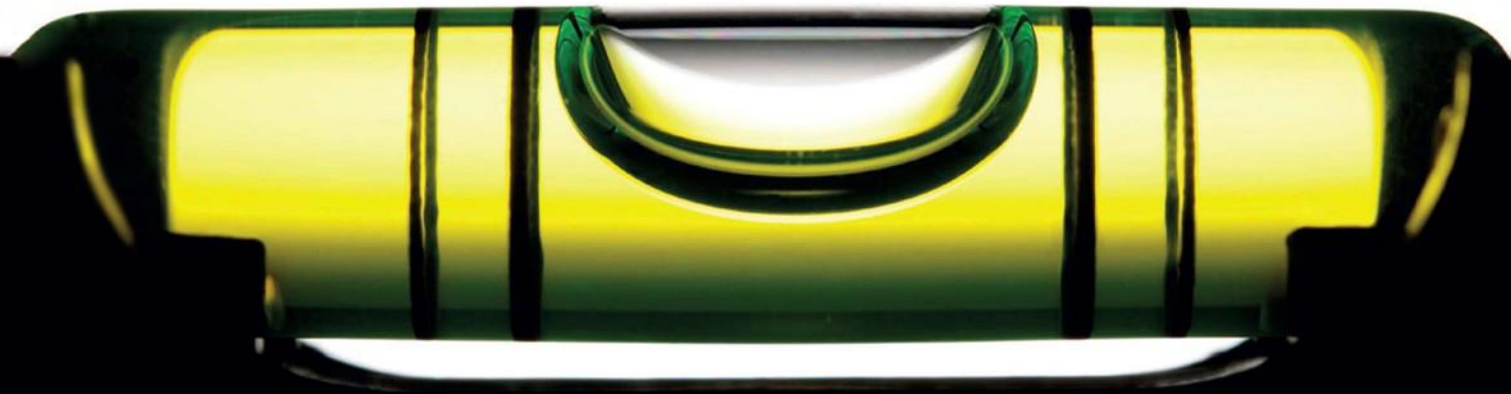


# ALESTIS' CODE OF ETHICS

ETHICS & COMPLIANCE



**ALESTIS**  
AEROSPACE

# CEO'S MESSAGE

Dear Colleagues,

Within Alestis, we strongly believe that Ethics is an essential value in developing of our work. We are convinced that only through a kind of management based on the highest standards of ethical behaviour it is possible to build a sustainable company and to achieve the goals we set ourselves.

Alestis' Code of Ethics (hence, "Alestis' Code"), which is our fundamental rule, contains the lines of action that will help us to orient our behaviour and guide us in making decisions towards the achievement of these goals.

It is Alestis' Ethics and Compliance System cornerstone, a System that we have implemented and developed over the last years and which comprises policies, procedures and handbooks, controls and channels necessary to maintain the ethical and compliance standards that we demand from ourselves as part of the society to which we belong.

Today, I am delighted to introduce all of you this new edition of Alestis' Code, with a renewed appearance but containing the same commitment and conviction that have led us to the path of sustainability.

Updating Alestis' Code within a changing environment, in which society's demand for integrity and transparency is ever greater, allows us to enhance confidence among all of us at Alestis and our stakeholders, strengthening our commitment to maintaining the highest standards in terms of management and compliance with regulations, but also regarding the individual motivation that drives us to do the right thing.

Under the conviction that we all share the values embodied at Alestis' Code, I expect you all to hold accountable to it and count on you to become its most fervent defenders.

The main driver in the success of our Company rests with each and every one of us.

Sincerely,

**M<sup>a</sup> Eugenia Clemente Zárate**  
CEO Alestis Aerospace



# OUR VISION, MISSION AND VALUES

Our Mission, Vision and Values identify us. To achieve our Vision and fulfil our Mission, we must put into practice the Values we have cultivated.

- ④ The **VISION** marks the place where we aspire to be in the long term.

At Alestis, we are convinced that we want *"to be strategic partners of the main aeronautical manufacturers and recognised as a responsible company"*

- ④ The **MISSION** is our *raison d'être* as a company; our inspiration to commit ourselves to achieve our goals.

At Alestis, *"we provide comprehensive and innovative solutions in the aerostructures market, generating added value for our customers through the talent of our team and the combination of advanced technologies"*

- ④ **VALUES** are the beliefs and principles that govern the Company, which orient the action guidelines and the behavioural pattern of people who make up the organisation.

They are the basis on which Alestis' Code is held and the link between everyone together at Alestis.

At Alestis, *"we count on responsibility, innovation, excellence, commitment, enthusiasm and value creation. These are the values which constitute our corporative culture basis"*



# OUR VALUES

## RESPONSIBILITY

*"Responsibility, our way of acting"*

As a company, we are not an isolated entity. We exist in an environment on which we depend and we are aware of the repercussions of our actions, which is why we implement practices that strengthen the sustainability of both the company and the environment.

For this reason, we contribute to society by interacting with non-profit organisations, with other companies and institutions, supporting social initiatives and developing and promoting initiatives focused on improving the quality of life of people and environment of communities where we operate.

## INNOVATION

*"We innovate, we build the future"*

We combine creativity and technological knowledge to generate value, offering unique and advanced solutions.

Our customers are our *raison d'être* and satisfying their needs and expectations, and earning their trust, our goal. Therefore, we reinvent our processes, products and systems to adapt to a changing environment and to keep our competitiveness and, thus, the quality of the work of all those who are part of Alestis.

## VALUE CREATION

*"We focus our performance on the Company's profitability"*

We work to create value for our customers, employees and shareholders as a guarantee of sustainability.

## COMMITMENT

*"Our success is the outcome of our commitment"*

We are proud of the company to which we belong and which we feel identified with. Thus, we give ourselves to the project with dedication and effort, rigorously working and getting involved in our work, offering the best of ourselves to achieve the objectives of the organisation.

## ENTHUSIASM

*"It is the attitude with which we face challenges"*

We put our heart into what we do, giving the best of ourselves to achieve our goals.

We are a company with our own personality; our motivation and enthusiasm make us unique. Our predisposition, dedication, perseverance and energy are key factors in the development of our work, assuming that our attitude determines the results.

## EXCELLENCE

*"Excellence is our driving force"*

Our capacity to overcome drives us to challenge ourselves every day to achieve outstanding results as a team. We continually improve, aiming for excellence as a way of working and we promote innovation as a key factor of competitiveness.

**“It is not difficult to make decisions  
when you know what your values are”**  
Roy Disney



# What is our Code of Ethics?

The Code of Ethics is a set of **binding rules** intended to provide and define expected standards of conduct of all of us at Alestis and that establishes principles to guide our actions.

It serves, in short, as reference and support guide for daily decision making, which **translates Alestis' values, principles and conduct commitments into behavioural patterns.**

## What is Alestis' Code of Ethics for?

Many of the situations we face on a daily basis in the course of our work can be located in the so-called "grey areas", on which there may be several opinions that make it difficult to make a decision.

As members of Alestis, we are connected to different people we interact with and therefore, we many relationships in the exercise of our functions, both internally (with teammates, other departments and other levels of the organisation) and externally (with customers, suppliers, public administrations, etc.).

In order to maintain cohesion between all the possible ways of dealing with the same situation, **it is essential to work within the same ethical and compliance framework** to guide us in such decision-making.

We are aware that **the right answer is not always the most obvious one**, and because of that, Alestis' Code articulates a framework of action which, beyond compliance with the law, establishes general principles by which our conduct should be governed. Acting responsibly, with integrity, respect and professionalism, and abiding by the laws and regulations of the countries in which we operate, is an essential part of our corporate culture.

## When and whom does the Code of Ethics apply to?

Alestis' Code is applicable, without exception, to all members of our company, regardless of any factor such as hierarchical position, seniority, level of responsibility or geographical location.

Each and every one of the professionals who make up Alestis assumes the **obligation to comply with this Code**, understanding its content and the values on which it is based. Likewise, it is essential the promotion of compliance by all of us, being aware that we transmit by example.

Additionally, Alestis promotes the adoption of solid ethical standards by its stakeholders. For this reason, this Code is accessible to all third parties whom we interact with, and we encourage them to comply with similar ones.



## Common Sense: a step beyond the Code of Ethics

Our Code of Ethics shall be considered as a guide that directs us to achieve the Company's objectives, always respecting our principles and values and, therefore, shall govern the performance of our duties and the development of our internal and external relations.

Understandably, the Code cannot address all the situations and ethical dilemmas that we may encounter in our day-to-day. When in doubt, it is important to apply common sense and, as an aid, we can ask ourselves the following questions ("red-face judgement"):

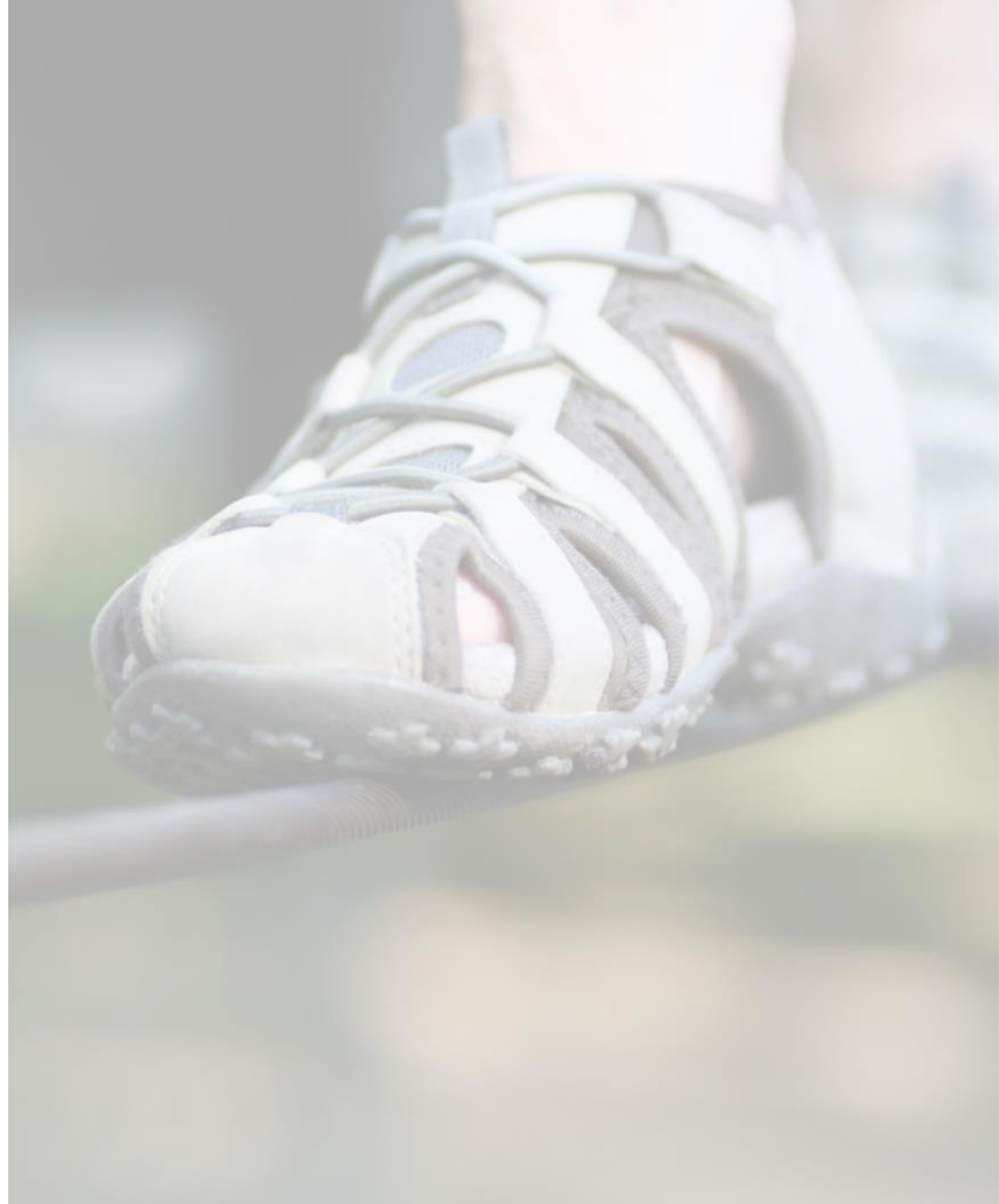
- Does this action comply with the applicable law or regulation?
- Am I sure it is ethical?
- Would I want to make the front page of a newspaper after taking this decision?
- Am I worried that others will find out about my decision?
- Would I feel good if my immediate environment knew about this behaviour?

If the answer is "no" to any of these questions, don't do it. An unclear answer, or answers similar to phrases such as the following, should raise doubts.

- "No one will find out".
- "It's not right, but everybody does it".
- "Don't worry, it's always been done this way".
- Do what you want, but don't tell me about it



**Ethics and Compliance Department is always available to assist you.**



# OUR PRINCIPLES OF CONDUCT

Principles of conduct allow us to develop our ethical values. They are, in short, our values in action.

Alestis is firmly committed to carrying out its activities in accordance with the legislation in force in each of the countries and territories in which it operates. We all must act in a professional, diligent, responsible, effective and efficient manner, pursuing excellence and quality.

Our behaviour must always be loyal, honest, frank and in good faith, complying with our legal obligations (hard law), but also with the commitments and responsibilities voluntarily assumed by the Company (soft-law).

## WITH OUR PEOPLE

- We are committed to respect fundamental rights
- We encourage respect, integrity and honesty
- We offer a safe and healthy workplace
- We are committed to diversity and equal opportunities
- We promote work-life balance
- We promote open dialogue

## WITH OUR ENVIRONMENT

- We are committed to our community
- We are environmentally responsible

## WITH OUR ASSETS

- We protect information and confidentiality of records
- We respect and protect intellectual property rights
- We protect corporate reputation and image
- We ensure privacy and the correct processing of personal data

## IN OUR BUSINESS

- We avoid conflicts of interest and, if they occur, we manage them appropriately.
- We comply with anti-bribery and anti-corruption measures and avoid criminal conduct of any kind.
- We ensure transparency and appropriateness of financial reporting
- We promote fair and honest competition
- Relations with customers and suppliers
- Relations with institutions, authorities and officials

# WITH OUR PEOPLE

**“What differentiates a successful company from an unsuccessful one is first and foremost people, their enthusiasm, their creativity; everything else can be bought, learned or copied”**

Charles-Henri Besseyre des Horts.

Credibility and reliability of our Company depends on our behaviour: while being and acting responsibly with our people and our environment, we will ensure success. Respect and honesty must therefore prevail in our personal relationships and in the performance of our activities. It is an unavoidable individual liability, which commits us to ourselves and to others

## ● We ensure respect for Fundamental Human Rights

Alestis' commitment to the values underpinning this Code would have no credibility if they were not reflected in a working relationship based on respect for dignity of all employees and for their Fundamental Rights. This is expressly stated at the company's Human Rights policy.

Fundamental Human Rights are inherent to everyone, whatever their nationality, origin or any other condition be. Alestis' actions and those ones all of us who are part of it, shall respect national and internationally individual rights and shall be free from any abuse of power or behaviour that might offend others.

## ● We promote respect, integrity and honesty

Respect, integrity and honesty are essential values for generating and maintaining a good working environment.

At Alestis, we are convinced that the working environment is a key element for our organization's competitiveness and it would be a brake on innovation if fear of making mistakes, mistrust or intimidation were to take place in it.

In this sense, Alestis promotes the "Fair Culture" policy, which means that no one seems to be looking for the culprits for their actions, omissions or decisions when such situations (that is, actions, omissions or decisions) are in accordance with their experience and training, as long as there is no gross negligence, intentional infractions or destructive acts.

Alestis is made up of each and everyone who work there; we are the ones who shape the working environment and we must feel responsible for it.

Furthermore, we not only mean respect and honesty in personal relations with members of our company, but also in our relations with people and organisations outside the company, such as suppliers, contractors or customers.



# WITH OUR PEOPLE

## We offer a safe and healthy workplace

Alestis is committed to protecting its employees and all persons accessing its facilities from health and safety risks that could arise in the course of their activities.

Therefore, Alestis' promotes a culture of health and safety, in which we must all accept appropriate responsibility for ourselves and others. We must be aware of the relevant legislation, policies and procedures and strictly comply with them, ensuring that we use the material means provided to us in a responsible manner so that we can carry out our activity with the appropriate health and safety standards.

Concealing work accidents or very serious incidents, falsify safety records or order breaches of safety regulations is forbidden.

It is strictly forbidden to work under the influence of drugs and alcohol or any other substance that may affect our behaviour and professional performance.

## We are committed to diversity and equal opportunities

We are aware of the importance of ensuring equal opportunities for men and women in access to employment, training, promotion and working conditions, as well as of the diversity management, ensuring respect for the individual characteristics and personal dignity, privacy and personal rights of each employee within our organisation.

Alestis will not tolerate and will prosecute any action that may cause situations of discrimination for any reason (origin, nationality, ideology, religion, race, gender, age, sexual orientation, etc.), injury to personal dignity or physical, sexual, psychological, moral or any other type of harassment.

### What do we mean by **HARASSMENT**?

Any behaviour whose purpose or effect is to violate the dignity of a person or to create an intimidating, hostile, degrading, humiliating or offensive working environment.

## We promote work-life balance

Alestis is fully cognizant of the importance of maintaining a proper balance between personal, family and working life.

For this reason, it promotes and encourages measures aimed at facilitating such healthy work-life balance, through the establishment of specific actions within the framework of its Family-Responsible Company policy.

## We promote open dialogue

Social dialogue is essential to create an environment of trust and to share knowledge and experiences, which leads to an environment of satisfaction and favours continuous improvement and sustainability.

For this reason, at Alestis we encourage all members of our organisation to communicate, discuss and clarify doubts or incidents, engaging in constructive dialogue with the different stakeholders .

# IN OUR BUSINESS

 **Integrity is about doing the right thing, even when no one is looking**   
C. S. Lewis

## We avoid any kind of criminal conduct and comply with anti-bribery and anti-corruption measures

Alestis maintains a strict policy of "**ZERO tolerance**" towards the commission of any form of criminal conduct, especially for those ones that could lead to criminal liability for the Company as a legal entity.

Particularly regarding to **corruption**, understood in a broad sense:

- we do not offer, pay or accept bribes or kickbacks for any purpose, either directly or through a third party;
- we do not make **facilitation payments** neither allow others to do so on our behalf;
- before offering or accepting any gift or invitation, we ensure that it is permitted by internal policies and will not be considered as a form of improper influence

Regarding to this last aspect, it is important to be aware of the established **guidelines for accepting gifts**. Business courtesies, such as gifts and hospitality given to or received from customers and suppliers, are normally used to build trust and show appreciation in the context of business relationships, but they should never lead to corrupt business dealings.

Gifts must be limited to customary business courtesies and must not influence or appear to influence a business decision.

Alestis will not tolerate conduct that unduly favours a third party, or be favoured, by the receipt or solicitation, promise or offer of any unjustified benefit or advantage, even when such advantage is for our own company.

## Corruption manifestations

Fraud is an intentional and dishonest act aimed at obtaining an unfair or unlawful benefit or advantage, resulting in a loss for the company. Some examples of this type of conduct would be: making private use of company assets, fraudulent expense settlements, the use of falsified invoices or the certification of a quality inspection that has not been carried out.

Other situation to highlight and that will not be tolerated by Alestis is the execution of any kind of actions which can lead Alestis to a situation of insolvency or which, already being in such insolvency situation, could aggravate the effects for our creditors or favour one of them over the rest.

Likewise, Alestis will not permit and will prosecute falsification of means of payment (credit card, debit card or traveller's cheques) and the use of deception in order for someone to carry out an act of disposition to their own detriment or to the detriment of a third party (scam).

Regarding money laundering that is, broadly speaking, the concealment or use of any assets originating from criminal activity, Alestis will not tolerate conducts that could constitute such situation and thus, will only accept funds received from legitimate sources, thereby combating both money laundering itself and financing of terrorism.

# IN OUR BUSINESS

● **We avoid conflicts of interest and, if they occur, we manage them appropriately**

A conflict of interest is a situation which may arise when employee's interests do not coincide, or do not appear to coincide, with Alestis' ones.

As part of this organisation, we must make our professional decisions on the basis of fair and objective criteria, taking into account Alestis' interests both, in the exercise of our activity and in our relations with third parties, such as clients, suppliers, other employees, etc. We should not allow ourselves to be influenced by personal interests or considerations.

Therefore, we all must avoid situations of conflicts of interest, either positional and material ones, by openly declaring their existence in order to facilitate their correct management.



● **We ensure transparency and appropriateness of financial reporting**

At Alestis, we must ensure that all transactions of economic significance carried out on behalf of the company are clearly and accurately recorded in appropriate accounting records that give a true and fair view of the transactions carried out.

Alestis' accounting and financial records and reports must accurately reflect our financial position and the results of our operations.

In preparing financial information, we are required to follow accounting rules and principles with accuracy and integrity and to have adequate internal processes and controls to ensure that accounting and financial reporting is complete, reliable and complies with all applicable legal requirements.

Conducts aimed at avoiding tax obligations or obtaining benefits to the detriment of the tax authorities, social security and equivalent bodies are expressly prohibited.

# IN OUR BUSINESS

## ● Relations with customers and suppliers

We must treat with fairness and integrity all persons with whom we come into contact in the course of our business. This includes, among others, our customers, suppliers, competitors, etc.

Maintaining ethical behaviour in our relations shall not be limited to commercial or contractual ones, but extended to any type of professional contact we have in the course of our activity (formal and informal meetings, presentation of proposals, contracting processes, etc.).

## ● Relations with institutions, authorities and officials

Our relationship with institutions, public administrations and all kind of public authorities shall be governed by the principles of collaboration, transparency and independence.

Interactions with public administration personnel or other public bodies must be carried out by Alestis personnel only if necessary within the exercise of their functions.

These interactions are particularly sensitive due to the risk of incurring in cases of influence peddling, bribery, favourable treatment, etc., which is why persons involved in them must be duly trained and correctly supervised.

## ● We promote fair and honest competition

Alestis is committed to fair and honest competition and to complying with the applicable laws in the countries and territories in which it operates, and therefore, does accept under any circumstances misleading or fraudulent conducts that could constitute unfair competition.

Competition laws in force are complex, cover a wide range of behaviours (e.g. agreeing prices, exchanging strategic information with competitors, etc.) and their scope can vary from place to place, so in case of any slightest doubt, it is essential to consult how to react or to take the correct action.

***What we achieve is important;  
how we achieve it is critical***

# WITH OUR ASSETS

We must apply the utmost diligence in the custody and conservation in the use of Alestis' and third parties' assets. This principle applies not only to tangible ones, such as facilities, tools, equipment, etc., but also to intangible elements, such as information, intellectual or industrial property, etc.

We must all use these resources in the development of our activities in an honest, responsible, safe and appropriate manner, making used of them just for the purpose for which they have been assigned to us and complying with the rules that may be applicable in specific cases.

## We protect Information and confidentiality of records

Generated and accumulated information by Alestis is one of the most valuable assets and therefore, it must be subject to special protection. This information, regardless of its nature, that is, whether economic, commercial, organisational, technological or of any other kind, may not be used for private or personal gain, whether for profit or not, nor may it be passed on to persons outside the company or to other entities, without the express authorisation of the Company.

Without prejudice to the confidentiality restrictions applicable in each case, all of us who form are part of Alestis must transmit the information that needs to be communicated, internally and externally, truthfully and completely. In addition, in the course of our business, we have access to confidential information from third parties (our customers, suppliers and other stakeholders), over which we have an ethical and professional obligation to protect.

Therefore, all those who, for professional reasons, have access to information regarding other employees or information obtained from other companies, whether they are clients, subcontractors, suppliers or other companies in general, shall keep it confidential and use it responsibly.

Misappropriating confidential information or communications between third parties, as well as disseminating or disclosing their content, constitutes a conduct which is contrary to our values, so Alestis will not be tolerate it.

### How do we ensure the correct treatment of our information?

By protecting the confidentiality of records (information on employees, customers, suppliers and other stakeholders) that shall remain restricted to those who have a "need to know", which means that this kind of information can only be disclosed to employees or authorised external parties, in a formal manner, and only if they need it for a legitimate business purpose or by regulatory mandate.

At the same time, the confidential treatment we give to the information must be proportional, avoiding over-zealousness that could hinder the development of the business itself.

In this sense, it is important to catalogue and classify the information, so that we are all clear about how it should be treated and thus avoid overprotective behaviour by mistake or that seeks to take advantage of the restriction on access to information for personal gain.



# WITH OUR ASSETS

**● We respect and protect intellectual property**

As a technological company, Alestis particularly recognises the value of intellectual and industrial property in all its forms (know-how, patents, designs, trademarks, industrial secrets, etc.).

Therefore, we actively protects our own intellectual and industrial property rights and respect third parties' ones, and will not tolerate any conduct that may infringe these rights.

In this regards, Alestis prohibits the use of unauthorised files or programs without the appropriate licence, as they may entail serious risks to the security of our systems and may even constitute an event of infringement.

**● We protect our reputation and corporate image**

Reputation and corporate image are very valuable assets for Alestis, as they allow us to develop and preserve the trust of both the people who make up the company and its stakeholders (customers, suppliers, partners, authorities and society in general).

We are all responsible for looking after the image and reputation of Alestis. We must therefore avoid situations that could undermine or jeopardise them.

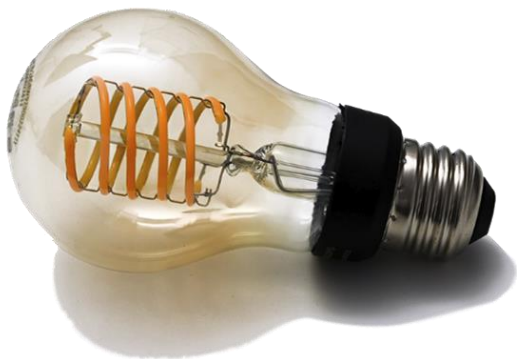
In this regard, coordination and interrelation with the media will be led at all times by the Communication Department.

**● We ensure the privacy and correct treatment of personal data**

Nowadays, the management of any company requires guaranteeing the protection of personal data of employees and third parties in the context of a wide range of daily operations.

Alestis is committed to protecting the privacy of individuals and to complying with the data protection laws in force, ensuring the exercise of the individual rights associated with them and guaranteeing their correct processing.

All personal data are treated in a restrictive manner, collecting only those ones that are strictly necessary and limiting access to them to persons authorised by their functions, to the extent necessary for this purpose.



# WITH OUR ENVIRONMENT



**“Many small people, in small places, doing small things, can change the world”**  
Eduardo Galeano

## **We are committed to our community**

"Corporate Social Responsibility (CSR) is a way of managing companies based on managing the impact of their activities on their customers, employees, shareholders, local communities, the environment and society in general".

[Corporate Social Responsibility Observatory]

Alestis' commitment to society is materialised in the development and promotion of initiatives focused on improving the quality of life and well-being of communities where it operates, by sponsorship, partnering with local stakeholders and other forms of collaboration.

These actions must be carried out in accordance with internal regulations and must be carried out in a transparent manner, always pursuing the general interest.

## **We are environmentally responsible**

We are aware of the impact of our activity on the environment.

In this sense, at Alestis we are committed to carrying out sustainable business practices that respect the environment, being our obligation to minimise the impact of our activity, efficiently manage waste, and conserve and economise energy and other resources.

# WHAT TO DO IN THE EVENT OF AN INCIDENT?

As the correct answer is not always the most obvious one, we should all **report to the Ethics and Compliance Department** any concerns or issues that may arise in relation to regulatory compliance and the provisions of this Code.


## What am I obliged to?

Our conduct must be aligned with the applicable regulations, with our Code of Ethics and with the policies and processes that may be derived from the Code.

All Alestis employees have a duty to report in good faith any unlawful conduct, irregularities or breaches of which we are aware or of which we have reasonable grounds for suspicion.

Whistleblowing, as well as helping to detect possible irregularities, is an essential tool for the Code of Ethics to be fully effective and to continuously improve our prevention system.

Reporting in good faith implies providing honest, complete and accurate information, acting in the rational belief that the facts or indications are true, even if it is later found to be wrong.

This duty is accentuated in those conducts identified in this document with this icon  as they may also involve the commission of a criminal act. No employee should think that he or she is acting in the interests of the company when concealing a fact or incident that could violate the law or this Code of Ethics.

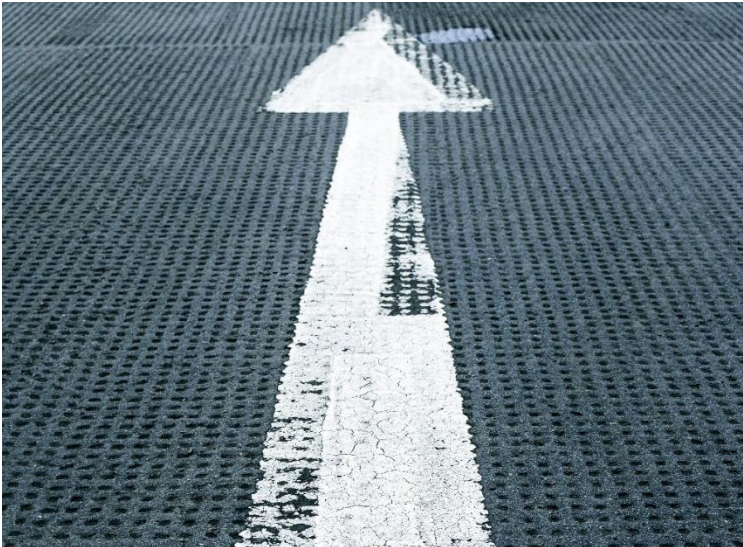
Attempting to benefit or obtain a benefit for Alestis or following instructions from a superior will never be sufficient justification for committing a criminal act or conduct proscribed in this Code.

If we are in doubt when we identify an irregularity, we should contact Ethics and Compliance Department.

Compliance is not an option, it is the only option.



**In the event of any suspicion of criminal or irregular conduct, we must immediately contact the Ethics and Compliance Department.**





# E&C CHANNEL

E&C Channel is a tool available to all Alestis employees and to any interested third party, which allows arising queries or doubts related to the Code of Ethics and to communicate, in a good faith basis, any fact that could contravene this Code, internal regulations or applicable legislation.

E&C Channel is exclusively managed by Alestis Ethics and Compliance Department.

## E&C Channel's assurances

- ✓ **Confidentiality:** Alestis guarantees absolute confidentiality of both, information and personal data provided, so that the persons involved in the management of queries and complaints and who must have access to the information, always on a "need to know" basis, are obliged to maintain strict confidentiality in all its aspects.
- ✓ **Absence of retaliation:** Alestis has its own Non-Retaliation Protocol where it expressly prohibits in its the adoption of any type of retaliation against anyone who reports possible irregular behavior in good faith.
- ✓ **Presumption of innocence:** the person/s against whom any complaint is directed shall enjoy the relevant presumption of innocence, until their responsibility and/or authorship is proven in relation to the reported facts, following an appropriate investigation.
- ✓ **Absence of value judgements:** the team in charge of management, investigation and analysis of the communication will refrain from making any value judgement in relation to the reported facts, carrying out its functions in an impartial and objective manner.

Personal data provided in communications send through E&C Channel are fully subject to the legislation in force on the protection of personal data.

## E&C Channel communication lines

Queries and complaints can be made through any of the following lines of E&C Channel:

- ✓ **E-mail:** [eyc@alestis.aero](mailto:eyc@alestis.aero)
- ✓ **Postal mail:** Ctra. N-339, km. 1,5 (c/ Barriada del Avión); 41300 La Rinconada (Seville), Spain; to the attention of the E&C Department.
- ✓ **Personally or by telephone,** to any of the members of the E&C Department.
- ✓ **Digital platform**



## How can I contribute?

By transmitting by example and by cooperating in the creation of a healthy working environment that favours carrying on conducts in accordance with the content of this Code of Ethics.

We must not forget that the right answer is not always the most obvious one, so the Ethics and Compliance Department will always be at your disposal to help you achieve that answer.



# CONSEQUENCES OF NON-COMPLIANCE WITH THE CODE OF ETHICS

We must apply self-control in our actions and decision-making, requiring ourselves` conducts to be ethically acceptable, legally valid and desirable for Alestis, for our clients and for society generally speaking, holding responsible for it.

Violating the Code of Ethics is considered a serious offence, which entails consequences for the offender and/or for those who, being aware of the violation, do not report it.

It is important to note that following orders from a superior will not be an excuse to avoid one's own responsibilities, nor will breaking the rules under the pretext of seeking a benefit for Alestis. If any of these circumstances arise, we must report the existence of such orders and circumstances through E&C Channel.

Alestis will not tolerate, and will prosecute and establish the appropriate sanctions for any conduct that may constitute a breach of the Code, without prejudice to any administrative or criminal sanctions that may also result.



# DISSEMINATION, COMMUNICATION AND TRAINING

All persons subject to the Code of Ethics are obliged to know and comply with its content and collaborate in its implementation.

In order for all Alestis employees, as well as stakeholders and any other interested third parties to be aware of and to comply with the content of this Code, it is published on several internal communication channels and on the corporate website ([www.alestis.aero](http://www.alestis.aero)).

From an internal point of view, the Code of Ethics will be the subject of specific training, awareness-raising and sensitisation actions to ensure that it is understood and put into practice.

## UPDATE

The initial version of the Alestis Group Code of Ethics was approved by the Board of Directors of Alestis Aerospace, S.L. on June, 30<sup>th</sup>, 2015.

On November 18<sup>th</sup>, 2021, the Board of Directors approved its first revision, which is the version currently in force.

With this update, Alestis adapts its Code of Ethics to new regulatory requirements, to improvements arising from compliance reviews and to best practices.





# ALESTIS

AEROSPACE

**Alestis Aerospace, S.L.**  
Ctra. N-339, km. 1,5 (c/ Barriada del Avión)  
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