

**ATR**

# Code of conduct



[atr-aircraft.com](http://atr-aircraft.com)

 **into life**

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, sub-contractor, seconded employee etc.), director & manager of ATR but also those of any entities over which ATR has control (hereinafter referred to as “ATR’s subsidiaries”) in their 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 as it reinforces our zero tolerance attitude towards any form of corruption and influence peddling by making integrity an inherent part of our business culture.

This Code of Conduct contains several cross-references to additional procedures and documents that provide detailed guidance for certain specific matters. These additional directives and documents are available on ATR intranet as well as on ATR 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 Compliance and Export Control Department, or by using the OpenLine system available on ATR intranet.

Any breach to 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”.

## → COMPLIANCE CONTACTS

For suggestions, questions or guidance in understanding and applying this Code of Conduct, you may contact ATR’s Compliance & Export Control Department, or your Compliance Focal Points, who can provide support and assistance:

 **E-mail:** [Compliance@atr-aircraft.com](mailto:Compliance@atr-aircraft.com)

 **List of Compliance Focal Points:** [Click here](#)



# A message from our CEO

Dear Colleagues,

We are all engaged to create a bright future for ATR and reinforce our leadership in regional aviation.

To reach this goal, since we put the customer at the centre of all we do, reputation is our most valuable asset. We need to earn and maintain the trust of our customers, and of all our stakeholders, and trust is beforehand a matter of confidence in the integrity of the other party.

It is therefore crucial that ATR proactively demonstrates zero tolerance towards any form of corruption by developing a compliance culture and systems that are strong enough to prevent any unethical or illegal behaviour.

Accordingly, ATR’s Ethics & Compliance policies have to be rock-solid and shall be regularly updated to be in line with applicable regulations and ethical standards.

We need, each and every one of us, to know and implement these policies rigorously and constantly maintain our knowledge of such policies, through continuous training.

Ethics and compliance, starting from policies and procedures, have to become a foundation of our everyday work and guide our relationships with our colleagues and external stakeholders, and be embedded in our corporate culture.

Trust and Respect are two values that we have chosen to define our Company. These are the values that each one of us needs to actually believe in, live and apply.

I am fully committed to promote them anywhere and anytime and I trust you will all join me in this endeavour!

**Nathalie Tarnaud Laude**

Chief Executive Officer



# Combating corruption

## → DEFINITIONS

**ATR applies a strict zero tolerance policy towards any form of corruption.**

Corruption is generally defined as 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.

### **Corruption is generally defined as:**

- Public or private, depending on whether public or private officials/entities or individuals are involved
- Direct or indirect, in the case third-party intermediaries are used for corrupt purposes
- Passive or Active, depending whether a person is actively solicited or solicits a bribe

Corruption can take many forms and triggers various risks for ATR. It is therefore crucial for ATR Group employees to read, understand and acknowledge the principles and recommendations set out in this Code of Conduct.

As a principle, 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; or
- solicit, receive or accept a bribe, facilitation payment or kickback from any individual or entity

We must not remain wilfully ignorant of, or turn a blind eye towards, any form of corruption and are all responsible for ensuring that each and every one of us applies these rules in her/his daily activities.

## → INFLUENCE PEDDLING

**As per applicable laws and regulations, influence peddling is considered as a form of corruption and is therefore strictly prohibited by the ATR Group.**

**Influence peddling** 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 favourable decision.

### **🔍 Example**

**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.**

→ *Fees paid to consultants in order for them to abuse of their influence with a public authority in order to obtain a favourable decision is defined as influence peddling, and is strictly forbidden.*

✓ **DO**

- ✓ Treat consultant agreements with particular caution. Note that extra caution should be urged when dealing with public officials
- ✓ Involve the Compliance and Export Control Department to perform due diligence prior to entering into a consultant agreement
- ✓ Always request and obtain documentation showing the services were rendered as per the terms agreed in the contract

✗ **DON'T**

- ✗ Use a consultant or any other third party to exert undue influence or to obtain undue advantages

→ **FACILITATION PAYMENTS**

**Facilitation payments** are illegal payments made to public officials to speed up routine administrative processes or decisions.

Facilitation payments are strictly prohibited by the ATR Group.

Under exceptional circumstances, facilitation payments may be tolerated if they are necessary to safeguard the health, safety or welfare of ATR Group employees. In such cases, payments must be immediately reported to the ATR's Compliance & Export Control Department.

🔍 **Example**

**You are required to travel abroad in two weeks and must therefore obtain a visa urgently. At the embassy, a 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€ note.**

→ Such practice is defined as a facilitation payment and is therefore strictly prohibited by the ATR Group.

✓ **DO**

- ✓ Question the legality of the payment, ask for a receipt and, if necessary, request to speak to the public official's manager
- ✓ Explain such arrangement is prohibited by the ATR Group
- ✓ Refuse such type of arrangement, regardless of the amount, and inform your management of the delay

✗ **DON'T**

- ✗ Agree to make the payment

→ **DEALING WITH THIRD PARTIES**

In the course of our business, we are dealing with multiple Third Parties including, but not limited to, customers, suppliers, public authorities, intermediaries. Whilst they are crucial to our business activity, interactions with Third Parties may give rise to potential compliance risks and must therefore be conducted in compliance with applicable laws and regulations, as well as with this Code.

**Third Party:** means any physical or legal person that is not part of ATR Group or an ATR Member. This can include, but is not limited to, customers, suppliers, public authorities, intermediaries etc.

As a general rule, we must never interact with a third party with the objective to do something that cannot be ethically or legally done by ourselves directly, or which would go against the principles set out in this Code.

ATR has implemented robust controls in order to prevent the risks generally associated with dealing with Third Parties.

## CUSTOMERS

ATR conducts business with reputable customers, who are involved in legitimate business activities and whose funds are derived from legitimate sources only. Consequently, before any business can be undertaken, and in order to avoid any risk of **Money Laundering**, ATR performs specific due diligence procedures known as “Know Your Customer (KYC)”.

**Money Laundering** is the process by which a person or company makes illegally obtained proceeds (“dirty money”) appear legitimate (“clean”).

### Example

**Prior to making a payment related to a customer credit, you realise that customer’s bank is located in a tax haven country.**

→ *Bank accounts located in tax haven countries constitute a red flag and should therefore be reported to the Compliance and Export Control Department and the Finance team. Further checks might be considered prior to issuing the payment.*

### DO

- ✓ Explain that the due diligence and KYC requirements are part of ATR’s process, which applies to all third parties
- ✓ Report any red flags related to payments to the Compliance and Export Control Department and the Finance team
- ✓ If needed, request supporting documents from the customer as required by the Compliance and Export Control Department and the Finance team

### DON'T

- ✗ Agree to make such payment without prior confirmation from the Compliance and Export Control Department and the Finance team

## SUPPLIERS

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 (including anti-corruption ones), 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 commitments in particular in the fields of business ethics, anti-corruption, human rights (*e.g. fight against human trafficking and child labour*), labour standards and environmental sustainability.

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 utmost, in particular through adapted contractual documentation, and that the selection of each supplier is solely based on the merits of each offer.

### Example

**A supplier refuses to provide the information requested as part of the KYS process since they have been working with ATR for years.**

#### DO

- ✓ Explain that the due diligence and KYS requirements are part of ATR's process, which applies to all of our suppliers
- ✓ If the supplier still refuses to provide the requested information, report this as a red flag to the Compliance and Export Control Department to discuss further resolution

#### DON'T

- ✗ Consider that long-lasting business relations allow suppliers, or other third parties, to avoid the due diligence process

## PUBLIC AUTHORITIES

In the course of its business activities, 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 Directorate.

Specific laws (including but not limited to the French Sapin II Law, the UK Bribery Act, the US Foreign Corrupt Practices Act) and regulations apply to relationships with public officials and their family members. Extra caution must therefore be applied when dealing with public officials and their family members.

### Example

**You meet the representative of a public authority responsible for aircraft certification. He asks if his son can take part in an internship at ATR.**

→ *Treat such request with caution, as an offer of internship could be considered as an advantage and therefore fall within the definition of corruption.*

#### DO

- ✓ Politely accept to review the CV and explain to the representative that his son may apply for an internship via ATR's normal recruitment procedure.

#### DON'T

- ✗ Promise to hire the representative's son

## INTERMEDIARIES

Intermediaries are used to support business development opportunities in certain countries. They may be used in countries where we do not have a commercial presence. They can support in assisting ATR with the identification of prospective customers or any other third party involved in a business opportunity (such as prime contractor or financing institutions). Intermediaries can also support in liaising with Public authorities.

Due to their roles and responsibilities, intermediaries often present higher corruption risks. ATR employees interacting with Intermediaries must therefore apply extra caution when dealing with these third parties.

It is however reminded that ATR's policy is not to use the services of intermediaries.

### Examples

**Whilst following up on the work performed by an intermediary, you realise that the reports provided as proofs of services are extremely vague and do not clearly describe the list of actions undertaken on behalf of ATR.**

→ *Services rendered as part of an agreement with an intermediary must always be documented via activity reports and available upon request, both for commercial follow-up and audit purposes.*

#### DO

- ✓ Always include a clear description of the services to be provided by the Intermediary in the service agreement
- ✓ Obtain documented proofs that the services were effectively rendered as per the agreement

#### DON'T

- ✗ Agree to pay an intermediary without documented proofs of services

## Key ATR Reference Documents:

-  Business Development Anti-Corruption Policy Procedure
-  KYC / KYS Procedure

## → MANAGING GIFTS AND HOSPITALITY

ATR recognises that 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.

**Gift:** means any good, service, benefit or advantage, for which the beneficiary pays either nothing or less than the fair market price, offered or received in the frame of a business relationship for personal use or for consumption by the beneficiary. In addition to the most traditional meaning of the word "Gift" -- something given for free, whether a pen, item of clothing or something larger -- the term Gifts has a broad meaning that can include virtually anything, for which the beneficiary does not pay the fair market price, such as subsidized housing or home improvements, educational courses or opportunities and scholarships. The definition of Gifts overlaps with that of Hospitality, which is why this Procedure often refers to them collectively as "Gifts & Hospitality".

**Hospitality:** means any form of meals, refreshments, leisure, entertainment, travel, accommodation, educational courses or opportunities, or any other Benefit for which the beneficiary pays either nothing or less than the fair market price. The definition of Hospitality often overlaps with that of Gift, which is why this Procedure often refers to them collectively as "Gifts & Hospitality".

ATR employees, 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 Gift and Hospitality Procedure.

To ensure full transparency, any giving or receiving of Gifts or Hospitality must be fully and accurately recorded by using the Gift & Hospitality Tool available on ATR's intranet, and approved if required under the applicable Procedure.

### Examples

**A supplier is taking part in a tender that is organised by ATR and offers you a gift in exchange for your positive recommendation during the selection process.**

→ *Such proposal must be refused, documented and declared to ATR's Compliance and Export Control Department.*

#### DO

- ✓ Explain to the supplier that ATR has put in place specific rules regarding Gift and Hospitality and that receiving the Gift in exchange of a positive recommendation would contravene such rules
- ✓ After declining the Gift, report it in the Gift & Hospitality Tool with the support of the Compliance and Export Control Department, if needed

#### DON'T

- ✗ Accept the Gift (in this case, accepting the Gift would be perceived as a way to unduly influence a business decision-making process, which equates to corruption)

**To maintain a good business relationship with a customer, you want to offer him a box of chocolates for the New Year.**

→ *This gift is deemed acceptable 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 to the applicable procedure.*

#### DO

- ✓ Request necessary approvals as per the Gift and Hospitality procedure prior to making the Gift
- ✓ Record the Gift via the Gift & Hospitality Tool regardless of its value

#### DON'T

- ✗ Purchase the gift without prior approvals required as per the Gift and Hospitality Procedure

**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.**

→ *Approving such advantage could compromise the customer's independence, as well as ATR's reputation.*

#### DO

- ✓ Politely explain to the customers that such request would go against ATR's Gifts and Hospitality Procedure as it is purely recreational and of excessive value
- ✓ Offer to assist the customer by providing recommendations on where to stay or places to go to in Naples

 **DON'T**

-  Accept to cover for hospitality expenses that are not of a professional nature

**Key ATR Reference Documents:**

-  Gifts & Hospitality Procedure
-  Gifts & Hospitality Tool

**→ MANAGING CONFLICTS OF INTERESTS**

ATR is committed to putting the company's interests ahead of any direct or indirect personal interest, therefore ensuring that all decisions are based solely on the merits of each option.

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

**A Conflict of interests** is characterised when an employee, officer or director is in a situation where his/her personal interests interfere with those of ATR. The appearance of a Conflict of Interests is sufficient to characterise its existence, as it is not up to employees to assess their ability to make impartial, objective and independent decisions related to a situation which may directly or indirectly impact them.

A Conflict of Interests is potential if the employee, manager or director is likely to find themselves, through their actions or those of a third party, in the situation described above because of their ties of interest.

Conflict of interest situations, which may arise at any time, are not illegal per se but need to be declared and managed in accordance with the relevant Procedure.

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

 **Example**

**While reviewing the commercial proposals received as part of a tender process launched by ATR, you realise that one of the respondents is a company owned by one of your close relatives.**

→ *This situation might give rise to a potential conflict of interests, especially if you are part of the decision-making process related to this tender.*

 **DO**

-  Disclose and discuss your situation with your line manager and the Compliance and Export Control Department via the dedicated Declaration forms
-  In case the conflict of interests is confirmed, step out of any decision-making process related to this supplier

 **DON'T**

-  Refrain from openly speaking about your situation as conflict of interests may have negative impacts and consequences both for you and ATR

**Key ATR Reference Documents:**

-  Conflict of Interest Procedure
-  Conflict of Interest Declaration Form



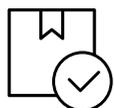
## Competing fairly

We must strictly comply with applicable competition laws in the countries where we do business. These laws forbid agreements or behaviors 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 Department.

### Key ATR Reference Document:

 Antitrust Dos and Don'ts



## Import & export control

ATR purchases goods and services from a whole array of suppliers and sells goods and services to a whole array of customers, all of which are 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.

**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 includes transfers carried out orally, via email, by post, hand-carried, through a server, etc.

Not meeting export control obligations can have severe consequences, such as reputational damage, fines and the inability to continue to serve customers.

### To follow all applicable laws, regulations and procedures, we:

- classify our products, technologies, services, and any other item we may export or import, to determine how they are controlled and obtained
- obtain proper authorizations and licenses before exporting or importing where required
- comply with government-approved export and import authorizations and licenses.
- screen transactions against relevant sanctions and restricted parties and confirm that the end-use, end-user, and destination(s) are permitted
- mark products, documents, software, and other controlled items to safeguard these commodities and technology, both physical and intangible, against unauthorized export, import, transfer, or release
- maintain accurate record keeping, tracking, and submit reports as required.

### Example

**An airline customer, subject to export restrictions, requests documentation which does not have an export control statement. You are not sure whether the document contains technical data that needs to be classified, marked and approved for export.**

→ *Technical data comes in all forms and is not allowed to go to each and every destination without proper licenses in place.*

**DO**

- ✓ Check with the document owner to determine if the document contains technical data
- ✓ Contact your Export Control department to get the appropriate help with the classification and marking
- ✓ Confirm the approval of the export and adhere to the record keeping requirements

**DON'T**

- ✗ Send it to your customer without checking if an export control marking is needed and prior to verifying with your Export Control Department if the destination and end-user/end use are authorized to have such information

The Compliance and Export Control Department is available to answer any questions or concerns related to the import or export of goods, services or information.

**Key ATR Reference Document:**

 Export Control Directive



# Safety & quality

To fulfil our commitment to provide 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 Reference Documents:**

-  Flight Safety Policy
-  Flight Safety Voluntary Reporting Process



# Corporate citizen

## → 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.

**Donation** refers to payment or giving to a specific cause or project of general interest or charitable purpose carried out by not-for-profit entities or organizations, where there is no expectation of direct consideration. Donations may include both monetary and in-kind contributions.

**Sponsorship** refers to a mutually beneficial business relationship between a sponsor (the ATR Group), on the one hand, and an organization (the Beneficiary), which offers rights and partnership that may be used for commercial or reputational advantage, on the other hand; for example, providing visibility to the ATR Group during an event organized by the Beneficiary. Sponsorship may include both monetary and in-kind contribution of goods and/or services.

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; they shall satisfy one of ATR's strategic priorities with respect to sponsorship and donations and shall be consistent with ATR's brand positioning. Sponsorships and Donations

must never be used for corrupt purposes, such as exerting undue influence or obtaining an undue advantage.

ATR must 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.

### Example

**While negotiating the renewal of a contract, a customer requests that ATR should make a donation to a foundation headed by one of their family members.**

→ *Such request may be deemed inappropriate, especially since it is made prior to renewing a contract (and might therefore be conditioning the sales).*

#### DO

- ✓ Explain to the customer that ATR has a specific process for Sponsorships and Donations, through which their request would need to go

#### DON'T

- ✗ Agree to make such donation without prior review and confirmation from the Communication Directorate and the Compliance and Export Control Department

### Key ATR Reference Document:

-  Sponsorship & Donation Procedure

## → STRIVING FOR ECO-EFFICIENCY

### KEY PRINCIPLES

At ATR, we have a responsibility towards the global community to protect the environment in our operations and throughout our value chain. This is why ATR adopts environmental performance objectives by taking into account the environmental issues relating to its business activities.

In addition, ATR must comply with all applicable environmental laws and regulations and has adopted internal policies to this effect. We therefore promote eco-efficiency in all of our activities by striving to reduce the overall ATR environmental footprint, particularly our use of hazardous substances and carbon dioxide emissions.

We also engage with our stakeholders to reduce the environmental footprint of ATR products and services. ATR expects its supply base to embrace, follow, and cascade its environmental sustainability principles

All ATR employees have a responsibility to uphold our commitment to environmental protection through their day to day work activities.

### FIGHT AGAINST GLOBAL WARMING

Climate change is one of the greatest challenges of our time.

To achieve the aviation industry's goal of net-zero carbon emissions by 2050, ATR is committed to reducing greenhouse gas emissions in line with the Paris agreement.

ATR incorporates climate issues into its strategy, research and development and product design, as well as throughout the industrial manufacturing process.

## PRESERVE NATURAL RESOURCES AND MANAGE HAZARDOUS SUBSTANCES

Beyond addressing climate issues, ATR is striving to reduce its environmental footprint.

Accordingly, ATR is committed to promoting eco-design for new developments and to minimizing chemical risks, the use of non-renewable resources and energy consumption.

### ✓ DO

- ✓ Follow ATR rules regarding storage and use of chemicals and aiming at reducing our environmental impact (e.g., *energy consumption, segregation of waste, prevention of pollution*)
- ✓ Report any abnormal situation that could affect the local environment
- ✓ Require our supply chain to reduce its environmental footprint and to comply with environmental regulations as well as with ATR' suppliers' requirements

### ✗ DON'T

- ✗ Mix different types of wastes when separate waste collection is available
- ✗ Accept environmental practices in our supply chain that we would not accept for ATR operations

### 🔍 Example

**As an individual employee, can I really contribute to reduce ATR environmental impact?**

→ Yes, you can. All relevant functions have a responsibility to ensure that environmental aspects are integrated into daily decision-making. Collectively, we can make a difference.

→ There are some easy things we can do such as turning off lights, only printing what we need, recycling paper, and avoiding or reducing business travel. All of these things can have a positive impact on our environment.

#### 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 Reference Documents:

- 📄 ATR's Environmental Objectives
- 📄 Environmental & Quality Policy



## Assets & information

### → PROTECTING ASSETS

We must protect ATR's assets, such as aircrafts, 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 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.

#### Key ATR Reference Documents:

- 📄 IT Charter ATR

#### 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.

#### 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.

### → MAINTAINING ACCURATE RECORDS

Our members, business partners, government authorities and any relevant stakeholder rely on the accuracy and correctness of the information provided by ATR. 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 applicable laws and regulations, as well as with our internal control procedures. We may neither create nor participate in the creation of records that mislead or conceal improper activities.

## → PROTECTING PERSONAL DATA

### & CONFIDENTIAL INFORMATION RECORDS

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, including the European Union General Data Protection Regulation ("GDPR").

The protection of personal data is everyone's responsibility and it is up to us to respect the essential principles such as the limitation of data, access on a restricted basis, secure and limited storage in time.

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 Directorate.

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 Directorate.

The disclosed information and content of published material, such as brochures, advertisement and editorial support, should be accurate and should be based on facts when dealing with the products, services or employees of our competitors.



## Our working environment

### → PEOPLE

ATR recognises the need to create a pleasant working environment where equality, fairness, respect, solidarity, integrity, honesty and transparency guide the interactions with 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 applicable health and safety laws and with internal policies and procedures.

We attract, recruit and develop our employees on the basis of their qualifications, their potential and their merit, regardless of their origin, religion, gender, age, sexual orientation, gender identity, family situation, disability or any other characteristic.

We strive to create an inclusive work environment that respects and builds on differences to achieve the best results.

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's success depends on the success of its employees.

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.



## **Disciplinary sanctions**

Violations of the principles set out in this Code of Conduct or failure to fully comply with related Procedures may lead to disciplinary sanctions in compliance with ATR's Group internal regulations ("règlement intérieur") as well as with applicable laws, regulations and procedures.



## **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 Compliance and Export Control Department or use the OpenLine available at [www.airbusgroupopenline.com](http://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.

#### **Key ATR Reference Documents:**

 Speak up

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