



CODE OF CONDUCT

This document before you is the Aeronamic Code of Conduct. In this document we, management and employees of Aeronamic, wish to present our view on how to interact with our employees, customers, suppliers, and other interested parties. We consider this Code of Conduct a manual which allows any party to take note of our core values and the standards and values maintained in our company. Aeronamic understands that the behaviour of our employees, suppliers and customers can be subject to change, therefore we consider this document a constant work in progress. If you have any suggestions for improvement, please do not hesitate to contact our HR manager.

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CORE VALUES

This Code of Conduct is based on our shared core-values:

Innovation

At Aeronamic, innovation is paramount. The way we do business is characterized by innovative acting and thinking. We wish to provide our customers with the most advanced, best suited and economically most attractive solutions. In this, we are willing and able to think out of the box.

Integrity

We act with great care and adequacy keeping in mind our responsibilities and complying with applicable rules and laws. Our methods can be fully justified and explained.

Quality

Aeronamic operates with a focus on quality. By doing so, we are committed to being a professional and reliable partner for our customers, suppliers and employees. We strive for excellence in everything we do.

Communication

We seek to keep a clear and open line of communication with all stakeholders and throughout the whole process, from the first contact up to the supply and maintenance of aviation systems.

Entrepreneurship

At Aeronamic we think along with our suppliers and customers. We like to enter into commercial partnerships with our suppliers. We offer the most cost effective solutions.

Working safely

At Aeronamic we work in the safest possible way and we pay attention to safe working conditions. We comply with all legal safety requirements. Additionally our companies extra safety requirements apply.

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INTERNAL

COLLEAGUES

We think it is important for employees to treat each other with respect. This does not exclude the possibility of a heated debate in case of disagreements, as long as at the end of the day colleagues still treat each other with respect. We wish for conflicts to be resolved and discussions to come to a fruitful end. We like to see colleagues take action in resolving conflicts. We do not want colleagues to be excluded.

Not acceptable

Taking on a victim's role or leaving a conflict unresolved. Unnecessarily provoking conflicts, showing disrespectful or harassing behaviour.

AGRESSION, VIOLENCE AND SEXUAL HARASSMENT

Respectful behaviour prevents aggression, violence and sexual harassment. We therefore actively listen to each other without interruption, with respect, stand by agreements and appreciate one another. We believe in communicating just and fair, which means that people should talk to each other, rather than about each other.

Not acceptable

Physical violence is, of course, prohibited. We do not want people to choose sides in a conflict, nor do we want people to insult or belittle one another or abuse their position.

HOW WE CONDUCT OURSELVES

We conduct our business in a correct way and this manifests itself in various ways. Answers to questions will be given on time and in a clear manner. We are reliable and stand by agreements made. We listen actively and if the situation so requires, ask clarifying questions. Errors are not covered up, but openly discussed to come up with solutions to prevent this from happening in the future. We are constructive, enthusiastic and pro-active. If necessary, we go the extra mile.

Not acceptable

It is undesirable to be occupied with matters other than the subject/target of the training or the meeting. The same applies to having a hidden agenda; with other words having a different motive or plan than the proposed target of the meeting/training.

COMPANY ASSETS

Aeronamic funds and assets are to be used for which they are intended. We expect our employees to handle our assets like they would handle their own. Should anything need repair or maintenance, this is to be reported to the appropriate office.

Not acceptable

Failing to report damaged goods and handling Aeronamic's equipment, materials and facilities in an inappropriate manner. Also use of Aeronamic assets for private purposes is unacceptable.

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WORKING SAFELY AND CLEANLY (5S) GENERALLY

Clean and safe work is of paramount importance to us. This applies to all our employees but also to all external parties working on site. Amongst others, clean and safe work is reflected in the proper use of personal protective equipment at properly equipped and clean workstations. We believe in setting a good example and addressing each other on proper safety issues. We will pay attention to safety at all levels; now and in the future.

Not acceptable

Ignorance with regard to the use of protective equipment and taking the use of protective equipment too easily. Failing to use protective equipment. Doing something 'briefly' (like crossing a safety line) whilst assuming that using protective equipment is unnecessary.

As working clean and safe have different implications for the offices as well as for the factory floor, we make a clear distinction between these two in our Code of Conduct.

OFFICE

For the office, the 'clean desk policy' means that neither products nor paper are to be left on the desks after working hours. The same principle applies to the digital work environment; work will be done in accordance with set standards and the digital environment (such as 'the hatch') is to be kept tidy.

Not acceptable

Papers and products (including fruit and coffee cups) which are left behind on desks, tables and in meeting rooms after working hours.

FACTORY FLOOR

On the factory floor, the tools are clean when they are returned to their tool boards or tool drawers. Damaged tools will be replaced. Whenever something runs out it must either be replenished or ordered.

On the factory floor, the clean desk policy is enforced as well and work is done according to specified 5S-standards. This means that we ensure that nothing is left behind that can cause FOD (Foreign Object Damage). FOD compliancy is part of our Aeronamic DNA.

On the factory floor, food is not allowed whatsoever. However, drinks are allowed in the designated areas following the 5S/FOD guidelines.

Not acceptable

Papers and products (including fruit and coffee cups) which are left behind on desks, tables and in meeting rooms after working hours.

Leaving tools and other items where they were last used or putting back dirty tools without cleaning them, is unacceptable.

Eating (all areas) and drinking outside of the designated areas on the factory floor.

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ALCOHOL & DRUGS

Aeronamic employees are sober at all times during working hours. Even when our employees are off work we expect them to be aware that they will return to work the next day and act accordingly. During company meetings or receptions alcohol is used in moderation.

With regard to cigarette smoking, Aeronamic has an active nonsmoking-policy and will help employees who wish to stop smoking. During breaks, employees are permitted to smoke outdoors in designated areas

Not acceptable

Using alcohol and drugs during working hours and being under the influence of such during working hours is prohibited. To return to work tired and unfit after an extended party weekend is undesirable

Smoking indoors.

INTERNET EN (SOCIAL) MEDIA

Internet and social media have become a common part of modern life and as such can no longer be eliminated from everyday life. Internet should be used first and foremost for business purposes. Internet access is essential for business purposes and employees are asked to exercise restraint when accessing internet for personal use. Files, emails and documents are to be scrutinized thoroughly before opening.

We are proud of and positive about our company and convey this on social media. We will hold back from giving relevant detailed information. We will comply with all applicable rules of confidentiality at all times. We make each other aware of how to handle sensitive information and with whom one should talk about it.

In case of lack of clarity or doubt about a publication, one is to contact the designated functionary. The Aeronamic Spokesman is the designated person for all contacts with the press..

Not acceptable

We consider it unacceptable when work is influenced by internet and/or social media use for private purposes. Visiting sites with explicit content (sex, violence, discrimination etc.) is not allowed.

RESPECT AND DISCRIMINATION

Regardless of a person's position within Aeronamic, we will at all times be amicable and respectful. We respect each other as a person and show respect for each other's work.

Not acceptable

We will not tolerate any form of discrimination, racism etc. Also bullying, belittling or deliberately excluding, ignoring, abusing and gossiping about a person or persons is unacceptable.

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ITAR – COMPLIANCE

We expect all our employees to be aware of the ITAR rules. ITAR compliancy is reflected in using the ITAR-stamp and conducting ITAR-communication with suppliers through our supply chain department.

When in doubt about ITAR applicability please refer to our ITAR Compliance Officers.

Not acceptable

To talk in public about ITAR-data, to have ITAR-data on one's travel-notebook, communicating about ITAR-data through every day email, to have ITAR-drawings on one's desk when absent and failing to check if a supplier is on the list of banned suppliers for an assignment where ITAR- compliancy is required are examples of unacceptable behaviour. These examples are by no means exhaustive.

CONFIDENTIALITY

It goes without saying that we don't talk about sensitive information. That is why we work according to the 'clean desk' policy and sensitive information is to be stored in the appropriate 'confidence' folder. Information is given only on a need to know basis. We are thoroughly aware of our customer's demands.

Sensitive information is only shared with third parties if an MCA (Mutual Confidentiality Agreement) is in place.

Not acceptable

Leaving your computer unattended and personal documents on one's desk is unacceptable. To share keys and/or passwords is also not acceptable.

INNOVATION

We actively seek to renew and improve business. Aeronamic, from top management to factory floor, encourages new ideas and improvements. In our communications we are proactive, put our ideas forward and work together on smart solutions. In this, flexibility and perseverance are our guiding principles.

Not acceptable

Not taking action when noticing improvement cases/points. Complaining but not actively contributing to the solution is considered unacceptable. To dismiss new ideas out of hand, saying yes but meaning no, to take credit for someone else's ideas or hold on to old methods without being open minded to change are all examples of unacceptable behaviour.

Of course this list is not exhaustive.

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EXTERNAL

ETHICAL BUSINESS CONDUCT / GIFTS

Our reputation depends upon the way our customers, suppliers, governments and society at large judge us. Aeronamic wants to do business in an ethical manner. We interact on a fair basis with our customers and suppliers, competitors and other stakeholders. All transactions are free from bribes, kickbacks, gifts or favours. We refrain from unfair trade practices such as money laundering and corruption and do not trade with insider information, do not give a misrepresentation of facts and do not manipulate.

Conflicts of interest, or the appearance of it, must be avoided at all times. If and when personal interests conflict with the company interests we consult the supervisor or HR Manager.

Not acceptable

Doing business with individuals and/or organisations that are on the list of banned and undesirable persons/organisations.

Accepting cash, bribes, contributing to money laundering and corruption.

OFFICIAL BUSINESS

When on official business, we adhere to the rules of our Travel policy, which is adjusted regularly to the prevailing situation. During official business travel we are representative of Aeronamic and we behave as such. This applies to the meetings as well as the leisure time during business travel.

ENVIRONMENT

We take our ecological footprint very serious and separate and recycle our waste as much as possible. Our company is organized in such a way that dangerous substances and products are used according to regulations. Before we proceed to order these resources and products, we have actively sought for less invasive products and/ or environment friendly impacting alternatives.

The proper Personal Protective Equipment is supplied to all to be able to work correctly with dangerous substances. We actively monitor the correct use.

We operate responsibly with regard to our energy consumption.

Not acceptable

Not disposing hazardous waste according to regulations, as well as insufficiently separating waste and temporarily incorrect storage of chemicals.

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COMPLIANCE

All Aeronamic employees comply with this Code of Conduct with regard to colleagues as well as stakeholders. Employees set a good example by acting according to the code of conduct and by addressing those who do not abide by the Code of Conduct.

Employees are encouraged to be open and honest in reporting (their own) faults or mistakes and reporting signals of misconduct. The board and management ensure that these matters can be discussed without negative implications for the employee concerned. In addition, the board and management ensure that reporting can be done safely to ensure appropriate action can be taken.

Reports of violence, sexual harassment, discrimination, racism, aggression or other forms of intimidation may be made to the confidential mediator. Following the notification there will be an investigation and action will be taken to prevent recurrence.

Employees who feel sexually harassed, psychologically or physically harassed or threatened, can contact the confidential mediator. If necessary emergency aid is provided and contact will be established with a doctor or other professional. Confidentiality is of course guaranteed if the employee so wishes.

Not complying with the Code of Conduct can lead to dysfunctional working relationships or damage to Aeronamic. Actions, proportionate to the circumstances can and must therefore be taken.

Aeronamic also has to consider her customers and suppliers. If a party does not abide by the Code of Conduct, the business relationship can, as a last resort be terminated.

At least once every two years this Code of Conduct shall be subject to a critical test and update.