



PROVIDING THE **HIGHEST LEVEL** OF **SERVICE EXCELLENCE** 

**JUNE 2025** 

## SUPPLIER CODE OF CONDUCT

# MESSAGE FROM THE PRESIDENT

"As major player in business aviation, ExecuJet MRO Services conducts its business with integrity, loyalty and honesty in compliance with the laws and the United Nations Global Compact's principles.

The Supplier Code of Conduct (the "Code") defines the ethical standards that our partners, suppliers, service providers and subcontractors undertake to respect in their relationship with the Company.

Each supplier's adherence to this Code reflects its commitment to implement the ethical principles in the areas of working conditions, environment and safety, business ethics, product safety and the protection of assets and information.

Shared commitment is essential to our collective success. "



Graeme Duckworth President ExecuJet MRO Services

30 June 2025

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### CHAPTER 1 LABOUR CONDITIONS AND HUMAN RIGHTS





The Supplier undertakes to conduct its operations and business relation in full compliance with human rights, in particular by promoting fair and ethical practices.

## PREVENTION AND REMEDIATION OF HUMAN RIGHTS VIOLATIONS RISKS

Depending on its risk profile, the Supplier implements appropriate measures to identify and address risks of human rights violation arising from its activities.

#### CHILD LABOUR

In conducting its operations and within its supply chain, the Supplier shall ensure that it does not employ any person under the legal minimum age for admission to employment in the concerned country or the minimum age for admission to employment as defined by the International Labor Organization (ILO), whichever is higher. The Supplier shall ensure that young workers are assigned tasks appropriate to their age and physical, and cognitive abilities, and that specific measures are taken to protect their health and safety.

#### HUMAN TRAFFICKING AND FORCED LABOUR

The Supplier undertakes not to engage in any form of human trafficking or forced or compulsory labour, servitude or slavery, throughout its supply chain and in the conduct of its business. In particular, the Supplier shall ensure that the employment relationship is freely agreed, accepted and carried out with dignity. Depending on the laws of the country in which the work is performed, the terms and conditions of the employment relationship shall be clearly defined, in particular the duration of the contract, remuneration, working conditions, working hours and any benefits provided by law.

#### **EMPLOYMENT OF FOREIGN WORKERS**

If the Supplier intends to employ foreign nationals for its activities, it undertakes to ensure that their employment complies with the rules applicable to foreign residents.

#### **RESPECTFUL OF HUMAN'S RIGHTS WORKING RELATIONSHIPS**

The Supplier shall ensure that its employees are treated with dignity, respect and fairness. It promotes a working environment free from any risk of harassment (moral and/or sexual), abuse (physical and/or moral) and discrimination of any kind (gender, religion, etc.).

#### **DECENT WAGE**

The Supplier shall ensure that its employees receive decent levels of remuneration, at least equal to the minimum wage of the country in which the work is carried out, enabling them to meet their basic needs, in accordance with the recommendations of the United Nations Global Compact.

#### FREEDOM OF ASSOCIATION

The Supplier shall recognize and respect the right to collective bargaining and the right of workers to exercise their freedom of association, including the right to join or not to join any association of their choice within the appropriate national legal framework.

### CHAPTER 2 BUSINESS INTEGRITY AND ETHICS



The Supplier conducts its business with probity, integrity and respect for business ethics.

#### FIGHT AGAINST CORRUPTION AND FRAUD

The Supplier undertakes to comply with the laws, directives and regulations concerning the fight against corruption and influence peddling applicable to the performance of its activities and its obligations under its relationship with Execulet MRO Services. To this end, the Supplier shall implement an anti-corruption system adapted and proportionate to its risk profile in order to prevent, detect and remedy the risks of breaches of probity associated with its activities.

The Supplier shall take the necessary measures to prohibit any form of illegal and fraudulent practices.

The Supplier undertakes to keep complete and reliable accounts. It must keep accounts and financial documents in strict compliance with applicable standards and legislation. Internal financial procedures shall comply with anti-money laundering and business ethics standards.

#### HOSPITALITY

The Supplier undertakes to use gifts, invitations or any other form hospitality ("Hospitality") in a strictly professional context and to apply the necessary criteria of transparency and proportionality. Furthermore, the Supplier undertakes not to use Hospitality in order to obtain an undue advantage of any kind from a Execulet MRO Services employee.

#### **CONFLICTS OF INTEREST**

In the conduct of its activities with Execulet MRO Services, the Supplier shall take care to avoid any situation which might affect the independent and impartial exercise of the professional duties and functions of any Execulet MRO Services employee.

#### **EXPORT CONTROL**

The Supplier shall ensure that its business practices comply with the laws, directives and regulations, economic sanctions and embargoes applicable to export, import and transfer of parts, components, technical data or services.



#### **CONFLICT MINERALS AND SUPPLY**

The Supplier shall ensure the ethical and sustainable sourcing of the products and services it uses. It shall ensure that the minerals used in the products it supplies do not originate from conflict zones.

### **CHAPTER 3** ENVIRONMENT, HEALTH, AND SAFETY



The Supplier shall comply with any directives, laws and regulations relating to the environment, health and safety, substances and chemicals applicable to it in the performance of its activities and its obligations under its relation with Execulet MRO Services.



#### **ENVIRONMENT**

The Supplier shall integrate environmental and climate considerations into its activities and supply chains. As such, the Supplier shall implement an appropriate management system to identify risks, measure performance and make continuous improvements to minimize its negative impacts in this area.

Depending on its risk profile and activities, the management system implemented by the Supplier shall include, in particular, the following requirements:

- · A strategy to reduce greenhouse gas emissions;
- · Conservation of natural resources, such as energy sources, water and raw materials;
- · The reduction, preparation for reuse, recycling and recovery of waste;
- Controlling emissions and discharges linked to its activities;
- · Limiting the use of hazardous substances and products;
- · Establishing emergency plans and appropriate response procedures; and
- · Adopting an eco-design approach to products and packaging.

#### **HEALTH & SAFETY**

As part of its activities, the Supplier shall ensure a safe and healthy working environment for its employees, subcontractors and other stakeholders. To this end, and depending on its risk profile and activities, the Supplier shall implement an appropriate health and safety management system to identify risks, measure performance and make continuous improvements to minimize its negative impact in this area.

#### CHEMICAL SUBSTANCES AND PRODUCTS

The Supplier undertakes to limit the use of chemical substances and products in the life cycle of the products and services delivered to ExecuJet MRO Services. In addition, the Supplier shall provide ExecuJet MRO Services with all up-to-date information on environmental, health and safety issues related to the products and services delivered to ExecuJet MRO Services, in order to enable ExecuJet MRO Services to meet its compliance obligations and to ensure the safe use of the products throughout their life cycle.



#### Execulet MRO Services and the Supplier places safety above all other considerations.

#### SAFETY COMMITMENTS

The Suppliers involved in the design, development, production or support of products and services related to ExecuJet MRO Services aircraft shall ensure that their employees make safety a priority.

In addition to strict compliance with quality requirements for aircraft certification and airworthiness monitoring, the Supplier shall actively support Execulet MRO Services' safety strategy through its organization and processes, as part of a continuous improvement approach.

#### **VIGILANCE AND INFORMATION SHARING**

As part of ExecuJet MRO Services' quality, airworthiness monitoring and continuous safety improvement activities, the Supplier shall support ExecuJet MRO Services' analysis of safety events.

In addition, the Supplier shall:

· Establish voluntary internal safety reporting channels;

 Identify and manage safety risks and report to ExecuJet MRO Services, through the appropriate channels, those, which, according to its own capabilities, could have an uncontrolled impact on safety;
Include safety aspects into account in its internal monitoring program.

#### **POSITIVE SAFETY CULTURE**

The Supplier shall implement the principles of a Just Culture by:

- Creating an atmosphere of trust to encourage safety feedback from its employees through a non-punitive culture in the event of an error;
- Ensuring that feedback is only used only to improve safety, and to turn adverse events into opportunities to learn and improve.

The Supplier shall promote:

- Share information and feedback;
- · Identification of opportunities for improvement, including best practices.

The Supplier shall regularly:

- Raise employee awareness of safety, Just Culture and the importance of voluntary feedback;
- · Inform employees of the voluntary safety reporting channels available to them.



## CHAPTER 5 INFORMATION PROTECTION



The Supplier undertakes to protect ExecuJet MRO Services' property and information.

#### COUNTERFEITING AND INTELLECTUAL PROPERTY

The Supplier shall develop, implement and maintain methods and processes adapted to the products and services supplied to ExecuJet MRO Services and ensure their free use by ExecuJet MRO Services, in particular with regard to the intellectual property rights of third parties (counterfeiting).

The Supplier shall comply with all applicable laws relating to intellectual property rights.

#### CONFIDENTIAL AND PROPRIETARY INFORMATION

The Supplier agrees to adequately protect all sensitive, confidential and proprietary information of others to which it has access in the course of its relation with ExecuJet MRO Services, in accordance with its contractual obligations and applicable laws and regulations. The Supplier shall implement appropriate physical and electronic security measures to prevent unauthorized access, destruction, misuse, alteration or disclosure of such information.

The Supplier shall immediately notify ExecuJet MRO Services of any suspected or actual data breach or security incident.

#### **CYBERSECURITY**

The Supplier undertakes to comply with laws, directives and regulations relating to information processing and the security of information systems, in particular the GDPR, the IA Act, the Data Act, NIS2 and Part-IS. Where applicable, the Supplier undertakes to comply with the legislation on to the protection of national defense secrets and the contractual cybersecurity requirements applicable to its activities in the context of its relationship with ExecuJet MRO Services. To this end, the Supplier may be required to comply with the AirCyber label or any other similar label applicable to its activities.

#### PERSONAL DATA AND ARTIFICIAL INTELLIGENCE

The Supplier is obliged to comply with the obligations regarding to the protection of personal data as defined by the General Data Protection Regulation (GDPR) of 27th April, 2016 and by the amended law of 6th January, 1978 relating to data processing, files and freedoms.

Consequently, the Supplier guarantees the protection, secure collection and appropriate processing of the personal data in its possession. Furthermore, the Supplier guarantees that such data will not be transferred outside the European Union without due care.

The Supplier shall promote the use of artificial intelligence in a responsible and ethical manner and in compliance with fundamental rights.



## CHAPTER 6 ALERT SYSTEM

Execulet MRO Services has implemented an alert procedure to address, in full confidentially and impartially, any situations of non-compliance (breach of integrity, crime or misdemeanor, health and safety at work, human and environmental rights) that may be brought to its attention by its employees and stakeholders.

This unique procedure provides a protective framework for all reports of non-compliant situations.







## THANK YOU

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