





E.I.S. AIRCRAFT Group

Headquarters Euskirchen

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Code of Conduct

E.I.S. AIRCRAFT Group

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Introduction

The E.I.S. Aircraft Group develops and manufactures custom-made components and provides services for the civil and military aviation sector.

We are a successful, dynamic and fast growing enterprise. More than 300 employees at six locations offer our customers a comprehensive portfolio of solutions. Each of our services is individually tailored to meet the demands and requirements of our customers and complies with the highest quality demands.

The relationship to our customers is characterized by a high degree of reliability and strict confidentiality throughout the entire project. Trust is an important cornerstone for long-term customer relationships. Apart from our technical products or services and the comprehensive expertise of our staff members, financial stability and transparency of the enterprise are essential prerequisites for our successful partnerships.

Our employees are the base of our success. In our internal and external daily interaction we rely on sincerity, trust and mutual respect. Strong personal commitment and high-level personal initiative are a matter of course, as is the willingness to constantly learn and develop personal skills to the benefit of our customers.

We operate our business in line with the applicable legislation, standards and regulations.

We have summarized and codified for all our employees the existing principles in our Code of Conduct. These principles do not only apply to in-house cooperation, but also to our conduct vis-à-vis our external partners and customers.

All employees of the E.I.S. Aircraft Group are bound to comply with the contents of this Code of Conduct. The Management is responsible for acting as a role model to all intents and purposes, particularly in monitoring the lawfulness of any conduct exercised on behalf of the E.I.S. Aircraft Group and appropriately supporting our corporate culture in terms of professional attitude, ethics and compliance.

Goals and Applicability



General Standards and Values

Goals

The Code of Conduct is a binding orientation and decision-making guideline for all staff of the E.I.S. Aircraft Group as well as our direct business partners.

The Code of Conduct documents the standards and values of our enterprise. The adherence to these standards and values plays an essential part in creating a positive image for the E.I.S. Aircraft Group, its products/services and employees and secures a long term reputation.

The principles specified in the Code of Conduct ensure that laws, regulations, standards and contractual obligations are observed.

Applicability

The Code of Conduct is applicable worldwide for the E.I.S. Aircraft Group and all its organizational entities, as well as for its direct business partners. The regulations are binding for all staff members.

All business partners and sub-contractors of the E.I.S. Aircraft Group must comply with the respective national statutory regulations, in particular for provisions concerning labor and social law, plus environmental directives. The Code of Conduct comes into effect with its publication and will be binding for an unlimited period.

Observance of laws

The E.I.S. Aircraft Group respects and complies with all applicable legislation, and we expect the same from our business partners.

All staff members of the E.I.S. Aircraft Group are obliged to comply with the applicable legislation. We respect and accept our staff members' constitutionally guaranteed fundamental right of freedom of association and collective bargaining.

Corruption

We do not tolerate any kind of corruption, bribery, acceptance or granting of benefits, nor do we engage ourselves in such activities. Any basis of such criminal acts is eliminated by the high transparency of our business processes.





Equal opportunities

We commit to fight any form of discrimination due to gender, race, age, skin color, religion, marital status, sexual orientation, origin, mental or physical disabilities or other characteristics and to protect those who are in need of extra safeguarding. We do not tolerate employees being disadvantaged, regardless of the reason.

We respect the personal dignity, private sphere and personal rights of every employee. Interaction with one another is open and honest, characterized by mutual respect and responsibility.

Human rights

We comply with and respect human rights within our sphere of influence.

Standards when dealing with business partners

When dealing with business partners our employees represent the E.I.S. Aircraft Group, its products and services. The principles established in accordance with the Code of Conduct of the E.I.S. Aircraft Group must always be respected and observed.

In the course of business all staff members, as well as business partners should act in such a way that no personal dependencies, obligations or other conflicts of interest arise. Gifts or invitations shall only be made or accepted if such practice is in line with courtesy, conventions or traditions of the respective country. It has to be ensured that no relationships of dependency are generated and that national legal standards and international provisions are observed.

Business relationships with relatives or other related parties should be avoided as far as possible. In case these cannot be avoided, they shall be made transparent and the direct superior shall be informed.

With regard to the business relationships of the E.I.S. Aircraft Group we seek to ensure that every party involved in the value chain can be successful. This applies to direct business partners, as well as suppliers.





Occupational Health and Safety



The E.I.S. Aircraft Group ensures that all legal and internal regulations relating to working hours, as well as to occupational health and safety are observed and complied with.

For health and occupational safety reasons it is strictly prohibited for all employees to carry or consume alcohol or drugs at their workplace or on the entire premises.

Work equipment is used with care and working hours are used efficiently. In the light of the economical, legal and social conditions we continuously work on preventative measures in the fields of occupational health & safety and environmental protection. Occupational safety and health promotion is anchored in the company processes and supports every individual employee in actively safeguarding their own health.

Continuous risk and emergency management secures our processes in the case of emergency or breakdown and supports safe operation and restart, if required.

Environmental Protection



One of our prime concerns is to be aware of the use and handling of natural resources: energy, water, soil and air. As part of the development process we take into consideration the entire product lifecycle from project planning through production and supply to waste disposal. Here it is important for us to control the use of operating, auxiliary and raw materials.

Constantly improving our environment- and energy-related services is the basis for our contribution to the greatest possible environmental protection.





Corporate Appearance and Communication

External media communication (print, online, radio and TV) always requires close coordination with the top management. Any financial communications of the E.I.S. Group shall be exclusively made by the top management. Communication shall always be correct, unambiguous, transparent and in compliance with applicable directives.

For any communication with authorities beyond the normal responsibilities of the respective employee the company top management must be involved.

In external e-mails a precise and updated signature plus the disclaimer released by the management must be used at all times.

Secrecy aspects must always be observed for external and internal communication. Therefore every employee must check attachments and prior messages before e-mails are forwarded.

The E.I.S. Aircraft Group will only make charitable donations. No donations will be granted to political institutions or parties.

Handling Corporate Property



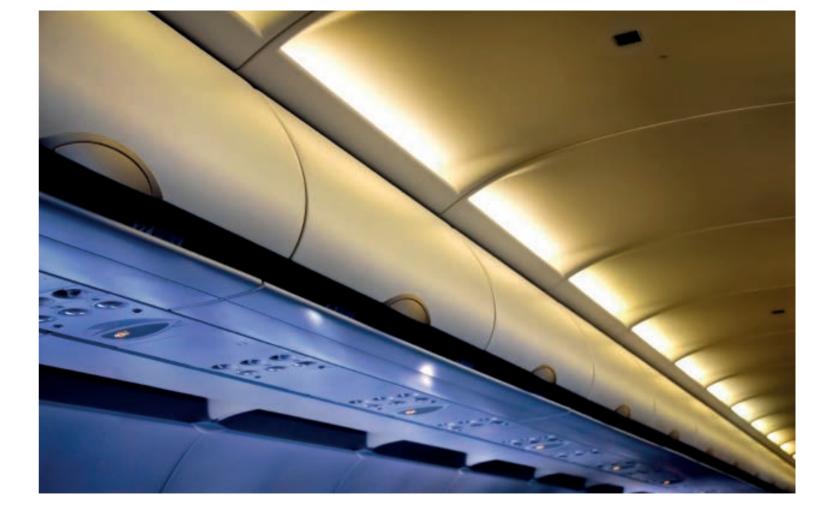
Every employee shall handle all corporate property provided with care and caution.

Without previous approval of his/her superior an employee may not sell, lend, lease or dispose of corporate property. The use of the same other than for direct business purposes also requires approval.

Colleagues' property is to be respected and care is to be taken for its protection and preservation.

Company data shall always be treated with the respective responsibility, confidentiality and in compliance with the confidentiality agreements of the respective customers, legal regulations and applicable privacy policies.

The use of any corporate information or any other information of operational matters is exclusively permitted as part of and for the purpose of the normal course of business. The publication or provision of such data and information is prohibited and will be legally sanctioned.





Privacy, Confidentiality, Information Security



The E.I.S. Aircraft Group recognizes the various requirements in terms of corporate and IT security, as well as data privacy protection. The E.I.S. Aircraft Group observes all statutory requirements.

It is a fundamental principle of ours that security and data privacy protection are duties of all executive staff members and of every individual employee. Transparency concerning the purpose and impact of data collection and storage, as well as the awareness for working with such data is most important for us.

We protect our company against the risks and threats by means of appropriate technology. Organizational and technical security standards govern the implementation. We protect our business with state-of-the-art technical solutions.

Despite the best possible technical security, the basis of effective data protection can only be ensured by the responsible handling of data and information by each individual employee entrusted or accessible to him or her.

Corporate Processes



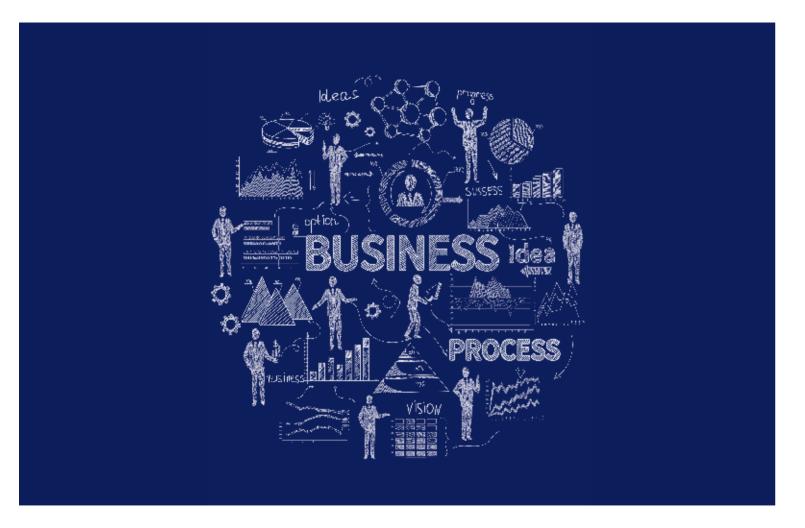
The most important goal of the E.I.S. Aircraft Group, with all their employees and business partners, it is to align with our customers' requirements.

To meet these requirements we ensure the highest level of quality in our products and services. This is achieved by constantly improving all corporate processes and our range of services offered. In this respect we involve our business partners in all matters of quality and environmental management, occupational safety and improvement of economic efficiency.

By means of this continuous innovation process, we ensure sustainable high customer benefit. Our focused information policy, as well as proactive education and training programs are an investment in the competence and motivation of our employees.

This encourages the awareness of all employees to take an active part in corporate processes and make a contribution to our corporate success. All our executive staff act in the awareness of their exemplary role.







We work along the lines of integrity and impartiality, in accordance with professional practice and free from any internal and external constraints. Our corporate processes are organized and controlled based on the documentation published in our intranet/share point as well as the continual management assessment by our Advisory Board based on defined target values. In order to adapt to permanently changing requirements, annual targets are defined, necessary actions implemented and continuous success monitored.

The company management commits to strictly monitor the compliance of the corporate processes, constantly upgrade these as needed and stringently meet all legal, regulatory and normative requirements.

Reporting violation of the Code of Conduct:



Should you become aware of any violation of laws or of our corporate principles - whether in our company or one of our business partners - it is your duty - as a conscientious employee - not to ignore, but to report such an incident in the interest of our company.

Therefore, in such cases members of the Management, Human Resources, as well as the Workers' Council are there for you in person, by telephone or via usual communication channels.

Management is obliged to immediately investigate any incident reported and to take the necessary corrective actions.

Your information will be treated in strict confidence.

There shall be no form of disadvantage for staff members reporting an infringement. This, of course, will also apply if, upon examination, the circumstances turn out to be uncritical

Euskirchen, March 2016

Sven Achilles

CEO

Thomas Sturm

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Head of HR

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