# Code of Ethics
# Glenair GmbH

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**English version**

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## PREAMBLE

Glenair GmbH (hereinafter also "Glenair" or the "Company") is part of an international group of companies engaged in the development, manufacture and supply of electrical connection systems, both standard and customized components, connectors and accessories.

The Company specializes in offering a complete "range" of fiber optic systems, specialty connectors, micro connectors, circular connectors, termination housings, cable clamps, cabling tools and harnesses (also compliant with MIL standards), as well as its technical support in all major global markets.

The Company has ISO 9001 and EN 9100 certifications. It targets markets that encompass a variety of sectors (e.g., aviation, shipping, rail, aerospace, and telecommunications). Glenair makes large investments in research and development projects to promote new technologies, innovative material and specially trained personnel.

When conducting its operations, Glenair seeks to adhere to values and codes of conduct that enable the Company to operate effectively and transparently. This is also to prevent any misconduct or criminal acts committed by persons acting in Glenair's name and on Glenair's behalf.

The management has adopted this document (hereinafter the "Code of Ethics") to establish the principles of the Company. The Code of Ethics also explains the rights, duties and responsibilities that Glenair assumes towards individuals with whom it engages in business dealings. The Company expects all “recipients” of the Code of Ethics to strictly adhere to the principles listed.

For this purpose, the Company is committed to broadly distribute the Code of Ethics and to ensure an adequate training program for its content.

## Chapter I
## GENERAL PROVISIONS

### 1. SCOPE AND RECIPIENT OF THE CODE OF ETHICS

1.1 The principles, values and commitments set out in this Code of Ethics aim to guide the activities of all individuals who, in various capacities and with various responsibilities, contribute directly or indirectly to the achievement of Glenair's vision and mission.

1.2 The principles and values set forth in the Code of Ethics are therefore intended to extend to all persons who hold representative, administrative or managerial positions within the Company. This also applies to employees who exercise de facto management roles or control due to group and work dynamics or professional experience. In addition, the Code of Ethics is addressed to all persons who cooperate with Glenair. This includes service providers, business partners and anyone who maintains business relationships with the Company. Hereinafter, the groups of people listed are referred to as "recipients." In this context, the term "recipient" is understood to be gender-neutral (i.e., m/f/d).

1.3 All recipients are required to comply with the principles contained in the Code of Ethics and to enforce them as far as their competence allows. The personal belief that one is acting in the best interests of the Company in no way justifies acting in a manner that deviates from the laws, regulations and guidelines set forth herein and generally applicable to the Company.

1.4 Glenair undertakes to disseminate this Code of Ethics to all interested parties, to provide truthful information about its content and to provide tools that facilitate its application. Further, Glenair pledges to inform customers, suppliers and other third parties who establish business relationships with the Company about the Code of Ethics.

1.5 Glenair takes the necessary steps to conduct its own review and monitoring of the implementation of the Code of Ethics. The Company specifies sanctions for violations of the Code of Ethics.

## Chapter II
## PRINCIPLES

### 2. PRINCIPLES

2.1 The Company accepts and shares the ethical principles listed below (hereinafter referred to as the "Principles"):

- Legality;
- Fighting corruption;
- Avoiding conflicts of interest;
- Professionalism and reliability;
- Transparency and accuracy in dealing with company information;
- Confidentiality;
- Appreciation of the individual and the staff;
- Correctness in contractual matters;
- Protecting occupational safety and the environment;
- Prevention of money laundering;
- Protection of competition;
- Protection of industrial and intellectual property.

2.2 The recipients align their behavior with the principles. Under no circumstances can a personal belief, to act in the interest or in favor of Glenair justify behavior that goes against these principles.

### 3. LEGALITY

3.1 All conduct of recipients during work activities performed on behalf of or in the interest of the Company is subject to strict compliance with applicable national, EU and international laws.

3.2 Each employee of the Company must undertake to comply with applicable laws and regulations. This obligation must also apply to consultants, employees, suppliers, customers and all persons related to the Company. For Glenair, compliance with the law is the basis for achieving its corporate objectives. Therefore, the Company will not establish or continue relationships with persons who do not intend to adhere to this principle.

3.3 The responsibility for the Company's compliance with legal requirements must be clearly defined. A manager is responsible for assigning this responsibility. The responsible manager bases this on the task and position description of the employees concerned. Furthermore, every employee is generally obliged to comply with legal regulations.

3.4 Recipients who become aware of company-related violations of legal regulations or the provisions of this Code of Ethics must immediately notify a supervisory body or management. This also applies to cases where there is doubt or further need for clarification with regard to compliance with and interpretation of the Code of Ethics. All cases that potentially involve Glenair's participation are considered to be company related.

## 4. FIGHTING CORRUPTION

4.1 Relationships with customers, consultants and suppliers, as well as with all types of business partners of the Company, are based on appropriateness, cooperation, loyalty, honesty and mutual respect.

4.2 Recipients who represent the Company, act in its interest or have business relations with it must refrain from any form of corruption. This applies to both contact with public and private institutions.

4.3 Glenair does not permit any payment or benefit to be made to customers, business partners and third parties in general that is not strictly derived from a contractual obligation or a contractually regulated business relationship.

4.4 The Company also expects its customers, suppliers and other partners to share and act in accordance with these principles.

4.5 Employees of the Company may accept or offer gifts, provided that these are directly related to the activity carried out. In addition, gifts are only legitimate if they do not create an obligation or sense of obligation on either side. They must be of modest value and must be transparent and explicitly declared as a gift. Gifts may only be given occasionally or on the usual occasions involving the exchange of gifts.

## 5. AVOIDING CONFLICTS OF INTEREST

5.1 In conducting corporate activities and making the related decisions, recipients shall act impartially in the best interests of Glenair. Their decisions are made responsibly, transparently and according to objective evaluation criteria. In doing so, they avoid situations in which they could expose themselves to a conflict of interest or indicate such a conflict of interest.

5.2 "Conflicts of Interest" are instances where a recipient pursues personal ambitions or the interests of third parties in place of Glenair's business interests. Further, a "conflict of interest" means engaging in activities that interfere with the recipient's ability to make decisions solely in the interest of the Company. This includes cases where recipients take personal advantage of Company business opportunities.

5.3 For example, but not limited to, the following situations may result in a conflict of interest:

- the pursuit of personal economic and financial interests, for example through separate contact with suppliers, competitors or the involvement of family members;
- exploiting one's own position to achieve personal interests that are contrary to those of the Company;
- entering into, concluding or initiating their own negotiations and/or contracts – in the name of and/or on behalf of the Company – involving family members, or legal entities of which the recipient is the owner or in which the recipient has an interest in any case;
- performing work activities on behalf of customers, suppliers, competitors and/or third parties of any kind contrary to the interests of the Company and/or the agreements applicable thereto, except in cases permitted by law and/or authorized by the Company;

- taking personal advantage of information and business opportunities that have become known to recipients during the performance of their duties.

5.4 In the event of a potential or actual conflict of interest, recipients shall inform their superiors/contact persons and the supervisory body or management immediately. In doing so, they provide information about the situation or activities through which their own interests or the interests of close relatives conflict with those of the Company. This also applies to all other cases in which there are relevant reasons for the purpose and the risk of a conflict of interest.

5.5 Recipients who come into a conflict of interest should avoid participating directly or indirectly in relevant decisions and solutions. They must ensure neutrality through not exploiting their own position in the Company, their economic activities and internal commitments for the benefit of personal or family interests.

## 6. PROFESSIONALISM AND RELIABILITY

6.1 Glenair conducts its business in accordance with high standards of ethical professional conduct. All activities performed for the Company must be carried out with great professional commitment, moral clarity and propriety, also to protect the Company's reputation.

6.2 The recipients are obliged to carry out the activities of their area of competence carefully, professionally and reliably. They perform their duties with a sense of duty appropriate to the responsibilities assigned to them and to protect Glenair's reputation.

6.3 Glenair requires recipients to act loyally and in good faith, in a spirit of mutual respect, for the benefit of a successful working relationship and to fulfill their contractual obligations and required services.

## 7. TRANSPARENCY AND ACCURACY IN DEALING WITH COMPANY INFORMATION

7.1 The Company ensures a high level of transparency on management processes, including complete accounting information properly prepared and made available to any audits. When documenting management and accounting operations, the company specifies all the criteria on which the evaluation of business operations was based.

7.2 In accordance with the principle of transparency, each operation and transaction must be correctly recorded, authorized, verifiable, legitimate, consistent and congruent. All information that goes into accounting (both general and analytical) must comply with the principles of clarity, transparency, correctness, completeness and accuracy.

7.3 Each task performed should be adequately documented. Such documentation makes it possible to carry out audits at any time in order to record the details and reasons for completed operations. It also shows who has approved, executed, recorded and reviewed each operation. All information related to operational processes must be recorded accurately and in a timely manner in the accounting department or in the corresponding specialist departments.

7.4 In order for accounting documentation to meet the requirements of truthfulness, completeness, accuracy and transparency of recorded data, adequate and complete supporting documentation for each accounting transaction is maintained in the Company's records. These permit:

- accurate and truthful accounting documentation;
- an immediate identification of the characteristics and reasons underlying the transaction;
- a straightforward reconstruction of the operational and decision-making process and identification of responsibilities.

7.5 Each accounting record must accurately reflect the outcome of the related supporting documents. It is therefore necessary that the supporting documents are carefully kept in order to be readily available.

7.6 In the management and implementation of social activities, it is necessary to provide transparent, truthful, complete and accurate information (also with respect to the outside world). In doing so, the dissemination of false information and the performance of faked activities must be refrained from.

7.7 Each recipient is required to report immediately to their supervisor or management any omission, inaccuracy or falsification in accounting records or supporting documents of which they have become aware.

## 8. CONFIDENTIALITY

8.1 The Company guarantees the confidentiality of information concerning the Company's assets, even if it relates to third parties. This is done in strict compliance with applicable legislation and for the protection of personal data.

8.2 The duty of confidentiality extends not only to company data and the management methods of business processes, but also to information about customers, experts, suppliers and business partners.

8.3 Recipients must ensure the confidentiality of the information to which they have access or which they have processed in the course of their tasks at work, even if this information is not expressly classified as confidential.

No recipient may derive any direct or indirect benefit from the use of confidential information or personal data obtained in the course of activities carried out of the company. Furthermore, this information may not be disclosed to others, nor may its use be encouraged or recommended.

8.4 No recipient may directly or indirectly derive any benefit from the use of confidential information or personal data obtained in the course of the activities carried out for the Company. In addition, they may not pass on this information to others, nor may they initiate or recommend its use.

8.5 Confidential information is passed on to third parties exclusively by authorized staff. If information is passed on to third parties for work-related reasons, it must be expressly pointed out that the information is confidential and compliance with the confidentiality agreement must be demanded from the third party in question.

8.6 The obligation of confidentiality of information also applies to persons with whom the Company has contractual or other relationships. The company also undertakes to protect the information of employees and third parties and to avoid its misuse.

8.7 Passwords and data encryption systems that protect electronic information must be known only to authorized individuals, who are required to keep them carefully and not disclose them.

## 9. APPRECIATION OF INDIVIDUALITY AND THE STAFF

9.1 The Company believes that its staff is its most important asset and uses procedures and methods of selection, recruitment, training and management based on respect for the human values, rights and duties of employees, promoting their development and professional growth.

9.2 It is Glenair's desire and goal to provide a healthy and safe work environment to facilitate the performance of assigned duties and tasks and to enhance the job skills of each individual. This also concerns the involvement and empowerment of employees with regard to their specific tasks, as well as addressing what goals can be achieved and how they can be pursued.

9.3 Personnel are an indispensable and valuable asset to Glenair for the development and growth of the market segment in which it operates. The Company therefore protects the value of the human being and does not tolerate discriminatory behavior, harassment and personal insults.

9.4 To this end, the Company encourages organizing work based on respect for each individual's personality and dignity, including in the selection of personnel, and preventing situations of discomfort, hostility or intimidation from arising at any time.

9.5 In addition, the Company promotes the indispensable protection of individual freedom and personality. It rejects any activity that could involve a possible exploitation or degradation of the individual into a state of submission.

9.6 Glenair is committed to ensuring that harassment or discriminatory conduct based on age, gender, sexual orientation, race, color, language, nationality, political views does not occur in the workplace and in the performance of all company activities, religious beliefs, marital and family status, disabilities, genetic information or other personal characteristics, are not relevant to the job.

9.7 In the selection and management of staff, the Company is guided by the criteria of equal opportunity, merit and promotion of the abilities, skills and potential of the individual. It undertakes to ensure that authority or competence is exercised fairly and correctly and that any form of abuse is avoided.

9.8 The Company guarantees the correct fulfillment of all legal obligations that aim at ensuring the correct remuneration and premium handling of the personnel by the employer. This also applies to enabling employees from countries outside the European Union to legally reside in the country.

## 10. CONTRACTUAL FAIRNESS

10.1 Contracts must be drawn up in compliance with the applicable regulations and jobs must be executed in accordance with the deliberate specifications of the contracting parties. The Company is committed to ensuring timely and comprehensive information on all matters relating to its business. Furthermore, Glenair assures not to take advantage of favorable situations due to lack of information or knowledge of the contracting parties. This implies full compliance with the legal provisions on the processing of personal data.

## 11. PROTECTION OF OCCUPATIONAL SAFETY AND THE ENVIRONMENT

11.1 Glenair promotes the health and safety of its employees and all persons entering the offices or work area. Based on the established technical-scientific recommendations, necessary and appropriate measures are taken to ensure compliance with safety and hygiene standards in the workplace.

11.2 The Company is committed to ensuring working conditions that honor the dignity of the individual. This includes a safe and healthy working environment based on spreading a culture of safety and risk awareness. Glenair promotes responsible behavior. This is done through training activities as well, in accordance with company procedures and current accident prevention regulations.

11.3 Glenair's ongoing goal is to promote measures that ensure the protection of health and safety in the workplace. This pertains to the design phase of work processes and production activities, the implementation of safety-specific improvements, and the identification of opportunities for improvement, control, and reduction in the use of hazardous substances.

11.4 Each recipient is called upon to maintain the safety of their work environment and to behave responsibly in order to protect the health and safety of themselves and others.

11.5 In managing its business activities, Glenair takes significant account of environmental protection and seeks to improve the environmental conditions of the community in which it operates, in full compliance with applicable legislation.

11.6 Glenair recognizes that environmental protection is of great importance. For this reason, the Company strives to plan its activities in such a way that they strike a balance between economic initiative and the essential needs of environmental protection. Glenair's specific goals are to improve its energy efficiency/savings, promote sustainable development, and ensure the proper application of the technologies used to mitigate the associated environmental impacts.

11.7 The Company promotes measures to control emissions into the atmosphere and to ensure the selective collection, recycling and correct disposal of waste. It pays particular attention to the selection of service providers in the field of waste management.

11.8 The Company is aware of the impact of its activities on economic and social development as well as on the quality of life at the location and intends to conduct its activities and investments in an environmentally responsible manner and to ensure full and comprehensive communication with the community, in full compliance with current legislation.

11.9 Employees working for the Company are instructed to use recyclable materials and to adapt their individual behavior in favor of energy conservation and sustainable waste management.

## 12. PREVENTION OF MONEY LAUNDERING

12.1 The Company's commitments to correctness, transparency and honesty mean that business transactions and relationships with third parties must be fully traceable, in full compliance with national and international anti-money laundering regulations.

12.2 All financial transactions, including those within the group, are adequately justified in the contractual relationships and processed using means of payment that ensure their traceability.

12.3 The Company prohibits any conduct aimed at using, replacing, transferring or in any way concealing funds whose illegal origin is known or suspected, whether within or outside Glenair. Consequently, on behalf of the Company, recipients may not enter into business relationships with partners, customers, suppliers or third parties who do not provide guarantees of integrity, do not enjoy a good reputation, or whose names are associated with incidents related to money laundering.

## 13. COMPETITION

13.1 The Company believes in healthy and fair competition as well as a competitive market. It acts in accordance with antitrust law to ensure free, distortion-free and effective competition for the benefit of competitors, customers and the Company itself. Therefore, fraudulent conduct, agreements or arrangements between current or potential competitors that could involve forms of unfair competition or violations of applicable antitrust laws are prohibited.

13.2 The Company agrees not to use improper means, such as industrial espionage, to solicit employees of competitors, obtain confidential information, or encourage competing employees to disclose confidential information about their company.

13.3 In this sense, recipients are prohibited from discussing with competiors´prices or other business conditions, allocation of markets, customers or territories, business opportunities or order intake, capacities, production volumes or quotas, business strategies, sales and tenders.

## 14. PROTECTION OF COMMERCIAL AND INTELLECTUAL PROPERTY

14.1 The Company, implementing the principle of legality, ensures compliance with internal, common and international rules on the protection of industrial and intellectual property.

14.2 Glenair guarantees compliance with legislation on the protection of trademarks, patents and other distinctive signs, as well as copyright. The Company prohibits unlawful conduct generally aimed at the replication or reproduction of the work of others in any form and without right.

## Chapter III
## RELATIONSHIPS WITH EMPLOYEES

### 15. INTRODUCTION

15.1 For the company, the recognition of employees is a significant factor for motivation and satisfaction within the organizational areas. Regular feedback and recognition for good performance not only promotes commitment but also strengthens trust between managers and employees. An encouraging working environment helps to reduce staff fluctuation and increase employee loyalty, which also increases the company's productivity and sustainability in the long term. Specific employee appreciation measures, such as company events or other incentives, create a positive working atmosphere that promotes creativity and innovation. Finally, employee appreciation is not only a question of corporate culture, but also a strategic investment in the long-term success of the company.

15.2 The employment relationship is designed to promote the professional development and skills of each individual employee. This also includes the specific use of incentive instruments to further increase the commitment and motivation of employees and support their professional objectives.

15.3 The Company focuses its human resources policy on the development of individual work skills of employees as well as the needs of the respective job requirements in order to fully pursue and achieve the Company's objectives.

15.4 The Company uses the principle of delegation of responsibility, which is carried out through a general and/or special power of attorney, as well as the delegation of duties. This ensures the transfer of authority and functions to individual employees. It also ensure, that the legally responsible persons are present in the various company operations, thus fulfilling their supervisory duty/authority.

### 16. EMPLOYEE SELECTION

16.1 Personnel selection is carried out by verifying the candidates' alignment with the required job profiles. In doing so, the Company considers the preservation of equal opportunities for the interested parties. Glenair complies with all legal requirements that apply in this regard.

16.2 The Company shall take appropriate measures, within the limits of the information available, to avoid favoritism or nepotism or forms of patronage in the selection and recruitment phase.

16.3 The Company undertakes to ensure, when assessing personnel, to define the timeframe for individual annual or interim objectives and to link their success to concrete (measurable) results.

16.4 Any form of harassment committed based on a person’s race, religion, belief, ethnicity, national origin, and color is strictly prohibited. Glenair has a zero-tolerance approach to this type of behavior and accusations of racial harassment will be dealt with under the Company’s Disciplinary Policy.

16.5 The Company will not tolerate any form of harassment of its workforce by third parties (e.g. customers, suppliers or members of the public). Appropriate action will be taken to deal with those who subject any of the Company's employees to any form of harassment. Employees who feel that they have suffered harassment by a third party should report this to their Line Manager/Department Head or with the Human Resources Manager in the first instance.

## 17. EMPLOYEE RECRUITMENT

17.1 Employees are recruited on the basis of regular employment contracts.

17.2 At the beginning of the employment relationship, each employee receives information about:

- Glenair Culture;
- characteristics of the role and duties to be performed;
- rules and remuneration;
- rules and procedures to avoid possible health risks related to work activities.

17.3 The information is communicated to the individual in a manner that provides a clear basis of understanding for accepting the offer of employment.

## 18. EMPLOYEE TRAINING

18.1 The Company values employee training as an important contribution and investment in the future. Managers ensure the necessary resources and appropriate tools are in place to achieve the training objectives set. Special attention is paid to health and safety at work, the protection of personal data, environmental protection and the guiding principles of this Code of Ethics.

18.2 The Company provides its employees with appropriate information and training tools. Depending on the type of training, this can also be distance learning. The Company's goal is to improve the specific skills of its personnel and maintain their professional value.

18.3 Training is assigned to individuals or groups. The selection is based on the specific professional development needs of the employees concerned. A training plan ensures that the employee receives appropriate training both at the time of recruitment and during career transitions, job changes, etc.

## 19. INVOLVEMENT OF EMPLOYEES

19.1 Glenair ensures employee participation in the Company's operations by providing information and creating spaces to participate in discussions for continuous improvement. This exchange is intended to promote a culture of innovation and the achievement of corporate goals and to optimize the execution of work processes.

19.2 The employees who use the discussion spaces provided (such as exchange forums, discussion or meeting rooms or dialog platforms), must do so with independent judgment and in a spirit of cooperation, trust and friendship.

19.3 Sharing different points of view that are compatible with the needs of the company allows leaders to formulate final decisions. Employees are obliged to actively contribute to the implementation of the agreed measures.

## 20. HEALTH AND SAFETY

20.1 The Company is committed to providing a work environment that protects the health and safety of employees. Glenair views this commitment as an investment and as a factor of growth and added value for the Company itself.

20.2 Glenair is committed to protecting the moral and physical integrity of its employees, consultants and all of its business partners.

20.3 To ensure the physical integrity of employees, consultants and business partners, Glenair promotes responsible and safe behavior. Glenair takes all necessary safety measures to create a safe and healthy working environment. Furthermore, Glenair considers technological progress and makes adjustments as required. Glenair acts in full compliance with the applicable legislation on prevention and protection and prevention of violations of statutory accident prevention regulations, industrial hygiene and health protection.

20.4 The Company shall ensure compliance with all related legal obligations:

- compliance with the technical-structural regulations regarding equipment, facilities, workplaces, chemical, physical and biological agents;
- risk assessment activities and preparation of appropriate preventive and protective measures;
- organizational activities such as emergencies, first aid and procurement management, regular safety meetings;
- occupational health and safety measures;
- informing and training employees;
- supervisory activities related to compliance with safe work procedures and instructions;
- the procurement of mandatory legal documentation and certifications;
- regular checks on the application and effectiveness of the procedures used.

20.5 The Company ensures the preparation of functions that ensure the technical capabilities and authorizations required to review, assess, manage and control risks.

20.6 Regarding occupational health and safety, decisions must be made, taken and implemented at both the operational and senior levels of the Company based on the following basic principles and criteria:

- avoid risks;
- assess the risks that cannot be avoided;
- combat risks at source;
- adapt work to people, in particular with regard to the design of workplaces and the choice of work equipment as well as work and production methods, inter alia, to reduce monotonous and repetitive work and to reduce the impact of this work on health;

- take into account the state of technical development;
- replace hazardous things with non-hazardous or less hazardous things;
- plan preventive measures with the aim of creating a suitable environment, taking into account technology, work organization, working conditions, social relations and influencing factors in the work environment;
- give collective protection measures priority over individual protection measures;
- give appropriate instructions to employees.

20.7 The Company commits to communicating a corporate culture of safety with regard to prevention, the development of risk awareness, and the promotion of responsible behavior by all individuals. Glenair also determines which individuals are provided with appropriate information and training to ensure full and timely compliance with the rules and internal procedures. The relevant trained personnel are requested to report any defects or non-compliance with applicable regulations immediately.

20.8 The Company's goal is to protect personnel and promote synergies. This applies not only to internal processes, but also to contact with suppliers, other companies and customers involved in Glenair's activities. Furthermore, in this regard, Glenair strives to constantly improve its management structures or organizational units in order to effectively achieve its set objectives.

20.9 The Company maintains a catalog of measures to continuously improve security and risk management. The catalog is based on the development of benchmark scenarios, the resulting changes in the production cycle and the organizational structure. It includes:

- the introduction of an integrated risk and safety management system;
- a continuous analysis of the risk of critical processes or resources;
- the introduction of state-of-the-art technologies;
- the monitoring and updating of the working methods;
- the implementation of training and communication programs.

20.10 In the application of occupational health and safety regulations, the Company follows these guidelines in particular:

- The Company intends to implement the regulations for the protection of health and safety at work effectively and apply them in its organizational and functional structure, with the aim of systematically reducing the risks to personnel in terms of accidents and occupational diseases. The Company evaluates this as a strategic objective that it wishes to pursue with a desire to continuously improve its operations management. The goal is to synergize with the optimization of operations, resource efficiency and improvement of profitability.
- The Company uses a risk assessment document as a reference tool for its preventive activities and develops safety procedures, operating instructions, training programs and personnel training based on the specifications made in the document. The risk assessment document is subject to constant updating by the help and support of qualified and appropriate resources, distinguished by competence, experience and ability to the required extent.
- The risk prevention and protection service is managed in accordance with established objectives, ensuring adequate economic, financial and human resources are maintained over time. In all cases where the company does not have sufficient resources, it falls back on external expertise.

## 21. PROTECTION OF Personal Data

21.1 We process the personal data of our employees in accordance with the General Data Protection Regulation (Regulation (EU) No. 2016/679 - "GDPR") and supplementary national regulations, in Germany specifically the Federal Data Protection Act (BDSG).

21.2 Data protection is an integral part of our management system, not a mere formality tacked on afterward. Responsibilities and procedures are defined in internal policies and work instructions. All employees receive regular training, comply with these guidelines, and immediately report data protection incidents or suspected incidents (Data Protection Officer / Reporting Office: datenschutz@glenair.de).

21.3 Before we collect data, we inform the data subjects in clear and simple language (privacy notice pursuant to Article 13 and 14 of the GDPR). It includes:

- who is responsible and how to contact our data protection officer;
- what categories of personal of personal data we process and – if the data was not collected directly from the individual – where it comes from;
- for what purposes and on what legal basis we process them
- who receives the data and whether it is transferred to a country outside the EU/EEA
- how long we store the data or what criteria determine the duration
- What rights you have—access, rectification, erasure, restriction, data portability, and objection—and how to exercise them
- the right to withdraw consent at any time with future effect, and the right to file a complaint with a supervisory authority
- whether the provision of the data is required and what the consequences are if it is not provided
- whether automated decisions, including profiling, are made.

21.4 We generally process employee data on a legal basis or in accordance with collective bargaining agreements. We obtain consent only when no other legal basis applies, for example, for voluntary additional offers or for photos used in public relations. Consent is voluntary, is given in writing or electronically, and may be revoked at any time with future effect. Anyone who does not grant consent or who revokes it will not suffer any disadvantages as a result.

## 22. OBLIGATIONS OF EMPLOYEES

22.1 Employees must act loyally to comply with their employment contract obligations and the guidelines of this Code of Ethics. This includes ensuring the required or mandated activities, complying with the law while performing their duties, and aligning their conduct with ethical principles such as integrity, fairness, loyalty, and trust.

22.2 Employees are obliged to maintain the confidentiality of company information at all times.

22.3 Company information and know-how must be protected with the utmost confidentiality. Data that the company acquires or generates in the course of its business activities is considered confidential information and must be treated with due care. This also includes information obtained from and about third parties (customers, professional contacts, business partners, employees, etc.). Employees shall ensure that the data processed by the company, including

22.4 personal data, is “secure”. This means that the data is collected and processed lawfully, in compliance with the information provided to the data subjects and any consents obtained.

22.5 Use of Company assets:

Each recipient is obliged to protect corporate assets through responsible conduct and in accordance with the operational procedures established for its use. The use of Company assets must be accurately documented. In particular, recipients must:

- handle the assets entrusted to them conscientiously and sparingly;
- protect and preserve the assets entrusted to them by the Company in the course of its business; they should use them appropriately and in accordance with the public interest by adopting behaviors that appropriately prevent misuse by third parties;
- avoid misuse of company assets that may result in damage or loss of efficiency or in any case be contrary to the interests of the Company;
- protect the assets and inform the relevant departments immediately about threats or events that harm the Company.

With regard to IT applications, each person is obliged to:

- Scrupulously follow the provisions of the corporate security policies in order not to jeopardize the functionality and protection of the IT systems;
- Refrain from sending threatening or abusive email messages or using unsuitable language or making inappropriate comments that could offend people and/or damage the Company's reputation;
- Refrain from surfing on websites with offensive and insulting content.

The Company reserves the right to prevent the improper or incorrect use of its assets, whether through the use of accounting, reporting, financial control and risk analysis and prevention systems, without compromising compliance with the provisions of applicable laws (Data Protection Act, Workers' Statute, etc.) and ensuring that the personnel concerned are informed in advance.

The following applies to each recipient:

- Do not use company resources or IT equipment provided for work purposes for personal interests or purposes. Every employee is responsible for the security of the IT systems they use. Legal provisions, the terms of license agreements, and internal company policies apply and must be strictly adhered to.
- Subject to civil and criminal law, the use of network connections for purposes other than those related to the employment relationship is part of the misuse of Company assets and resources.
- To make the necessary efforts to prevent possible perpetration
  crimes through the use of IT tools.

22.6 Gifts, presents and other benefits:

It is not permitted to personally offer or accept money, gifts, vouchers or benefits of any kind, directly or indirectly, to third parties (public administration, associations, other organizations of a similar nature, customers, suppliers, etc.) with the aim of giving themselves and the company an unjustified advantage and thereby influencing the independent judgment of the recipient. Commercial acts of courtesy such as gifts or forms of hospitality are permitted as

long as they are in line with typical company practice. This includes gifts or entertainment that do not appear to be intended to influence the independent judgment of the recipient. Such actions should remain within reasonable bounds and must not be interpreted as a quid pro quo for a specific action or decision. Expensive gifts, vouchers or invitations, especially those that could be considered a bribe, are not permitted.

22.7 Obligation to inform:

Each employee is obliged to immediately and confidentially report to the respective department head and/or management any information that has become known to them in the course of their work regarding violations of legal regulations, the Code of Ethics or other company regulations. Managers must monitor the activities of their employees and inform the senior management continuously and promptly in the event of violations.

To ensure that we meet the highest ethical standards, we encourage to report any possible wrongdoing in confidence. Our whistleblower e-mail address is provided for this purpose: whistleblower-hotline@glenair.de

We guarantee absolute discretion and anonymity. The identity will only be disclosed if this is explicitly requested. To ensure effective processing, we ask to provide as much detail as possible. The more precise the information, the better we can respond appropriately.

22.8 Abstention Obligations:

Employees and partners of Glenair must avoid any abuse of their position in private relationships with the aim of obtaining unjustified advantages for themselves or others. All employees of the Company are obliged not to take personal advantage of business opportunities that become known to them in the course of carrying out their activities. Every employee must refrain from behaviors and decisions that could directly or indirectly benefit their personal interests.

It is also imperative to refrain from publicly presenting Glenair's image in a form that is harmful and could arouse suspicion towards Glenair. Situations that may result in a conflict of interest, such as, but not limited to, those identifiable in the following situations, are expressly prohibited:

- independently carrying out an activity in competition with that of the Company, including through family members;
- having personal economic interests with suppliers, customers or competitors;
- accepting money or favors from persons or companies who have entered into an agreement or intend to enter into business relations with the Company;
- accepting gifts or gratuities that have more than merely symbolic value from suppliers, customers, or other entities with whom they have a professional relationship.

Should it even appear that a conflict of interest exists, the individual is required to disclose this to his or her manager and provide information about this apparent conflict, whether within the Glenair organization or outside the Company.

## Chapter IV
## RELATIONSHIPS WITH PUBLIC AUTHORITIES

### 23. INTRODUCTION

23.1 Relations with public administrations (also: government offices and authorities), central and peripheral, domestic and/or foreign, with public officials, with domestic or foreign civil servants, with independent administrative authorities, with associated companies, with municipal companies and, in any case, any relationship of a public nature, are based on the strictest compliance with the applicable legal provisions and the principles of transparency, honesty and fairness.

23.2 Attention and care must be taken, for example, in processes related to tenders, contracts, permits, licenses, concessions, applications and/or the management and use of loans of public (national and European) origin. Regardless of their more precise designation, this generally applies to contact with supervisory authorities and other independent authorities, representatives of public administrations, social security institutions, tax offices, etc.

23.3 In particular, the recipients must in turn:

- ensure that relationships with public officials are managed exclusively by persons with appropriate authority and that these relationships are conducted in accordance with applicable laws, regulations, and principles of loyalty and propriety;
- perform the obligations to the public administration with the utmost care and professionalism in order to provide clear, accurate, complete and truthful information and to avoid and report situations of conflict of interest;
- ensure that the documents to be sent to the public administration are prepared by the identified persons responsible for the matter and shared with their supervisor prior to sending;
- ensure confidentiality in the transmission of information;
- use communication channels with the public administration that enable subsequent traceability/formalization of the information sent and/or received;
- guarantee the legality, correctness and transparency of all relations with public officials, civil servants and representatives of public administrations in general, ensuring that the transmission of the documentation of necessary data is always carried out, supporting information provided and making decisions;
- ensure that procedures related to the application, issuance and maintenance of licenses, permits or concessions, as well as relationships in general with public authorities, judicial, inspection and regulatory functions, are managed exclusively by competent parties, based on legality, transparency, cooperation and fairness.

23.4 In their reports, the recipients shall not unduly influence the decisions of the officials negotiating or deciding on behalf of the public administration. They must refrain from any conduct that could jeopardize the impartiality and independence of the judgment of the public administration.

23.5 Recipients are therefore prohibited from:

- granting any request for money or other benefits from, paying, or authorizing anyone to pay, directly or indirectly, any amount of money, other benefits, advantages or anything of value to any public official, as well as offering to make payments to them in order to

improperly promote or favor the Company's interests or, in any case, in violation of applicable law;

- providing services or making payments for the benefit of employees, suppliers, consultants, partners or other third parties working on behalf of Glenair with the public administration or independent administrative authorities, if they are not duly justified in the contractual relationship entered into with them or in relation to the nature of the contract to be performed and the applicable local customs;
- resorting to other forms of assistance or gratuity (gifts, commissions, advice, support, etc.) that have the same purposes as those prohibited in the previous item;
- exerting undue pressure and influence on public officials and officers and their families to provide special benefits to the Company in the performance of their duties;
- engaging in fraudulent behavior that could generate a technical and economic error in the assessment of the documentation submitted to public administrations;
- providing untrue declarations and/or powers of attorney, by submitting documents that do not fully correspond to reality;
- misrepresenting or persuading others to do so;
- misleading public officials in order to lead them into making errors of judgement when analyzing permit requests and the like.

23.6 It is expressly prohibited to use documents that contain untrue information or omit relevant information in order to improve relations with the public administration in its favor or to obtain national or EU contributions or financing in the interest of the Company. It is not permitted to use public grants received for purposes other than those for which they are intended.

## 24. HANDLING OF COMMUNICATION WITH PUBLIC AUTHORITIES

24.1 For communication with the public administration, the Company undertakes to operate correctly and impartially through the relevant corporate communication channels, to represent the interests and positions of the Company in a truthful, transparent and consistent manner and to avoid any disclosure of information or untrue, incomplete or misleading statements that could give Glenair an unreasonable advantage.

24.2 In the event that the documents to be sent to the public administration are prepared in whole or in part with the support of third parties (consultants, experts, technicians, etc.), the Company is obliged to ensure that their selection is always made in compliance with the requirements of professionalism, independence and competence.

## 25. HANDLING OF INSPECTIONS

25.1 The Company intends to facilitate the correct performance of inspections by bodies or authorities provided for by law.

25.2 Authorized employees will support any inspection visits by the supervisory or judicial authority in a spirit of cooperation, fairness and transparency. It is strictly forbidden to obstruct the proper execution of the inspection activity by hiding or destroying documents.

## Chapter V
## RELATIONSHIPS WITH THIRD PARTIES

### 26. RELATIONSHIPS WITH CUSTOMERS, SUPPLIERS AND BUSINESS PARTNERS

26.1 Glenair strives to satisfy its customers by offering high-quality products, ensuring their availability and guaranteeing immediate response to existing or emerging needs.

26.2 Our company is committed to strictly rejecting child labor in any form. We are committed to ensuring that all our business practices and supply chains comply with international standards that prohibit child labor. We only work with partners and suppliers who share our values and respect the rights of children. Our goal is to promote a safe and equitable future for all children by providing them with more access to education and healthy opportunities. The recipients are obliged to immediately report any violations (including imminent violations) to the company in writing.

26.3 The selection of suppliers and partners and the definition of the associated purchasing conditions are left to the responsible company departments, which act on the basis of objective and impartial criteria. These are primarily based on the assessment of reliability, quality, technical preparedness, efficiency and cost-effectiveness.

26.4 The following criteria in particular are used in the selection of suppliers:

- objective assessment of the quality and performance of the supplier and guarantee of the goods, services and services at an appropriate level;
- appropriate review of documented availability of funds, including financial, organized structure, technical knowledge, skills, and resources related to the engagement to be performed;
- verification of the professionalism of the business partner.

26.5 Recipients are also required not to exclude anyone who meets the necessary requirements from competing for contracts. Objective and verifiable criteria are applied when selecting potential candidates.

26.6 In any case, the Company requires that suppliers and employees comply with all applicable laws, including, for example, labor laws relating to the safety at work, minimum wages, overtime pay, recruitment and safety at work.

26.7 The selection of business partners is also based on criteria of ethics, reliability, good reputation, credibility in the respective market and dependability.

26.8 The Company will refrain from any relationship with any person who is known or has reason to believe to be a supporter of any criminal organization of any kind or nature.

## 27. RELATIONSHIPS WITH EXTERNAL PARTNERS/CONSULTANTS

27.1 The Company may terminate any business relationship with external partners/consultants with immediate effect if they do not agree to abide by the Code of Ethics.

27.2 A recipient who becomes aware of conduct by an external partner/consultant that does not comply with this Code is required to notify management straight away.

## 28. RELATIONSHIPS WITH INSTITUTIONS AND ORGANISATIONS

28.1 Relationships with institutions are established on the basis of the utmost care, transparency and propriety in accordance with institutional roles.

28.2 The Company supports initiatives of organizations with a proven reputation and for worthy purposes (e.g. social, moral, scientific, cultural, charitable or solidarity purposes) that can contribute to the growth and development of the Company.

28.3 Inadmissible, on the other hand, are direct or indirect donations to political parties, cultural or charitable institutions, politicians/political candidates or to events with a political purpose that are aimed at obtaining material, commercial or personal benefits.

28.4 Glenair rejects any relationship with national or foreign organizations, associations or movements that directly or indirectly pursue purposes prohibited by law, violate ethics or public order, or violate the fundamental rights of any person.

# Chapter VI
# SANCTIONS AND FINAL PROVISIONS

## 29. THE ROLE OF SENIOR LEADERSHIP

29.1 With the approval of the organizational, management and control model, of which the Code of Ethics is an integral and essential part, Glenair's senior management has been entrusted with the task of monitoring the functioning of the model and updating it.

29.2 Monitoring the compliance with the Code of Ethics is left to the management/senior management. Consequently, employees can address any doubts about its interpretation to this body and – also anonymously – report alleged violations of which they have become aware in the course of their work.

In general, the following tasks fall under the responsibility of the senior management:

- communicating with the human resources manager so that they can take appropriate action with respect to reports of violations of the Code of Ethics received;
  monitoring compliance with the Code of Ethics and use access to all Company information sources to do so, including by proposing appropriate updates and considering employee reports;
- reviewing key policies and procedures to ensure compliance with the Code of Ethics;
- contributing to the regular review of the Code of Ethics.

29.3 The organs of the Company and their members, employees, partners and third parties acting on behalf of the Company are obliged to cooperate comprehensively to support or ensure the fulfilment of the tasks of the senior management.

29.4 In the event of a report, as part of its investigations, the senior management ensures the necessary confidentiality to protect the whistleblower, who has reported facts about alleged violations of the Code of Ethics in good faith, from possible forms of retaliation.

29.5 All other recipients may report any violation or suspected violation of the provisions of this Code of Ethics of which they become aware to their contact person in the company or the manager, who will report to senior management in a second instance.

29.6 The Company undertakes to disseminate the Code of Ethics. For this purpose, it uses appropriate means from communication, to corporate tools and employee training.

29.7 All employees must be in possession of the Code of Ethics, know its contents and follow the regulations therein.

29.8 The company also prepares and implements an ongoing training plan based on the guidelines provided by senior management. This aims to ensure knowledge of the ethical principles and standards set out in this Code of Ethics. Training initiatives are distinguished according to the role and responsibility of the employees; a training program is offered to new hires to illustrate the contents of the Code of Ethics, compliance with which is required.

29.9 The senior management and the Company management are available for any information and clarifications regarding the Code of Ethics.

29.10 It is the responsibility of everyone, in particular the management, to include the contents of the Code in the training programs and to refer to them in all company procedures, directives and guidelines.

29.11 Any questions of application in connection with this Code must be discussed immediately with the senior management.

29.12 All those who cooperate with the Company, without distinction or exception, in Germany or abroad, undertake to ensure compliance with the principles of this Code. Under no circumstances can an action for the benefit of the Company justify conduct that is contrary to the law and these principles.

29.13 In particular, all recipients are obliged to ensure that these rules are properly applied and respected.

## 30. SANCTION

30.1 Anyone who becomes aware of violations of the principles of this Code of Ethics and/or the Company rules must immediately report them to senior management. The reports must be made in writing, on paper or electronically and must be collected and archived by the senior management.

30.2 The notification must be made through the channels specified by the Company. It can also be done anonymously, bearing in mind that in order to be considered, it must be accurate on

precise and truthful facts. For this purpose, facts and circumstances must be presented and related to specific contexts.

30.3 The Company will take the necessary precautions to protect the whistleblower from any form of retaliation. In this context, retaliation is understood to mean acts that could lead to forms of discrimination or punishment (e.g. interruption of relationships with partners, suppliers, consultants, etc.; refusal of employee promotions). To this end, the identity of the whistleblower shall be kept confidential in accordance with applicable law, without prejudice to legal obligations.

30.4 Responsibility for conducting investigations into possible violations of the Code of Ethics lies with the senior management, who may, where appropriate, hear the author of the report as well as the person responsible for the alleged violation. Personnel are obliged to cooperate fully in all internal investigations.

30.5 After the senior management has determined the validity of the report, these steps must be taken:

a) violations by employees must be reported immediately in writing to the responsible Company management/function. The initiation of the resulting disciplinary measures is ensured by the management;

b) in the event of violations that are considered justified by the management and/or the senior management, the management must be informed immediately.

30.6 Violations of the Code of Ethics by an employee constitute a breach of employment duties and/or a disciplinary offense. This has legal consequences, which can range from disciplinary action to termination of employment. This may also result in claims for damages.

30.7 Compliance with the principles of this Code of Ethics, which are formalized in contractual agreements by the insertion of a specific clause in the GTCs, is an essential part of the obligations of third parties (suppliers, consultants or experts, trading partners) who have business relationships with Glenair. Therefore, any violation of these principles in connection with the activities of third parties may constitute a breach of contract with all legal consequences.

## 31. APPROVAL OF THE CODE OF ETHICS AND ITS AMENDMENTS

31.1 This Code of Ethics is approved by the management.

31.2 Any changes or updates will be made in the same form and will be communicated to the recipients.