Farnborough Airport Limited

Supplier Code of Conduct

Introduction

Farnborough Airport is Europe's leading business aviation airport, the birthplace of British aviation and first business aviation airport to achieve carbon neutrality. It was here, in 1908, the first powered flight took place on UK soil. Farnborough Airport Limited (FAL) has continued to be a leader in aviation and has been one of the most significant contributors to aviation innovation and aeronautical science for over a century.

Today, Farnborough Airport is a place to connect with the world, where award-winning design, unparalleled service and state-of-the-art facilities combine to create Europe's number one business aviation Airport. Our pioneering spirit persists, as we look to continually improve our environmental performance and pave the way for more sustainable air travel.

We take the same innovative approach to how we conduct our business operations. It is an approach that involves the highest standards of ethics and integrity. ***Proud*** of who we are, ***Passionate*** about what we do, ***Ambition*** drives us forward and ***Together*** we are the Farnborough Airport Company.

Our Suppliers

Our Suppliers are more than partners; they are enablers of our purpose. Together, we strive to achieve our collective goals, ensuring every experience is exceptional, and every connection we foster contributes to a thriving aviation ecosystem.

We hold our Suppliers to high standards to ensure performance aligns with our values. Our expectations extend beyond contractual obligations; they encompass the very essence of our reputation.

We expect our Suppliers to treat us with fairness and respect. In return, we foster a reciprocal relationship by emphasising social value through the promotion of ethical and sustainable practices, community engagement, and future sustainable development.

This Supplier Code of Conduct is the method of communicating our requirements and expectations. This extends to all Suppliers and together, we shape the Farnborough Airport experience.

Code Applicability

This Supplier Code of Conduct applies to all Suppliers, vendors, and business partners that provide products or services in connection with any FAL contract or purchase order.

Suppliers are expected to comply with the principles outlined in this Code throughout the duration of their engagement with FAL. Non-compliance may lead to adverse consequences for the Supplier, including the review, suspension, or termination of the business relationship.

FAL reserves the right to audit Suppliers for compliance with this Code. Upon request, Suppliers must be prepared to provide relevant documentation demonstrating adherence to these principles.

FAL further reserves the right to terminate any contract where a material breach of this Code is identified.

The FAL Supplier Code of Conduct is freely available to view and can be downloaded from: www.farnboroughairport.com.

Communicating this Code

Suppliers are expected to assist FAL in enforcing this Supplier Code of Conduct by communicating it to all of its staff, subcontractors or other third parties engaged in the provision of goods or services to FAL.

Integrity and Transparency

Integrity and transparency are paramount in all our business dealings. We expect our Suppliers to share these values and adhere to the following key principles:

- To comply with all applicable laws and regulations.
- To conduct business with the utmost integrity, transparency and ethicality.
- To not use gratification, inducement, or rewards to influence decision making.
- To disclose any potential conflicts of interest.
- To have a similar code of conduct within their own supply chains.

By working together with these principles in mind, we can foster a mutually beneficial and transparent partnership.

Occupational Health, Safety & Security

Health, safety and security is core to our business ethos, whether in the air or on the ground. It is our highest priority. We expect our Suppliers to work and operate in compliance with all applicable health, safety and security laws, regulations and industry standards.

Occupational Health & Safety

We strive to set industry leading standards in relation to Occupational Health and Safety of everyone at the Airport and we're proud of our ISO 45001 Occupational Health and Safety (OHSMS) certification.

We expect our Suppliers to adhere to all Occupational Health and Safety compliance obligations, best practice and industry standards as well as FAL policies and procedures.

We expect our Suppliers to adhere to these key principles:

- To have in place appropriate policies that are designed to promote the Occupational Health, Safety and prevent work-related injuries and illness.
- To provide and maintain a secure and healthy work environment for your employees.
- To have and maintain appropriate personal protective equipment when working at Farnborough Airport.
- To be proactive and report hazards, whether observed by yourself or others when working at the Airport.
- To cultivate and uphold a robust and generative safety culture.

The health and safety of everyone working at Farnborough Airport is non-negotiable and we expect the same standards from our Suppliers.

Security

At Farnborough Airport, safety and security are paramount. Our stringent security measures are essential to maintaining a safe operating environment. We expect our Suppliers to adhere to the following protocols:

- **Screenings**: To access a secure area, Suppliers are required to undergo thorough security screenings to detect and prevent the introduction of dangerous items into secure areas.
- **Security Briefing and Training**: Suppliers must adhere to all site protocols when working or visiting our site and complete FAL provided security training (where applicable). This includes full compliance with airside, landside, and Temporary Critical Part (TCP) procedures, particularly the screening of vehicles, tools, and equipment.
- **Emergency Procedures**: Suppliers should be familiar with and adhere to all emergency procedures, including evacuation routes and assembly points.
- **Control Access**: Suppliers must comply with access control procedures to prevent unauthorised entry, which could pose safety risks or security breaches. No tailgating at vehicle access barriers is allowed.
- **Unauthorised Photography**: Photography is restricted without prior permission to prevent the capture and dissemination of sensitive information or images that could compromise security and safety.
- **Restricted Information**: Suppliers must safeguard sensitive information to ensure that critical operations are not compromised, which could otherwise lead to unsafe situations.
- **Entry Inspections**: Any vehicles entering the site may be subject to inspection to prevent unauthorised items from being brought in.

By following these security protocols, we can ensure a safer working environment for everyone, including our customers, staff, and Suppliers.

Business conduct

Fair Competition

FAL is committed to promoting open, fair, and effective competition in all markets in which we operate. As our partners in this commitment, Suppliers are expected to conduct their business with openness, integrity, and in full compliance with all applicable competition laws.

Suppliers must:

- Avoid participating in anti-competitive agreements, including but not limited to price fixing, bid rigging, or market/customer allocation.
- Refrain from engaging in collusive conduct that could distort or restrict competition.
- Ensure that pricing strategies and market conduct do not involve the abuse of a dominant market position.
- Stay informed about and comply with all relevant competition laws and regulations in every jurisdiction in which they operate.

By upholding these principles, we strengthen ethical business practices, protect consumer interests, and foster a healthy and competitive marketplace.

Compliance with Laws

Suppliers must comply with all applicable laws, regulations, and legal obligations in every jurisdiction where they conduct business in connection with FAL. This includes, but is not limited to, laws governing labour, health and safety, anti-bribery, data protection, environmental practices, and international trade.

It is the responsibility of each Supplier to stay informed of relevant legal requirements and ensure that their operations and those of any subcontractors are always fully compliant.

Right to Work and Employment Compliance

Suppliers must ensure that all individuals engaged in the delivery of goods or services have the legal right to work in the country in which they are employed or engaged. Suppliers shall maintain effective processes to verify and monitor right to work status and comply with all applicable immigration, employment and labour laws.

Suppliers are expected to apply equivalent standards throughout their supply chain, including subcontractors, agency workers and labour providers, and must take reasonable steps to prevent illegal working. Suppliers shall cooperate with FAL in providing evidence of compliance where reasonably requested and promptly notify FAL of any material breach, investigation or enforcement action relating to illegal working.

Anti-Bribery & Corruption

We uphold a strong commitment to conducting business with integrity, transparency, and fairness. We expect our Suppliers to operate under the same principles. Our stance is unequivocal: we maintain zero tolerance to any form of bribery, fraud, corruption, or money laundering.

Suppliers partnering with us must establish and maintain robust compliance procedures in line with all applicable laws and regulations, including the UK Bribery Act 2010 and relevant Anti-Money Laundering (AML) legislation.

Specifically, Suppliers must refrain from:

- Accepting, offering, promising, paying, permitting, or authorising bribes, facilitation payments, kickbacks, or illegal political contributions
- Providing money, goods, services, entertainment, employment, contracts, or other valuable items to gain or maintain an improper advantage
- Engaging in any other unlawful or improper payments or benefits
- Participating in or facilitating money laundering, including concealing, transferring, or legitimising the proceeds of criminal activity
- Failing to report suspicious financial transactions or lacking adequate controls to detect and prevent AML risks.

By adhering to these principles, we foster a clean, ethical, and compliant business environment that protects all parties and upholds our shared reputation.

Avoiding Conflicts of Interest

Suppliers must avoid any situations where personal, familial, financial, or other external interests conflict or could reasonably be perceived to conflict with the interests of FAL. Maintaining objectivity and integrity in all business dealings is critical to preserving trust and transparency.

Suppliers are required to disclose any actual, potential, or perceived conflicts of interest to their designated FAL contact as soon as they arise. Early disclosure ensures that such matters can be appropriately assessed and managed in line with FAL's policies.

Securities Law Compliance

All FAL Suppliers are expected to comply with applicable securities laws and regulations. Suppliers must not engage in insider dealing or use confidential or material non-public information related to FAL or any other company in a way that could breach securities regulations or compromise market integrity.

Tax Compliance and International Trade Regulations

FAL expects all Suppliers to fully comply with their tax obligations in every jurisdiction in which they operate. Under no circumstances should a Supplier facilitate, enable, or participate in the evasion of taxes by any party, including on behalf of FAL.

In addition, Suppliers must adhere to all applicable international trade regulations, including but not limited to export control laws, sanctions, and customs requirements, when delivering goods or services to FAL. It is the Supplier's responsibility to remain informed of, and compliant with, these obligations at all times.

Gifts & Hospitality

FAL values strong, ethical partnerships with its Suppliers. While gestures of goodwill such as gifts or hospitality may be common in business relationships, they can sometimes give rise to perceived or actual conflicts of interest. To preserve transparency and uphold the highest standards of integrity, Suppliers must adhere to the following principles:

- Gifts and Hospitality: Suppliers must not offer any gifts or hospitality to FAL employees, agents, or public officials where the intent or perception could be to influence a business decision or secure improper advantage.
- Facilitation Payments: Any form of facilitation payment is strictly prohibited. Such payments compromise ethical business conduct and are not tolerated under any circumstances.
- Cash or Cash Equivalent Gifts: Suppliers must never offer gifts involving cash or cash equivalents (e.g. vouchers or gift cards).

Suppliers are also expected to immediately disclose any actual or perceived conflict of interest involving FAL, including concerns related to their own operations, subcontractors, or affiliated third parties. This notification should be made directly to the Supplier's principal contact at FAL.

By adhering to these principles, we collectively foster a culture of trust, fairness, and accountability in all our business dealings.

Respecting Human Rights

FAL expects all Suppliers to conduct their operations in a manner that upholds and respects the fundamental human rights of all individuals. This includes a zero-tolerance policy toward forced, involuntary, or child labour, human trafficking, and all forms of modern slavery across their business operations and supply chains.

Suppliers must implement and maintain effective policies, due diligence, and compliance processes to identify and eliminate any practices that violate these principles. FAL reserves the right to review and act upon any evidence of non-compliance.

We are committed to acting ethically and with integrity in all our business dealings and relationships, implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own businesses and in our approach to tackling modern slavery and human trafficking consistent with our disclosure obligations under the Modern Slavery Act 2015. Further information can be found here:
https://www.farnboroughairport.com/legal/modern-slavery

Social Value & Sustainability

Farnborough Airport is a recognised leader in environmental stewardship within the aviation industry. Our mission goes beyond delivering exceptional service, we aim to serve as a global benchmark for airport sustainability.

We are proud to be the first business aviation airport to achieve Level 4+ carbon accreditation under the Airport Carbon Accreditation Scheme. This milestone reflects our commitment, but it is not the end of our journey.

We continue to drive progress through initiatives such as our Air Quality and Odour Scheme, ensuring any operational impact is addressed appropriately where practicable. We are also deeply committed to preserving the diversity of flora and fauna in and around the airport and enhancing biodiversity where feasible whilst supporting the wellbeing of our neighbouring communities.

Minimising environmental impact and cultivating positive, enduring relationships with our stakeholders are fundamental values at Farnborough Airport. Accordingly, we expect our Suppliers to adopt and evidence these principles by demonstrating responsible and sustainable procurement practices across their operations and supply chains.

Suppliers are specifically encouraged to:

- ***Value Diversity:*** Promote diversity and inclusion by working with a diverse range of Suppliers, including small businesses and minority owned enterprises.

- ***Act Ethically***: Ensure all materials and products are sourced responsibly, avoiding partnerships with Suppliers who engage in unethical labour or environmentally harmful practices.

- ***Support Labour Fairness***: Uphold fair labour practices, including providing safe working conditions, fair wages, and respecting workers' rights.

- ***Use Sustainable Materials***: Where practicable, design or provide products and services for longevity, resource and efficiency including reuse, recycling, recovery or products at the end of their life cycle and use sustainable and recyclable materials in products and packaging to reduce a products or services lifecycle impact.

- ***Adopt Environmental Best Practices:*** Implement initiatives to minimise waste, conserve energy and water, and reduce carbon emissions, including digital tracking or monitoring and

ongoing reporting, ideally through certifications or alignment to standards such as ISO 14001 or similar. Demonstrate continual improvement in environmental performance and climate action, and set measurable objectives and targets aligned to these standards or to recognised sustainability frameworks.

- ***Manage Supply Chain Environmental Impacts:*** Identify, assess and influence the environmental and social impacts of your upstream and downstream supply chain, including procurement, manufacturing, logistics, use and end of life management. Provide transparency in relevant metrics and reporting, and ensure environmental requirements are cascaded to your suppliers and subcontractors.

- ***Create Social Value***: Contribute to local communities by offering employment and apprenticeship opportunities and supporting projects that enhance social and environmental wellbeing.

By committing to these practices, Suppliers reinforce our shared goal of delivering social value and sustainability across every level of operation.

Information & Data

Company Information and Assets Use

Suppliers must use FAL's information, assets, equipment, and supplies solely for their intended purposes and in accordance with all applicable policies and procedures. Misuse or unauthorised access is strictly prohibited.

Personal Data Protection

FAL is committed to safeguarding all personal data handled during our business. Suppliers are required to protect any personal data collected, processed, or managed on behalf of FAL, in full compliance with applicable data protection laws and regulations.

Record Keeping and Integrity

Suppliers must maintain accurate, complete, and truthful records including books, accounts, and communications pertaining to the goods and services provided to FAL. Transparency and integrity in documentation are essential to maintaining trust and compliance.

Public Use of FAL Branding

Suppliers are not permitted to use any of FAL's intellectual property, including trademarks, logos, or names, in public statements, marketing, or promotional materials without obtaining prior written authorisation from FAL. This includes video footage or imagery of airports, terminals, or any FAL operated facilities. Unauthorised usage will be regarded as a breach of contractual obligations.

Cyber Security

All Suppliers are required to implement and maintain appropriate cybersecurity measures to protect any data they process, store, or transmit on behalf of FAL. This includes applying suitable technical and organisational controls, ensuring compliance with applicable data protection laws, and maintaining clear

governance over data access and handling. Suppliers must also have incident response capabilities in place to address potential threats.

Whistleblowing and Ethical Reporting

At FAL, adherence to our Supplier Code of Conduct is fundamental to building and maintaining strong, transparent relationships with our Suppliers. We are committed to upholding the highest standards of integrity and safety, and take any reports of misconduct, breaches, or unsafe practices extremely seriously.

We expect our Suppliers to share in this responsibility by reporting, without delay, any behaviour by FAL personnel, fellow Suppliers, or subcontractors that may be unethical, unlawful, or in breach of regulatory obligations.

If a Supplier becomes aware of suspected misconduct, illegal activity, or fraud, they are required to report it immediately to their primary FAL point of contact. Alternatively, concerns can be raised confidentially via our independent whistleblowing hotline: ***0800 047 4037***.

FAL will not tolerate concerns raised maliciously, in bad faith, for personal gain, or with knowledge of their falsity.

Where permitted by local law, we encourage Suppliers to offer their own confidential reporting channels to support a culture of integrity across the supply chain.

Supplier Engagement Notice

We kindly request that Suppliers do not commence any work until an official purchase order has been issued by FAL, unless prior agreement has been made in writing by an authorised FAL representative.

By accepting an order for the supply of goods and/or services, the Supplier is deemed to have acknowledged and accepted FAL's standard terms and conditions.

FAL's standard terms and conditions for goods and services are available on www.farnboroughairport.com.

All invoices must be submitted in strict accordance with the agreed contractual terms.

Please email invoice submissions to: ***fabpurchasing@lightyear.cloud***