ”

### WHAT DO WE MEAN BY...?

**Corruption:** Misuse of power for personal gain or undue advantage, financial or otherwise.

**Bribery:** Offering, giving, receiving or soliciting something of value to improperly influence decisions or actions of persons or organizations, public or private.

**Money laundering:** Process of giving a lawful appearance to goods or assets derived from criminal or illicit activities.

**Facilitation payments:** Informal payments made to expedite routine official procedures; these do not include lawful fees or payments made under duress.

### APPLICATION OF THE CODE TO OUR EVERYDAY WORK.

- Avoid offering promises, gifts or presents that could be perceived as an attempt to influence business decisions.
- Never use third parties for improper actions.
- Do not agree to make any type of facilitation payment.

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

- We act fairly, ethically and responsibly towards all third parties: shareholders, customers, partners, suppliers and collaborators.
- We choose our partners and suppliers based on objective business criteria and verify that they share our ethical values through due diligence processes.
- We require our third parties to comply with anti-corruption, anti-bribery, anti-money laundering, antitrust, import and export and other applicable regulations.
- We encourage partners and suppliers to apply our policies and principles on legal compliance, human rights, sustainability and safety.
- We verify the integrity and ethical conduct of all employees who are not directly employed by us.

### **WHAT DEFINES A THIRD-PARTY RELATIONSHIP?**

The guarantee of ethical behavior in our interactions with third parties extends beyond commercial or contractual relationships and includes any type of professional contact, such as informal meetings, presentation of proposals, negotiations or selection processes.



We believe that business and professional relationships should be based on trust, mutual respect, fairness, ethics and responsibility.



### **APPLICATION OF THE CODE TO OUR EVERYDAY WORK.**

- We carefully select our partners and collaborators and always monitor their conduct. Our partners or suppliers should be committed to integrity and our ethical principles. Always make sure to include contractual clauses that reflect this commitment.
- Follow ITP Aero's due diligence processes and ensure that all third parties go through the ITP Aero Group's established screening processes.
- You may not make use of an unauthorized or unqualified employee and you must ensure that such an employee does not act on behalf of the company without such authorization.

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

- We ensure fair and objective decision-making within the ITP Aero Group, always taking into account business interests as opposed to personal interests.
- We avoid any financial, commercial or personal relationships that could influence our independence.
- We guarantee the absence of vested interests in our actions and decisions at work.

### HOW DO YOU KNOW IF YOU HAVE A CONFLICT OF INTEREST?

All you have to do is ask yourself these three questions:

- Could my personal interests interfere with those of ITP Aero Group?
- Even if there is no real conflict, could there appear to be one?
- Would I feel comfortable if someone found out about the situation or relationship?

If the answer to any of these is “yes” or “maybe”, consult with the Ethics & Compliance team and act transparently.



We are committed to identifying and managing any conflicts of interest in a transparent manner, ensuring that our decisions and actions are always taken in the best interests of the Group.



### APPLICATION OF THE CODE TO OUR EVERYDAY WORK.

- Always make business and professional decisions based on what is objectively best for ITP Aero Group and not for you.
- If you have a personal connection with a candidate for a professional position and you foresee involvement in the selection process or a future working relationship (such as a reporting line or direct collaboration hierarchical relationship, working together, etc.), you must report the situation.
- Report any potential, actual or apparent conflict of interest.

ITP Aero has a system for reporting potential, actual or apparent conflicts of interest, use it if you find yourself in such a situation.

## 2.8. We protect information and intellectual property

- We consider information to be a very valuable asset, especially protecting confidential information, both that of ITP Aero Group's own information and that entrusted to us by customers, partners or suppliers.
- We protect our own information and intellectual property rights, ensuring the value of our innovation and our brand.
- We promote innovation and development, protecting and safeguarding inventions developed by employees in the course of their work.
- We protect the information and the intellectual property rights of third parties with whom we work, providing security for customers, business partners and suppliers.
- We compete in our industry on the basis of ethical conduct, developing products and processes in good faith, without gaining competitive advantage through illegal means.
- We comply with all applicable laws and contractual obligations regarding the value of intellectual property such as patents, designs, trademarks and trade secrets.
- We comply with AI principles that demonstrate a commitment to ethical, transparent and fair practices, strengthening the trust of employees, customers, partners and regulators.
- We have an Information Security Management System that safeguards the integrity, availability and confidentiality of the information we process, implementing measures to prevent attacks and information leaks.
- We maintain a control system for documentation classified by defense entities (NATO, EU, MDEF).

### WHAT IS CONSIDERED CONFIDENTIAL INFORMATION OF ITP AERO GROUP?

ITP Aero's confidential information is considered to be all non-public information which, if disclosed without authorization, could harm ITP Aero Group or third parties, affect strategic operations or give undue competitive advantage. This includes technical and technological know-how, financial information and data received under confidentiality agreements with customers, partners and suppliers.



We are committed to protecting the confidentiality of information and respecting intellectual property rights, ensuring that all data and creations are treated with the utmost care.





## APPLICATION OF THE CODE TO OUR EVERYDAY WORK.

- Do not share confidential or proprietary information with any third party unless you have express permission to do so.
- Do not access, retain, share or use confidential information of a third party, including the confidential information of a former employee, without first consulting them.
- Always act in accordance with signed confidentiality agreements. Do not share confidential information, even internally, within the ITP Aero Group.
- Classify, identify, store and share all data, information and documents in accordance with the established Classification of Information.
- If you have any doubts about what information you could share externally, please contact the Communications Department and the Group's Legal Department.



## »»» 3. Our ENVIRONMENT

### 3.1. We maintain ethical conduct in our relationships with institutions

- Our business engages with institutions in a variety of processes and environments; our ethical and professional behavior is a guarantee of continuity.
- Our business has no preference, affiliation or link to any political party.
- We do not make contributions or donations to political parties, organizations, academic institutions or any group linked to a political party or cause.
- We comply with all applicable laws and regulations, as well as with the contracts, terms and conditions established for working with public institutions.

#### WHO DO WE CONSIDER TO BE INSTITUTIONAL REPRESENTATIVES?

- Employees of any government or government entity.
- Elected members in the different forums (Congress, assembly, deputations, local corporations, etc.).
- Political parties and their party officials.
- Candidates for political office.
- Employees of local, regional, national and international public organizations and companies.



We collaborate in an ethical, transparent and accountable manner with institutions, promoting relationships based on integrity, respect and responsibility.





## APPLICATION OF THE CODE TO OUR EVERYDAY WORK.

- Avoid contacting public officials or institutional representatives on behalf of ITP Aero without complying with the applicable internal rules.
- Do not make corporate contributions to political parties or institutions on behalf of ITP Aero.
- Never commit to a sponsorship or donation unilaterally. Any sponsorship or donation activity must comply with the Social Investment Policy and be approved by leadership. Consult with the Communications department.
- Do not offer, promise, give or authorize gifts or event invitations to government employees that are inconsistent with ITP Aero's internal rules.
- Never talk to public officials or government employees about potential contracts, business deals, tenders, etc. if you are not authorized to do so.
- Your political activity must be in a private and personal capacity, never on behalf of ITP Aero.
- Consult with the Ethics & Compliance department if you plan to run for public office to avoid any potential conflict of interest.



### 3.2. We are environmentally responsible

- At ITP Aero we protect the environment and are committed to reducing our environmental footprint: by using resources (materials, water, energy) efficiently and minimizing waste, discharges and emissions.
- We have a certified environmental management system that helps us to improve efficiency by applying circularity principles. This system aims to ensure compliance with our environmental policy, thus guaranteeing our commitment to sustainability.
- At ITP Aero we know that climate change is a major challenge for our sector, and we are committed to decarbonization through different strategies such as the commitment to renewable energies.
- ITP Aero is part of the UN Race to Zero campaign, whereby we commit to reduce our emissions by setting science-based emission reduction targets and effective measurement systems.
- We are committed to creating and innovating more sustainable products.
- At ITP Aero we implement effective preventative measures to minimize environmental impact, including the adoption of clean technologies and sustainable practices that contribute to reducing our environmental impact in all operations.
- We act with full responsibility, complying with all applicable laws and regulations, and even setting standards of responsibility higher than those set by law.



At ITP Aero we adopt sustainable and responsible practices that minimize our environmental impact, actively contributing to the fight against climate change and promoting a more sustainable future for generations to come.



#### APPLICATION OF THE CODE TO OUR EVERYDAY WORK.

- Complies with internal safety and environmental standards.
- Minimizes the use of resources, encourages reuse and recycling.
- It requires our suppliers to apply sustainable practices.
- Comply with standards for emissions, water, chemicals
- Comply with applicable environmental legislation.
- If you have any doubts, please consult with the person in charge of the Environment.

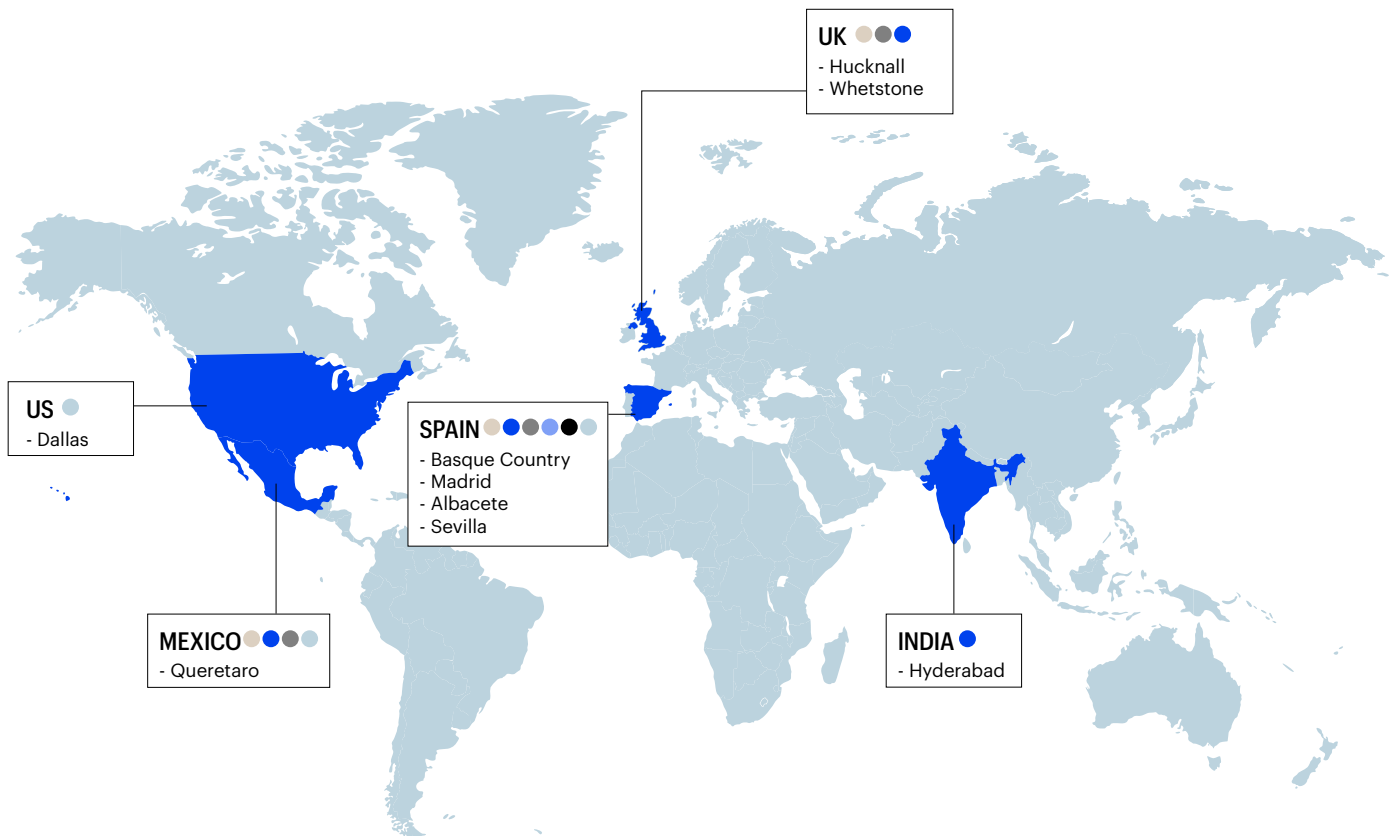
### 3.3. We are committed to our community

- We contribute positively to the communities where we operate, respecting the cultures and promoting sustainable development where we are present.
- We promote the economic development and social well-being of our local communities by channeling employees' interest in actions that have local social relevance, such as volunteering or charitable, environmental and welfare-related contributions.

#### WHICH COMMUNITIES ARE WE IN?

##### GLOBAL PLAYER

- Headquarters
- Engineering
- Manufacturing
- Assembly
- MRO
- Engine testing



We support and strengthen the local communities where we operate by actively participating in initiatives that promote social, economic and cultural wellbeing.





- We support and invest in the community with a special focus on the geographic areas where we are present.
- We respect the communities in which we operate, promoting environments free from discrimination and hatred and complying with all applicable local laws and regulations.

## HOW DOES IT AFFECT YOU?

You should pass on any requests for support or sponsorship you receive to the Communications Department.

## APPLICATION OF THE CODE TO OUR EVERYDAY WORK.

- If you believe ITP Aero can support a volunteering or community benefit activity, please contact the Communications Department to evaluate the proposal.
- Do not participate on behalf of ITP Aero in social events or actions that are not aligned with our community engagement commitments. If in doubt, consult the Communications department.





### **3.4. We protect our corporate identity and reputation**

- We protect our corporate identity and reputation and actively defend the interests of the ITP Aero Group globally.
- We help the media understand our business by ensuring that the information we disseminate is accurate, and that it is not misinterpreted or manipulated.
- We monitor our presence in the digital environment so that it reinforces our image and reputation and does not detract from it.

#### **REGARDING THE USE OF SOCIAL MEDIA:**

You must not use social media to disseminate information related to the company or its customers - unless it is corporate information and/or you are authorized to do so - or refer to it with inappropriate content or tone (vulgar, obscene, intimidating, threatening, etc.).

#### **WHAT IS CORPORATE REPUTATION?**

Corporate reputation is the set of perceptions held about a company by its main stakeholders and is the result of its corporate behavior over time, as well as its ability to provide value to these stakeholders.

#### **WHAT ABOUT CORPORATE IDENTITY?**

Corporate identity is all the elements that define the personality of a company and include the logo and its uses, the corporate colors, the typography, the style photographic and communication style, the corporate culture, the values and the purpose of the company.

#### **APPLICATION OF THE CODE TO OUR EVERYDAY WORK.**

- Do not make comments about ITP Aero on personal social media. If you identify yourself as an ITP Aero employee on your professional social media, make sure you do not disclose confidential information, and always communicate in an appropriate tone.
- If you want to participate in events, lectures, forums, university classes, where your presence is linked to your professional position, you must request authorization from your manager and contact the Communications department who will guide you so that the contents of your talk are aligned with the corporate identity and reputation of the ITP Aero Group without disclosing confidential information.
- If you intend to use the ITP Aero Group image for a presentation, lecture, forum, or similar activity, you must comply with the Corporate Identity Manual, which outlines the correct use of the brand elements and visual identity.
- Do not make public statements on behalf of ITP Aero. Any call, email or request from a journalist or media outlet must be referred to the Communications Department, which is responsible for handling such inquiries.

# CONTACT

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 Group policies that develop the ethical principles of this Code of Conduct.

If you have any inquiries regarding this Code of Conduct, please contact the Ethics & Compliance department. If you are an ITP Aero employee, you can also contact the network of LEAs.

To contact Ethics & Compliance, please do so through:

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

If you wish to report any conduct in breach or non-compliant with this Code of Conduct, you can do so through the Ethics Line, accessible through the corporate website and the intranet.

[Access Ethics Line](#)



