



BUSINESS PARTNERS CODE OF CONDUCT



MESSAGE FROM THE CEO

For Tarmac Aerosave, ethics and compliance are the watchwords that must guide everyone's daily actions. A real guarantee of trust with partners, they are the guarantee of healthy and lasting relationships.

We undertake to act in compliance with all the legislation that applies to our activities and to conduct our strategy by integrating the 10 principles of the United Nations Global Compact, which sets out fundamental standards in the areas of human rights, labor, the environment, and the fight against corruption.

Far from being a marginal phenomenon, breaches of probity are numerous and sometimes difficult to detect. That is why we call on all our partners to be vigilant.

We attach great importance to establishing business relationships with people and organizations that share the same high ethical standards and adopt a responsible vision in social and environmental matters.

Tarmac Aerosave is committed to working only with partners who share its standards of ethics and integrity. This Partner Code of Conduct sets out the principles we expect of them, including in the areas of compliance, human rights, the environment and anti-corruption.

A responsible approach to business is essential to operate successfully and to create long term value for our clients, employees, shareholders, and other stakeholders. We believe that for corporate responsibility to be more than just a declaration of intent it must be embedded.

Alexandre BRUN

Chief Executive Officer

Code's aim

The Partners' Code of Conduct (the Code) aims to present Tarmac Aerosave's ethical values and commitments in the conduct of its business. This tool also aims to describe the company's expectations of its partners.

It complements the Code of Ethics and Compliance to allow clearer and easier dissemination of information to all our partners. It is essential that everyone takes this

information into consideration and applies these values on a daily basis. Tarmac Aerosave encourages all its partners to disseminate the commitments to their third parties.

This code aims to disseminate the ethical values required by Tarmac Aerosave in its business relations. As a true guide, it sets out professional practices aimed at establishing healthy and lasting relationships.

Scope of application

This code is a mandatory requirement for doing business with Tarmac Aerosave. It applies to all our Business Partners and their employees. Business Partners are defined as, but not limited to, the following entities:

- Customers ;
- Service provider ;
- Agents ;
- Consultants ;
- Intermediaries ;
- Suppliers ;
- Public Authority ;
- All other similar parties that provide goods or services to, for or on behalf of Tarmac Aerosave.

Sanctions

In the event of a violation of the principles of this Code, the partner is exposed to several convictions: civil and criminal convictions with very severe penalties including heavy fines and, in some cases, prison sentences. The loss of any commercial agreement with Tarmac Aerosave and therefore the termination of the contract.

Finally, behaviour that is far removed from any ethical consideration often leads to damage to the company's reputation and numerous prohibitions that impact its activity for many years.

Labor

Combating child labor

Tarmac Aerosave acts in accordance with France's commitments to combat child labor. Tarmac Aerosave believes in the right of every child to be protected from economic exploitation and respects the law of each country in which it operates regarding minimum hiring age for its employees. All our partners must ensure that no child contributes

directly or indirectly to their work and must respect the minimum legal age for employment in all countries where they are established.

The United Nations Convention on the Rights of the Child, 20 November 1989

Minimum Age ILO Convention, 1973 (No.138)

Worst Forms of Child Labor ILO Convention, 1999 (No. 182)

Forced labor

Forced labour is a violation of the fundamental human right to work freely and to choose one's work. All forms of forced labour are prohibited by Tarmac Aerosave. The employment relationship is based on the mutual consent of the contracting parties and implies that either party may leave the employment relationship at any time, subject to reasonable notice, in accordance with national legislation or the

collective agreement. The withholding of identity documents, the absence of payment of wages or the existence of threats or pressure is rejected in all its forms. Tarmac Aerosave expects the same high standards from its partners.

Forced Labor ILO Convention, 1930 (No. 29)

Abolition of Forced Labour ILO Convention, 1957 (No. 105)

Work hours

Respect for working time is essential in order to guarantee high productivity while preserving the workers physical and mental health. Tarmac Aerosave undertakes to comply with the legislation relating to working hours in the country where the company is located. Tarmac

Aerosave expects its partners to carry out their activities considering the working time laws of the countries where they operate.

Weekly Rest (Commerce and Offices) ILO Convention, 1957 (No. 106)

Weekly Rest (Industry) ILO Convention, 1921 (No. 14)

Wages

In accordance with international wage standards, Tarmac Aerosave defends access to a decent and regular wage. All our partners undertake to pay remuneration in accordance with the legislation of the countries in which it operates and apply the same policy regarding

employee benefits. Our partners also undertake to pay salaries at regular intervals and not to use deductions from pay as a disciplinary weapon.

Protection of Wages ILO Convention, 1949 (No. 95)
Minimum Wage Fixing ILO Convention, 1970 (No. 131)

Equal opportunity and non-discrimination principle

Tarmac Aerosave is an equal opportunity employer. Employment opportunities are available without distinction of race, colour, sex, religion, age, disability, or other status protected by law.

This principle applies to all aspects of the employment relationship: recruitment, hiring, training, work assignment, promotion, transfer, separation, and salary administration.

Gender equality is one of the key elements of our equal opportunities policy. We reject any form of discrimination in this regard. As an

international company, Tarmac Aerosave is naturally made up of employees, customers, candidates, and suppliers from multiple origins. We see diversity as an asset and encourage the wide range of perspectives and opportunities that diversity brings. Our partners must share the same vision, promote equality, and encourage diversity in all its aspects.

Equal Remuneration Convention, 1951 (No. 100)
Discrimination (Employment and Occupation) ILO Convention, 1958 (No.111)

Freedom of expression

All our partners must imperatively respect this key principle, which is regulated at national, European, and international level. Freedom of expression is a prerequisite for healthy labor relations as it ensures fearless communication between employees and their supervisors about all aspects of work. This freedom of expression is extended to the status of whistleblower, which is regulated and protected by law.

While complying with the country's legislation, Tarmac Aerosave respects the freedom to belong to the union of their choice.

European Convention on Human Rights, 1953 – Article 10
Freedom of Association and Protection of the Right to Organize ILO Convention, 1948 (No. 87)
Right to Organize and Collective Bargaining ILO Convention, 1949 (No. 98)

Health and safety

Our approach

Protecting people's health and safety and the environment are core values of Tarmac Aerosave in conducting its activities and are treated with equal importance of other key business objectives. Identifying, assessing and

preventing occupational risks is a top priority for Tarmac Aerosave. We pursue continuous improvement in all HSE related aspects and strive to operate responsibly by building a sustainable business model.

Employee health and safety

Employees health and safety is an integral part of our culture. Tarmac Aerosave is committed to providing a safe and healthy working environment for its employees, contractors and visitors in accordance with the commitments of the United Nations and the fundamental conventions of the International Labor Organization. Tarmac Aerosave is committed to taking appropriate measures to prevent incidents or injuries within the company in compliance with applicable laws and regulations, protecting worker safety and the environment. Employees must be able to

perform their tasks safely. Everyone must fully comply with safety regulations and policies and be prepared to implement emergency preparedness plans. Any practice considered dangerous must be reported so that Tarmac Aerosave can act. Tout accident lié au travail, quelle que soit sa gravité, doit être signalé sans délai. Any work-related accident, regardless of its severity, must be reported immediately. We expect our partners to implement all measures to maintain a safe environment.

*Universal Declaration of Human Rights, 1948
Occupational Safety and Health Convention, 1981*

Prohibition of an illegal substances

It is recalled that any possession or consumption of any illegal substance (other than a prescribed drug) is strictly prohibited in the workplace. In order to comply with the safety standards in force within the group, employees must not bring any objects or

substances that could be considered dangerous in the workplace. Specific areas are reserved for smokers on Tarmac Aerosave sites. We expect our partners' personnel working on our sites to comply with health and safety regulations.

Environment

We care about the environment

Tarmac Aerosave is committed to a global environmental approach for all its activities in order to significantly reduce its environmental impact while complying with applicable regulatory requirements. We aim to comply with the following environmental objectives: improve the material recovery rate of an aircraft at the end of its life cycle from year to year, reduce our waste related to our activity by

controlling our waste management processes and by seeking innovation on a daily basis, ensure the monitoring and maintenance of our installations and more particularly that relating to the management of aqueous discharges and promote good environmental practices in order to control operations with high environmental risks and thus guarantee Tarmac Aerosave's sustainability.

Compliance with legal and regulatory requirements

Tarmac Aerosave complies with all environmental laws and regulations relating to environmental protection in force in the countries where the company operates. Tarmac

Aerosave expects its partners to operate all its sites responsibly in order to minimize the impact of its activities on the environment.

Resources management

Tarmac Aerosave strives to prevent or minimize the impact of its activities on the environment. In particular, the protection of nature, the maintenance of biodiversity and ecosystems, the depletion of natural resources and waste and toxic substances management are issues of common concern to all Group employees.

As soon as they join our company, all employees are highly aware of Tarmac Aerosave's various commitments to respect the environment.

We ensure that everyone has the right reflexes on a daily basis and expect our partners to share this commitment.

Confidentiality

Information Protection and Security

Tarmac Aerosave ensures the protection of its information, know-how and, more generally, confidential and strategic information. On a daily basis, we scrupulously monitor the security of our computer network and equipment. All communication through our

social networks is strictly controlled and supervised. Under no circumstances should Tarmac Aerosave's partners speak on behalf of Tarmac Aerosave, write or communicate on Tarmac Aerosave.

Data protection

Tarmac Aerosave respects the privacy of individuals. The inappropriate or unauthorized use of confidential information is strictly prohibited.

Tarmac Aerosave acts in accordance with the General European Data Protection Regulation in force since May 2018 (No. 2016/679, known as the "GDPR"), which aims to strengthen the rights of individuals and make data processors in the European Union more accountable. Tarmac Aerosave is committed to acting transparently in the protection of personal data while respecting the privacy of its business partners and employees. Only the data necessary for its activities are kept by the

company. The group has been actively working on its strategy for implementing the DGMP and has deployed procedures and training to demonstrate the importance it attaches to the data of its partners and collaborators. The partners must be aware of their role in protecting this information and undertake to respect the same level of requirements as the group imposes on itself in this area.

We collect and use data from our business partners exclusively for business management purposes and in accordance with the legal storage period. Only authorized personnel can access this data.

Tarmac Aerosave has adopted a data protection policy.

Intellectual Property

All our partners must ensure compliance with intellectual property legislation, including

protection against disclosure, patents, copyrights, and trademarks.

Anti-Corruption Policy

Compliance with legal and regulatory requirements

Tarmac Aerosave has developed a zero-tolerance policy regarding public or private sector corruption, whether active or passive, direct or indirect. Tarmac Aerosave is committed to be a responsible corporate citizen, having to OECD Guidelines for Multinational Enterprises.

As a responsible group, Tarmac Aerosave requires not only compliance with the standards of the countries where the company is located but also, and above all, compliance

with American (Foreign Corrupt Practices Act 1977), British (Bribery Act 2010) and French (Sapin II) legislation; these three laws having an extraterritorial scope.

All our partners undertake to carry out their activities in accordance with the anti-corruption laws of the countries where they are established, in accordance with international standards and above all by taking the above-mentioned laws into account in their anti-corruption measures.

Our approach

Tarmac Aerosave has a system in place to manage and prevent risks related to corruption in order to ensure compliance with the laws, regulations and applicable requirements set out in this Code. An ethical alert system has also been implemented to facilitate the discovery, investigation and disclosure of unethical facts and other inappropriate and unlawful behaviour. Tarmac Aerosave is committed to

providing training sessions on compliance and anti-corruption requirements. Tarmac Aerosave asks its partners to commit to the highest ethical standards in all their activities for Tarmac Aerosave. All forms of corruption (conflict of interest, facilitation payments, etc.) are seriously rejected by Tarmac Aerosave. We demand from our partners a reciprocal commitment on this theme.

Business gifts and invitations

Tarmac Aerosave's partners must exercise caution when offering or receiving gifts or invitations. Under no circumstances should gifts and entertainment be perceived as an attempt to influence the course of a business decision or likely to be perceived as such. Only low-value gifts or gratuities are allowed. Tarmac Aerosave employees, directors, or Business Partners, are forbidden from giving or promising to give, in exchange for or in order to obtain a contract or any other improper commercial or financial

benefit or any undue advantage, directly or indirectly, any gift or gratuity in cash or any other form, any invitation and entertainment, to any representative of a customer or a supplier or any third party. This prohibition also applies to relations - direct or indirect - with public authorities. In case of doubt, we strongly encourage our partners to contact their compliance department or management if there is any doubt about the acceptance of a gift or invitation.

Facilitation payments

Facilitation payments are prohibited by Tarmac Aerosave. These are relatively minor payments, more by way of a gratuity, made to lower level or government employees. These payments are sought to speed up routine services or administrative actions provided or performed by those individuals.

Although these practices are tolerated in some States, facilitation payments are considered an

act of corruption in most countries and are strictly prohibited.

A partner must never respond favourably to such a request and must inform its compliance department or management directly if it is faced with such a request. There is only one exception to the principle of zero tolerance: if the person concerned by such a proposal is physically threatened.

Conflict of interest

A conflict of interest situation arises when the « private interests” of the staff compete or conflict with the interests of Tarmac Aerosave. We expect our partners to make decisions based solely on commercial relationship

considerations without being influenced by personal interests. Any partner that has identified a potential conflict of interest must immediately inform Tarmac Aerosave.

Fight against fraud

Far from being a marginal phenomenon, fraud is a major risk for companies, regardless of their sector of activity, size, or environment. Tarmac Aerosave fights against fraud, both internal and external, and calls on all its partners to do likewise. Under no circumstances should

partners act through deception, misrepresentation, falsification, or endorsement. The fight against fraud should be everyone's business to be effective and to control this risk.

Maintain accurate books and records

All Tarmac Aerosave partners are committed to keeping clear and transparent accounts in accordance with current legislation. The accounting records must in no way be a means

of concealing fraudulent acts and must reflect clear and unaltered accounting. All accounting documents must be kept in accordance with the legal data storage period.

Integrity in conducting business

Anti-money laundering and combating terrorism financing

Participation in illegal activities (fraud, corruption, trafficking, etc.) may lead to money laundering through intermediary companies. Tarmac Aerosave operates in a transparent manner and is committed to not processing any criminal funds that support illegal activities such as terrorism financing. All precautions will be taken before starting the commercial relationship, considering the integrity of the

partner and his reputation. These precautions include the introduction of a due diligence questionnaire and consultation of the lists of sanctions issued by international bodies (European Union, United Nations, and the Office of Foreign Assets Control - OFAC). Only business relationships with good reputation partners will be validated.

Trade sanctions compliance

All laws and regulations governing commercial practices must be respected by our partners, including financial or trade restrictive measures against certain countries or territories, established by the United Nations, the Council of the European Union, or the Office of Foreign Assets Control (OFAC) in the United States.

These measures take the form of bans and restrictions on trade in targeted goods, technologies or services, measures to freeze funds and economic resources and sometimes restrictions on access to financial services. As American laws have an extraterritorial scope, all our partners are required to be vigilant.

Combating antitrust practises

Tarmac Aerosave asks its partners to act in compliance with the antitrust laws of their respective countries as well as European legislation as mentioned in Articles 101, 102

and 103 of the Treaty on the Functioning of the European Union (TFEU). Suppliers must under no circumstances reach an agreement that may affect the market.

Implementing the Code

Our partners' commitment

Compliance with this Code is mandatory for all our partners. By starting the commercial relationship with Tarmac Aerosave, our partners undertake to respect the values and

policies mentioned in the said Code. This commitment is reflected in the inclusion of an ethics and anti-corruption clause in all contracts with our partners.

Due diligence and control

The implementation of an anti-corruption prevention management program also requires the establishment of a system for evaluating

partners. The validation of our partners is subject to the acceptance of a due diligence questionnaire as a preliminary evaluation.

Treatment of non-compliance

Any breach of this Code of Conduct may result in heavy fines with numerous prohibitions impacting the company's business and reputation for many years to come. In the event of a proven breach and depending on the seriousness of the breach, Tarmac Aerosave will be required to take appropriate measures, ranging from termination of the contract to proceedings before civil and criminal courts. Audits can be carried out to verify the

compliance of our partners with the principles set out in this Code but also and above all to prevent any breach. If Tarmac Aerosave detects a breach of the Code, Tarmac Aerosave shall provide written reasons for its doubts to its partner so that the latter can provide explanations, taking care to provide all documents and/or evidence in order to clarify the situation and find a solution as soon as possible.

Ethical Alert Line

If one of Tarmac Aerosave's partners is confronted with a problem of alleged or proven violation of the rules of the said Code (or more generally of the legislation in force) by one of its employees, a customer, an employee of Tarmac Aerosave, he must inform the Ethics and Compliance Department by sending an email to

the following address:
ethics@tarmacaerosave.aero.

All information collected will be treated with utmost attention. Tarmac Aerosave is committed to protecting the whistleblowers against all forms of discrimination and reprisals



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