



CODE OF CONDUCT

AMAC AEROSPACE

GROUP OF COMPANIES



This document relates to AMAC Aerospace Group of companies. When referencing “AMAC” in this document, it should be considered as referencing any single or collective entities including but not limited to:

AMAC Aerospace Switzerland
AMAC Aerospace Turkey
AMAC Aerospace Saudi Arabia
AMAC Corporate Jet
JCB Aero
Gamit Limited

INTRODUCTION

This code of conduct applies to all AMAC employees regardless of their position and among AMAC Group of Companies and to the full supply chains.

This Code has been drafted to be used as a guide internally and externally and to be used as a standard personal and business code of conduct.

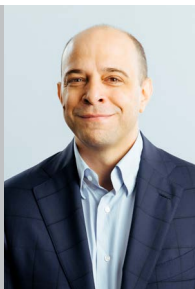
AMAC is committed to collect its core values in these guidelines that shall be circulated to and adhere to by AMAC employees, its suppliers and vendors.

Each AMAC employee shall honor these values and commit to the applicable laws, rules, and regulations. If they do not understand it, they shall seek guidance. Priority shall be given to safety, quality, and integrity and the 'speak-up policy' shall be preserved. Each employee will be respectful to other employees and third parties, harassment is not tolerated. No one shall engage in any activity that creates a conflict of interest for any individual or for the company, and will protect any sensitive information they are entrusted with. Any illegal or unethical conduct shall be reported immediately to management, no one will be blamed for having spoken up.

PROCUREMENT LEADERSHIP TEAM

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threat to health, safety or life.



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AMAC CODE OF CONDUCT

AMAC Group of Companies adhere to this Code of Conduct and expect its vendors and suppliers to adhere to 'the conduct' and to ensure the information of principles to their own suppliers.

WAGES, WORKING HOURS

AMAC expects its suppliers to pay its workers with at least the minimum compensation settled by law and provide any legally mandated benefits, including for overtime payment. Suppliers shall provide their employees with regular hours of work, rest periods and annual leave.

HUMAN RIGHTS

AMAC expects its suppliers to respect and preserve human rights and shall not engage or be complicit in human rights abuse. This apply to supplier's own workers and those working for them. Supplier shall identify and take proper step(s) to remedy any adverse human right impacts.

CHILD LABOUR

AMAC expects its suppliers to insure that illegal child labor is not used in the performance of the work. The term "child" refers to any person under the minimum legal age for employment where the work is performed, and/or the minimum working age defined by the International Labor Organization (ILO), whichever is higher.

HARRASSMENT

AMAC expects its suppliers to ensure that their employees work in an environment of dignity and respect, free from physical, psychological, sexual, and verbal harassment, intimidation or other abusive conduct.

MODERN SLAVERY

AMAC expects its suppliers to prevent any involvement in all forms of modern slavery, including human trafficking and forced, bonded, or indentured labor. All work should be voluntary on the part of the employee. We expect suppliers to provide all employees with a written contract in a language that the employee

understands clearly indicating their rights and responsibilities with regard to wages, working hours, benefits, and other working and employment conditions. Suppliers must not destroy, conceal, confiscate, or otherwise deny access to any form of employee identification (e.g. passports or work permits) as a condition of employment, unless required by applicable law. Suppliers must not charge employees fees, recruitment costs, or deposits, directly or indirectly, as a precondition of work.

Suppliers must respect the right of workers to terminate their employment after reasonable notice and to receive all owed salary. Suppliers must respect the right of workers to leave the workplace after their shift.

DISCIPLINARY MECHANISM

AMAC expects its suppliers to have an employee disciplinary process in place to address concerns regarding employee work, conduct or absence. Suppliers are expected to have a grievance mechanism for employees to raise a workplace problem or concern or to appeal a disciplinary decision.

SOCIAL DIALOGUE

AMAC expects its suppliers to 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. Suppliers are expected to recognize and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing within the appropriate national legal framework.

DISCRIMINATION

AMAC expects its suppliers to ensure equality of opportunity and treatment in respect of employment and occupation without discrimination as may be recognized under the applicable laws and regulations.

HEALTH AND SAFETY

AMAC expects its suppliers to ensure safety of the workplaces, machinery, equipment and processes. Chemical, physical and biological substances under the control of the suppliers shall not represent a risk to health when appropriate measures are taken. Suppliers shall provide adequate protective clothing and protective equipment, as reasonably practicable, to prevent risk of accident.

ENVIRONMENTAL, HEALTH & SAFETY MANAGEMENT SYSTEM

AMAC expects its suppliers to have an environmental policy that complies with applicable legislation for the protection of environment, to conduct their business in a manner that actively manages environmental risks across their operations, products, and supply chain. Suppliers are expected to reduce their climate change impact, improve their efficiency of usage of energy, water and natural resource, minimize waste and use of hazardous materials, dispatch goods in an adequate outer packaging and foster reusable / recycled packaging materials such as reduced usage of single used plastic and responsibly manage their air emissions.

AMAC expects its suppliers to conduct their business in a manner that actively manages environmental risks across their operations, products and supply chain. An appropriate environment management system (shall be put in place, including policies and procedures aimed at effectively managing their environmental performance, including integrating environmental considerations into their product design or service.

AMAC expects its suppliers to establish an appropriate health and safety management system (e.g) including policies aimed at protecting the health, safety and welfare of employees, contractors, visitors and others who may be affected by their activities by striving to eliminate fatalities, work-related injuries, health impairment and limiting exposure to safety hazards. Suppliers should take reasonable steps to provide a hygienic working environment and must ensure that employee's performance and safety is not impaired by alcohol, controlled substances, legal and illegal drugs.

PRODUCT SAFETY

AMAC expects its suppliers to comply with all laws and regulations governing product safety and quality, and to deliver products and/or services that conform to such product safety and quality standards. AMAC expects its suppliers to have established quality assurance processes to identify and defects and implement corrective actions.

CONFLICT MINERALS

AMAC expects its suppliers to exercise due diligence on the source and chain of supply of minerals sourced from conflict-affected and high-risk areas, to make sure sourcing does not contribute to direct or indirect financing of armed groups or contribute to serious human rights abuses.

AMAC expects its suppliers not to engage in the sale of manufacture of anti-personnel mines or components used in their production.

CHEMICAL AND HAZARDOUS USES

AMAC expects its suppliers to notify regularly any updated information regarding chemical composition of their products to preserve its safe usage and regulatory compliance; and to stay informed on current emerging global chemical regulations to ensure production continuity.

AIR EMISSIONS

AMAC expects its suppliers to monitor, control and treat air emissions of volatile organic, chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products as generated from operations and before disposal.

RECYCLING

AMAC expects its suppliers to reduce or eliminated waste of all types, including water and energy, at the source by means of modifying production and standard processes.

RESPONSIBLE SOURCING

AMAC expects its suppliers to comply with applicable laws regarding sourcing of critical and conflict materials, and to provide products made from responsibly sourced materials. Suppliers shall support efforts to eradicate the use of any minerals which are financed or benefitted to armed groups that are perpetrators of serious human rights abuses. Due diligence shall be conducted by suppliers.

RECORDS MONITORING

AMAC expects its suppliers to create, store and maintain business records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. Suppliers are expected to have in place appropriate related controls to ensure the above activities are accurately and securely performed.

All records, regardless of format, made or received as evidence of a business transaction must fully and accurately recorded and show a means to the transaction or event being documented. Records should be retained based on the applicable retention requirements.

COUNTERFEIT

AMAC expects its suppliers to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of counterfeit parts and materials being delivered. Effective processes should be in place to detect, report and quarantine counterfeit parts and materials and to prevent such parts re-entering the supply chain. If counterfeit parts and/or materials are detected or suspected, suppliers should provide immediate notification to the recipients of such counterfeit parts and/or materials.

COMPLIANCE WITH LAW

AMAC expects its suppliers to comply with all laws and regulations applicable to their business, including the local laws and regulations of all countries outside their home country in which operations are managed or services promoted/provided.

BRIBERY AND CORRUPTION

AMAC expects its suppliers to comply with all anti-corruption laws and regulations applicable to the performance of its obligations and activities in its relationship with AMAC. Suppliers shall conduct reasonable due diligence to prevent and detect bribery and corruption in all business arrangements, including partnerships, the engagement of contractors and sub-contractors, joint ventures, offset agreements, and hiring of third-party intermediaries, such as agents or consultants.

CONFLICT OF INTERESTS

AMAC expects its suppliers to avoid all conflicts of interest or situations giving the appearance of a conflict of interest. Suppliers must provide immediate notification to all affected parties in the event that an actual or potential conflict of interest arises.

COMPETITION AND ANTITRUST

AMAC expects its suppliers not to enter into formal or implied anti-competitive arrangements that fix prices, collude, rig bids, limit supply or allocate/ control markets. They must not exchange current, recent, or future pricing information with competitors. Suppliers must not participate in a cartel or any activity that would unlawfully restrain or impact competition.

GIFTS

AMAC expects its suppliers to compete on the merits of their products and services. Suppliers must not use the exchange of business courtesies to gain an unfair competitive advantage. In any business relationship, suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by applicable laws and regulations, and that these exchanges do not violate the rules and standards of the recipient's organization, and are consistent with reasonable marketplace customs and practices. No cash gifts or cash equivalent should be offered or accepted.

ILLEGAL AND IMPROPER PAYMENT

AMAC expects its suppliers not to offer, directly or indirectly, any illegal or improper payments to, or to receive any illegal or improper payments from, any customer, supplier, their agents, representatives, and/or others. We expect suppliers to prohibit their employees from receiving, paying, and/or promising sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage. This includes a prohibition on so-called "facilitation" or "grease" payments intended to expedite or secure performance of a routine governmental action, such as obtaining a visa or customs clearance, unless there is a formal legal governmental fee schedule for such expediting services and the government provides receipts. Personal safety payments are permitted where there is an imminent threat to health, safety or life.

INSIDER TRADING

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

FRAUD AND DECEPTION

AMAC expects its suppliers to not engage in fraud, deception, or misleading conduct, or allow others acting on their behalf to do so. This includes defrauding or stealing and any kind of misappropriation of property or information.

IMPORT AND EXPORT

AMAC expects its suppliers to ensure that their business practices are in accordance with all applicable laws, directives, and regulations governing the import and export (including re-export) of parts, components, software, technical data, and services. Suppliers must provide accurate and complete information and obtain authorizations where necessary.

PAYMENT OF TAXES

AMAC expects its suppliers to ensure that they comply with all applicable tax laws and regulations in the countries where they operate and be open and transparent with the tax authorities. Under no circumstances should suppliers engage in deliberate illegal tax evasion or facilitate such evasion on behalf of others.

TIMELY PAYMENT

AMAC expects its suppliers to be fair and reasonable in their payment practices and pay undisputed and valid invoices on time, in accordance with agreed contractual payment terms and conditions.

SANCTIONS

AMAC expects its suppliers to ensure that their business practices are in accordance with all applicable laws, directives, and regulations governing embargoes, sanctions and economic sanctions.

CONFIDENTIALITY

AMAC expects its suppliers to ensure that all sensitive, confidential and proprietary information is appropriately protected. This includes personal data/information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures. AMAC expects its suppliers to comply with all applicable data privacy laws and regulations. Suppliers must report to AMAC any suspected or actual data breach or security incident(s) as soon they are aware of it.

INTELLECTUAL PROPERTY

AMAC expects its suppliers to comply with all the applicable laws governing intellectual, property right assertions, including protection against disclosure, copyrights, trademarks and other protected rights derived from specialized works/products/services coming from AMAC. Websites, photo and videography are wholly owned, produced and protected under AMAC's legal name.

SPEAK-UP

AMAC expects its suppliers to provide employees and third parties with access to adequate reporting channels to seek advice or raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting.

CONSEQUENCES OF VIOLATING THE CODE

In the event that the expectations of this Code are not met by AMAC vendors or suppliers, the business relationship may be reviewed and corrective action pursued subject to the terms of the related procurement contract(s).



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