
	CORPORATE COMPLIANCE POLICY CODE OF CONDUCT		Document No.: 013-007
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CODE OF CONDUCT

SL NO	Distribution List
1	All SASMOS & FE-SIL Employee

Revision History

12.10.2015	C	INTELLECTUAL PROPERTY , ITAR & EAR Undertaking portion removed & new procedure made based on Fokker feed back	Rajashekar Rai	Venkatachalam	H G Chandrashekar
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MESSAGE FROM THE MANAGING DIRECTOR

In our company, we are committed to doing business with integrity. We believe in sound economic competition and endeavour to increase our market share by constantly improving the quality of our services. We do not sacrifice our integrity or values to achieve business success.

Our Code of Conduct is about SASMOS being a company where we use our KNOWLEDGE, INTEGRITY and **TEAMWORK** to ensure that ethical behaviour is the basis for all our activities, decisions and to ensure we comply with our legal obligations as a worldwide operating company.

Our Code of Conduct is our license to operate and establishes clear expectations for all of us on how to conduct business in a compliant and ethical manner, we expect everyone to comply with the Code. We also expect colleagues to help each other if we spot potential breaches of the code.

Managers and supervisors lead by example and promote a culture in which common sense and integrity are key. All managers and supervisors ensure that employees know the responsibilities arising from our Code of Conduct.

Use your knowledge, act with integrity and work together as one team! That's how we make sure together that within SASMOS we do business with integrity, act ethically and comply with all applicable laws and regulations.

Jointly we build SASMOS to the best there is, jointly we will protect our brand & organization

I count on all of you!

Chandrashekar H.G
Managing Director


OUR CODE OF CONDUCT

What is our Code of Conduct?

Our Code of Conduct describes the basic principles each employee must observe during his/her daily activities. We are all responsible for compliance with our Code of Conduct and must ensure that compliance with our Code of Conduct forms an integral part of our daily business.

What are our responsibilities?

Our Code of Conduct is about behaviour. Not all situations you may encounter as an employee are described. It is therefore essential to always use your common sense and to judge in a business-like manner (use your **KNOWLEDGE**).

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We expect each employee to do his/her work to the best of his/her abilities, taking into account all SASMOS interests, and to act in line with our Code of Conduct, all applicable laws and regulations, as well as all other Organisation policies and procedures (act with **INTEGRITY**).

Read our Code of Conduct carefully and, in case of doubt in concrete cases, discuss it with your colleagues or ask advice from your manager, a Compliance Officer or a Confidant. You must DO it, but you DO NOT have to do it ALONE. Work together as one **TEAM!**

A detailed description of what is expected from us can be found in procedures referred in next pages.

To whom does our Code of Conduct apply?

Our Code of Conduct applies to everyone in our organization: our Board of Management, other board members, MT members and all employees worldwide. We also demand compliance with our Code of Conduct from all individuals, entities, agents and others acting on our behalf. In our Code of Conduct all these persons are referred to as 'employee'.

Questions

If you have questions about our Code of Conduct, or if you are in doubt if an activity is in line with the principles of our Code of Conduct, discuss this with a Compliance Officer or a Confidant.

Report

If you suspect or have evidence that an employee does not comply with our Code of Conduct, you should discuss this with him/her, your manager, the next line manager, your HR contact person, a Compliance Officer or a Confidant. If you do not believe reporting to the above persons is possible or suitable, you can file an (anonymous) report through the Ombudsman procedure. Instructions on how to file such a report, can be found on Ombudsman procedure.


PEOPLE

1. We treat each other with respect

We work as a team and we treat our colleagues with respect and fairness. We offer equal opportunities to all employees. All employees are entitled to a working place without any form of harassment. We do not tolerate any form of intimidation or discrimination. This also applies to visitors, customers, suppliers and other people we deal with.

2. We do not tolerate child and forced labour

Under no circumstances shall we tolerate child labour or forced labour.

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3. We respect the right to organization

We respect the right of employees whether or not to be a member of an employee association of choice.

4. We comply with laws on protection of personal data

We acknowledge the importance of protecting your personal data. We shall comply with the applicable laws on protection of personal data.

5. We offer everyone a safe working environment

Work safety is important to us and we have clear rules on health and safety. We aim to minimize all risks and hazards in all our workplaces. We take all necessary precautions to protect the health and wellbeing of all employees, colleagues, visitors, and contractors.

6. We keep our working place free from alcohol and drugs and we are careful with medicines

We do not tolerate being under the influence of alcohol or drugs during working hours and we do not tolerate any alcohol or drugs on our premises. We only tolerate the use of prescribed drugs and other medicines which (may) affect the working performance of the employee, if such medicines are prescribed by a doctor *and* the employee can ensure that his/her work performance is not impaired by the use of this medication. The employee shall take the initiative to discuss the use of medicines with his/her manager if he/she is in doubt about the effects of the medication on his/her working performance.

7. We take care of the environment

We respect the world around us. We use raw materials and other resources efficiently and have procedures to prevent environmental pollution, stimulate recycling and limit waste.

8. We avoid conflict of interests

We are trustworthy and professional and act in the interest of SASMOS. We avoid situations that (might) give rise to a (possible) conflict of interests. If such a situation should arise, the employee should report this to the Compliance Officer or directly to the CCRO.



COMMERCIAL


9. We believe in fair competition

We believe in fair and honest competition that will strengthen our market position by constantly improving the quality of our products and services. We comply with the relevant competition and anti-trust laws.

10. We have zero tolerance for corruption and bribery

We believe that all forms of corruption undermine the norms and values that are essential to the way we want to do business. We prohibit every form of corruption or bribery:

- anywhere in the world,

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- in connection with any kind of business,
- directly by SASMOS personnel or through intermediaries or third parties,
- to government or private individuals.

11. We do not allow facilitation payments

SASMOS views small payments or the provision of small gifts to public officials to facilitate or expedite the execution of their official duties (facilitation payments) as bribes. Therefore all facilitation payments are prohibited. Only in very exceptional circumstances, in a situation of force majeure, for instance in the event of a health or safety emergency, facilitation payments may be allowed if no other option is possible.

12. We comply with the rules on gifts, entertainment and customer travel costs

Reasonable and limited expenditures may be permitted for gifts, business entertainment, customer travel and other expenses directly related to the promotion of products and services or the execution of a contract. We comply with the instructions on this subject. Providing or receiving gifts, expenses for entertainment and travel of third parties will be reported in the Gifts Register.

13. We comply with the rules on donations and sponsoring

We are open to sponsoring provided it complies with the conditions we have set. In no case shall we support political, discriminatory or religious activities.

14. We only do business with partners with comparable integrity standards


We want to build and maintain honest business relations with our customers, our suppliers and other partners, which are based on trust and integrity. We only want to do business with parties that have comparable integrity standards. That is why we screen our existing and future business partners. We screen to determine if restrictive measures apply and to be able to decide if and if so, what business we can do with that party. We are extra careful with conducting business with parties in countries that pose an increased risk and we have specific rules in place for these situations.

15. We have strict rules regarding agents

Agents and other parties acting on our behalf must comply with the same integrity standards we apply to ourselves. Therefore we have strict rules on engaging agents or other representatives and the renewal of existing contracts.

16. We comply with import and export laws and regulations

We comply with all import and export laws and regulations applicable to us. Because we are a worldwide operating company, we purchase and deliver products and services from and to parties all over the world. Since we are also active in defense markets, it is very important that we strictly comply with all laws and

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regulations applicable to our import and export activities. Therefore we have strict export compliance policies and procedures.

17. We work together with government regulators when requested

If government regulators request us to disclose our business processes and data, we work with them as the law requires.

COMPANY

18. We are careful with proprietary, confidential and secret information

We act carefully and professionally with regard to proprietary, confidential and/or secret information which we peruse through our work at SASMOS, including personal data or data from our customers, suppliers and other business partners. We classify information in accordance with the applicable procedures and comply with the security provisions pertaining to the information classification.

19. We use company property carefully

SASMOS time and property are not intended for the personal gain of employees or third parties. Under certain circumstances, personal use of certain SASMOS property may be justified. Use your common sense and always check the relevant rules and regulations, in order to be sure that SASMOS property is used properly.

20. We protect our intellectual property

We are all responsible for protecting both our own brands, innovations and other intellectual property rights as well as the intellectual property rights provided to us by our business partners. We use these carefully and professionally.

21. We adhere to the rules on business travel


Travelling to certain countries and taking SASMOS IT equipment (e.g. laptop, phone, tablet) there is subject to strict rules, in order to prevent unauthorized data transfer.

22. We do not trade on insider information

If we have learned through our work for SASMOS of non-public information relating to a listed company, including our customers and suppliers, we will not pass on this information to third parties, nor use it ourselves to trade in securities of that company or gain any other benefit therefrom.

23. We do not communicate about SASMOS to the press

We always adhere to the media policies laid down in SASMOS. No employee is permitted to give any information about or in relation or represent from SASMOS without prior approval from the Management.

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24. We use social media wisely

When posting messages on our own accounts on social media, we make clear that we do that personally and not on behalf of SASMOS. We do not place confidential or proprietary information, including images, about SASMOS, our customers, suppliers or other business partners on social media and we act wisely and respectfully with regard to this information and colleagues.

25. We use e-mail, intranet and internet wisely

We limit the use of SASMOS e-mail and internet to business purposes as far as possible and we will not use private e-mail for business purposes. Sending e-mail messages of a threatening, sexually intimidating, racist, political or religious nature is not allowed. Downloading programs is only allowed after explicit approval from the IT Manager. Illegal downloading is strictly forbidden.

26. We maintain accurate records

Our shareholders, business partners, and the government as well as government regulators rely on the accuracy and completeness of the information and business records within SASMOS. We therefore have a responsibility to ensure that the information we process and provide is accurate, timely, complete, fair and understandable. We shall not create or participate in the creation of records that mislead anyone or conceal any improper activity.

Whether it comes to filing cost reports, preparing financial reporting, keeping our time sheet or the administration of a program, we are always honest and complete.

We comply with the law, generally accepted accounting principles and record keeping procedures within SASMOS, including the rules on storing, archiving and destroying data.

Reviewed and approved by

Chandrashekar H.G
Managing Director