



AEROTEH S.A.

Bucharest

Romania

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**CODE OF BUSINESS
ETHICS**



AEROTEH S.A. Bucharest, Romania
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AEROTEH S.A. Code of Business Ethics

- Implementation of Principles for a Sustainable Future -

1. Foundation of Ethics and Sustainable Development Documents

1.1. Key Documents

Three documents form the backbone of ethics and sustainable development at AEROTEH S.A.:

- *'AEROTEH S.A. Business Ethics Policy - Ethics is the Foundation of Sustainable Success'*, which establishes the theoretical foundation. The ethics policy expresses the principles of sustainable development the top management of AEROTEH S.A. adheres to.
- *'AEROTEH S.A. Code of Business Ethics - Implementations of Principles for a Sustainable Future'*, which is the practical tool that helps implement these principles in daily behaviour and business decisions. The code of ethics expresses the expectations that the top management of AEROTEH S.A. has them from the Company's employees, bringing to the fore the need for their adherence to the principles of sustainable development and corporate social responsibility.
- *'Business Ethical Conduct Guidelines for AEROTEH S.A. Employees'*. The ethical conduct guidelines specify the situations in which the employees of AEROTEH S.A. must act according to the *'AEROTEH S.A. Code of Business Ethics'* and the consequences of not complying with the Company's rules in the field of sustainable development.

1.2. Purpose of Documents

The ethics and sustainable development documents fulfil an essential and practical role in the daily operation of AEROTEH S.A. These documents constitute the solid basis on which the organizational culture is built, ensure coherence in the decision-making processes and provide a reference framework for solving ethical issues in business and social responsibility.

Role in organizational culture

Ethics documents help define and encourage an organizational culture that emphasizes integrity, accountability and sustainability. In this sense, they serve as a set of norms and values that unite employees and management, facilitating a uniform approach to ethical and social issues.

Role in decision-making processes

Ethics documents are actively used in decision-making processes, serving as 'rules of the game' for management and employees alike. They provide clear guidance on how to approach and resolve situations involving ethical dilemmas or decisions that have social or environmental impact. Thus, the decisions taken are not only legal, but also ethical and in line with the Company's sustainable development objectives.

Role in problem solving

In situations of ambiguity or conflict, ethics documents function as an 'ethical first aid' manual. They provide guidelines and concrete examples to help employees navigate complex situations, evaluate options and choose the course of action most aligned with AEROTEH S.A.'s values and goals.

Training and evaluation tools

Ethics documents are also used in employee training and evaluation. They serve as criteria for evaluating ethical performance and adherence to sustainable development principles, thus contributing to continuous professional development and improving employee behaviour.

At AEROTEH S.A., ethics and sustainable development documents are active tools that directly and practically influence the way the Company operates and fulfils its mission. They are integrated into the daily work flow and form the basis for responsible corporate behaviour and an ethical organizational culture.

*Dumitru Bănuț
President of the Board of Directors & General Manager
AEROTEH S.A.*

2. Importance of Business Ethics for AEROTEH S.A.

2.1. Ethics as the Foundation of Business

Business ethics is not an abstract issue that can be ignored without consequence. It is, in fact, the central pillar on which all other elements of the business rest, including strategy, financial performance and stakeholder relations. Ethics is the element that gives durability and sustainability to the business and brings benefits, both tangible and intangible to the Company.

Trust as currency

In the business world, trust is often the most valuable currency. Without ethics, building and maintaining trust becomes nearly impossible. Relationships with customers, suppliers, partners and employees are all conditioned by the existing level of trust. Therefore, ethics is a practical necessity that directly influences the activity of the Company's employees.

Long term relationships

An ethical business is also more likely to establish and maintain long-term relationships. Ethical behaviour generates loyalty and reduces the risk of litigation, scandals or other negative events that can damage reputation. A solid reputation is an important competitive advantage that can differentiate AEROTEH S.A. in a crowded and changing market.

Sustainability and social responsibility

Ethics is not separate from the goals of sustainable development and corporate social responsibility. In fact, it emphasizes and complements them. Companies that operate ethically are more likely to be seen as sustainable and responsible investments, thus more easily attracting funding and valuable partnerships.

Competitive advantages

By adopting a firm position on ethical issues, AEROTEH S.A. can develop a competitive advantage. Employees are more motivated when they work for an ethical organization, customers are more willing to pay for premium products or services from a trusted company, and investors are more attracted to companies with a low ethical risk profile.

Ethics is essential for the long-term success of AEROTEH S.A. This forms the foundation on which trust, long-term relationships, sustainability and competitiveness are built. Ethics is not an option or a luxury. Ethics is a necessity and a strategic imperative for any company that wants to remain relevant and thrive in a complex and ever-changing business landscape.

*Dumitru Bănuț
President of the Board of Directors & General Manager
AEROTEH S.A.*

2.2. Ethics and Organizational Culture

Creating and maintaining an ethical organizational culture is a key priority for AEROTEH S.A., because such a culture is fundamental for motivating employees and assuming an extended responsibility towards all stakeholders. This expectation comes with the recognition that an ethical culture transcends mere policies and regulations, positively influencing the attitude and behaviour of every employee.

Employee motivation

The management of AEROTEH S.A. understands that an ethical organizational culture not only motivates employees, but also empowers them. Employees who work in an environment that values integrity, transparency and accountability feel more valued and engaged in their work. Motivation comes not only from external recognition, but also from the internal satisfaction of doing 'what is right'. This sense of pride and belonging increases commitment to the Company and improves overall performance.

Accountability towards stakeholders

The ethical culture of AEROTEH S.A. expands the notion of accountability beyond traditional obligations to shareholders to include employees, customers, partners, the community and the environment. This holistic approach ensures that Company decisions are evaluated not only in terms of economic impact, but also in terms of social and environmental consequences. Such shared accountability leads to more balanced and sustainable decisions, strengthening the Company's relationship with all stakeholders.

The management of AEROTEH S.A. recognizes and values the crucial role of an ethical organizational culture in motivating employees and promoting extended accountability towards stakeholders. This culture not only defines who we are as an organization, but also how the outside world perceives us. Therefore, each employee's commitment to these ethical business values is essential to achieving our shared vision of success and sustainable development.

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President of the Board of Directors & General Manager
AEROTEH S.A.*

Creation of an ethical culture

In order to cultivate an ethical culture, the management of AEROTEH S.A. engages in an ongoing process of education, communication and exemplification of ethical behaviour. Meetings, workshops and training sessions are just some of the ways to encourage open discussion about ethics and integrity. In addition, the leaders of AEROTEH S.A. function as role models for employees, demonstrating through their own behaviour the importance of adherence to ethical standards.

Benefits of an ethical organizational culture

A robust ethical culture leads to numerous benefits, including reducing internal conflicts, increasing employee loyalty, and improving the Company's image. By promoting a work environment based on mutual respect and common values, AEROTEH S.A. is concerned with attracting and retaining top talent, which is critical to innovation and long-term success.

3. Purpose and Objectives of the Ethics Policy

3.1. Clear and Rigorous Framework

AEROTEH S.A. Ethics Charter is the foundation on which the Company's entire organizational culture is based, providing a clear and rigorous framework for ethical and responsible decision-making. Starting from this Charter, the management of AEROTEH S.A. can express in the *Code of Business Ethics* its expectations of all its employees, encouraging them to actively engage in promoting integrity and transparency in all aspects of their work.

Establishing Standards

The *Code of Business Ethics* establishes the standards of conduct expected of each employee, regardless of their position or level in the Company hierarchy. These standards are designed not only to prevent misconduct, but also to guide employees in complex situations where the right answer is not always obvious. This document serves as a moral compass, helping employees navigate the ethical dilemmas they may face.

Promoting accountability and integrity

AEROTEH S.A. wants its employees to maintain a work environment based on accountability, integrity and mutual respect. These values are essential not only for maintaining a positive Company reputation, but also for ensuring a healthy work environment where employees feel valued and respected. In addition, accountability and integrity are critical factors in building trust with customers, partners and local communities.

Ethical decision making

The Ethics Charter and Code of Ethics also provide an appropriate framework for making and enforcing ethical decisions within the Company. This involves evaluating the available options not only from the perspective of short-term benefits or profit, but also of long-term impact on all stakeholders. Therefore, making and implementing decisions within AEROTEH S.A. represents a holistic process that takes into account ethical principles, social responsibility and sustainability.



Lifelong training and development

The management of AEROTEH S.A. recognizes the importance of lifelong education and personal development in promoting ethics among employees. Employees are encouraged to improve their understanding of ethical principles and develop the necessary skills to face ethical challenges. This commitment to lifelong education underlines the vision of AEROTEH S.A. that integrity and long-term success go hand in hand.

The Ethics Charter and the Code of Ethics are more than a set of rules; they are statements of values and principles that guide the Company in every aspect of its business. By promoting a clear and rigorous framework for making and applying ethical and responsible decisions, AEROTEH S.A. affirms its commitment to an organizational culture based on integrity, transparency and accountability. The management of AEROTEH S.A. wants every employee to embrace these principles, recognizing that integrity and accountability are essential not only for the individual good, but also for the collective good of the Company and all stakeholders.

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President of the Board of Directors & General Manager
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3.2. Commitment

The management of AEROTEH S.A. recognizes that the Company's long-term success in an ever-changing business environment depends on employees' ability to remain flexible and adaptable. The Ethics Charter is designed to reflect this need, providing a framework that enables adaptation to new challenges while maintaining a firm commitment to fundamental ethical principles. This framework serves as an example for all employees, encouraging them to take an active role in promoting and sustaining adaptability and ethical commitment.

Management team's commitment

AEROTEH S.A.'s commitment to ethics begins with a conscious effort on the part of management to model ethical behaviour. This is manifested through transparency, accountability and a firm commitment to making the right decisions, even when they

are difficult. The Company's top management demonstrates an unwavering respect for ethical principles in interactions with employees, customers, partners and the community. They recognize that every decision and action reflects directly on the values and reputation of AEROTEH S.A.

Management team's example

To reinforce the importance of adaptability and commitment, the management of AEROTEH S.A. assumes an exemplary role model. Through their own actions and decisions, Company leaders demonstrate how to navigate the ever-changing business environment without compromising ethical principles. The Company's top management sets a standard for all employees and emphasizes the importance of ethical adaptability as an integral part of professional life in AEROTEH S.A.

Employees' commitment

The management of AEROTEH S.A. believes that the adaptability and success of the ethics policy largely depends on employee commitment. Therefore, employees are encouraged to actively participate in the dialogue about ethics and accountability, providing feedback and suggestions for continuous improvement of the policy. This commitment not only helps to ensure policy relevance and effectiveness, but also cultivates a sense of ownership and accountability among employees towards the Company's ethical culture.

Cultivating an adaptable culture

Ultimately, adaptability and commitment in ethics policy is not just about responding to external changes, but also about implementing an internal culture that values development, learning and innovation. AEROTEH S.A. strives to create an environment where employees are encouraged to take calculated risks, learn from failures and contribute to the Company's continued evolution, all within an ethical framework.

The flexible and adaptable ethics policy of AEROTEH S.A. is a cornerstone of the Company's success, ensuring it remains relevant, accountable and competitive. Management and employees are partners in this process, working together to ensure that AEROTEH S.A. not only survives but thrives in a changing world by maintaining its commitment to the highest ethical standards.

*Dumitru Bănuț
President of the Board of Directors & General Manager
AEROTEH S.A.*

4. Accountability and Legal Framework

4.1. Accountability at All Levels

At AEROTEH S.A., the fundamental belief is that commitment to ethics and integrity is not optional, but essential and starts at the top of the hierarchy. This commitment is demonstrated in actions and decisions, reflected in every aspect of the Company's operations. Management understands that to build a deeply ethical corporate culture, the example must come from the top, setting a standard for all employees.

Dissemination of ethical culture

Management is committed to spreading this ethical culture at all levels of our Company, ensuring that every employee understands the importance of ethics and is equipped to make ethical choices in their daily work. Through trainings, open communications and ethical reporting systems, AEROTEH S.A. foster an environment where ethical standards are alive and relevant to all.

Shared responsibility

At AEROTEH S.A., ethical responsibility is seen as a shared task. Management recognizes that to maintain an ethical work environment, each employee must be an active participant. This means not only adhering to codes of conduct, but also encouraging colleagues to do the same and avoid any conduct that violates Company principles. Commitment to ethics and responsibility is not just top-down, but is nurtured and mutually supported at all levels.

Integrating ethics into day-to-day operations

Ethical commitment at AEROTEH S.A. is also reflected in the way the Company conducts its current operations. Business decisions, product development, marketing and sales are all made with a strong focus on fairness, honesty and sustainability. This commitment is manifested in the policy of sustainable procurement, fair labour practices and an unwavering commitment to environmental protection.

The commitment of AEROTEH S.A. towards ethics is alive and manifest in every aspect of the business, being shared by top management and every employee. This commitment ensures that AEROTEH S.A. respects ethical standards. Company management expects and encourages each employee to contribute to this culture, understanding that ethical success is fundamental to the overall success of AEROTEH S.A.

*Dumitru Bănuț
President of the Board of Directors & General Manager
AEROTEH S.A.*

4.2. Compliance and Transparency

AEROTEH S.A. bases its activity on the principles of absolute compliance with applicable laws and regulations and assumes the responsibility to carry out procedures and promote fair and ethical competition practices. This approach not only protects the Company and its employees, but also strengthens the trust and respect of customers, partners and the entire business community.

Through its commitment to compliance and transparency, AEROTEH S.A. affirms its commitment to ethical and fair practices in all aspects of its business. This approach builds trust between the Company, employees, customers and all partners, contributing to a fairer market and a better society. The management of AEROTEH S.A. encourages every employee to share and promote these values, recognizing that each individual plays an important role in the collective success of the Company.

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Manager
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Compliance as a pillar of activity

The management of AEROTEH S.A. emphasizes the importance of a thorough understanding and compliance with all laws and regulations relevant to its industry. This involves constant updating and continuous training of employees to ensure that all actions and decisions of the Company are in full compliance. Compliance is not viewed as a chore, but as an opportunity to demonstrate integrity and commitment to fair business play.

Transparency of actions

AEROTEH S.A. is committed to maintaining a high level of transparency in financial reporting, communications with stakeholders and in all business transactions. This transparency not only builds trust in the Company, but also ensures that all stakeholders have the information they need to make well-informed decisions. Transparency is also fundamental to preventing corruption and conflicts of interest, creating a healthy and sustainable business environment.

Promoting fair competition

The management of AEROTEH S.A. encourages its employees to adopt fair and ethical competition practices, recognizing that the Company's long-term success depends on the ability to compete on the basis of quality, innovation and excellent service. Fair competition contributes to a healthy market and stimulates innovation and continuous improvement, which can benefit the entire industry and society at large.

Role of employees in supporting compliance and transparency

Employees of AEROTEH S.A. are considered essential partners in the effort to maintain standards of compliance and transparency. Each employee has a responsibility to understand and apply ethical and legal principles in their daily work, to avoid any deviation from these principles and to contribute to the promotion of a fair and open business environment. Management encourages open dialogue and access to the resources necessary to fulfil these responsibilities.

5. Policy Communication and Dissemination

5.1. Role of the Department for Sustainable Development

The management of AEROTEH S.A. recognizes the vital importance of a deep commitment to ethics and social responsibility at all levels of society. To ensure this commitment and to transform it into concrete actions, a specialized department was established: the Department for Sustainable Development (DSD). This department plays a crucial role in the implementation of policies and the ethics policy in particular and in the education and training of employees, ensuring that the principles of sustainable development are not only understood, but also effectively applied in daily work.

Implementation of ethics policies

DSD is responsible for translating the ethics policies and principles from official documents into everyday practices and behaviours within the Company. This includes concern for the development of programmes and initiatives that facilitate the integration of ethical values into business processes, strategic decisions and daily interactions. Through its work, DSD ensures that ethics is more than a set of rules - it is an integral part of AEROTEH S.A.'s corporate culture.

Employee education

The role of the DSD also extends to lifelong education of employees about ethics. It must organize seminars, workshops and training sessions, offering educational materials that help to clarify the notions of ethics and to exemplify their application in real situations. Ethics education is designed to be an ongoing process that adapts to developments within the Company and changes in the global business environment.

A bridge between management and employees

DSD also functions as a two-way communication channel between management and employees. In accordance with Company procedures, employees can raise ethical concerns or suggestions, ensuring that their voice is heard and that their concerns are properly addressed. This open dialogue contributes to building trust and creating a work environment based on mutual respect and transparency.

Evaluation and monitoring

In addition, DSD has the role of evaluating and monitoring adherence to ethical principles within the Company. Through audits and reporting, DSD ensures that ethical standards are met and that any misconduct is identified and corrected effectively. This

continuous monitoring ensures that AEROTEH S.A. remains true to its commitment to ethical and responsible leadership.

By establishing the Department for Sustainable Development, AEROTEH S.A. demonstrates a commitment to promoting and supporting an ethical work environment. This specialized structure plays an essential role in the effective implementation of ethics policies and in cultivating an organizational culture in which ethics is the basis of every action. The management of AEROTEH S.A. expects every employee to work with the DSD, contributing to a sustainable and ethical future for the Company and everyone involved.

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5.2. Continual Adaptation and Improvement

The management of AEROTEH S.A. treats ethics policy as a dynamic, ever-evolving framework that responds to internal and external changes in the business environment. This vision of the ethics policy as a living document emphasizes the importance of adaptability and continuous improvement in a proactive and responsive manner to employee feedback, market trends and new ethical challenges.

Policy adaptability

AEROTEH S.A. recognizes that business, technology and society are changing at a rapid pace and ethical challenges are constantly evolving. Therefore, the ethics policy is reviewed periodically to ensure that it remains relevant and effective in guiding the ethical conduct of employees. This flexibility ensures that the policy not only responds to the current needs of the Company and its stakeholders, but also anticipates future ethical dilemmas that may arise.

Continuous improvement

The management of AEROTEH S.A. encourages a culture of open feedback and lifelong learning, where employees are motivated to contribute to the development and improvement of ethics policies. This continuous improvement process not only helps keep the policy relevant, but also cultivates a sense of ownership and commitment among employees, who see the ethics policy as a reflection of their personal values and beliefs.

Role of employees in the improvement process

Employees are considered key partners in the process of continuous improvement of the ethics policy. The management of AEROTEH S.A. encourages them to share their experiences, challenges and observations, thereby providing valuable insight that can guide policy revisions. Through active involvement, employees contribute not only to the shape of the policy, but also to the creation of a strong and ethical organizational culture.

Monitoring and evaluation

To support continuous improvement, AEROTEH S.A. implemented mechanisms for monitoring and evaluating the effectiveness of the ethics policy and its implementation. This includes periodic reviews, employee opinion polls, and evaluations of the impact of ethical decisions on Company performance. Through these methods, management can quickly identify areas that need adjustment or improvement, ensuring that the ethics policy remains aligned with the Company's goals and values.

The approach of AEROTEH S.A. to the ethics policy as a living, adaptable document focused on continuous improvement demonstrates the Company's commitment to ethics and integrity. Through the active involvement of employees and an open feedback and review process, AEROTEH S.A. ensures that its ethics policy remains an effective tool in promoting responsible and ethical behaviour that supports the Company's long-term success and sustainability.

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