



# Code of Conduct of MTU Aero Engines

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Our dealings are based on a code of conduct and business ethics set forth for all MTU employees, management staff and board of management alike

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## PREFACE CEO



Lars Wagner, CEO / Chief Sustainability Officer

Dear employees,

Over the decades, MTU has built up an excellent reputation as a responsible, ethical and lawful company. You all contribute to this with your work and your actions. Fair and respectful dealings with you, with our customers, suppliers and business partners are our unwavering commitment. We all act on behalf of MTU and represent our company. We must always be aware of this responsibility.

Increasing legal regulations often make it difficult to keep everything in view. With our Code of Conduct, we provide you with a guideline for mastering legal and ethical requirements in your day-to-day work and avoiding legal violations. The aim is to further strengthen trust in MTU's performance and integrity and to safeguard our success in the long term. Our management personnel are particularly called upon to orient their conduct along the values described and to serve as role models in the context of their management duties.

## PREFACE CEO

”In dealing with our employees  
as well as with our customers,  
suppliers and business partners,  
we behave in a fair and  
respectful manner.“

The Code of Conduct is binding for us. Violating the principles laid down herein can lead to serious disadvantages - from claims for damages to damage to our reputation in the world.

It is therefore our joint responsibility - whether on the shop floor, at the desk or in the boardroom - to know and comply with the Code of Conduct. In this way, we can continue to live up to our reputation as well as our claim to act responsibly and lawfully.



Lars Wagner  
CEO / Chief Sustainability Officer

## HUMAN RIGHTS AND COLLABORATION

### We reject discrimination.

We respect the personality and dignity of every human being. We reject discrimination. No one may be treated differently on the basis of gender, disability, ethnic origin, religion or ideology, age or sexual identity.

All employees are given equal opportunities and are deployed and promoted according to their skills, abilities and performance.



## HUMAN RIGHTS AND COLLABORATION



We work constructively with employee representatives.

We acknowledge the applicable labor law and works constitution regulations. We work constructively with employee representatives and trade unions. Agreements we reach take equal account of the interests of our employees and those of our company. Even in the case of controversial positions, we want to work together in a spirit of trust over the long term.

## HUMAN RIGHTS AND COLLABORATION

We offer compensation commensurate with performance.

We offer our employees appropriate and performance-related remuneration. The remuneration principles correspond at least to the respective national legal standards and collective agreements.



## ENVIRONMENTAL AND CLIMATE PROTECTION



# We protect the environment.

At MTU, we support environmentally and climate-conscious behavior on the part of our employees and expect them to behave responsibly. This applies in particular to the use and development of new products and manufacturing technologies that conserve natural resources, enable recycling, reduce pollution and preserve the natural environment.

## ENVIRONMENTAL AND CLIMATE PROTECTION

We are all aware of our ecological responsibility. We comply with the applicable environmental protection regulations. With our products, we set standards in reducing fuel consumption, noise and pollutant emissions. The long service life of our products and the continuous improvement of our maintenance processes reduce the need for raw materials. We ensure that our operations are environmentally friendly and economize the use of materials and energy.



## BUSINESS SECRETS



## We protect our know-how.

For decades, we have been developing new technologies and thus actively shaping the future of aviation. Our patents and trade secrets are important pillars of our success. This knowledge must be protected.

That's why we treat our company and trade secrets confidentially - both for the duration of the employment relationship and after its termination. We also treat information from our business partners as confidential.

## DATA PRIVACY

### We handle personal data confidentially.

The protection of privacy and informational self-determination is important to us. We handle personal data carefully and confidentially.

We collect, process and store this data only for legitimate, previously defined purposes. This applies to the data of employees, but also to the data of customers, suppliers, applicants and all people connected with MTU.



## INSIDER INFORMATION



We treat insider information as strictly confidential.

Insider information is non-published information about transactions within our company that may have an influence on the price of the MTU stock. The disclosure of such information is prohibited by law and may have **criminal consequences**. We therefore treat this information as strictly confidential and do not make any securities transactions on the basis of this information.

## COMPANY PROPERTY

# We protect MTU's property.

We treat MTU property with care and use it only for official purposes. We protect it from loss, theft or misuse.

Leftover material, samples and waste, even if they appear worthless, are not taken out of the plant without prior approval.



## CONFLICT OF INTERESTS



We respect MTU's interests.

MTU is in favor of employees engaging in voluntary or political activities in their private lives. However, this can also give rise to situations in which employees' personal interests conflict with the obligations arising from their MTU activities. Such conflicts of interest may arise, for example, from private contacts or business dealings, from sideline activities or from private voluntary or political commitments.

## CONFLICT OF INTERESTS

We require prior written consent for regular sideline activities, as well as for political mandates and honorary offices if MTU's legitimate interests are affected.



## COMPLIANCE



### We do not bribe and we do not take bribes.

MTU does not tolerate immoral or corrupt practices, such as bribery or the granting of undue advantages.

Anyone who demands or accepts an advantage in return for favoring a business partner or supplier, for example, can be punished for corruption. The reverse is also true, of course. Anyone who promises or grants an advantage to a business partner of MTU in return for preferential treatment of our company may be liable to prosecution for bribery. This is particularly true when dealing with public authorities, public officials or politicians.

## COMPLIANCE

The acceptance of benefits by MTU employees is only permissible if the benefit is voluntary, socially appropriate and within the framework of the general rules of courtesy in the business relationship. An amount of € 50 serves as a guideline.

Inappropriate gifts, hospitality and other benefits given by MTU employees to business partners or the acceptance of such benefits from business partners by MTU employees are prohibited! We pursue a zero-tolerance policy in this area. The prohibition applies without restriction. It therefore does not matter to whom, in which part of the world or for what purpose such benefits are granted.



## COMPLIANCE



### We do not participate in anti-competitive agreements.

MTU acts as a fair business partner and is committed to equal and transparent competition. We therefore comply with the applicable trade laws and regulations on pricing, antitrust and competition law, and consumer protection.

These laws govern our company's dealings with competitors, suppliers, customers and business partners. They prohibit us from colluding, exchanging information or engaging in other activities that improperly impede free competition.

## COMPLIANCE

### We observe the regulations on customs and export control.

Customs and export control laws govern which products, services and technical data we may sell or provide, where, to whom and for what purpose. For example, in certain cases the supply of goods, the transfer of technologies or software, the provision of services or the payment of invoices may be prohibited without express official approval or prohibited without exception.

All our business units and companies worldwide as well as all employees must comply with these regulations.



## Anything to report?



If you have any questions, are unsure about a situation, or would like to report any anomalies, please contact either your manager, your contact in Human Resources, the Works Council or the Compliance Officer in person. Or you can send an e-mail to: [ombudsmann@mtu.de](mailto:ombudsmann@mtu.de).

These persons will support and advise you personally.

Of course, all information will be treated confidentially. If you wish to remain anonymous, you can use the iTrust whistleblower system to report possible violations of the Code of Conduct, possible unlawful behavior or improper business practices.

## Proprietary Notice

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The document and its contents shall not be copied or disclosed to any third party or used for any purpose other than that for which it is provided, without the prior written agreement of MTU Aero Engines AG.

If you have any questions, please do not hesitate to contact us.

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