

CODE OF CONDUCT

A FRAMEWORK FOR ETHICAL, MORAL AND LEGAL BUSINESS CONDUCT





"Deutsche Aircraft is committed to the highest standards of ethical, moral and legal business conduct. The Code of Conduct sets down the standards we expect of both our employees and stakeholders. Illustrating these principles, the Code of Conduct identifies how to act with care, integrity, transparency and responsibility."

Dave Jackson

Chief Executive Officer



"The Code of Conduct serves as a directive for functions; establishing accountability and providing a comprehensive framework that should be cascaded down to all employees.

Everybody has the responsibility to uphold the principles enshrined herein and employees are encouraged to channel the awareness and training into their day-to-day business activities.

In the event that any employee or stakeholder becomes aware of any conduct, or other such serious and sensitive issues, that are deemed to be in violation of these principles, that person is encouraged to make a report. Management has a shared responsibility to create an environment in which an open dialogue can flourish."

Nico Neumann

Chief Executive Officer

Table of Contents

TABLE OF CONTENTS	
1. INTRODUCTION	5
Deutsche Aircraft Ethics and Compliance Organisation	6
Scope and Expectations of the Code of Conduct	7
Compliance with the Code of Conduct	7
Code of Conduct Colour Code	8
2. COMPLIANCE WITH LAWS	9
Anti-Corruption Laws and Bribery	10
Gifts, Illegal Payments and Business Courtesies	11
Competition and Antitrust	12
Fraud and Deception	13
Conflict of Interest	14
Import and Export Control	15
3. CORPORATE SOCIAL RESPONSIBILITY	16
Human Rights	17
Diversity and Inclusion	18
Prevention of Harassment	19
Protection of our Assets (Physical Assets and Intellectual Property)	20
Confidentiality	21
Data Privacy and Industrial Espionage	22
External Communication and Social Media	23
Transparency and Integrity of Information	24
Political Contributions	25
Facilitation Payments	26
Lobbying/Public Affairs	27
Charitable Donations	28
Insider Trading	29
International Trade and Money Laundering	30

Table of Contents

4. GOVERNANCE	31
Safety and Security	32
Environmental Protection and Sustainability	33
Contribution to the Community/Charitable Causes	34
5. PUTTING IT INTO PRACTICE	35
Ask Yourself the Right Questions	36
Speak Up!	37



1.

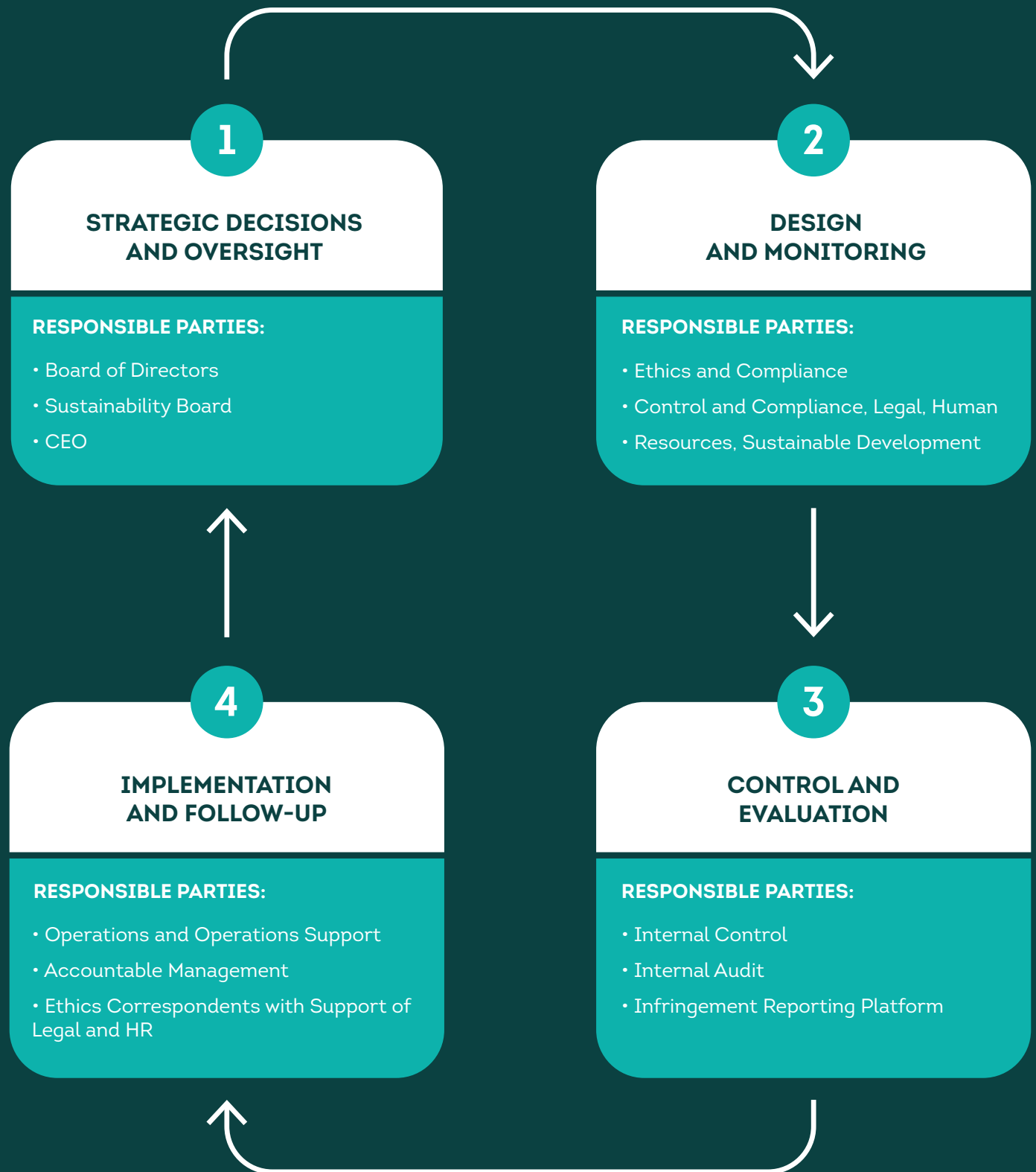
INTRODUCTION

DEUTSCHE AIRCRAFT ETHICS AND COMPLIANCE ORGANISATION

SCOPE, EXPECTATIONS AND COMPLIANCE

CODE OF CONDUCT COLOUR CODE

DEUTSCHE AIRCRAFT ETHICS AND COMPLIANCE ORGANISATION



SCOPE AND EXPECTATIONS OF THE CODE OF CONDUCT

The Code of Conduct applies to all employees, officers and directors at Deutsche Aircraft GmbH ("Deutsche Aircraft"). This Code of Conduct is part of the Deutsche Aircraft compliance programme which includes risk mapping, regular training and additional related policies. The principles in this Code of Conduct must be respected by everyone irrespective of their position.

Deutsche Aircraft promotes high ethical standards and aims to work with business partners who share our values. Deutsche Aircraft expects all business partners (contractors, suppliers, distributors, consultants, etc.) to comply with the principles of this Code of Conduct as well as the Supplier Code of Conduct, when applicable.

Within Deutsche Aircraft, the "stricter rule approach" should be followed. It means that when local law is stricter than the terms of this Code of Conduct, then local law must be implemented. When the terms of the Code of Conduct are stricter than local law, the Code of Conduct should apply. Nevertheless, if there is an irreconcilable difference between the Code of Conduct and local laws, local laws shall prevail over the Code of Conduct.

COMPLIANCE WITH THE CODE OF CONDUCT

All employees commit to abide by the terms of this Code of Conduct annually as part of the annual mandatory ethics training.

Anyone who violates the requirements of this Code of Conduct will be subject to disciplinary actions (up to and including dismissal) in compliance with internal rules and potentially to legal actions.

Prior to imposing any sanction, the manager of the entity should consult the Legal department and the Human Resources department and inform them of the disciplinary measures considered.



CODE OF CONDUCT COLOUR CODE



CONDUCT WITH OTHERS WITHIN THE COMPANY

Conduct with others within the company refers to the conduct of Deutsche Aircraft employees between one another.

Please refer to pages: 14, 17, 18, 19, 22, 25, 32.



CONDUCT WITH EXTERNAL STAKEHOLDERS

Conduct with external stakeholders refers to the conduct of Deutsche Aircraft employees with all types of external persons, including but not limited to suppliers, consultants, advisors, sales agents, subcontractors, politicians, government officials and distributors.

Please refer to pages: 10, 11, 12, 13, 15, 17, 21, 25, 26, 27, 28, 29, 30, 33, 34.



CONDUCT WITH THE COMPANY

Conduct with the company refers to the conduct of Deutsche Aircraft employees with company policy and business partners.

Please refer to pages: 13, 14, 15, 20, 21, 22, 23, 24, 29, 32, 33, 34.

COMPLIANCE WITH LAWS

2.

1. ANTI-CORRUPTION LAWS AND BRIBERY
2. GIFTS, ILLEGAL PAYMENTS AND BUSINESS COURTESIES
3. COMPETITION AND ANTITRUST
4. FRAUD AND DECEPTION
5. CONFLICTS OF INTEREST
6. IMPORT AND EXPORT CONTROL

ANTI-CORRUPTION LAWS AND BRIBERY

Certain types of intermediaries (consultants, advisors, sales agents, distributors, governmental officials, etc.) carry significant corruption risk and should therefore be used only when it is absolutely necessary. Precautions have to be taken before and during the business relationship.

WHAT DO I NEED TO KNOW?

- Deutsche Aircraft performs its obligations and activities in its relationship with its employees and stakeholders in full compliance with applicable anti-corruption laws and regulations.
- Bribes made indirectly through intermediaries may result in the same legal exposure to Deutsche Aircraft and its employees as if they had been made directly.
- Deutsche Aircraft, its directors and its employees can be held liable for bribes or other payments made by their intermediaries, even if those payments were not approved, or even known, by the company.
- Deutsche Aircraft has issued procedures on the selection and use of intermediaries to mitigate such risks.

WHAT AM I EXPECTED TO DO?

Make sure that there is a legitimate need for an intermediary and that no internal resource could achieve the same outcome.

Perform a thorough due diligence screening on the reputational background and qualifications of the intermediaries (including their shareholders) prior to entering into or renewing a business relationship.

Ensure that the contract between Deutsche Aircraft and the intermediary clearly prohibits any corrupt behaviour and that fees paid are consistent with services rendered.

FOR EXAMPLE

IN THIS SITUATION...

Deutsche Aircraft is participating in a tender for a major project in a new country.

An intermediary offers support, claiming that they can ensure that Deutsche Aircraft wins the tender, hinting that they may need to pay a commission to the appropriate decision-makers.

WHAT SHOULD YOU DO?

You should refuse the proposal and terminate the relationship because this offer conflicts with Deutsche Aircraft's policy and Code of Conduct.

The incident must be reported to management for further action.

SITUATIONS TO WATCH OUT FOR:

Do not approve invoices without proof that the service has been rendered and without existing detailed documentation.

Never ask intermediaries to do something you would not do yourself.

Never authorise subsidies/donations to be made on behalf of Deutsche Aircraft by the intermediary.

GIFTS, ILLEGAL PAYMENTS AND BUSINESS COURTESIES

The offer or receipt of reasonably priced gifts and hospitality are a normal part of business. However, if they are offered or received with the intention of obtaining an improper advantage, this constitutes corruption.

WHAT DO I NEED TO KNOW?

- A "gift" includes cash or any type of entertainment, gift cards, product discounts and non-business activities that have a fiscal value.
- The reasonableness, timing and frequency of gifts and hospitality remain the key criteria as to finding the right balance between maintaining good business relationships and complying with our legal and ethical commitments.

WHAT AM I EXPECTED TO DO?

If I offer or receive gifts or hospitality, I should ask myself the following questions:

- ? What is the approximate value of the gift or hospitality? Is it reasonable?
- ? Would I make the same decision if this gift or hospitality was made public?

Before a gift or invitation is offered or accepted, I should refer the question to Human Resources and Supply Chain.

FOR EXAMPLE

IN THIS SITUATION...

You are negotiating an important contract with three shortlisted suppliers.

During the discussions, one of the suppliers discovers that you support the same football team as them and offers you a ticket for the next game in a VIP lodge.

WHAT SHOULD YOU DO?

As the bidding period timing is inappropriate and the invitation value is high, you should refuse this offer as it could be seen as an attempt to secure the supply contract in exchange for an improper advantage.

Report this attempt to your manager.

SITUATIONS TO WATCH OUT FOR:

Providing a potential supplier with gifts in exchange for a competitive offer.

Giving or receiving gifts in cash or cash equivalent (e-cards, gift cards, etc.).

Never authorise subsidies/donations to be made on behalf of Deutsche Aircraft by the intermediary.

COMPETITION AND ANTITRUST

Offering the best products and services through free and fair competition is key to our success. We are committed to competing fairly and in compliance with applicable competition laws.

WHAT DO I NEED TO KNOW?

- Competition laws apply to many different kinds of business relationships; including negotiations with clients and suppliers, contacts with competitors, marketing and sales or Merger & Acquisition (M&A) transactions.
- In case of breach of competition law, most countries or regions around the world provide for severe sanctions for both individuals and legal entities. These sanctions may seriously damage Deutsche Aircraft's reputation.

WHAT AM I EXPECTED TO DO?

I am aware of and understand that the following practices are prohibited:

- Any agreement or discussion with competitors concerning price fixing, colluding, allocating markets or customers or bid rigging.
- Any exchange of current, recent or future pricing information with competitors.
- The abuse of a dominant position held in a relevant market (such as discriminatory practices, predatory pricing, tied sales, etc.).

I am vigilant when communicating with competitors and I avoid language in verbal or written communication that could be misinterpreted by any person or company.

FOR EXAMPLE

IN THIS SITUATION...

At a conference, a competitor tells you their intention to increase the price of a certain product by 10% and ask you if your entity will align with their new price.

WHAT SHOULD YOU DO?

Competitors should not share information about their pricing strategy. Immediately tell your counterpart that their comments and questions are inappropriate and leave.

You should report the conversation to your supervisor.

EXAMPLES OF PROHIBITED BEHAVIOR:

Taking part for examples aimed at eliminating or excluding competitors or potential competitors from the market.

Sharing sensitive information with a competitor.

Engaging in illegal or unethical behaviour in order to obtain information on competitors.

FRAUD AND DECEPTION

Deutsche Aircraft acts with integrity in all of its dealings and must not act fraudulently, deceive people or make false claims by defrauding, stealing or misappropriating property or information.

WHAT DO I NEED TO KNOW?

- Fraud can involve asset misappropriation, vendor fraud, accounting fraud, payroll fraud and data theft.
- Deception can involve the intentional misrepresentation or nondisclosure with an intent to deceive.
- Any suspected wrongdoing by an employee will be investigated and reported to the appropriate authorities.

WHAT AM I EXPECTED TO DO?

I must not engage in fraud in connection with any Deutsche Aircraft related affairs.

I must never use deception to obtain competitive intelligence.

I must report any suspected fraud to my manager or via the whistleblowing platform.

Ask yourself the following questions for all transactions:

- ? What is being delivered?
- ? Who will receive the delivery?
- ? Where is it being delivered?
- ? Has it been delivered?

FOR EXAMPLE

IN THIS SITUATION...

My colleague has not been seen in the office for several days but is neither on sick leave nor on holiday?

WHAT SHOULD YOU DO?

Get in touch with the supervisor and/or HR to get clarity on the situation.

EXAMPLES OF PROHIBITED BEHAVIOR:

Timesheet fraud, payroll fraud, vendor fraud, data theft, etc.

CONFLICT OF INTEREST

Deutsche Aircraft respects the personal interests and private lives of its employees. Nevertheless, it is important to avoid conflicts between Deutsche Aircraft's interests and one's personal interests by reporting any commitment or relationship that could potentially create such a conflict.

WHAT DO I NEED TO KNOW?

- A conflict of interest arises when a personal interest could interfere with Deutsche Aircraft's interest and potentially affect one's judgment (e.g., award a contract to a company in which the employee is a shareholder or where there could be a case of nepotism).
- An undisclosed conflict of interest may give an appearance of favouritism and as such, damage the Deutsche Aircraft's reputation and business interests.

WHAT AM I EXPECTED TO DO?

I avoid situations that could potentially create conflicts of interest, or the appearance of conflicts, between my personal and professional life.

I will not agree to engage in any paid or unpaid work for a supplier, customer or competitor.

I promptly disclose any existing or potential conflict of interest to my manager and refrain from any involvement in relations between the Deutsche Aircraft and the third party concerned.

FOR EXAMPLE

IN THIS SITUATION...

A job offer is posted with very specific qualifications. You are the manager in charge of the recruitment and one of the applicants is a relative.

You think that you can be objective when selecting candidates and that you are capable of making a selection without being influenced by your personal relationships.

WHAT SHOULD YOU DO?

You must disclose to your manager or the Human Resources manager that you are related to the candidate and remove yourself from the selection process in order to ensure that all the candidates are treated fairly and objectively.

Being involved in this decision could appear as favouritism and could negatively impact both yours and Deutsche Aircraft's reputation.

EXAMPLES OF POTENTIAL CONFLICTS OF INTEREST:

Using any Deutsche Aircraft property or resources for personal use.

Being involved in Deutsche Aircraft business transactions with third parties in which you or your relatives have a personal interest – financial or otherwise.

IMPORT AND EXPORT CONTROL

Deutsche Aircraft endeavours to adhere to import and export trade control laws and regulations.

WHAT DO I NEED TO KNOW?

- Deutsche Aircraft ensures that its business practices comply with the applicable laws, directives and regulations that govern the import of parts, components and technical data services.
- Deutsche Aircraft ensures that its business practices comply with Export Control laws, provide accurate export control classification and obtain export control licenses and authorisations.

WHAT AM I EXPECTED TO DO?

I comply with all international and national sanctions and embargoes.

I contact the Export Control team before starting new projects that could involve entities from sensitive jurisdictions.

I always verify that all information provided by vendors is accurate.

FOR EXAMPLE

IN THIS SITUATION...

You start a project with a tight deadline that involves the screening of several companies against sanction lists in order to verify that each company is not a sanctioned or embargoed entity. Your manager has advised you to skip the screening process so as to save time.

WHAT SHOULD YOU DO?

You should not skip the required screening process as Deutsche Aircraft's Export Control Guidelines are in place to ensure that Deutsche Aircraft is operating in full compliance with applicable export control laws and regulations.

You should report this issue to Export Control and make a report via the whistleblowing platform.

EXAMPLES OF PROHIBITED BEHAVIOR:

Never disclose export/import-controlled information without authorisation.

CORPORATE SOCIAL RESPONSIBILITY

3.

1. HUMAN RIGHTS
2. DIVERSITY AND INCLUSION
3. PREVENTION OF HARASSMENT
4. PROTECTION OF DEUTSCHE AIRCRAFT'S ASSETS
5. CONFIDENTIALITY
6. DATA PRIVACY
7. EXTERNAL COMMUNICATION AND SOCIAL MEDIA
8. TRANSPARENCY AND INTEGRITY OF INFORMATION
9. POLITICAL CONTRIBUTIONS
10. FACILITATION PAYMENTS
11. LOBBYING / PUBLIC AFFAIRS
12. CHARITABLE DONATIONS
13. INSIDER TRADING
14. INTERNATIONAL TRADE AND MONEY LAUNDERING

HUMAN RIGHTS

Deutsche Aircraft respects and promotes human rights in its operations around the world. We strongly believe that all persons should be treated with respect and dignity and that companies should play a role in protecting these fundamental human rights.

WHAT DO I NEED TO KNOW?

- Deutsche Aircraft fully supports the protection of human rights, including but not limited to, health, security and safety, non-discrimination, freedom of opinion, expression and association, working under decent and fair conditions and the prohibition of child labour and any form of modern slavery.
- Deutsche Aircraft promotes continued learning and the development of competencies throughout a professional career.

WHAT AM I EXPECTED TO DO?

I ensure that human rights are respected in my area of responsibility and ensure my business partners abide by such standards.

FOR EXAMPLE

IN THIS SITUATION...

You receive information that employees of one of our suppliers are exposed to particularly unsafe working conditions.

WHAT SHOULD YOU DO?

You should inform your manager and/or the persons responsible for procurement.

Deutsche Aircraft will investigate this business partner and depending on the results of the investigation, will take the necessary measures that could include requesting a corrective action plan or terminating the relationship.

EXAMPLES OF PROHIBITED BEHAVIOUR:

It is prohibited to work with subcontractors who do not comply with Deutsche Aircraft's requirements, or local legislation if they are stricter, related to employee safety and security.

DIVERSITY AND INCLUSION

Deutsche Aircraft promotes diversity and equal opportunities for career development regardless of race, caste, ethnic or national origin, citizenship status, religion, age, disability, sex, gender identity, marital status, sexual orientation or preference, union membership, political affiliation or any other personal characteristics.

WHAT DO I NEED TO KNOW?

- Deutsche Aircraft grants every employee an equal opportunity to progress and make the most of their talents.
- Deutsche Aircraft is committed to providing an inclusive environment for all employees.

WHAT AM I EXPECTED TO DO?

I assess candidates for recruitment as well as supervised employees on the basis of merit and actions directly related to their professional skills and performance.

I treat everyone with whom I have a professional relationship with dignity and respect and I do not engage in offensive, intimidating or discriminatory conduct.

I play an active role in creating an inclusive environment in which different backgrounds and viewpoints are taken into account and valued.

FOR EXAMPLE

IN THIS SITUATION...

A training has been made available to a selected few of my colleagues. This limits my growth and inhibits my ability to develop myself in a key area.

WHAT SHOULD YOU DO?

Raise your concern with your line manager in order to understand what the selection criteria has been. Discuss the relevance and your fit based on merit and capabilities.

If the line manager does not support an inclusive environment, you should raise this concern with HR.

EXAMPLES OF UNACCEPTABLE BEHAVIOUR:

Some colleagues are excluded from social events because they come from a different cultural background.

A manager acting dismissively and humiliating members of their team.

PREVENTION OF HARASSMENT

Deutsche Aircraft provides its employees with an employment environment that is absent of any physical, psychological, sexual and verbal harassment, intimidation, retaliation or other abusive conduct.

WHAT DO I NEED TO KNOW?

- Deutsche Aircraft takes a zero-tolerance approach to discrimination and harassment of any form.
- Harassment is any unwelcome conduct that creates an intimidating, hostile, degrading, humiliating or offensive work environment.
- Harassment does not need the intent to offend and can take the form of a joke, a prank or a compliment.
- Deutsche Aircraft supports and promotes a workplace free from any form of harassment, including bullying, sexual harassment, violence or any action that creates a threatening workplace.

WHAT AM I EXPECTED TO DO?

I report any instances of discrimination or harassment that I have witnessed to Human Resources or the whistleblowing platform.

I am mindful of how my own conduct might be acceptable to some cultures, backgrounds or perspectives, but not to others.

FOR EXAMPLE

IN THIS SITUATION...

A new colleague has joined your department. You have tried to make them feel welcome but they seem to have taken it the wrong way.

They keep asking you out on a date and making embarrassing comments. Despite politely telling them that you are not interested, they are persisting.

You now feel uncomfortable in their presence.

WHAT SHOULD YOU DO?

As your colleague's conduct could be regarded as harassment and you should take the matter to your manager or to HR. Alternatively, you can file a report via the Infringement Reporting Platform.

Deutsche Aircraft will ensure that you will be protected from any adverse consequences arising from reporting the incident.

EXAMPLES OF PROHIBITED BEHAVIOUR:

Insulting, intimidating, demeaning, annoying, embarrassing or otherwise offensive behaviour.

Inappropriate or unwelcome focus or comments on a persons' physical characteristics or appearance.

PROTECTION OF OUR ASSETS (PHYSICAL ASSETS AND INTELLECTUAL PROPERTY)

As an innovation-oriented company, Deutsche Aircraft's assets consist of physical assets, technologies, inventions and know-how. Our assets should be used with a high level of care and only for business-related purposes.

WHAT DO I NEED TO KNOW?

- Deutsche Aircraft protects innovation developed at Deutsche Aircraft through intellectual property rights (such as but not limited to patents and trademarks) in order to prevent it from being improperly appropriated by others.
- Damaging, stealing or wasting company assets, as well as violating intellectual property rights, has a negative impact on Deutsche Aircraft's operational and financial performance and on the company's reputation.

WHAT AM I EXPECTED TO DO?

I protect Deutsche Aircraft's assets and resources against any damage, alteration, fraud, loss or theft.

I declare any innovations or inventions made with company assets or resources to my employer.

I respect the intellectual property rights of third parties.

I use Deutsche Aircraft's assets and resources for legitimate business purposes only and within the framework set by the Deutsche Aircraft's entities policies.

FOR EXAMPLE

IN THIS SITUATION...

A start-up contacts you and offers to discuss an innovative technical solution that they would like to propose for future collaboration.

Deutsche Aircraft has been working on a similar Research and Technology (R&T) project.

WHAT SHOULD YOU DO?

Prior to any discussion with a third party, and to avoid future conflicts on intellectual property, you should make sure that Deutsche Aircraft's information has been protected and check if theirs has been protected as well.

With the support of the legal representatives, be sure to have the appropriate contractual framework in place before exchanging any sensitive information (e.g. a non-disclosure and confidentiality agreement).

EXAMPLES OF ASSETS TO PROTECT:

Technical inventions, confidential know-how and design (drawings, physical appearance of products, jigs and tools, type certificate related information, etc.).

Trademarks, names and logos under which we do business.

Facilities, spare parts and offices.

CONFIDENTIALITY

In an increasingly digitised environment, preserving the business information of our company and of our partners relies on the responsibility and vigilance of us all.

WHAT DO I NEED TO KNOW?

- Confidential information is information that is not public and is related to our activities and/or our business partners' activities.
- Confidential information includes both technical and business-related information.
- Deutsche Aircraft takes, and expects its employees to take, relevant measures to protect confidential information concerning the Deutsche Aircraft, its clients and any other business partners in compliance with internal procedures.

WHAT AM I EXPECTED TO DO?

I protect and maintain the confidentiality of non-public data and documents of a strategic, financial, technical or commercial nature.

I disclose confidential information internally only on a need-to-know basis.

I ensure non-disclosure agreements (NDAs) are in place with any given entity before exchanging confidential information.

I require business partners to keep the information provided by Deutsche Aircraft confidential, in particular by entering into confidentiality agreements. Likewise, I strictly abide by any contractual commitment on confidentiality made to a client or any other business partner.

I understand that my obligation to maintain confidentiality continues even after I leave Deutsche Aircraft.

FOR EXAMPLE

IN THIS SITUATION...

You regularly travel for work with colleagues by train or by plane.

You often plan to use the time spent in public transportation to work and prepare upcoming meetings. You realise that some of these sensitive conversations may be overheard by members of the public.

WHAT SHOULD YOU DO?

When working away from your site, office or home office, you should pay close attention to ensure that you are keeping confidential information from leaking.

In public areas you should not work on confidential matters, nor mention the name of individuals or companies (Deutsche Aircraft, the clients or business partners).

EXAMPLES OF PROHIBITED BEHAVIOUR:

Not protecting my passwords or giving my passwords to others, including colleagues, team members, co-workers, etc.

Handling sensitive data without adequate protection (e.g., encryption, use of secured email, approved virtual private network (VPN), using privacy screens in public places).

Taking away or copying any confidential information, in particular when my employment contract ends.

DATA PRIVACY AND INDUSTRIAL ESPIONAGE

Each individuals' right to privacy is a key concern for Deutsche Aircraft. We are committed to taking the necessary measures to provide protection when handling employees', business partners' or any other person's personal data.

WHAT DO I NEED TO KNOW?

- Personal data is any data that can directly or indirectly (when linked with other data) lead to the identification of a person.
- Deutsche Aircraft processes personal data (i.e., collecting, storing, using, transferring, displaying and deleting) strictly in accordance with applicable laws and regulations.
- Personal data must be collected for a specific purpose, be shared only with those who legitimately need to access it and be securely stored.
- Industrial espionage is the illegal and unethical theft of business trade secrets for use by a competitor to gain a competitive advantage.

WHAT AM I EXPECTED TO DO?

I make sure I handle personal data as required under the applicable law and our internal procedures, especially before disclosing it outside Deutsche Aircraft.

I report immediately any leak of personal data to my manager, HR and/or report it via the Infringement Reporting Platform.

FOR EXAMPLE

IN THIS SITUATION...

A business partner asks for the personal addresses of your colleagues to send them a sample of their latest product.

You think your colleagues would like the thought, but you are not sure whether you are permitted to share this information.

WHAT SHOULD YOU DO?

The names and personal addresses of employees constitute personal data that, depending on local law, you may only be allowed to share under certain circumstances.

Before you share such information, you need to check with HR if and how you can proceed.

EXAMPLES OF PROHIBITED BEHAVIOUR:

Retaining personal data for longer than is necessary or allowed.

Disclosing private information regarding employees.

Gaining employment at Deutsche Aircraft for the purpose of spying and stealing information for a competitor.

EXTERNAL COMMUNICATION AND SOCIAL MEDIA

Deutsche Aircraft is committed to open and reliable communication with all of its stakeholders. Every employee should contribute to the protection and promotion of Deutsche Aircraft's reputation through careful and professional behaviour when handling external communication and social media.

WHAT DO I NEED TO KNOW?

- Deutsche Aircraft takes great care to ensure the quality and accuracy of the information communicated to all stakeholders, including the media, business partners and the capital markets.
- All employees share a collective responsibility for Deutsche Aircraft's reputation and image.
- All external communications must be approved by the Communications department.

WHAT AM I EXPECTED TO DO?

I do not answer questions or make a commitment on behalf of Deutsche Aircraft if I am not specifically authorised by the company to do so. If the media contacts me, I refer it to my manager who should review the matter with the relevant Communications department.

I should act with common sense and professionalism when using personal social media via online posting or any form of public communications with regard to my job, Deutsche Aircraft or my working environment.

If I wish to, I can share Deutsche Aircraft official communications on my personal social media accounts (press releases, deutscheaircraft.com web articles, official social media posts from Deutsche Aircraft, job offers).

If I am invited to speak externally on a subject related to my work, I should first consult my manager who can review the matter with the relevant Communications department.

FOR EXAMPLE

IN THIS SITUATION...

An incident happened at a Deutsche Aircraft industrial site. You see a lot of comments from people on social media.

Some of the comments seem to be incorrect and you think that they could damage Deutsche Aircraft's reputation.

You want to set things straight by posting your own comment.

WHAT SHOULD YOU DO?

You should refrain from posting any comment as you are not authorised to speak on behalf of the company.

However, you should refer the matter to the Communications department so that they can prepare an appropriate response if needed.

EXAMPLES OF PROHIBITED BEHAVIOUR:

Sharing sensitive information on social media (whether concerning a project, a customer or Deutsche Aircraft).

Disclosing sensitive information through answers to external consulting firm inquiries or polls.

TRANSPARENCY AND INTEGRITY OF INFORMATION

Communicating transparent and reliable business information, financial and non-financial, is key to maintaining trust with all our stakeholders.

WHAT DO I NEED TO KNOW?

- Financial reporting accuracy is a responsibility shared by all as it includes a variety of documents such as accounting books, financial records, contracts, receipts, invoices and expense accounts.
- Deutsche Aircraft has implemented a strong internal control system contributing to the reliability of information.
- Inaccurate business or financial information reporting could seriously damage Deutsche Aircraft's performance and reputation.

WHAT AM I EXPECTED TO DO?

I carry out any analysis, filing or communication of business and financial information with great care, honesty and transparency and in line with our internal accounting and record-keeping processes.

Every transaction should be properly documented and reported in a timely and accurate manner, in line with the Deutsche Aircraft's accounting principles.

I contribute to the effectiveness of the internal control system and cooperate with internal or external audits, especially by showing diligence and transparency.

FOR EXAMPLE

IN THIS SITUATION...

You are reviewing the financial records of the quarter, and you notice that many substantial invoices from a particular supplier have been recorded.

You decide to check on the transactions involved and the identity of the supplier. You find that the company is indeed registered in the supplier's database but the invoices do not match the services provided.

WHAT SHOULD YOU DO?

You may be dealing with false invoices that could indicate a fraud scheme.

You should immediately report it via the Infringement Reporting Platform for further investigation.

EXAMPLES OF PROHIBITED BEHAVIOUR:

Intentionally booking incomplete or wrong information.

Submitting inaccurate or inflated travel and entertainment reimbursement requests.

Deliberately underestimating (e.g., CO2 emissions, accident rate, cost of goods) or overestimating (e.g., sales, margins) key performance indicators in Deutsche Aircraft internal or external reporting.

POLITICAL CONTRIBUTIONS

Some specific operations carry risks, in particular from a corruption perspective, and therefore require extra vigilance. Examples of such operations are listed below.

WHAT DO I NEED TO KNOW?

Deutsche Aircraft only makes political contributions in very specific situations when permitted by local law and duly approved.

WHAT AM I EXPECTED TO DO?

I refer any third parties' request for a political donation to my manager.

I separate my personal political activities from my professional activities within the Deutsche Aircraft.

EXAMPLES OF PROHIBITED BEHAVIOUR:

Making political contributions at a customer's request to secure a contract.

Referring to one's position at Deutsche Aircraft for my personal political activity.

Using funds or other assets of the Deutsche Aircraft for personal political activities.

FACILITATION PAYMENTS

WHAT DO I NEED TO KNOW?

A facilitation payment is generally a relatively small cash payment made to a public official to influence the official to speed up an administrative process.

WHAT AM I EXPECTED TO DO?

I should decline any request to pay a facilitation payment and inform my manager of any solicitation.

EXAMPLES OF FACILITATION PAYMENTS:

They include fees to facilitate or expedite processes such as:

Obtaining a preferential treatment from regulators.

Speeding up the obtention of permits, licenses, visas or other official documents.

LOBBYING/PUBLIC AFFAIRS

WHAT DO I NEED TO KNOW?

Lobbying refers to the situation where a person or entity seeks to influence the decisions of a public authority. Lobbying is often regulated by local law. Care has to be undertaken as lobbying can be perceived as an act of corruption.

WHAT AM I EXPECTED TO DO?

When promoting Deutsche Aircraft's interests with public decision makers, I conduct my activities with integrity and transparency under the responsibility of the entity's Managing Director. I consult with the local or the Deutsche Aircraft's Communications department in advance.

I undertake a due diligence review before appointing a lobbying firm, including its directors and shareholders, and I request approval from the relevant Public Affairs department. I then follow-up rigorously on the performance of the services.

EXAMPLES OF PROHIBITED BEHAVIOUR:

Failing to disclose the lobbying company's mandate to authorities when required.

Compensating a lobbying firm with fees which are not reasonable and appropriate in light of the services provided.

CHARITABLE DONATIONS

WHAT DO I NEED TO KNOW?

A charitable donation is something of value given by Deutsche Aircraft to an organisation to help it accomplish its goals without anything expected in return.

Deutsche Aircraft may support associations under the condition that the donations validation process is respected.

WHAT AM I EXPECTED TO DO?

I perform the necessary due diligence checks on the quality, reputation and purpose of the charity,

I obtain the appropriate approval.

EXAMPLES OF PROHIBITED BEHAVIOR:

Making donations to charitable organisations in order to influence public officials or third-parties in providing the company with undue advantages.

Concealing the donation in the company's accounts.

INSIDER TRADING

WHAT DO I NEED TO KNOW?

Insider trading takes place when a person directly or indirectly carries out transactions using insider information.

Insider information is information of a precise nature that has not been made public and that, if it were made public, would be likely to significantly affect the price of the financial instruments of a listed company (e.g., equity, bonds).

Insider information could include financial results, acquisition, merger, divestment, major contract, litigation or an investigation.

WHAT AM I EXPECTED TO DO?

I follow the applicable laws and internal policies related to the prevention of insider trading.

I am vigilant with information on any publicly traded business partners as the insider trading prohibition is not limited to Deutsche Aircraft.

If I have insider information, I must keep this information confidential and must not undertake myself, or recommend to a third party (e.g., family members, colleagues), to trade Deutsche Aircraft shares or other securities.

EXAMPLES OF PROHIBITED BEHAVIOUR:

Using confidential information overheard (e.g., open meeting room, paper left on a printer).

Suggesting to a family member or a friend that they should purchase shares based on insider information, even if you do not stand to gain financially yourself.

INTERNATIONAL TRADE AND MONEY LAUNDERING

WHAT DO I NEED TO KNOW?

International trade laws may impose prohibitions or restrictions on transactions or may require approval from authorities or other monitoring methods on the cross-border exchange of goods.

Suspicious transactions may be associated with money laundering practices that consist of hiding the fraudulent origins of funds (mafia organisation, drug trafficking, weapon trafficking, extortion, corruption, etc.), and then reinvesting the “dirty money” in legal activities.

Deutsche Aircraft undertakes to respect applicable international trade sanctions, embargoes and export controls targeting countries, companies or individuals.

WHAT AM I EXPECTED TO DO?

I perform the appropriate due-diligence review prior to starting a new relationship with any cross-border business partner.

I am vigilant and report any suspicious financial operation to my manager and/or make a report via the Infringement Reporting Platform.

EXAMPLES OF PROHIBITED BEHAVIOUR:

A supplier refusing to provide official documents or data.

A supplier requiring payment made in an unusual manner (e.g., to a bank account in an unrelated country, following an unusual scheme, etc.), or to an unrelated company or person.

4.

GOVERNANCE

1. SAFETY AND SECURITY
2. ENVIRONMENTAL PROTECTION AND SUSTAINABILITY
3. CONTRIBUTION TO THE COMMUNITY/CHARITABLE CAUSES

SAFETY AND SECURITY

Ensuring a safe and secure work environment for all our employees and partners is Deutsche Aircraft's priority. With the possibility of impacting people, their health and their lives, Deutsche Aircraft's ambition is to have zero accidents.

WHAT DO I NEED TO KNOW?

- Every employee has the right to work in a safe and secure working environment.
- Deutsche Aircraft has developed safety (prevention of industrial risks) and security (prevention of risks related to malicious events) policies, standards and procedures that apply to employees, subcontractors and service providers where Deutsche Aircraft operates.
- When working at a third party's site, an employee should also be aware of and comply with the third party's safety and security rules.

WHAT AM I EXPECTED TO DO?

Deutsche Aircraft ensures the safety and quality of its products and services and promotes them responsibly.

I adhere to applicable laws, regulations and all related Deutsche Aircraft policies designed to ensure safe and secure working conditions.

I participate in safety training and follow all applicable emergency procedures in case of serious incidents (fires, attacks, etc.).

I promptly report all potential hazards, unsafe practices or installations and safety or security incidents to my manager.

FOR EXAMPLE

IN THIS SITUATION...

During your rounds, you see that the machine safeguard of a rotating part has not been replaced.

The machine is running and there is a risk of something or somebody getting caught.

Nevertheless, it is complicated to correct the situation without stopping the equipment and causing a risk of shortage for the customer.

WHAT SHOULD YOU DO?

Safety is the priority and you should immediately put up signs to warn about the risk and then inform your manager so that actions can be taken to secure the area.

This means, if necessary, stopping the equipment to fix the guard, putting another barrier around the equipment, limiting access to the area, etc.

EXAMPLES OF UNSAFE SITUATIONS:

Smoking in non-designated areas - such as near a flammable products (hydrogen, acetylene, oil, etc.) storage or venting area.

Not wearing Personal Protective Equipment (PPE). It can cause serious injuries, diseases or even death.

Not following security rules when travelling, especially in a sensitive country.

ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

The protection of the environment is at the heart of our values. To address climate change, Deutsche Aircraft is committed to a sustainable future.

WHAT DO I NEED TO KNOW?

Deutsche Aircraft is committed to minimising its impact on the environment by:

- Optimising energy resources and waste discharge.
- Implementing responsible purchasing policies, including the Deutsche Aircraft Supplier Code of Conduct.
- Applying technologies to reduce the carbon footprint of Deutsche Aircraft and its customers.
- Proposing energy transition solutions for a low-carbon society.

In full support of the 2015 Paris Agreement, Deutsche Aircraft's climate commitments address the urgency of climate change and energy transition.

Deutsche Aircraft is committed to implementing eight of the seventeen Sustainable Development Goals set down by the United Nations:

- Quality Education.
- Affordable and Clean Energy.
- Gender Equality.
- Decent Work and Economic Growth.
- Industry, Innovation and Infrastructure.
- Responsible Consumption Production.
- Climate Action.
- Partnerships for the Goals.

WHAT AM I EXPECTED TO DO?

I consider how my work and my actions affect the environment in order to limit their impact wherever possible.

I behave responsibly regarding the environment. I can contribute to the Sustainability Board network by sharing my ideas with the relevant representatives and furthering Deutsche Aircraft's sustainability goals.

FOR EXAMPLE

IN THIS SITUATION...

You have some ideas that you would like to share that impact sustainability within the company.

As it does not link directly to developing and producing a sustainable aircraft, you are not sure whether to bring this idea forward.

WHAT SHOULD YOU DO?

All ideas are welcome at Deutsche Aircraft. Sustainable ideas can span environmental, social and governance goals and need not be linked solely to producing a sustainable aircraft.

You can speak directly with your department's Sustainability Board representative or discuss becoming your department's representative at the Sustainability Board with your manager.

Alternatively, you can consult the Sustainability Intranet and find the contact person to bring your idea to.

EXAMPLES OF ENVIRONMENTALLY CONSCIOUS BEHAVIOUR:

Correctly managing assets (e.g., recycling, disposal) at their end of life.

Ensuring that equipment and processes you are using comply with the relevant environmental regulations and/or requirements.

Discharging (chemical) waste in designated streams and observing waste separation practices.

CONTRIBUTION TO THE COMMUNITY/CHARITABLE CAUSES

Deutsche Aircraft has continuously been working to combine growth with concern for the environment and society. We contribute to inventing and shaping a sustainable future through our environmental and societal actions.

WHAT DO I NEED TO KNOW?

Deutsche Aircraft takes on local initiatives that focus in particular on protecting life and the environment and developing local communities while respecting their culture and their rights.

WHAT AM I EXPECTED TO DO?

I establish courteous and open relationships with local communities.

I can suggest local initiatives.

I follow the rules related to donations and avoid any actual or perception of a conflict of interest.

FOR EXAMPLE

IN THIS SITUATION...

You are involved in a non-profit organisation promoting the access to employment for disadvantaged young adults. This organization needs funds to implement its programmes and is willing to organise events such as site visits or mentor programmes.

You believe in this mission and you would like to further support this organisation.

WHAT SHOULD YOU DO?

You could discuss this project with your manager, who can check if this request is in line with Deutsche Aircraft's policy and compliance rules.

PUTTING IT INTO PRACTICE

5.

1. ASK YOURSELF THE RIGHT QUESTIONS
2. SPEAK UP!

ASK YOURSELF THE RIGHT QUESTIONS

In case you cannot find an answer to your ethical question, please use this self-test guide prior to taking any decision.

1. Did I in good faith take into account all the risks and consequences of my action?
2. Is this action in compliance with the law?
3. Is it in compliance with Deutsche Aircraft's Code of Conduct or other relevant internal guidelines and procedures?
4. Does this action have any negative impact on Deutsche Aircraft or its stakeholders?
5. Would I be worried about a public disclosure of my action?

Contacts for Ethical Questions

In case of any questions or doubts about this Code of Conduct, please refer to Deutsche Aircraft's HR Team

SPEAK UP!

PUTTING INTO PRACTICE

Any person who is aware of inappropriate behaviour falling within the scope of this Code of Conduct or applicable laws, is encouraged to report it.



The Infringement Reporting Platform

The Infringement Reporting Platform is an alert system that is available 24/7 and is open to any employee as well as stakeholder who would like to file an alert. The platform, managed by an external service provider, is secure and access rights are limited to personnel authorised to receive or process alerts.

How to File an Alert

- You can use the internet to make a written or verbal report.
- After the registration of the alert, as an acknowledgement of receipt, you will get a unique username and secure password. Keep them in a safe place as they will allow you to follow the progress of your report.
- The report will be registered and transmitted to the relevant person in Deutsche Aircraft for further investigation.
- Further questions could be asked to you in order to properly conduct the investigation.
- Feedback on the investigation will be given to you as soon as the investigation has been completed.

