

PILATUS AIRCRAFT LTD CODE OF CONDUCT



PILATUS

Preface

Dear employees,

The success and worldwide reputation of Pilatus Aircraft Ltd ("Pilatus") are based on the decades-long development of know-how and the strict quality requirements applied to our products and services. Wherever high reliability, minimal maintenance costs and excellent flight capabilities are called for, Pilatus aircraft are in action. This image is a sign of quality which shall both motivate and obligate all employees.

To ensure we continue to meet our ambitious goals and requirements in the future, we must maintain a high level of professionalism in all our activities. Each employee must demonstrate irreproachable, responsible conduct in all dealings with colleagues, customers and business partners and in public.

This Code of Conduct is the result of our endeavours in this respect. It describes the behaviour we expect from our employees. Please read the Code of Conduct carefully; as individuals, we are all responsible for ensuring compliance with it.

In the course of business, situations may arise which are not fully covered by the Code of Conduct. In such circumstances, the Code of Conduct shall be applied accordingly. If you have any questions, or are uncertain about anything in connection with the Code of Conduct, please contact your line managers or the Compliance Officer at any time.



Oscar J. Schwenk
Chairman



Markus Bucher
CEO

Table of Contents

Preface.....	1
Table of Contents	2
Vision	3
1 Purpose.....	4
2 Applicability	4
3 Responsibilities/Procedures	4
4 Compliance with the Law	5
5 Safety and Quality of Products and Services	5
6 Occupational Safety and Health Protection	5
7 Discrimination and Harassment	5
8 Fair Competition	6
9 Data Protection	6
10 Environmental Protection.....	6
11 Bribery and Corruption.....	6
12 Gifts and Entertainment.....	7
13 Contributions to Political Parties.....	8
14 Conflicts of Interest	8
15 Financial Participation.....	8
16 Company Assets and Information.....	8
17 Insider Information	9
18 Money Laundering	9
19 Company Representatives.....	9
20 Recording Obligations	10
21 Training and Controlling.....	10
22 Sanctions	10
23 Effect.....	10
Annex – Questions and Answers on the Code of Conduct	11

Vision



VISION

Unsere Kunden bevorzugen uns als ihren kompetenten Partner, weil wir sie kennen und verstehen.



Our customers prefer us as their competent partner because we know and understand them.

Wir Mitarbeitenden prägen Pilatus als starkes, unverwechselbares und international ausgerichtetes Schweizer Unternehmen.



We, the employees, make Pilatus a strong, distinctive, internationally-orientated Swiss company.

Wir sind fähig, Flugzeuge zu entwickeln, herzustellen, weltweit zu verkaufen und während der gesamten Lebensdauer zu unterhalten.



We have the skills to develop and manufacture aircraft, sell them worldwide and provide maintenance services through their entire life cycle.

Wir schützen unsere Umwelt aktiv durch umweltfreundliche und nachhaltige Entscheide bei allen Tätigkeiten.



We engage in active protection of our environment through choosing sustainable, eco-friendly solutions across all our activities.

Wir wollen mit unseren Aktivitäten finanziellen Erfolg und investieren die erwirtschafteten Mittel in die Zukunft.

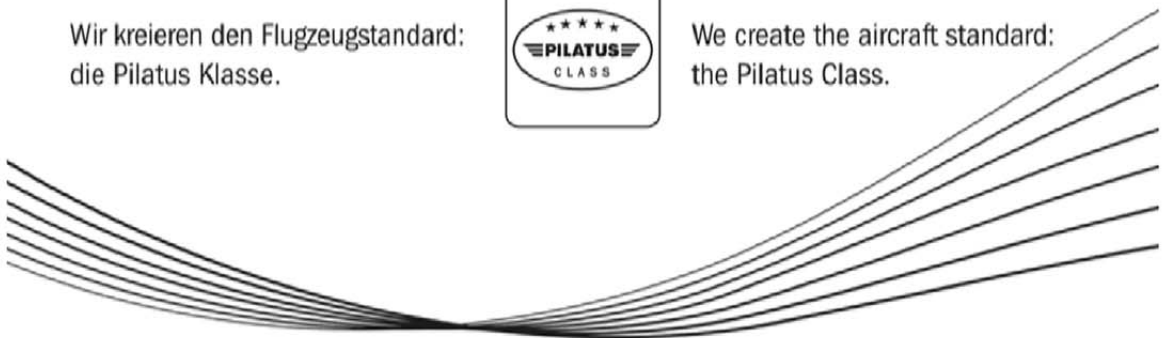


We want our activities to bring us financial success and we invest what we earn in our future.

Wir kreieren den Flugzeugstandard: die Pilatus Klasse.



We create the aircraft standard: the Pilatus Class.



1 Purpose

The provisions of the Code of Conduct and our in-house regulations form part of the Corporate Governance structure of Pilatus.

The Code of Conduct provides a guideline for all current and future Pilatus in-house regulations. The Code of Conduct refers to individual in-house regulations where appropriate. Employees shall apply and interpret these and all other Pilatus rules within the meaning of the recommendations and prohibitions set out in the Code of Conduct.

Adherence to these rules of conduct and compliance with all applicable laws and requirements has highest priority in the conduct of our business activities.

Since this Code of Conduct follows the Global Principles of Business Ethics for the Aerospace and Defence Industry, it represents a contribution to business integrity in the aviation and space industry.

2 Applicability

The Code of Conduct is binding upon all employees of Pilatus, its subsidiaries and *Joint Venture* partners. The Code of Conduct shall be provided to every employee as an **integral part of the employment contract**, and is also available on the intranet.

We also expect our **contractual partners** (namely suppliers, service providers, consultants and agents) to adhere to our Code of Conduct in the performance of their contractual activities. To this end, our rules of conduct shall also be brought to their attention.

3 Responsibilities/Procedures

We require all **line managers** and **contractual partners** to inform their employees of these rules of conduct and to create a working environment which guarantees the integrity of business practices.

Any breaches of this Code of Conduct and/or the applicable legal provisions are to be **reported** to the line managers or the Compliance Officer.

Employees should immediately report any suspected violations to the Compliance Officer who will independently decide on the initiation of a comprehensive investigation. Employees should not hesitate to report violations out of fear of reprisals or acts of retaliation. At some companies, fear of reprisal has led some employees to report their concerns to government officials before informing their own employer of their observations. This can lead to government investigations and expensive litigation. Pilatus therefore encourages all employees to report suspected violations directly to the Compliance Officer before informing any government authorities.

Employees who report violations of law and/or breaches of the Code of Conduct in good faith will not be disadvantaged or punished as a consequence unless they have committed violations themselves. This also applies to employees of subsidiaries and affiliate companies of the Pilatus Group, irrespective of their function.

In case of **questions about the interpretation or application** of the Code of Conduct, or with regard to reporting suspected breaches of the rules set out in the Code of Conduct and/or the applicable legal provisions, please contact your line managers or the Compliance Officer (compliance@pilatus-aircraft.com).

4 Compliance with the Law

Employees of Pilatus, its subsidiaries and Joint Venture partners are obliged to comply with the legal requirements in their country and abroad in the execution of business decisions and actions.

All employees are obliged to keep themselves informed of all applicable laws and in-house rules relevant to their professional activities. Executive Management will provide for the necessary information, instruction and training.

5 Safety and Quality of Products and Services

Safety, highest quality and continuing improvement of quality are essential to the company's growth and success. Employees should strive to meet the expectations from our customers, internal and external, and ensure ongoing improvement of the quality of Pilatus products and services. Compliance with all safety standards and applicable legal requirements shall be ensured during development, production, delivery and provision of after-sales support. Any concerns in relation to the safety or quality of our products are to be reported as required. Please refer to the Pilatus Safety Management System (SMS). Reports may be made via occurrence@pilatus-aircraft.com.

6 Occupational Safety and Health Protection

Pilatus is committed to occupational safety and health protection in the workplace (see Terms of Employment). For that reason, all employees must have knowledge of, and comply with, all statutory and in-house rules on occupational safety and health protection. Any concerns regarding safety and/or health issues should be reported to the line managers or the responsible departments. Please refer to the Pilatus Safety Management System (SMS). Reports may be made via occurrence@pilatus-aircraft.com.

7 Discrimination and Harassment

Pilatus prohibits any kind of discrimination or harassment due to race, sex, religion, age, nationality, civil status, political opinion, sexual orientation, social origin, physical, intellectual or other characteristics. This prohibition of discrimination also applies to the selection, employment, care and management of employees.

Employees are obligated to treat each other, and third parties, with fairness, politeness and respect. **Sexual harassment, mobbing** and other harassment at work are strictly forbidden. Pilatus will not tolerate retaliation against anyone for making good faith reports of harassment, or for participating in internal investigations in relation to harassment.

8 Fair Competition

Pilatus supports fair and open competition. Compliance with the applicable competition laws of the countries in which we do business shall be ensured at all times.

Compliance with competition laws of all agreements with competitors and/or other market participants shall be verified prior to conclusion. This specifically applies to the allocation of customers or markets, unjustified limitations of service, boycotts of selected companies or organisations, exclusivity clauses, agreements on pricing/price discrimination, territorial restrictions and other agreements or business practices which may limit competition, but also to the exchange of sensitive commercial information with competitors.

9 Data Protection

Personal data shall only be collected to the extent that such collection is legal and justified for business reasons. Such data shall only be made available to persons who have a need to know for the performance of their tasks. Employee privacy shall be respected and protected when collecting and processing highly sensitive data. Compliance with applicable data protection legislation must be ensured.

10 Environmental Protection

It is a basic concern of Pilatus to protect the environment for present and future generations and to meet all applicable environmental protection regulations. All questions and reports regarding environmental matters must be submitted to the Pilatus Occupational Health and Safety Officer. Pilatus has been certified ISO 14001 and it expects and supports environment-conscious conduct from its employees. This applies in particular to the use and development of new production and assembly technologies which conserve natural resources, allow recycling, reduce pollution and preserve the natural environment.

Pilatus employees shall fulfil their duties in compliance with all applicable environmental regulations and measures that serve the protection of the environment, other employees and the general public. It must be ensured that all required environmental permits are filed with the relevant environmental authorities and that all appropriate drawings, plans, guidelines and other environmental documents are obtained in good time. Documents to be prepared in accordance with the applicable environmental regulations for the protection of the environment shall not be altered, destroyed or removed, and strict compliance shall be ensured with all provisions regarding the archiving of such documents. In the event of any release of hazardous substances, immediate action must be taken to recover these substances and carefully store and/or dispose of them. Any release or spill of hazardous substances shall be reported to the line manager without delay. If required under the applicable laws, such incidents shall also be reported immediately to the competent environmental protection authorities.

11 Bribery and Corruption

Pilatus does not tolerate bribery or corrupt business behaviour. All employees are strictly prohibited from offering or promising, directly or indirectly, unlawful pecuniary benefits of any kind (such as

improper payments, payoffs, kick-backs, discounts or other improper benefits) to public officials, private persons or companies in order to conclude business transactions, obtain services or an unlawful advantage, or to influence their business decisions. Employees are also prohibited from accepting or receiving promises of any sort of unlawful advantage from public officials, private persons or companies. This also applies to direct family members. In particular, it is strictly prohibited to circumvent these rules by involving third parties, eg by means of agreements with support service providers, consultants, agents and advisors in any form whatsoever.

Pilatus intends to help prevent international corruption through strict procedures regarding the selection, training and supervision of the activities of its international representatives.

12 Gifts and Entertainment

Employees should not make or accept gifts of money or other non-cash benefits (eg vouchers) to **authorities, officials, private persons or companies** with whom business relationships exist or may be entered into.

Gifts (eg flowers, gift baskets, wine, boxes of chocolates), entertainment (eg invitations to meals and sports events) and favours **to or from customers and contractual partners** are only allowed within an accepted level of local custom and reasonableness and to the extent that they comply with local business practices, do not violate applicable laws, in-house Pilatus rules and/or ethical standards, and do not have any influence on business decisions. Gifts, entertainment and favours should therefore be chosen such that the recipient is not embarrassed to accept them, is not prompted to keep their acceptance secret, is forced into a position of obligatory dependence and any appearance of dishonesty or incorrectness is avoided. In case of doubt, employees may seek advice at any time from their line managers or the Compliance Officer (compliance@pilatus-aircraft.com).

Gifts, entertainment and favours shall be considered customary and reasonable in principal if their value is **less than CHF 100 per person and event** and are made on an occasional (not regular or frequent) basis. There is no need to report or seek approval for such gifts, entertainment and favours. Gifts, entertainment and favours which would be considered unusual or unreasonable should generally be refused.

All gifts, entertainment and favours of a value of **CHF 100 and more per person and event** must be notified to the line manager before presentation or immediately after acceptance. In this case, written consent from the line manager is always required for the presentation or acceptance of such gifts, entertainment or favours.

Gifts, entertainment and favours of a value of **CHF 1,000 and more per person and event** must also be approved by the CEO before presentation or immediately after acceptance.

In certain countries and cultural circles, it may be considered unusual and impolite to refuse a gift of a value of CHF 100 and over. In this case, Executive Management may allow an exception.

13 Contributions to Political Parties

Payments and donations to political organisations, parties, committees or individual politicians for the purpose of supporting political interests are prohibited in principle. Payments or donations to Swiss political organisations, parties, committees or individual politicians require the consent of the Chairman.

14 Conflicts of Interest

Employees shall make best efforts to avoid situations in which their own personal and financial interests may be in conflict with the interests of Pilatus.

Private and business expenses shall be kept strictly separate. Where such differentiation is not possible, the employee shall bear all such expenses, in particular those for entertainment and gifts. In case of doubt, a member of Executive Management shall take a decision.

Such conflicts of interest may arise through eg other employment, board director mandates, operational functions or financial acquisitions in other economic enterprises or acceptance of public office, and circumstances such as these must therefore be notified to the line manager. In case of doubt, a decision shall be taken by a member of Executive Management.

15 Financial Participation

Employees and their direct family members may not acquire, directly or indirectly, interests in other companies which maintain or are in the process of developing business relationships with Pilatus without the prior consent of Executive Management. Such consent is not required for the acquisition of interests with no impact on activities at Pilatus.

16 Company Assets and Information

Employees shall protect all Pilatus assets, tangible and intangible, and use them in a careful and professional manner. Tangible assets include, but are not limited to, company-owned plant, tools, warehouse stocks, office equipment and systems, including hardware and software. Intangible assets and intellectual property include, but are not limited to, patents, trademarks, designs and copyright rights.

Business secrets and information about Pilatus, its products, customers, information belonging to business partners protected under intellectual property law, including information about services, technologies and strategies, shall always be treated as strictly confidential. The same also applies to all other important matters regarding the company such as financial information, information on the acquisition of other companies, the sale of important business units or subsidiaries, changes in the management, technical developments and inventions, the conclusion or failure of important contracts. Anyone who discloses such confidential information to third parties (including direct family members and friends) without proper authorisation will be liable to criminal prosecution. This duty of confidentiality shall extend beyond the term of the employment relationship.

Each employee therefore undertakes to take the necessary precautions to protect business secrets and confidential information of Pilatus. Wherever possible, such secrets and information shall be protected by non-disclosure agreements and registration of intellectual property rights.

Company property and business secrets may not be used or utilised by employees for personal benefit without the prior written consent of Pilatus.

Computers and telecommunications equipment may generally be used solely in the fulfilment of professional duties, and never for improper or unlawful purposes. Full details are provided in the ICT End User and Information Security Regulation.

17 Insider Information

Employees are strictly prohibited from using any insider knowledge about confidential information on Pilatus or any business partner with whom Pilatus intends to enter a strategic alliance, or participate in an acquisition, divestment and/or merger in connection with the acquisition and/or sale of shares or derivatives of such partners, or otherwise deal in such shares or derivatives. Employees are also prohibited from disclosing such knowledge and information to third parties.

Confidential information within the meaning of these provisions shall mean insider information, the disclosure of which might influence the value of shares, derivatives and other securities of the involved companies. Information or data available to the public shall not be considered as insider information.

18 Money Laundering

Pilatus strives to comply with all applicable requirements in relation to money laundering. To this end, we take appropriate measures to verify the legality of the activities and the origin of assets of customers and contractual partners.

19 Company Representatives

Contractual relationships may only be entered into with persons who comply with the requirements of this Code of Conduct. Careful prior investigation of the professional qualifications, experience and, in particular, personal integrity, shall be recorded.

Before conclusion of a contractual relationship, a member of Executive Management shall meet with the future company representative to present and explain the Code of Conduct and specifically point out the position of Pilatus regarding the rejection and condemnation of any form of bribery and corruption.

On conclusion of a contractual relationship with a company representative, that latter shall sign a written agreement regarding the explicit prohibition of bribery payments. This Code of Conduct shall form an integral part of the written agreement.

All agreements with company representatives shall be made in writing in the form of a Pilatus Support Services Agreement. They shall be signed by the CEO and a member of Executive Management and ratified by the Chairman of the Board of Directors of Pilatus.

Payments to company representatives shall be recorded in such a way that all transactions are easily traceable (paper trail; evidenced by receipts and other documents).

20 Recording Obligations

All business transactions shall be correctly and fully recorded. Each business activity shall be registered in such a way that the respective activity is completely transparent for accounting purposes at all times, and allocated to the person(s) who authorised the transaction and bears responsibility for it. Off-the-books accounts and other secret accounts not available for inspection by external auditors are strictly prohibited, as are false or misleading entries.

21 Training and Controlling

Executive Management will provide for the instruction and **training** of employees in the content of this Code of Conduct as appropriate.

Compliance and enforcement of the provisions of the Code of Conduct will be **supervised** by the Compliance Officer. The Compliance Officer will be named by the Chairman and shall report directly to the latter.

22 Sanctions

Pilatus will impose disciplinary sanctions and/or sanctions under labour law, including termination of employment without notice, in addition to applicable penal sanctions, on employees who fail to comply with this Code of Conduct.

23 Effect

This revised Code of Conduct shall come into effect on 1 March 2018, replacing all previous versions, in particular that of 28 January 2010.

Annex – Questions and Answers on the Code of Conduct

BINDING CHARACTER, CONTACT, PROCEDURES

1 Do I have an obligation to comply with the Pilatus Code of Conduct?

Pilatus requires you to have read and understood the Code of Conduct and that you contact your line manager or the Compliance Officer in the event of doubt or uncertainty. Strict adherence to the guidelines set out in the Code of Conduct is required. Any deviations must be approved on an exceptional basis by your line manager or the Compliance Officer.

2 Whom should I contact if I am uncertain about the interpretation of the Code of Conduct?

Your line manager will be able to answer most of your questions. In the event of remaining doubt or in case of conflicts of interest you are supposed to contact the Compliance Officer directly (compliance@pilatus-aircraft.com).

3 How can Pilatus ensure that the Code of Conduct is followed by all Pilatus employees and representatives worldwide?

Responsibility for monitoring the Code of Conduct lies with the Compliance Officer, who supervises the worldwide activities of Pilatus employees and representatives. He will initiate an internal investigation if he observes breaches of the Code of Conduct or receives reports of such breaches, providing there is justified suspicion of such a breach. The Compliance Officer decides if, and to what extent, line managers or other persons should be involved. The Compliance Officer will then report the incidents to the Chairman.

4 To whom shall I report breaches of the Code of Conduct?

Please report your observations regarding breaches of the Code of Conduct to your direct supervisor. If this is not possible or not practical for some reason, eg in case of mobbing, discrimination and other harassment at work, you should report such information directly to the next higher ranking superior or, should this also not be practical, to the Head of your Unit or the Compliance Officer (compliance@pilatus-aircraft.com).

Any breaches of environmental rules and regulations must be reported to the Pilatus Safety Manager (occurrence@pilatus-aircraft.com).

COMPETITION

5 What is the purpose of the legal provisions regarding fair competition?

Distortions of competition as a result of arrangements between suppliers for the purpose of influencing market prices are to be avoided because they harm the interests of consumers and the entire economic system. An efficient market economy depends to a large extent on free and fair competition, the long-term securing of favourable prices, high quality products and technological progress. Achievement

of these goals depends on sustained action to combat the negative impact of unobstructed market arrangements and unscrupulous exploitation of monopoly positions.

6 Are business partners such as consultants, agents and other intermediaries required to adhere to the Pilatus Code of Conduct?

Business parties will be required to give an undertaking of adherence to the Code of Conduct during initial discussions. This undertaking will be recorded in writing in any agreement with the business partner.

CONFIDENTIALITY

7 What are business secrets?

Business and manufacturing secrets relate to technical or commercial matters of a certain importance for our business success, eg research and development, construction projects, formulae, know-how in relation to price calculations, procurement sources, distribution channels, agreements with suppliers and customers. They include information and data which Pilatus would not normally disclose to third parties because such disclosure would reduce our competitiveness or provide third parties with undeserved competitive advantages. Such information and data may be contained in written reports, files, offers and electronic data carriers. Disclosure may also take place verbally. Information or data containing business secrets are not always marked as confidential.

8 Who owns business secrets and who is authorised to use them?

Business secrets such as financial and market data, information on inventions, technical specifications, software, information on customers, employees and suppliers, and other data which should be kept secret and which have been created by Pilatus employees or acquired by Pilatus from the author under a valid legal transaction, belong to Pilatus or possibly to third parties, eg if the right to use specific know-how has been transferred under a licence agreement. Only such third parties and Pilatus, or Pilatus employees, may use these business secrets in the course of their professional duties. The scope and content of user rights are set out by Pilatus or defined in the agreements with the respective third parties.

9 May I accept confidential information which is owned by a third party, but offered to me by a Pilatus business partner?

Information and data obtained illegally may not be used by the receiving party who, by doing so, may render himself liable to criminal prosecution. In case of doubt, you should discuss the matter with your line manager or the Compliance Officer.

10 What are my obligations to Pilatus beyond any termination of my contract of employment?

Each employee has certain obligations towards his employer beyond the termination of the employment contract. In particular, he may be held personally liable if he discloses business secrets or otherwise breaches his employment-related obligations of loyalty and secrecy. He may not, therefore, continue to

use information and data available to him during his employment with Pilatus in any new employment relationship.

DATA PROTECTION

11 Which personal data on former employees are collected by Pilatus?

Application documents, employment contracts including any amendments and additions, interim employment references, personal documents and other items such as the minutes of meetings, warnings are archived in each employee's personal file. Personal data such as name, address, date of birth, place of origin, information on the family and salary of each employee are stored in the Pilatus staff information system.

12 Which personal data on former employees are transferred to future employers?

No personal data on former employees will be transferred to future employers. During job search, verbal information only may be provided upon the jobseeker's request.

CONFLICTS OF INTEREST

13 What does the term "conflict of interest" mean as used in the Code of Conduct and how does this apply to my professional and private life?

If the personal interests of any employee affect the correct and full performance of his employment obligations, one may generally assume a conflict of interest. The acquisition of shares in a Pilatus supplier or a close kinship or friendship with decision-makers in other companies which maintain a business relationship with Pilatus may influence the employee in his decisions. In such cases, the employee should disclose his personal interests to his line manager or the Compliance Officer. The line manager or Compliance Officer will then decide on how to proceed.

14 Would the acquisition of shares in a Pilatus competitor be considered a conflict of interest?

As a general rule, any employee may acquire shares in a listed competitor without restrictions, as long as the shareholding is insignificant compared to the employee's net assets and does not influence his duties as an employee in any way. The acquisition of shares in smaller unlisted companies which maintain a business relationship with Pilatus or compete with Pilatus must be avoided. In any event, such a shareholding must be disclosed to the line manager or the Compliance Officer. Again, the employee must use his own good judgement and experience to decide if there is a conflict of interest.

15 Being an employee of Pilatus, may I work as an advisor or employee for other firms which need my special experience and knowledge?

As a general rule, any additional work for other companies as an advisor or employee must be discussed openly with your line manager before entering into such an engagement. Additional work which

may affect the correct performance of the duties to be carried out by the employee, or lead to conflicts of interest, must be avoided.

GIFTS, INVITATIONS, TRAVEL

16 How should I react if I or a very closely related person am/is given gifts by a company which I am visiting on behalf of Pilatus?

You should refuse valuable or otherwise generous gifts unless this is likely to cause offence by going against the local customs and notions of politeness in certain countries and cultural circles. Whatever the case, gifts representing an economic value exceeding **CHF 100** must be reported to your line manager.

17 May I collect Frequent Flyer miles and accept similar bonus gifts from other companies?

Bonus gifts without monetary value and which cannot be traded may be used to the extent that such special offers do not influence the employee in his business travel plans and other professional duties. In case of doubt, you should contact your line manager.

18 What specific rules apply to business travel and invitations?

Pilatus pays hotel expenses for its employees in accordance with the Expense Regulations. Pilatus employees will therefore refuse any offers by companies visited to pay for hotel expenses. Restaurant invitations may be accepted provided that such invitations are not one-sided. In the event of repeated restaurant invitations, the Pilatus employee shall pay the bill on an alternate basis.

19 In certain countries, an exchange of business gifts is customary and expected. Does the Pilatus Code of Conduct allow for these special situations?

The Code of Conduct takes account of customs, traditions and laws in other countries. It allows sufficient flexibility to adapt to local circumstances. In case of doubt, you should consult your line manager or the Compliance Officer.

ACTIVITIES

20 May I undertake political activities or fulfil my duties as a member of a public authority on the premises of Pilatus?

Pilatus supports and encourages the acceptance of public duties and the undertaking of political activities in public matters outside the contractual working hours provided that such activities are undertaken outside the Pilatus premises and are fully and openly disclosed to Pilatus.

CORRUPTION

21 The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions prohibits the payment of bribes to representatives of foreign governments. Does it also apply if an agent or other intermediary negotiates with a foreign government on behalf of Pilatus?

Yes, the Code of Conduct does not allow payment of bribes, irrespective of the channels and relationships used to make the payment.

22 Do we ask external support service providers abroad if they have ever paid bribes to officials before entering into agreements with them?

Pilatus may suffer serious and irreparable damage as a result of doubtful personal integrity of business partners such as consultants, agents and other intermediaries. It is therefore in Pilatus's best interest to examine the good standing and reputation of its external support service providers before entering into a business relationship with them and to make sure the future business partner has never been involved in any cases of bribery. Close checking of personal integrity is a must.

23 Can the Pilatus Code of Conduct have any influence on the correct behaviour of our employees and business partners abroad, eg consultants, agents and other intermediaries?

Pilatus will monitor compliance with the Code of Conduct by its employees and business partners worldwide, such as consultants, agents and other intermediaries, and will pursue or prosecute breaches of the Code of Conduct if necessary. This will ensure enforcement of the Code of Conduct domestically and abroad.

All consultants and companies engaged to work for Pilatus must sign a corresponding undertaking before the conclusion of any agreement with them.

DISCRIMINATION

24 In certain countries, religion or local customs and traditions may lead to discrimination on the grounds of race, colour, sex or religion. How should employees behave in such situations?

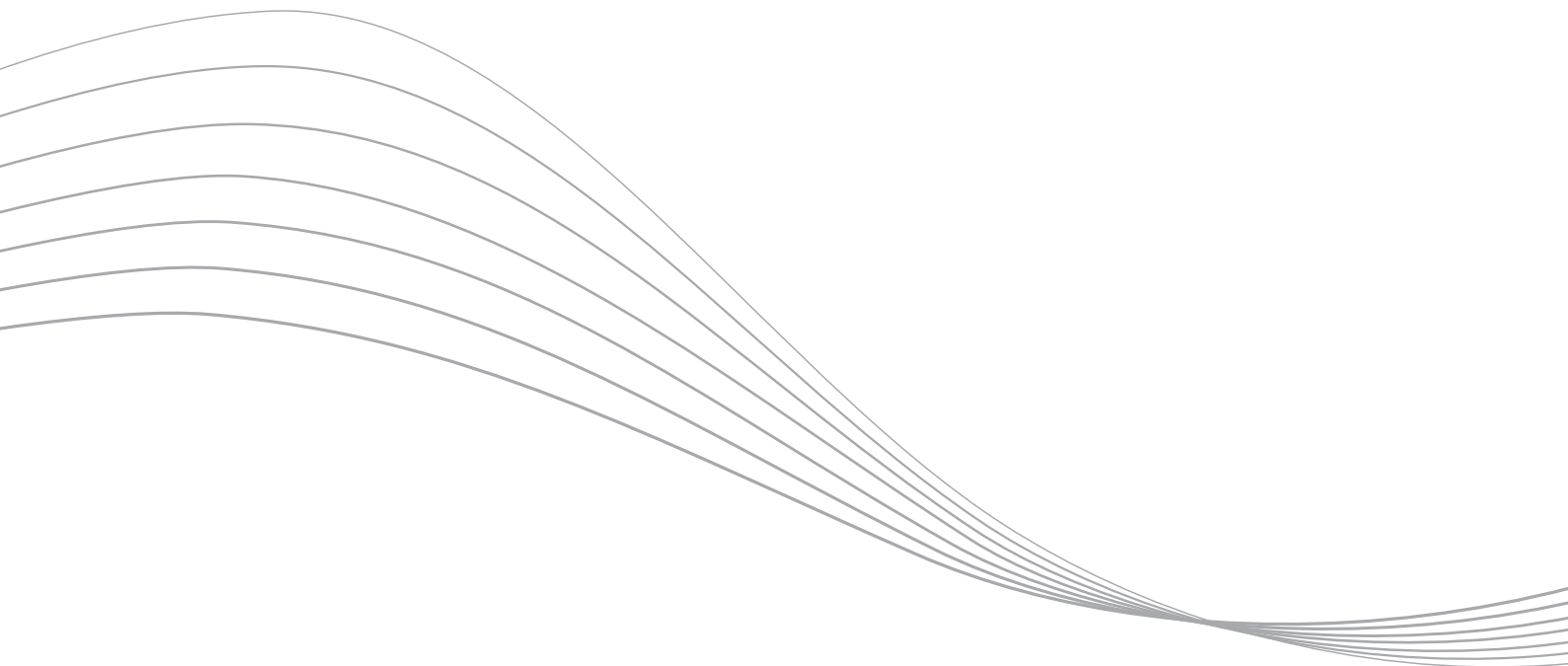
Local laws prevail over the Code of Conduct. On the other hand, the Code of Conduct prevails over local customs, tradition or religious rules. In the event of discrepancies between the Code of Conduct and local customs and traditions, check with the Compliance Officer whether strict compliance with the Code of Conduct may be waived exceptionally.

25 What is meant by the term "mobbing"?

Mobbing is a term which is sometimes used over-hastily without differentiating between a dispute, a case of rivalry or actual mobbing. The term "mobbing" is used to describe repeated, malicious harassment of a person by one or more perpetrators over a period of time, the goal being to cause harm and wear that person down. A power gap is therefore one of the characteristic aspects of mobbing, plus the fact that the victim is unable to put an end to the mobbing without help.

26 What are the different forms of mobbing?

Mobbing takes many forms and may include teasing, taunting, mockery, threats, talking down, insults, embarrassing the other person, slander, exclusion, blackmail, ignoring the other person, retention of information, causing harm to property, physical assault, intimidation and/or sexual harassment. More recently, we have seen the use of information technologies in new forms of mobbing.



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