



Montana Aerospace Group
Whistleblower Regulation

23 March 2022



1. General

In accordance with Montana Aerospace's Code of Conduct, employees of Montana Aerospace AG and its current and future subsidiaries (the "**Montana Aerospace Group**") as well as any persons working under the supervision and direction of contractors, subcontractors and suppliers of the Montana Aerospace Group are encouraged and free to report, in accordance with this regulation, any concerns they may have regarding actual or suspected activities which may be illegal or in violation of Montana Aerospace's Policies, with respect to, without limitation, fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, and misuse of Montana Aerospace's assets, as well as any violations or suspected violations of Montana Aerospace's Code of Conduct (the "**Allegations**").

The Montana Aerospace's Code of Conduct requires its employees and representatives to observe high standards of business and personal ethics in the performance of their duties and responsibilities on behalf of the Montana Aerospace Group. The employees and representatives of the Montana Aerospace Group are expected to practice honesty and integrity in fulfilling their responsibilities and are required to comply with all applicable laws and regulations.

The objectives of this regulation (the "**Whistleblower Regulation**") are:

- to encourage and enable employees and representatives of the Montana Aerospace Group as well as any persons working under the supervision and direction of contractors, subcontractors and suppliers of the Montana Aerospace Group, without fear of retaliation, to raise concerns regarding suspected behavior so that the Montana Aerospace Group can address and correct inappropriate conduct and actions;
- to define the procedure for internal reporting of misconduct; and
- to ensure the protection of individuals reporting Allegations from retaliatory actions.

2. Reporting Responsibility

It is the responsibility of all employees and representatives of the Montana Aerospace Group as well as any persons working under the supervision and direction of contractors, subcontractors and suppliers of the Montana Aerospace Group to report in good faith any Allegations in accordance with this Whistleblower Regulation.



3. Acting in Good Faith / No Retaliation

This Whistleblower Regulation is intended to encourage and enable the reporting of Allegations within the organization for investigation and appropriate action. With this goal in mind, no one who, in good faith, reports a misconduct shall be subject to retaliation or shall suffer intimidation, harassment, discrimination or adverse employment consequences because of such report.

Moreover, an employee who retaliates against someone who has reported a concern in good faith is subject to disciplinary actions up to and including dismissal or termination of employment.

The act of making Allegations that prove to be in bad faith and that prove to have been made maliciously, recklessly, or knowingly to be false, will be viewed as a serious disciplinary offense. It may also result in disciplinary actions, up to and including dismissal or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

4. Confidentiality

Any Allegations in accordance with this Whistleblower Regulation, and investigation pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

5. Procedure of a report in accordance with this Whistleblower Regulation

The employees and representatives of the Montana Aerospace Group can report any potential misconduct, if preferred on a confidential and anonymous basis, with the help of the following online tool:

<https://montanaaerospace.integrityline.com/frontpage> (the “EQS-Tool”).

The EQS-Tool contains the option that the identity of the reporting person remains confidential and anonymous and allows to communicate with the reporting person in a secure manner.

6. Investigations of reported misconducts

All Allegations will be promptly investigated; the scope of any such investigation being within the sole discretion of the audit and compliance committee of the board of directors of Montana Aerospace AG (the “**Audit and Compliance Committee**”), and appropriate corrective action will be taken if warranted by the investigation. The compliance officer or any other person to whom this function is assigned to (the “**Compliance Officer**”) will notify the sender and acknowledge receipt of the Allegation within five business days, if possible. It will be possible to acknowledge receipt of



anonymously submitted concerns if the reporting person used the respective communication tools provided by EQS.

The Compliance Officer shall be responsible for investigating and shall report to the Audit and Compliance Committee. In case the Allegations concern the management of any group company the Compliance Officer shall also inform the Management of Montana Aerospace AG.

The Compliance Officer may delegate the responsibility to investigate a reported misconduct and to communicate with the reporting person via the EQS-Tool, to one or more employees of the Montana Aerospace Group or to any other individual, including persons not employed by the Montana Aerospace Group, selected by the Compliance Officer.

The Compliance Officer has the authority to retain outside legal counsel, accountants or any other resource deemed necessary to conduct a full and complete investigation of the Allegations.

Notwithstanding anything herein to the contrary, the scope, manner and parameters of any investigation of a reported misconduct shall be determined by Montana Aerospace's Audit and Compliance Committee in its sole discretion and the Montana Aerospace Group and its employees shall cooperate as necessary in any such investigation.

The Audit and Compliance Committee shall oversee the investigations and report to and make appropriate recommendations to the board of directors of Montana Aerospace AG, with respect to all reported misconducts (the "**Board of Directors**").

The Board of Directors shall decide on the merits of the Allegation based on the report of the Audit and Compliance Committee. Additionally, it will decide whether and how the abuse can be remedied or whether the findings shall be reported to external bodies.

The Compliance Officer of the Montana Aerospace Group is obliged to inform the reporting person of the outcome of the proceedings without undue delay after the conclusion of the investigations, or in case the investigations have not been completed yet about the status of the investigation, within 3 months of its receipt at the latest.

7. FINAL PROVISIONS

This Whistleblower Regulation comes into force on 23.03.2022.