

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 reaffirms 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

1.2 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.

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. Our company is committed to complying with internationally recognised accounting standards and to 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

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 obliged to take effective measures to prevent money laundering and terrorist financing. Every employee is required to report suspicious transactions and 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 forced and child labour

We condemn forced and child labour in any form and expect our suppliers and partners to follow these principles as well. Our business relationships must never lead 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.

> SUSTAINABILITY, ENVIRONMENT, SAFETY AND HEALTH

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 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.

> REPORT, NOTES AND CONTACT PARTNER

6.1 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.

6.2 Whistleblower system

We will establish a secure whistleblowing system that allows employees and third parties to report violations securely and anonymously. Reported information will be 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.

11.2023