



**Intelligently Defining Aviation®**

**CORPORATE SOCIAL RESPONSIBILITY CHARTER**

**PREPARED BY: ENTERPRISE RISK MANAGEMENT**

[www.gatelesis.com](http://www.gatelesis.com)

# 1. EXECUTIVE SUMMARY

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GA Telesis is devoted to corporate social responsibility towards all its employees, customers, suppliers, investors, and other stakeholders including communities and institutions. Apart from compliance with domestic and international laws and regulations, GA Telesis firmly upholds its core values: passion, integrity, respect, and professionalism, and sets high standards in ethics, business integrity and sustainability compliance. Exemplary business conduct depends on all of us accepting our responsibility for upholding our high standards and we expect all employees, officers, directors, agents, and others acting on our behalf to understand, comply and assist in implementing this Corporate Social Responsibility Charter.

This Corporate Social Responsibility Charter is a core document for GA Telesis' operations, and we endorse its principles of respect, protection of human rights, labor, health, security, environment, and integrity.

GA Telesis enjoys a hard-earned legacy of integrity, which is key to our success. Compliance with this Charter ensures that we continue that legacy, maintaining the trust and confidence of everyone with whom we do business.

## 1.1. PURPOSE OF THE CHARTER

This Charter is about our values and the way we conduct ourselves at work. All board members, all employees of GA Telesis and its subsidiaries (including part-time and temporary employees), and all consultants and contractors working for us are expected to comply with this Charter, act honorably, and treat others with courtesy and respect. In other words, always 'do the right thing'.

## 1.2. OUR OBLIGATION

In addition to this Charter, we all have an obligation to be aware of and comply with the local laws in the countries in which we work, while at the same time ensuring our compliance with other policies, procedures, and guidelines that apply to our job responsibilities at GA Telesis. We must also uphold our obligation to report all potential violations.

## 1.3. OUR CORE VALUES

We are committed to doing business in a principled manner and to behave consistently with our core values – Passion, Integrity, Respect, and Professionalism.

**Passion:** We are passionate about our mission to ensure customer success, and everything we do stems from that passion, providing a motivation that extends far beyond profits.

**Integrity:** We adhere to the highest standards of ethical conduct at every level of our operations and act with integrity when conducting business.

**Respect:** Our highest priorities are respecting the rights of our employees, the people with whom we work and those affected by our operations wherever we operate in the world, , treating everyone fairly, showing consideration for their needs and listening to and understanding their viewpoints.



**Professionalism:** We take great pride in the skills and professional conduct of our employees and will strive to continuously improve in order to exceed the expectations of our customers.

## 2. HUMAN RIGHTS

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We care about our people and strive to ensure that they are happy and satisfied in their roles. Reflective of the value we see in them, we consult and involve our people in important decision making and empower them to shape their career path, influence their working environment and help direct our involvement within our community.

### 2.1. HARASSMENT

We respect each other and promote a work environment that is free from harassing, coercive, or disruptive conduct, including sexual harassment, and conduct that creates an intimidating, hostile or otherwise offensive environment. Regardless of where we operate in the world, we aim to treat everyone fairly, show consideration for their needs and listen to and understand their viewpoints.

### 2.2. NON-DISCRIMINATION

We provide equal opportunities to all employees and applicants and do not discriminate based on race, religion, national origin, gender, sexual orientation, disability, or any other basis. We take pride in the fact that our workplace is inclusive and reflects the diversity of the communities in which we operate.

### 2.3. PROHIBITING CHILD LABOR

We adhere to minimum age provisions of national labor laws and regulations, and, where national law is insufficient, consider international standards (e.g. ILO's Convention). GA Telesis supports the elimination of child labor and believes that societies that permit child labor are jeopardizing their future and that of future generations.

### 2.4. RELIGIOUS ACTIVITIES

GA Telesis recognizes the right of employees to participate in religious activities. As a company, we maintain a neutral position with respect to religion.

### 2.5. FREEDOM OF OPINION

GA Telesis recognizes every individual's right to freedom of opinion and expression and these rights guarantee that no one should be harassed on account of their opinions.

## 3. HEALTH, SAFETY, ENVIRONMENT (HSE)

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We aim to provide and maintain a safe and healthy working environment for all employees.

### 3.1. SAFE WORKING PLACE

Every effort is made to ensure that risks of accidents, injury and exposure to health risks are minimized. We commit to implement protective measures to prevent any potential risk of damage to human or animal health and to the environment. Our partners and suppliers also are expected to protect the health, safety, and the welfare of their employees, contractors, visitors, suppliers and others who may be affected by their activities.

### 3.2. ENVIRONMENTAL COMMITMENT

Our business activities have a significant impact on climate and the environment. We are striving to become a climate-neutral company and are committed to the continuous reduction of our greenhouse gas emissions. We seek to protect the environment by minimizing our environmental impact and working to preserve natural resources in all our operations and business activities. We meet or exceed all applicable environmental laws and regulations wherever we do business.

### 3.3. COMMUNITY OBLIGATIONS

The objective of our community activities is to deliver a sustainable societal impact. We seek to contribute to the economic development and well-being of the communities in which we work by partnering with local and national charitable organizations. We are proud that many of our employees donate time and money to charitable causes.

## 4. MARKET INTEGRITY

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We conduct our business worldwide in accordance with all applicable legal requirements, including the following, faced regularly in our business:

### 4.1. EXPORT CONTROLS

Trade embargoes and economic sanctions prohibit or severely restrict business activities with certain countries and their nationals, as well as business activities with specifically listed entities and persons. We are fully committed to implementing policies and procedures to ensure strict compliance with all applicable US, UK, EU, and other applicable export laws and regulations and provide regular training so that everyone at GA Telesis is familiar with the key elements of such laws and regulations. Compliance with export controls is critical to our reputation and success.

### 4.2. FAIR COMPETITION

We compete on a fair and level playing field and will not enter into any agreements or arrangements intended to restrain or limit competition.

We accurately represent GA Telesis and our products in our marketing, advertising, and sales materials. Deliberately misleading messages, omissions of important facts or false claims about our products, individuals, competitors or their products, services or employees are inconsistent with our values and may violate applicable law. When it is necessary to make comparisons between our products and our competitors, we make factual and accurate statements that can be easily verified and reasonably relied upon.

### 4.3. ANTI- MONEY LAUNDERING (AML)

Strict compliance with our Anti-Money Laundering (AML) Policy, including our “Know Your Customer” requirements, ensures that GA Telesis will not be involved in recycling the proceeds of crime, which not only helps to prevent crime but also protects our reputation. In compliance with applicable anti-money laundering laws, GA Telesis conducts business with reputable business partners and conducts due diligence investigations to verify the origin of funds.

### 4.4. ANTI-CORRUPTION / ANTI-BRIBERY

We adhere to the highest levels of honesty, integrity, and ethics when conducting business and comply with the United States Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act 2010 (“UK Bribery Act”), and other applicable anti-bribery laws and regulations which prohibit making or promising to make payments for the purpose of obtaining or retaining business.

We ensure that our customers, suppliers, agents, consultants and other third parties with whom we do business are reputable and are not engaged in corrupt or illegal activities by performing robust, risk-based due diligence and by monitoring them during our business relationship to confirm that they comply with all applicable laws and adhere to the highest standards of integrity.

No bribe may be provided, offered to or accepted from any person in exchange for recommending, purchasing, supplying or administering our products or for a commitment to continue to do so. Nothing may be offered, provided, or accepted in a manner or on conditions that would have an inappropriate influence on a person's action or conduct, or that would create the appearance of doing so. Employees and any party acting on behalf of GA Telesis should not appear as unduly influencing suppliers, customers, or government officials in any way.

#### **4.5. INSIDER TRADING**

We do not use non-public information about a company or its business to trade in the company's stock or pass such information along to others so that they may do so. All stakeholders (employees, partners and suppliers, and their personnel) must not use any material or non-publicly disclosed information obtained in the course of their business relationship with us as a basis for trading or for enabling others to trade in the stock or securities of any company.

#### **4.6. RECORD KEEPING**

GA Telesis is committed to maintaining accurate, timely and complete financial records. These financial and accounting records serve as a basis for managing our businesses and are essential in fulfilling our responsibility to shareholders and other business partners. Such financial records also are necessary for preparation of financial statements and tax filings.

## 5. PROTECTING THE COMPANY'S INTERESTS

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### 5.1. AVOIDING CONFLICT OF INTEREST

We avoid any conflict, or even the appearance of a conflict, between our personal interests and the interests of GA Telesis. A conflict exists when personal interests, duties, obligations, or activities, or those of a family member, are or may be, in conflict or incompatible with the interests of GA Telesis. Any actual or potential business or personal conflict of interest that arises must be disclosed.

Business decisions must always be made on a fair and impartial basis. Everyone involved in buying goods or services or providing them to our customers must be careful to do so objectively. Accepting, offering, or providing gifts, services or hospitality must be avoided, as it could leave GA Telesis open to accusations of unfairness, partiality, or deceit, and place our ethical reputation at risk.

### 5.2. COMPANY PROPERTY, RECORDS, AND INFORMATION

We have an obligation to protect the company's physical assets, including our facilities, equipment, inventory, and supplies, from loss, theft or damage, and to safeguard the integrity of the company's accounting and other records, ensuring that the information therein and in any reports to regulators or investors is complete and accurately reflects the underlying transactions or activity.

We respect and protect the privacy of individuals and are committed to complying with all applicable data protection laws and regulations, including the European Union's General Data Protection Regulation (GDPR) and must use our best efforts to avoid inadvertent disclosure of the company's confidential information by taking care not to lose or misplace documents or phones, laptops or other electronic equipment containing such information.

### 5.3. INTELLECTUAL PROPERTY

We protect and, when appropriate, enforce our intellectual property rights, including copyrights, patents, trademarks, trade secrets, design rights, logos, expertise and other intangible property. We also respect the intellectual property of others and do not knowingly infringe upon such rights.

### 5.4. OUR BRAND

We will seek to promote and protect the GA Telesis brand and reputation, which is one of our most valuable assets and a key to our continued success.



## 6. REPORTING

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### 6.1. REPORTING

Any concerns regarding suspected violations of this Charter should be reported to our General Counsel.