



# Supplier Code of Conduct

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## Introduction and foreword by the Management

As an ST Engineering Group company with international business relationships, we are committed to honest and ethical conduct in all our business activities. The EFW Group aligns its business activities with the ST Engineering Group Code of Conduct and Ethics in accordance with applicable laws, policies and regulations. The EFW Group has a zero-tolerance policy in relation to unethical business behavior such as corruption, bribery and forced labor.

Our basic rules and principles are also of great importance to our business partners. This Supplier Code of Conduct sets out the essential minimum standards for the EFW Group in relation to our business partners. We expect our suppliers to also align their business activities with the rules of this Code of Conduct and to apply the principles described herein in their business activities as well as along their own supply chain.

In this context, we also expect our suppliers, including their employees, agents and subcontractors, to respect and observe the standards of this Code of Conduct when doing business with or for the EFW Group. It is the responsibility of suppliers to inform and train their employees and their business partners along their own supply chain accordingly.

*Dr. Andreas Sperl*

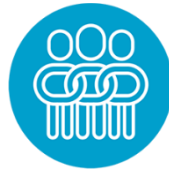
Managing Director  
Elbe Flugzeugwerke GmbH

## Compliance with laws

This Code is based on the values and rules of the ST Engineering Group Code of Conduct and Ethics, the principles of international compliance and ethics standards and country-specific laws and guidelines.

Our suppliers are required to comply with all applicable laws and other regulations of the respective countries in which they do business.

If any provisions of this Code of Conduct conflict with or modify the provisions of any existing contract between EFW and the Supplier, the provisions of the contract with the Supplier shall prevail unless otherwise agreed.



# 1. Responsibility in the workplace

## Human rights

Our suppliers undertake

- to comply with internationally applicable human rights in their business activities in accordance with the United Nations Human Rights Charter.
- to strictly reject any form of forced and child labor as well as other forms of slavery and human trafficking, apply all applicable guidelines, laws and regulations in this regard (e.g. under the UK Modern Slavery Act, International Labor Organization (ILO) Convention) and not profit from either forced or child labor in its business activities and advocate the elimination of forced and child labor.

## Equal opportunities and prohibition of discrimination

Our suppliers ensure in accordance with applicable policies and laws,

- that all employees and applicants are given equal opportunities and that no discrimination against employees, for example on the basis of gender, ethnic origin, age, skin color, marital status, physical or mental disability, religious affiliation or sexual orientation, is tolerated.
- that their employees are provided with a working environment that is free of physical, verbal and psychological violence, sexual harassment or other derogatory or abusive behavior.

## Workers' rights

Our suppliers respect and ensure

- compliance with all laws and regulations applicable to labor relations in the employment of their staff.
- the free exercise of the rights of workers to freedom of assembly, to freedom of association, inter alia, by forming trade unions and workers' representative bodies on a democratic basis within the framework of national regulations and by joining such an association, and the right of workers' representative bodies to bargain collectively without fear of intimidation, penalties or other detriment or disadvantage on the part of workers and their representatives in the exercise of their rights.

## Wages and allowances

Our suppliers are obliged

- to pay employees at least the locally applicable legal minimum wage, to pay overtime in addition and to provide all legally required additional benefits.
- to comply with laws on the restriction of working hours.
- to neither make use of nor promote undeclared work and other illegal employment.

## Occupational health and safety

Our suppliers

- must prevent health and safety risks in the workplace and ensure the best possible precautionary measures for avoiding accidents and occupational diseases are in place.
- provide their employees with necessary and appropriate personal protective equipment.
- provide their employees with necessary safety information about risks in the workplace or hazardous substances and offer training in this regard.
- comply with all applicable regulations and standards concerning the health and safety of their workers in the workplace.



## 2. Conduct in business dealings

### Corruption prevention

Our suppliers undertake

- to implement all necessary measures for preventing corruption and bribery in the course of their business activities in compliance with all anti-corruption laws and regulations of the relevant countries (e.g. UK Bribery Act, US Foreign Corrupt Practices Act - FCPA) in which they do business as well as all international guidelines (e.g. OECD guidelines)..
- not to receive (passive corruption) or grant (active corruption) undue benefits of any kind from members of public authorities and public officials or private business partners that could lead to or give the appearance of undue and improper influence. This also applies to donations and sponsoring measures.
- to prohibit and refrain from any kind of bribe (facilitation payments), even if such payments do not violate applicable local law in the respective country.
- when giving or receiving gifts and hospitality to ensure that they are appropriate, legally permissible and do not violate the rules of the recipient's organization. As a general rule, gifts and hospitality must not create any obligation for the recipient, must not be or appear to be improper influence and must not be construed as a bribe.
- not to use intermediaries or advisors for this purpose when initiating business and, should this be necessary, to exercise particular care with regard to the avoidance of corruption in the drafting and execution of contracts.

### Avoidance of conflicts of interest

Our suppliers are expected

- to avoid any kind of conflict of interest or situations that create the appearance of a potential conflict of interest.
- in the event of an actual or potential conflict of interest to immediately notify all parties concerned. This also includes a conflict between the interests of EFW and the interests of the supplier or his family members, friends or acquaintances or his business partners.

## Fair competition

Our suppliers undertake

- to act in accordance with national and, where applicable, European laws and regulations for fair competition.
- to refrain from any kind of illegal agreement or arrangement that unreasonably restricts competition (for example, agreements on pricing, market sharing, limitation of production).

## Prevention of money laundering

Our suppliers comply with their legal obligations for preventing money laundering and do not engage in money laundering activities.

## Reporting

Our suppliers

- attach importance to transparent, truthful and complete reporting and communication on the business transactions of their companies to investors, employees, customers, business partners, the public in general and government institutions.
- ensure that both internal and external reports, records and other documents belonging to their companies, as well as their retention, are in compliance with applicable legal rules and standards.

## Trade embargoes, export control

Our suppliers must ensure

- that their imports and exports comply with all applicable national and international laws and regulations concerning the import and export of parts, components, technical data and know-how.
- that they provide truthful and accurate information and obtain any export licenses or permits that may be required.

## Counterfeit components

Our suppliers

- develop and operate effective methods and processes suitable for their products to avoid the risk of counterfeit components and materials being integrated in their products to be supplied.

- In justified cases, our suppliers undertake to inform the recipients of counterfeit components and to exclude these components from the delivery item.



## 3. Security of data and information

### Data protection and IT security

Our suppliers undertake

- to collect all personal data in accordance with the applicable data protection regulations and to process and use it in a lawful, transparent and secure manner.
- to avoid data protection breaches or, in the event of a data protection breach, to inform the contact person at EFW as soon as possible.
- to retain data in accordance with the retention periods.
- to protect confidential and proprietary information from unauthorized access, use, disclosure, modification or destruction through appropriate security procedures.
- to take technical and organizational measures to ensure that personal data is processed in accordance with the state of the art.

### Business partner data and intellectual property

Our suppliers undertake

- to treat confidential information pertaining to their business partners in the proper and correct manner.
- not to use information pertaining to their customers and suppliers for purposes (e.g. advertising) other than the business purpose for which it was provided, unless the owner of such information has given permission to do so.
- not to copy, publish or disclose confidential information pertaining to EFW to unauthorized third parties unless EFW has given its prior consent.
- to respect the intellectual property of others and to comply with all intellectual property laws, including patents, copyrights and trademarks.



## Insider information

Our suppliers and their employees are prohibited

- from using documents obtained in the course of their business relations with EFW and/or non-publicly disclosed information, in particular information about Airbus and ST Engineering as listed companies, as the basis for stock exchange transactions or to enable third parties to trade in shares and securities of other companies with such insider information.



## 4. Social responsibility

### Environmental protection

Our suppliers undertake

- to apply all applicable environmental laws and regulations.
- in particular to comply with the European Chemicals Regulation REACH ("*Registration, Evaluation, Authorization and Restriction of Chemicals*") and the European Directive RoHS on the Restriction of certain Hazardous Substances as amended.
- to ensure as a matter of principle, particularly in the development of new products and services as well as in the operation of production facilities, that any negative impacts on the environment and climate arising from these are kept as low as possible. EFW understands this to mean the following in particular:
  - o the reduction of waste;
  - o the economical use of natural raw materials;
  - o the reduction of greenhouse gas emissions;
  - o the reduction of the use of energy from fossil fuels;
  - o as well as achieving climate-neutral solutions.

We expect our suppliers to be certified to the ISO-14001 environmental management standard.

## Responsible procurement of mineral raw materials

Our suppliers undertake

- to comply with the laws and regulations applicable to minerals from conflict areas.
- in particular to comply with the European Conflict Minerals Regulation (EU) 2017/821 (*"Definition of duties for fulfilling due diligence obligations in the supply chain for Union importers of tin, tantalum, tungsten, their ores and gold from conflict and high risk areas"*) which has applied since 1 January 2021.
- to do all that is reasonable to avoid the use of raw materials that originate from conflict areas or high-risk areas, if their procurement could potentially lead to human rights violations, corruption or the financing of armed groups or potentially be associated with similar negative consequences.



## 5. Basic information on the ethics program

### Implementation by our suppliers

In accordance with the size and nature of their business, our suppliers shall establish appropriate management systems to support compliance with laws and regulations and adherence to the rules of conduct described in this Code within the supplier's company and along its own supply chain.

In this context, EFW expects its suppliers to establish their own rules of conduct in writing in order to create a binding basis for ethical and responsible behavior on the part of their employees and business partners. It is the responsibility of suppliers to inform and train their employees and their business partners along their own supply chain about compliance with these standards and to monitor compliance by appropriate means.

### Whistleblower protection

Our suppliers

- shall give their employees the opportunity to express company-related or ethical concerns freely and independently of their function.

- ensure that the identity of whistleblowing employees, as well as concerns raised in the course of any necessary investigations, are kept strictly confidential in accordance with applicable laws, in particular data protection laws.

## Procedure in the event of violations of the Code

In the event of a breach of this Code of Conduct, whether caused by our Supplier, its bodies and employees themselves or by its affiliates (and/or their bodies and employees) or other companies involved in the performance of the contract, our Supplier shall immediately report the breach to its contact person at EFW or to: [compliance@efw.aero](mailto:compliance@efw.aero)

The Supplier shall, upon notification of the breach, provide EFW with all information necessary for an investigation of the incident, cooperate in the investigation and, if necessary, allow EFW or its advisors to conduct an on-site investigation at the Supplier's premises.

In the event of a material breach of the provisions of this Code of Conduct by the Supplier, EFW reserves the right to review the business relationship and to assert contractual rights.

**Contact:**

If you have any questions about this code of conduct, please get in touch with your EFW contact person or write to:

**Compliance Officer**

**E-mail: [compliance@efw.aero](mailto:compliance@efw.aero)**