

AERO CONSULTANTS UK

CODE OF CONDUCT

Aero Consultants UK and our commitment to a sustainable development.

With heart and mind.

Demonstrating prudence, acting consciously and gaining insight.



CONTENTS

3 FOREWORD

4 OUR CODE OF CONDUCT

Complying with laws and regulations, taking into account cultural values

Respect for human dignity

Environmental protection

Social commitment

Data protection

Data secrecy

Competition and antitrust regulations

Responsible raw material procurement

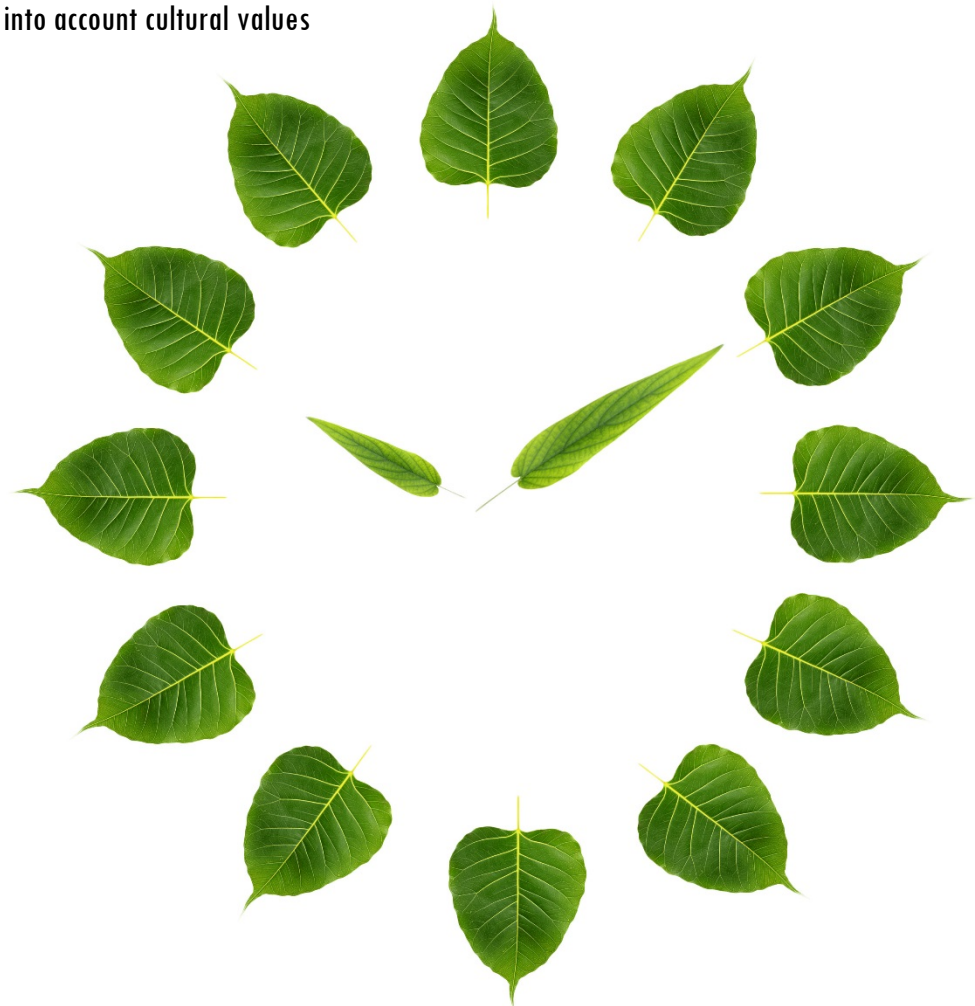
Import and export regulations

10 CONTRACTUAL OBLIGATION / CONSEQUENCES

Communication and accountability

11 TRANSPARENCY

2 Code of Conduct



FOREWORD

DEAR READERS,

We believe that success cannot be measured by a company's profit only.

Global issues such as climate change, the scarcity of natural resources, ever shorter economic cycles, the increase of global population and demographic change have an impact on markets and patterns of demand, presenting new challenges for business activities. As a customer, supplier, employee, interested member of the public or partner, you expect us to provide definite measures and responses. And rightly so.

We believe in that...

SUSTAINABILITY

Is for us a strategic factor giving us a significant competitive advantage and is the

BASIS OF ALL OUR BUSINESS RELATIONSHIPS.

Sustainable, conscious action by all employees and high standards regarding the careful use of all resources in accordance with a company's economic objectives are no fad or trend, they rather form the basis of our daily activity and decision-making. An elementary aspect of this is that we continue to develop our activities, standards and guidelines to suit the changing conditions.

RESPONSIBILITY

Responsibility already starts before the goods arrive at our warehouse directly in collaboration with our manufacturers during the procurement process. The basis for this is our

CODE OF CONDUCT,

a binding code of conduct for all employees and business partners. We attach great importance to responsible business conduct throughout the entire supply chain and cooperation based on mutual trust with you, as our customers, suppliers, dealers, contractors and other suppliers of goods and services all over the world. We expect compliance with and observance of valid laws and regulations as well as the conditions of our Code of Conduct.

All these guidelines have to be seen under the context of Aero Consultants complying with the principles of the United Nations' Global Compact. The Code of Conduct sets out the conditions we impose on our business partnerships at Aero Consultants UK and how you can help implement the Code of Conduct.

You can find our valid Code of Conduct and more at

www.aero-consultants.co.uk



B. Arnold
President

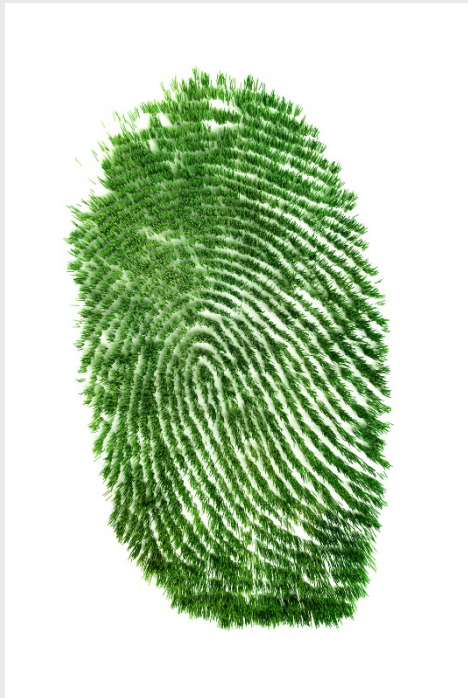
C. Müller Arnold
Vice President

D. Coniff
Sales and Marketing Director

D. Price
Finance Director

PREAMBLE

Aero Consultants UK (hereinafter referred to as “Aero”) attaches great importance to responsible business conduct throughout the entire supply chain and cooperation based on mutual trust with our suppliers, advisers, brokers, commercial agents, distributors, contractors, agents and other suppliers of goods and services to Aero all over the world (hereinafter referred to as “business partners”).



Aero believes that respecting basic social, economic and environmental principles forms the basis of any responsible and sustainable corporate action. As such, Aero expects its business partners to comply with legal provisions on working conditions, health, environmental protection, fighting corruption and safety at the workplace and to make their employees and sub-contractors familiar with the content of this Code of Conduct and with comprehensible formulations.

Aero expects its business partners – as we expect of ourselves – to comply with the conditions set out below.

Aero also expects that every company in the value chain stands by the Aero Code of Conduct in equal measure.

A serious violation of the principles contained in this Code of Conduct will generally be considered a breach of a fundamental contractual obligation.

COMPLYING WITH LAWS AND REGULATIONS, TAKING INTO ACCOUNT CULTURAL VALUES

Behaving in compliance with the law is our highest priority. We act prudently and responsibly in accordance with the laws, guidelines and accepted behavioural codes of the cultures and countries in which the signatory business partners operate worldwide.

We expect compliance with and observance of valid laws and regulations. Naturally, this obligation applies to applicable guidelines as well as recognised operational rules of the cultures and countries around the world in which the business partners and Aero operate. Aero expects its business partners – as we expect of ourselves – to set up and maintain a monitoring system to ensure compliance with these laws, rules and regulations.

RESPECT FOR HUMAN DIGNITY

In business, as in the state and society, we see the dignity of human beings as the top priority and treat employees equally regardless of their gender, religion, background, education or age.

NON-DISCRIMINATION

It is Aero policy, by conviction, to recruit people with different backgrounds and experiences.

OUR CODE OF CONDUCT

HEALTH AND SAFETY

Aero expects its business partners – as we expect of ourselves – to ensure a safe and healthy work environment.

This includes in particular, appropriate sanitary conditions and health and safety policies and procedures.

We expect that suitable protective equipment is provided to all employees free of charge. Safety-related information on dangerous substances must be provided to employees if there is a legitimate need.

In case of fire or other emergency, there must be adequate and clearly marked emergency exits. Escape routes must be visible and clearly described, free from obstruction and signposted. Fire alarms and fire extinguishers should be installed on each floor. All applicable laws on occupational health and safety, hygiene, fire safety and risk protections must be complied with and regularly trained.

All necessary permits, licences and registrations must be complied with, maintained and up-to-date.

Strict compliance with the safety regulations is a prerequisite. Any violations must be resolved immediately.

WORKING HOURS

Aero expects its business partners – as we expect of ourselves – not to exceed the statutory maximum working hours. The workforce is entitled to one non-working day in a seven-day week, as well as appropriate annual leave.

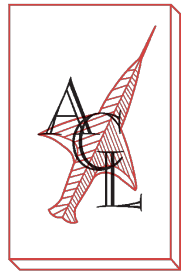
REMUNERATION

Aero expects its business partners – as we expect of ourselves – to pay equitable remuneration to employees and to compensate for compulsory overtime in accordance with the statutory provisions. In particular, this includes compliance with the statutory provisions on the minimum wage. Wages must be paid regularly and in legal tender.

PROHIBITION OF CHILD LABOUR

Aero does not tolerate child labour or any exploitation of children or young people. The term «child» refers to any person under the age of 15 years (or 14 years, depending on local law) or school-age persons or those who have not yet reached the minimum employment age applicable in that country. The highest age limit applies. We encourage approved training programmes that comply with all laws and regulations. Workers under the age of 18 years may not perform any work that may endanger the health and safety of young workers.

Aero expects its business partners – as we expect of ourselves – to comply with the prohibition of child labour.



REJECTION OF FORCED LABOUR

All forms of forced labour are rejected by Aero. Aero expects of its business partners – as we expect of ourselves – that no staff member may be directly or indirectly compelled to work by means of violence or intimidation.

TRADE UNIONS / EMPLOYEE REPRESENTATIVES

Aero expects its business partners – as we expect of ourselves – to respect the right of workers to freedom of association, freedom of assembly and collective negotiations, as far as this is legally permissible and possible in that country.

OUR CODE OF CONDUCT

ENVIRONMENTAL PROTECTION

We are committed to an integrated approach to environmental protection and the responsible use of natural resources.

For us, environmental protection includes measures that serve to prevent pollution damage on the natural environment. This includes knowing, documenting and observing legal requirements, the proper disposal of waste, sustainable land use, logistics and customer solutions and the increasing use of digital media, among other things.



We expect that the resources of energy, water and raw materials are used sparingly and efficiently.

The use of renewable raw materials and the development of environmentally-friendly packaging should be supported by every individual.

As a result, Aero expects its business partners – as we expect of ourselves – to comply with the environmental protection regulations and standards that apply to their operations at each location. In addition, Aero uses natural resources responsibly.

ENVIRONMENTAL PERMITS AND REPORTING

Aero expects its business partners – as we expect of ourselves – to obtain and maintain all the required environmental permits, approvals and registrations. All notification and reporting requirements must be followed. There should also be a written procedure to notify the authorities or governing bodies in case of accidental leaks or release of dangerous substances into the environment or in the event of an environmental disaster.

AVOIDING POLLUTION AND REDUCING THE USE OF RESOURCES

Any form of waste, including water and energy, must be avoided or reduced; either directly at the action site or by procedures and measures, such as adapting production and maintenance processes or internal processes, using alternative materials, saving resources, recycling and reusing materials.

DANGEROUS SUBSTANCES

Aero expects its business partners – as we expect of ourselves – to identify and use chemicals or other materials that are at risk of spilling into the environment in such a way that their handling, transport, storage, use, recycling, reuse and waste management are entirely safe.

WASTEWATER AND SOLID WASTE

Aero expects its business partners – as we expect of ourselves – to standardise, inspect and monitor wastewater and solid waste from operations, production processes and sanitary systems before their introduction or disposal and to make sure they undergo the correct treatment.

AIR EMISSIONS

Aero expects its business partners – as we expect of ourselves – to standardise, inspect and monitor emissions of volatile organic chemicals, aerosols, corrosive materials, particles, anti-ozone layer chemicals or by-products resulting from combustion and to make sure they undergo the correct treatment.

RESTRICTIONS ON PRODUCT INGREDIENTS

Aero expects its business partners – as we expect of ourselves – that all applicable laws, regulations and customer requirements are respected with regard to the prohibition or restriction of specific substances. This includes the labelling requirement for recycling and disposal.

SOCIAL COMMITMENT

Entrepreneurial action means future-oriented action. As a family business, the Aero Consultants UK and, with it, the Board of Aero, have always stood by this principle.

We are dedicated not only to the areas of customer service, employees, environment and along the supply chain, but also to an integral approach to our fellow human beings.

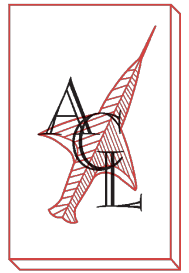
Active promotion of non-profit, social organisations and support of numerous projects in arts and culture, training and education are particularly close to our hearts.

Aero expects its business partners – as we expect of ourselves – to contribute to the social and economic development of the country and the region in which operations take place and to promote voluntary activities by its employees.



DATA PROTECTION

Digital media, social networks and blogs are increasingly gaining in importance. Due to the diverse number of communication channels that we use for customer support on a daily basis, our customer database containing contact details is a crucial foundation for optimum customer support. We guarantee you that all data provided to us is kept strictly confidential and will not be forwarded onto third parties without your confirmed consent. All privacy rights are respected.



SECRECY

The factor of security is not just an elementary component of customer support and processing. It is firmly anchored in our corporate philosophy at the core of every transaction with all stakeholders and with the values of trust, dependability, honesty and directness both internally and externally. As such, the confidential handling of sensitive information and data internally and externally is a matter of course.

Aero expects its business partners – as we expect of ourselves – to protect the personal data of all customers and employees and to observe the national and international data protection rules. Aero expects its business partners – as we expect of ourselves – to protect personal data from access and illegal use by unauthorised persons.

Aero expects its employees and business partners to keep all sensitive information as well as operating and business secrets confidential.

OUR CODE OF CONDUCT

COMPETITION AND ANTITRUST PROVISIONS

We have derived valid codes of conduct for all employees from our corporate and management values. These apply as binding regulations across all divisions and departments when dealing with one another.



CORRUPTION, BRIBERY AND EXTORTION

Aero does not tolerate any form of corruption, bribery extortion or any other illegal granting of advantages.

Business partners – like Aero itself – must ensure that no personal subjections or obligations to customers, suppliers or business partners arise through bribes, backhanders, kickback payments or other illegal payments.

Gifts or invitations may not be accepted or given if they could reasonably be assumed to influence business decisions.

Agreements or collateral arrangements to agreements based on the exploitation or favouring of individuals during the negotiation, procurement, delivery, settlement or payment of orders are not permitted. Any employee who allows themselves to be unfairly influenced by customers or suppliers or tries to unfairly influence them, shall be held accountable by way of disciplinary process – regardless of criminal consequences. Attempts by suppliers or customers to unfairly influence Aero employees in their decision-making, must be reported to the relevant head of department. It is not allowed to offer, give or receive trips or other invitation that have no legitimate business purpose and/or could be interpreted as bribery, including if the destination in question has no connection to a business site.

ANTITRUST LAW

Our business partners – like Aero itself – commit themselves to fair competition. Competition-protective laws, in particular the antitrust law and other competition-regulation legislation must be adhered to without exception.

Illegal agreements on prices or other terms, sales territories or customers, as well as a misuse of market power, boycotting (e.g. refusing to deliver to a customer) contravene Aero policies.

RESPONSIBLE RAW MATERIAL PROCUREMENT

Aero Consultants UK purchases goods around the world and is therefore situated in an international procurement environment. Compliance with social and environmental standards is regulated by law in most of our sourcing countries and violations are punished by the state. However, violations of human rights and employment laws cannot be excluded with certainty in some sourcing countries. Our binding Code of Conduct and quality audits are intended to prevent these kinds of risks.

The supplier must devise measures to ensure that, to the best of their knowledge and belief, the tantalum, tin, tungsten, cassiterite, coltan and gold used in the products they manufacturer do not directly or indirectly finance or support armed groups committing serious human rights violations in crisis regions, as per section 1502 of the Dodd-Frank Act. All parties should exercise due diligence in terms of the origin and chain of custody of these minerals and disclose these diligence measures to their customers on request.

IMPORT AND EXPORT REGULATIONS

We strictly adhere to the applicable import and export control laws during the transportation and shipment of goods.

Our business partners – like Aero itself – must adhere to all applicable import and export control laws, especially all sanctions, embargoes and other laws, regulations, government directives and policies concerning the transportation or shipment of goods and technologies.



COMMUNICATION AND ACCOUNTABILITY / CONSEQUENCES

COMMUNICATION AND ACCOUNTABILITY

We understand the principles and requirements of our Code of Conduct to be standard for all our customers, suppliers and business partners, but also for ourselves. This is the basis of our mutual cooperation.

The business partners of Aero shall communicate openly to employees, customers, suppliers, subcontractors and other interest groups and stakeholders about the requirements of this Code of Conduct and its implementation. All documents and materials are dutifully created, properly stored and not unfairly changed or destroyed.

The signatory company shall disclose to Aero on request all the information required for the purpose of checking compliance with this Code and inform Aero independently of anything that does not comply with the provisions of the Code. Aero reserves the right to make unannounced checks, with our assessor being granted access to all the relevant areas.

Aero also reserves the right to have their business partners compliance with this Code of Conduct investigated by a specialist independent organisation. Aero is obliged to share the results of these audits with their business partners. All employees must be given the opportunity to anonymously report inappropriate behaviour. Aero intends to enforce its Code of Conduct for an indefinite period, but reserves the right to modify or terminate this Code of Conduct at any time and in any way with or without giving reasons.

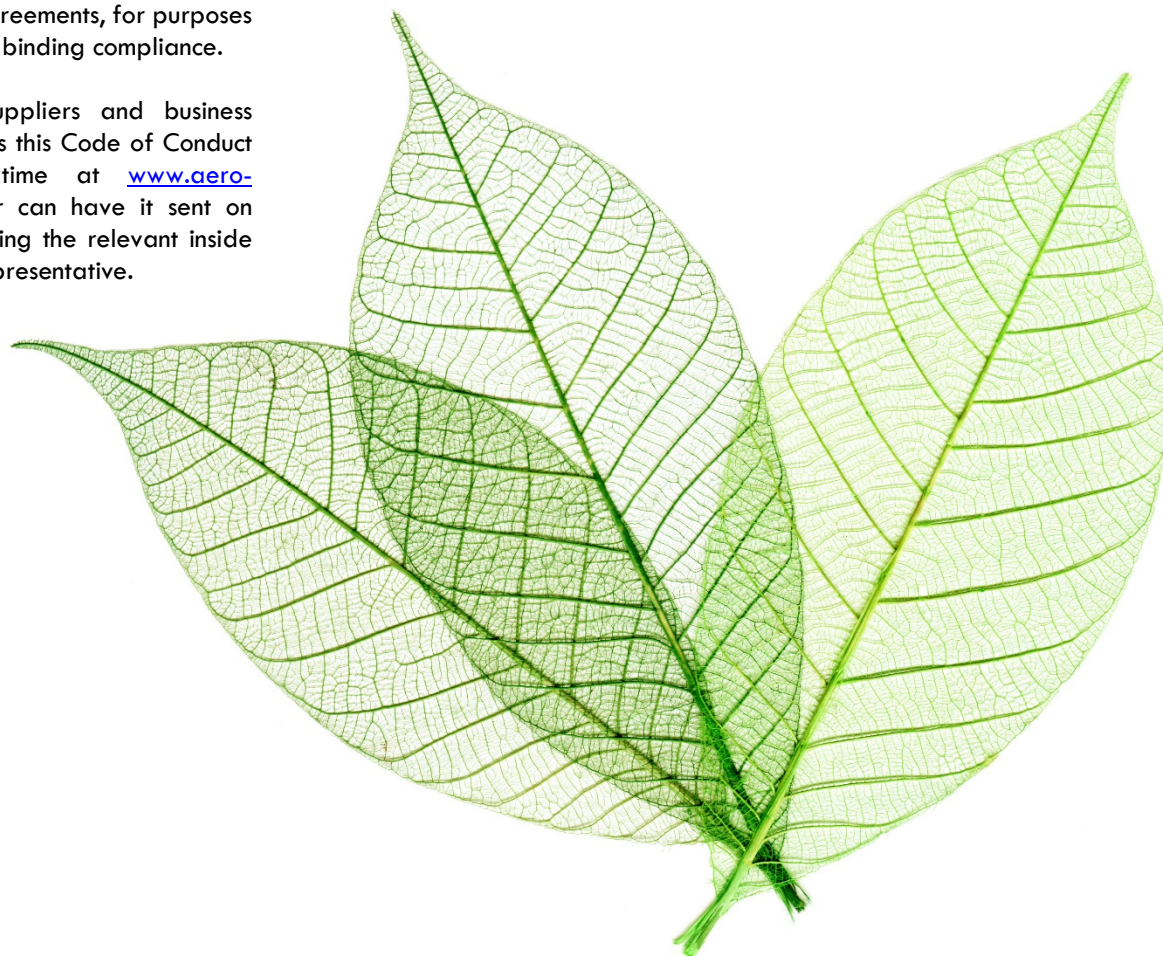
CONSEQUENCES

Aero will not immediately terminate a business relationship on the grounds of a breach of the Code of Conduct, if the partner shows willing to improve the situation as agreed by the parties. In the event of a repeat offence, however, and if we see not satisfactory improvement in this situation, Aero has the right to end the business relationship by extraordinary notice of termination.

TRANSPARENCY

This Code of Conduct is considered binding and employees can access it at any time online on the internal platform. We also hand it out to all new employees and trainees during their induction as part of our company agreements, for purposes of information and binding compliance.

Our customers, suppliers and business partners can access this Code of Conduct online at any time at www.aero-consultants.co.uk or can have it sent on request by contacting the relevant inside or outside sales representative.



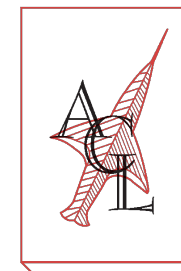
Aero Consultants (UK) Ltd.
13-14 Clifton Road
Huntingdon
PE29 7EJ
United Kingdom
T +44 (0)1480 432111
sales@aero-consultants.co.uk
www.aero-consultants.co.uk

© Aero Consultants UK

Responsible for contents:
D. Coniff

ISSUE 05/19

Images: Fotolia / (S1. S12. 9comeback, S2. seaskylab, S4. Leigh Prater, S6. bygimmy, S7. MR, S8. yukipon00, S9. Scanrail, S11. Delphotostock)



You can find our Code of Conduct on our website at www.aero-consultants.co.uk

