



**GLOBAL CODE OF CONDUCT
OF
MARTUR FOMPAK INTERNATIONAL**

ISSUED DATE	REVISION NO	REVISION DATE
1.01.2017	5	31.01.2023

CONTENT:

Our Culture

- *Foreword from Board of Directors*
- *Scope*
- *Vision*
- *Mission*
- *Values*

Our People

- *Diversity, Inclusion and Equal Opportunities*
- *Gender Equality*
- *Non-Discrimination and Harassment*
- *Ethical Recruiting*
- *Child Labour, Young Labour, Forced Labour, Modern Slavery & Human Trafficking*
- *Working Hours and Compensation*
- *Freedom of Association and Collective bargaining*
- *Health and Safety*

Our Planet

- *Environment*

Our Resources

- *Data Privacy, Protection and Data Security*
- *Financial Responsibility/Accurate Records*
- *Disclosure of Information*
- *Proper Use of Resources and Assets*

Culture of Lawfulness

- *Anti-Bribery, Anti-Corruption and Anti-Money Laundering*
- *Conflict of Interest*
- *Counterfeit Parts*
- *Export Controls, Trade and Economic Sanctions*
- *Responsible Sourcing*
- *Fair Competition/Anti-Trust*

Speak up

- *Speak Up & Non-Retaliation*
- *Remediation*

ISSUED DATE	REVISION NO	REVISION DATE
1.01.2017	5	31.01.2023

OUR CULTURE

Foreword from Board of Directors

Dear All,

The purpose of this Global Code of Conduct is to encourage all persons associated with any Group companies to adhere to the most stringent instructions for conduct and for ethics, as part of their commitment to comply with laws, contracts, procedures and ethical principles.

This Global Code of Conduct is binding on anyone who has ties to a Group company, regardless whether they are stakeholders, shareholders, employees, suppliers, subcontractors and/or others, in which it operates.

We are all guarantors of the moral and ethical principles underlying our activities.

THE BOARD OF DIRECTORS

ISSUED DATE	REVISION NO	REVISION DATE
1.01.2017	5	31.01.2023

Scope

We, all Martur Fompok International companies and its affiliates, conduct all our business activities in full compliance both with all applicable laws and regulations of the countries in which we operate and with world class best practices.

We believe that everyone is accountable for this Global Code of Conduct including our Business Partners such as customers, suppliers, contractors, consultants, and our employees and the Board of Directors.

We also want to work with companies and people that hold themselves to similar standards and share similar values. This means compliance with our third party policies and a commitment to working with us to address issues that negatively impact society and the planet.

Vision

Reshaping mobility with responsible solutions

Mission

As an innovative strategic partner, we supply the highest standards of services through sustainable, and accessible cockpit systems

Values

We CARE for people, quality, our company, customer, transparent communication and the environment.

We SHARE success and experience, innovation, and technology

We DARE to try, create, evolve, and develop

ISSUED DATE	REVISION NO	REVISION DATE
1.01.2017	5	31.01.2023

OUR PEOPLE

Human rights and working conditions protect the dignity of every person. We are committed to [10 principles of United Nations Global Compact](#) and undertake to fulfil all kinds of responsibilities to create a fair and sustainable working environment. In all countries we operate, we respect and promote human rights and working conditions in compliance with international standards, local laws and regulations and company values; We Care- We Share- We Dare. We expect every Business Partners to be in line with these requirements.

Diversity, Inclusion and Equal Opportunities

We make our workplace productive, creative, innovative and competitive via diversity. We pay attention to make objective decisions during selection, recruitment, development and promotion of employees on the basis of the qualifications and skills needed for the work to be performed. We promote an inclusive working environment where everyone is valued for their contribution to the company.

Gender Equality

Gender equality is one of the most important elements for the growth of companies that ensures a fair society. Our employees enjoy equal opportunities, choices, capabilities, and knowledge as equal employees. We are committed to promoting women's human rights and achieve gender equality.

Non-discrimination and Harassment

We have zero-tolerance principle towards discrimination with respect to any aspects of the employee relationship, such as recruitment and hiring, compensation and benefits, working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, and disciplinary practices.

ISSUED DATE	REVISION NO	REVISION DATE
1.01.2017	5	31.01.2023

We reject all forms of discrimination and harassment against anyone, including but not limited to race, gender, colour, religion, nationality, age, civil status, physical or mental limitations, pregnancy, social background, ethnicity, sexual orientation, gender definition, or any other personal traits or preferences and political opinion.

Ethical Recruiting

We pay utmost attention to meet ethical recruitment principles in accordance with the UN Guiding Principles on Business and Human Rights. We have in place recruitment management systems to ensure consistency with both the local legislations and our standards. We conduct every employment activity in a manner that treats the potential employees with dignity and respect to provide each recruit a good employee experience.

Child Labor, Young Labor, Forced Labor, Modern Slavery & Human Trafficking

We have zero-tolerance against child labor and the recruitment of young labor under 18 years old. We reject all forms of forced or bonded labor, modern forms of slavery and any form of human trafficking.

You can visit our well-defined policy explaining our principles in detail on Human Rights Policy.

Working Hours and Compensation

We comply with the regulations, practices and collective bargaining agreements if any, applicable in those countries where we operate, regarding working hours. For a fair and efficient working environment, employees have regular breaks, vacation and leave rights.

We are committed to the “equal pay for equal work” principle. Wages and benefits are determined based on sectoral trends, local labour market data, company financial performance and in accordance with the applicable regulations and collective bargaining agreements if any.

ISSUED DATE	REVISION NO	REVISION DATE
1.01.2017	5	31.01.2023

Freedom of Association and Collective Bargaining

We respect our employees' right and freedom of association, and collective bargaining without fear of reprisal, intimidation or harassment in order to protect and develop their economic and social rights and interests.

Health and Safety

We are committed to provide healthy and safe working areas to all our employees and other people present in our facilities for any reason. We aim to eliminate or reduce all type of occupational risks, prevent injuries, support the physical and mental wellbeing by ensuring good working conditions and improve health and safety performance continuously.

You can visit our well-defined policy explaining our principles in details on Health and Safety Policy.

OUR PLANET

Environment

We take our responsibility to reduce our carbon and ecological footprint. With our Business Partners, our principles to minimize our impacts are;

- to choose environmentally friendly and highly energy efficient technologies, sustainable and/or ecological materials/resources,
- to avoid waste and losses
- to prevent air, soil, water from pollution, and
- to protect climate and biodiversity

You can visit our well-defined policy explaining our principles in details on Environment Policy.

ISSUED DATE	REVISION NO	REVISION DATE
1.01.2017	5	31.01.2023

OUR RESOURCES

Data Privacy, Protection And Data Security

We maintain data privacy standards at utmost level, in order to protect the all forms of information and data of our employees and Business Partners. Data privacy standards are implemented in accordance with related legislations.

It is our common responsibility to ensure that knowledge and information is effectively used, correctly shared, and handled confidentially, and is integral and accessible and is in accordance with applicable legislation in all locations where we operate.

All personal data collected by us will be processed fairly, transparently, carefully and in full compliance with the applicable legal requirements as per our Privacy Policy.

We comply with all applicable requirements and guidelines on information protection and cyber security as per our well-defined policy explaining our principles on Information Security Policy, and we have strict rules and malicious activities tracking systems to keep our and our customers' data and systems secure in all our locations by having state of the art cyber security solutions.

Financial Responsibility/Accurate Records

We strictly comply with all statutory requirements for proper, accurate and complete accounting and financial reporting as well as tax laws and regulations. We further place the highest importance on creating records that reflect the true nature of the transactions and activities they document. We expect the same standards of honesty and integrity to apply across all business records, from research results to expense claims.

Disclosure of Information

We share accurate, complete information in a timely manner about our operations and governance with our stakeholders.

ISSUED DATE	REVISION NO	REVISION DATE
1.01.2017	5	31.01.2023

Proper use of resources and assets

We provide the resources, means, goods and facilities required for the performance of the tasks entrusted to each employee, which must be used only for the achievement of those purposes and never to obtain of benefit for themselves or third parties.

The use of assets and expenditure on behalf of us must comply with the principles of necessity and austerity.

CULTURE OF LAWFULNESS

Anti-Bribery, Anti-Corruption and Anti-Money Laundering

We have zero-tolerance policy for all forms of bribery, corruption, extortion, embezzlement and money laundering.

We never tolerate the giving, accepting or offering of gifts and benefits. Also, our employees never give, accept or offer gifts and earn profit for themselves by utilizing company resources and their position in the company as it is explained in detail in our Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy.

Conflicts of Interest

We take all business decisions and choices to avoid and disclose situations where our employees' and Business Partners' financial or other interests conflict with job responsibilities, or situations giving any appearance of impropriety.

Having a conflict of interest is not illegal, but it is important how we handle it. We act in transparency and raise any current, perceived or potential conflict of interest as per our Conflicts of Interest Policy to prevent and manage such cases.

Counterfeit Parts

We commit to eliminate risk of counterfeit products by ensuring traceability for all items incorporated in the product and put in place strict procurement procedures as per our Sustainable Procurement Policy.

ISSUED DATE	REVISION NO	REVISION DATE
1.01.2017	5	31.01.2023

Export Controls, Trade and Economic Sanctions

We do business globally which means our activities are subject to various national and international trade laws, restricting or prohibiting the import and export of our products or services. These restrictions can be based not only on the nature of the product, but sometimes also on the country of origin or destination, or even on the identity of the customer

Responsible Sourcing

We track our suppliers and origin of materials about the Corporate Social Responsibility principles and monitor their performance via our Supplier Portal. We do not work with any supplier which has a violation on our Code of Conduct and internationally accepted principles of Human Rights, Protection of Environment and Business Ethics.

You can visit our well-defined policy explaining our principles in details on Sustainable Procurement Policy.

Fair Competition/Anti -Trust

We are committed to conducting our business solely on the basis of free and fair competition, and we strictly obey all applicable laws and regulations. We believe that fair, well-regulated competition strengthens our market and benefits our customers.

ISSUED DATE	REVISION NO	REVISION DATE
1.01.2017	5	31.01.2023

SPEAK UP

Speak Up and Non-Retaliation

We encourage our employees and Business Partners to share and report any violations or potential violations of any our policies and standards, and any applicable laws or regulations, in confidence and/or anonymously.

Our Compliance Committee is responsible for investigating and resolving the concerns as per our Whistle Blowing Policy under the principle of confidentiality.

We have zero tolerance policy for any kind of retaliation against anyone who wants to do the right thing, by raising a concern in good faith. Any such retaliation would undermine the trust that is essential to our success, and would be treated as serious misconduct, resulting in disciplinary action.

Remediation

We take our responsibility on the adverse effect of our activities, and if there is, we correct it for all affected parties. We always look for risks and take actions to prevent the adverse impact from occurring.

ISSUED DATE	REVISION NO	REVISION DATE
1.01.2017	5	31.01.2023