

Business Ethics Policy

Ethical Business Conduct for Aerospace & Defence Industry: It is recognized that operating to the highest ethical standards benefits all companies and society. We in the aerospace and defense industry fully acknowledge and support this principle. The Aerospace Industries Association of America (AIA) and Aerospace and Defence Industries Association of Europe (ASD) have jointly developed these Global Principles of Business Ethics for the Aerospace and Defense Industry “Global Principles”.

At ATH Stainless Steel Mfg. Ltd. We dedicatedly follow these Global Principles. Which are based on best practices including the Common Industry Standards for European Aerospace and Defence and the Defense Industry Initiative on Ethics and Business Conduct in the US. ATH believe that our company’s long-term success depends on companies upholding integrity in bidding, negotiating and performing contracts and behave ethically towards our customers, suppliers, competitors, employees, and other stakeholders (If applicable).

These Global Principles highlight key issues in the aerospace and defense industry that may impact on ethical business conduct. They are not an exclusive list of business ethics issues that ATH Stainless Steel may face. It is intended that these Global Principles will continue to develop over time to reflect current best practices.

Implementation: With these Global Principles ATH commit to have comprehensive policies and integrity programmes, and to foster effective practices within our aerospace and defense business operations to implement these Global Principles which shall include:

- promoting awareness and compliance with the integrity policies of the Company consistent with the Global Principles through appropriate communication and training.
- encouraging our employees, directors and supervisors to report all specific concerns that they may have concerning compliance with the integrity policies of the Company consistent with the Global Principles without fear of retaliation.

Zero Tolerance to corruption: ATH Stainless Steel Mfg. Ltd. will comply fully with all antibribery laws applicable to the conduct of their business, such as the Canadian Corruption of Foreign Public Officials Act (CFPOA) equivalent to the U.S. Foreign Corrupt Practices Act (“FCPA”) and those laws enacted pursuant to International Conventions (including, but not limited to, the 1997 OECD Convention and the 2003 United Nations Convention Against Corruption (“UNCAC”)).

ATH will not offer, promise, or provide any undue pecuniary or other advantage (e.g. payments, gifts, hospitality, as well as political contributions or charitable donations), to public officials, political parties or political candidates, or to any private party, in order to obtain or retain business or gain any other improper advantage in the conduct of their business (hereafter «Improper Advantage»). ATH shall duly account for payments, gifts, hospitality, political contributions or charitable donations in their books and records in compliance with applicable regulations and in a manner, which permits reasonable traceability.

ATH Stainless Steel will establish and enforce policies and internal control procedures that prohibit the company and their employees, directors and officers from offering, promising or providing – directly or indirectly – any Improper Advantage, and will conduct training on such policies and procedures.



ATH will make their subcontractors, suppliers and Customers aware of the integrity policies of the company, and require them to refrain from offering, promising or providing (directly or indirectly) any Improper Advantage.

ATH Stainless Steel prohibit facilitation payments. In recognition that such payments undermine the integrity of the whole Aerospace & Defence industry, even where such payments are not prohibited by law, ATH will seek to eliminate facilitation payments.

Respect for Proprietary Information: ATH shall keep proprietary information of third parties to which they have gained access in accordance with the terms of its disclosure and in strict compliance with all applicable laws and regulations.

ATH will not solicit or accept a third party's proprietary information (whether provided by a customer or otherwise), such as bid and proposal information, or technical or price data, unless the owner of the data has agreed to its release.

In the situation where ATH receive a third party's proprietary information without authorization:

- ❖ shall promptly cease dissemination and review of such information;
- ❖ shall promptly destroy or return such information; and
- ❖ should inform the third party of the incident and their response.

Founding Associations:

- Aerospace Industries Association (AIA)
- Aerospace and Defence Industries Association of Europe (ASD)