

# ***OUR SHARED RESPONSIBILITY***

***CODE OF CONDUCT***



*TPAerospace*



# TABLE OF CONTENTS

Foreword by the CEO .....	4
Intro to the Code of Conduct.....	5
Driven by guiding principles and clear values.....	6
Respect for the business and our customers .....	8
Quality and product safety .....	8
Bribery and corruption.....	8
Facilitation payments .....	9
Gifts and hospitality.....	9
Anti-Bribery & Corruption Training.....	9
Respect for our people.....	10
Health and safety .....	10
Privacy.....	10
Respect for Society .....	11
Environmental protection.....	11
Human Rights.....	11
Responsible Taxation.....	11
Communication.....	11
Respect for our shareholders.....	12
Protecting company assets.....	12
Financial disclosure.....	12
Rising concerns.....	13

# FOREWORD BY THE CEO

Dear Green Team

TP Aerospace is founded on a vision to create a world class business, where ambition, passion, quality, and integrity are at the core. As employees, managers, executives, or Board members, we all share a commitment to protect TP Aerospace, each other, and our business partners from engagement in any activity that contradicts our founding principles.

This Code of Conduct, Our Shared Responsibility, is designed to guide everyone representing TP Aerospace to act in accordance with our principles, and to continue to foster a strong culture where we, the Green Team, never compromise when it comes to business ethics and integrity. We believe this is key to maintaining a strong Green Team that we are all proud to be part of, as well as a sustainable business model that provides long-term value for all stakeholders.

In this Code of Conduct, we guide you through the simple and clear principles we follow as a company, which will help you navigate difficult and potentially unethical situations.

You must read and understand the Code of Conduct and use it to guide your decisions and actions. Where the Code of Conduct does not provide you with sufficient guidance, or you are unsure how our company principles apply in a given situation, you should always ask questions and seek further guidance.

By doing so, you are living up to the commitment of Our Shared Responsibility.

Best regards

 Nikolaj Lei Jacobsen, CEO

# INTRO TO THE CODE OF CONDUCT

The Code of Conduct (hereafter referred to as “the Code”) is a supplement to our overarching Corporate Responsibility Policy, Anti-Bribery & Corruption Policy, Whistleblowing Policy, and other related company policies.

The Code applies to anyone conducting business on behalf of TP Aerospace:

- All employees within any of TP Aerospace’s entities around the world
- Executive Management and Board of Directors
- Any third-party representatives acting on behalf of TP Aerospace or in our interest

It is the responsibility of the individual employee to read, understand and act in accordance with the Code and all other company policies and to seek clarification or guidance when in doubt.

All managers in TP aerospace have an extended responsibility to ensure that any employee reporting to them has read and understood the Code, that they know how to perform their daily work in accordance with the Code and our company values, and that they are aware of how to voice any concerns. Managers must always lead by example and promote a culture where employees feel safe raising their concerns.

Failure to comply with the Code may lead to disciplinary action up to and including termination. Disciplinary action will also be taken against anyone who retaliates against an employee for refusing to act in violation of the Code or for raising a concern about potential misconduct in good faith.

Any revisions and amendments to the Code will be clearly communicated to all.

# DRIVEN BY GUIDING PRINCIPLES AND CLEAR VALUES

Whether you are a manager, an employee or a third-party representative acting on behalf of TP Aerospace, we expect you to always exercise mutual respect towards each other and external stakeholders and to act in accordance with our shared principles and values in your daily work life.

We adhere to and support internationally recognized principles on responsible business conduct, and we are signatory to the UN Global Compact whereby we are committed to align our operations and strategies with ten principles within human rights, labor, environmental protection, and anti-corruption.

Our Corporate Responsibility Policy is further aligned with the UN Guiding Principles on Business and Human Rights, which we use as blueprint in our endeavors to ensure that we do not cause negative impacts on people's enjoyment of their human rights.

As a team, we are on a mission to deliver the best, most flexible, and most responsible solutions for airlines all over the world. At the center of this lies a fundamental value of respect. This Code is designed to guide employees and illustrate to business partners how we maintain a high level of respect:

- Respect for the business and our customers
- Respect for our people
- Respect for society
- Respect for our shareholders

## WHAT ARE OUR VALUES

TP Aerospace is a value driven company, which means that we make decisions based on our shared values, and we have high expectation of our colleagues and managers to do the same.

Our five simple values guide our decisions and encourage our behavior. Combined, our values define a unique company culture.

**LEAD**

**KEEP IT SIMPLE**

**BE FOCUSED**

**STAY CURIOUS**

**HAVE FUN**

# RESPECT FOR THE BUSINESS AND OUR CUSTOMERS

The term “business ethics” covers our efforts to protect TP Aerospace and our business partners from engagement in any form of corruption and bribery. High business ethics is at the core of everything we do, as only by eliminating corruption from our business environment, we can continue to supply high-quality products in a market characterized by fair competition.

## Quality and product safety

Quality and product safety are key when operating within aviation. Therefore, we are certified to the highest quality standards and are committed to providing products and services exceeding our customers’ requirements.

All employees throughout TP Aerospace play a vital role in managing and executing their activities to the standards of our global quality management policies and framework, and thereby contributing to product safety and a continued strong relationship with our customers.

With global and local quality teams in place, we have developed strict internal audit procedures designed to ensure that quality control standards are met and that we deliver products of the highest possible standard.

## Bribery and corruption

TP Aerospace has a zero tolerance towards corruption and bribery, whether in the form of kickbacks or the direct offering or receiving of benefits.

TP Aerospace’s Anti-Bribery & Corruption Policy further details the principles for the management of bribery and corruption risk across TP Aerospace. The Anti-Bribery & Corruption Policy builds on applicable laws and regulations for the jurisdictions in which TP Aerospace operates, including the UK Bribery Act of 2010, the UN Convention Against Corruption and the US Foreign Corrupt Practices Act.

## Facilitation payments

Facilitation payments are typically small, unofficial payments to officials for expediting a service that you are already entitled to.

While bribery laws in some countries, including the US, make an exception for facilitation payments, TP Aerospace prohibits the making of these payments across the entire organization, whether they are permitted by local laws or not.

## Gifts and hospitality

In today’s business environment, gifts and hospitality play an important role in facilitating business, and at TP Aerospace, offering or accepting courtesies play a part in how we manage to build strong and trusting bonds to our business partners.

However, gifts and hospitality must be offered and accepted with caution, as failing to do so can result in a conflict of interest and accusations of bribery or conflicts of interest.

Thus, gifts and hospitalities are accepted when they:

- are not given with the intention of influencing the receiver’s decision making
- are of nominal value
- do not exceed generally accepted business practices

TP Aerospace’s Anti-Bribery and Corruption Policy provide further guidance to all employees on gifts and hospitality. Employees are expected and trusted to act with integrity and use their common sense when representing TP Aerospace.

## Anti-Bribery & Corruption Training

As part of TP Aerospace’s efforts to protect ourselves, our employees, and our business partners from engagement in any form of corruption or bribery, we conduct regular online Anti-Bribery and Corruption training. The training is mandatory for all employees who, in light of their job roles, are at risk of being exposed to attempts of bribery and corruption.

# RESPECT FOR OUR PEOPLE

TP Aerospace relies on the skills and commitment of our employees to drive and grow the company, and we are committed to our employees' wellbeing and to fostering a healthy and trusting work environment.

## Harassment and discrimination

At TP Aerospace, we have people of many different backgrounds, nationalities, cultures, and skills; Together, they constitute one global team. We are proud of the level of diversity we have, and it is crucial that we do our best to ensure that everyone feels included.

We have a harassment-free workplace. Everyone has the right to feel comfortable and safe at work, and discrimination based on race, religion, gender, age, sexual orientation, or any other characteristic is never accepted. Sexual harassment, which may include, but is not limited to, unwanted sexual advances, is never allowed.

Similarly, no employees should ever experience being bullied, intimidated, or abused for any reason, and no form of violence is ever accepted in the workplace.

## Health and safety

As an employer, we have an obligation to ensure that all employees can enjoy safe and healthy working conditions, and through our safety organization, we are committed to preventing accidents and injuries in the workplace.

All employees at TP Aerospace, regardless of region and division, are included in a training program designed to promote safety at work. It is the responsibility of the manager to ensure that their employees have read and understood the guidelines and procedures provided, and it is the responsibility of the individual employee to follow the procedures and implement them in their daily work.

Through our global HR team, we continuously work to assess and strengthen the physical and psychological work environment.

## Privacy

We are committed to protecting the privacy of our employees in strict compliance with personal data protection laws in all countries in which we operate.

We limit access to personal information to authorized individuals, and only disclose personal information in compliance with applicable laws and when there is a clear business purpose.

Employees who have access to personal information as part of their work at TP Aerospace are required to manage such data in accordance with this code as well as applicable legislation.

# RESPECT FOR SOCIETY

As a responsible corporate citizen, we acknowledge our role in society and are committed to ensuring that we contribute, while not becoming a barrier, to social and economic development.

## Environmental protection

Recycling and reuse of parts is at the core of our business model, and we are focused on ensuring that our operations do not cause unnecessary harm to the environment and human health.

We are committed to:

- Minimizing the environmental impacts of our operations, whether in our workshops, warehouses or offices
- Conducting regular due diligence to identify potential environmental risk
- Complying with global and local regulation on environmental protection
- Continuously optimizing our transportation operations
- Educating our employees on our commitment to environmental protection

## Human rights

For TP Aerospace, the foundation of being a responsible global citizen is an overarching commitment to respect internationally recognized human rights.

Thus, we are committed to respecting human rights within our sphere of influence and to actively encourage business partners to demonstrate good human rights practices.

We continuously update our processes and procedures to identify and prevent potential adverse impacts our operations may have on people's enjoyment of their human rights and to mitigate such impacts.

## Responsible taxation

Tax avoidance and evasion can potentially undermine democracy as well as the economic and social development of some nations.

Operating globally, TP Aerospace is committed to a responsible approach to tax, which means that we comply with applicable tax legislation and pay taxes in the countries where our business activity generates profit.

## Communication

Open and honest communication is key to transparency, and we are committed to communicating the actual implications of our business operations on social, environmental and economic factors to our surroundings.

Together with the annual financial statements, we issue a corporate responsibility statement to provide our stakeholders with accurate non-financial information, addressing matters related to human rights, labor, environmental protection, and anti-corruption. This statement must fully represent the transactions and events throughout the year, and it is the responsibility of the company management to ensure that nothing is concealed or that records cannot be misinterpreted.

# RESPECT FOR OUR SHAREHOLDERS

We value our shareholders' trust in TP Aerospace and in our people, and we are committed to conducting business with the highest level of transparency and integrity to realize our growth potential.

## Protecting company assets

Company assets refers to the company's global inventory of aircraft wheels and brakes as well as any other physical and non-physical property, including, but not limited to, machinery, IT equipment, technology, and data.

All employees are expected to show respect for all physical and non-physical assets and only use them for their intended use. Employees are further responsible for the accurate use of assets and for doing what they can to prevent misappropriation and theft.

As employer, TP Aerospace is committed to providing our employees the training and knowledge needed to enable them to protect company assets from damage, waste, or misuse.

## Financial disclosure

We are committed to always maintaining accurate books and records, to be able to provide our shareholders with an overview of our operations and financial standing.

Annually, we issue a financial statement for the calendar year from January 1st to December 31st, and while the employees involved in the reporting are responsible ensuring correct financial information, it is ultimately the responsibility of the company leadership to guarantee that we deliver true and fair financial statements.

# RISING CONCERNS

If employees experience or suspect breaches of this Code or other company policies, they are encouraged to speak up.

Employees should first report concerns to their direct manager or HR where this is possible. In severe cases and in cases where the suspected breach cannot be reported to the direct manager or HR, the employee should report the concern in accordance with the company's Whistleblowing Policy and Guidelines.

The Policy provides employees with an alternative channel for reporting compliance violations or possible irregularities through a "Speak-up" hotline when concerns are of more severe character or if the manager has not adequately handled the concern.

Any questions or concerns relating to this Code of Conduct can always be directed to Executive Management, who is committed to ensuring that every employee in TP Aerospace is upheld to the high standards described in the Code of Conduct.



***WHEELS  
AND  
BRAKES***

***- IT'S THAT  
SIMPLE***

