



EUROPEAN TRANSONIC WINDTUNNEL

## CODE OF CONDUCT

# ETW's Code of Conduct

The European Transonic Windtunnel GmbH (ETW) is committed to promoting its core values in respect of human rights, labour, environmental and anti-corruption practices, and is determined to ensure the highest standards of responsibility throughout its operations and provision of wind tunnel testing services. All ETW business shall be conducted in a manner compatible with this Code of Conduct, and ETW expects its suppliers to comply on their own accord and further cascade these principles throughout their supply chain.

This Code of Conduct outlines the behaviour to be complied with by all ETW employees. ETW will conduct its business fairly, impartially, in an ethical and proper manner, in full compliance with all applicable laws and regulations. In conducting its business, integrity must underlie all company relationships, including those with customers, suppliers, communities and among employees. Employees will not engage in conduct or activity that may raise questions as to the company's honesty, impartiality, reputation or otherwise cause embarrassment to the company.

To comply with the requirements of its customers and to support the application of global standards for business ethics and compliance, ETW's Code of Conduct is based on the Model Supplier Code of Conduct issued by the International Forum on Business Ethical Conduct, IFBEC, to be applied by suppliers throughout the Aerospace and Defence industries. For further questions on IFBEC, please feel free to visit their website: [www.ifbec.info](http://www.ifbec.info).

## GENERAL DISCLAIMER

This Code of Conduct is in no way intended to conflict with or modify the terms and conditions of any existing contract. Unless otherwise stated, in the event of a conflict, ETW will adhere to the terms outlined in the contract.

## 1 Compliance with Laws

ETW will comply with all laws and regulations applicable in Germany.

## 2 Human Rights

ETW will treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture, in accordance with the relevant International Labour Organization (ILO) Conventions.

### A. Child Labour

ETW will ensure that illegal child labour is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed provided the legal age is consistent with the minimum working ages defined by the International Labour Organization (ILO).

### B. Human Trafficking, including Forced or Indentured Labour

ETW will adhere to regulations prohibiting human trafficking, and comply with all applicable local laws in the country or countries in which it operates. ETW refrains from violating the rights of others and address any adverse human rights impacts of its operations.

## 3 Employment Practices

### A. Harassment

ETW will ensure that its employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.

### B. Non-discrimination

ETW will provide equal employment opportunity to employees and applicants for employment without discrimination.

### C. Wage and Benefits

ETW seeks to provide competitive, cost effective and equitable compensation and benefits, which enable it to attract, motivate and retain appropriately qualified and experienced personnel. ETW will pay staff more than the minimum compensation required by German law and provides above the minimum legally mandated benefits. Deduction from wages as a disciplinary measure are not permitted.

### D. Social Dialogue

ETW will respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. ETW will recognise and respect any rights of workers to exercise lawful entitlements that are bestowed under German labour laws.

## 4 Anti-Corruption

### A. Anti-Corruption Laws

ETW will comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which ETW does business.

ETW refrains from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity may not violate local law. Personal safety payments are permitted where there is an imminent threat to health or safety.

ETW will exert reasonable due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants.

### B. Illegal Payments

ETW will not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives or others. The receipt, payment, and/or promise of sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such activity may not violate local law.

### C. Fraud and Deception

ETW will not seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so. This includes defrauding or stealing from the company, a customer or any third party, and any kind of misappropriation of property.

## **D. Competition and Anti-Trust**

ETW will not fix prices or rig bids with their competitors, and will not exchange current, recent, or future pricing information with competitors. ETW will refrain from participating in a cartel.

## **E. Gifts/Business Courtesies**

ETW will compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. ETW will ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organisation, and are consistent with reasonable marketplace customs and practices.

## **F. Insider Trading**

ETW and its staff will not use any material or non-publicly disclosed information obtained in the course of their business relationship with its customers as the basis for trading or for enabling others to trade in the stock or securities of any company.

# **5 Conflict of Interest**

ETW will avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. ETW will provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of its customer and personal interests or those of close relatives, friends or associates.

# **6 Maintain Accurate Records**

ETW will create accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction will fully and accurately represent the transaction or event being documented. Records will be retained based on the applicable retention requirements.

# **7 Information Protection**

## **A. Confidential/Proprietary Information**

ETW will properly handle sensitive information, including confidential, proprietary, and personal information. Information will not be used for any purpose (e.g. advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorisation from the owner of the information.

## **B. Intellectual Property**

ETW will comply with all the applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

## **C. Information Security**

ETW will protect the confidential and proprietary information of others, including personal information, from unauthorised access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures. ETW will comply with applicable data privacy laws.

## 8 Environment, Health, and Safety

ETW's Quality Management System covers environmental, health and safety issues.

ETW will operate in a manner that actively manages risk, conserves natural resources and protects the environment in the communities within which it operates.

ETW will protect the health, safety, and the welfare of their employees, contractors, visitors and others who may be affected by their activities.

Finally, as stated in Section 1 "Compliance with Laws" of this Code, ETW will comply with all applicable environmental, health and workplace safety laws and regulations.

## 9 Global Trade Compliance

### A. Import

ETW will ensure that its business practices are in accordance with all applicable laws, directives and regulations governing the import of parts, components, and technical data.

### B. Export

ETW will ensure that its business practices are in accordance with all applicable laws, directives and regulations governing the export of parts, components, and technical data. ETW will provide truthful and accurate information and obtain export licenses and/or consents where necessary.

## 10 Ethics Program

### A. Whistleblower Protection

ETW will provide its employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. In the unlikely case of need, ETW will take action to prevent, detect, and correct any retaliatory actions.

### B. Ethics Policies

ETW's Code of Conduct, its implementation and regular compliance revision are an inherent part of ETW's Quality Management System.