

CODE OF CONDUCT

HEICO-Group



> PREAMBLE

Preamble

The HEICO Group is aware of its responsibility towards its employees, customers, business partners and society. Our actions and principles are critical to the success, integrity and sustainability of our company. This Code of Conduct affirms our commitment to uphold the highest ethical standards and principles in our daily activities. We recognise that integrity, fairness, transparency and respect are the foundation of our long-term success. This Code serves as a guide to define our shared values and commitments and to ensure that they are embedded in our corporate culture.

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> BASIC PRINCIPLES AND BEHAVIOURAL REQUIREMENTS

1.1 Integrity

Integrity is at the core of our corporate culture. We expect every employee to conduct themselves sincerely, ethically, and honestly, both within and outside the company. This means acting not only within the bounds of the law but also doing the right thing, even when no one is watching.

1.2 Fairness, transparency and trust

We promote fairness and transparency in all our business relationships. Open communication, clear agreements and honouring commitments form the basis for the trust we place in our employees, customers and partners.

1.3 Dealing with risks

The identification and appropriate management of risks are of central importance. Every employee is required to recognise and assess risks and proactively take measures to avoid or minimise risks in order to ensure the long-term well-being of the company.

1.4 Respect for human rights

We respect fundamental human rights and expect the same from our business partners. This includes the rejection of discrimination, exploitation and forced labour. Our business practices must never lead to human rights violations. This applies to all people, regardless of their gender.

1.5 Lawful and compliant behaviour

Compliance with all applicable laws and regulations is mandatory for every employee. We invest in training to ensure that all employees have a comprehensive understanding of the applicable laws and observe them in their daily actions.

1.6 Avoiding conflicts of interest

It is crucial to recognise and avoid conflicts of interest in order to ensure objective business decisions. Employees must disclose potential or actual conflicts of interest and, in such situations, refrain from making decisions based on conflicts of interest.

1.7 Careful handling of company assets

We expect every employee to handle the company's assets with care. Resources should be utilised efficiently in order to avoid waste. This includes not only physical goods, but also time and expertise.



> BASIC PRINCIPLES AND BEHAVIOURAL REQUIREMENTS

1.8 Proper accounting and financial reporting

Accounting and financial reporting must be accurate, reliable and transparent. We are committed to adhering to internationally recognized accounting standards and disclosing relevant financial information.

1.9 Appropriate public behaviour

We expect our employees to represent the company in a dignified manner, whether in business negotiations, in public or on social media. Respectful and professional behaviour is essential to maintain the company's reputation.

> BEHAVIOUR TOWARDS BUSINESS PARTNERS AND THIRD PARTIES

2.1 Fair competition

We are committed to fair competition and avoid practices that could restrict or distort competition. The company and its employees must comply with all relevant competition laws and not enter into any agreements with competitors that could impair the free market.

2.2 Anti-corruption

Extortion or corruption in any form is strictly prohibited. Employees may neither accept nor offer bribes, whether directly or indirectly. We require our employees to organise business relationships transparently and not to allow any influence by third parties.

2.3 Gifts and other benefits

Gifts and benefits may only be accepted to a limited extent and must be documented transparently. Under no circumstances may they influence the independence and integrity of our decision-making.

2.4 Donations and sponsorship

Donations and sponsoring activities are carried out in accordance with our ethical principles and in compliance with the applicable laws. They must be transparent and must not be used to gain unjustified advantages.

2.5 Prevention of money laundering and terrorist financing

We are actively committed to implementing effective measures to prevent money laundering and terrorism financing. Every employee is encouraged to report suspicious transactions and to actively participate in internal controls.

2.6 Export control and sanctions law

We strictly adhere to export control and sanctions regulations to ensure that our products and services do not fall into the wrong hands. Compliance with these regulations is essential for our international business.

2.7 Taxes and customs duties

We pay our taxes and customs duties punctually and correctly. Tax evasion and customs violations are serious offences against our corporate principles and will not be tolerated.

2.8 Technical compliance

Compliance with technical regulations and standards is crucial to the quality of our products and services. Employees must ensure that our products comply with the applicable standards and do not pose any risks to customers.

> DEALING WITH DATA AND INFORMATION

3.1 Digitalisation

We utilise digital technologies to increase our efficiency and innovative strength. Protecting digital assets and ensuring the availability and integrity of data is of the utmost importance.

3.2 Protection of company-relevant information

Confidential information about our company, our customers and partners may only be made accessible to authorised persons. Unauthorised access to or disclosure of confidential information is strictly prohibited.

3.3 Protection of personal data

We treat the personal data of customers, employees and business partners with the utmost care. The handling of such data must always be lawful and transparent, and data protection regulations must be strictly adhered to.

3.4 IT security

IT security is crucial to protect data from cyberattacks and unauthorised access. Employees are obliged to follow the IT security guidelines and to report security-related incidents immediately.

> DEALING WITH EMPLOYEES AND COLLABORATORS

4.1 Fair working conditions and employee development

We offer safe and fair working conditions that support the health and well-being of our employees. Professional development is encouraged and employees have access to training and promotion opportunities.

4.2 Diversity and the principle of equal treatment

Confidential information about our company, our customers and partners may only be made accessible to authorised persons. Unauthorised access to or disclosure of confidential information is strictly prohibited.

4.3 Rejection of slavery, forced and child labour

We condemn slavery, forced, and child labor in any form and expect our suppliers and partners to adhere to these principles as well. Our business relationships must never contribute to the support of such practices.

4.4 Dialogue with employees and employee representatives

An open and constructive dialogue between employees and employee representatives is important to us. We support employee representatives and are prepared to work together to find solutions to workplace issues.

4.5 Remuneration and benefits

Wages are based on the collective wage agreement applicable in our company. Banked hours should preferably be used for time off. Benefits are provided in accordance with legal requirements and company agreements.

4.6 Working hours

The agreed working hours must be adhered to. Overtime is only permitted with prior approval. Break regulations and legal requirements must be observed. Start and end times are documented through clocking in and out, and notification is required in case of illness.

4.7 Freedom of association and collective bargaining

Employees have the right to freely organize and join employee representative bodies. A works council is present and is respected in collective bargaining. These negotiations are conducted in accordance with applicable agreements.

4.8 Harassment and non-discrimination

Any form of harassment and discrimination is strictly prohibited in our company. All employees are treated fairly and respectfully, regardless of gender, origin, religion, or other personal characteristics.

> DEALING WITH EMPLOYEES AND COLLABORATORS

4.9 Rights of minorities and indigenous peoples

The rights of minorities and indigenous peoples are respected and promoted in our company. We strive for an inclusive work environment where diversity is valued and discrimination is excluded.

4.10 Land, forest, and water rights and forced eviction

We respect the land, forest, and water rights of communities and support the sustainable management of natural resources. Forced evictions are rejected, and we advocate for the rights of affected communities.

4.11 Use of private or public security forces

The use of private or public security forces is conducted solely in accordance with legal regulations and with respect for human rights. Security forces must not use violence or make threats against employees or communities.

> SUSTAINABILITY & ENVIRONMENT

5.1 Sustainable behaviour

Sustainable behaviour is a fundamental principle of our company. We are committed to long-term economic, social and ecological responsibility and endeavour to have a positive impact on society.

5.2 Environmental and climate protection

We strive to minimise our ecological footprint. This includes the reduction of CO2 emissions, the careful use of resources and compliance with all relevant environmental standards.

5.3 Greenhouse gas emissions, energy efficiency, and renewable energies

Our company actively seeks to reduce greenhouse gas emissions and promote energy efficiency. We aim to utilize renewable energies to minimize our ecological footprint and support sustainable practices.

5.4 Management of natural resources and waste reduction

The HEICO-Group promotes responsible management of natural resources and aims to avoid waste. We emphasize recycling, reuse, and sustainable practices to reduce our ecological footprint.

5.5 Decarbonization

We aim to reduce carbon emissions by implementing sustainable practices and transitioning to low-emission technologies. The goal is to contribute to climate protection and promote a more environmentally friendly future.

5.6 Environmental and animal welfare

We are also committed to animal welfare and the preservation of biodiversity. We make sure that land use is sustainable and that deforestation is reduced. We also promote measures to improve soil quality and strive to minimise noise emissions. Reuse and recycling are key elements of our environmentally friendly practices in order to reduce waste and conserve resources.

> HEALTH & SAFETY

6.1 Occupational health and safety

The health and safety of our employees is our top priority. We implement measures to prevent accidents and ensure a healthy working environment.

6.2 Emergency preparedness

Our company has implemented measures for emergency preparedness to ensure the safety and well-being of all employees. This includes regular training, emergency plans, and the provision of resources to respond quickly and effectively in case of an emergency.

6.3 Accident and safety management

The HEICO-Group has established an effective accident and Safety management system to respond quickly to incidents and minimize risks. This includes conducting risk assessments, training employees in emergency procedures, and providing annual training on hazards and risks through operating instructions.

6.4 Fire Safety

To ensure the safety of all employees, we have implemented comprehensive fire safety measures. These include regular training, the provision of fire extinguishers and emergency exits, as well as fire alarm system tests and evacuation drills.

6.5 Workplace ergonomics

We attach great importance to ergonomic working conditions in order to promote the well-being and health of our employees. This includes the provision of ergonomic furniture, training on correct posture and regular workplace evaluations to prevent health problems.

6.6 Handling of Chemical and/or Biological Substances

Our company has implemented strict guidelines for handling chemical and biological substances to ensure employee safety and environmental protection. This includes training on safe handling, the provision of protective equipment, and compliance with all relevant regulations and safety data sheets.

> REPORTS, NOTES & CONTACT PARTNERS

7.1 Reporting misconduct of any kind

We encourage all employees to report misconduct or offences. Reports can be made confidentially and it is ensured that whistleblowers are protected from reprisals. Reported violations will be thoroughly investigated and appropriate action will be taken.

7.2 Whistleblower system

We have established a secure whistleblower system that allows employees and third parties to report violations securely and anonymously. Reported information is treated confidentially and thoroughly investigated to ensure the integrity and legality of our business practices.

Concluding remarks

In conclusion, we would like to emphasise that this Code of Conduct should not be considered exhaustive or comprehensive. It serves as a guideline for our ethical standards and principles of behaviour. We are also committed to complying with all applicable laws and regulations relevant to our field of activity. This Code is an expression of our commitment to uphold the highest ethical standards and integrity in all our business activities. We endeavour to continuously work to embed these standards into our corporate culture and ensure that they are implemented in all our activities. Our responsibility goes beyond words and we endeavour to live it in our daily actions.

All information has been carefully checked. We accept no liability for errors or omissions. We reserve the right to make technical changes.

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