

Reference	Update	Validation
MO-1-01	21/12/2023	Management

Preamble

The Charter of Ethics defines principles and values to which TITAN AERO GROUP and all its Subsidiaries subscribe, and which must guide each Group Employee in the daily practice of his/her job.

It is in effect in all Group's subsidiaries:

TITAN AERO GROUP	France
TITAN AERO	France
REDS	France
ALL4JET	France
TITAN DEFENSE	Belgium
TITAN ALGERIA	Algeria
TITAN REFUELLING SOLUTIONS	United Kingdom
TITAN ASIA	India

In the future of this Charter, the term "Group" refers to TITAN AERO GROUP and all of its Subsidiaries.

Integrity, ethics, social responsibility, loyalty, respect for the person, transparency, fight against corruption and unfair competition are fundamental values of the Group in the conduct of business and its activities.

This Charter applies to all Group employees (corporate agents, directors, executives, employees, etc...) as well as all persons to whom the Group is associated such as its clients, suppliers, councils, auditors, consultants, subcontractors, agents and other intermediaries.

The principles outlined in this Charter encourage the Group to conduct business and do the work in a way that upholds and strengthens the trust of its customers and stakeholders.

Each Employee, regardless of his (or her) hierarchical level, must apply, within the limits of his (or her) duties and responsibilities; the following rules which are part of a fair and good faith performance of his (or her) employment contract or social mandate, and to ensure that these are also applied within his (or her) team or by the persons under his (or her) responsibility.

Employees who do not respect principles of this Charter, or laws and regulations in applicable in the country of their connecting legal entity, are subject to disciplinary action in accordance with internal regulations and/or legal provisions.

This Charter is available on the Group's website (www.titan-aero-group.com) and on the Group's intranet. It can be addressed to any third party who requests it written to the Compliance Officer (a function performed by the Chief Financial Officer of the Group) by email to compliance@titan-aero-group.com or by mail at the following address:

TITAN AERO GROUP
Compliance Officer
170 Rue Clement Street - ZI Nord
69400 Arnas - France

1. COMPLIANCE WITH LEGISLATION

The Group is committed to complying with the laws and regulations in which it operates.

Respect for the first is an inescapable value. It is the responsibility of all Employees to fully know and comply with applicable laws and regulations, as well as various policies and guidelines established by the Group in its various areas of activity.

All Employees are required to inquire about the Group's provisions regarding their area of responsibility, to observe them and to consult, if in doubt and need, the relevant services for further information and advice.

2. FAIR COMPETITION

The Group ensures that competition rules are respected in order to ensure that competition is fair and fair. No action by the Group should prevent, restrict or distort competition.

Thus, the Group rejects all unfair competitive and commercial practices, including any agreement with competitors or any concerted practice relating to financial conditions or the distribution of services, markets, or customers.

All formal agreements, concerted practices and any informal discussion resulting in or aiming to result in the restriction of free or fair competition are prohibited.

Thus, commercial, and financial conditions are established independently, and the Group's customers must make their decisions freely.

3. RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS AND OTHER BUSINESS PARTNERS

The Group maintains honesty and fairness with all its stakeholders and, in particular, with its customers, suppliers and other business partners, in accordance with its ethical principles listed previously.

As a result, the Group is obliged to honor its contractual commitments and to respect its trade agreements.

Employees must ensure that they act with professionalism, integrity, and fairness in order to encourage clients to use the Group's services. Commercial action, both in France and internationally, is carried out in accordance with local regulations, which every Employee applies to know. In particular, the Group respects the specific rules governing private and public procurement, regardless of the country in which it operates.

The Group strives to select its suppliers and suppliers on the basis of non-exhaustive criteria of quality, technical performance, cost, compliance with environmental standards and suitability for its needs. It expects its partners to have an equivalent commitment in terms of respect for human rights, respect for the environment, loyalty of sales and marketing practices, protection of confidential information and intellectual property, anti-corruption and, more broadly, business ethics.

It is the responsibility of each Employee to select its partners on an objective basis, without favoritism or discrimination, by applying a rigorous selection process.

It may be necessary to use external business partners (e.g. business providers or subcontractors) as part of a contract to supply equipment or provide services. Any employee using a business partner must ensure that appropriate audits are implemented and that the trading partner is committed to complying with the requirements of that Charter before a business relationship is entered into.

The products and services provided by the Group meet the standards established in terms of Quality, Health, Safety, and Environment on its own sites and those of its customers and partners.

4. ANTI-CORRUPTION

The Group is committed to combating corruption, influence peddling, concussion, illegal taking of interest, embezzlement of public funds, favoritism, or any other breach of probity in the countries in which it operates.

It enforces national and international anti-corruption laws in all countries where it operates, including:

- For France, the French anti-corruption law 2016-1691 of 9 December 2016 on transparency, the fight against corruption and the modernization of economic life (known as the Sapin 2 law);
- For India, the Corrupt Practices Act of 1988;
- For Algeria, the Law 06-01 of 20 February 2006 on the prevention and fight against corruption;
- For the United Kingdom, the UK Bribery Act 2010 (UKBA).

In this spirit, “zero tolerance” refers to corruption and no Group Employee may engage in any act of corruption or similar practices. Thus, it is forbidden to accept or offer, to offer, to authorize or promise any form of “bribe”, gift, gratification, invitation, ease of payment or any other form of influence on a person (public or private), or to encourage illegal practices.

No gift or entertainment shall be offered or accepted by a Employee or relative unless it is in accordance with customary professional practices, its value is not excessive, that this offer does not constitute a form of “bribe” and that it does not violate any law or regulation. The offer of cash or equivalent is not allowed.

5. CONFLICTS OF INTERETS

The Group's business decisions are made objectively, without any personal consideration.

Any activity or mission of the Group's Employees and governing bodies (Management Committee, Board of Directors, etc.) that goes against the Group's interests is prohibited.

A conflict of interest arises when, for example, an Employee or relative is able to influence a Group decision that may confer a personal benefit or favor a relative or relative.

Employees must identify the risks of conflict of interest, disclose them to their supervisor or management and act, in all circumstances, in the best interests of the Group. For the sake of integrity, they must also refrain from any action that could cause a real or potential conflict of interest. His position within the Group should not be used for direct or indirect personal gain. In the face of a conflict of interest, the Employee must not take part in the decision concerned.

6. CONFIDENTIALITY

The Group strives to enforce the confidentiality of its contracts, the confidentiality of data, information, know-how, intellectual and industrial property rights, and trade secrets, in connection with its activities. All Employees are required to keep confidential information about the Group, its customers, suppliers, and Employees for themselves. This obligation remains even after they leave the Group.

If their unauthorized disclosure may harm the Group, all confidential information must be kept and kept confidential, unless it has been the subject of an authorized public release.

Thus, each Employee must:

- Limit the disclosure of confidential information to only those with a legitimate need to know about it;
- To keep secure, regardless of their format (paper or electronic), all confidential data relating to the activities of the Group and the companies with which it has business relationships;
- Prevent disclosure of confidential information to persons outside the Group (including family members).

7. SINCERITY OF ACCOUNTING AND FINANCIAL INFORMATION

The Group is committed to providing its third parties and partners with accurate, transparent, and regular information. The sincerity of the accounts allows the Group to base its decisions on comprehensive, accurate and reliable information.

The Group and its Employees are obliged to produce regular and sincere accounts giving a true picture of the Financial Situation, The Results of Operations, Transactions, Assets and Liabilities of the Group. The establishment of these documents is consistent with accounting principles with entries justified by appropriate documents issued by parties in good faith.

All documents are kept in accordance with applicable laws and group policies.

Any transfer of funds requires special vigilance, including the identity of the recipient and the reason for the transfer.

8. INFORMATION SYSTEMS

Employees must comply with the Group's IT Charter.

IT systems, i.e. hardware, software, networks, and information contained in them, are a key factor in the Group's success and must be used responsibly and only for legitimate purposes.

Emails should be written with the same care as any other written communication. In particular, it is prohibited for Employees to use the Group's computer systems to consult, save or send web pages or messages with illegal or defamatory content.

The personal use of the Group's Information Systems, such as sending e-mails to third parties, must be kept to a minimum and must never involve the installation of equipment or software that does not comply with the Group's computer standards or infringes the copyrights of third parties.

9. PROTECTING THE COMPANY'S ASSETS

The Group expects its Employees to responsibly manage the Group's assets and make business decisions based on transparent risk-benefit analyses.

Assets, both tangible and intangible, include patents, trademarks, methods and know-how, client lists, subcontractors or suppliers, market information, technical or business practices, commercial offers, and technical studies, and more generally all data or information that Employees have access to in the course of their duties.

Employees are not permitted to use the Group's assets for personal, illegal or unrelated purposes. The effects made available to the Employees as part of their function and the in-kind benefits granted in accordance with the current regulations are not concerned.

Similarly, the name of the Group and its Subsidiaries cannot be used by an Employee for personal purposes, including on social networks or on the Internet. Under no circumstances can he speak on behalf of and on behalf of the Group if he has not been expressly authorized by the Directorate.

10. RESPECT FOR PEOPLE - HEALTH AND SAFETY IN THE WORKPLACE

The management of human resources, the animation of the Employees, as well as the relations between the Employees, are based on the principles of mutual trust and respect, with the concern to treat everyone with dignity.

The Group intends to implement a fair and compliant human resources management. In particular, it prohibits discrimination.

Thus, the Group guarantees its Employees and its stakeholders a working environment that excludes discrimination on the basis of gender, sexual orientation, ethnic origin or religion, the status of staff representative, the exercise of a trade union mandate, political opinions, disability, age and any other offensive physical, verbal, or visual behavior. All forms of harassment are prohibited and punished in accordance with current laws.

Each Employee must respect the safety, rights, and opinions of their colleagues, as well as their cultural or specific characteristics. Any moral or sexual pressure, prosecution or harassment is strictly prohibited.

Each Employee has the right to privacy, especially through computer data regulations.

In addition, ensuring and strengthening the safety of the Employees in the performance of their activities is an ongoing concern of the Directorate, which wishes to guarantee adequate working conditions for its Employees, who have a duty to contribute to them by respecting internal and external rules on occupational health and safety.

The Group does not use any form of forced labor and in accordance with international conventions, it formally prohibits clandestine and child labor.

It has an active disability policy, including encouraging the employment and integration of employees with disabilities and accompanying those who wish to do so in the event of a disability during their working life.

11. ENVIRONMENTAL AND SOCIETAL RESPONSIBILITY

The Group is committed to preserving natural and energy resources, reducing the production of waste and harmful discharges into the air or water, and combating climate change. This necessarily means complying with the existing environmental protection provisions.

Thus, the Group has made concrete commitments and established a CSR Charter to which it is appropriate to refer.

12. COMMUNICATION WITH THIRD PARTIES

All communication with external interlocutors must be accurate and in accordance with regulatory and legal obligations.

In order to ensure consistency, veracity of communications and compliance with legal requirements, only Employees specifically authorized by the Directorate can make statements and respond to requests for information from third parties.

Employees are strictly prohibited from creating pages or accounts in the Group's name on the Internet, from using the Group's logos and from speaking on behalf of and on behalf of the Group without being expressly authorized by the Management.

13. IMPLEMENTATION

All Employees of the Group are required to behave in accordance to this Ethical Charter.

Executive Managers and Managers are given a special role in this regard, that of setting an example. As interlocutors, they answer all questions about the principles of conduct and ensure that the Employees are sufficiently informed about the Group's values, especially in their area of responsibility.

Each Co-worker may contact the Compliance Officer for any questions relating to this Charter or any request for a waiver that they deem appropriate, by email to compliance@titan-aero-group.com or mail at the following postal address:

TITAN AERO GROUP
Compliance Officer
170 Rue Clement Street - ZI Nord
69400 Arnas - France

It is up to each Employee to communicate without delay, to his (or her) Manager any legal infringement or any breach of the Group's rules brought to his (or her) knowledge. These communications must be in good faith and properly documented. All notifications of alleged violations will be treated with the utmost seriousness and confidentiality, particularly in the context of the reporting procedure described below. The perpetrators of these communications will not be subject to any retaliation or threat, harassment and their identity will be kept secret within the limits permitted by law.

Our business partners will be informed of this Code of Ethics. They also must behave in a fair, honest, and loyal manner in accordance with principles described, lest they cease dealings with the Group.

14. WHISTLE-BLOWING PROCEDURE

The Group encourages its Employees to express their views, defend their opinions and report unacceptable behavior or requests.

The normal way to raise such concerns is direct or indirect hierarchy. Nevertheless, any Employee who considers that information to the line manager may present difficulties or not give rise to the appropriate follow-up, has the opportunity to refer directly to the Compliance Officer.

In this context, the person who reports must provide the facts, information, or documents, whatever their form or support, to support his (or her) reporting. He also communicates his contact information (identity, phone, email, ...) allowing, if necessary, an exchange with the Compliance Referee and the processing of his report.

During verification operations, principle of confidentiality and presumption of innocence will be respected. The identity of the perpetrator, the facts and the persons involved in the report is guaranteed to be strictly confidential.

Any investigation will also take place in accordance with local law and practice.

During this investigation, everyone will be required to cooperate fully and provide, at the first request, any information, and documents.

The person involved will be informed of the nature of the allegations concerning him but will not be informed of the identity of the person who made the report. Information may not be immediate if it is necessary, for example, to verify the facts, preserve evidence or refer the matter to the relevant authorities.

Any information provided will only be shared with those who know about it to ensure that the report is processed and/or appropriate action is taken. These individuals will also be bound by a duty of confidentiality.

Subsequently, the whistleblower, as well as those affected by the report, will be informed in writing of the closure of the audit operations and the admissibility of the report.

It is recalled that the whole of this alert device is optional. No sanctions or consequences will be taken against an Employee who has not used it.

Nevertheless, this procedure must be used in good faith and for the only purpose it frames. Any non-compliant use may be sanctioned by the Company and may result in legal action.

15. SANCTIONS

The various principles of this Ethical Charter are binding insofar as their non-compliance is punishable by disciplinary sanctions as stipulated in the Internal Regulations of the various subsidiaries of the Group up to the breaking of the employment contract, in accordance with the local legislation in force, regardless of possible civil and criminal proceedings that could be brought in relation to the offences found.

16. ENTER INTO FORCE AND AMENDMENTS OF THE CHARTER OF ETHICS

This Charter of Ethics is an addition to the Internal Regulations of the Group's French subsidiaries and is therefore enforceable against the employees of these companies.

It is subject to change to accommodate legal and regulatory changes.

It replaces any previous version and comes into effect on the 1st of April 2021.