



ACC COLUMBIA

— JET SERVICE —

Code of Ethics

Dear Colleagues and Business Partners,

We look forward to working with you! Please find below our Code of Ethics. This brochure will provide you with a wealth of information about our company. We urge you to adapt your business decisions to these guidelines at all times that provide the basis for a good, mutual cooperation.

To a good and successful cooperation!

Success through Performance – Responsibility – Fairness.

Management's message

Dear Colleagues and Business Partners,

We can be proud of what we have achieved together building our strong reputation in aircraft maintenance and repair around Europe. While it takes a lifetime to build a good reputation, it takes only a moment to destroy it. In challenging times, we must affirm and demonstrate our commitment to our values upon which our company is built.

As we try to continue our growth and success story, we want to be not only proud of our achievements, but also of how we achieve success. Acting as an honest and reputable businessperson is the basis of our existence and we believe in our success through Performance, Responsibility and Fairness.

Only if we behave integer and honest, we consolidate trust, embrace our values, and serve the best interests for the good of our company, our people, our customers, and our shareholders. This includes knowing - and complying with - the applicable legal requirements and internal rules.

We therefore ask you:

Use this set of rules in your everyday work and if you see something unusual in your work or environment, we encourage you to speak up. Let us work together to ensure that ACC COLUMBIA as a responsible employer stands for excellent service as well as integrity and fairness.

Thank you for your commitment and active participation.



Christian Kinitz



Nils Janßen



Overview

Our Company	1
Vision, mission, strategy and values statement	2
Safety and quality policy	3
How do we protect our values?.....	5
Conflict of interest.....	6
Illegal payments and anti-bribery	6
Protection of confidential information	6
Business practices	7
Consequences for violating the code.....	7



Our Company

ACC COLUMBIA Jet Service GmbH is a leading aircraft repair and maintenance organization for small, midsize and large cabin private aviation and transport category aircraft with major maintenance facilities at Hanover and Cologne/Bonn Airport, both being operable 24/7, as well as a satellite station for line maintenance in Paphos (Cyprus). Further supporting units are located in Wegberg and in Mitterskirchen.

Aircraft maintained in our premium service centers in Hanover and Cologne range from smaller Cessna Citation jets over Gulfstream, Embraer and Dassault aircraft makes to Bombardier Global series.

Our locations in Wegberg and Mitterskirchen are part of ACC COLUMBIA – Support and offer sheet metal works ranging from minor modifications up to huge structural repairs on virtually all types and makes of aircraft. The line maintenance station in Paphos (Cyprus) supports local customers, has developed an excellent reputation and fits perfectly into the ACC COLUMBIA network of locations. We are a professionally competent and reliable partner and offer you a wide selection of services at affordable prices and in high quality. Our staff is friendly and helpful at all times. We will enable you to plan ahead your aircraft operation with respect to all scheduled and unscheduled maintenance requirements. To maximize the availability of your aircraft while offering transparent and valuable services is a basic principle of our daily work. We promise to take care of your aircraft while you are able to devote to your business and know that you are receiving the highest level of safety, the chance to decrease your maintenance costs, and, last but not least, the continued smooth operation of your aircraft.

Acting as an honest and reputable businessperson is the basis of our existence.

Success through Performance – Responsibility – Fairness.



Vision, mission, strategy and values statement

Our Vision

By constantly developing and improving our long lasting experience, by continual pursuit of perfection and excellence as well as by the use of innovative solutions we aim to be among the leading and most accepted worldwide providers of maintenance services and modification works for business- and ambulance aircraft.

Our Mission

We want to perform our services in best quality and with highest safety standards in time, economically and environmentally sound in accordance with international and national laws as well as in line with industry standards and regulations. Our overall aim is to meet and exceed our customer's expectations at any time.

Our Strategy

We invest in the education of our personnel and in our excellently equipped facilities. We maintain premium aircraft being manufactured by Bombardier, Gulfstream, Cessna, Embraer or Dassault. We want to offer favorable and competitive services. We want to respond quickly and flexible to our customers' demand. With stable growth we strengthen our profitability as well as our liquidity and finally secure the existence and the permanent development of our company.

Our Values

We emphasize well educated personnel always being friendly and open minded towards each other as well as towards our customers and suppliers. We emphasize precise cooperation through team work and active communication of experience and expertise. We maintain an open and cooperative dialogue with our customers, with our suppliers and with public authorities. Prudence, reliability, punctuality and accuracy are important for us. We support and boost our personnel's own initiative.

Safety and quality policy

In providing our services we are guided by the following principles.

We want to:

- provide our customers with a competent, safe, accurate, faultless and environmentally friendly service that is geared to their needs and meets the best industry standards;
- strive for continuous improvement in all our activities;
- offer tailor-made innovative services, the result of which is cost-effective, safe and reliable;
- develop and modernise our resources;
- develop, implement and apply best industry practices;
- offer excellent services in aircraft maintenance;
- meet and exceed the expectations of our customers;
- provide a safe and healthy working environment for all employees and subcontractors;
- perform our work free from accidents and incidents;
- prevent accidents to life and limb and damage to or loss of property;
- identify possible risks and set up security measures against all known risks;
- comply with all relevant national and international industry standards, laws and regulations;
- promote the safety awareness of our employees;
- be prepared to respond adequately to any kind of emergency.

In order to achieve the objectives resulting from our safety and quality policy, our company has organized itself in such a way that the technical, administrative, legislative, safety and human factors that can influence the quality of our services are made manageable.

The main focus of our activities is the intention to take preventive and anticipatory measures in order to minimize the probability of errors or dangers occurring.

Every employee has safety-relevant as well as quality assurance tasks in his work area. It is his duty to carry out these tasks on his own responsibility according to the procedures and instructions issued. Safety-relevant tasks have first priority! In addition, every employee should also pay attention to safety- and quality-relevant errors or dangers

outside his own work area, point them out and announce them accordingly so that the responsible persons can correct and eliminate them.

The Safety & Quality Manager is commissioned by the management to introduce and monitor the safety and quality policy in the company. He continuously reports to the management on the effectiveness of the safety and quality system.

Safety and quality are the core elements of our business. We are therefore committed to developing, implementing, maintaining and continuously improving processes and strategies that ensure that all our business activities are conducted with a balanced use of our operational resources.

We therefore commit ourselves to:

- support the safety management by providing all appropriate means to create an internal culture that enables safe working practices, encourages effective hazard reporting and communication, and actively and purposefully addresses all safety issues with the same attention as all other procedures;
- establish the regulation of safety issues as the primary responsibility of all employees and managers;
- provide clear definitions of responsibility and accountability for operational safety and the function of our safety management system for all employees, including management personnel;
- establish and maintain a hazard reporting system;
- establish and maintain a process for hazard identification and risk management to prevent or mitigate, to the extent reasonably practicable, security risks arising from hazards arising from our activities;
- ensure that no action is taken against employees who have reported incidents, errors, near misses or other safety concerns through the hazard reporting system, unless such a report clearly indicates a criminal offence, a breach of duty to customers or service providers, gross negligence or an intentional or deliberate disregard of laws or procedures;
- meet and, where possible, exceed legal and other requirements of the company (norms, standards);
- ensure that a sufficient number of trained and experienced staff are available to implement security policies and processes;

- ensure that all employees are provided with adequate and appropriate information and training with regard to their work and, in particular, safety at work;
- ensure that all staff are competent in security matters;
- ensure that employees are only entrusted with tasks commensurate with their abilities and in accordance with the principles relating to human factors;
- ensure that all employees are provided with and use the personal protective equipment required for their particular work area;
- ensure that all employees are given regular occupational health examinations;
- establish and maintain a system that measures our safety level with realistic indicators and set targets for the safety level;
- continuously improve our safety level through management processes that ensure that effective safety measures are taken;
- ensure that systems or services supplied to us for support by external parties are delivered or executed in such a way that they meet our safety standards;
- review our safety and quality policy as part of the annual management review and to revise it if necessary.

How do we protect our values?

ACC COLUMBIA Jet Service GmbH is committed to conducting business honestly and ethically no matter what part of the world we and our partners are operating in.

A continuous improvement process is our declared goal. The prerequisite should always be compatibility with our fundamental values. We stand for honesty, respect, responsibility, trust, integrity and fairness. We demand sound business judgment from every member of ACC COLUMBIA Jet Service GmbH, ranging from the board of directors, over management staff to all other employees or business partners at every level. Their actions shall be ethical and in compliance with all applicable laws. The actions of every man and woman at ACC COLUMBIA Jet Service GmbH shall always be guided by the high standards that define us. We want the same principles from our business partners.

Conflict of interest

ACC COLUMBIA Jet Service GmbH expects their board of directors, their management staff and all other employees or business partners to avoid conflicts of interest and situations that create the appearance of a conflict of interest. Should a potential conflict of interest arise, the Company's Corporate Compliance Officer must be notified immediately. This includes conflicts of interest between ACC COLUMBIA Jet Service GmbH and personal interests of relatives, friends and acquaintances.

Illegal payments and anti-bribery

All persons conducting business on behalf of or with our company are required to comply with the requirements of the [U.S. Foreign Corrupt Practices Act \(FCPA\)](#), the [U.K. Bribery Act](#), the German [Gesetz zur Bekämpfung der Korruption](#), the EU-[Bestechungsgesetz \(EUBestG\)](#) and other anti-bribery and anti-corruption laws of any countries where we are conducting business.

No payments must be made that do not comply with the previously mentioned laws. This includes, in particular, bribes, kickbacks and other remuneration or consideration directed to persons, companies or organizations in order to influence business decisions or gain advantages. In addition, the board of directors, management staff and all other employees or business partners of ACC COLUMBIA Jet Service GmbH are prohibited from offering gifts, payments, gratuities or luxury hospitality to influence or solicit business.

We refer to our Hospitality Guideline, which is dedicated both to our business partners and employees.

Protection of confidential information

ACC COLUMBIA Jet Service GmbH has comprehensively secured confidential, business-critical and proprietary information against outside access. To ensure that this data is secure, the board of directors, management staff and all other employees or business partners who have access to the data must also ensure that their actions do not lead to outsiders gaining access. In addition, sensitive data such as personal data, business plans, strategy papers, customer lists, processes, methods, or other documents that are crucial to competition should only be passed on according to the need-to-know principle.

Employees and managers are also made aware in the handling of personal data through Datenschutzgrundverordnung (DSGVO) training courses. We also require DSGVO-compliant behavior from business partners in their business relationships.

Misuse of material inside information in connection with trading in the company's securities or a partner company's securities can expose an individual to civil liability and penalties under Art. 14 and 15 of the Market Abuse Regulation (MAR) by the European Parliament and or other applicable statutes or acts.

Business practices

ACC COLUMBIA Jet Service GmbH and its board of directors, management staff and all employees or business partners always want to be open and honest in dealing with competitors. This includes refraining from making defamatory statements about competitors. Information about competitors may only be gathered by permissible means and knowledge acquired in an impermissible manner may not be used to gain an advantage over the competitor. The board of directors, management staff and employees or business partners are also required to report information openly and honestly about unethical, fraudulent and illegal conduct or violations of company policies and procedures to our management.

The board of directors, management staff and all other employees are committed to equal opportunity in the company for all employees. We promote diversity and act with respect and responsibility towards all partners in our business. We use our time at home for regeneration so that we can achieve a better work-life balance and complete our daily work at a constant level of quality.

Consequences for violating the code

The policies in this Code of Ethics explicitly set forth the requirements for the board of directors, management staff and all other employees or business partners. In the event of a violation of the guidelines, ACC COLUMBIA Jet Service GmbH reserves the right to take disciplinary action. This specifically includes termination of employment or business relationship. The severity of disciplinary action can be positively influenced by voluntary reporting of ethical violations and cooperative collaboration in addressing the matter.

Remember acting as an honest and reputable businessperson is the basis of our existence.

Do you have questions or comments?

When in doubt please do not hesitate to contact the Corporate Compliance Officer to issue a complaint or ask in case of any question or comment.

Corporate Compliance Officer:

Can Varol

Mobile: +49 162 2364 729

E-Mail: c.varol@acc-columbiajet.com

ACC COLUMBIA Jet Service GmbH

Airport Hannover - Hangar 16

Postfach 42 01 20

30661 Hannover

Germany

