



FL Technics Group of Companies

Code of Conduct

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Living Our Values



At FL Technics, our continued global growth is built on a clear principle – how we conduct our business is just as important as the outcomes we achieve. Integrity, accountability, and ethical behavior are fundamental to maintaining the trust of our colleagues, clients, and partners.

This Code of Conduct defines the professional and ethical standards expected from every member of the FL Technics team. It provides guidance for navigating complex situations, supports sound decision-making, and promotes a culture of compliance and responsibility throughout the organization.

Our values – competence, progress, ambition, and teamwork – are at the core of everything we do. They inform how we interact internally, how we collaborate externally, and how we maintain our reputation in the aviation industry.

The Code is not merely a list of rules – it represents a collective commitment to uphold the highest standards of conduct. All employees are expected to review and apply its principles in their daily work. If you observe behavior that does not align with the Code, we encourage you to report it – confidentially – through the anonymous reporting channels made available.

Upholding a culture of ethical behavior requires active participation from everyone. By following this Code and speaking up when necessary, we ensure FL Technics remains a trusted and responsible organization.

01 Introduction

At FL Technics Group of Companies, we are committed to maintaining the highest ethical standards in all aspects of our business. This Code of Conduct outlines the values, principles, and guidelines that govern how we conduct business, interact with each other, and engage with our partners, customers, and the broader community. Responsible and legally compliant behavior is central to who we are and how we operate. This commitment is the foundation upon which we build our daily activities, ensuring that all our actions reflect our dedication to ethical and transparent business practices.



02 Scope and Application

This Code applies to all employees, directors, contractors, and partners of FL Technics Group of Companies, including subsidiaries and affiliates. We expect everyone associated with FL Technics to follow the standards set forth in this Code and comply with applicable laws and regulations in every location where we operate. Additionally, all our suppliers and business partners are required to adhere to the principles outlined in our Supplier Code of Conduct.



03 Our Values

Our values define who we are and guide our behavior and actions:

- **Ambition:** Aiming high and acting proactively while staying flexible.
- **Progress:** Innovating through encouraging improvement, continuous professional and personal development, and helping others to grow.
- **Competence:** working collaboratively and sharing knowledge while showing respect and appreciation within teams, units, and subsidiaries.
- **Teamwork:** Having knowledge and the right skills to work successfully, sustainably and lean in the long run.



04 Ethical Business Practices

We are committed to conducting business in a fair, ethical, and transparent manner. This includes:

- **Compliance with Laws:** We strictly adhere to all laws, regulations, and international standards applicable in the aviation industry and the countries where we operate.
- **Anti-Corruption and Anti-Bribery:** We do not tolerate corruption or bribery in any form. We conduct business with integrity and ensure that decisions are based on merit and not influenced by personal gain.
- **Illegal Payments and Financing:** Employees and partners must not engage in illegal payments, including facilitation payments, or participate in any form of illegal financing, such as funding activities or organizations that promote unlawful behavior.
- **Gifts/Business Courtesies:** Employees are prohibited from offering or accepting gifts, hospitality, or any other courtesies that could create a conflict of interest or appear to influence business decisions. Exceptions must be reasonable, transparent, and follow company policy.
- **Fraud and Deception:** Fraudulent practices, including misrepresentation, falsification of documents, or other deceptive conduct, will not be tolerated. Any form of dishonesty that affects our business operations or reputation is strictly prohibited.
- **Fair Competition:** We believe in fair competition and follow all applicable antitrust and competition laws. We refrain from any practices that could unfairly limit competition or exploit market conditions.



05 Fair Labor Practices

We are dedicated to ensuring that all labor practices across our organization comply with international standards and local regulations:



- **Wage, Benefits, and Working Hours:** FL Technics complies with all applicable wage, benefits, and working hours laws. We ensure that employees are fairly compensated and receive all legally mandated benefits, including overtime, rest periods, and paid leave.
- **Social Dialogue and Freedom of Association:** We respect the right of employees to join or form labor unions and engage in collective bargaining. Open communication and dialogue between employees and management are encouraged to foster a positive work environment.
- **Harassment and Bullying:** We maintain a zero-tolerance policy toward harassment, bullying, or any form of abusive behavior in the workplace. All employees have the right to work in an environment free from discrimination, intimidation, and harm.
- **Prohibition of Child Labor:** FL Technics strictly prohibits the use of child labor in any of its operations or supply chains. We comply with all international standards and local laws regarding the minimum age of employment, ensuring that all employees meet the legal working age requirements.
- **Illegal Work:** FL Technics does not tolerate any form of illegal or unauthorized work practices. We are fully committed to complying with all local and international labor laws, ensuring that all employment relationships are lawful, ethical, and transparent.

06 Global Trade & Export Control

As an international business operating in the aviation industry, FL Technics Group of Companies is committed to complying with all applicable global trade, export control, and sanctions laws. These laws are crucial for regulating the transfer of goods, services, and technology across borders to ensure compliance with international security standards.



- **Export Control Compliance:** We follow all relevant export control laws, including those related to the export of dual-use goods, technology, and software. We ensure that our operations and transactions are fully compliant with national and international trade laws, including the laws of the European Union, the United States, and any other jurisdictions where we conduct business.
- **Sanctions Compliance:** We comply with all applicable sanctions laws, which may restrict business dealings with certain countries, entities, or individuals.
- **Customs Regulations:** We ensure that all imports and exports are fully compliant with local customs regulations.
- **Supplier Due Diligence:** We expect our suppliers to adhere to all applicable global trade and export control regulations.

We do not engage with or establish business relationships with partners involved in activities related to weapons of mass destruction, including nuclear, chemical, or biological weapons, or missile projects.

07 Commitment to Quality and Certifications

At FL Technics, our commitment to quality, security, environmental responsibility, and safety is foundational to our operations. We demonstrate our dedication to excellence through adherence to internationally recognized standards and maintenance of key certifications, including ISO 9001, ISO 27001, ISO 14001, and EN 9110. These certifications guide our practices across several crucial areas:



- **Quality Management (ISO 9001):** Our quality policy aligns with FL Technics' mission to lead the aviation MRO industry through reliable, high-standard services. We have established a framework for setting measurable quality objectives that support client satisfaction, operational excellence, and continual improvement. Our commitment to compliance ensures

we meet all applicable customer and regulatory requirements, while regular audits and feedback loops drive continuous enhancement of our Quality Management System (QMS).

- **Information Security Management (ISO 27001):** Protecting information assets is critical to our operations. Our information security policy includes objectives aimed at maintaining data confidentiality, integrity, and availability, supporting our reputation for reliability and trustworthiness. We comply with all relevant legal, regulatory, and contractual requirements for data security and are committed to the ongoing improvement of our Information Security Management System (ISMS) through regular risk assessments and updates to address emerging threats.
- **Environmental Management (ISO 14001):** We are committed to responsible environmental stewardship in all areas of our business. Our environmental policy includes objectives to reduce our environmental impact, such as lowering emissions, conserving resources, and preventing pollution. We comply with all applicable environmental regulations, aiming for sustainable resource use and climate change mitigation. We continuously improve our Environmental Management System (EMS) by assessing our practices and setting new goals to support our sustainability objectives.
- **Aerospace Maintenance Quality (EN 9110):** As an aviation maintenance organization, we adhere to the EN 9110 standard, ensuring our quality policy aligns with the specific regulatory and safety requirements of the aerospace industry. We set objectives to enhance maintenance accuracy, improve on-time delivery, and uphold the highest standards of safety and reliability. Continuous improvement of our QMS is achieved through regular process evaluations, error tracking, and alignment with updated aviation regulations, ensuring our maintenance services consistently meet stringent industry expectations.
- **Top Employer Certificate:** We are proud to be recognized as a Top Employer, reflecting our dedication to fostering a high-quality work environment, supporting professional growth, and maintaining best-in-class HR practices.

These certified standards are implemented through documented policies and procedures that are communicated throughout the organization and made available to relevant stakeholders to ensure transparency and foster a shared commitment to quality, security, environmental sustainability, and safety. By maintaining these certifications, FL Technics reinforces its dedication to operational excellence and its role as a trusted leader in the aviation MRO sector.

08 Safety, Health, Diversity, and Well-being

Safety, health, and a commitment to diversity and inclusion are paramount to FL Technics:

- **Safety First:** We prioritize the safety of our employees, customers, and the public in all operations and decisions.
- **Health and Safety:** We are committed to providing a safe and healthy workplace by complying with all relevant regulations. This includes organizing regular training and implementing safety protocols to prevent workplace incidents and ensure the well-being of all employees.
- **Diversity, Equity, and Inclusion (DEI):** We believe in fostering a diverse and inclusive workplace where everyone feels valued and respected. We promote diversity in our workforce and strive to create an inclusive environment.
- **Mental Health Support:** We recognize the importance of mental health in the workplace and are committed to supporting the well-being of our employees by providing access to mental health resources, including employee assistance programs and wellness initiatives. We promote a healthy work-life balance.



09 Integrity in the Workplace

We strive to create a work environment based on respect, fairness, and integrity:

- **Respect for Colleagues:** We foster an inclusive work environment where all employees are treated with respect.
- **Confidentiality:** We protect the confidentiality of company information and employee data, ensuring it is only accessed by authorized personnel for legitimate business purposes.



10 Environmental Responsibility

We are committed to minimizing our environmental impact:

- **Sustainable Practices:** We continuously seek ways to reduce our environmental footprint through efficient resource management and sustainable practices.
- **Compliance with Environmental Laws:** We comply with all relevant environmental regulations and standards, committing to the highest environmental stewardship in our operations.
- **Climate Change Mitigation:** We acknowledge the importance of addressing climate change and will work to minimize our relative greenhouse gas emissions. We commit to set targets to minimize our carbon footprint, promote energy efficiency, and explore renewable energy sources.
- **Energy Efficiency:** We are committed to promote the efficient use of natural resources, including energy throughout our operations.
- **Waste Management:** We prioritize waste reduction, recycling, and responsible disposal practices. We actively seek to minimize waste generation and promote circular economy principles in our operations.



11 Social Responsibility

At FL Technics, we believe that corporate success goes hand in hand with social responsibility. We are committed to making a positive impact on the communities in which we operate by actively supporting initiatives that align with our mission, vision, and values.

- **Promoting Aviation & Education:** We collaborate with educational institutions to inspire and develop the next generation of aviation professionals.
- **Community Support:** We provide financial support for local social initiatives, events, and projects that contribute to societal well-being.
- **Sustainability & Ethics:** We promote responsible business practices that foster a sustainable and ethical working environment.
- **UN Global Compact:** We are proud to be a member of the United Nations Global Compact, aligning our operations and strategies with its ten principles to advance human rights, environmental sustainability, and anti-corruption effort.

Through these efforts, we reinforce our dedication to being a responsible corporate citizen and a leader in the aviation industry.



12 Conflict of Interest

We expect employees to avoid situations where personal interests could conflict with the interests of FL Technics:

- **Disclosure of Conflicts:** Employees must disclose any actual or potential conflicts of interest that may arise in their professional duties.
- **Avoiding Conflicts:** Employees should not engage in activities that could harm the interests of the company or impair their ability to perform their duties impartially.



13 Conflict Resolution

We are committed to addressing grievances and disputes fairly and transparently, providing a clear process for employees to voice concerns.



14 Training and Development

We recognize the importance of continuous learning and development for our employees and suppliers, offering training programs and resources to enhance skills and knowledge relevant to our operations.



15 Whistleblower Protections and Reporting Mechanisms

We encourage open communication and the reporting of any suspected violations of this Code of Conduct. We provide confidential channels for reporting concerns:

- **Whistleblower Protection:** Employees who report misconduct in good faith will not be subject to retaliation.
- **Reporting Channel:** Concerns can be reported through our secure reporting platform at TrustLine.



16 Personal Data Protection and Privacy

At FL Technics, we recognize the importance of protecting personal data and privacy. We are committed to ensuring compliance with all relevant data protection laws, including the General Data Protection Regulation (GDPR), and any applicable local privacy laws.



- **Data Handling:** Personal data must be collected, processed, and stored in a lawful, transparent, and secure manner. Employees are expected to handle personal data responsibly and only for legitimate business purposes.
- **Confidentiality:** We ensure that sensitive information, including employee and customer data, is kept confidential and protected against unauthorized access, disclosure, or misuse.
- **Security Measures:** We implement appropriate technical and organizational security measures to safeguard personal data.
- **Reporting Breaches:** Any suspected data breach must be reported immediately to the designated data protection officer for prompt action.

17 Audits and Compliance Monitoring

FL Technics Group of Companies reserves the right to conduct audits of our partners, including customers, suppliers, and other third-party affiliates, to ensure compliance with the principles outlined in this Code of Conduct. These audits are essential in verifying that all parties we engage with uphold the same ethical, legal, and quality standards that guide our operations.



- **Audit Rights:** We may conduct periodic audits to assess compliance with applicable laws and this Code of Conduct.
- **Consequences of Non-Compliance:** If any material findings or reasonable doubts regarding non-compliance are identified during an audit, FL Technics Group of Companies reserves the right to unilaterally suspend or terminate the performance of any agreements until such issues are resolved. Continued non-compliance may result in permanent termination of the partnership or contractual relationship.

18 Reporting Violations

All employees and partners are encouraged to report any suspected violations of this Code of Conduct. Reports should be made to the immediate supervisor, the Human Resources Department, or through the established whistleblower channels. We take all reports seriously and will investigate them promptly and confidentially. Any employee found to have violated this Code will face disciplinary action, which may include termination.



19 Waivers to the Code of Conduct

FL Technics Group of Companies may consider granting specific waivers to certain provisions of this Code of Conduct, provided such waivers do not permit any violation of applicable law. Requests for a waiver should be submitted to the Legal Department and must receive approval from the Group General Counsel or an authorized designee.

For executive officers or members of the Board of Directors of FL Technics Group of Companies, waiver requests must be submitted to the Chair of the Audit and Compliance Committee of the Board and will require full Board approval. Any approved waivers for such individuals will be promptly disclosed in accordance with company policy.



20 Conclusion

The FL Technics Code of Conduct is an essential part of our commitment to ethical business practices. Each employee and partner has a responsibility to uphold these standards and contribute to our culture of integrity, respect, and compliance.



Effective as of 8 July 2025

Approved under the order No FLT-IS-25-32 of UAB FL Technics CEO, dated 08-07-2025

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