

# Code of ethics and conduct

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## Messages from the Governing Body

At Titan Group we are proud to be able to contribute to society and the environment with such important work as monitoring and extinguishing wildfires, fumigation and reforestation. Our activity is more than a business, as it allows us to preserve the environment in which we live and help people.

All of us in the Titan Group must be aware that our actions have an impact on the image projected by the company and, therefore, can tarnish the successes that are the result of the efforts of the other members of this company.

That is why the Titan Group must be characterized by its integrity, transparency and professionalism, these being the principles that must guide the business practices of the group's companies.

At Titan Group we understand that scrupulous respect for the law is fundamental to the success and growth of our company, as well as the active contribution to the improvement of our society, the protection of the environment and, internally, the promotion of equality as well as respect and companionship and, therefore, I encourage all of you to read our Code carefully and to consult it often as a guide of conduct.

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*Titan should be understood as synonymous with **commitment, quality and integrity.***

**Rafael Selma Beltran**  
Governing Body

## I. - Purpose

The purpose of this Code of Ethics and Conduct is to promote that all persons linked to any Titan Group company are guided by behavioral guidelines with the highest level of demand in the commitment to comply with laws, regulations, contracts, procedures and ethical principles.

The aim of this Code of Ethics and Conduct is to set out the values of the Titan Group so that they can serve as a guide for the actions of the people linked to the group's companies, establishing general guidelines for action and behavior that they must observe in the development of their activity.

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The nature of this Code is not intended to cover all possible situations that may arise, but to provide a frame of reference against which to measure any activity. Employees and related persons should seek advice if they have any doubts about the plan of action in a given situation, since each person's absolute responsibility is to “do the right thing”, a responsibility that cannot be delegated.

## II. - To whom it's addressed and applies

This Code is **mandatory** for all persons linked to any Titan Group company, regardless of the type of contract that determines their employment relationship, the position they hold or the geographical area in which they work, as well as for collaborating professionals.

The guidelines of conduct contained in this Code of Ethics and Conduct also affect all investee companies and entities in which the Titan Group has management control. It also applies to the various persons with whom the Group has dealings, whether they are suppliers, distributors, customers, external professionals, company representatives or other business partners, hereinafter referred to as “Subject Persons”.

## III. - Ethical principles

### 1. Legality

Regulatory compliance is always our starting point. The Titan Group is fully committed to complying with all legislation applicable to its business. In addition, it has voluntarily adopted policies and procedures inspired by existing best practices, which complement the criteria and guidelines contained in this Code.

Ignorance of the legislation and regulations applicable to the Titan Group, as well as the argument that it is a generalized infringement, cannot justify non-compliance.

Titan Group's Business Partners are committed to act in compliance with current legislation and maintain ethical behavior based on the Company's principles and values.

### 2.

#### Transparency

At Titan Group we consider it a priority to provide truthful, clear and verifiable information on any aspect of our activity. Therefore, transparency and sincerity are the basis of our communication policy. We act in a transparent manner and we expect all our Business Partners to do so in the same way and with the utmost rigor in the preparation and transmission of information.

### 3.

#### Integrity

Understood as honesty and professionalism, for the Titan Group, ethics and integrity is not an option, it is a conviction of its Governing Body. All persons subject to this Code must fully respect the obligations and commitments assumed by Titan Group in its contractual relations with third parties, as well as the customs and good practices of the places where they carry out their activities. The Titan Group requires its business partners to have zero tolerance for any corrupt or unethical practices or practices that could be construed as bribery, conflict of interest, etc., or any conduct that is unethical or that, although legal, could compromise the reputation of the Organization.

### 4.

#### Professionalism

Titan Group is focused on offering a quality of services above the legally required standards, providing our employees with the necessary resources to promote innovation, development and continuous improvement to achieve the highest quality. All employees must assume the development of their functions with interest, dedication and responsibility, ensuring, in addition, the objectivity required in decision-making and actions, and always seeking efficient and innovative solutions.

### 5.

#### Equal opportunity and non-discrimination

The Titan Group ensures equal opportunities in access to employment and professional promotion, avoiding at all times situations of discrimination or inequality based on birth, sex, race, social or sexual status, marital status, religion, union membership or any other personal or social circumstance. Selection and promotion decisions shall be based on professional merit and the assessments shall be objective and transparent. In particular, it promotes equal treatment between men and women: Titan Group companies facilitate the reconciliation with family life and promote the professional development of women within their teams.

#### “ HOW WE WORK AT TITAN GROUP

- We promote diversity and inclusion by taking into account our differences, respecting and valuing them.
- We provide the necessary accommodations for people with disabilities.
- We make hiring decisions based on a person's skills and competencies.



## IV. - Our commitment to the environment

The Titan Group embraces active environmental protection as part of its social responsibility. We are strongly committed to initiatives to promote environmental responsibility and work to develop our activities in an environmentally friendly manner.

At Titan Group we meet the highest environmental standards in each of our actions and seek solutions that benefit the company and the environment. Therefore, we expect the same from our stakeholders, customers and suppliers, prioritizing the relationship with those organizations that have certifications and environmental management systems and establishing common commitments to environmental sustainability.

Additionally, we voluntarily comply with the **ISO 14001:2015** Environmental Management System Standard, adopt commitments and establish action plans that allow us to continuously improve our environmental performance.

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All persons subject to this Code must make responsible use of natural resources and ensure that their activities have the least possible effect on the environment, for which purpose their activities must be aimed at minimizing waste, encouraging recycling, conserving natural resources and promoting energy saving, among others.

## V. - Our way of working

### 1 • Health and safety in the work environment

The safety and health of its people is a strategic pillar of the Titan Group. To this end, we promote a safe and stable environment, updating occupational risk prevention measures and scrupulous respect for the applicable regulations in this area, in all the places where we carry out our activities. We strive to apply the highest standards, aiming to prevent accidents and reduce them to zero.

All Titan Group employees share the responsibility of keeping ourselves and our colleagues safe, observing strict compliance with occupational health and safety standards.

We must always make responsible use of the equipment assigned to us in the execution of risk activities and disseminate among our colleagues and subordinates the appropriate knowledge, promoting compliance with practices that avoid incidents in the areas indicated, without being tempted to take shortcuts in safety to save time or money.

It is not permitted to work under the influence of alcohol or drugs. In the case of medication that may affect safety in the performance of your work, medical services must be consulted.

#### HOW WE WORK AT TITAN GROUP

- We do not take risks that could endanger the integrity or health of anyone.
- We use assigned protective clothing and equipment whenever necessary.
- We perform our work without being under the influence of alcohol or drugs, including prescription drugs that make working unsafe.

### 2 • Conflict of interest

A conflict of interest occurs when the interests of persons subject to this Code compete with the interests of the Titan Group.

This situation may influence an employee's decisions and cast doubt on the fulfillment of his or her duties and obligations. We will avoid situations that may appear or give rise to conflicts between personal interests and those of the Group, and in case of doubt will inform their hierarchical superiors or the Ethics Channel as soon as possible, so that appropriate decisions can be taken to avoid such situations and preserve the interests of the Group.

Activities outside the Titan Group must not be carried out if they interfere with the responsibilities towards the Titan Group or if they involve a risk to the Group's reputation.

#### HOW WE WORK AT TITAN GROUP

- We inform our manager of any potential conflict of interest and seek advice from the Ethics Channel.
- We remove ourselves from the hiring and procurement process when we have a personal relationship with someone who works for the company and with whom we are negotiating.
- We base our business decisions on the needs of the company and not on our personal relationships.

# 3 • Confidential information

In general, the persons subject to this Code are bound by professional secrecy with respect to the information and data that the Group makes available to them and that they become aware of in the course of their professional activity, whether relating to the Group, other employees, clients or any third party in connection with their relations with the Group.

Non-public information owned by the Titan Group shall, in general, be considered as information for internal use, unless it is confidential or reserved, and shall in any case be subject to professional secrecy, and its content may not be disclosed to third parties, except in the normal course of their work, profession or duties and provided that those to whom the information is communicated are subject, legally or contractually, to an obligation of confidentiality and have confirmed that they have the necessary means to safeguard it.

Information or data whose unauthorized disclosure, outside or within the Group, could cause damage (financial or reputational) or violate any law or regulation shall be classified as confidential.

It is the responsibility of the Group and all its members to put in place sufficient security measures and procedures to protect internal, confidential and reserved information recorded on physical or electronic media against any internal or external risk of unauthorized access, manipulation or destruction, whether intentional or accidental. To this end, Titan Group employees shall keep the content of their work confidential in their dealings with third parties.

Employees and collaborators must protect all non-public information of the group's companies, including contacts, candidate databases and personal information of employees

to price information, commercial or business plans, technical specifications or engineering and manufacturing designs.

The Titan Group complies with current legislation on data protection, respecting the right to privacy and protecting the personal data entrusted to it by its customers, members of staff, suppliers and external collaborators, candidates in selection processes or other persons.

No member of staff may take possession of papers, letters, e-mails or any personal effects, or use technical devices for listening, transmission, recording or reproduction to discover the secrets or violate the privacy of others, without their consent.

It is also forbidden to access without authorization to data or software contained in a computer system or part of it.

It is also forbidden to seize, use or modify without authorization to the detriment of a third party, reserved data of a personal or family nature that are recorded in computer, electronic or telematic files or media or in any other type of public or private file or record.

## HOW WE WORK AT TITAN GROUP

- We access confidential information only on a need-to-know basis and with proper authorization.
- We do not share or access information from insecure locations without taking precautions.
- We ensure that we follow computer security protocols.
- We report a loss or theft of personal data or Confidential Information immediately.



# 4 • Zero tolerance for bribery and corruption

Titan Group does not tolerate any act of bribery or corruption in any form. Persons subject to this Code may not give or accept gifts or presents in the course of their professional activity. Exceptionally, the giving and acceptance of gifts and presents shall be permitted when the following circumstances concur simultaneously:

- They are of irrelevant or symbolic economic value;
- They respond to signs of courtesy or customary commercial attentions; and
- They are not prohibited by law or generally accepted commercial practices.

Subject persons may not, directly or through an intermediary, offer or grant or request or accept unjustified advantages or benefits whose immediate or mediate purpose is to obtain a benefit, present or future, for the Company, for themselves or for a third party.

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In particular, they may not give or receive any form of bribe or kickback, from or by any other party involved, such as public officials, personnel of other companies, political parties, public authorities, customers, suppliers, providers, suppliers and partners.

Where there is any doubt as to what is acceptable, the offer must be declined or, where appropriate, first consulted with the immediate superior or directly with the Compliance Officer.

## HOW WE WORK AT TITAN GROUP

- We refuse to offer, promise, give, solicit and agree to receive or accept a bribe or anything that could be perceived as a bribe.
- We report any form of bribery or corruption to the Compliance Officer or through the reporting channels provided.
- We recall that we may be liable for the actions of third parties working on our behalf.

## 5 • Prevention of money laundering

Titan Group strictly complies with laws and regulations to actively combat money laundering activities.

You may not acquire, possess, use, convert or transfer assets of the Titan Group or its member companies knowing that they originate from a criminal activity, whether committed by persons subject to this Code or by a third party.

Likewise, no action may be taken to conceal or cover up its unlawful origin or to help the person who has participated in the offense or offenses to evade the legal consequences of their actions.

In the event that any situation is detected that may be related to such criminal conduct, it must be reported as soon as possible to your immediate superior or through the Ethics Channel.

Titan Group companies must take care in the correct selection of third parties with whom they intend to establish business links, checking the available information (including financial information) in order to ascertain their respectability and the legitimacy of their activities.

### HOW WE WORK AT TITAN GROUP

- We verify the effective identity of the third party with whom we are going to work: customer, partner, supplier...
- We check the origin of funds received as payment.
- We monitor payments and collections from or to bank accounts, persons or entities residing in tax havens.

## 6 • Accounting and recording of transactions

Titan Group members and associates must properly account for, record and document all transactions, income and expenses, without omitting, concealing or altering any data or information, so that the accounting and operating records accurately reflect reality and can be verified by the control areas and by internal and external auditors.

The documentation of the professional activity must also be kept in compliance with the applicable general regulations, as well as with the standards that are particularly applicable to the particular area of work.

### HOW WE WORK AT TITAN GROUP

- We record transactions as they occur.
- We never destroy, hide or alter files in response to a preservation order or an investigation.
- We collaborate with internal and external control areas, supervisors, auditors, and administrative and judicial authorities, responding to their requests and requirements.

## 7 • Partnership and respect

One of the core principles of Titan Group's values is to respect others and succeed together, and our goals can only be achieved when we treat everyone with respect. We all offer unique perspectives, and our differences help us to better understand how to deliver customer satisfaction.

All relationships between directors, managers and employees at all levels, Business Units and locations must be marked by mutual respect, sincerity and a spirit of trust and cooperation. We must offer and seek opinions and communicate honestly with each other. We are committed to open debate and diversity of opinion.

## 8 • Correct use of the company's resources

Persons subject to this Code must use the company's resources honestly and efficiently, protecting and preserving them from loss, damage, theft or any other illegal or dishonest use. Resources include both physical assets (such as facilities, supplies, equipment, machinery, spare parts, raw materials, finished products, vehicles, company funds, etc.) and intangible assets (company time, confidential information, intellectual property, information systems, etc.).

The obligation to protect company funds is especially important if you have the power to spend or approve travel expenses and entertainment invitations, as well as to manage budgets and accounts.

### HOW WE WORK AT TITAN GROUP

- Treat others fairly, with honesty and respect.
- We seek to bring out the best in each person we work with and help them to fully evolve.

### HOW WE WORK AT TITAN GROUP

- We take care of the Group's facilities, supplies, machinery and products.
- If we are assigned spending powers by virtue of your position, we manage budgets well and use funds appropriately, with authorization when necessary.
- We report any improper use of facilities and equipment.

## 9 • Defense of competition and fair trading

At Titan Group we are prepared to compete successfully in today's commercial world and we will always do so in full compliance with all applicable antitrust and fair trade laws. We compete strongly in the market but always in an honest and loyal manner, achieving competitive advantages through our performance and our own efforts.

Therefore, Titan Group members and associates must at all times adhere to the following rules: Commercial policy and prices shall be set independently and shall never be agreed with competitors or other unrelated parties, either directly or indirectly.

- Customers, territories or product markets will never be allocated between the Titan Group and its competitors, but will always be the result of fair competition.
- Similarly, customers and suppliers will be treated fairly.

### HOW WE WORK AT TITAN GROUP

- We avoid abuse of power or dominant market position.
- We do not enter into discussions or agreements with competitors whose purpose is to coordinate their behavior in the market.

# 10 • We protect our image and reputation

The Titan Group considers its corporate image and reputation as one of its most valuable assets to preserve the trust of its customers, employees, suppliers, authorities, administration and society in general. We are all responsible for the image and reputation of the Titan Group.

The image, name or trademarks of the Group may only be used for the proper development of the professional activity. We will always ensure that our actions do not damage the image and reputation of the Titan Group. The image, name or trademarks of the Group may **NOT** be used to open accounts or register on social networks, blogs or Internet forums, or to provide any kind of advice to customers or third parties on actions, products or services of the Group through these media.

Only the Marketing Department is authorized to open digital channels (social networks, websites, blogs, etc.) on behalf of the Titan Group. **Any publication on social networks containing the Name, the Brand, images of our assets or our facilities, or information concerning the Titan Group, will require prior authorization from the Marketing Department**, and always applying the internal rules of behavior, using good judgment and common sense and taking care of the information that is shared.

## HOW WE WORK AT TITAN GROUP

- We only speak or publish formally on behalf of the Titan Group if we have prior authorization from the Marketing department.
- We make it clear that our opinions and our private social media accounts are personal.
- We ensure that our personal posts are not inappropriate or damaging to the Group, our colleagues or customers.



## VI. - Application of the code

### 1. What do we ALL have to do?

**1. Know and apply** the Ethical Principles and the behavioral conduct guidelines established in this Code.

**2° Consult any doubts** that may arise regarding the application of this Code directly with your supervisor or through the Ethics Channel.

**3° Report any actions** of which you are aware that are contrary to the guidelines of conduct of this Code.

### How can I know if any behavior is **NOT** correct?



If the answer to any of these questions is **NO**, stop and don't do it. Consult with your **superior** or through the **Ethics Channel**.

## 2. Ethical Channel (CE)

### a) Creation

Titan Group has created an **Ethics Channel** in order to promote compliance with the law and the behavioral guidelines established in this Code of Ethics and Conduct, without prejudice to any other mechanisms that may be established to allow the communication of irregularities of potential criminal significance that may be detected within the Company.

### b) Functions

The **Ethical Channel** has the following **functions**:

- Firstly, it serves for persons subject to this Code of Conduct to consult any **doubts** they may have regarding the application of this Code.
- Secondly, it is used to **report conduct** that may involve the commission of any irregularity or any act contrary to the law or to the guidelines contained in the Crime Prevention Program.
- It also serves to make **suggestions** on the adoption of new measures relating to the Code of Ethics and Conduct or the Crime Prevention Plan, or on their application or modification.

### c) Am I forced to use it?

The use of the Ethics Channel is **mandatory** when in doubt as to whether conduct is contrary to the law, ethics, the guidelines set out in this Code or is detrimental to the reputation of the Titan Group. Likewise, anyone aware of a violation of the law, of this Code, of a breach of the ethical parameters or of the existence of conduct damaging to the reputation of the Titan Group **must report** it through the Ethics Channel.

### d) How and where do I communicate?

Persons Subject to this Code may submit queries and communications addressed to the **Compliance Officer** through the Ethics Channel, by e-mail to the address:

**comite.cumplimiento@titanfirefighting.com.**

The message must include all the information to be transmitted and attach all the documentation available to support the query or complaint. Queries or communications may be made by any other means or procedure by which the Compliance Officer is made aware of them: telephone, mail, etc.

In exceptional cases, the employee may communicate directly about the known fact to his or her supervisor verbally. In any case, the verbal communication must be formalized in writing through the means indicated. Anonymous reports are also permitted in accordance with the regulations in force.

### e) Who will receive and manage my communication?

The **Compliance Officer**, the Criminal and Anti-Bribery Compliance Body appointed by the Governing Body of the Titan Group, is responsible for overseeing compliance with this Code, as well as for managing the Ethics Channel and, therefore, all communications and queries received through it.

Among its competences related to this Code of Ethics and Conduct are the following:

- Receive and answer any **queries or doubts** raised by the Subject Persons in relation to the **content, interpretation, application or compliance with the Code of Ethics and Conduct.**
- **Receive, analyze and manage the communications and/or notices of non-compliance with this Code** that are made either through the Ethics Channel or any other means.
- Promoting and directing the procedures for **verification and investigation** of the complaints received, as well as issuing the appropriate resolutions on the files processed.
- **Resolve and/or file** all non-compliance verification procedures.
- Propose to the Governing Body the imposition of **sanctions** and the adoption of **disciplinary measures** that, in accordance with the established system and the labor regulations in force, are considered appropriate.

### f) Can it harm me to report a violation of the Code of Conduct?

Titan Group guarantees that in no case will retaliation be taken against persons who, in good faith, report conduct contrary to this Code or likely to constitute a crime and who cooperate in the investigation, helping to resolve it.

In any case, the confidentiality of the whistleblower is guaranteed in accordance with both national and European legal regulations.

In any case, disciplinary sanctions will be imposed on those who use the Ethics Channel in bad faith to spread false information and harm third parties.

## 3. Disciplinary regime

In the event of non-compliance with this Code, the provisions of current labor legislation and, in particular, the Workers' Statute and applicable collective bargaining agreements, shall be complied with.



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