

CODE OF CONDUCT



Table of Contents

Statement/Commitment of the Chairman	3
Ethics and Fairness	4
Human Rights	4
Health and Safety.....	5
Environment and Sustainability	5
Conflicts of Interest and Anti-Corruption	6
Sanctions and Export Control Regulations.....	6
Anti-trust and Fair Competition	7
Data Protection, Privacy and Information Security	7
Respect and Speak up culture	8
Compliance, Applicability and Implementation.....	8

Statement of the Chairman

"The Diamond Aircraft Group is an international leader in the design and manufacture of cutting-edge light aircraft. Our passion for aviation is matched only by our drive to innovate.

Our business encompasses single and twin-engine aircraft for the general aviation, special mission, and flight training markets, as well as flight simulators.

We are headquartered in Austria with facilities in Canada and China, with more than 1,500 employees and are amongst the leading aircraft manufacturer in General Aviation. We also support a worldwide network of sales partners, distributors, and service centers.

Our ambition to achieve global leadership in so many markets brings with it a clear responsibility to society. With an eye to future generations, we must commit to the principles of cooperation, sustainability, equal opportunity, and the pursuit of prosperity for all.

As Group Chairman, ensuring these principles are respected across our companies ranks among my highest priorities. My vision to achieve this is through fair, transparent policies that can be applied evenly at all of our locations, and with full respect for local customs and international norms.

In this spirit, I introduce you to our Group's Code of Conduct."

Bin Chen, Chairman Diamond Aircraft



Ethics and Fairness

- ◆ *We act honestly.*
- ◆ *We promote diversity and equal opportunities in the workplace.*
- ◆ *We act reliably and responsibly.*

Diamond Aircraft requires from its managers, employees and contracted staff that they conduct business with respect and appreciation, honesty and integrity, reliability and responsibility. Full compliance with the applicable laws of the countries in which Diamond Aircraft operates is a matter of course.

Diamond Aircraft is committed to upholding international standards such as the principles of the United Nations Global Compact and the documents it is based on, like the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, the United Nations Convention against Corruption or the United Nations Universal Declaration of Human Rights.

Diamond Aircraft expects the same from its business partners.

Human Rights

- ◆ *We respect human rights.*
- ◆ *We do not tolerate any form of discrimination.*
- ◆ *We provide equal opportunities and support diversity.*

At Diamond Aircraft, it is our conviction that respect for human and civil rights must be the foundation of society. Thus, Diamond Aircraft's human rights approach is consistent with internationally recognized principles and considers legal requirements, such as those of the UK Modern Slavery Act 2015. Diamond Aircraft rejects and does not tolerate any form of human trafficking, forced, compulsory or child labor, discrimination based on race, color, religion, sex, age, origin, nationality, disability, sexual orientation or on any other grounds, or any form of (sexual) harassment, insults, aggression, hurtful or indecent behaviors.

Diamond Aircraft is committed to provide equal opportunities and fair treatment for all employees in all employment-related decisions such as recruitment, promotion, training and development, compensation, and termination of employment, and Diamond Aircraft complies with applicable labor laws and social legislation, including the recognition of the right to collective bargaining and freedom of association, in accordance with local laws.

Health and Safety

- ◆ *We do not compromise on safety.*
- ◆ *We avoid and report unsafe situations in the workplace.*
- ◆ *We produce to the highest safety standards.*

Diamond Aircraft understands health and safety as an integral part of the corporate culture. Healthy, safe, happy, motivated, and committed employees are key for the long-term success of Diamond Aircraft's business.

Diamond Aircraft pursues a comprehensive health and safety strategy and procedures as well as regular inspections and training courses at its production facilities. Every employee needs to understand his or her responsibility for the implementation of occupational safety and health.

Any accident or emergency at a (production) site bears the risk of personal injury, damage to the environment or personal property and can harm the reputation of Diamond Aircraft.

Diamond Aircraft's managers are responsible for adequate and prompt incident response in accordance with the relevant procedures, as well as for the continuous improvement of health and safety strategy and procedures.

Environment and Sustainability

- ◆ *We promote the careful use of resources.*
- ◆ *We seek to minimize negative impacts on the environment.*
- ◆ *We are committed to the region in which we operate.*

Compliance with legal and other requirements relating to avoidance of negative environmental impact is a matter of course at Diamond Aircraft. The production of Diamond Aircraft's products is inherently energy-intensive and a cause of emissions, however, Diamond Aircraft engages actively in environmental protection and sustainable management to minimize the negative environmental impacts of its operations. Diamond Aircraft takes great efforts to work as cautiously as possible with respect to energy and natural resources, and Diamond Aircraft pays particular attention to the aspect of recycling of residual materials in the development of new and the improvement of existing products. Finally, sustainability remains in Diamond Aircraft's focus also with regard to the development of new products.

Conflicts of Interest and Anti-Corruption

- ◆ *We separate private and professional interests.*
- ◆ *We disclose potential conflicts of interest.*
- ◆ *We refrain from corruption and avoid actions that could give the appearance of it.*

Any business decision made at Diamond Aircraft, and the resulting actions shall serve the interests of Diamond Aircraft and may not be influenced by personal interests or relationships. Therefore, Diamond Aircraft avoids compromising situations from the outset.

Diamond Aircraft stands for correct and fair business conduct and succeeds solely with the expertise of its staff and the quality of its products and services. It goes without saying, therefore, that Diamond Aircraft does not tolerate any form of bribery or corruption and that Diamond Aircraft adheres to applicable laws and regulations, in particular, but not limited to, the UK Bribery Act and the US Foreign Corrupt Practices Act.

It is strictly prohibited for all employees, agents, contractors and other staff working on behalf of Diamond Aircraft to offer, promise or grant, directly or indirectly, any advantage with the objective of obtaining an unlawful consideration. Likewise, demanding or accepting an advantage for oneself or for a third party for the provision of an unlawful consideration is prohibited. Even the appearance of any undue influence must be avoided.

Sanctions and Export Control Regulations

- ◆ *We do comply with sanctions and export control laws.*
- ◆ *We do not circumvent such sanctions.*
- ◆ *We consult with the export control manager in case of uncertainty.*

Many countries, and supranational bodies such as the United Nations or the European Union, have enacted rules and regulations to fight against terrorism, violation of human rights, human and drug trafficking, organized crime, and money laundering. These bodies imposed and impose numerous sanctions and embargos against countries, organizations, companies and individuals, import and export restrictions for particular goods and technologies, as well as prohibition of certain services and financial transactions. Diamond Aircraft complies with all applicable sanctions and export control regulations. Diamond Aircraft has established a robust business partner due diligence check, which is carried out during the onboarding and throughout the business relationship with business partners. Finally, Diamond Aircraft assesses all deliveries in conflict regions carefully under ethical considerations and on a case-by-case basis even if there are no legal restrictions.

Anti-trust and Fair Competition

- ✦ *We do not discuss or fix prices with competitors.*
- ✦ *We do not share sensitive information with competitors.*
- ✦ *We consult with the legal department in case of uncertainty.*

National and international regulation ensures that fair competition prevails, and no company generates an unlawful advantage over competitors by any agreement or mutual understanding whatsoever. Diamond Aircraft is committed to fair competition and business conduct with integrity. Diamond Aircraft complies with the applicable anti-trust and competition laws.

Any activities that restrict competition are therefore strictly prohibited. This includes but is not limited to:

- Entering into agreements, aligning behavior, or exchanging information with competitors about prices, terms and conditions, production or sales costs and quantities, sales strategies, allocation of customers or markets, non-provision of products and services.
- Provision of fictitious offers, discrimination of customers or suppliers, obtaining competitive knowledge through industrial espionage, theft, eavesdropping, or other illegal activities, or deliberately disseminating incorrect information about competitors.
- Fixing of resale prices or strategies and certain forms of exclusive arrangements with resellers.

Data Protection, Privacy and Information Security

- ✦ *We handle personal data responsibly.*
- ✦ *We protect our trade secrets and intellectual property.*
- ✦ *We maintain the functionality and integrity of our IT systems.*

Diamond Aircraft respects the right of privacy and other data protection principles and is committed to processing personal data lawfully, fairly, in a transparent manner and for a legitimate and limited purposes only. Diamond Aircraft complies with applicable privacy and data protection regulations, such as the EU General Data Protection Regulation (GDPR). All employees are required to adhere to the respective principles and to handle information and IT systems conscientiously and carefully. Careless handling may cause significant damage to Diamond Aircraft, its employees, or to third parties.

The protection of personal and business-related data, including confidential customer data, is of key importance for Diamond Aircraft. Ensuring the functionality and integrity of our information and communication systems are therefore top priorities.

Respect and Speak up culture

- ✦ *We promote and live a culture of integrity.*
- ✦ *We treat everyone with respect.*
- ✦ *We communicate openly and transparently.*

If you suspect or know of a serious violation of applicable laws and regulations, this Code of Conduct or other policies, report the incident – Do not look the other way. Diamond Aircraft provides multiple channels to raise concerns, which are also open to external stakeholders. As a rule, questions, proposals, problems, and grievances should be clarified with the direct supervisor first. In some situations, this may not be effective, or you might feel uncomfortable in addressing your concerns directly. If you recognize serious misconduct do not hesitate to report it. You may direct your concerns to HR, Compliance, Finance or Legal directly, the respective team will be happy to assist you. Diamond Aircraft is committed to maintain a culture in which our employees feel comfortable raising concerns about potential violations.

Compliance, Applicability and Implementation

- ✦ *We comply with the laws and regulations in the countries where we operate.*
- ✦ *We seek advice when we are in uncertainty.*
- ✦ *We refrain from doing business when in doubt.*

This Code of Conduct is applicable to all employees, executives of Diamond Aircraft, regardless of their position or type of employment. It summarizes the most important principles of ethical behavior. Further details and specific regulations applicable to all or only particular business units or geographical areas are contained in separate policies, process descriptions, or guidelines. Non-compliance with this Code of Conduct or other internal policies may have disciplinary or even legal consequences. Diamond Aircraft will not tolerate any illegal behavior and will penalize any attempt of infringement in accordance with applicable labor laws.

While every Diamond Aircraft employee is required to comply with this Code of Conduct, significant responsibility for compliance lies with our management and executives. It is one of their foremost duties to guide and to supervise their staff and team members in daily operations and to act as a role model.

In some situations, it may not be clear whether a particular behavior or action is legally and/or ethically correct. Sometimes detailed clarification of the conditions and circumstances is required. If you have any questions about the rules outlined in this Code of Conduct, or if you are not sure whether your (planned) decisions, procedures, or other activities are compliant, consult with your supervisor or seek advice from HR, Compliance, Finance, or the Legal team.



Diamond Aircraft Industries GmbH

N. A. Otto-Strasse 5, 2700 Wiener Neustadt, Austria
Phone: +43 2622 26700, office@diamondaircraft.com

www.diamondaircraft.com