



ETHICAL CODE

Glenair Italia S.p.A.

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INDEX

- PREMISE –	4
CHAPTER I	5
- GENERAL PROVISIONS –	5
1. Scope of application and recipients	5
CHAPTER II	6
- PRINCIPLES –	6
2. Principles	6
3. Legality	6
4. Prevention of corruption	6
5. Prevention of conflict of interest	7
6. Professionalism and reliability	7
7. Transparency and correctness in managing company information	8
8. Confidentiality	8
9. Value of subject and human resources	9
10. Fairness in the contractual field	9
11. Protection of safety at work and the environment	9
12. Prevention of money laundering	10
13. Protection of competition	10
14. Protection of industrial and intellectual property	11
CHAPTER III	12
- RELATIONS WITH THE STAFF -	12
15. Introduction	12
16. Staff selection	12
17. Staff recruitment	12
18. Staff training	12
19. Involvement and participation of people	13
20. Health and safety	13
21. Protection of privacy	14
22. Duties of the staff	15
CHAPTER IV	17
- RELATIONSHIPS WITH THE PUBLIC ADMINISTRATION –	17
23. Introduction	17
24. Management of communication with the p.a.	18
25. Management of control activities	18
CHAPTER V	19
- RELATIONSHIPS WITH THIRD PARTIES –	19
26. Relationships with customers, suppliers and commercial partners	19
27. Relationships with external collaborators/consultants	19
28. Relationships with institutions and other organizations	19

CHAPTER VI 20

- SANCTIONING AND FINAL DISPOSITIONS- 20

29. The role of the supervisory body 20

30. Sanctioning consequences 21

31. Approval of the ethical code and amendmends..... 21

- PREMISE -

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

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

The Company, which has 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 (i.e., 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 at respecting a set of values and conduct rules that allow the Company to operate effectively and transparently and to prevent any incorrect behavior or the commission of offences by those working in its name and on its behalf.

For this purpose, 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, sets out the principles with which Glenair complies, by detecting the set of rights, duties and responsibilities that the Company expressly assumes towards those interacting with it in carrying out its business and from which expects the most rigorous observance by all recipients.

For this, the Company undertakes to ensure the maximum diffusion of this Ethical Code, by organizing an adequate training and awareness program on its contents.

CHAPTER I

- GENERAL PROVISIONS -

1. SCOPE OF APPLICATION AND RECIPIENTS

- 1.1 The set of principles, values and commitments listed in this Code of Ethics aim at inspiring the activity of all those contributing, in various capacities and with different responsibilities, directly or indirectly to the achievement of 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 with no exception, those cooperating with it – for any 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 behaviours in contrast with those here set out and, in general, with laws, regulations and disciplines.
- 1.4 Therefore, Glenair commits to disseminate this Code of Ethics among all interested parties, to correctly transmit all its contents and to make available tools that favour 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 measures necessary to carry out the verification and monitoring of the application of the Ethical Code, providing sanctions in the event of any violation.

CHAPTER II

- PRINCIPLES -

2. PRINCIPLES

2.1 The Company accepts and shares the ethical principles (hereinafter, 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 person and human resources;
- correctness in the contractual context;
- workplace safety and environment protection;
- prevention of money laundering;
- protection of competition;
- protection of industrial and intellectual property.

2.2 Recipients conform their conduct to Principles. In no case the belief of acting on behalf or for the benefit of Glenair can justify illicit behaviours.

3. LEGALITY

3.1 All conducts 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 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 shall undertake to comply with laws and regulations in force. This commitment shall also apply to consultants, collaborators, suppliers, customers and anyone having relations with the Company. For Glenair, in fact, the compliance with the law is a relevant tool for achieving its objectives, and therefore the Company will not start 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 shall be assigned clearly, within the Company, to competent and identified subjects.

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

4. PREVENTION OF CORRUPTION

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

4.2 In particular, Recipients representing the Company or acts on its behalf or have business relationships with it shall keep from any form of corruption with reference to both public and private subjects.

- 4.3 Glenair does not allow any form of payment or granting of advantages to customers, commercial counterparts 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 such principle and act in accordance with it.
- 4.5 Company employees can accept or offer gifts if they are directly connected to the activity performed, legitimate, of modest value, offered in a transparent and explicit way, occasional or delivered in 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 related decisions, 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 a third party other than that of the Company, namely carries out activities that may interfere with his ability to make decisions in the exclusive interest of the Company or the case in which he personally takes advantage of a business opportunity destined to the Company.
- 5.3 For example, 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 while carrying out their duties.
- 5.4 In the event of a conflict of interest, even if only potential, 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, Recipients, in the event of a conflict of interest, shall keep from contributing, directly or indirectly, to any decision or deliberation 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 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 conduct. All the activities carried out for the Company must be done with the utmost professional commitment, moral rigor, and managerial correctness, also to protect the image of the company.
- 6.2 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 responsibility entrusted, protecting Glenair's reputation.

- 6.3 Glenair requires Recipients to act loyally and in good faith in a spirit of mutual respect and collaboration, and to fulfil their contractual obligations and the required services.

7. TRANSPARENCY AND CORRECTNESS IN MANAGING COMPANY INFORMATION

- 7.1 The Company ensures maximum transparency of the management processes of the activities, including the completeness of accounting information, drawn up in a clear, complete, exhaustive manner and available for any verification. The support documentation shall specify the criteria used in evaluating 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 information flowing into the accounting, both general and analytical, must comply with principles of clarity, transparency, correctness, completeness and accuracy.
- 7.3 For each operation there must be adequate documentary support to be able, at any time, to carry out controls that certify that features and reasons for the operation and detect who has authorized, performed, registered, and checked the operation. All data concerning the handling shall be correctly and promptly registered in the accounts.
- 7.4 For the accounting documents to meet the requirements of truthfulness, completeness, precision and transparency of the data recorded, adequate and complete support documentation is kept in the Company's records, in order to allow:
- an accurate and faithful accounting registration;
 - an immediate identification of features and reasons underlying the transaction;
 - an easy reconstruction of the operating and decision-making process, and the identification of liability levels.
- 7.5 Each accounting entry must reflect the result of the relating support documentation. Therefore, it is necessary that the support documentation is kept carefully to be easily available.
- 7.6 When managing and executing company activities, it is required to supply transparent, truthful, complete, and accurate information even externally, and refrain 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 support documents of which he has become aware.

8. CONFIDENTIALITY

- 8.1 The Company ensures confidentiality and protects the confidentiality of information that are 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 confidentiality obligation extends, in addition to corporate data that are not already public and to the management methods of business processes, also to information on customers, experts, suppliers and commercial partners.
- 8.3 Without prejudice to the relevant regulations, recipients must guarantee the confidentiality of information to which they've had access, or which have treated during their working activities, even if such information is not specifically classified as confidential.
- 8.4 No Recipient can have any kind of direct or indirect benefit from the use of confidential information or Personal Data acquired during the activities carried out for the Company, nor communicate such information to others or recommend or induce others to use it.
- 8.5 Communicating confidential information to third parties can be done only by authorized subjects. The communication of information to third parties, allowed only for professional reasons, shall expressly indicate the confidentiality of information and require compliance with the obligation.
- 8.6 The obligation of confidentiality on information is imposed also on subjects with whom the Company has contractual or different relationships. Likewise, the Company undertakes to protect information on its employees and third parties, avoiding any improper use of it.

- 8.7 In the case of access to electronic information protected by password or data encryption systems, the latter can only be known by the assignees, who are obliged to keep it carefully and not disclose it.

9. VALUE OF SUBJECT AND HUMAN RESOURCES

- 9.1 The Company believes that human resources represent its main capital, therefore has procedures and methods for 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, to facilitate the performance of the tasks assigned and to enhance the professional skills of each one, also ensuring the involvement and empowerment of persons, regarding specific objectives to be reached and modalities to pursue them.
- 9.3 Human resources represent for Glenair an fundamental and precious value for developing and growing in its working area. The Company protects the value of the human individual and - in this perspective - does not tolerate discrimination, harassment, and personal offenses.
- 9.4 For this purpose, the Company promotes an organization of work based on respect, even during the selection of staff, of personality and dignity of each subject and which prevents, at any time, the creation of discomfort, hostility, or intimidating situations.
- 9.5 The Company also promotes the protection of individual freedom and individual personality. 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 behaviour based on age, sex, sexual orientation, race, colour, language, nationality, political and trade union opinions religious beliefs, marital and family status, disabilities, genetic information, or other personal characteristics not relevant to work occur in the workplace and when performing all company activities.
- 9.7 In the selection and management of personnel, the Company adopts criteria of equal opportunity, merit and enhancement of abilities, skills and potential of individuals, committing to ensure that authority is exercised with equity and correctness, avoiding any abuse.
- 9.8 The Company also guarantees the correct fulfilment of all regulatory obligations aimed at ensuring, by the employer, the correct remuneration and contribution of staff, 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 current regulations 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 among its employees and all those who access its offices and workplaces, takes all necessary and appropriate measures, based on the best technical-scientific knowledge, to ensure the absolute compliance of workplace with the highest standards of safety and hygiene.
- 11.2 The Company commits to guarantee working conditions that respect individual dignity and safety and health on work environments, also through the diffusion of a culture of safety and awareness of risks, by promoting a responsible behavior, also through training activities, in compliance with corporate procedures and the 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 processes, implementing actions aimed at improving

performances in terms of health and safety at work, up to the detection of areas for improvement and the reduction of the use of dangerous substances.

- 11.4 Each Recipient is called to share this value and contribute, within his own context, to maintaining the safety of the work environment in which they operate and to behave responsibly to protect health and safety.
- 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 full compliance with current legislation.
- 11.6 Environmental protection is recognized as a primary value to safeguard and therefore the Company aims at planning its activities by seeking a balance between the economic initiative and the essential needs of environmental protection, enhancing the improvement of its performances in terms of energy saving and sustainable development, ensuring the correct application of the technologies used to contain environmental impacts.
- 11.7 The Company promotes actions aimed at controlling the emissions into the atmosphere, differentiating waste, recycling, and correct disposal of waste, paying attention to the choice of suppliers 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 aspect, ensuring complete and exhaustive communications with the community, in full compliance with the TU Law Decree no. 152/06 and current legislation.
- 11.9 Environmental protection is considered a primary objective and is therefore pursued starting from individual behavior of people working for the Company, who are provided with the information and instructions necessary for the purposes of "energy saving", "waste management", and of recyclable material.

12. PREVENTION OF MONEY LAUNDERING

- 12.1 The Company's commitments regarding correctness, transparency and honesty mean maximum transparency in commercial operations and 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 payment means that guarantee their traceability.
- 12.3 The Company rejects any conduct aimed at employing, replacing, transferring, or concealing sums of money whose illicit origin, either internal or external to Glenair, is known or suspected. Consequently, Recipients cannot start business relationships on behalf of the Company with partners, customers, suppliers or third parties not giving warranties of integrity, not having a good reputation or whose name is associated with cases of money laundering.

13. PROTECTION OF COMPETITION

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

14. PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY

- 14.1 The Company ensures, in implementation of the legality principle, 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 copyrights, preventing in this perspective conducts aimed at duplicating and reproducing in any form and with no rights the work of others.

CHAPTER III

- RELATIONS WITH THE STAFF -

15. INTRODUCTION

- 15.1 The Company recognizes the value of human resources, the respect for their autonomy and the importance of their participation in corporate activities.
- 15.2 The management of the employment relationship is aimed 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 professionalism and individual work skills of its employees, as values and requirements determining in achieving the ideal corporate objectives.
- 15.4 The Company adopts the principle of corporate delegation, by 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, to ensure 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 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, guaranteeing equal opportunities for the parties interested.
- 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 annual or interim objectives are established, either general or individual, these are focused on a possible, specific, concrete, and measurable result, which is related to the expected time for their achievement.
- 16.4 Any discrimination on race, sex, nationality, religion, language, trade union membership or political belief is forbidden in hiring, retribution, promotion or in firing, as well as any form of favoritism.

17. STAFF RECRUITMENT

- 17.1 The recruitment of staff takes place with regular employment contracts, as no form of employment relationship that is not compliant or otherwise elusive with the current provisions of law is allowed.
- 17.2 At the start of the employment relationship, each employee receives information on:
 - characteristics of the function and duties to be performed;
 - regulatory and remuneration elements, as regulated by the national collective labour agreement;
 - rules and procedures to take 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 its 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 personal 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 the hiring and in any further professional transition, job rotation, etc.

19. INVOLVEMENT AND PARTICIPATION OF PEOPLE

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

20. HEALTH AND SAFETY

- 20.1 The Company commits to offer a work environment capable of protecting the health and safety of its staff, considering this obligation a productive investment and a factor of growth, and added value.
- 20.2 Glenair undertakes to protect the moral and physical integrity of its employees, consultants, collaborators, and all interlocutors.
- 20.3 For this purpose, it promotes responsible and safe behaviors, takes all the safety measures requested by the technological evolution to ensure a safe and healthy working environment, in full compliance with the current legislation on protection and prevention, also, to prevent the crimes referred to in Article 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 (Law Decree 81/2008 art. 30, TU 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) information and training of workers;
 - f) supervisory activities with reference to the compliance of workers with the procedures and instructions for working safety;
 - g) the acquisition of mandatory legal documentation and certifications;
 - h) periodic checks on the application of the effectiveness of the procedures taken.
- 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 risks.
- 20.6 Regarding health and safety in the workplace, decisions, both at an operational and top level, are taken and implemented by the Company on the following fundamental principles and criteria (ex-art. 6 co. 1 and 2 of the European Directive no. 89/391):
- Avoiding risks;
 - Assessing risks that cannot be avoided;
 - Combating risks at source;

- Adapting the activity to the worker, in particular with regard to the design of workplaces and the choice of equipment and methods of work and production, to reduce monotonous and repetitive work and to reduce effects of these activities on health;
 - Considering the degree of technical evolution;
 - Replacing what is dangerous with what is not dangerous or is less dangerous;
 - Planning prevention, aiming at a coherent complex which integrates the technique, work organization, working conditions, social relations and the influence of factors in the work environment;
 - Giving priority to collective protection measures over individual protection means;
 - 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 the full and timely compliance with rules and internal procedure, 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 For this purpose, a capillary internal structure, attentive to the evolution of the reference scenarios and 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 to systematically reduce the risks for the staff in accidents and occupational diseases. This objective is considered strategic for the Company, which intends to pursue it with a view on 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 based on what is established in the Document, whose timely updating and maintenance is ensured with the assistance 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 Company.

21. PROTECTION OF PRIVACY

- 21.1 In processing the personal data of its personnel, the Company complies with the provisions contained in (EU) Regulation n. 679/2016 "relating to the protection of natural subjects with regard to the

processing of personal data, and the free circulation of such data and abrogates the Directive 95/46/CE (general regulation on data protection)" - (also called "**Regulation**" or "**GDPR**").

- 21.2 The regulation is applied by the Company as a primary warranty tool; therefore, it is integrated in its management system. The staff receives adequate training on the procedures and operating instructions received and is required to fully comply with them and promptly apply them.
- 21.3 Privacy information is given to subjects, and this contains: the data controller, the type of data processed, purposes and modalities of the treatment, the legal basis of the processing, any subject to whom data is communicated, the type of data collection, the retention period and information necessary to exercise the rights referred to in Articles 15-21 of the Regulation.
- 21.4 In the cases in which law requires it, people are asked to give consent for processing their personal data.

22. DUTIES OF THE STAFF

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

- ***Confidentiality of company information:***

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

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

- ***Use of company assets:***

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

- use the entrusted assets scrupulously and sparingly;
- guard and preserve the company assets entrusted in the context of business and use them appropriately and in accordance with the company interest, having conducts that reasonably prevent their improper use by third parties;
- avoid improper use of company assets, which may cause damage or reduction in efficiency, or contrary to the interest of the Company;
- adequately guard the resources entrusted and promptly inform the units in charge of any threats or events resulting harmful for the Company.

About IT applications, each person is required to:

- scrupulously adopt the provisions of the corporate security policies, to not compromise the functionality and protection of computer systems;
- refrain from sending threatening or insulting e-mail messages, or from using low-level language, or from making inappropriate comments that may offend subjects and/or may damage the corporate reputation;
- keep from browsing Internet sites with indecent and offensive contents, and not related to professional activities.

The Company reserves the right to prevent the distorted use of its assets and infrastructures, by using accounting, reporting, financial control and risk analysis and prevention systems, with no prejudice

to the compliance with the provisions of current laws (privacy law, workers' statute, etc.) and ensuring preventive information to the personnel concerned.

Each Recipient is required to:

- not use, for private interests or purposes, computer assets or equipment available for working purposes. Each employee is responsible for the security of the IT systems used and is subject to the current law dispositions and the conditions of the license agreement;
- 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;
- make the necessary efforts to prevent the possible commission of offences by using computer tools.

- ***Gifts, homages, and other benefits:***

It is not permitted to offer or receive directly or indirectly money, gifts, or benefits of any kind to or from third parties (Public Administration, associations, other similar organizations, clients, suppliers, etc.) to obtain undue advantage for themselves or the Company, influencing the recipient's independent judgment. Acts of commercial courtesy, as homages or forms of hospitality, are allowed only if these are compliant with defined business procedures.

- ***Information obligations:***

All employees are required to report promptly and confidentially to their department manager and/or to the Supervisory Body any information of which they become aware while performing their tasks, regarding violations of legal regulations, of the Code of Ethics or other company dispositions that may involve the company for any reason. Function managers must supervise the activities of their employees and 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 company employees are required to refrain from personally taking advantage of business opportunities, of which they became aware while performing their functions. Each employee shall keep 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.

Situations that may generate a conflict of interest identifiable by way of example in the following situations are expressly prohibited:

- Exercising an activity on their own in competition with the Company, including the case when this is exercised by family members;
- Having economic interests with suppliers, customers or competitors;
- Accepting money or favours from people or companies having or intending to have business relationships with the Company;
- Accepting or receiving any gift, gratuity, or homage with a monetary value rather than a symbolic one, from suppliers, customers, or other entities with which they have an ongoing professional relationship.

If even the appearance of a conflict of interest arises, the person is required to communicate it and is also required to inform about the activities carried out outside the workplace, whether these they may appear in conflict of interest with the Company.

CHAPTER IV

- RELATIONSHIPS WITH THE PUBLIC ADMINISTRATION -

23. INTRODUCTION

- 23.1 Relationships with the Public Administrations, either central and peripheral, national and/or foreign ones, with Italian or foreign public officers and public service officers, with Independent Administrative Authorities, with investee companies, with municipal companies and, any relationship of a public nature, are inspired by the most rigorous observance of 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 the relationships with supervisory authorities or other independent authorities, representing Public Administrations, social security institutions, bodies responsible for the collection of taxes, etc.
- 23.3 Recipients must, as far as they are concerned:
- ensure that relationships with public officers are managed exclusively by subjects with suitable powers and that such relationships take place in compliance with laws, regulations in force, principles of loyalty and correctness;
 - carry out the obligations towards the Public Administration, with the utmost diligence and professionalism so to provide clear, accurate, complete and true information, avoiding and reporting situations of conflict of interest;
 - ensure that the documentation to be sent to the Public Administration is produced by subjects competent and previously identified and that this is always priorly shared with the reference supervisor;
 - 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 officers, public service officers and representatives of Public Administrations, taking care to keep the documentation exchanged and that supporting the data and information provided and decisions made;
 - ensure that the procedures relating to the request, issue and maintenance of licenses, authorizations, or concessions, and to relationships in general with the authorities that carry out judicial, inspection and regulatory functions are managed only by competent functions and are based on the principles of legality, transparency, collaboration, and fairness.
- 23.4 In these relationships, Recipients shall not improperly influence the decisions of the officers who negotiate or decide on behalf of the Public Administration, refraining from any behaviour that may compromise the impartiality and independence of judgment of the Public Administration.
- 23.5 Therefore, Recipients are forbidden to:
- offer, give, pay, accept any request for money or other benefits to/from public officer 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 officer to promote or favour the interest of the Company improperly or in any case in violation of applicable laws;
 - make services or payments in favour of collaborators, suppliers, consultants, partners or other third parties working 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 or in relation to the type of assignment to perform and the local practices in force;
 - resort to other forms of aid or contributions (homages, assignments, consultancy, assistance, etc..) that have the same purposes prohibited in the previous point;

- exercise undue pressure and influence on public officers, subjects 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;
- keep a deceptive conduct that may induce 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 officers to induce them into evaluation errors during the analysis of requests for authorizations and similar.

23.6 It is expressly forbidden to use documents containing untrue data or to omit relevant information relations with the Public Administration in one's favour 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, in 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, to obtain undue advantage for Glenair.
- 24.2 If 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 takes always place in compliance with the requirements of professionalism, independence and competence.

25. MANAGEMENT OF CONTROL ACTIVITIES

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

CHAPTER V

- RELATIONSHIPS WITH THIRD PARTIES -

26. RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS AND COMMERCIAL PARTNERS

- 26.1 Glenair aims at the maximum satisfaction of its customers by guaranteeing availability and prompt response to their needs, along with 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 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:
- 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, financial ones included, 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 requested requirements, 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 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 of carrying out support activities to criminal organizations of any type.

27. RELATIONSHIPS 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 Code of Ethics.
- 27.2 The Recipient who identifies the conduct of an external collaborator / consultant who does not adhere to this Code shall promptly communicate it to the Supervisory Body.

28. RELATIONSHIPS WITH INSTITUTIONS AND OTHER ORGANIZATIONS

- 28.1 Relationships with institutions are based on the utmost rigor, transparency, and correctness in compliance with institutional roles. Analogous behavioural rules characterize the political and trade union relationships that Glenair maintains.
- 28.2 The Company supports initiatives promoted by organizations with a proven reputation and for worthy purposes (i.e., social, moral, scientific, cultural, charitable or solidarity aims) 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 to obtain material, commercial or personal advantages, are not allowed.
- 28.4 Glenair rejects any relationship with national or foreign organizations that pursue, directly or indirectly, purposes prohibited by law, contrary to ethics or public order or violating fundamental rights of the individual.

CHAPTER VI

- SANCTIONING AND FINAL DISPOSITIONS-

29. THE ROLE OF THE SUPERVISORY BODY

- 29.1 With the approval of the Organizational, Management and Control Model ex Law Decree 231/01 of which the Ethical Code is an integral and essential part, the Supervisory Body of Glenair (**OdV**) has been established; this is a body to which is entrusted the task to oversee the functioning of the Model and its updating.
- 29.2 Control over compliance with the Code of Ethics is left to the Supervisory Body established pursuant to Legislative Decree 231/2001. Consequently, the staff can address any doubts to this 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.

The following tasks are the responsibility of the Supervisory Body:

- communicating to the Human Resources Manager, for taking the appropriate measures and on reports received regarding violations of the Ethical Code;
 - monitoring compliance with the Ethical Code, having access to all the Company's sources of information for this purpose and suggesting appropriate updates, also based on the reports received from the staff;
 - expressing binding opinions on the revision of the most relevant policies and procedures, to guarantee consistency with the Code of Ethics;
 - contributing to the periodic review of the Ethical Code: for this, the OdV formulates the appropriate proposals to the Board of Directors, which evaluates them and, possibly, 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 fully collaborate in favoring the performance of functions of the Supervisory Body.
- 29.4 In the event of a reporting, the Supervisory Body guarantees the necessary confidentiality in the context of its investigations to protect the reporter who has reported in good faith business facts on alleged violation of the Code of Ethics, from possible forms of retaliation.
- 29.5 All the 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 refer it in second instance to the Supervisory Body.
- 29.6 The Company commits to disseminate the Ethical Code, using the appropriate communication means and corporate tools, information meetings and staff training.
- 29.7 All people must be in possession of the Ethical Code, know its contents and observe what prescribed.
- 29.8 The Company, also because 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 subjects; for new hires a specific training program is provided, which illustrates the contents of the Code of Ethics whose compliance is required.
- 29.9 The Supervisory Body and the company management are available for any clarification, regarding the Ethical Code.
- 29.10 Everyone is responsible, in particular the management, for including the contents of the Code in training programs and refer to it in all company procedures, policies and guidelines.
- 29.11 Any application doubts related to this Code shall be promptly discussed with the Supervisory Body.
- 29.12 All those collaborating with the Company, either in Italy or abroad with no distinction or exception, are committed to ensuring compliance with the principles of this Code. In no way, acting to the advantage of the Company can justify conducts in contrast with the law and 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 operating procedures that make up the Organizational Model or the internal control system shall promptly report.

Reporting on violations of the Code of Ethics is done using the platform established by the Company, which is accessible by the corporate website, according to provisions on whistleblowing contained in Law Decree 24/2023.

30.2 The reporting must take place through the channels established by the Company and can be made anonymously, it being understood that to be taken into consideration this 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, that protect the reporters from any type of retaliation, intended as act which may give rise to forms of discrimination or penalization (i.e., interruption of relationships with partners, suppliers, consultants, etc.; negation of promotion to employees). For this purpose, the confidentiality of the identity of the whistleblower is ensured in accordance with Law Decree 24/2023 (so-called Whistleblowing legislation), without prejudice to law obligations.

30.4 The responsibility for carrying out investigations on possible violations of the Code of Ethics lies with the Manager of the reporting, which is detected within the Supervisory Body, and which could possibly hear the author of the reporting and the responsible of the alleged violation: the staff shall fully cooperate during internal investigations.

30.5 Having ascertained the validity of the report, the OdV:

- a) for violations committed by employees, notifies immediately in writing to the competent company management/function to start the resulting disciplinary actions;
- b) for violations deemed as justified, by managers and/or supervisors, it notifies immediately the Board of Directors;
- c) for violations deemed as justified, by Administrators of the Company, it promptly informs the entire Board of Directors and Board of Statutory Auditors.

30.6 Violations of the Code of Ethics by personnel are a breach of the obligations of the employment relationship and/or disciplinary offense, in compliance with procedures provided by art. 7 of the Workers' Statute, with all legal consequences regarding the imposition of disciplinary sanctions, up to the termination of the employment relationship with consequent compensation for the damages derived.

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 obligations of third parties (suppliers, experts, commercial partners) having commercial relationships with Glenair. Consequently, any violation of these principles in the context of the activities rendered by third parties in favour of the Company can be 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 Recipients.