

# **CODE OF CONDUCT - 2021 -**

**FÁBRICA ARGENTINA DE AVIONES  
“BRIG. SAN MARTÍN” S.A.**





## CONTENTS

A message from the Board of Directors _____	<b>03</b>
What is the Code of Conduct? _____	<b>04</b>
What goals does the Code of Conduct have? _____	<b>04</b>
Our values _____	<b>05</b>
Applicability _____	<b>05</b>
Internal conduct _____	<b>06</b>
Company Assets _____	<b>07</b>
Limited privacy expectation _____	<b>07</b>
Conflict of Interests – prevention and management _____	<b>08</b>
Bribes and corruption _____	<b>10</b>
Gifts, gratuities and business courtesies _____	<b>10</b>
Information treatment _____	<b>12</b>
Confidentiality _____	<b>13</b>
Health and labor protection _____	<b>15</b>
Environment protection _____	<b>17</b>
Treatment of customers and suppliers _____	<b>17</b>
Ethics guidance _____	<b>18</b>
Ethics line ¿How can I report a violation to the Code of Conduct? _____	<b>18</b>
Reportable events _____	<b>19</b>
Non-reportable events using this code _____	<b>19</b>
Ethics line ¿How can I ask for guidance regarding our Code of Conduct? _____	<b>19</b>
ANNEX I – CODE OF CONDUCT RECEPTION FORM _____	<b>20</b>



## A message from the Board of Directors

Fábrica Argentina de Aviones “Brig. San Martín” S.A., hereinafter “FAdeA” or the “Company”, has a policy of conducting its commercial, business and internal activities through ethics, integrity and transparency standards, following the values chosen by the Company for its Code of Conduct, applying the laws and regulations in force.

Respect for ethic values, notwithstanding our diverse backgrounds, tasks and responsibilities, determines how we perform, how we make decisions and how we behave. Habits build culture, thus every task must be based on such values.

Regardless our position in the Company, we are all responsible for our way to relate to one another and to work. Ethics is an essential component of our performance, and it is not only important to reach our goals, but how we achieve them and the means we use to do so.

We commit ourselves to a transparent management, guided by honesty, professionalism, teamwork, accountability and respect. In this sense, we are looking after the good conduct of all of FAdeA’s members.

Through our Code of Conduct we are looking forward to providing guidance to our employees, business partners and third parties related to FAdeA, and the manner in which sound relationships should occur. Our Code is the guide that must accompany us in our daily occupations, without exception.

We are convinced that abiding by these clear and transparent rules shall set the basis to guarantee our harmonious coexistence. We hereby invite you to implement them and work through them together.

We count on your cooperation to make FAdeA a company of excellence.

**The Board of Directors**

## What is the Code of Conduct?

Our Code of Conduct is the **instrument** that establishes our Company ethical values and the general and particular guidelines to apply on individual conduct and relations, either personal or professional in the Company's work environment, including relations to third parties such as customers, suppliers, etc., that are connected to FAdeA in any way.

The Code of Conduct is mainly based on the **Public Office Ethics Act** (Act 25.188), **Access to Public Information Act** (Act 27.275), **Criminal Liability for Companies** (Act 27.401), **Gift policies for public officials** (EO 1179/2016), and **Conflict of interests regulations** (EO 202/2017), among others.

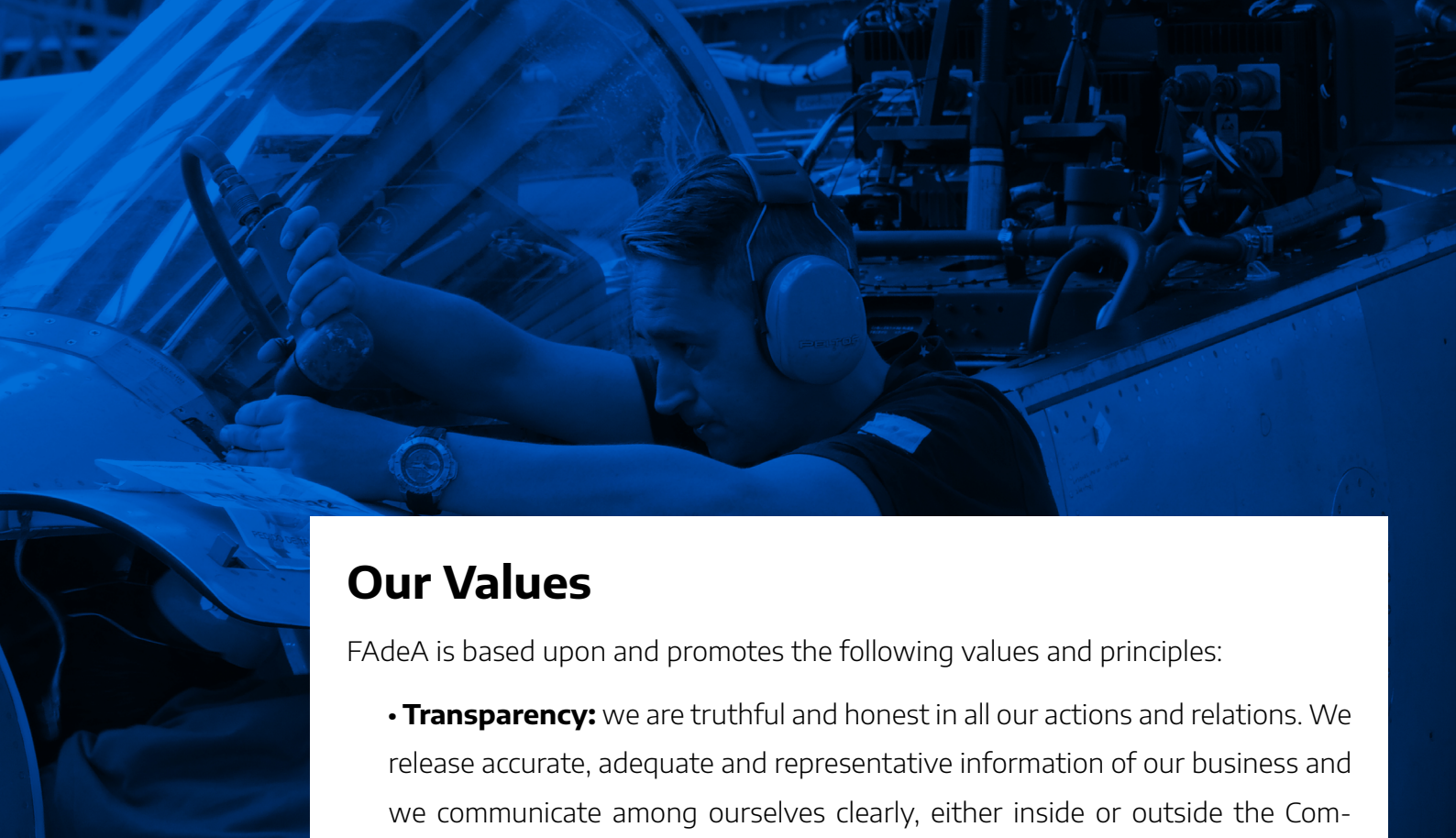
## What goals does the Code of Conduct have?

The main goals for FAdeA's Code of Conduct are:

- To become an instrument of reference regarding ethical behavior of any person related to FAdeA.
- To promote its values and foster a culture of Ethics as part of FAdeA's Integrity Program.
- To prevent crimes of corruption and others.
- To provide orientation and guidance to minimize personal interpretations about how to act in certain circumstances.
- To strengthen FAdeA's image and its commitment with Ethics and public transparency.

In summary, our Code of Conduct is **our compass to be clear on what to do**, how to do it and how to relate among ourselves and to third parties, while we abide by the law and applicable standards.





## Our Values

FAdeA is based upon and promotes the following values and principles:

- **Transparency:** we are truthful and honest in all our actions and relations. We release accurate, adequate and representative information of our business and we communicate among ourselves clearly, either inside or outside the Company.
- **Integrity:** we uphold irreproachable behavior, aligned with correctness and honesty. We promote coherence between corporate practices and ethical values.
- **Accountability:** we take charge and act accordingly in our actions, devoting all our capacities to reach targeted goals. We intend to be efficient using less resources to accomplish the same objectives.
- **Respect:** this implies treating one another with dignity and fairness. We value the diversity of our employees and what makes each individual that works for FAdeA unique. We are dutiful respecting equal opportunities, and not making differences due to gender, race, religious or political beliefs.
- **Sustainability:** we strive to provide value to our customer and to offer the best product conditions or services to satisfy customers' needs at a competitive price. We carry out our activities sustainably and environment oriented.
- **Equal opportunities and treatment:** FAdeA aims at guaranteeing the same possibilities to access a job and respectful treatment for all of its employees, making sure that our decisions are free of biases regarding gender, race, religious or political beliefs.

## Applicability

This Code of Conduct is applicable to all of FAdeA's employees, notwithstanding their position, category or type of contract, to its suppliers, contractors, customers and any other third party who is legally related to FAdeA.



## Internal conduct

The conduct of FAdeA's employees shall be consistent with the Company values and shall abide by the legal standards in force; otherwise, non-compliant behavior shall be punishable.

Company employees in higher positions, such as chiefs or managers shall become a model of conduct, in accordance with this Code of Conduct, fostering the employees in their teams to act likewise.

It is most important to uphold cooperation and information exchange between role models and people in their charge, so that the performance of daily tasks occurs under a good work environment that will turn into satisfactory results.

All of FAdeA's members, regardless their position, shall observe our duties of cooperation, loyalty, compliance with work instructions, and any other behavior resulting from the fulfilment of our job and applicable standards.



## Company assets

We shall use the Company assets, or customers' or suppliers' when applicable, diligently, reasonably and in good faith, avoiding waste, theft, loss or misuse.

The resources and assets the Company provides to perform our work are and remain the sole property of FAdeA's.

All of FAdeA's employees are responsible for the care and order of both material and immaterial assets, including but not limited to resources used to perform the tasks assigned to each job position. Also, such assets and resources shall not be removed from the Company without previous authorization from the applicable area chief or appointed person.

It is mandatory for all of FAdeA's employees to observe the standards and instructions regarding use of, access to, software security, information technologies, e-mail use, internet and intranet.

## Limited privacy expectation

Regarding use of some assets or resources that the Company provides us for the performance of our jobs, we only have moderate privacy expectation. This means that the Company:

- May review the contents of Company mails and shared folders contents.
- May access the log of events regarding Internet used and call records for provided telephones.
- Uses video surveillance to care for the safety of individuals and company assets.



## Conflict of Interests – Prevention and management

There is a “Conflict of Interests” situation when the private interests (personal, economic, family related) of a member of the Company, regardless of his/her hierarchy or position, interferes with the Company’s interests. In such cases, we shall always make FAdeA’s interests prevail.

We shall avoid any relation, influence or activity that may affect our capacity of making objective and fair decisions while performing our duties.

We shall not use Company sensitive information to obtain personal benefits nor take any advantage of opportunities available due to the position we have.

We must report any situation that implies or may imply a conflict of interests to our own chief and the Ethics Office or Legal Affairs.

As members of FAdeA, we have the obligation of informing in writing whether we have another job, or a position as manager or director in another Company or business that may be a direct competitor or that may be in the same business than FAdeA; also, if we have any relationship, either economic, commercial, of kin or friendship with other companies or people who maintain a business relation with FAdeA, or have received a proposal from FAdeA, which might impair the objectivity in our decisions towards third parties, thus representing a conflict of interests with the Company.

Conflicts of interests extend towards relatives to the second degree of blood relationship to all of FAdeA’s employees. Thus, FAdeA’s members that may have a situation as described above, shall have the obligation of reporting it.

The following are possible situations that may cause a conflict of interests:

- A competitor hires a FAdeA’s employee, regardless his/her position.
- Requests for leave of absence of any kind to work for a FAdeA’s competitor, supplier or customer.
- Accepting gifts, money or services from people who want to do business with FAdeA.
- Hiring a company owned or managed by a director / employee or a family member in charge of such hiring process.
- Holding substantial interests in a company that is FAdeA’s competitor, su-



ppplier, or customer.

- Acting as a consultant for FAdeA's competitors or suppliers.
- Holding a particular or potential interest in obtaining benefits from any of FAdeA's transactions.

In case any of above situations is noticed, we shall immediately report them to the Ethics Office or Legal Affairs, and to our chief, unless he/she is part of the conflict.

Also, in case we may have doubts regarding a potential conflict of interests, we must make the request for guidance to the Ethics Office or Legal Affairs Division.

In case two or more relatives work in FAdeA, their relation shall not affect the performance of their work, for this, it is not appropriate that the following occur among family members:

- Work relation where there is direct process interactions among family members.
- Boss-employee relation.
- If one of the family members holds a chief, manager or director position, their relative shall not work in the same area or department.

All employees holding a position as chief or manager are responsible for monitoring and analyzing situations to prevent possible conflicts and act timely.

Family members of any of FAdeA's employees who are customers, suppliers, and or competitors shall report this circumstance to the Ethics Office or Legal Affairs. Not doing so, may result in punishment due to non-compliance, of various degrees, including termination.

## Bribes and corruption

It is expected that all of FAdeA's members act honestly and uprightly regarding work and business relations, both in the Company and outside.

FAdeA has **zero tolerance** to corrupt practices and bribery.

Any activity tending to obtain or offer advantages or favors from public officials, Company representatives, public official relatives or other people or companies is **forbidden**.

FAdeA's members shall not request, accept, or offer, either directly or indirectly, sums of money or other goods; or accept gifts, or offer them to: suppliers, contractors, or third parties seeking a decision from FAdeA.

It is our obligation to immediately **report** any such event to the Ethics Office or to Legal Affairs.

## Gifts, gratuities and business courtesies

None of FAdeA's members, regardless of their standing or position, shall offer or accept business courtesies that are or maybe inferred as unfair business incentives, that may break the law, regulations or Company's or customer's policies, or that may affect the Company's reputation.

It is acceptable that FAdeA's employees offer meals, refreshments, entertainment and other business courtesies of a reasonable value to third parties, in order to provide support to business activities, on condition that this action does not break any law or regulation, or conduct standards of the receiver of such courtesy. It is our responsibility to know about the prohibitions or limitations of the receiving organization before we offer any business courtesy.

It is forbidden to all members of FAdeA, regardless of their standing or position, to offer or to give tangible gifts to the following individuals, governments or companies that:

- Perform activities regulated or controlled by FAdeA;
- Are our contractors;
- Are our concessionaires or suppliers;
- Intend to obtain a decision from FAdeA;
- Have interests that maybe affected by a decision (or by a delay or omission of such decision) by FAdeA.

The only exception to this prohibition are the gifts offered during public events, public official activities or visits (as long as it is a reasonable situation).

As members of FAdeA's we may occasionally accept unsolicited meals, refreshments, entertainment and other business courtesies, on condition that:

- Such acceptance fosters good will and successful business relations.
- Such courtesies are not extravagant or luxury items for the given circumstances.
- Such courtesies are not frequent or reflect a routine of frequent acceptance or its appearance as a routine of frequent acceptance granted by the same companies or individuals.
- The employee that accepts such courtesies may feel uncomfortable if he/she had to discuss them with their bosses or colleagues, or make them publicly known.

No member of FAdeA may, regardless of their standing or position, accept salaries, fees, funds or money instruments of any kind and quantity. They cannot accept any tangible gift, from any Company or its representatives, or individual that is currently doing or intends to business with FAdeA.

Requesting for gifts is always forbidden.

In case of doubt regarding the adequacy of offering or receiving any gift, courtesy or valuable item, we should ask the Ethics Office or the Legal Affairs Division.

For **Purchasing employees** (or equivalent), or any other company area in charge of or involved in acquiring products for FAdeA, we must be objective and provide equal conditions to all suppliers. For this reason, we cannot accept gifts from suppliers, with the exception of advertising items of low value, such as pens, cups, keychains, caps, or such articles exhibiting the logo of the customer or supplier.

## Information treatment

We must keep our Company records complete and adequately registered. For this, we need to record transactions between the Company and other parties accurately, in compliance with professional accounting standards in force both from the Nation and the province of Córdoba.

In order to protect the stakeholders and customers' interests, the Company commits to adopting good practices to attain levels of excellency in financial planning and control, such as adequate accounting systems that abide by accounting principles and standards, to reach the maximum transparency as possible.

Also, employees in charge of preparing business proposals and / or quotes, shall be diligent when handling information related to quotes and bids, and will make their best effort in protecting FAdA's interests and will abide by the company standards about handling sensitive Company information.





## Confidentiality

All of FAdA's employees, notwithstanding their standing or position, shall abide by the following restrictions regarding information and technology obtained or developed, resulting from the work relations with FAdA, during and after they are extinguished.

We need to maintain confidentiality regarding any of FAdA's proprietary information. We cannot share it, either directly or indirectly to third parties, or copy, use, publish or remove it from the Company, except that such release is required to fulfill our obligations to the Company during our work relation as employees, managers or directors.

For the purposes of this Code, any information or idea, either tangible or intangible, related to the Company, its customers, suppliers and employees as we may have knowledge of, is considered Confidential.

**Any data belonging to customers, suppliers and employees held by the Company, are protected under Act 25.326 and the strictest secrecy and confidentiality applies to them, for this, they shall not be shared partially or as a whole without prior approval.**

**E-mail addresses provided by the Company shall be used solely for business reasons. The use of such e-mail address for receiving or sending offensive, abusive, obscene or discriminatory material shall constitute a serious violation to this Code of Conduct.**

It is prohibited to share users or passwords for mail boxes or information systems as provided by FAdA. User names and passwords are private, confidential and non-transferrable.

It is prohibited to take photographs or film aircraft or products that are maintained or manufactured in the Company, and also to disclose such images, either internally or externally.

To record images (photographs or videos) and disclose them via cell phones or other means, using social networks such as WhatsApp, Instagram, Facebook,

among others, constitutes a violation to this instruction and shall be liable of severe punishment.

**Prohibitions related to the recording of images (in video or photographs), and their disclosure or release, shall not be applicable when the images are recorded and/or disclosed by the Company, by authorized personnel and through the official means of communication (internal mailing, official social networks, official webpage, etc.).**

**In the same manner, such prohibitions will not apply to publications (from the press or other), that use images previously disclosed by FAdeA, or copyrighted by third parties (for example, photo journalists), with prior written authorization from FAdeA.**

In order to preserve confidential information we shall keep such information in guarded and safe spaces, not leaving it in common spaces, at sight. We shall destroy any confidential documentation once it is used and the conservation period has expired.





## Health and labor protection

The Company has as a priority to provide its members with a good work environment, with proper and equal conditions and respectful treatment, free of harassment and any kind of violence that affects the workers' dignity and rights.

In that sense, FAdeA **guarantees** equal opportunities and treatment to all of its members, and **prohibits** any discrimination for reasons of gender, sexual orientation, ideology, religion, race, disability, nationality, social background, political preference and any other reason that results in arbitrary conduct.

FAdeA's management staff, such as directors, managers and chiefs, are especially accountable to Foster work and good professional relations in the Company, highlighting the need to provide respectful and worthy treatment and also to provide fair conditions to perform their jobs.

Thus, management staff is accountable for ensuring that any aspect of the work relation is covered, treating employees accordingly, and avoiding any form of discrimination.

FAdeA shall neither tolerate any kind of harassment or inadequate behavior that

generates disturbance or unease against any individual, both in the workplace and out, nor labor persecution.

We must also avoid any behavior that may generate intimidation or offence towards peers or employees that may set them aside or discredit them, either related to their person or their work.

Retaliation and discrimination events are liable of disciplinary action and shall be kept in the personal file of the sanctioned employee, and shall be considered if the employee applies for a promotion or leadership position.

The Company acknowledges and guarantees its employees the right to choose a labor union and their choice of associating to it.

FAdeA acknowledges the right to health and safety in the workplace and for that purpose, employees shall comply with safety instructions and procedures for the individual and group safety, established to mitigate possible risks.

The Company commits itself to take action to prevent labor accidents and professional diseases, as well as preventing them through awareness campaigns.

All of us are personally accountable for complying with the safety measures related to our work position, and for avoiding exposing ourselves, our workmates or the facilities to hazards or damages.

Illegal drugs, narcotics and/or alcohol are prohibited during working hours, also coming to work under influence of any of these substances that affect personal, other people and the Company's integrity and health

In case we notice situations that contravene our standards, we must notify of such to our chief and the Ethics Office, or the Legal Affairs Division.

## **Environment protection**

FAdeA is committed to preserving the environment and preventing pollution by implementing practices to reduce environmental impact during its operations. FAdeA complies with the legal and administrative requirements and provides awareness training to its employees in this regard.

We must use our natural resources adequately and rationally, in such a way that our activities impact the environment in the least extent possible.

## **Treatment of customers and suppliers**

All of FAdeA's personnel, notwithstanding their standing or position, shall behave adequately towards customers, suppliers and any third parties, in a professional, transparent and respectful manner, following FAdeA's values and good faith principles. Also, FAdeA's members shall comply with protection of competition and antitrust standards, as applicable.

FAdeA's commitment towards its customers is to satisfy their expectations and business interests, providing quality products.

FAdeA's commitment towards its suppliers is to guarantee transparent procedures and equal conditions to participate, following objective criteria of quality, profitability and services.

Our relations with suppliers shall always be transparent and cooperative.



## Ethics guidance

In case of questionable conduct, we need to ask ourselves some questions to help us decide ethically:

- Are they asking me to do something legal, correct, upright?
- Will it harm FAdeA?
- Will it be perceived as non-transparent?
- Will my workmates agree when they know about it?
- Is it something that an upright, honest person would do?
- What will my family and friends think about it if they know?

On the other hand, when you hear any of the following, you could be compromising your ethical conduct in non-authorized activities:

- It does not matter how, we must deliver on time!
- We need to please the customer, now!
- Anyway, no one needs to know...
- Everybody does it...
- Just once, who will notice with whom we team up?
- Ethics is very good, but we cannot lose this business...
- It does not matter what they told you at the Ethics Office, I am your boss!

## Ethics line.

### How can I report a violation to the Code of Conduct?

Any conduct contrary to the principles of our Code of Conduct shall be reported. We must do so as FAdeA's employees, and also our customers and suppliers may report a violation.

FAdeA has the following ways available for reporting:

- Personally at the **Ethics office**, located in **Bdg. 1** in FAdeA.
- By e-mail to: **transparencia@fadeasa.com.ar**.
- By phone to Ext.: **6851**, or **4668787**.

- By means of the **web form** in FAdeA's website.
- In case the statement cannot be received by the Ethics Office, it can be reported to the Legal Affairs Division.

FAdeA allows for anonymous reports and in this case, it guarantees confidentiality of the reporting individual identity, as long as it is not requested via court order. Also, it shall guarantee no retaliations to the reporting person. No chief may prevent the person from placing a claim, in case this happened, they shall face disciplinary action.

## Reportable events

Here is a list of the events that we should report using the available means: misappropriation of assets, fraud, alteration of financial and accounting records, corruption, cybercrimes, sensitive information disclosure, conflicts of interest, mobbing, sexual harassment, violation of laws, threats and aggression, violation of Company standards, discrimination, blackmail.

## Non-reportable events

Also, a list follows with some events that should not be reported using this way, such as: request for salary increases, improvements in practices or processes in an area, disagreement regarding job assignments, request for help (donations, etc.), personal problems with Company employees or contractors, workmates personal problems, claims from the customer related to sales and / or services.

## Ethics line.

### How can I ask for guidance regarding our Code of Conduct?

In case there are any doubts regarding this Code of Conduct regarding its application, contents, possible violations and others, we may ask for guidance at the Ethics Office.

For guidance requests, the same means apply as for making a complaint.

In replacement of the Ethics Office, the Legal Affairs Division may provide assistance in the guidance requests regarding this Code.

## ANNEX I – CODE OF CONDUCT RECEPTION FORM

Dear FAdeA member:

By means of this form, you acknowledge receipt of the Code of Conduct chosen and approved by FAdeA's Board of Directors.

Thus you hereby declare to know, understand and accept its contents.

- **Date:**
- **Signature:**
- **Full name:**
- **ID number:**
- **Relationship with FAdeA:**

