

ORGANISATIONAL NORM

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	ORGANISATIONAL NORM	Reg. no.:
	CODE OF ETHICS	Edition: 1
		Page : 2

Divider

System and organisational norms in LOTN a.s., are stored:

- **Signed original is stored with management representative as No. 1**
- **Copy of the original is stored with the developer of the norm as No. 2**

LOTN, a.s. employees have access to them on the intranet and Happy HR. Where the norms are updated or through their supervisor they have access to the norms Z, ON, SON.

All leading LOTN, a.s. employees are required to acquaint their subordinates with changes in norms and allow access to the content in electronic or printed form.

 LETECKÉ OPRAVOVNE TRENČÍN, a.s.	ORGANISATIONAL NORM	Reg. no.:
	CODE OF ETHICS	Edition: 1
		Page : 3

Contents

Preamble.....	4
1 CUSTOMER RELATIONS.....	5
2 RELATIONS WITH SUPPLIERS AND CREDITORS	5
3 RELATIONS WITH STATE AND GOVERNMENTAL BODIES, THE REGION AND SOCIETY	6
4 RELATION WITH COMPETITORS	6
5 RELATIONSHIP TO THE ENVIRONMENT	7
6 INTERNATIONAL BUSINESS RELATIONS	7
7 PUBLIC RELATIONS	7
7.1 Respect for people – the basis of interpersonal relations in society	7
7.2 Honest employment.....	8
7.3 Ethics of communication, dissemination and protection of information.....	8
7.4 Protection of the company's reputation and assets	9
7.5 Conflict of interest	9
7.6 Ethics of dispute resolution	9
8 ETHICAL RESPONSIBILITIES OF MANAGEMENT	10
9 CLOSING PROVISIONS.....	10

	ORGANISATIONAL NORM	Reg. no.:
	CODE OF ETHICS	Edition: 1
		Page : 4

Preamble

Joint stock company Letecké opravovne Trenčín (LOTN) does business primarily in the area of performing the full range of maintenance and modernization activities of aircraft, aircraft components and ground aviation security equipment.

Being aware of its position as a company, it accepts social responsibility for its actions and wants to be an example for others. The company declares its commitment to base all activities on its corporate values and respect generally recognized rules and principles of business.

Ethical behaviour is of key importance for the long-term functioning and economic interests of LOTN and is a manifestation of responsibility towards all subjects of labour and business relations. Respecting ethics is also important for cultivating the economic system and is for the benefit of the entire company.

LOTN's good name and the trust of all stakeholders are among the most important values that the company has. Their protection is a priority task for every employee, the entire company.

All employees are required to act in accordance with this Code of Ethics, maintain high moral standards in business and work conduct, and create a working environment of trust and respect.

 LETECKÉ OPRAVOVNE TREŇČÍN, a.s.	ORGANISATIONAL NORM	Reg. no.:
	CODE OF ETHICS	Edition: 1
		Page : 5

1 CUSTOMER RELATIONS

- 1.1 We have an honest and fair approach towards our customers, satisfying their needs and interests is a prerequisite for a successful and lasting business relationship.
- 1.2 We behave discreetly, politely, without any favouritism, prejudice or discrimination towards our customers. LOTN is committed to using only legitimate business methods and considers information obtained from customers to be confidential.
- 1.3 We ensure that our products and services are of high quality, durable and safe, complying with established national and international standards.
- 1.4 We ensure that we provide the widest possible warranty and post-warranty service in an effort to maintain high customer satisfaction.
- 1.5 We provide timely, complete, unbiased, truthful and understandable information about our products and services. We do not spread untruths, concealment or exaggeration in advertising and other public appearances.

2 RELATIONS WITH SUPPLIERS AND CREDITORS

- 2.1 Our relationships with suppliers and creditors are based on mutual trust and respect. All information about them is considered confidential.
- 2.2 We do not abuse our market position and are committed to creating equal conditions for all our business partners.
- 2.3 We are committed to creating a safe working environment for our business partners and their employees, who associate at the company's workplaces. At the same time, we require them to comply with all safety regulations valid in LOTN.
- 2.4 We are committed to comply with the agreed contractual terms. If, due to extraordinary circumstances, we cannot meet the agreed requirements, we enter into negotiations with the business partner as quickly as possible in order to find an alternative solution.
- 2.5 We provide our creditors with credible guarantees, truthful information about our economic situation and are committed to the effective evaluation of the invested capital.
- 2.6 Company employees may not accept any monetary gifts or commissions from business partners.

 LETECKÉ OPRAVOVNE TREŇČÍN, a.s.	ORGANISATIONAL NORM	Reg. no.:
	CODE OF ETHICS	Edition: 1
		Page : 6

3 RELATIONS WITH STATE AND GOVERNMENTAL BODIES, THE REGION AND SOCIETY

LOTN undertakes to:

- 3.1 behave as a socially responsible organization in relation to state and government bodies, local authorities, the region and the entire society and provide them with truthful and timely information,
- 3.2 fulfil all conditions arising from the founding charter, respect the law and act only in accordance with applicable legislation,
- 3.3 pay taxes properly, consciously refrain from any tax evasion and ensure the transparency of all financial transactions,
- 3.4 contribute to economic growth and increasing the standard of living of the region and the entire society,
- 3.5 ensure the creation of job opportunities, respectively to maintain employment,
- 3.6 to support healthcare, cultural, moral, educational, technical and infrastructural development in the region and society through its sponsorship and donation activities,
- 3.7 to spread the good name of the region and the country through its activities,
- 3.8 not to use the company fund to provide direct or indirect contributions to political parties, candidates or groups in the country where the joint-stock company or its employee does business,
- 3.9 to provide the public with complete, understandable and truthful information about its activities and intentions through the media. It systematically develops friendly, highly professional and ethical relations with the media.

4 RELATION WITH COMPETITORS

- 4.1 LOTN respects the laws that regulate competitive relations. It treats competitors vigorously but honestly, in accordance with good morals of competition and in the interest of the good name of the entire industry.
- 4.2 The employees of the joint-stock company respect the property and good name of competing companies and perceive them as equal subjects.
- 4.3 It does not attempt to obtain information about competitors' business activities by any dishonest or illegal means (by bribery, requesting confidential information from customers or by any other dishonest means).
- 4.4 The company does not apply any form of unfair competition.

 LETECKÉ OPRAVOVNE TRENČÍN, a.s.	ORGANISATIONAL NORM	Reg. no.:
	CODE OF ETHICS	Edition: 1
		Page : 7

5 RELATIONSHIP TO THE ENVIRONMENT

- 5.1 The company's employees consciously adhere to the concept of sustainable development in the environmental field and the company assists in programs for the protection and creation of the region's environment.
- 5.2 Recognizing the specific nature of the maintenance of aircraft equipment, the company places special emphasis in its activities, products and services on the protection of the health and safety of the entire public.
- 5.3 The company respects the applicable ecological and technological standards in all its activities and promotes the adoption of more demanding standards for the reduction of adverse environmental impacts.

6 INTERNATIONAL BUSINESS RELATIONS

- 6.1 The joint-stock company behaves responsibly in international trade and investments. It complies with the legislation enforced in the host country.
- 6.2 It contributes to the economic well-being and development of the host country, respects its traditions and culture.
- 6.3 The company adheres to the UN Universal Declaration of Human Rights and ensures the application of uniform procedures and the achievement of high moral standards even in countries with different business practices.

7 PUBLIC RELATIONS

- 7.1 Respect for people – the basis of interpersonal relations in society
 - Relations with employees and between employees, as well as between superiors and subordinates in LOTN are based on respect for the dignity of every person and on respecting fundamental human rights in the spirit of the UN Universal Declaration of Human Rights.
 - Every employee is required to create an atmosphere of mutual respect, trust and belonging, without which cooperation and long-term excellent economic results cannot be achieved.
 - No physical, psychological or sexual harassment is tolerated in LOTN. Any form of abuse, humiliation, bullying and dishonour of the human personality or discrimination is unacceptable in the company.
 - Every employee of the company is responsible for his actions. He should behave in such a way as not to harm his colleagues, not to complicate their work and not to hinder their initiative.
 - Anyone who thinks they can contribute to the improvement of any area of the company's operations has the right to be heard.

	ORGANISATIONAL NORM	Reg. no.:
	CODE OF ETHICS	Edition: 1
		Page : 8

7.2 Honest employment

- LOTN hires employees and guides their careers based on their qualifications for the job without any racial, religious or national discrimination, regardless of skin colour, gender, age, status or sexual orientation.
- LOTN pays consistent attention to the professional and personal development of its employees in accordance with the current and future needs of the company. It is committed to creating conditions for the development of the knowledge, skills and abilities of its employees, corresponding to their current or planned job classification.
- LOTN is committed to implementing a fair remuneration policy without any discrimination. The remuneration method reflects individual results and the importance of the job position in relation to economic results and the development of living costs.
- LOTN is committed to respecting objective criteria and basic ethical standards in the process of dismissing employees. The dismissal process must be announced in a timely manner, transparent, based on basic psychological knowledge and must not violate human dignity.
- LOTN is committed to creating a hygienically harmless, safe working environment. However, employees are obliged to respect all safety regulations and take care not to endanger themselves, their colleagues, other persons or cause material damage.
- LOTN ensures a good level of social and health care for its employees, as well as former employees who have retired.
- In order to create conditions for decent work and management of the company, it is committed to cooperating and maintaining a partnership with representatives of trade unions.

7.3 Ethics of communication, dissemination and protection of information

- LOTN management creates space for each employee to freely express their own opinion without the risk of intimidation or sanctions.
- LOTN management is committed to explaining its goals and objectives, as well as the significance of individual activities and activities, to supporting active communication and to activating employees to improve their work performance, as well as the overall performance of the company.
- LOTN supports cultivated communication not only between individual employees, but also between individual company departments. Each employee and department is required to participate in this communication and provide information that is beneficial to the entire company. Deliberate concealment of information that could contribute to improving the quality of the company's work is considered morally unacceptable.
- All LOTN employees are obliged to protect information that belongs to the company or that is related to its business activities. Such information is considered confidential, may only be used for work purposes and never for personal purposes. Employees leaving LOTN must continue to protect information belonging to the company.

 LETECKÉ OPRAVOVNE TREŇČÍN, a.s.	ORGANISATIONAL NORM	Reg. no.:
	CODE OF ETHICS	Edition: 1
		Page : 9

7.4 Protection of the company's reputation and assets

- Every LOTN employee acts not only as a private person, but also as a representative of the company. Therefore, even in public, he/she should take care of the company's good name and protect its interests.
- Every LOTN employee is obliged to protect the company's intellectual and material property. Telephones, faxes, e-mail, as well as all computer equipment, hardware, software, are used only for work purposes, except in cases of emergency. Other special work equipment is used according to established rules.
- LOTN is committed to respecting copyright and requires the same attitude from its business partners in relation to documents and materials. Only legally purchased software is allowed to be used in the company.
- A LOTN employee does not appropriate, borrow or lend company property without permission. Illegal appropriation of company property or its use for personal purposes or for someone else's needs without express permission is considered as serious as direct theft and may lead to termination of employment. An employee's paid work time is also considered company property that should not be used for personal use without proper permission.

7.5 Conflict of interest

- LOTN employees do not provide or accept any bribes. All of them are obliged to comply with the relevant provisions of the Criminal Code No. 140/1961 Coll., as amended.
- Every LOTN employee shall manage his/her private interests in financial, commercial or other activities carried out outside the company in such a way as to avoid any actual or potential conflict of interest. These activities must be in accordance with legal norms and internal regulations. In these activities, he/she may not abuse the resources of the workplace, his/her position in LOTN, or threaten the company's reputation.
- No LOTN employee shall, in financial, commercial or other activities carried out by him/her or his/her relatives outside the company, take advantage of or profit from information that he/she has obtained within the scope of his/her work duties and responsibilities in LOTN and that is not generally available.
- A LOTN employee may carry out business activities that are consistent with the company's business activities only with its prior written consent.

7.6 Ethics of dispute resolution

- LOTN employees should behave in a way that prevents disputes. In the event that a dispute or conflict does occur in the workplace, they resolve it in a civilized, non-violent manner, through dialogue with the participation of all interested parties.
- In the event of a serious dispute at LOTN, the parties involved must show responsibility and use all negotiation options to ensure the smooth operation of the company.

 LETECKÉ OPRAVOVNE TREŇČÍN, a.s.	ORGANISATIONAL NORM	Reg. no.:
	CODE OF ETHICS	Edition: 1
		Page : 10

8 ETHICAL RESPONSIBILITIES OF MANAGEMENT

- 8.1 LOTN managers are role models for other employees of the company. They do not shirk their responsibility arising from their position. They adhere to the rules of management ethics and take care of their professional honour.
- 8.2 The key requirement for the work of each LOTN manager is to follow the motto "Do what you yourself require of others!" Each member of management is obliged to realize that he is responsible for the development of ethics in LOTN.
- 8.3 LOTN managers do not consider the company's employees only as executors of orders, but as collaborators for whom they prepare conditions for them to effectively use paid working time, voluntarily accept their responsibilities and creatively contribute to the development of the company.
- 8.4 LOTN managers continuously develop relationships with internal and external groups on a partnership basis. They support employees' belonging and loyalty to the company and their interest in prosperity using appropriate methods.
- 8.5 LOTN managers undertake to provide regular, understandable and truthful information to their colleagues. At the same time, they verify whether the information provided by them has found its addressees.
- 8.6 LOTN managers are aware that intensive cooperation between science and industry is a prerequisite for further progress. Therefore, they contribute to this with their share.
- 8.7 LOTN managers are obliged to familiarize employees with the values and requirements set out in this Code of Ethics and to train them to comply with it. They are obliged to set an example in respecting it. They are also obliged to create an environment that is socially just and in which it is possible to develop a dialogue so that the Code of Ethics is not used.

9 CLOSING PROVISIONS

- 9.1 **The Code of Ethics of Letecké opravovne Trenčín, a.s.** applies to all managers and employees of the company. All are obliged to comply with the Code, act in accordance with its provisions and support it.
- 9.2 All LOTN employees must be aware that any violation of the ethical standards set out in this Code will be punished by appropriate sanctions that apply to all employees.
- 9.3 Employees are obliged to report a violation of this Code. The report is submitted to the direct superior, which is a typical procedure. However, if the employee has the impression that this is not appropriate in a given situation, he or she may report to the next higher superior according to the organizational structure. The report can be submitted at any time verbally, in writing, by e-mail or by telephone.

 LETECKÉ OPRAVOVNE TREŇČÍN, a.s.	ORGANISATIONAL NORM	Reg. no.:
	CODE OF ETHICS	Edition: 1
		Page : 11

- 9.4 The direct superior of the employee is obliged to deal with the submitted report on the violation of the Code of Ethics of Letecké opravovne Trenčín, a.s. and accept the solution. If he/she considers it necessary, he/she can contact his superior employee.
- 9.5 The identity of persons submitting a report on the suspected violation of the Code of Ethics is kept secret, to the greatest extent possible. No reprisals will be directed against an employee who reports a suspected violation of this Code.
- 9.6 Disciplinary proceedings or their absence do not exclude the action of criminal authorities in the event of suspicion that an offense or crime has been committed.
- 9.7 Comments on the content and structure of the Code of Ethics of Letecké opravovne Trenčín, a.s. are submitted to the submitted to the email address ethics@lotn.sk.