

Thommen Aircraft Equipment (TAE) describes below the Principles of Ethical and Professional behavior and states his committed to follow the principles to demonstrate honest and proper business practices.

Principles of conduct

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1. Honesty, Integrity and Fair Play

Thommen Aircraft Equipment Management and its Employees are fully committed to the principle of honesty, integrity and fair play in the delivery of services and goods to the public. All Employees should ensure that the business operations, applications for services, procurement or Employees recruitment, are dealt with in an open, fair and impartial manner.

This Principles of Conduct sets out the basic standard of conduct expected of all Employees and Thommen Aircraft Equipment 's policy on matters like acceptance of advantages and conflict of interest of Employees in connection with their official duties.

These Principles also applies to temporary and part-time Employees employed by Thommen Aircraft Equipment.

2. Equal Opportunity for All Employees

Thommen Aircraft Equipment is an equal employment opportunity employer. Employment opportunities are available regardless of race, color, sex, religion, national origin, age, disability or other legally protected status. This Principle applies to all aspects of the employment relationship, including recruiting, hiring, training, work assignment, promotion, transfer, termination, and wage and salary administration.

3. Safety, and Health Practices

Thommen Aircraft Equipment is committed to an injury-free and illness-free workplace in compliance with all relevant laws and regulations that protect worker safety and the environment. Employees should perform work in a safe manner.

4. Fair Competition

Thommen Aircraft Equipment 's policy will prohibit any anticompetitive practices which could effect in bounding, restraining or distorting competition, as well as any practices of an unfair competition.

5. Governance and anti-corruption

Thommen Aircraft Equipment has zero tolerance for corruption. All employees must never offer to provide anything of value directly or indirectly to government officials and business partners to secure an undue advantage.

6. Financial Reporting

All transactions of Thommen Aircraft Equipment must be duly recorded so as to permit preparation of clear financial statements in conformity with generally accepted accounting principles. No false or misleading entries may be made in the books and records of Thommen Aircraft Equipment for any reason, and no employee may engage in any arrangement that results in such a prohibited act.

7. Restrictive Agreements with Third Parties

Thommen Aircraft Equipment does not condone activities that seek to gain an unfair competitive advantage. No individual may engage in any activity which violates any valid restrictive agreements entered by that individual for the benefit of a third party, and no individual may, directly or indirectly, use or disclose any confidential information or trade secrets of a third party that the individual obtained while employed by or associated with such third party.

8. Government Contracts and Services

Thommen Aircraft Equipment is committed to complying with all applicable laws and regulations relating to government (public procurement) contracts and services and to ensuring that its reports, certifications and declarations to government officials are accurate and complete and that any deviations from contract requirements are properly approved.

9. Acceptance of Advantages

It is the policy of this Company to prohibit all Employees from soliciting or accepting any advantage from any persons having business dealings with Thommen Aircraft Equipment (e.g. clients, suppliers, contractors).

For gifts presented to Employees in their official capacity and of low nominal value (below 50 CHF), the refusal of which could be unsociable or impolite, can be exceptionally accepted. In other circumstances, the Employees should seek for a clear (i.e. in writing) and immediate (within 5 days from the offer) consent from his superior to accept the gifts.

10. Conflict of Interest

A conflict of interest situation arises when the "private interests" of the Employees compete or conflict with the interests of Thommen Aircraft Equipment. "Private interests" means both the financial and personal interests of the Employees or those of their connections including family members and other close affiliates; personal friends; the clubs and societies to which they belong; and any person to whom

they owe a favor or are obligated in any way. Employees should avoid using their official position or any information made available to them while their duties to benefit themselves, their affiliates or any other persons with whom they have personal or social ties. They should avoid putting themselves in a position that may lead to an actual or perceived conflict of interest with Thommen Aircraft Equipment. Failure to avoid or declare any conflict of interest may give rise to criticism of favoritism, abuse of authority or even allegations of corruption. Employees involved in the procurement process should declare conflict of interest if they have beneficial interest in any company which is being considered for selection as Thommen Aircraft Equipment supplier of goods or services.

Employees who misuses their official position for personal gains or to favor their relatives or friends are liable to disciplinary action or even prosecution.

11. Handling of Classified or Proprietary Information

Employees is not allowed to disclose any classified or exclusive information to anybody without authorization. Employees who have access to or are in control of such information should always provide adequate safeguards to prevent its abuse or misuse.

12. Property of Thommen Aircraft Equipment

Employees given access to any property of Thommen Aircraft Equipment should ensure that it is properly used for conducting Thommen Aircraft Equipment 's business. Misappropriation of the property for personal use or resale is strictly prohibited.

13. Outside Employment

Employees who wish to take up paid outside work, including those on a part-time basis, must seek the written (date and signed) permission and guidance from Management before accepting the job.

14. Compliance with the Principles

It is the personal responsibility of every Employees to understand and comply with the Principles of Conduct.

The superiors of each employees should ensure that their subordinates understand and comply with the standards and requirements stated in the Principles. Any doubts of interpretation or problems encountered, as well as any suggestions for improvement, should be addressed to the management for consideration and advice.

15. Reporting of Violation

Employees have a responsibility to promptly report to Thommen Aircraft Equipment any violation of the Principles.

Employees will not be disciplined or retaliated against in any way for reporting violations in good faith. Retaliation against any employee for reporting policy violations, or for testifying, assisting or participating in any manner to inspections is strictly prohibited. Any employee who believes he or she has been subjected to or has witnessed retaliation must immediately report the alleged retaliation to the superior.