

CODE OF ETHICS

ALA S.p.A.

CHAPTER I - GENERAL PRINCIPLES

1.1. Purpose of the Code of Ethics

ALA S.p.A. (hereinafter also the "Company"), well-established on the market for approximately 50 years, is a leading Italian company that markets innovative components for the aeronautics industry. Through its subsidiaries, the Company is also actively present on the American market and in other European countries.

This Code of Ethics (hereinafter also the "Code") expresses the ethical principles, shared values and rules of conduct reflected by ALA S.p.A. and its subsidiaries, as well as the ethical and behavioral commitments and responsibilities that they assume and abide by in the exercise of their business activities and which govern the conduct of anyone working in or for the same.

Any reference to the Company or ALA shall, therefore, be extended to include all of its subsidiaries, unless otherwise specified.

1.2. Persons to whom this Code applies

Everyone who works in the interest of the Company - regardless of whether in an administrative, supervisory, subordinate or other position - is subject to this Code. The Code applies to all shareholders (either individuals or entities), directors, members of the supervisory bodies (the board of statutory auditors, control committees, audit or other body) and employees of the Company, as well as everyone who contributes - even intermittently or non-exclusively - to achieve the Company's objectives in Italy or abroad.

1.3. Scope of application and binding nature of the Code

The ethical principles and rules of conduct set out in this Code are binding. Knowledge of and compliance with the provisions of the Code represent a fundamental requirement for establishing and maintaining an employment relationship or collaboration with the Company. In the spirit of absolute

transparency, the Company is committed to disseminating every information related to the Code, also in order to ensure that all Persons to whom the Code applies feel responsible for and participate in the effective application of the same.

An infringement of the principles set out in this Code compromises the relationship of trust established with the Company. Any violation shall therefore be incisively and promptly pursued by means of appropriate and proportionate sanctions and disciplinary proceedings and/or the termination of the relationship in force, regardless of any criminal implications of such conduct and/or the initiation of criminal proceedings.

In the event of a breach of the provisions of this Code, each person shall be subject to the applicable sanctions that are set out in the corporate disciplinary system as far as Directors, members of the control bodies and employees are concerned. The sanctions for collaborators and other Persons are contemplated in specific contractual clauses, which, for the gravest violations, provide for the Company's right to terminate the relationship for breach of contract.

CHAPTER II – BUSINESS ETHICS

The Company operates and pursues its business objectives in accordance with the laws in force. Compliance with applicable laws, company regulations and this Code is of fundamental importance for the Company's optimal operation and good reputation among human resources, the Public Administration, third parties and the market in general.

In the execution of their respective tasks and competences, the Persons to whom this Code applies are, therefore, required to know and observe the laws and regulations in force in all of the countries in which they operate.

2.1. Loyalty, fairness, good faith and compliance with applicable laws

All Persons to whom the Code applies are required to act in compliance with the principles of legality, fairness and loyalty in the exercise of their internal and external duties, also for the purposes of safeguarding the reputation and image of ALA, as well as the relationship of trust that is generally established with its clients and the market.

The Persons to whom this Code applies are required to assume a fair and loyal attitude in the

exercise of their duties and to avoid the pursuit of unlawful or illegal purposes or the creation of conflicts of interests in order to obtain unlawful advantages for themselves or third parties.

Under no circumstance shall the Company's interest or advantage inspire and/or justify a dishonest and/or unlawful conduct.

The Company shall therefore not tolerate any kind of illegal activity nor the participation, collusion or contiguity - even if indirect - with criminal organizations operating on the national or international level.

The Company refuses any kind of relationship, even if indirect or through an intermediary, with persons that are known or suspected to belong to or support any type of criminal organization in Italy or abroad, including mafia-type, human trafficking, child labor or arms trafficking organizations, or with persons or groups that pursue terrorism-related activities.

2.2. Quality of products and services

The Company pays particular attention to satisfying the requests and expectations of its current and potential clients and endeavors to always provide competitive industry products and services, guaranteeing professionalism, innovation and high quality and certification standards. The Company endeavors to provide excellent products and services in terms of their quality, safety, protection of health and the environment and, therefore, requires that everyone who participates in the creation of the products and services offered by the Company is determined to achieve these additional values.

Every information, communication or description concerning the products and services offered by the Company must be accurate, complete and fair.

2.3. Relations with the Public Administration

The Company's relationships with public officials, persons in charge of a public service, civil servants and public services distributors shall be governed by the principles of legitimacy, transparency, loyalty and fairness. Only authorized staff may manage relations with the Public Administration and/or relationships with a public connotation.

Anyone who manages or entertains relationships with the Public Administration in the name

and/or on behalf of the Company is forbidden from favorably treating, exercising pressure or otherwise engaging in conducts aimed at obtaining favorable attitudes or decisions for the Company in an unlawful manner and contrary to the principles of this Code.

The Persons to whom the Code applies are not authorized to offer, accept or promise any gifts, payments, utilities or services - of whatever kind and non-necessarily of financial nature - to any (private or public) person for themselves or for others, aimed at influencing or obtaining a favorable treatment in the performance of their duties. Acts of business courtesy are allowed, as long as these are gifts of modest value and cannot be interpreted as acts aimed at obtaining improper or illegitimate benefits.

In the exercise of its activities and if the requirements are met, the Company may request authorizations and licenses and benefit from funds, incentives and contributions of whatever kind granted by national, European or foreign public entities but these must exclusively be employed for the specific purpose for which they were granted and/or requested. Transparent and accurate documentation regarding the Company and the project and/or service subject of the disbursement must be provided to this end.

2.4. Collaboration during inspections and with the customs authorities

The Company actively collaborates with the judicial, tax, customs, supervisory, police authorities and any public official in the exercise of their functions during inspections, controls, investigations or judicial proceedings. Employees must abstain from offering gifts, money or other benefits or from exercising undue pressure on the representatives of these authorities, the persons actually carrying out the inspections or controls or anyone who may be called to render statements in judicial proceedings, in order to influence their behavior or to undertake any activity that may compromise the proper course of judicial proceedings.

Documents provided to the judicial, tax, customs and supervisory authorities must comply with the principles of accuracy, authenticity and transparency.

2.5. Relations with clients and third parties

Relations with clients and third parties who work in the interest of the Company are managed

in line with the principles of utmost collaboration, availability, professionalism and transparency, in compliance with confidentiality requirements and privacy protection, in order to establish solid and long-lasting relationships based on mutual trust and satisfaction.

Third parties working in the interest of the Company (agents, suppliers, partners, consultants, collaborators etc.) are identified and chosen according to objective, transparent and documentable evaluation criteria pursuant to internally established procedures and based on the principles of utility, fairness and transparency. The relevant fees are determined on the basis of the criteria of the proportionality and effectiveness of the service provision.

During the phases of negotiating, acquiring the order and executing the agreed service, relations with clients must be governed by the principles of transparency, professionalism and good faith.

The Company operates fairly in the offer of its products and services and shall not employ any conduct that may negatively influence or illegitimately alter the system of competition between the various market operators.

As far as relations with foreign entities is concerned, the Company abstains from undertaking any activities that may compromise the integrity, reliability and safety of its own IT or telematic systems and data or those of third parties.

CHAPTER III – PRINCIPLES AND RULES OF CONDUCT IN THE MANAGEMENT OF THE COMPANY

3.1. Protection of the Company assets

The Company is committed to employing the corporate resources and goods in a manner that will protect, increase and consolidate the Company's assets. Each of the Company's employees and collaborators is directly and personally responsible for the protection and preservation of tangible and intangible assets as well as the human, material or immaterial resources entrusted to the same by the Company. The Company's assets shall only be employed and utilized in the interest of the Company for exclusively professional purposes and pursuant to the legislation in force, the By-laws, the principles of this Code and the corporate procedures.

3.2. Administration and Management

The Company's administration and management shall be based on the following principles and rules of conduct:

- full collaboration, transparency, fairness and efficiency in its relations with auditors and supervisory bodies (Board of Statutory Auditors, audit, control bodies etc.), response to shareholder requests and relations with the public authorities;
- diligence, expertise, fairness and accuracy in the preparation and verification of the data and information that is gathered and incorporated in the drafting of the financial statements and related reports, Company communications required by law or external communications;
- prevention to undermine the integrity of the Company's assets in any manner and by any means with the specific prohibition, unless otherwise expressly permitted by law:
 - (i) to return shareholders contributions in any way or to release the shareholders from the obligation to execute the same;
 - (ii) to distribute profits that have not actually been achieved, which the law requires to be allocated to reserve funds or to distribute non-distributable reserves;
 - (iii) to purchase or underwrite shares or quotas of the Company or parent Companies;
 - (iv) to reduce the share capital, to undertake mergers or spin-offs in violation of creditor protection laws;
 - (v) to fictitiously constitute or increase the share capital;
 - (vi) to satisfy the Shareholders' claims in harm of the Company's creditors in the event of liquidation;
 - (vii) to undertake any simulated or fraudulent act aimed at influencing the will to be expressed by the Shareholders' Meeting in order to obtain the irregular formation of a majority and/or to influence a resolution.

3.3. Accounting Records

3.3.1. Accuracy, Transparency and Completeness of Accounting Records

The Company considers truthfulness, transparency and completeness of the accounting

records to be fundamental values of reference.

These benchmarks shall ensure the fair and truthful representation of the Company's economic and financial results pursuant to the civil and tax laws in force, in order to ensure transparent and timely verifications.

All corporate communications, financial statements, company records and, in general, the legally required reports on the economic and financial situation shall be drafted in accordance with the principles of truthfulness, clarity, transparency and fairness and in line with the provisions of applicable laws and principles.

ALA condemns any conduct that is aimed at altering the accounting and corporate information and data that is disseminated inside and outside the Company, to the public authorities and stakeholders.

By means of the Persons to whom this Code applies, each within the area of his/her own competence, the Company shall ensure regular, clear and precise book keeping and, as such:

- guarantees that transparent and timely information is provided to all of the interested bodies and functions, as well as the proper collaboration between the aforementioned business bodies and functions;
- prescribes that in the event of verifications concerning economic and financial aspects, the relevant records shall be prepared in accordance with the criteria of reasonableness and congruity, clearly illustrating the criteria underlying the decisions taken;
- supports the controls on the part of the competent bodies and functions;
- monitors that all operations are duly authorized and adequately documented and that the documentation is kept in a manner to allow bookkeeping, the identification of the different levels of responsibility as well as an accurate reconstruction of the operation at any time;
- ensures that the motivations behind the Company's ordinary and extraordinary operations are specified, also in order to monitor and prevent the possibility that any transfers of funds are connected to illegal activities, such as in support of criminal, mafia-type, terrorist or subversive groups or associations, from which the Company firmly disassociates itself.

3.3.2. Anti-money laundering and cash flow controls

The Company complies with all national or international norms on the prevention of money-laundering, the receipt of stolen goods and the reinvestment of illicit capital in economic activities.

Except as provided by the applicable laws and company regulations, the receipt of significant sums of cash or through anomalous payment methods and the purchase of goods of unlawful or uncertain origin is in any case excluded.

ALA rigorously disciplines the management of cash flows inside the Company and with its subsidiaries in order to trace their origin and destination and to avoid the reinvestment of sums that may originate in unlawful activities.

3.4. Staff policy

The Company considers human resources an indispensable element of its activities and success and adopts a policy aimed at favoring the growth of the professional capacities and competences of each employee and collaborator, so that each individual potential shall be fully realized in the pursuit of the common objectives.

The Company pays particular attention that staff and collaborators are selected and hired in accordance with the criteria of competence and merit, ensuring that the values of equal opportunities and equality are respected in line with the relevant legal provisions, any collective labour agreement and the applicable legislation in the country in which operations take place.

The Company exclusively avails itself of employees that are properly hired in accordance with the applicable legislation, also as far as foreign workers are concerned. As such, no form of irregular or child labor shall be tolerated.

The Company seeks to develop a spirit of belonging to the Company and condemns any kind of discrimination and/or abuse within its internal and external relations.

3.5. Protection of health and safety at the workplace

In accordance with the laws on the protection of physical and moral integrity, the Company assures its employees dignified work conditions as well as safe and healthy work environments in full compliance with human rights, labour rights and applicable laws.

The Company's prevention and safety system provides adequate rules of conduct for managers and employees in order to prevent illnesses and accidents. The Company and the employees work closely together in order to ensure the effective implementation of the highest safety standards, which shall be constantly updated and improved to effectively prevent the risk of accidents and illnesses of the Persons to whom the Code applies or third parties.

All Persons to whom the Code applies shall be kept informed on the prevention and safety system, insofar as applicable to the same, as well as the relevant certificates and integrations. In case of doubts, they shall contact their superiors and/or persons of reference or consult the safety and health manual available at the Company's offices and premises.

3.6. Privacy protection

The Company operates in full compliance with the right to privacy in accordance with the applicable legislation.

The Company only acquires and processes personal information that is necessary and directly related to its functions. Data are stored in a manner to prevent unrelated third parties from taking cognizance thereof and only communicated and divulged in the context of internal procedures or with the prior authorization of the relevant person.

The Company provides its employees, collaborators and third parties with complete and up-to-date information on how the data acquired by the Company in the course of its activities are processed, asking for the release of their informed consent, if necessary, exclusively for the purposes for which they are intended.

3.7. Intellectual property and confidentiality

ALA disposes of its own know-how as well as that made available for the development of its activities.

The information, knowledge or data that is acquired or elaborated by the Persons to whom this Code applies during their work or during the implementation of their tasks belongs to the Company and cannot be used, communicated or divulged without specific authorization.

Under no circumstances may the Persons to whom this Code applies divulge any information

regarding the Company's technical-scientific knowledge and management methods or use these in a manner that may prejudice the Company or other contractual parties.

ALA rigorously respects the copyrights and industrial property rights of its clients, suppliers and partners, as well as those of third parties in general. The Company shall not tolerate that the Persons to whom this Code applies act in a manner that may prejudice these rights.

In consideration of the specificity and relevance of the activities, which the Company's clients undertake, all Persons to whom this Code applies are required to maintain utmost confidentiality. Therefore, they shall not divulge or unduly request information about their clients' documents, know-how, research, purchase and sales projects. In particular, information is considered confidential and secret when they are subject to specific laws or regulations, insofar as they concern, for example, national security, military sectors, inventions, scientific discoveries, protected technologies or new industrial applications, as well as those that are contractually classified.

3.8. Environmental protection

The Company contributes to the dissemination and awareness of environmental protection topics, managing the activities entrusted to the same in an eco-compatible manner in compliance with the legislation in force, both at their offices as well as on every facility where their business activities are implemented.

To this end, the operational management of the Company's activities must refer to the most adequate criteria of environmental protection, waste disposal and energy efficiency on issues of environmental prevention and protection.

3.9. Dissemination of the Code

A hard-copy of this Code shall be provided to all Persons to whom this Code applies. A copy of the same shall be kept by Management and is always accessible on the Company's website.

In order to effectively implement and share this Code, the Company, as far as this falls under its competence, guarantees its maximum dissemination and is committed to providing adequate information tools regarding the contents of the same.

The Code of Ethics is adopted by resolution of the Board of Directors of ALA S.p.A. and,

subsequently, by special resolution of the managerial body of all of its subsidiaries.

Approved by the Board of Directors on July 22nd 2016.