



ETHICAL CODE

Glenair Italia S.p.A.

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- PREMISE -

Glenair Italia S.p.A. (hereinafter also "Glenair" or the "Company") is part of an international Group that operates in the sector of the production and supply of connectors, accessories, components for electrical connections and complete interconnection systems.

In detail, the Company specializes in offering a complete "range" of fiber optic systems, special connectors, micro connectors, circular connectors, backshells, cable clamps, tools for wiring and harnesses (also according to MIL M85049 standards) and in its technical support provided on all major global markets.

The Company, in possession of the certifications ISO 9001: 2015, EN 9100: 2018, EN 9120: 2018, ISO / TS 22163: 2017, ECS / CIG 021 - 024: 2014, VG and ISO / IEC 17025: 2017 certified ISO 9001, is aimed at markets that embrace different sectors (e.g. aeronautics, naval, railways, aerospace and telecommunications), constantly investing in research and development projects in order to acquire, in ever faster times, new technologies, innovative materials and specialized human resources .

In carrying out its activities, Glenair aims to respect a set of values and behavioral rules that allow the Company to operate effectively and transparently and to prevent any incorrect behavior or the commission of offenses by those operating in the name and on behalf of the same.

To this end, the latter has considered that the adoption of a Ethical Code that clearly and transparently sets out the set of values that inspire it in the exercise of its business activities, also with reference to relations with third parties, is of central importance for the correct performance of the activities and for the achievement of their objectives, as well as for the purpose of preventing the possible commission of the offenses provided for by Legislative Decree 8 June 2001 n. 231.

This document (hereinafter the "Ethical Code"), adopted by the Company's Board of Directors, therefore sets out the principles to which Glenair complies, identifying the set of rights, duties and responsibilities that the Company expressly assumes towards those with which it interacts in carrying out its business and for which it expects the most rigorous observance by all recipients.

To this end, the Company undertakes to ensure the maximum dissemination of this Ethical Code, organizing an adequate training and awareness program regarding its contents.

CHAPTER I

- GENERAL PROVISIONS -

1. SCOPE OF APPLICATION AND RECIPIENTS

- 1.1 The set of principles, values and commitments set forth in this Ethical Code actually aim to inspire the activity of all those who, in various capacities and with different responsibilities, directly or indirectly contribute to achieving the vision and mission of Glenair.
- 1.2 The principles and values set out in the Ethical Code are therefore intended to bind all subjects who, within the Company, hold representative, administration or management functions, or who exercise, even de facto, management and control, all employees without exception, those who cooperate and collaborate with it - for whatever reason - in the pursuit of its objectives, and - more generally - service providers, business partners and anyone who has business relationships with it (hereinafter the " Recipients ").
- 1.3 All Recipients are required to observe and, to the extent of their competence, to enforce the principles contained in the Ethical Code: under no circumstances, the claim to act in the interest of the Company justifies the adoption of behaviors in contrast with those here set out and, in general, with laws, regulations and disciplines.
- 1.4 In view of this, Glenair undertakes to disseminate this Ethical Codes to all interested parties, to correctly interpret its contents and to make available tools that favor its application, trusting that the Recipients will behave in accordance with the values and the principles contained therein, also making it known to customers, suppliers and any other third parties who establish relationships or business relationships with the Company.
- 1.5 Glenair also implements the necessary measures in order to carry out verification and monitoring of the application of the Ethical Code itself, providing for sanctions in the event of its violation.

CHAPTER II

- PRINCIPLES -

2. PRINCIPLES

2.1 The Company accepts and shares the ethical principles (from now on, the "Principles") set out below:

- legality;
- prevention of corruption;
- prevention of conflict of interest;
- professionalism and reliability;
- transparency and correctness in the management of corporate information;
- confidentiality;
- value of the person and human resources;
- correctness in the contractual context;
- protection of workplace safety and the environment;
- prevention of money laundering;
- protection of competition;
- protection of industrial and intellectual property.

2.2 The Recipients conform their conduct to the Principles. In no case can the belief of acting in the interest or for the benefit of Glenair justify conduct contrary to them.

3. LEGALITY

3.1 All the behavior of the Recipients in the context of work activities carried out on behalf of or in the interest of the Company are based on the most rigorous compliance with the national, EU and international laws in force and applicable to the Company or in the management of the relationship with it.

3.2 Each employee of the Company must undertake to comply with the laws and regulations in force. This commitment must also apply to consultants, collaborators, suppliers, customers and anyone who has relations with the Company. For Glenair, in fact, compliance with the law is a fundamental tool for achieving its objectives, and therefore the Company will not initiate or continue any relationship with anyone who does not intend to align with this principle.

3.3 Responsibility for the compliance of the company with legal regulations must be clearly assigned, within the Company, to competent and identified persons.

3.4 The Recipient of this Ethical Code who becomes aware of any violation of legal regulations, which could lead to any risk of involvement of Glenair, or in the event of any doubt or need for further clarification in relation to the complete observance and interpretation of the provisions of this Ethical Code, must immediately notify the Supervisory Body.

4. PREVENTION OF CORRUPTION

4.1 Relations with customers, consultants and suppliers, as well as with all kinds of interlocutors of the Company, are based on criteria and behavior of correctness, collaboration, loyalty, honesty and mutual respect.

- 4.2 In particular, the Recipients who represent the Company, or act in its interest, or have business relationships with it, must refrain from any form of corruption with reference to both public and private entities.
- 4.3 Glenair does not allow any form of payment or granting of benefits to customers, commercial counterparties and third parties in general, which is not strictly deriving from a contractual obligation or a business relationship regulated by a contract.
- 4.4 The Company also expects its customers, suppliers and other partners to share this principle and act in accordance with it.
- 4.5 Company employees can accept or offer gifts as long as they are directly related to the activity carried out, legitimate, of modest value, offered in a transparent and explicit way, occasional or delivered on the usual occasions for exchanging gifts, which do not create any obligation or feeling of obligation on either side.

5. PREVENTION OF CONFLICT OF INTEREST

- 5.1 In carrying out corporate activities and making the related decisions, the Recipients operate with impartiality in the exclusive interest of Glenair, taking decisions with responsibility, transparency and according to objective evaluation criteria, avoiding situations where they are, or may even appear, in conflict of interest.
- 5.2 Conflict of interest means the case in which the Recipient pursues a personal interest or that of third parties other than that of the company or carries out activities that may, in any case, interfere with his ability to make decisions in the exclusive interest of the Company or, finally, the case in which he personally takes advantage of the same business opportunity
- 5.3 By way of example but not limited to, the following situations may cause a conflict of interest:
 - have economic and financial interests, including through family members, with suppliers or competitors;
 - exploit one's position for the realization of personal interests that are in contrast with those of the Company;
 - conclude, finalize or initiate its own negotiations and / or contracts - in the name and / or on behalf of the Company - which have family members or shareholders as their counterpart, or legal persons of which the Recipient is the owner or in which the Recipient is in any case interested;
 - carry out work activities of any kind for customers, suppliers, competitors and / or third parties in contrast with the interests of the Company and / or the agreements in force with it, except in cases permitted by law and / or authorized by the Company;
 - take personal advantage of information and business opportunities that have come to their knowledge in the course of carrying out their duties.
- 5.4 In the event of a conflict of interest, even if only potential, the Recipients inform their superiors or contact persons and the Supervisory Body without delay of the situations or activities in which there could be an interest in conflict with that of the Company, on the part of the people. themselves or their close relatives, and in any other case in which relevant reasons of convenience occur.
- 5.5 In any case, the Recipients, in the event of a conflict of interest, must refrain from contributing, directly or indirectly, to any decision or resolution relating to the matter to which the conflict relates, excluding any possibility of overlapping or in any case crossing, exploiting their own functional position , economic activities responding to a logic of personal and / or family interest and the duties they hold within the Company

6. PROFESSIONALISM AND RELIABILITY

- 6.1 Glenair conducts its business in accordance with the highest standards of ethical-professional behavior. All activities carried out for the Company must be carried out with the utmost professional commitment, moral rigor and managerial correctness, also in order to protect the image of the company.
- 6.2 The Recipients are required to carry out the activities of their competence respecting the fundamental principles of diligence, professionalism and reliability and to perform their duties with a commitment adequate to the responsibilities entrusted to them, protecting Glenair's reputation.
- 6.3 Glenair requires the Recipients to act loyally and in good faith in a spirit of mutual respect and collaboration, as well as to fulfill their contractual obligations and the required services.

7. TRANSPARENCY AND CORRECTNESS IN THE MANAGEMENT OF COMPANY INFORMATION

- 7.1 The Company ensures maximum transparency of the management processes of the activities, including the completeness of the accounting information, drawn up in a clear, complete, exhaustive manner and made available for any checks. The supporting documentation must specify the criteria adopted in the assessments of the economic elements.
- 7.2 In compliance with the principle of transparency, each operation and transaction must be correctly recorded, authorized, verifiable, legitimate, consistent and congruous, as well as the information that flows into the accounting, both general and analytical, must comply with the principles of clarity, transparency, correctness, completeness and accuracy.
- 7.3 For each operation there must be adequate documentary support in order to be able, at any time, to carry out checks that certify the characteristics and reasons for the operation and identify who authorized, carried out, registered and verified the operation itself. All data concerning management must be correctly and promptly recorded in the accounts.
- 7.4 In order for the accounting documents to meet the requirements of truthfulness, completeness, precision and transparency of the recorded data, adequate and complete supporting documentation is kept in the Company's records for each accounting operation, in order to allow:
 - an accurate and faithful accounting registration;
 - an immediate identification of the characteristics and reasons underlying the transaction itself;
 - an easy reconstruction of the operational and decision-making process, as well as the identification of the levels of responsibility.
- 7.5 Each accounting entry must accurately reflect the results of the related supporting documentation. It is therefore necessary that the supporting documentation is carefully kept in order to be easily available.
- 7.6 In the management and execution of social activities, it is required to make transparent, truthful, complete and accurate information, even externally, refraining from disseminating false information or carrying out simulated operations.
- 7.7 Each Recipient is required to promptly report to their superior or the Supervisory Body any omission, inaccuracy or falsification of accounting records or supporting documents of which they have become aware.

8. CONFIDENTIALITY

- 8.1 The Company ensures the confidentiality and protects the confidentiality of the information that constitutes corporate assets, even when referring to third parties, in the most rigorous observance of the legislation in force also regarding the protection of personal data.
- 8.2 The obligation of confidentiality therefore extends, in addition to corporate data that are not already public and to the management methods of business processes, also to information relating to customers, experts, suppliers and business partners.
- 8.3 Without prejudice to the relevant regulations, the recipients must guarantee the confidentiality of the information to which they have had access or which they have treated in the performance of their work activities, even if such information is not specifically classified as confidential.
- 8.4 No Recipient can benefit of any kind, direct or indirect, from the use of confidential information or Personal Data acquired during the activities carried out for the Company, nor communicate said information to others or recommend or induce others to use them.
- 8.5 The communication of confidential information to third parties takes place exclusively by authorized parties. In the communication of information to third parties, permitted for professional reasons, the confidential nature of the information must be expressly declared and compliance with the obligation of confidentiality must be requested from the third party.
- 8.6 The obligation of confidentiality on information is also imposed on subjects with whom the Company has contractual or other relationships. Likewise, the Company undertakes to protect information relating to its employees and third parties, avoiding any improper use of the same.
- 8.7 In the case of access to electronic information protected by passwords or data encryption systems, the latter can only be known by the assignees, who are obliged to keep them carefully and not to disclose them.

9. VALUE OF THE PERSON AND HUMAN RESOURCES

- 9.1 The Company believes that human resources represent its main capital, and therefore adopts procedures and methods of selection, recruitment, training and management based on respect for human values, rights and responsibilities of workers, promoting their development and professional growth.
- 9.2 It is in Glenair's interest and objective to guarantee a healthy and safe work environment, such as to facilitate the performance of the tasks assigned and to enhance the professional skills of each one, also ensuring the involvement and empowerment of people, with regard to the specific objectives to be reached and how to pursue them.
- 9.3 Human resources represent for Glenair an indispensable and precious value for the development and growth in the sector in which it operates. The Company therefore protects the value of the human person and - in this perspective - does not tolerate discriminatory conduct, harassment and personal offenses.
- 9.4 To this end, the Company promotes an organization of work that is based on respect, even when selecting personnel, for the personality and dignity of each individual and which prevents, at all times, the creation of situations of discomfort, hostility or intimidating.
- 9.5 The Company also promotes the protection of individual freedom and personality as indispensable. It rejects any activity that could involve any possible exploitation or reduction of the person in a state of subjection.
- 9.6 Glenair undertakes to ensure that no harassment or discriminatory behavior based on age, sex, sexual orientation, race, color, language, nationality, political and trade union opinions occurs in the workplace and in the exercise of all company activities, religious beliefs, marital and family status, disabilities, genetic information or other personal characteristics not relevant to work.

9.7 In the selection and management of personnel, the Company adopts criteria of equal opportunity, merit and enhancement of the abilities, skills and potential of individuals, committing to ensure that authority is exercised with equity and correctness, avoiding any form of abuse.

9.8 The Company also guarantees the correct fulfillment of all regulatory obligations aimed at guaranteeing, by the employer, the correct remuneration and contribution treatment of personnel, as well as a lawful stay in the State, of employees from countries outside the European Union.

10. FAIRNESS IN THE CONTRACTUAL FIELD

10.1 Contracts must be drawn up taking care to comply with the regulations in force and, as well as work assignments in general, must be carried out according to what is consciously established by the parties: the Company undertakes to ensure timely and exhaustive information on all matters regarding their business and not to exploit advantageous situations due to inadequate information or knowledge of their counterparties, also in full compliance with the provisions of the law on the processing of Personal Data.

11. PROTECTION OF SAFETY AT WORK AND THE ENVIRONMENT

11.1 Glenair promotes the health and safety at work of its employees and of all those who access its offices and workplaces, taking all necessary and appropriate measures, on the basis of the best technical-scientific knowledge, in view of the guarantee of absolute compliance of the workplace with the highest standards of safety and hygiene.

11.2 The Company also undertakes to guarantee working conditions that respect individual dignity and safe and healthy work environments, also through the dissemination of a culture of safety and awareness of risks, promoting responsible behavior by all, also through training activities, in compliance with company procedures and current accident prevention regulations.

11.3 The objective is to ensure compliance with the measures necessary to protect health and safety in the workplace starting from the design phase of the processes and production activities, implementing actions aimed at improving performance in terms of health and safety on the work, identifying areas for improvement and controlling and reducing the use of hazardous substances.

11.4 With this in mind, each Recipient is called to share this value and contribute, within their own context, to maintaining the safety of the work environment in which they operate and to behave responsibly to protect their own health and safety and others.

11.5 In managing its business activities, Glenair also takes the utmost account of environmental protection, pursuing the improvement of the environmental conditions of the community in which it operates, in full compliance with current legislation.

11.6 Environmental protection is recognized as a primary value to be safeguarded and therefore the Company aims to plan its activities by seeking a balance between the economic initiative and the essential needs of environmental protection, enhancing the improvement of its performance in terms of energy saving and sustainable development, ensuring the correct application of the technologies used in order to contain the related environmental impacts.

11.7 In particular, the Company promotes actions aimed at controlling emissions into the atmosphere, differentiating the collection, recycling and correct disposal of waste, paying particular attention to the choice of service providers concerning waste management.

11.8 The Company, aware of the impact of its activities on economic and social development and on the quality of life of the reference territory, intends to conduct its activities and make its investments in a socially responsible manner from an environmental point of view, ensuring complete and exhaustive communications with the community, in full compliance with the TU Legislative Decree no. 152/06 and current legislation.

11.9 Environmental protection is considered a primary objective and is therefore pursued starting from the individual behavior of the people who work for the Company, who are provided with the information and instructions necessary for the purposes of "energy saving", "waste management", and of recyclable materials.

12. PREVENTION OF MONEY LAUNDERING

- 12.1 The Company's commitments regarding correctness, transparency and honesty mean that maximum transparency is required in commercial transactions and in relations with third parties, in full compliance with national and international regulations on the fight against money laundering.
- 12.2 All financial transactions, including those occurring within the Group, are adequately justified in the contractual relationships and are carried out by means of payment that guarantee their traceability.
- 12.3 The Company rejects any conduct aimed at employing, replacing, transferring, or in any case concealing sums of money whose illicit origin, internal or external to Glenair, is known or suspected. Consequently, the Recipients cannot initiate business relationships on behalf of the Company with partners, customers, suppliers or third parties who do not give guarantees of integrity, do not enjoy a good reputation or whose name is associated with events related to money laundering.

13. PROTECTION OF COMPETITION

- 13.1 The Company believes in healthy and fair competition as well as in a competitive market and acts in compliance with antitrust legislation in order to guarantee free, distortion-free and effective competition for the benefit of competitors, customers and the Company itself. Therefore, deceptive behaviors, agreements or understandings between competitors, current or potential, which could integrate forms of unfair competition or violations of current antitrust legislation are prohibited.
- 13.2 In particular, the Company undertakes not to use improper means, such as industrial espionage, to hire personnel from competitors to obtain confidential information or to encourage competing personnel to disclose confidential information about their company.
- 13.3 In this perspective and by way of example, the recipients are prohibited from discussing prices or other commercial conditions, divisions of markets, customers or territories, business opportunities or incoming orders, capacity, production volumes or quotas, corporate strategies with competitors and sales, tenders.

14. PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY

- 14.1 The Company ensures, in implementation of the principle of legality, compliance with the internal, community and international rules set up to protect industrial and intellectual property.
- 14.2 Glenair therefore guarantees compliance with the legislation on the protection of trademarks, patents and other distinctive signs and on the subject of copyrights, preventing in this perspective the prohibition of carrying out conducts aimed, in general, at duplication or reproduction, in any form and without right, of the work of others.

CHAPTER III

- RELATIONS WITH THE STAFF

15. INTRODUCTION

- 15.1 The Company recognizes the value of human resources, respect for their autonomy and the importance of their participation in business activities.
- 15.2 The management of the employment relationship is aimed at promoting the professional growth and skills of each employee also in relation to the application of incentive tools.
- 15.3 The Company bases its personnel policy towards the development of the professionalism and individual work skills of its employees, such as values and decisive requirements to achieve the ideal achievement of corporate objectives.
- 15.4 The Company adopts the principle of corporate delegation, carried out through general and / or special power of attorney, as well as delegation of duties, to ensure the devolution of powers and functions to its individual human resources, in order to guarantee presence in the various company procedures of legally responsible subjects, exercising the duty / power of supervision over them.

16. STAFF SELECTION

- 16.1 Without prejudice to the obligations arising from the provisions of the law on the subject, the selection of personnel is subject to verification of the full compliance of the candidates with substantial adherence to the professional profiles required by the company, in compliance with equal opportunities for the interested parties.
- 16.2 The Company, within the limits of the information available, adopts appropriate measures to avoid favoritism, nepotism or forms of patronage in the selection and recruitment phases.
- 16.3 The Company, in relation to the evaluation of personnel, undertakes to ensure that in its corporate organization, if both general and individual annual or interim objectives are established, they are focused on a possible, specific, concrete result, measurable and related to the expected time for their achievement.
- 16.4 Any racial discrimination, sex, nationality, religion, language, trade union or politics, in hiring, salary, promotions or dismissal as well as any form of favoritism is prohibited.

17. STAFF RECRUITMENT

- 17.1 The recruitment of staff takes place on the basis of regular employment contracts, as no form of employment relationship that is not compliant or otherwise elusive with the provisions of the law in force is allowed.
- 17.2 At the start of the employment relationship, each employee receives information relating to:
 - characteristics of the function and duties to be performed;
 - regulatory and remuneration elements, as regulated by the national collective labor agreement;
 - rules and procedures to be adopted in order to avoid possible health risks associated with the work activity.
- 17.3 This information is presented to the person in such a way that acceptance of the assignment is based on an effective understanding of their content.

18. STAFF TRAINING

- 18.1 The Company attributes to this aspect a primary and qualifying value for its business, and dedicates resources, adequate tools and time to the achievement of behavioral objectives with particular attention to health and safety in the workplace, the safety of the processing of Personal Data, the protection of Environment and the inspiring principles of this Ethical Code.
- 18.2 The Company makes information and training tools available to people with the use of the most appropriate techniques including distance learning, with the aim of enhancing specific skills and preserving the professional value of staff.
- 18.3 Training is assigned to groups or individuals, based on specific professional development needs. The institutional training plan ensures that each person receives adequate training both at the time of hiring and in any further professional transition, job change, etc.

19. INVOLVEMENT AND PARTICIPATION OF PEOPLE

- 19.1 The involvement of the personnel in carrying out the work is ensured, also by providing for moments of participation in discussions and exchange of information functional to the achievement of corporate objectives.
- 19.2 People must participate in such moments with a spirit of collaboration and independent judgment.
- 19.3 Listening to the various points of view, compatibly with company needs, allows managers to formulate final decisions; the staff must, however, always contribute to the implementation of the established activities.

20. HEALTH AND SAFETY

- 20.1 The Company undertakes to offer a work environment capable of protecting the health and safety of its personnel, considering this obligation a productive investment and a factor of growth and added value for the Company itself.
- 20.2 Glenair undertakes to protect the moral and physical integrity of its employees, consultants, collaborators and all of its interlocutors.
- 20.3 To this end, it promotes responsible and safe behaviors, adopts all the safety measures required by technological evolution to ensure a safe and healthy working environment, in full compliance with the current legislation on prevention and protection, also, in particular, in order to prevent the crimes referred to in Articles 589 and 590 of the Criminal Code (manslaughter and serious or very serious personal injury), committed in violation of accident prevention regulations and the protection of hygiene and health at work.
- 20.4 The Company provides for the fulfillment of all related legal obligations (Legislative Decree 81/2008 art. 30, Consolidated Law on Safety):
 - a) compliance with the technical-structural standards of the law, relating to equipment, plants, workplaces, chemical, physical and biological agents;
 - b) risk assessment activities and preparation of consequent prevention and protection measures;
 - c) organizational activities, such as emergencies, first aid, procurement management, periodic safety meetings, consultations with workers' representatives for safety;
 - d) health surveillance activities;
 - e) the information and training of workers;
 - f) supervisory activities with reference to workers' compliance with the procedures and instructions for working safely;
 - g) the acquisition of mandatory legal documentation and certifications;

h) periodic checks on the application of the effectiveness of the procedures adopted.

20.5 The Company guarantees the preparation of functions that ensure the technical skills and powers necessary for the verification, assessment, management and control of risk.

20.6 With regard to health and safety in the workplace, decisions, both at an operational and top level, are taken and implemented by the Company on the basis of the following fundamental principles and criteria (pursuant to art.6 co. 1 and 2 of the European Directive n.89 / 391):

- avoid risks;
- assess the risks that cannot be avoided;
- combat risks at source;
- adapt work to the man, in particular with regard to the design of workplaces and the choice of work equipment and methods of work and production, in particular to reduce monotonous and repetitive work and to reduce effects of these works on health;
- take into account the degree of technical evolution;
- replace what is dangerous with what is not dangerous or less dangerous;
- planning prevention, aiming at a coherent complex that integrates the technique, work organization, working conditions, social relations and the influence of factors in the work environment into the same;
- give priority to collective protection measures over individual protection measures;
- give adequate instructions to workers.

20.7 The Company undertakes to spread and consolidate a culture of safety in terms of prevention, developing awareness of risks and promoting responsible behavior by all people, who are ensured adequate information and training to guarantee full and timely compliance with the rules and internal procedures, which are asked to promptly report any shortcomings or non-compliance with applicable regulations.

20.8 The Company's objective is to protect human resources, constantly seeking the necessary synergies not only internally, but also with suppliers, companies and customers involved in the Company's activities, also with a view to constantly improving management and achieving the goals set.

20.9 To this end, a capillary internal structure, attentive to the evolution of the reference scenarios and the consequent change in the production cycle and organizational structure, carries out interventions through:

- the introduction of an integrated risk and safety management system;
- a continuous analysis of the risk and criticality of the processes and resources to be protected;
- reporting of accidents and near misses;
- the adoption of the best technologies;
- the control and updating of working methods;
- carrying out training and communication interventions.

In particular, in application of the occupational health and safety regulations, the Company takes the following directions:

- i) the Company intends to make effective and apply to its organizational and functional structure, the rules for the protection of health and safety at work with the aim of systematically reducing the risks for personnel in the area of accidents and occupational diseases. This objective is considered strategic for the Organization, which intends to pursue it with a view to the continuous improvement of its operational management in synergy with the primary purpose of optimizing the activity, reducing waste and inefficiencies, improving profitability;
- ii) the Company uses its Risk Assessment Document as a reference tool for its preventive activity, developing the Safety Procedures, operating instructions, training programs and personnel

training on the basis of what is established in the Document itself, whose timely updating and maintenance is ensured with the assistance and support of qualified and adequate resources in terms of competence, experience and ability;

- iii) the Risk Prevention and Protection Service is managed according to the objectives set, ensuring adequate economic, financial and personnel resources that are maintained over time, with recourse to external resources in all cases in which there aren't adequate skills in the organization.

21. PROTECTION OF PRIVACY

- 21.1 In processing the personal data of its personnel, the Company complies with the provisions contained in Regulation (EU) no. 679/2016 "relating to the protection of individuals with regard to the processing of personal data, as well as the free circulation of such data and which repeals Directive 95/46 / EC (general regulation on data protection)" - (also called "Regulation "Or" GDPR ").
- 21.2 The legislation is applied by the Company as a primary guarantee instrument, therefore it is integrated into its management system. Personnel receive adequate training in compliance with the procedures and operating instructions received, and are required to fully comply with and promptly apply them.
- 21.3 Individuals are given a privacy policy which identifies: the data controller, the type of data processed, the purposes and methods of processing, the legal basis of the processing, any subjects to whom the data are communicated, the nature of the collection of the data, the retention period as well as the information necessary to exercise the rights referred to in Articles 15-21 of the Regulation.
- 21.4 In cases where the law requires it, people are asked to consent to the processing of their personal data.

22. DUTIES OF THE STAFF

- 22.1 Personnel must act loyally in order to comply with the obligations underwritten in the employment contract and the provisions of this Ethical Code, ensuring the required services and must comply, in carrying out their duties, in compliance with the law and base their conduct on ethical principles of integrity, fairness, fidelity and good faith.
- 22.2 Staff are also required to respect:

• Confidentiality of company information:

Company information and know-how must be protected with the utmost confidentiality. The most significant data that the Company will acquire or create, in the course of its business, will be considered confidential information and subject to adequate attention: this also includes information acquired from and regarding third parties (customers, professional contacts, professional partners, employees, etc.).

People ensure that the data processed by the Company, including Personal Data, are "safe", which means legitimately acquired and processed in compliance with the information issued to the interested parties and any consent.

• Use of company assets:

Each Recipient is required to work diligently to protect company assets, through responsible behavior and in line with the operating procedures set up to regulate their use, accurately documenting their use. In particular, each Recipient must:

- use the assets entrusted to him scrupulously and sparingly;

- guard and preserve the assets of the Company that are entrusted to him in the context of his business and use them appropriately and in accordance with the social interest, adopting behaviors that reasonably prevent their improper use by third parties;
- avoid improper use of company assets, which may cause damage or reduction in efficiency, or in any case contrary to the interest of the Company;
- adequately guard the resources entrusted to him and promptly inform the units in charge of any threats or events harmful to the Company.

With regard to IT applications, each person is required to:

- scrupulously adopt the provisions of the corporate security policies, in order not to compromise the functionality and protection of the IT systems;
- refrain from sending threatening or insulting e-mail messages, or from using low-level language, or from making inappropriate comments that may offend people and / or damage the corporate image;
- refrain from browsing Internet sites with indecent and offensive content, and in any case not related to professional activities.

The Company reserves the right to prevent the distorted use of its assets and infrastructures, through the use of accounting, reporting, financial control and risk analysis and prevention systems, without prejudice to compliance with the provisions of current laws (law on privacy, workers' statute, etc.) and ensuring prior information to the personnel concerned.

Each Recipient is required:

- not to use, for private interests or purposes, the goods or IT equipment available for office reasons. Each employee is responsible for the security of the IT systems used and is subject to the regulatory provisions in force and the conditions of the license agreements;
- except as provided by civil and criminal laws, the use of network connections for purposes other than those inherent to the employment relationship is part of the improper use of company assets and resources;
- to make the necessary efforts in order to prevent the possible commission of crimes through the use of IT tools.

● ***Gifts, presents and other benefits:***

It is not permitted to offer or receive, directly or indirectly, money, gifts or benefits of any kind in a personal capacity, to or from third parties (Public Administration, associations, other organizations of similar nature, customers, suppliers, etc.) for the purpose of obtaining undue advantage for themselves and for the Company, influencing the recipient's independent judgment. Acts of commercial courtesy, such as gifts or forms of hospitality, are permitted to the extent that they comply with defined company procedures.

● ***Information obligations:***

All employees are required to promptly and confidentially report to their department manager and / or to the Supervisory Body any information they become aware of in the performance of their work activities, regarding violations of legal regulations, the Ethical Code or other corporate provisions that may, in any capacity, involve the Company. Function managers must supervise the work of their employees and must constantly and promptly inform the Supervisory Body.

● ***Abstention obligations:***

Glenair employees and collaborators, in private relationships, must avoid any abuse of their position with the aim of obtaining undue advantages for themselves or for others. All the people of the Company are required to refrain from personally taking advantage of business opportunities, of which they become aware in the course of carrying out their duties. Each employee must refrain from behaving and making decisions that may directly or indirectly favor their interests.

It is also mandatory to refrain from publicly presenting the image of Glenair in a form that is detrimental and such as to generate distrust of it.

Situations that may generate a conflict of interest identifiable by way of example and not limited to in the following situations are expressly prohibited:

- exercise on their own an activity in competition with those of the Company, including through family members;
- have economic interests with suppliers, customers or competitors;
- accepting money or favors from people or companies who have or intend to enter into business relationships with the Company;
- accept or receive any gifts, gratuities or other gifts that have a monetary value rather than a symbolic one, from suppliers, customers or other entities with which they have an ongoing professional relationship.

In the event that even the appearance of a conflict of interest arises, the person is required to communicate it and is also required to provide information about the activities carried out outside the workplace, in the event that these they may appear in conflict of interest with the Company.

CHAPTER IV

- RELATIONS WITH THE PUBLIC ADMINISTRATION -

23. INTRODUCTION

- 23.1 Relations and relations with Public Administrations, central and peripheral, national and / or foreign, with public officials, with public service officers, Italian or foreign, with Independent Administrative Authorities, with investee companies, with municipal companies and, in any case, any relationship of a public nature, are inspired by the most rigorous observance of the applicable regulatory provisions and the principles of transparency, honesty and fairness.
- 23.2 Attention and care must be paid, by way of example, in operations relating to tenders, contracts, authorizations, licenses, concessions, requests and / or management and use of loans, however denominated, of public origin (national and European) and in general in relations with supervisory authorities or other independent authorities, representatives of public administrations, social security institutions, bodies responsible for the collection of taxes, etc.
- 23.3 In particular, Recipients must, as far as they are concerned:
- ensure that relations with public officials are managed exclusively by persons with suitable powers and that such relations take place in compliance with the laws, regulations in force, principles of loyalty and correctness;
 - carry out the obligations towards the Public Administration, with the utmost diligence and professionalism in order to provide clear, accurate, complete and truthful information, avoiding and reporting situations of conflict of interest;
 - ensure that the documentation to be sent to the Public Administration is produced by the persons competent in the matter and previously identified and that it is always previously shared with their manager;
 - guarantee the confidentiality in the transmission of information;
 - use communication channels with the Public Administration that allow the subsequent traceability / formalization of the information sent and / or received;
 - guarantee the legality, correctness, transparency of all relationships with public officials, public service officers and representatives of Public Administrations in general, taking care to keep the documentation exchanged and that supporting the data and information provided and decisions hired;
 - ensure that the procedures relating to the request, issue and maintenance of licenses, authorizations or concessions, as well as relations in general with the authorities that carry out judicial, inspection and regulatory functions are managed exclusively by the competent functions and are based on the principles of legality, transparency, collaboration and fairness.
- 23.4 In these reports, the Recipients must not improperly influence the decisions of the officials who negotiate or decide on behalf of the Public Administration, refraining from any behavior capable of compromising the impartiality and independence of judgment of the Public Administration.
- 23.5 It is therefore forbidden for Recipients:
- offer, give, pay, accept any request for money or other benefits to / from public officials or authorize anyone to give or pay, directly or indirectly, any sum of money, other benefits, advantages or anything of value to / or for a public official in order to promote or favor the interests of the Company improperly or in any case in violation of applicable laws;
 - make services or payments in favor of collaborators, suppliers, consultants, partners or other third parties who work, on behalf of Glenair, with the Public Administration or the Independent Administrative Authorities, which are not adequately justified in the context of the contractual relationship established with themselves or in relation to the type of assignment to be carried out and the local practices in force;

- resort to other forms of aid or contributions (gifts, assignments, consultancy, assistance, etc.) that have the same purposes prohibited in the previous point;
- exercise undue pressure and influence on public officials, persons in charge of public service and their families in order to obtain particular advantages for the Company in carrying out activities related to their office;
- engaging in deceptive conduct that could lead the Public Administration into a technical - economic evaluation error of the documentation presented;
- present untruthful declarations and / or authorizations by exhibiting documents that do not fully correspond to reality;
- misrepresent or persuade others to do so;
- engaging in misleading conduct towards public officials such as to induce the latter into evaluation errors during the analysis of requests for authorizations and the like.

23.6 It is expressly forbidden to use documents containing untrue data or to omit relevant information in relations with the Public Administration in one's favor or obtain, in the interest of the Company, national or EU contributions or financing. It is not allowed to use any public contributions received for purposes other than those for which they were assigned.

24. MANAGEMENT OF COMMUNICATION WITH THE P.A.

- 24.1 In managing communication with the Public Administration, the Company undertakes to operate with correctness and impartiality through the corporate communication channels in charge of this, representing the interests and positions of the Company in a truthful, transparent and consistent manner, avoiding any exposure of information or any untrue, incomplete or misleading statements, in order to obtain an undue advantage for Glenair.
- 24.2 In the event that the documentation to be sent to the Public Administration is produced, in whole or in part, with the support of third parties (consultants, experts, technicians, etc.), the Company's commitment is to ensure that their selection always takes place in compliance with the requirements of professionalism, independence, competence.

25. MANAGEMENT OF CONTROL ACTIVITIES

- 25.1 The Company intends to facilitate the correct performance of the controls carried out by the bodies appointed to them by law.
- 25.2 Therefore, any inspection visits by the supervisory authorities and relations with the judicial authority must be managed by authorized personnel with a spirit of collaboration, fairness and transparency, with absolute prohibition against hindering the regular performance of the verification activity by concealing or destruction of documentation.

CHAPTER V

- RELATIONS WITH THIRD PARTIES -

26. RELATIONS WITH CUSTOMERS, SUPPLIERS AND BUSINESS PARTNERS

- 26.1 Glenair aims at the maximum satisfaction of its customers by guaranteeing availability and prompt response to their needs, as well as quality in the products offered.
- 26.2 The choice of suppliers and collaborators and the determination of the related purchase conditions are left to the competent corporate functions that act on the basis of objective and impartial criteria, based primarily on the assessment of reliability, quality, technical preparation, efficiency and cost-effectiveness.
- 26.3 In the supplier selection process, the following criteria are applied in particular:
- objective assessment of the quality and capacity of the supplier and guaranteeing goods, services and performances of an adequate level;
 - verification of the appropriately documented availability of means, including financial, organized structure, technical knowledge, skills and resources in relation to the intervention to be performed;
 - verification of the professionalism of the interlocutor.
- 26.4 Recipients are also required not to preclude anyone, in possession of the required requisites, from competing for the stipulation of contracts, adopting objective and documentable criteria in the choice of candidates.
- 26.5 In any case, the Company requires that suppliers and collaborators operate in compliance with all applicable laws, including, by way of example, the employment laws relating to the work of minors, minimum wages, overtime pay, hiring and safety at work.
- 26.6 The choice of commercial partners also falls on operators who meet criteria of ethics, reliability, good reputation, credibility in the reference market and professional reliability.
- 26.7 The Company also refrains from having relations of any kind with persons who are known or have reason to suspect are carrying out support activities in any form to criminal organizations of any nature.

27. RELATIONS WITH EXTERNAL COLLABORATORS / CONSULTANTS

- 27.1 The Company may immediately terminate any employment relationship established with external collaborators / consultants who do not agree to abide by this Ethical Code.
- 27.2 The Recipient who identifies the behavior of an external collaborator / consultant who does not adhere to this Code is required to promptly notify the Supervisory Body

28. RELATIONS WITH INSTITUTIONS AND OTHER ORGANIZATIONS

- 28.1 Relations with institutions are based on the utmost rigor, transparency and correctness in compliance with institutional roles. Analogous behavioral rules characterize the political and trade union relations that Glenair maintains.
- 28.2 The Company supports initiatives promoted by organizations with a proven reputation and for worthy purposes (eg social, moral, scientific, cultural, charitable or solidarity) that can contribute to the growth and development of the Company.
- 28.3 On the other hand, direct or indirect contributions to parties, trade unions, cultural or charitable bodies, political exponents / candidates or to events with political purposes, made with a view to obtaining material, commercial or personal advantages, are not allowed.
- 28.4 Glenair rejects any relationship with national or foreign organizations, associations or movements that pursue, directly or indirectly, purposes prohibited by law, contrary to ethics or public order or which violate the fundamental rights of the person.

CHAPTER VI

- SANCTIONING AND FINAL PROVISIONS -

29. THE ROLE OF THE SUPERVISORY BODY

- 29.1 With the approval of the Organization, Management and Control Model pursuant to Legislative Decree 231/01 of which the Ethical Code is an integral and essential part, the Supervisory Body (SB) of Glenair was established, the body to which entrusted with the task of supervising the functioning of the Model and of updating it.
- 29.2 Control over compliance with the Ethical Code is left to the Supervisory Body established pursuant to Legislative Decree 231/2001. Consequently, the staff can address any doubts to said Body regarding its interpretation and report - even anonymously through dedicated channels - alleged violations of which they have become aware in the context of their work.

In general, the following tasks are the responsibility of the Supervisory Body:

- communicate to the Human Resources Manager, for the taking of appropriate measures, the reports received regarding violations of the Ethical Code;
 - monitor compliance with the Ethical Code, having access to all the Company's sources of information for this purpose and suggesting appropriate updates, also on the basis of reports received from staff;
 - express binding opinions on the revision of the most relevant policies and procedures, in order to ensure consistency with the Ethical Code;
 - contribute to the periodic review of the Ethical Code: to this end, the SB formulates the appropriate proposals to the Board of Directors, which evaluates them and, if necessary, approves and formalizes them.
- 29.3 The corporate bodies and their members, employees, collaborators and third parties acting on behalf of the Company, are required to collaborate fully in favoring the performance of the functions of the Supervisory Body.
- 29.4 In the event of a report, the Supervisory Body guarantees the necessary confidentiality in the context of its investigations to protect the whistleblower who has reported in good faith company facts of alleged violation of the Ethical Code, from possible forms of retaliation.
- 29.5 All other Recipients may report any violation or suspected violation of the provisions of this Ethical Code of which they become aware to their company contact person or to the management who will report in second instance to the Supervisory Body.
- 29.6 The Company undertakes to disseminate the Ethical Code, using the appropriate means of communication and company tools, information meetings and staff training.
- 29.7 All people must be in possession of the Ethical Code, know its contents and observe what is prescribed therein.
- 29.8 The Company, also on the basis of the indications of the Supervisory Body, prepares and implements a permanent training plan aimed at ensuring knowledge of the ethical principles and standards defined by this Ethical Code. Training initiatives are differentiated according to the role and responsibility of the people; for new hires, a specific training program is provided, which illustrates the contents of the Ethical Code which compliance is required.
- 29.9 The Supervisory Body and company management are available for any clarification and clarification regarding the Ethical Code.
- 29.10 It is the responsibility of everyone, in particular the management, to include the contents of the Code in the training programs and refer to it in all company procedures, policies and guidelines.
- 29.11 Any application doubts related to this Code must be promptly discussed with the Supervisory Body.
- 29.12 All those who collaborate with the Company, without distinction or exception, in Italy or abroad, are committed to ensuring compliance with the principles of this Code. In no way, acting to the advantage

of the Company can justify the adoption of behaviors in contrast with the law and with these principles.

29.13 In particular, all recipients are required to ensure that these rules are adequately applied and respected.

30. SANCTIONING CONSEQUENCES

- 30.1 Anyone who becomes aware of violations of the principles of this Ethical Code and / or the operating procedures that make up the Organizational Model or the internal control system in general, is required to promptly report them to the Supervisory Body. The reports must be made in written form, on paper or electronically, and must be collected and filed by the Supervisory Body.
- 30.2 The report must take place through the channels established by the Company and can also be made anonymously, it being understood that, in order to be taken into consideration, it must be based on precise and consistent facts and be able to bring out facts and situations by relating them to specific contexts.
- 30.3 The Company puts in place the necessary precautions, which protect the reporters from any type of retaliation, understood as an act that could give rise to forms of discrimination or penalization (for example, interruption of relations with partners, suppliers, consultants, etc.; denial employee promotions). To this end, the confidentiality of the identity of the whistleblower is ensured in accordance with Law 179/2017 (so-called Whistleblowing legislation), without prejudice to legal obligations.
- 30.4 The responsibility for carrying out investigations into possible violations of the Ethical Code lies with the Supervisory Body, which may possibly hear the author of the report, as well as the person responsible for the alleged violation: the staff is required to cooperate fully in any internal investigations.
- 30.5 Having ascertained the validity of the report, the SB:
 - a) for violations committed by employees, immediately notify in writing to the competent company management / function for the initiation of the resulting disciplinary actions;
 - b) for violations deemed justified, by management and / or top managers, immediately notify the Board of Directors;
 - c) for violations deemed justified, by the Directors of the Company, immediately notify the entire Board of Directors and the Board of Statutory Auditors.
- 30.6 Violations of the Ethical Code by personnel constitute a breach of the obligations of the employment relationship and / or a disciplinary offense, in compliance with the procedures provided for by art. 7 of the Workers' Statute, with all legal consequences with regard to the imposition of disciplinary sanctions, up to the termination of the employment relationship with consequent compensation for damages.
- 30.7 Compliance with the principles of this Ethical Code, formalized in contractual agreements through the insertion of a specific clause, is an essential part of the obligations of third parties (suppliers, experts, commercial partners) who have commercial relations with Glenair. Consequently, any violation of these principles in the context of the activities rendered by third parties in favor of the Company may constitute a cause for breach of contract with all legal consequences.

31. APPROVAL OF THE ETHICAL CODE AND AMENDMENTS

31.1 This Ethical Code is approved by the Board of Directors.

31.2 Any changes or updates are made in the same form and are communicated to the Recipients.