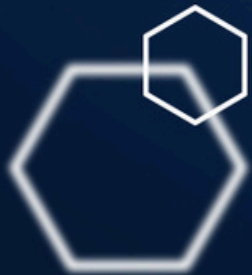




AERONAMIC

CODE OF CONDUCT



PUSH LIMITS



PUSH LIMITS

At Aeronamic, our core values unite us as a team and guide our daily work. Building trust with our colleagues, customers and communities is rooted in the integrity and high standards we share.

In everything we do, we prioritize safety, strive for first-time-right quality and adhere to the highest ethical standards outlined in this Code of Conduct.

Our Safety Management System ensures the safety, quality and compliance of our products and services for those who rely on them when operating, maintaining and flying our products.

I encourage you to read and understand Aeronamic's Code of Conduct, which provides guidelines for how we act on behalf of our organization. We hold every team member to these high standards, policies, and procedures - often exceeding those of other industries or manufacturers.

As Aeronamic's CEO, I fully endorse this Code of Conduct.

Steffen de Vries
CEO

A handwritten signature in white ink, appearing to read 'Steffen de Vries', is positioned to the right of the name and title. The signature is fluid and cursive, with a large loop at the end.

Aeronamic understands that the behavior 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 your manager. At least once every two years this Code of Conduct shall be subject to a critical test and update.

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

Innovative Entrepreneurship

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. There is no room for fraudulent activities and our working methods can be fully justified and explained.

Leadership

Our leaders inspire colleagues and team members to reach their full potential, fostering a culture of trust, respect and growth, and collectively striving for excellence and positive impact.

Ownership

We take full responsibility for our actions and their outcomes at every level of our organization. We avoid placing blame on others and put our egos aside. Our focus is on continuous improvement.

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, development and maintenance of aviation systems.

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.

Safety is the most important aspect in the Aerospace Industry.

Aeronamic uses the term “Safety” in two ways:

1. Safety involves the level of controlling and reducing risks associated with aviation activities, related to, or in direct support of the operation of aircraft;
2. Safety is about working safely and protect our employees so they can come home safely after work.

In everything we do and in all aspects of our business, we make safety our top priority, strive for first-time-right-quality, and hold ourselves to the highest ethical standards as set forth in this Code of Conduct.

Our Safety Management System ensures the **safety, quality and compliance** of our products and services for the people who entrust us with their lives when they operate, maintain and fly on our products.

This requires our unyielding commitment to the following:

- We commit to a **Safety Management System** to advance our goals for safety, quality and compliance;
- We foster a **positive safety culture** that enables proactive identification and mitigation of risks in order to prevent accidents, injuries or loss of life;
- We ensure all employees understand the **requirement to report** any safety hazard, incident or concern;
- We **promote a just culture** that protects and treats people fairly when they openly report safety, quality and compliance concerns;
- We **openly communicate safety actions** being taken while appropriately protecting the safety data and safety information driving those actions;
- We **clearly define the responsibilities** of all employees so that everyone understands their roles in ensuring the safety, quality and compliance of our products and services;
- We **eliminate or mitigate potential safety, quality and compliance risks** associated with our products and services which must include meeting all applicable requirements and regulations;
- We use **actionable key performance metrics and targets** that drive continuous improvement of our Safety Management System;
- We **allocate sufficient resources** (people, processes, tools, and training) to supporting this Code of Conduct.

We ensure all employees understand that we have a daily obligation to pursue safety, quality and compliance as described in this Code of Conduct. Not complying with the Code of Conduct can damage Aeronamic and consequently lead to a dysfunctional working relationship. Actions, proportionate to the circumstances can and must therefore be taken. As a last resort this can mean the termination of the employment contract.

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.

OWNERSHIP

We take full responsibility for our actions and their outcomes, focusing on what we must do to create future success and improvement. By setting a positive example and motivating others to take ownership, we uphold high standards. We set aside our egos, remain open to learning, and value others' ideas. Collaboration with other teams is essential for achieving mutual benefits and supporting our wider mission. We support each other when needed and work according to established standards and procedures to reach our common goals.

Not acceptable

*Blaming others or making excuses when things go wrong. Avoiding taking initiative when something is unclear or doubtful. Focusing only on our own problems without offering help to others.
Not following instructions and/or company policies, possibly leading to safety issues or other issues.*

RESPECT AND DISCRIMINATION

At Aeronamic, we believe it is important for employees to treat each other with respect. This doesn't exclude the possibility of heated debates when disagreements arise, as long as colleagues maintain respect for one another at the end of the day. We aim for conflicts to be resolved and discussions to reach a productive conclusion. We encourage colleagues to take active steps in resolving conflicts and ensure that no one feels excluded.

Regardless of a person's position within Aeronamic, we will always be amicable and respectful. We respect each other as individuals and appreciate each other's work.

Not acceptable

*We do not tolerate any form of discrimination or racism. Bullying, belittling, deliberately excluding, ignoring, abusing, or gossiping about someone is also unacceptable.
Adopting a victim's role or not resolving conflicts. Unnecessarily provoking conflicts or displaying disrespectful or harassing behavior.*

AGRESSION, VIOLENCE AND (SEXUAL) HARASSMENT

Respectful behavior helps prevent aggression, violence, and (sexual) harassment. To support this, we actively listen to each other without interruption, uphold agreements, and show appreciation for one another. We believe in fair and direct communication, which means talking to each other rather than about each other. If we witness disrespectful behavior, we address it directly with the colleague involved and, if needed, bring it to the attention of one of our confidential counselors.

Not acceptable

Physical and verbal violence are, of course, prohibited. We encourage everyone to stay neutral in conflicts, avoid insulting or belittling others, and not misuse their position. However, it's important to take action if you witness disrespectful behavior, aggression, violence, or any form of harassment. Doing nothing is not acceptable.

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.
Use of Aeronamic assets for private purposes.*

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.

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. 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 or outside the designated areas.

INTERNET AND (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.

PRIVATE SMARTPHONES

Bringing your smartphone to work is allowed with a few important guidelines. Taking photos or videos is only permitted when necessary for the production process, and always remember to follow ITAR restrictions. The use of private smartphones should be limited to coffee and lunch breaks.

Not acceptable

We consider it unacceptable when work is influenced by the use of private smartphones. It is not allowed to make photos/videos of products and documentation, unless it is necessary for the production process.

EXPORT COMPLIANCY

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 behavior. These examples are by no means exhaustive.

CLEAN DESK AND CONFIDENTIALITY

It goes without saying that we don't talk about sensitive information. This is why we work according to the 'clean-desk' policy, which means that no products or papers should be left on desks after working hours. This principle also applies to our digital working environment, where we work to set standards and keep digital spaces tidy. Information is given only on a need-to-know basis. We are well aware of our customers' requirements.

Sensitive information is only shared with third parties if an NDA (Non-Disclosure Agreement) is in place.

Not acceptable

Leaving your computer unattended (cyber security) and personal documents on one's desk. Sharing keys and/or passwords. Not Acting according to the "clean desk policy".

WORKING SAFE AND CLEAN

Safe and clean working is of utmost importance to us, both for our employees and for external parties working at the site. This commitment is reflected in the proper use of personal protective equipment and maintaining clean, well-equipped workplaces. We believe in setting a good example and addressing each other on appropriate safety issues, ensuring that there is a focus on safety at all levels now and in the future.

On the production floor, tools are cleaned before returning to their tool boards or drawers, and damaged tools are replaced. Stocks are replenished or ordered where necessary. The clean desk policy is also enforced here and 5S standards are followed to prevent foreign object damage (FOD), a core part of our Aeronamic DNA. Food and drink is only allowed in the designated areas according to 5S/FOD guidelines.

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. Papers and products (including food 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. Eating and drinking outside of the designated areas on the production floor.

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

Taking action when noticing areas for improvement is essential. It's less helpful to simply complain without actively contributing to a solution. We value an open attitude and believe it's important to give new ideas a fair chance. Examples of less constructive behavior include dismissing new ideas outright, saying yes but meaning no, taking credit for someone else's ideas, or clinging to old methods without being open to change. Of course, this list is not exhaustive.

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. There is no room for fraudulent activities (e.g. deceit, falsification of information, deliberate misuse of resources, etc). We interact on a fair basis with our customers and suppliers, competitors and other stakeholders. All transactions are free from bribes, kickbacks, gifts or favors. 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 organizations that are on the list of banned and undesirable persons/organizations.
Accepting cash, bribes, contributing to money laundering and corruption.*

OFFICIAL BUSINESS TRAVEL

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.

Not acceptable:

To ignore the rules of the travel policy while on official business or to behave in a manner that is not representative of Aeronamic, whether in meetings or during leisure time.

ENVIRONMENT

We take our environmental footprint very seriously and separate and recycle our waste as much as possible, thus taking better care of our living environment. Our business is organized keeping in mind the strict regulations with regard to hazardous substances and products. Before ordering these substances and products, we have actively searched for less invasive products and/or environmentally friendly alternatives. By doing so, we aim to contribute to the reduction of polluting of our living environment. We encourage all employees to use the available personal protective equipment to work safely. We actively monitor correct use and thus reduce dangerous situations on the work floor. We manage our energy consumption responsibly and thus strive to make a positive contribution to combating climate change.

Not acceptable:

*Not disposing hazardous waste according to regulations, as well as insufficiently separating waste and temporarily incorrect storage of chemicals.
Not using protective equipment.
Being inconsiderate of our environment.*



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