

---

# ***CODE OF ETHICS***

**NORTHERN AVIONICS SRL**

---

# 1. CONTENTS

1. Contents
2. List of amendments
3. Company history
4. Ethical Vision
5. Recipients
6. Amendments
7. Ethical principles
  - 7.1 Protection of employee's dignity and integrity
  - 7.2 Health, Safety at work and Environmental protection
  - 7.3 IT Systems
  - 7.4 Protection of confidentiality of information
  - 7.5 Protection of intellectual property
  - 7.6 Conflict of interest
  - 7.7 Use of corporate assets
  - 7.8 Cyber security
  - 7.9 Gifts and generosità
  - 7.10 Anti-bribery and corruption
8. Ethical behaviour and external relations
  - 8.1 Managers duties
  - 8.2 Relationship with Associates

8.3 Relationship with Partners

8.4 Relationship with Civil servants

8.5 Relationship with Customers and Suppliers

8.6 Relationship with Competitors

8.7 Quality level of services

9. Internal control system

9.1 Reporting violations

10. Applicability



### 3. Company history

Northern Avionics Srl is an EASA Part 145 Maintenance Organization (IT.145.0004) born in 1993 from the melting of the previously existing avionics facilities located in Milano Linate airport.

Since then, the Company has performed electro-avionics maintenance, repairs and installations for the majority of the Italian General Aviation aircraft fleets. In the same time, Northern Avionics has obtained the rank of Dealer and Repair Center from the most important avionics Manufacturers and from Leonardo SpA as Authorised Service Center.

From 2005, Northern Avionics is EASA Design Organization (EASA.21J.223) and STC Holder in electro-avionic area. Beginning from 2010, Northern Avionics is C1 & C2 EASA Production Organization (IT.21G.0041) too.

In 2017, Northern Avionics has been approved as AER(EP).P-145 (EMAR 145) Military Maintenance Organization (Ministero della Difesa – Certificate no. 020).

After a long experience on maintenance, design and production, Northern Avionics Srl has reached (2018) the maturity to provide training courses relevant aeronautics and avionics contents and it is able to offer the first complete Avionics Service Center for private civil aviation in Italy and one of the best in Europe.

The Company is located in Milano Linate airport where it has its offices, shops and hangar facility in which are performed the activities related to the design, maintenance, repair, avionics installations and electro-avionics components production.

## 4. Ethical Vision

This Ethic Code (in this context the “Code”) is a document that Northern Avionics Srl (here referred as “Company”) adopts to identify and share, internally and with its Suppliers, the values and principles by which the Company acts and for which it demands respect.

Northern Avionics performs its design, production, maintenance and training activities in respect of International, European and National regulations as applicable.

The Company rejects any illegal or unlawful practice, with attention to the offences with the Public Administration and with the environmental; accident prevention regulations and offences relevant the hygiene and worker protection.

Company affords and protects as essential and inalienable, each behaviour aimed to avoid and to condemn any individual discrimination based on religious beliefs, health status, age, gender, race, nationality, sexual orientation, physical aspect, political or trade union opinions.

Northern Avionics considers its image and reputation as a main force which must be protected, safeguarded and developed in respect of principles and values above.

Company will not establish or continue trade relations with anyone who expressly or implicitly refuses to respect the principles of this Code.

Any known breach of this Code by a Northern Avionics employee, subcontractors or partner must be immediately reported.

Observance of the rules contained in this Code must be considered an integral and essential part of the contractual obligations of employees, subcontractor and partners, pursuant to Article 2104 of the Italian Civil Code.

## 5. Recipients

Northern Avionics managers, employees at each level and anyone who give specific authorities or power or represent Northern Avionics must constantly adhere to and abide by this Code when carrying out, day-by-day her/his activities, as well as report any breach of this Code to the CEO as soon as they become aware of it.

With reference to its suppliers, Northern Avionics makes of the principles of this Code as one of the main evaluation criteria to establish or continue trade relations with third organisations when one of these expressly or implicitly refuses to respect the principle of this Code.

This document is available on intranet for employees and published in Northern Avionics web-site for Customers, subcontractors and partners utility.

Northern Avionics provides for the widest possible dissimulation of the Code of Ethics to its employees, who are required to know and comply with its provisions to the extent of their competence, as well as to promote awareness of it among new employees and third parties with whom they come into contact during their work.

## 6. Amendments

The Code is part of Company's handbooks. Its contents are established by the Northern Avionics CEO which is responsible for any subsequent amendment.

A review takes in account the suggestions received from recipients, development of the applicable/adopted National and International regulations and practices and, last but not least, by the experiences gained through applying this Code.

This Code and its subsequent amendments will be published and made available through the Northern Avionics website.

## 7. Ethical principles

### 7.1 Protection of employee's dignity and integrity

Northern Avionics believes in diversity and embrace the advantages different experiences, skills and outlooks they can bring.



This approach includes, but is not limited to the prohibition of unfair discrimination based on breed, age, sex, pregnancy and maternity, marriage and civil partnership, religion and belief, disability, sexual orientation or gender reassignment, or any other unlawful ground.

Northern Avionics pursues equality of treatment and applies the meritocratic criterion with its employees.

The Company undertakes to create and maintain a working environment suitable for the professional growth of employees, ensuring the protection of their privacy and the right to work without being subjected to malfeasance or conditioning.

We all have responsibility for our own behaviour and for maintaining an environment in which prejudice is opposed and eliminated and where anyone is treated fairly, with respect and dignity.

## 7.2 Health, Safety at work and Environmental protection

Compliance with legislative requirements and our policies is the minimum threshold of acceptability.

Employees, subcontractor and partners are required to scrupulously comply with the rules and obligations arising from the relevant health, safety and environmental legislation, as well as to comply with all measures required by internal procedures and regulations in order to protect their own and others' safety.

Northern Avionics organizes generic and specific training activities aimed at raising staff awareness on accident prevention and environmental issues.

The Company, as well as its suppliers and partners, are committed to:

- ✓ record and report incidents as required by law;
- ✓ have in place procedures for investigating and rectifying any unsafe condition; and
- ✓ provide appropriate and relevant HSE (Health, Safety and Environment) training for all personnel (and for non-employees where appropriate) and ensure that such training is kept up to date and regularly refreshed as appropriate.

Northern Avionics considers the environment and the nature as a fundamental value and an heritage of all, to be protected and defended, and at this scope makes every effort to direct its activities towards respect for these.

Company constantly supports a healthy and clean environment preventing and minimizing harmful environmental impact and protecting natural resources, by:

- implementing a continuous improvement of one's own environmental performances;
- identification of critical areas;
- perform a dedicated training about the environment protection in respect of business activities.

### 7.3 IT Systems

IT systems and the information related to it are in exclusive property of Northern Avionics.

Northern Avionics takes appropriate measures and initiatives to ensure the security integrity, correct use and operation of computer systems, programmes, telematic data of the Company or third parties, also protecting intellectual property rights and the integrity of information made available to the public through the internet.

The Company requires employees to comply with rules above laid down on Company's security, so as not to compromise the functionality and protection of computer systems.

It is forbidden to alter the operation of a computer or telematic system or to intervene illegally, in any way, on data, information or programmes contained therein, even if they are the property of others.

Last but not least, it is forbidden to use IT tools for storing, exchanging and sending materials with illegal contents or not related to the Company's activities.

### 7.4 Protection of confidentiality of information

Northern Avionics protects confidential information, such as proprietary business information, personal information and sensitive data of which it has become aware during activities, relating to Customers, Suppliers and business partners in compliance with current legislation.

Confidential information includes any information about Northern Avionics, subcontractors or partners that is not in the public domain (including, but not limited to, the knowledge of a project, proposal, initiative, negotiation, intention, effort, agreement, fact or event, forecast, and the financial data related to these) which, if published, could cause damage, direct or indirect, to Northern Avionics, subcontractors or partners and could hinder the achievement of the business purposes and goals of its activity.

The information above must only be used in the performance of Company's activities except when disclosure is authorised by the Company with writtent consent or imposed by laws or provisions.

Special measures should be taken when circulating documents containing confidential information to internal staff and third parties in order to avoid possible damage to Northern Avionics.

## 7.5 Protection of intellectual property

Northern Avionics requires to its managers and employees to operate in respect of International, European Community and National applicable requirements concerning the protection of intellectual property.

Use of Northern Avionics name, trademarks, logos or images is forbidden unless expressly permesse in writting in accordante with Northern Avionics' policies.

In the same way is forbidden to reproduce, copy, disclose or use, in whole or in part, the information contained into Northern Avionics documents, manuals etc, both in content and format, by

any persons or organisations without the espressa written consent of Northern Avionics.

## 7.6 Conflict of interest

Between Northern Avionics and its managers, employees at any level, subcontractors and partners there is a relationship of complete trust, within which it is the primary duty to use company assets and their own work capacities to achieve the Company's interest.

Employees and partners must ensure that each business decision is taken in the interest of Northern Avionics, preventing and avoiding any kind of conflict of interest, potential or claimed, between her/himself or her/his family and Northern Avionics.

A conflict of interest includes, but is not limited to:

- ✓ having economic and financial interests, even if through relatives, with Customers, subcontractors, suppliers or competitor;
- ✓ developing activities, also in the case of relatives, for Customers, suppliers, subcontractors or competitors;
- ✓ using their working position or the information they can access at work in such a way that could cause a potential or claimed conflict between their own interests and Northern Avionics.

When one of above situations occurs, and before to operate any kind of actions, the employees must promptly and transparently inform the CEO and follow his dispositions.

## 7.7 Use of corporate assets

Working tools and any goods owned and provided by Northern Avionics must be used by the employees with diligence, in an appropriate manner and in compliance with the Company's interest.

Company assets may not be used for personal purposes outside the work activity, nor may they be transferred or made available for any reason whatsoever, to third parties

Employees and partners are responsible for the corporate assets and resources available to them and must use them in an efficient and ideal manner so as to protect their value.

They must alert and inform their managers of any loss or risk of loss of assets as soon as they become aware of this.

## 7.8 Cyber security

Northern Avionics protects each relevant information asset. This includes appropriate governance and management of potential risks and the monitoring of compliance with the relevant laws and regulation applicable.

Company utilizes several methods to prevent cyber attacks, not authorized accesses to its IT system and for the protection of data, such as:

- ✓ antivirus and antimalware softwares;
- ✓ use of appropriate complex passwords (strong password must be long, contain a combination of upper and lower case letters, numbers and special characters);
- ✓ periodical change of password used;

- ✓ use of a virtual private network (VPN);
- ✓ back-up of data on regular base on a owned server;
- ✓ maintain upgrade is official software;
- ✓ not authorize the down load of not official software on Company's IT system and devices;
- ✓ training personnel on cyber security principles (awarness) and the ability to identify potential risk situations;
- ✓ monitoring the cyber aspects

## 7.9 Gifts and generosity

Northern Avionics only sponsors events that have a charitable, cultural or sporting value.

Donations or gifts are granted exclusively to recognised associations and foundations, as well as to regularly constituted non-profit organisations in compliance with accounting, civil and tax regulations.

Acts of commercial courtesy, such as gifts or hospitality of moderate value (maximum value 15,00 € or equivalent), may be allowed in accordance with the Anti-Bribery and Corruption policy provided that they comply with any applicable laws or regulations.

To this end, the traciability of gifts given and received shall be censure and the receipt of gifts shall take place exclusively at the Northern Avionics' Headquarters in Milan and the CEO shall be informed.

### 7.10 Anti-bribery and corruption

In order to guarantee maximum transparency in the economic and financial management of the Company, Northern Avionics prohibits its managers and employees from replacing or transferring money, goods or other utilities deriving from illegal activities, or carrying out other operations in relation to them, so as to hinder the identification of their origin.

In relation to business relations undertaken on behalf of the Company, the managers and employees must ensure that partners, Customers, suppliers or third parties provide adequate guarantees of honourableness and reliability.

The Company does not purchase goods that, in respect of the conditions offered, give reason to doubt the lawfulness of their provenance and does not entertain economic relations with persons who give reason to believe that they are engaged in unlawful activities.

## 8. Ethics behaviour and external relations

All recipients, including entities that in any capacity carry out their activities for the Company, are required to be familiar with the rules contained in this Code of Ethics and the reference rules, which regulate the activity carried out deriving from the Law or from internal procedures and regulations.

Recipients must also read and accept the obligations deriving from this Code of Ethics, when establishing the employment



relationship, when the Code of Ethics is first disseminated or when any relevant amendments or additions are made.

The recipients are also required to:

- ✓ refrain from conduct contrary to the rules contained in this Code of Ethics;
- ✓ refer to their superiors or to the Company contact persons in the event of a request for clarification on how the rules are applied;
- ✓ promptly report (not anonymously) to their superiors, or to the Company contact persons any news, whether directly observed or reported by others, concerning possible violations and any request for violation;
- ✓ cooperate with the structures in charge of verifying possible violations;
- ✓ adequately inform third parties with whom they come into contact in the course of their work about the existence of the Code of Ethics and the commitments and obligations imposed on them;
- ✓ demand compliance with the obligations that directly concern their activity;
- ✓ take appropriate internal and, if within its competence, external initiatives in the event of failure by third parties to fulfil their obligation to comply with the Code of Ethics.

## 8.1 Managers duties

At each manager of Northern Avionics is requested to be:

- ✓ an example to his or her direct collaborators by his or her own behaviour;
- ✓ emphasise to them that compliance with the Code of Ethics is an essential part of their job performance;
- ✓ perform a control function on the correct implementation of the Code of Ethics for the areas within its competence;
- ✓ take immediate corrective measures when required by the context;
- ✓ prevent and impede any kind of retaliation.

## 8.2 Relationship with Associates

Associates (including but not limited to, consultants, agent, legal, finance and tax advisor, professional studios and intermediaries) must share the principles of this Code.

Northern Avionics managers and employees must carefully evaluate the need to use associates and their professional appropriateness before engaging with them, as well as require them to confirm that they have read the Code and will abide by it.

## 8.3 Relationship with Partners

Northern Avionics' manager and employee shall not promote business initiative such as establishing business groups or associations or buying shares without the relevant approvals according to the Northern Avionics policies.

#### 8.4 Relationship with Civil servants

Relationships with Civil servants will be managed only and exclusively by managers, employees, and/or associate to whom this duty has been delegate, and are inspired by the strictest compliance with the applicable regulatory provisions and the principles of trasparency and fairness.

No Northern Avionics managers, employees, nor associated or can promise, pay or grant amounts, favours in kind or any other type of direct or inderect benefit to Civil servant in order to foster or favour the interests of Northern Avionics, not even as a consequence of unlawful pressure nor to renard a person for carrying out their normal duties in the terms set out in the Anti-Bribery and Corruption Policy.

#### 8.5 Relationship with Customers and suppliers

For the Company, primary goal is the Customer's sactisfaction assuring works performed in respect of applicables laws and in accordante with technical specifications and delivery conditions, increasing the sactisfaction of its services by providing true, appropriate and complete information.

Northern Avionics and its managers, employees undertake to treat Customers and suppliers courteously, correctly, honourably and honestly and maintain the highest standards of ethics in their relationships with them.

Northern Avionics expects its customers and suppliers, as well as their supply chain, to abide by the principles and guidance

set up in the Code, or to have implemented its own equivalent codes.

## 8.6 Relationship with Competitors

Northern Avionics acknowledges the basic importance of a competitive market and it avoids practices that could breach the laws governing competition and the market

## 8.7 Quality level of services

Northern Avionics pays the utmost attention to the quality level of services rendered to its Customers.

Company activities are oriented to obtain maximum Customer satisfaction and the Northern Avionics' primary objective is to guarantee:

- ✓ optimal quality standards in the performance of its business activities;
- ✓ the reliability of the services rendered;
- ✓ guaranteeing in any case the utmost confidentiality of information acquired in the performance of the service.

In addition to the above principles, personnel are also required to comply with the operating procedures adopted.

## 9. Internal control system

Northern Avionics carries out internal controls, processes and measures to monitor Company's activity in order to guarantee, with reasonable certainty, adherence to this Code and to the Northern Avionics' policies, to obtain the following objectives:

- ✓ protect Company's assets;
- ✓ build a corporate culture and promote its compliance with the applicable laws and regulations, as well as internal guidelines and policies;
- ✓ efficiency, effectiveness and profitability of Northern Avionics's activities;
- ✓ reliability and accuracy of Company information circulated internally or to third parties;
- ✓ keep the relevant corporate information confidential

### 9.1 Reporting violations

For the implementation of this Code, a confidential way has been established. Employees, subcontractors and partners can report any current or potential breach of a failure to comply with the Code of Ethics' policy, as well as to make any question about their interpretation or application.

Reports can refer, but not limited, to any of the following:

- a. Bribery or corruption has taken place, or is likely to take place.

- b. There may be fraud or other irregularities going on in the way transactions, goods or services are being paid for, recorded or invoiced (or in the failure properly to record or invoice them).
- c. The health or safety of any individual is being, or is likely to be, endangered by the way activities are being carried out.
- d. Any other criminal offence has taken place, or is likely to take place.
- e. There has been, or is likely to be, a failure to comply with legal obligations.
- f. There has been, or is likely to be, a miscarriage of justice.
- g. The environment has been, or is likely to be, damaged.

## 10. Applicability

This Code comes into effect on December 1<sup>st</sup> 2023.