



CODE OF CONDUCT

ATR
PROPELLING THE NEXT CONNECTION

A MESSAGE FROM OUR CEO

Dear Colleagues,

As the leader in regional aviation, ATR must set the example in all of its fields of activity. This applies specifically in the field of Ethics and Compliance, where our goal is a full engagement in applying the highest moral and ethical principles at all moments of our work life at ATR both in our relationships with the outside world and inside our group of companies.

In line with this engagement, Ethics and Compliance has been made part of the company's top targets for this year together with, and at the same level as, more concrete business objectives.

As a matter of fact, the business objectives are of utmost importance. But the way we achieve these objectives is as crucial as their very achievement. To remain the leader on our market, we have to maintain our reputation and polish our corporate image, and this cannot go without living by the highest standards in terms of Ethics and Compliance. It is not enough to avoid sanctions and fines which non ethical behaviors will inevitably trigger, we have to place our ethics and integrity principles at the heart of our daily work at ATR.

This is why ATR has a zero tolerance policy towards illegal and corrupt practices and will under no circumstances tolerate undertakings that harm our values or contravene the applicable regulations.

In the frame of our Ethics & Compliance program, the ATR Legal Directorate has issued and regularly updates a set of principles, directives and procedures which include ATR's

Integrity Principles, the Conflict of Interest Directive, the Sponsorship & Donations Policy, the Principles on Gifts and Benefits, the Business Development Anti-Corruption Policy and the Export Control Directive.

Regular training sessions will also help us all to understand, embrace and defend our integrity values around the globe. This allows for these principles to be shared with, and known to, each and every employee at ATR and at its subsidiaries.

In summary, I rely on each and every one of you to bring our ethics and integrity values to life. This will allow for trust and respect to govern our relationships with all of our counterparts (customers, suppliers, institutions and other stakeholders), thereby contributing to ATR being seen as the undisputed leader on the regional aviation market.



Christian Scherer

This Code of Conduct **sets out the key principles and values** that must be implemented and followed not only by each employee, trainee, external co-worker (interim, subcontractor, etc.), director & manager of ATR but also those of any entities over which ATR has control (hereinafter referred to as “ATR’s subsidiaries”) in her or his day-to-day work.

This Code of Conduct, which has been endorsed by the Assembly of Members of ATR, **is one of the cornerstones of ATR’s Ethics & Compliance** program and is necessary to make integrity and compliance a reality and an inherent part of our business culture.

This Code of Conduct **contains several cross-references to additional directives and documents** that provide detailed guidance for certain specific matters. These additional directives and documents are available on ATR’s intranet as well as on ATR’s quality portal.

This Code of Conduct and the cross-referenced documentation cannot address all of the specific situations you may encounter. Therefore, when in doubt, you are strongly encouraged to seek advice or to raise concerns with your management, the Human Resources Directorate, the Ethics & Compliance team or by using the *OpenLine* system that is available on ATR’s intranet.

Any breach of our compliance rules may result in civil and/or criminal proceedings against ATR and its affiliates, and against the individuals involved. Such individuals will also be subject to appropriate disciplinary sanctions.

It is our responsibility to maintain and to nurture a compliance culture based on “Speak Up”.

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COMPLIANCE CONTACTS

For suggestions, questions or guidance in understanding and applying this Code of Conduct, you may contact ATR’s Ethics & Compliance team who can provide support and assistance:

E-mail: **Compliance@atr-aircraft.com**

PEOPLE

ATR recognises the need to create a pleasant working environment where **EQUALITY, FAIRNESS, RESPECT, SOLIDARITY, INTEGRITY, HONESTY AND TRANSPARENCY** guide the interactions with our co-workers, customers, suppliers and other stakeholders.

ATR is committed to ensuring the highest health, safety and security standards in the workplace. We must comply at all times with all the applicable health and safety laws and internal policies and procedures.

Individuals are employed and selected for career advancement on the basis of their qualifications, their potential, their performance, their behavior and their willingness to work in different functions and entities.

ATR is committed to the continual improvement of its employees at all levels by encouraging employees to take part in regular seminars and training sessions.

ATR supports diversity in race, gender, religion, citizenship, national origin, political opinion, sexual orientation, social origins, age and physical or mental character.

Discrimination of any nature as well as harassment whether physical, visual or verbal shall not be tolerated.

WHAT IS HARASSMENT?

Generally speaking, "harassment" is any form of behavior with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive work environment.

SPEAK UP

ATR PROMOTES A TRUSTWORTHY ENVIRONMENT, WHERE OPEN AND CONSTRUCTIVE DIALOGUES CAN TAKE PLACE BETWEEN CO-WORKERS AND WITH MANAGEMENT.

ATR will not tolerate any retaliation or attempted retaliation against people who have made reports in good faith or who are assisting investigations of suspected violations of the law, of this Code of Conduct or of any of the documents it refers to.

Those who wish to clarify a concern, seek advice or submit a complaint can always contact their manager, the Human Resources Directorate, the Ethics & Compliance team or use the OpenLine tool that is available at www.airbusgroupopenline.com. All reports or questions will be kept confidential and will be investigated promptly and thoroughly. Feedback on results of the investigation will be provided in a timely manner.



PROTECTING ASSETS

WE MUST PROTECT ATR'S ASSETS, SUCH AS EQUIPMENT, TOOLS, FACILITIES, SUPPLIES, SOFTWARE, DATA, INFORMATION SYSTEMS AND TELECOMMUNICATIONS, to ensure that none of these assets are stolen, damaged, misused or improperly destroyed.

We must use and treat all of ATR's assets that are entrusted to us, in a safe, ethical, lawful and productive

WHAT ARE ATR ASSETS?

- Physical property, such as facilities, plant equipment, tools and inventory, securities and cash, office equipment and supplies, information systems and software.
- Confidential and proprietary information, which includes information not yet publicly disclosed and internal business information, such as contract documentation, business processes, corporate strategies and business plans.

manner, as if they were our own property. ATR's assets should be exclusively used in support of ATR business objectives and should under no circumstances be used to pursue an illegal or improper purpose.

In our day-to-day work we must always ensure that we secure and protect ATR's intellectual property and avoid infringing the intellectual property rights of others.

WHAT IS INTELLECTUAL PROPERTY?

Creative ideas and expressions of the human mind that possess commercial value such as patents, trademarks, copyrights, "know how", technical information and any other "unregistered" intellectual property.

Key ATR Documents to Reference:



- **Instructions and behavior guidelines for sound management of the company's assets**
- **Charte ATR d'utilisation sécurisée des systèmes d'information et de communication**

MAINTAINING ACCURATE RECORDS

OUR MEMBERS, BUSINESS PARTNERS, GOVERNMENT AUTHORITIES AND ANY RELEVANT STAKEHOLDER RELY ON THE ACCURACY AND CORRECTNESS OF THE INFORMATION ATR PROVIDES.

We therefore have a responsibility to ensure that the information we provide to such stakeholders is accurate, complete and understandable to all.

We must maintain our financial records in strict compliance with the applicable laws and regulations, as well as with our internal control procedures. We may not create or participate in the creation of records that mislead or conceal improper activities.



PROTECTING PERSONAL DATA & CONFIDENTIAL INFORMATION

ATR COLLECTS, PROCESSES AND USES THE PERSONAL DATA OF ITS EMPLOYEES, PARTNERS AS WELL AS OTHER STAKEHOLDERS. IN DEALING WITH SUCH DATA, ATR COMPLIES WITH ALL APPLICABLE LAWS AND REGULATIONS.

Customers, suppliers, governmental authorities and other stakeholders often entrust ATR with their own confidential and proprietary information. We must handle this third-party confidential or proprietary information in accordance with the terms of its disclosure and in strict compliance with all applicable laws and regulations.

Access to confidential and proprietary information is strictly on a need-to-know basis. This information can only be revealed to formally authorised co-workers or outside parties who need this information for legitimate business purposes, or if required by law. Before any confidential information is disclosed or received by any business counterpart, a Non-Disclosure Agreement must be signed.

We shall not accept, ask for or disclose third-party proprietary or confidential information unless the owner of such information has agreed to its transfer. If we receive third-party proprietary or confidential information without authorisation, it shall be promptly reported to the Legal Directorate.

MANAGING COMMUNICATION



ATR'S REPUTATION AND IMAGE MUST BE PROTECTED AND PROMOTED AT ALL TIMES WITH THE SUPPORT OF THE COMMUNICATION DEPARTMENT.

All public statements, disclosures of information or responses to media requests must be approved by the competent people within ATR's Communication department.

The Communication department is in charge of the management of ATR's image, social media presence and all communication related matters.

We must not act on behalf of ATR by providing information to the media or engaging in social media activities. We are required to direct all media questions and enquiries to the Communication department.

The disclosed information and content of published material, such as brochures, advertisement and editorial support, should be accurate and should not degrade the products, services or employees of our competitors.

ZERO TOLERANCE OF CORRUPTION

CORRUPTION AND INFLUENCE PEDDLING OF ANY KIND, WHETHER INVOLVING PUBLIC OR PRIVATE ENTITIES OR INDIVIDUALS, ARE STRICTLY FORBIDDEN. THEREFORE WE MUST NEVER:

- offer, attempt to offer, give, authorise or promise any sort of bribe (i.e. anything of value), facilitation payment or kickback to any individual or entity for the purpose of obtaining or retaining business or any improper advantage.
- solicit, receive or accept a bribe, facilitation payment or kickback from any individual or entity.

Specific laws and regulations apply to relationships with public officials and their family members. Extra caution shall therefore be applied when dealing with public officials and their family members.

We must never hire someone else to do something that cannot be ethically or legally done by ourselves. *The Business Development Anti-Corruption Policy* applies to all business development activities involving third parties.

We must not remain willfully ignorant of, or turn a blind eye towards, any kind of corruption or influence peddling. We are all responsible for ensuring that these rules are applied by each and every one of us.

Exceptionally, facilitation payments may be tolerated if they are made to safeguard the health, safety or welfare of a person. In such case, ATR's Ethics & Compliance team should be contacted immediately.



QUESTIONS&ANSWERS

QUESTION : You meet the representative of an airline who asks if his son can take part in an internship at ATR. How to react to this proposal?

ANSWER: Treat such request with caution, as an offer of internship is likely to be considered as an advantage. Therefore, explain to the representative that you are not looking for candidates but that his son may apply for an internship via ATR's normal recruitment procedure.

Q : A supplier is taking part in a tender that is organised by ATR and offers you a gift in exchange for your positive recommendation for such supplier during the selection process. How to react to this proposal?

R : Such proposal must be refused, documented and declared to ATR's Ethics & Compliance team.

Q : To maintain a good business relationship with a customer, you want to offer him a box of chocolates for the New Year. Is that acceptable?

R : Yes, as long as it is a low value gift that is offered at a time when gifts of this nature are usually exchanged. For additional information on the exchange of gifts and hospitality please refer yourself to the applicable directive.

Q : You want to organise a training session for representatives of a customer located abroad. Following the training, the head of the delegation asks you to organise a weekend in a fancy hotel in Naples.

R : This proposal must be rejected courteously but firmly as the approval of such advantage could compromise their independence, as well as ATR's reputation, because it is essentially recreational and of excessive value, which is contrary to ATR's policy. However you can assist him or her by for example advising him or her where to stay or by making a reservation in a hotel if he or she does not speak Italian.

Q : A former member of local government proposes to carry out consulting activities for ATR, claiming that he will use his relations within the government to obtain the necessary administrative authorisations for the development of ATR's business in such country.

R : The payment of a sum of money to a person to abuse of his influence within a public authority in order to obtain a favorable decision is defined as influence peddling, which is strictly forbidden. It is therefore advisable to treat any consultancy mission with particular caution and to ensure its legality with the assistance of ATR's Ethics & Compliance team.

Q : You are required to travel abroad in two weeks and must therefore obtain a visa urgently. At the embassy, the public official informs you that you will only obtain your visa in one month, but offers you to speed up the procedure in exchange for a 50 Euro note. How to react to this proposal?

R : Such kind of practice is defined as a facilitation payment and is therefore prohibited. You must therefore refuse such type of arrangement, regardless of the amount, and inform your management of the delay.



WHAT IS CORRUPTION?

The promise of offering or giving, soliciting or receiving - directly or indirectly - any undue monetary or other advantage to or from another person so that this person, in breach of his or her duties, acts or refrains from acting to obtain or retain business or other improper advantages.

WHAT ARE FACILITATION PAYMENTS?

Small unofficial payments to low-level public officials to speed up or obtain routine administrative processes.

WHAT IS INFLUENCE PEDDLING?

It is the practice of offering, directly or indirectly, donations, promises, hospitality, gifts or advantages of any kind to a public official or a private person, so such person abuses her/his real or alleged influence for the purpose of obtaining from a public authority, whether domestic or foreign, authorisations, employment, public contracts or any other favorable decision.



Key ATR Document to Reference:

• **Business Development Anti-Corruption Policy Directive**

MANAGING GIFTS AND HOSPITALITY

ATR RECOGNISES THAT GOOD AND LONG-LASTING BUSINESS RELATIONSHIPS MAY INVOLVE THE EXCHANGE OF GIFTS OR HOSPITALITY ON APPROPRIATE OCCASIONS.

However, when given inappropriately, gifts or hospitality may be construed as an attempt to unduly influence the recipient. This risk exists whether the gift or hospitality is given or received, and whether the third party is a public official or works in the private sector.

Those who are in a position to exchange gifts or hospitality with third parties must analyse each situation carefully to ensure that the proposed gift or hospitality, whether it is given or received, is ethical, legal and complies with the terms of the *Gifts and Hospitality Directive*.

In order to insure full transparency, any giving or receiving of gifts or hospitality must be fully and accurately recorded by using the template that is available on ATR's intranet, and approved if required under the applicable directive.

IDENTIFYING AND MANAGING CONFLICTS OF INTEREST

ATR IS COMMITTED TO PUTTING THE COMPANY'S INTERESTS AHEAD OF ANY DIRECT OR INDIRECT PERSONAL INTEREST, THEREFORE INSURING THAT ALL DECISIONS ARE BASED SOLELY ON THE MERITS OF EACH OPTION.

We must avoid both actual and potential conflicts of interest at all times as they can influence our judgment, objectivity or loyalty to ATR.

Conflict of interest situations, which may arise at any time, are not bad per se but need to be declared and managed in accordance with the relevant directive & procedures dealing with conflicts of interest.

We should take particular care when hiring, current or former, public officials or government employees as employees, consultants or subcontractors.

WHAT IS A CONFLICT OF INTEREST?

A conflict of interest arises when our personal interests interfere, or appear to interfere, with our ability to perform our jobs without bias in ATR's best interest. For example, a conflict might arise when an employee, family member, near relative or personal friend has a significant undisclosed financial interest in a customer, supplier, partner or competitor of ATR.



Key ATR Documents to Reference:

- **Gifts & Hospitality Directive**
- **Gifts & Hospitality Country List**
- **Gifts & Hospitality Recording & Approval Form**



Key ATR Documents to Reference:

- **Conflict of Interest Directive**
- **Conflict of Interest Declaration Procedure**
- **Conflict of Interest Declaration Form**

AVOIDING MONEY LAUNDERING

ATR WILL CONDUCT BUSINESS ONLY WITH REPUTABLE CUSTOMERS WHO ARE INVOLVED IN LEGITIMATE BUSINESS ACTIVITIES AND WHOSE FUNDS ARE DERIVED FROM LEGITIMATE SOURCES.

Consequently, before any business can be undertaken ATR will perform *Know Your Customer* (KYC) due diligence procedures.

WHAT IS MONEY LAUNDERING?

It is the process by which a person or company makes illegally obtained proceeds ("dirty money") appear legitimate ("clean").

COMPETING FAIRLY

WE MUST STRICTLY COMPLY WITH APPLICABLE COMPETITION LAWS IN THE COUNTRIES WHERE WE DO BUSINESS. These laws forbid agreements or behavior that may restrain or alter competition or trade.

We should take particular care when exchanging or disclosing commercially sensitive information relating to competitors, customers or suppliers, especially during tenders. In doubt, you may contact the Legal Directorate.



Key ATR Document to Reference:
• **Antitrust Dos and Don'ts**

IMPORT AND EXPORT CONTROL

ATR PURCHASES AND SELLS GOODS AND SERVICES FROM A WHOLE ARRAY OF CUSTOMERS AND TO SUPPLIERS LOCATED AROUND THE WORLD.

It is therefore essential that each import and export is controlled to ensure compliance with all applicable laws and regulations that govern these activities.

The Ethics & Compliance team is on hand to answer any questions or concerns related to the import or export of goods, services or information.

WHAT IS AN "EXPORT"?

An export occurs when goods, services, technologies or software are transferred to another country or when goods, services technology or software are transferred to a foreign person or company wherever they are located. Export occurs when the transfer is carried out orally, via email, by post, hand-carried, through a server, etc.



Key ATR Document to Reference:
• **Export Control Directive**

RELATIONSHIP WITH STAKEHOLDERS

IN THE COURSE OF OUR BUSINESS, ATR OFTEN COOPERATES WITH LEGITIMATE NATIONAL AND INTERNATIONAL AUTHORITIES for a whole array of matters such as export licenses or aircraft certifications. In dealing with such authorities, we must ensure that all matters are dealt with in a professional, timely and compliant manner. Any investigation or inquiry from such authorities must be coordinated with the Corporate Secretary and the Legal Directorate.

The Procurement Directorate is responsible for ensuring that ATR's relationship with suppliers is handled in an equitable and compliant manner. We must ensure that our relationships are formalised to the upmost and that the selection of each supplier is solely based on the merits of each offer.

ATR is committed to engaging in responsible sourcing with suppliers that embrace the highest standards of integrity. ATR has a responsibility to ensure that its supply chain complies with all applicable laws and regulations, upholds the highest health and safety standards and implements integrity principles similar to our own. Suppliers may therefore be asked to provide evidence of their engagements in particular in the fields of business ethics, anti-corruption, human rights (e.g. anti-human trafficking, anti-child labor), labour standards and environmental sustainability.

ATR will conduct business only with reputable stakeholders that embrace the highest standards of integrity. Consequently, before any business can be undertaken, ATR has a responsibility to perform appropriate due diligence, which may include *Know Your Customer* (KYC) and *Know Your Supplier* (KYS) procedures.

SAFETY AND QUALITY

TO FULFILL OUR COMMITMENT TO PROVIDING PRODUCT QUALITY & SAFETY TO OUR CUSTOMERS, ATR MUST COMPLY WITH THE HIGHEST SECURITY & QUALITY CONTROL STANDARDS, ALL INTERNAL CONTROL PROCEDURES & POLICIES AS WELL AS ALL APPLICABLE LAWS AND REGULATIONS. Product quality or safety should never be sacrificed and should not stop once the product is delivered.

We must continually keep in mind the safety of our products and services, and maintain the highest safety standards. Product safety depends heavily on information and feedback that is provided, and we are therefore strongly encouraged to immediately provide any reports, concerns or information regarding safety. We are committed to ensuring that our products are designed, manufactured, delivered and supported in accordance with the highest security standards.

We must constantly develop and strengthen all activities related to quality as excellence in such field is our overriding priority. We should each have a clear understanding of our role and responsibility with respect to quality during the entire product lifecycle. We are expected to alert, stop and resolve any issue that we come across.



Key ATR Document to Reference:

- **Flight Safety Policy**
- **Flight Safety Voluntary Reporting Process**
- **Quality Policy**

SUPPORTING OUR COMMUNITIES

AS THE LEADER IN REGIONAL AVIATION, ATR ACKNOWLEDGES ITS RESPONSIBILITY TOWARDS THE AVIATION INDUSTRY, THE LOCAL COMMUNITIES, INNOVATION, EDUCATION, THE ENVIRONMENT AND SUSTAINABLE DEVELOPMENT, AND STRIVES TO MAKE VALUABLE CONTRIBUTIONS IN THESE FIELDS.

ATR may therefore contribute to such fields by donating or sponsoring events, conferences, foundations, institutions, etc. All memberships in any organisation, association, society, club, etc. shall be considered as a sponsorship.

All sponsorships & donations must be put in place in accordance with the relevant internal policies as well as the applicable laws and regulations. These initiatives must be transparent, approved and accurately recorded, shall satisfy one of ATR's strategic axes with respect to sponsorship and donations and shall be coherent with ATR's brand positioning.

ATR shall not participate in the financing of political parties or organizations and religious organisations, nor shall it provide goods, services or any kind of other advantage to such organisations or parties.



Key ATR Documents to Reference:

- **Sponsorship & Donation Directive**
- **Sponsorship & Donation Procedure**

STRIVING FOR ECO-EFFICIENCY

AS AN ENVIRONMENT-FRIENDLY ENTERPRISE ATR PROMOTES ECO-EFFICIENCY IN ALL OF OUR BUSINESS ACTIVITIES, ESPECIALLY BY STRIVING TO REDUCE THE ENVIRONMENTAL IMPACT OF THE DELIVERED PRODUCTS AND SERVICES.

In addition to complying with all applicable environmental laws, regulations and internal policies, ATR acknowledges that it has a responsibility to promote an environmentally-aware aviation industry.

We must ensure that at all times we make every effort to reduce our impact on the environment even when it involves small efforts such as turning off lights when leaving the office or printing only when necessary.



WHAT IS ECO-EFFICIENCY?

Eco-efficiency aims at maximising the benefits of the products and services we provide to our customers and other stakeholders, while minimising the environmental impact of these products throughout their life cycle.



Key ATR Documents to Reference:

- **ATR's Environmental Objectives**
- **2021 Environmental Vision**
- **ISO 14001 Certification**

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