

Code of Conduct

Corporate Policy

Code of
Conduct

Function

Legal
HR

Reviewed

July 2024

Approved by

July
2024

WHY WE HAVE A CODE?

This Code of Conduct sets out the key principles and values that must be implemented and followed by each employee, trainee, external co-worker (interim, sub-contractor, consultant, etc.), director, and manager of AviaPro Consulting in their day-to-day work.

This Code of Conduct, which has been endorsed by the senior management of AviaPro Consulting reinforces our zero-tolerance attitude towards any form of corruption and influence peddling by making integrity an inherent part of our business culture.

Therefore, when in doubt, you are strongly encouraged to seek advice or to raise concerns with your management.

Any breach of our compliance rules may result in civil and/or criminal proceedings against AviaPro and against the individuals involved. Such individuals will also be subject to appropriate disciplinary sanctions.

It is our responsibility to maintain and nurture a compliance culture based on the principle of “Speak Up.” We are committed to ensuring that all employees feel empowered to report any unethical behavior or violations of this Code without fear of retaliation.

Thank you for your commitment to upholding the highest standards of integrity and ethical behavior in your work at AviaPro Consulting.

TABLE OF CONTENTS



2023 / 2024

INTRODUCTION 04.

CORE VALUES 08.

WORKPLACE & PEOPLE 10.

BUSINESS PRACTICES 14.

GET IN TOUCH 23.



INTRODUCTION



INTRODUCTION

TO WHOM THIS CODE OF CONDUCT APPLIES

This Code of Conduct applies first and foremost to all AviaPro Consulting employees and directors, regardless of their job title, responsibilities, seniority, or location, within every department and office.

Additionally, AviaPro Consulting promotes the adoption of strong ethical standards amongst our stakeholders, including customers, suppliers, partners, and contractors.

This Code of Conduct has been shared with our employees and will reside on our website for ease of accessible to management, staff, directors, and all stakeholders, who we encourage to adopt similar standards.

SPEAK UP CULTURE

AviaPro Consulting is committed to maintaining a Speak Up culture by promoting open and trusting dialogue with employees at all levels.

All employees are encouraged to express their views, defend their opinions, and point out unacceptable behavior, especially behavior that violates this Code of Conduct. Employees can raise concerns to their line manager.

AviaPro Consulting protects those who Speak Up and raise concerns appropriately and in good faith; we do not retaliate against anyone who raises a concern or those who assist in investigations of suspected violations.

ROLE OF THIS CODE OF CONDUCT

This Code of Conduct is designed to provide a clear understanding of AviaPro Consulting's expectations and standards for ethical behavior and responsible business practices.

When in doubt, we encourage you to seek advice and to "Speak Up" to disclose any situation that may violate laws, internal policies, or standards.

If you are a team leader or manager, you have a particular responsibility to create an environment where team members feel confident and able to raise concerns. Listen carefully to their concerns and take appropriate action in response.

EMPLOYEE



- **Assume Personal Responsibility:** Perform your duties with fairness and integrity.
- **Commit to Company Objectives:** Strive to achieve the company's objectives to the best of your abilities, making decisions that align with the Code.
- **Understand and Review the Code:** Have a basic understanding of the Code and review it periodically. You should also have detailed knowledge of the provisions that specifically apply to your job.
- **Seek Assistance:** Request assistance when faced with an ethical issue or if you have any questions about the Code.

If you become aware of a possible violation of the Code, we expect you to:

Report Violations Promptly: Promptly and in good faith report the possible violation to your management.

Follow Up on Reports: If you reported the possible violation to your management and have reasonable grounds to believe that it was not investigated, report your concern to the CEO.

Cooperate in Investigations: Be prepared to cooperate in investigations regarding violations of the Code.

MANAGER



- **Know the Code in Detail:** Thoroughly understand the Code and actively promote it in the workplace.
- **Lead by Example:** Provide a model of high standards of ethical conduct, creating a work environment that reflects the content and spirit of the Code.
- **Support Employees:** Offer support to employees confronted with ethical issues by guiding them in determining the right conduct to adopt.
- **Apply the Code:** Ensure the Code is applied by recognizing good conduct and identifying undesired conduct.

- **Be Vigilant:** Prevent, detect, and respond to any violations of the Code.
- **Protect Whistleblowers:** Protect those who report violations from retaliation.



CORE VALUES



VALUES

WE ARE GUIDED BY THE FOLLOWING CORE VALUES IN ALL WHAT WE DO AT AVIAPRO

1.

Integrity

We act with honesty and integrity, maintaining the highest ethical standards in all our dealings.

2.

Respect

We treat everyone with respect and dignity, fostering an inclusive and supportive work environment.

3.

Excellence

We strive for excellence in all our activities, continuously improving our services and operations.

4.

Sustainability

We are committed to sustainable practices that minimize our environmental impact.

5.

Innovation

We encourage innovation and creativity, leveraging technology to enhance our services.



WORKPLACE
&

PEOPLE



POLICIES I

DIVERSITY & INCLUSION

- We respect, value, and promote diversity and inclusion within our workforce, as well as among our customers, suppliers, and in the global marketplace.
- Our policy is to comply with all applicable laws and to provide equal employment opportunities without regard to factors such as race, color, religion, gender, national origin, ancestry, age, disability, marital status, or sexual orientation. This commitment ensures a respectful and inclusive environment where everyone can thrive.

HARASSEMENT-FREE

- We are committed to providing a workplace free of all types of harassment. Harassment includes any conduct that creates an intimidating, offensive, or hostile working environment or that interferes with work performance.
- We do not tolerate the harassment of our employees and are dedicated to ensuring an environment that protects employees from harassment in the workplace. Our commitment to a respectful and supportive work environment is fundamental to our values and operations.



POLICIES II

HEALTH, SAFETY & SECURITY

- We are committed to providing a healthy environment and promoting safe and productive work practices. We adhere to all occupational health and safety laws, regulations, and rules applicable to our business and operations.
- We maintain a zero-tolerance policy for violence or threatening behavior, and the use of drugs and other controlled substances for reasons other than prescribed medical purposes, in the workplace. Our dedication to these principles ensures a safe and supportive environment for all employees.

CONFLICT OF INTEREST

- We recognize that as employees, we have a contractual obligation and duty to our organization. As such, we must avoid any activity that is or has the appearance of creating a conflict of interest.
- It occurs when an individual's private interest interferes or appears to interfere with the interests of AviaPro Consulting. We never use or attempt to use our position to obtain any improper personal benefit for ourselves or others. Maintaining transparency and integrity in all our actions is essential to upholding our commitment to ethical conduct.



POLICIES III

RECRUITMENT & EMPLOYMENT

- We are committed to maintaining fairness and objectivity in our employment practices. In situations where family members or close personal friends are recruited, we ensure they are not employed in the same work unit where an immediate supervisory relationship would exist. This policy prevents any influence, input, or decision-making power over an individual's performance evaluation, salary, potential for promotion, conditions of work, or similar matters.
- Our commitment to these principles helps maintain a professional and unbiased workplace for all employees.





BUSINESS PRACTICES



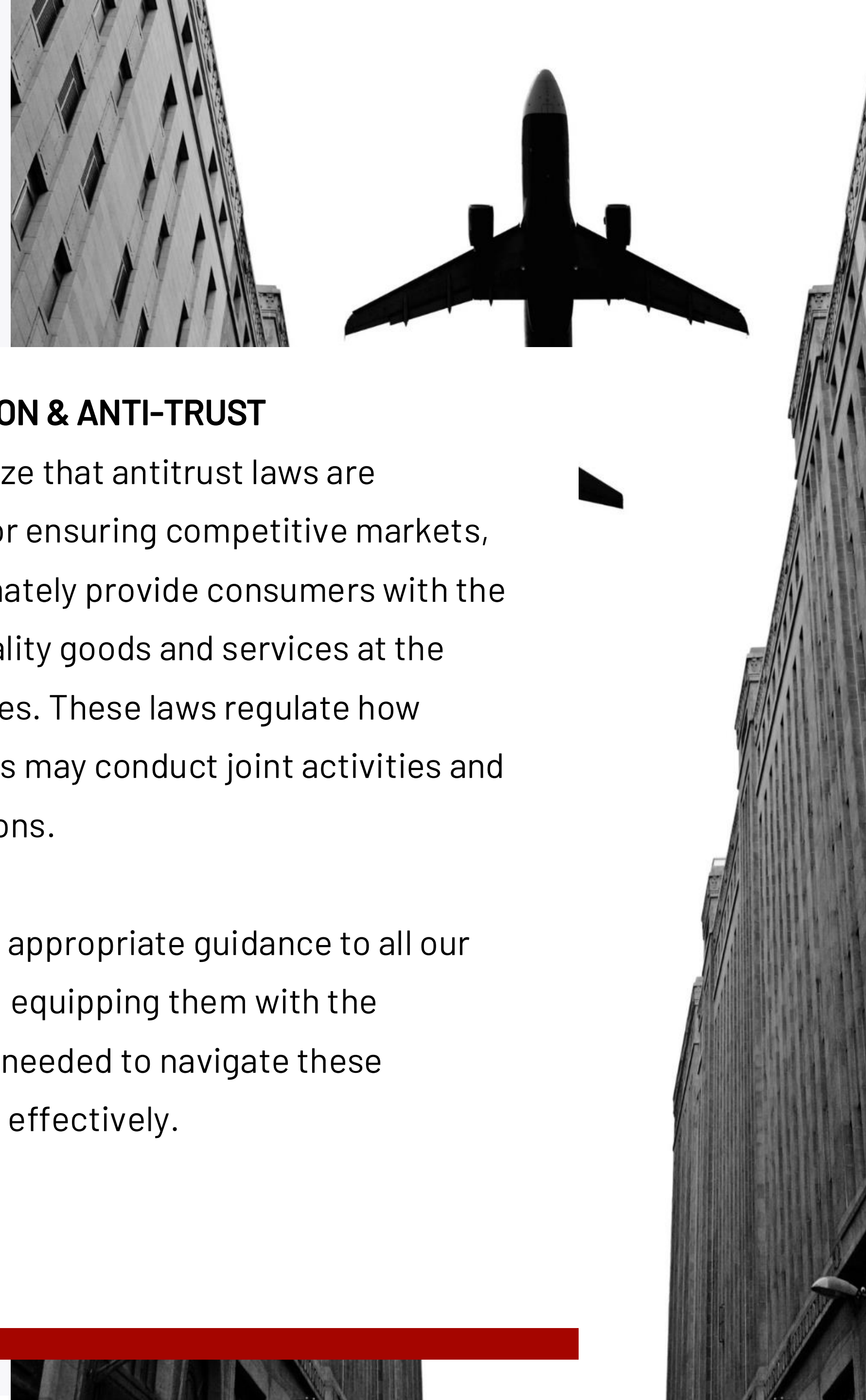
PRACTICES I

COMPLIANCE WITH LAWS

- We are committed to complying with all applicable laws, regulations, and standards. It is the responsibility of each employee to understand and adhere to the legal and regulatory requirements relevant to their duties.
- We ensure that we are well-acquainted with the legal and regulatory requirements relevant to our business responsibilities and diligently fulfill our duties in accordance with these standards. Each employee is expected to stay informed and committed to maintaining the highest level of compliance in all aspects of our work.

COMPETITION & ANTI-TRUST

- We recognize that antitrust laws are essential for ensuring competitive markets, which ultimately provide consumers with the highest quality goods and services at the lowest prices. These laws regulate how competitors may conduct joint activities and collaborations.
- We provide appropriate guidance to all our employees, equipping them with the knowledge needed to navigate these regulations effectively.



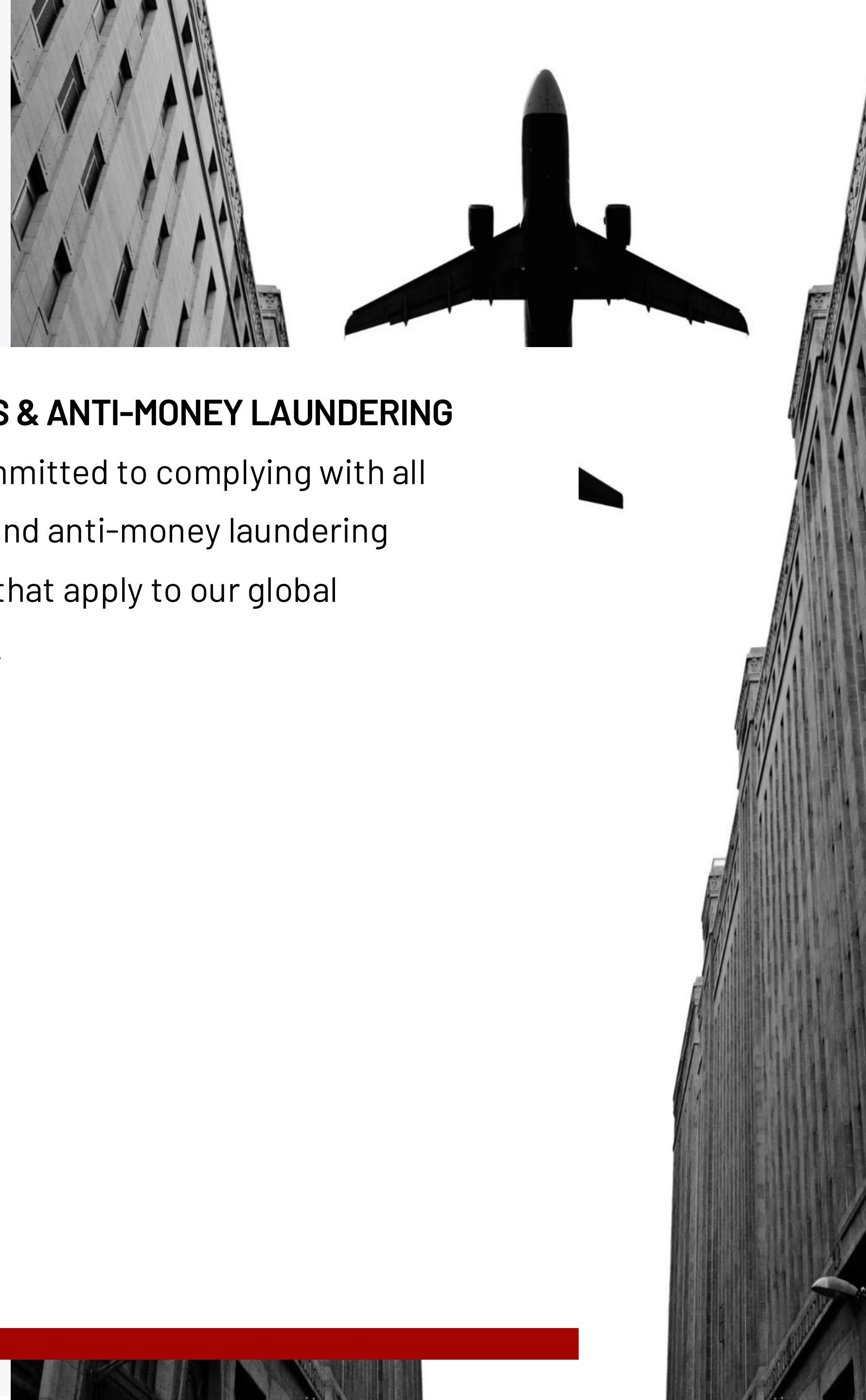
PRACTICES II

SUPPLIERS & BUSINESS PARTNERS

- We are committed to conducting business with integrity and adhering to the highest anti-corruption standards.
- We do not accept or offer bribes, either directly or through a third party, regardless of nationality or local custom. A bribe is defined as 'anything of value' given to someone with the intent of obtaining favorable treatment from the recipient.
- Our commitment to these principles ensures that we maintain the trust of our clients, partners, and the communities we serve.

SANCTIONS & ANTI-MONEY LAUNDERING

- We are committed to complying with all sanctions and anti-money laundering legislation that apply to our global operations.



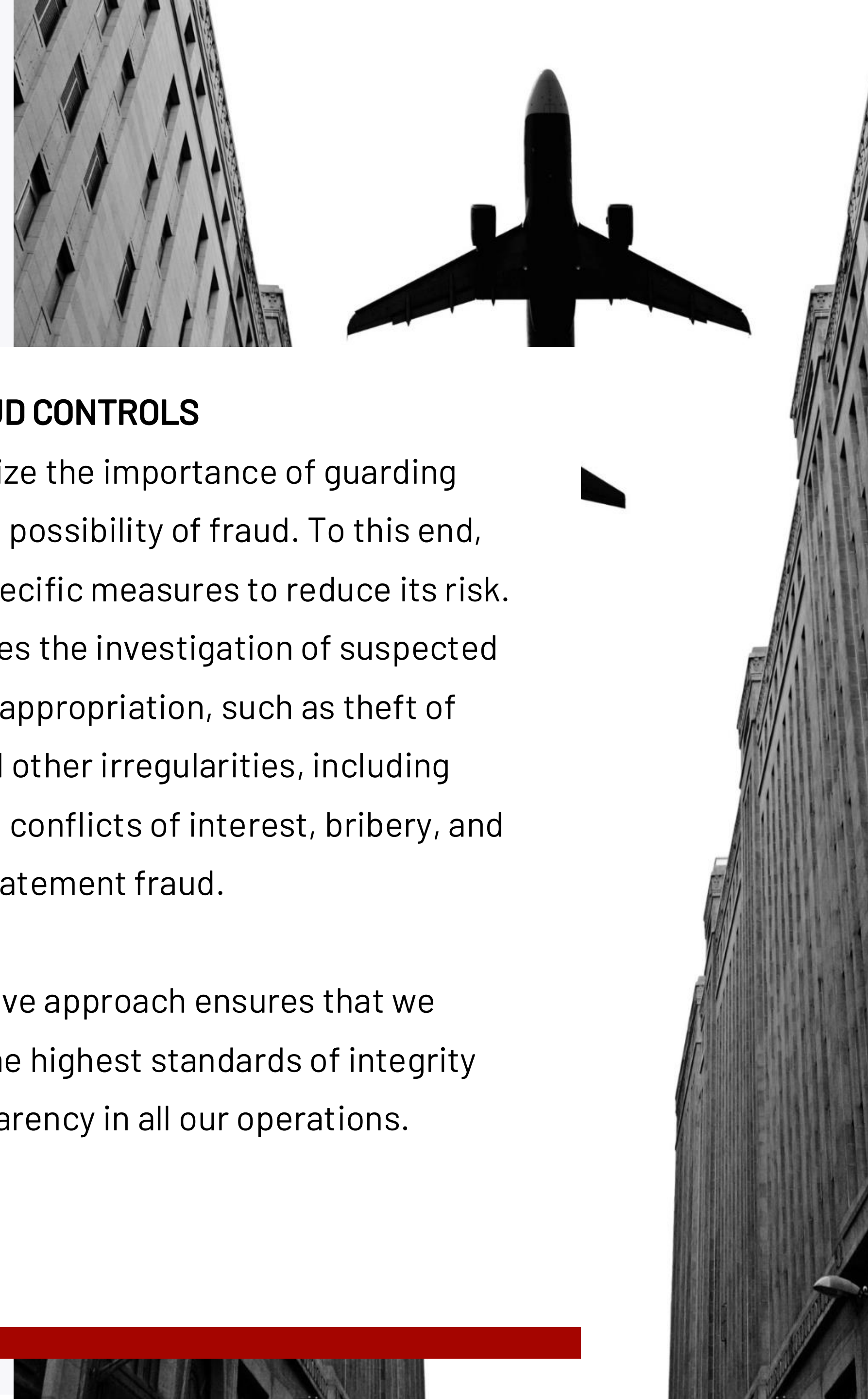
PRACTICES III

SUPPLIERS & BUSINESS PARTNERS

- We promote and maintain relationships with suppliers and business partners that are cooperative, fair, and transparent.
- We expect our suppliers and business partners to conduct their business in a manner that is consistent with our Code of Conduct. This alignment ensures that together, we uphold the highest standards of integrity and ethical behavior.

ANTI-FRAUD CONTROLS

- We recognize the importance of guarding against the possibility of fraud. To this end, we have specific measures to reduce its risk. This includes the investigation of suspected acts of misappropriation, such as theft of assets, and other irregularities, including corruption, conflicts of interest, bribery, and financial statement fraud.
- Our proactive approach ensures that we maintain the highest standards of integrity and transparency in all our operations.



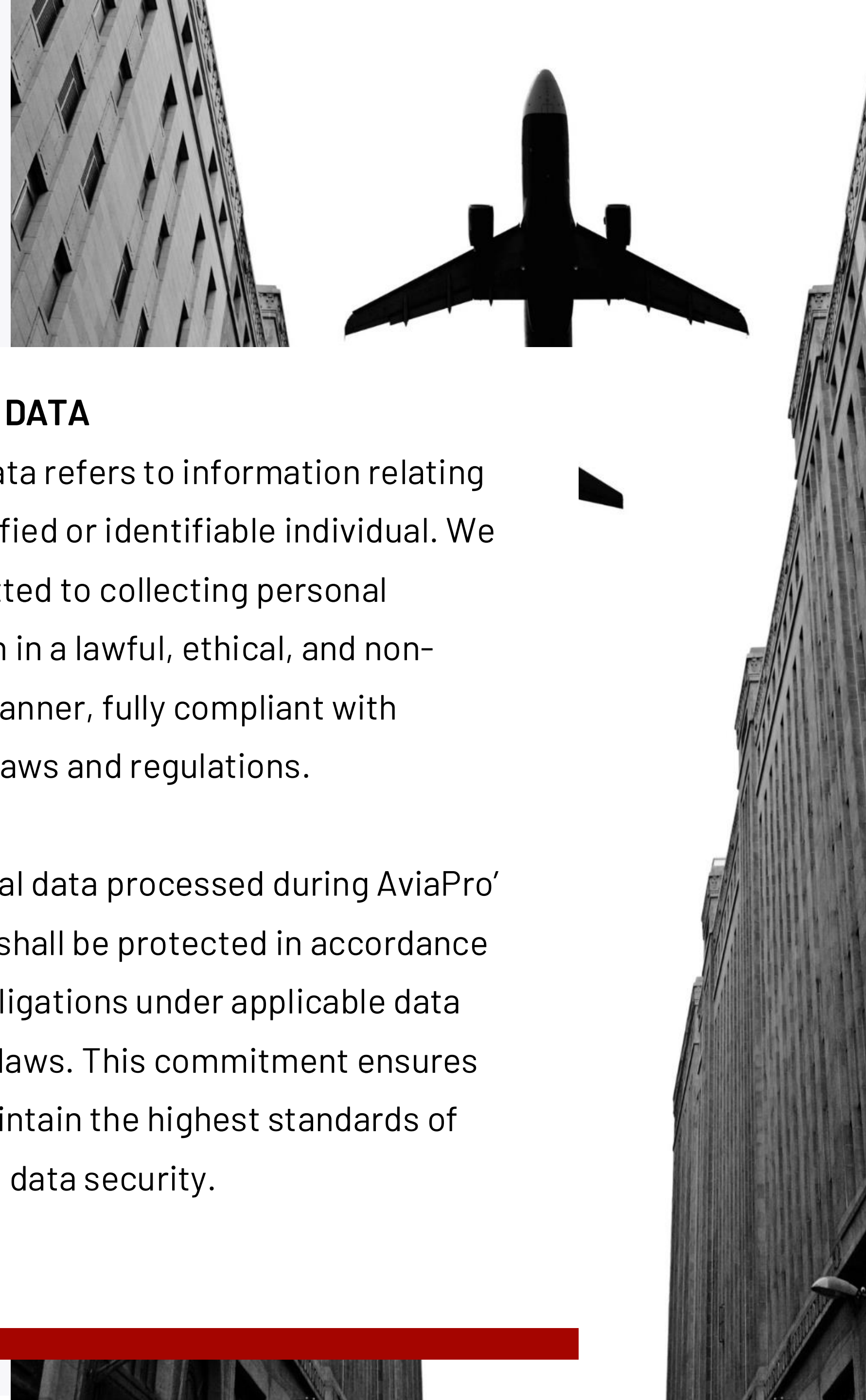
PRACTICES IV

COMPANY ASSETS

- We have an obligation to safeguard AviaPro assets within our care and possession and to use them in the manner they are meant to be used, and in compliance with relevant policies and procedures. We maintain the confidentiality of all information so entrusted to us, except when disclosure is authorized or legally mandated.

PERSONAL DATA

- Personal data refers to information relating to an identified or identifiable individual. We are committed to collecting personal information in a lawful, ethical, and non-intrusive manner, fully compliant with applicable laws and regulations.
- Any personal data processed during AviaPro's business shall be protected in accordance with our obligations under applicable data protection laws. This commitment ensures that we maintain the highest standards of privacy and data security.



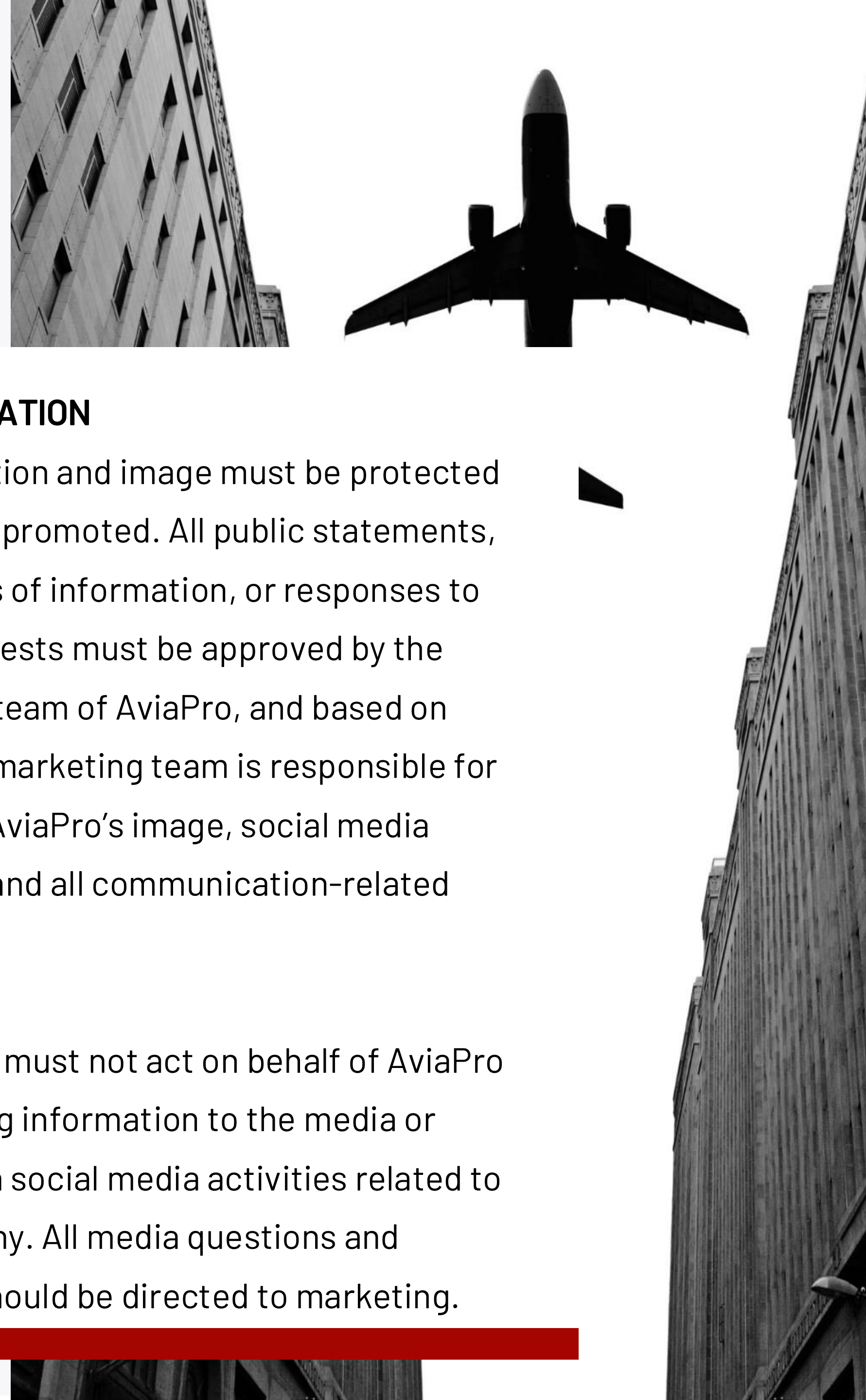
PRACTICES V

ENVIRONMENT & SUSTAINABILITY

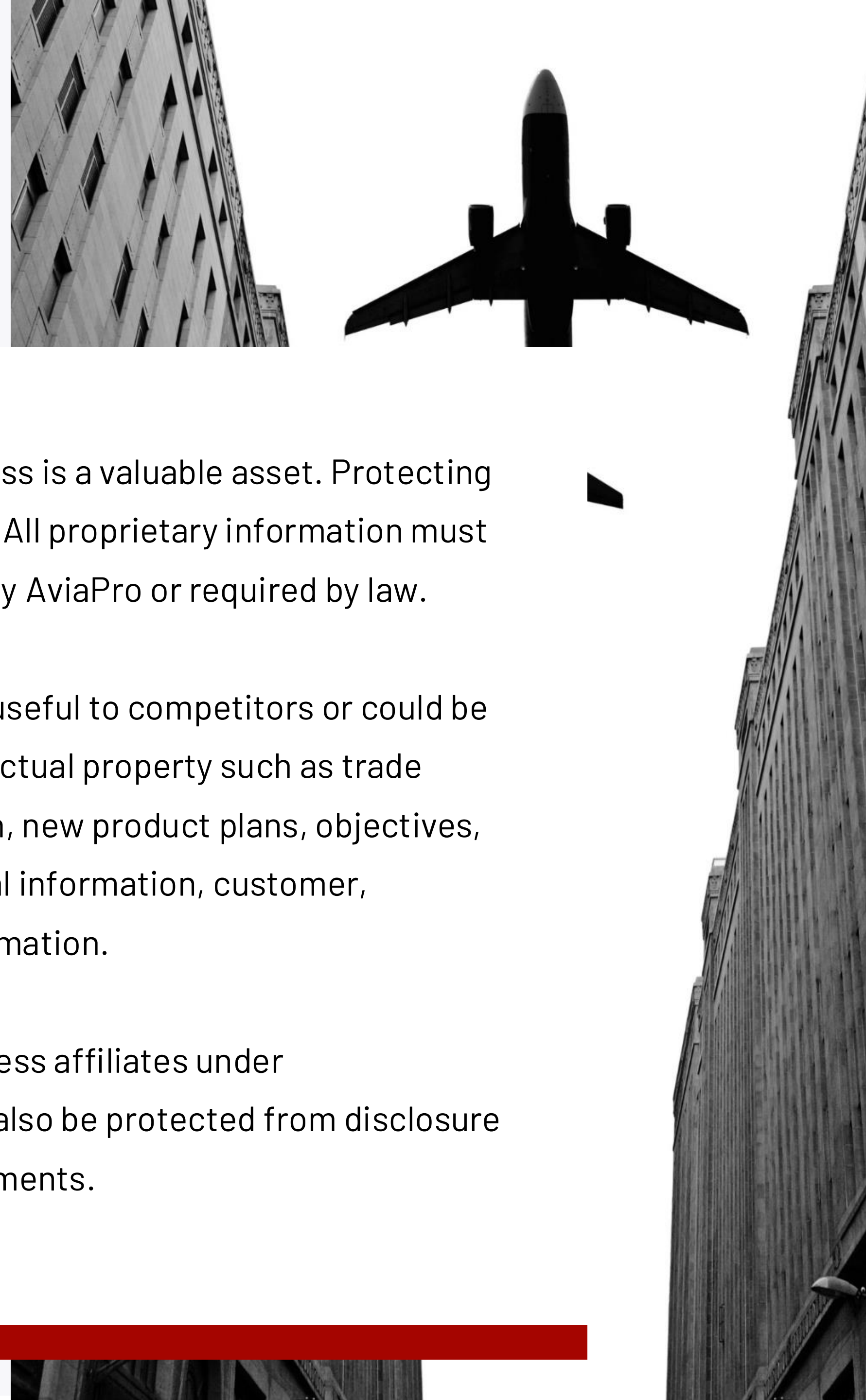
- We are committed to the shared aim of the aviation industry , and we actively collaborate with industry partners and other stakeholders to deliver real consulting solutions in the fields of sustainable aviation fuels, technology, infrastructure, policy, and finance. Our dedication ensures that we contribute meaningfully to a sustainable future for aviation.

COMMUNICATION

- Our reputation and image must be protected and always promoted. All public statements, disclosures of information, or responses to media requests must be approved by the marketing team of AviaPro, and based on facts. The marketing team is responsible for managing AviaPro's image, social media presence, and all communication-related matters.
- Employees must not act on behalf of AviaPro by providing information to the media or engaging in social media activities related to the company. All media questions and inquiries should be directed to marketing.



PRACTICES VI



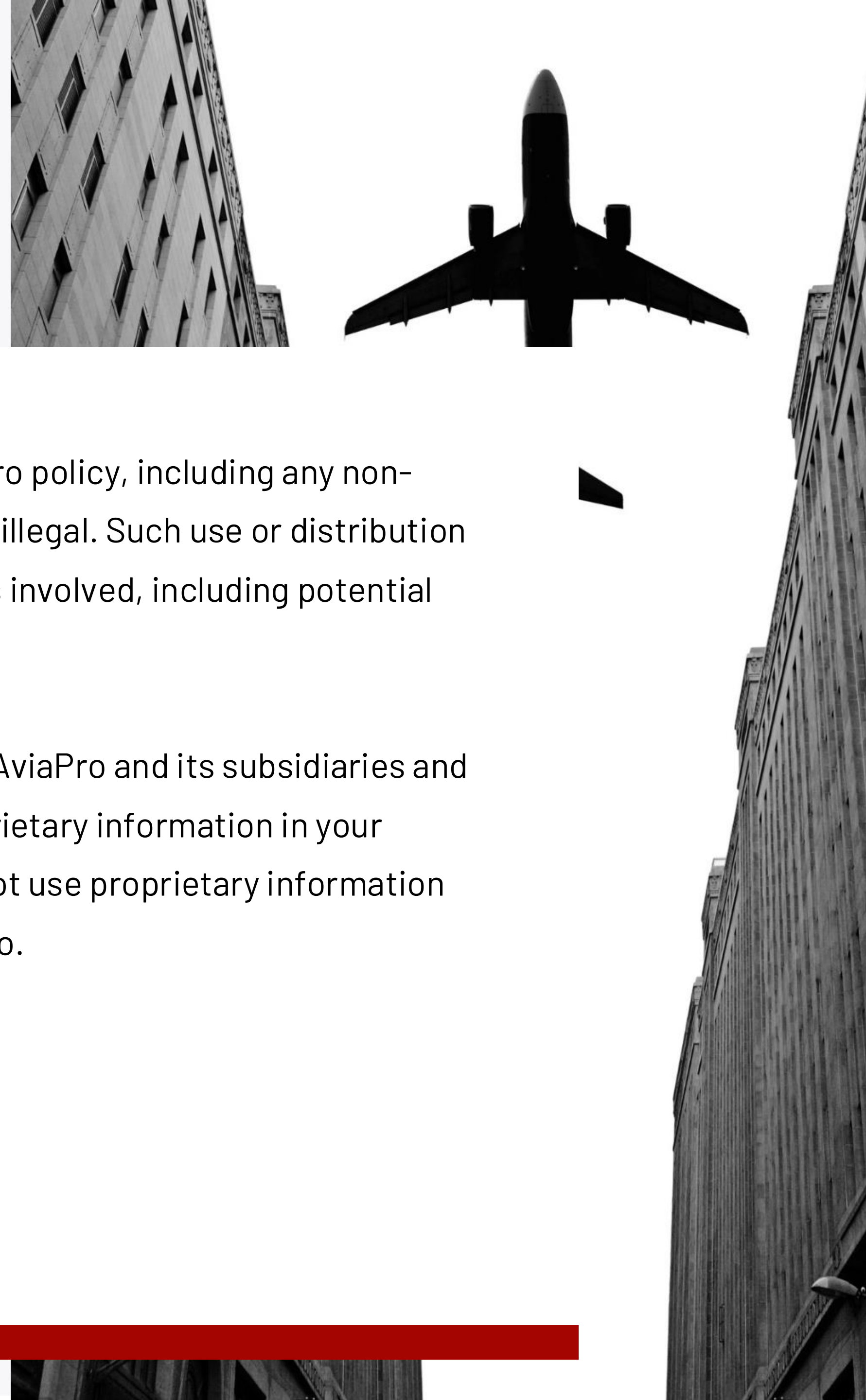
CONFIDENTIAL & PROPRIETARY INFO

- Confidential proprietary information generated and gathered in our business is a valuable asset. Protecting this information is crucial for our continued growth and competitive edge. All proprietary information must be maintained in strict confidence, except when disclosure is authorized by AviaPro or required by law.
- Proprietary information includes all non-public information that might be useful to competitors or could be harmful to AviaPro or its customers if disclosed. This encompasses intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business research, new product plans, objectives, strategies, records, databases, salary and benefits data, employee medical information, customer, employee, and supplier lists, and any unpublished financial or pricing information.
- Additionally, we frequently receive proprietary information from our business affiliates under confidentiality agreements and other agreements. This information must also be protected from disclosure and used only for its intended purpose and as permitted under such agreements.

PRACTICES VII

CONFIDENTIAL & PROPRIETARY INFO

- Unauthorized use or distribution of proprietary information violates AviaPro policy, including any non-disclosure agreements employees have signed with AviaPro, and could be illegal. Such use or distribution could result in adverse consequences for both AviaPro, and the individuals involved, including potential legal and disciplinary actions.
- Your obligation to protect the proprietary and confidential information of AviaPro and its subsidiaries and affiliates continues even after you leave AviaPro. You must return all proprietary information in your possession upon leaving AviaPro. Similarly, employees and officers may not use proprietary information from previous employment in connection with their employment at AviaPro.



FINAL NOTE

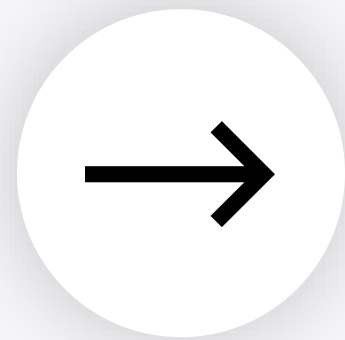
AviaPro Consulting will take appropriate disciplinary action in response to any violation of this Code. Individuals who violate the Code may also expose themselves to possible civil damages or criminal penalties. Retaliation of any kind against an individual who reports concerns in good faith violates AviaPro principles and will not be tolerated.

Our employees are granted the needed empowerment for reporting any observed or suspected violations. This ensures that all employees feel safe and supported in maintaining the highest standards of integrity and ethical behavior.



CONTACT US

GET IN TOUCH



Let's chart your path for success.

[Contact AviaPro](#) to get started!

Our Address

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Follow Us

[linkedin.com/aviaproconsulting](https://www.linkedin.com/company/aviaproconsulting)
[x.com/AviaPro_](https://twitter.com/AviaPro_)

Office Hours

Monday - Saturday
08:00 - 20:00





THANK YOU

We trust this code of conduct has provided valuable insights. To learn more about how AviaPro can empower your aviation success, please visit our website or scan the QR code.

