



SUPPLIER CODE OF CONDUCT

Rev 1.1, August 28, 2024

1. Scope

This policy establishes a Code of Conduct for current and potential AEM Suppliers. AEM Suppliers include vendors, manufacturers, contractors and sub-contractors registered with AEM and those seeking to provide goods, services or personnel (including consultants to AEM or all other parties with whom AEM Suppliers may contract on AEM's behalf).

2. Intent

AEM is committed to conducting its business in an ethical, legal, safe, environmentally and socially responsible manner. AEM, as a supplier to the aircraft industry, is also obligated to flow this commitment down to our Suppliers. AEM needs its Suppliers to share this commitment and, therefore, has established this Supplier Code of Conduct. AEM requires its Suppliers to use reasonable practices, processes and diligence to consistently meet the following requirements.

3. Supplier Code of Conduct

1. Compliance with Laws, Codes and Regulations

AEM Suppliers are obligated to comply with all applicable laws, codes and regulations as set forth in applicable procurement documents and agreements including, but not limited to, proposals, invitations to bid, solicitations and resulting contractual and purchasing agreements.

2. Environmental, Health and Safety Practices

It is the responsibility of the Supplier to ensure that its facilities are designed and safely operated in compliance with applicable law and that they do not present unnecessary risks to the environment or to the public. AEM Suppliers duties are to maintain safe, sanitary and healthy environments for all their employees at all job sites, including;

- Obtaining and maintaining environmental permits.
- Proper handling and disposition of hazardous materials.
- Monitoring, controlling, and responsibly treating discharges generated from operations.
- Conducting appropriate employee safety training and providing adequate safety equipment.
- Maintaining records of safety training and monitoring safety performance.
- Ensuring Suppliers' employees comply with applicable health and safety rules and regulations and perform their duties and work in a manner which will not endanger themselves or others.

3. Ethical Business Practices

AEM and its Suppliers shall strive to conduct their businesses in accordance with the highest standards of ethical behavior. Suppliers are expected to conform to these requirements in each of the following areas:

- Fair Trade Practices
Suppliers may not engage in collusive bidding, price discrimination, anti-competitive or other unfair trade practices.
- Ethical Sourcing
Suppliers shall strive to source goods or services from others that meet, as a minimum, country of origin standards for health and safety, working hours, pay, employment and conditions and environmental protection.



- Relationships and Communications

AEMs' Business Ethics practice is that all transactions are to be conducted fairly, honestly and with integrity, according to the highest ethical standards. Abuse or violation of this ethics practice is considered dishonesty.

Suppliers and their personnel need to avoid even the appearance of unethical or compromising practices in relationships, actions or communications with regard to existing or proposed business relationships with AEM. Suppliers may not encourage or utilize current or former AEM employees to disclose or provide any confidential, proprietary, or other restricted business information obtained while in AEM's service to influence AEM's existing or proposed commercial transactions for the purpose of gaining a commercial advantage or to otherwise damage AEM's interests. AEM will take the necessary measures to detect any such improper business practices and will take appropriate action against current or former employees and Suppliers who violate these restrictions. Suppliers shall be expected to cooperate with AEM investigations and provide reasonable assistance as requested.

- Bribery, Kickbacks and Fraud

No funds, assets or services are permitted to be paid, rendered, loaned or promised for payment or otherwise dispersed by Suppliers of their representatives as bribes, kickbacks or other forms of payments designed to influence or compromise the conduct of AEM or its representatives.

- Gifts, Gratuities and Hospitality

Suppliers and their personnel may not offer or provide AEM or its personnel with gifts, gratuities or hospitality unless it involves nominal value and is in line with customary business practices. Nominal gifts are described as gifts of a general nature having a low value, including such items as logo inscribed pens, caps, shirts and coffee mugs. Customary business practice in terms of hospitality would include the acceptance of reasonable business entertainment and business meals. For the avoidance of any doubt, AEM pays for its employees' business expenses. Suppliers are not required or requested to incur or reimburse business expenses for AEM employees.

- No Forced or Child Labour

Suppliers must not engage in involuntary labor practices – this includes forced, bonded, trafficked, involuntary prison, or underage labor – in their operations and supply chain.

Suppliers must not hire workers that are under 16 years of age.

Suppliers must ensure that workers between the age of 16 through 18 have the benefit of working hours, conditions and other benefits that are appropriate to their age and do not jeopardize their health or safety or compromise their education.

Suppliers do not require workers to pay recruitment fees or costs, deposit funds, or their personal documents with the Supplier as a condition of their employment or pay fees as a form of discipline.

Suppliers shall ensure that labor agencies used by the Supplier do not engage in any of these prohibited practices.

4. Monitoring And Compliance

Suppliers are required to conduct periodic internal reviews and inspections, as reasonably needed, to ensure their compliance with this Supplier Code of Conduct and its applicable requirements. If a Supplier identifies areas of non-compliance, the Supplier is expected to notify AEM's Quality Assurance Department as to its plans to remedy any such non-compliance.

The implementation of this Policy is a shared responsibility between AEM and its Suppliers. Suppliers are to promptly disclose to AEM, on a confidential basis, all current and potential incidents which give rise to the appearance of conflicts of interest and instances of illegal, unethical or fraudulent behavior by any party, including Supplier employees or AEM employees, related to any of AEM's procurement and contract business.



5. Application

This Supplier Code of Conduct is a general statement of AEM's expectations and requirements with respect to its Suppliers. This Policy should not be read in lieu of, but in addition to, any Supplier obligations set forth in a) requests for proposals, invitations to bid or other solicitation documents, or b) agreements by and between AEM and the Supplier. In the event of a conflict between this Policy and any AEM solicitation documents or applicable agreements, the terms of AEM's applicable solicitation documents or agreements shall prevail. The requirements of this policy are not subject to waiver. Neither AEM, its Suppliers, nor their personnel or representatives are authorized to propose or approve conduct inconsistent with this Code of Conduct.