

CODE OF CONDUCT SUPPLIER



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DEUTSCHE AIRCRAFT

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Patricia Ferrari
Vice President Supply Chain

Deutsche Aircraft continues its growth as a leading OEM in aviation. Innovation, sustainability and sound business practices are the pillars of our business processes. The procurement organisation aims at the highest standards with regards to labour, human rights, environmental and ethical conduct and ensures its business practices conform to applicable laws and regulations in key business areas. Emphasising our reputation for responsibility, integrity and sustainability, Deutsche Aircraft requires an unwavering commitment to responsible business practices and sustainable development by all of our suppliers and cascading them across the supply chain.

Representing our values and principles, this Supplier Code of Conduct defines Deutsche Aircraft's standards for its business dealings with our suppliers. It thereby applies to all non-Deutsche Aircraft companies that supply goods and/or services to Deutsche Aircraft.

Accordingly, suppliers are expected to implement these principles throughout their own supply chain and to communicate them to any affiliates, subsidiaries and subcontractors involved in business with Deutsche Aircraft.

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PROCUREMENT LEADERSHIP TEAM

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Christian Dracopoulos-Kreidenweis

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COMPLIANCE WITH LAWS

ANTI-CORRUPTION LAWS

Suppliers must perform their obligations and activities in their relationship with Deutsche Aircraft in full compliance with applicable anti-corruption laws and regulations of every State in which they operate.

COMPETITION AND ANTITRUST

Suppliers must not enter any type of anti-competitive arrangements that could restrict or distort competition. Such arrangements include but are not limited to price fixing, colluding, allocating markets or customers, bid rigging or the exchanging of current, recent or future pricing information with competitors.

GIFTS, BRIBES, ILLEGAL PAYMENTS AND BUSINESS COURTESIES

Suppliers must never offer, promise, grant, make or accept any improper payments of money, gifts or other benefits, nor exchange business courtesies to obtain an unfair or improper competitive advantage.

For the purpose of this Supplier Code of Conduct, "gifts" include cash or any type of entertainment, gift cards, product discounts and non-business activities that have a fiscal value.

Suppliers must implement a process to investigate and report any violations to the policy.

FRAUD AND DECEPTION

Suppliers and their personnel must act with integrity in all their dealings and must not act fraudulently, deceive people and companies or make false claims by defrauding, stealing or misappropriating property or information.

CONFLICTS OF INTEREST

Suppliers must avoid all conflicts of interest or situations that might give the appearance of a conflict of interest. Suppliers must disclose any perceived, potential or actual conflict of interest to Deutsche Aircraft as soon as it has been brought to their attention.

IMPORT AND EXPORT CONTROL

Suppliers must ensure that their business practices comply with the applicable laws, directives and regulations that govern the import of parts, components and technical data services.

Suppliers must ensure that their business practices comply with Export Control laws, provide accurate export control classification and obtain export control licenses and authorisations.

TAXES

Suppliers must comply with all applicable tax laws and regulations and must not deliberately engage in or facilitate tax evasion.

PAYMENT PRACTICES

Suppliers must be fair and reasonable in all payment practices by paying undisputed and valid invoices on time and in accordance with contractual terms and applicable laws.

CORPORATE SOCIAL RESPONSIBILITY

HUMAN RIGHTS

CHILD LABOUR

Deutsche Aircraft does not participate in, nor support the use of, child labour and will not tolerate the use of child labour by its suppliers.

For the purposes of this Supplier Code of Conduct, “child labour” means any work that is mentally, physically, socially, spiritually or morally dangerous and harmful to children and/or deprives them of the opportunity to attend school, forces them to leave school prematurely or requires them to attempt to combine school attendance with excessively long and heavy work.

For the purposes of this Supplier Code of Conduct, a “child” is any person under the minimum legal age for employment where the work is performed, and/or the minimum working age defined by the International Labour Organization (ILO), whichever is higher.

MODERN SLAVERY, HUMAN TRAFFICKING AND FORCED LABOUR

Deutsche Aircraft does not participate in, nor support the use of, forced or enslaved labour or human trafficking, nor will it tolerate their use by its suppliers.

For the purposes of this Supplier Code of Conduct, “modern slavery, human trafficking and forced labour” refers to all work being conducted involuntarily and under the menace of any penalty, such as the use of violence, intimidation, manipulated debt, retention of identity papers or threats of denunciation to immigration authorities.

CORPORATE SOCIAL RESPONSIBILITY

EMPLOYMENT PRACTICES

RESPECT AND DIGNITY

Suppliers must treat all their employees fairly, ethically, respectfully and with dignity.

Suppliers must provide their employees with an employment environment that is free of any physical, psychological, sexual and verbal harassment, intimidation, retaliation or other abusive conduct.

DIVERSITY AND INCLUSION

Suppliers must foster a diverse and inclusive work environment which is free of discrimination in hiring, compensation, payment benefits, access to training, promotion, termination or retirement based on race, caste, ethnic or national origin, citizenship status, religion, age, disability, sex, gender identity, marital status, sexual orientation or preference, union membership, political affiliation or any other personal characteristics.

Suppliers must comply with all non-discrimination laws and regulations.

REGULAR EMPLOYMENT

Suppliers must provide prospective employees with clear information regarding their rights, responsibilities, working conditions and wages.

WAGES AND BENEFITS

Suppliers must adequately and in accordance with applicable laws and industry standards pay their employees for work performed.

WORKING HOURS

Suppliers must ensure working hours, resting hours, maximum consecutive days of work and annual leave comply with national laws and/or the International Labour Organization (ILO) standards, whichever affords the greater protection to employees.

FREEDOM OF ASSOCIATION

Suppliers must respect their employees' right to associate freely, join or form (or refrain from joining) trade unions of their own choosing and to communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

MIGRANT WORKERS

Suppliers must ensure that migrant workers are employed in full compliance with the immigration and labour laws of the host country.

For the purposes of this Supplier Code of Conduct, "migrant worker" refers to any person who is to undertake, is undertaking or has been undertaking remunerated activity in a State of which he or she is not a national.

SAFE AND HYGIENIC WORKING CONDITIONS

Suppliers must provide a safe and hygienic working environment and, based on the general level of knowledge regarding health and safety in the relevant industrial sector, take all reasonable measures to minimise or eliminate danger in the workplace that could cause accidents or injuries.

CORPORATE SOCIAL RESPONSIBILITY

ETHICS AND INTEGRITY

RESPONSIBLE SOURCING OF MATERIALS

Suppliers must comply with all applicable laws and regulations regarding direct and indirect sourcing of critical material, conflict materials and chemicals, such as REACH (EC 1907/2006).

For the purposes of this Supplier Code of Conduct, “critical material” and “conflict minerals” include tin, tungsten, tantalum, gold, bauxite, cobalt, titanium, lithium and other rare Earth elements.

Suppliers must conduct due diligence to identify applicable risks, take steps to mitigate such risks and to support efforts to eradicate the use of any conflict minerals that directly or indirectly finance, facilitate or benefit armed groups, child labour, forced labour, human trafficking and any other gross human rights abuses.

MAINTAIN ACCURATE RECORDS

Suppliers must create, store and maintain business records and ensure that they cannot be altered, concealed or misrepresented.

COUNTERFEIT PARTS

Suppliers must implement methods and processes purposed with detecting, reporting and quarantining counterfeit parts and materials from entering and re-entering the supply chain.

Suppliers must immediately notify recipients of counterfeit parts or materials where they are detected or suspected.

DISCLOSURE OF INFORMATION

Suppliers accurately record all information regarding their business activities, labour, health and safety and environmental practices and shall not falsify or misrepresent such information.

PROTECTING SENSITIVE, CONFIDENTIAL AND PROPRIETARY INFORMATION

Suppliers must protect all sensitive, confidential and proprietary information through appropriate physical and electronic security procedures.

PROTECTION OF INTELLECTUAL PROPERTY

Suppliers must respect intellectual property rights and safeguard customer information in compliance with the laws which govern intellectual property rights assertions, including protection against disclosure.

COMMUNITY ENGAGEMENT

Suppliers are encouraged to contribute to the social and economic development of the communities in which they operate.

GOVERNANCE

ENVIRONMENT, HEALTH AND SAFETY

ENVIRONMENTAL MANAGEMENT SYSTEM

Suppliers must comply with applicable environmental standards and are to preserve the principles of sustainability and environmental protection. In doing so, suppliers actively manage environmental risks across their operations, products and supply chain using an appropriate environmental management system, such as ISO14001 or equivalent.

HEALTH AND SAFETY MANAGEMENT SYSTEM

Suppliers must prioritise their employees' occupational health and safety by establishing an appropriate health and safety management system, such as ISO45001 or equivalent.

SUSTAINABLE PRODUCT AND PROCESS DEVELOPMENT

Suppliers must actively support Deutsche Aircraft's sustainability strategy by seeking to develop, manufacture and deliver innovative products and processes that have the lowest possible environmental impact.

GOVERNANCE

PRODUCT SAFETY

AIRWORTHINESS AND SAFETY REGULATIONS

Suppliers must actively support Deutsche Aircraft's commitments to its safety strategy and demonstrate a continued commitment to airworthiness and safety regulations. Accordingly, suppliers must support any safety issue analyses and assist in the investigation of accidents/incidents.

SAFETY ENHANCEMENT

Suppliers must ensure that safety is prioritised and promoted at all levels within their organisations and that personal commitment and a no-compromise approach to product safety is taken by all employees.

Suppliers are obliged to proactively report any and all events which may impact the product safety and/or safety of operations to Deutsche Aircraft.

GOVERNANCE

INVESTIGATIONS AND MANAGEMENT SYSTEMS

DUTY TO COMPLY WITH THE SUPPLIER CODE OF CONDUCT

Suppliers must take all reasonable steps to ensure that violations of this Supplier Code of Conduct are prevented.

Suppliers must investigate suspected violations and fully cooperate with Deutsche Aircraft in any such investigations.

WHISTLEBLOWER PROTECTION

Suppliers provide employees and third parties access to an anonymous complaint mechanism to report workplace grievances, seek advice or to raise legal or ethical concerns confidentially and without fear of retaliation.

Suppliers must act to prevent, detect and correct retaliatory actions.

