



S.C. WINGSROM FLYING QUALITY PRODUCTS S.R.L.

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# **WINGSROM CODE OF CONDUCT**

**OCTOBER 2012**

**WINGSROM FLYING QUALITY PRODUCTS**

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## **I. LIVING WINGSROM/OUR VALUES**

### **CARING**

The Company cares about people: WINGSROM people, customers, shareholders, consumers, suppliers and business partners. WINGSROM is committed to act with compassion, integrity, honesty and high ethics in all situations, to listen with respect to others and to value differences. The Company is also committed to protect the global environment, to enhance the communities where WINGSROM people live and work, and to be compliant with all government laws and regulations.

### **TEAMWORK**

All WINGSROM people are part of a team. Only by sharing ideas, technologies and talents can the Company achieve and sustain profitable growth.

### **CONTINUOUS IMPROVEMENT**

WINGSROM people are committed to getting better every day in all they do, as individuals and as teams. By better understanding consumers' and customers' expectations and continuously working to innovate and improve products, services and processes, WINGSROM will "become the best."

In today's increasingly competitive marketplace, WINGSROM values are the foundation for individual, team and company success. Only by respecting others and living the WINGSROM values can we hope to achieve outstanding business results.

## **II. CODE OF CONDUCT**

WINGSROM Code of Conduct serves as a guide for our daily business interactions, reflecting our standard for appropriate behavior and our company values. The Code clearly conveys to each of us that the manner in which we



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achieve our business results matters just as much as achieving them. The WINGSROM Code of Conduct applies to all WINGSROM people, including directors and all employees of the Company . Vendors and suppliers are also subject to these requirements, as adherence to the Code is a condition for conducting business with WINGSROM.

Most importantly, each employee is responsible for demonstrating integrity and leadership by complying with the provisions of the Code of Conduct and all applicable laws. By fully including ethics and integrity in our ongoing business relationships and decision-making, we demonstrate a commitment to a culture that promotes the highest ethical standards.

Complying with the Code is easiest to ensure by using good judgment and seeking guidance when questions arise. Each of employees is responsible for our decision-making and for our compliance with the Code.

The Code has been translated in English and Romanian.

### **III. BUSINESS AND FINANCE**

#### **1. LEGAL COMPLIANCE**

WINGSROM must take care that all employees comply with local, national and international laws, rules and regulations as well as in-house directives at all times. The management will ensure that all actions are not only guided by good judgement and common sense but also grounded on regulatory.

When in doubt, employees are ask to consult their superior or a qualified expert or the legal department/external legal adviser, so that any potential harm and liability is averted. In case any rules conflict with each other, employees are generally advised to follow the stricted one.

#### **2. FAIR COMPETITION**



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The company pledges that all business transactions will be conducted in a fair and transparent manner. WINGSROM will not engage in any unlawful market agreements or other form of market manipulation nor shall the Company conduct any form of unfair and unethical trade. WINGSROM will not disclose or share any sensitive information with others for purpose of impending fair competition. It is our management's responsibility to maintain equal and fair terms with parties that the Company does business with. All our actions are grounded on the principles of honesty, trust and openness.

### **3. ACCOUNTING AND FINANCIAL REPORTING**

All our employees must act in the best interest of the Company and strictly within the autorisation frame granted to them.

All entries made for accounting or reporting purposes must accurately reflect each transaction without containing misleading information. WINGSROM will ensure that all accounting documents are full, fair, accurate, timely, traceable to the transaction and understandable. Us will use appropriate procedures to attest the truth, fairness and completeness of our financial reporting and all related statements .

All relevant files and documents, whether in electronic or paper form, will be securely retained as stipulated by local law.

## **IV. SAFEGUARDING**

### **1. INTELLECTUAL PROPERTY**

WINGSROM ideas and knowledge represent valuable assets that contribute to the competitiveness and profitability of the Company. Consequently, all employees will ensure that this intellectual property is safeguarded and unauthorized parties will not be allowed to gain access to it.



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Conversely, the Company will only utilize third-party intellectual properties, including patents, copyright and trademarks after the Company has properly secured the rights to use them.

## **1. HEALTH, SAFETY, SECURITY & ENVIRONMENT**

It is WINGSROM belief that the protection of human life has the highest priority in everything that the Company does. It is the Company 's duty to create safe and healthy workplaces and provide appropriate protective equipment for all employees and contractors to prevent accidents, injuries and occupational illness.

WINGSROM will conduct its activities in an ecologically responsible manner. It is the Company's endeavor to use energy and natural resources efficiently and to avoid environmental pollution.

The Company is responsible for the security of its offices. To avoid security threats, every employee is required to pay attention and to report any unauthorized access or other incidents immediately.

## **2. PRODUCT RESPONSIBILITY**

The products and services are subject to high safety standards. WINGSROM strives to avoid the risk to people and environment, loss of values or damage to property resulting from from our products.

In the unlikely event that danger arises from products under WINGSROM control, the Company will make its best efforts to immediately act to identify and eliminate the threats. WINGSROM will be prepared for a quick and efficient response to emergency situations to minimize the potential impact of incidents should they occur.

WINGSROM will comply with all legislative requirements on product labeling and conduct strict quality controls.

## **3. USE OF COMPANY RESOURCES**



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WINGSROM will protect its assets and ensure their responsible and efficient use.

Employees shall not make improper personal, illegal or unauthorized use of company resources and equipment. All employees will ensure appropriate security practices to protect IT systems.

#### **4. CONFIDENTIALITY**

Company information is an important asset which must be safeguarded from unauthorized access. It is not permissible to disclose any confidential information to third parties- either directly or indirectly- relating to any impending business transaction or other internal issue. No employee, including friends or relatives shall derive benefit from use confidential information.

in general, information is regarded as confidential if it has not been published or if it has not otherwise been made available to the public. All employees are responsible for their decision to pass on information. Loss or theft of Company information has be reported immediately. The use of insider information for purpose of training or other dealing is strictly prohibited.

All external parties with temporary access to the company will be notified about the necessity to keep matters confidential, and will be closely monitored to ensure that sensitive information is only shared as needed. Appropriate non-disclosure or confidentiality agreements are and will continue to be use to formalize the process of protecting proprietary information.

#### **V. INTEGRITY**

##### **1. CORRUPTION & BRIBERY**

WINGSROM will not engage in bribery or corruption. Therefore, it is not permitted to provide funds or assets for gifts, gratuities or any favours to third parties, except to the extent that such gifts are insignificants in amount, in



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compliance with applicable law and not given in expectation and/or consideration of any action by the recipient.

It is strictly prohibited to offer, give, solicit or receive any form of bribe or kickback.

## **2. GIFTS & ENTERTAINMENT**

No employee or relative should accept gifts of “significant” value from business partners. All such gifts should be returned with statement that their acceptance is not allowed. If the return of the gift is considered offensive or inappropriate, it may be accepted and passed on the Company for further disposition. In any case, such an event must be reported to the management immediately.

All employees should take due care and use common sense when engaged in entertainment with business partners. All forms of business entertainment provided and received should be occasional, modest and intended to serve legitimate business goals only.

## **3. CONFLICTS OF INTEREST**

Employees should always act in the best interest of WINGSROM. No employee should engage in any activity or have personal interest that interferes with the interest of the company. It is imperative that we perform our duties honestly, objectively and effectively.

Any activity for a third-party company that is competitor, customer or supplier of goods or services of the Company is not permissible.

A family or personal relationship should not influence any business decision made. No employee should misuse her/his position in the company for private interests; whether financial or otherwise.

## **VI. EMPLOYMENT STANDARDS**



## **1. DISCRIMINATION**

WINGSROM is considerate of its employees and other stakeholders and treat them with dignity and respect. The work and creativity of its employees is one of its most important assets. For these reasons the Company must development a working environment of mutual trust, in which all employees interact with other in a fair, respectful, courteous and open manner.

The company is further committed to maintaining a work environment that is free from discrimination and harassment. It is not permissible to discriminate against any person because of ethnic origin, race, nationality, religion, gender, age, disabilities, sexual orientation or other reasons.

## **2. EQUAL OPPORTUNITY**

WINGSROM promotes equal opportunity and diversity, witch are valued as important aspects to its success. Every employee has an equal opportunity to develop her/his skills and talents. The Company provides training and job-specific education for all employees supported by internal standards, procedures and instructions.

WINGSROM will ensure that employment-related decisions such as hiring, evaluation, compensation and termination are solely based on qualifications, performance and other job related factors of the applicants.

## **3. LABOUR STANDARDS**

WINGSROM will provide its employees with a decent and professional work environment and a fair compensation according to all national regulations on pay, benefits and working hours.

Children and forces labour is not tolerated. The employment age shall not be less than the age of completion of compulsory schooling and shall by no means be lower 15 years. Employment shall be freely chosen and must refrain from using any form of forced, involuntary or debt bonded labour.



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Employees are strictly prohibited from working when their performance is influenced by alcohol, other drugs or medications, whether improperly used or otherwise impeding performance.