



# CODE OF CONDUCT FOR SUPPLIERS OF EME AERO SP. Z O. O.

## INTRODUCTION

**Responsible and lawful conduct, along with a sustainable supply chain, are fundamental elements of our corporate culture and the foundation of our daily operations.**

The Company's policy, based on the principles outlined in the EME Aero Supplier Code of Conduct, fully complies with international ethical, social, and environmental standards as well as applicable legal regulations.

EME Aero requires its Suppliers to adhere to all relevant national and international laws, regulations, and official guidelines (including those issued by the OECD and the UN) applicable to their business operations. The Company works exclusively with Suppliers who uphold the 10 Principles of the UN Global Compact, which cover four key areas: human rights, labor standards, environmental protection, and anti-corruption. EME Aero also expects its Business partners to promote the same values within their own supply chains.

In case of a violation of this Code the Company reserves the right to conduct audits, compliance assessments, and anti-corruption reviews, including the possibility of terminating the agreement. Our partnership with Suppliers is built on trust, accountability, and a shared commitment to operational excellence.

EME Aero reaches purchasing decisions solely on objective criteria, any attempt to influence this process is unacceptable - the same standard applies to Suppliers and their Business partners.

The EME Aero Supplier Code of Conduct represents a shared commitment to creating a transparent, responsible, and sustainable supply chain based on mutual respect, regulatory compliance, and care for people and the environment. This document is binding for all EME Aero Suppliers and applies to all current and future orders, contracts, and business relationships.



## 1. ENVIRONMENT

**EME Aero expects its Suppliers to take an active and responsible approach to environmental and climate protection. The Company requires that Suppliers' environmental statements also cover their sub-suppliers and include information on verification procedures. In addition, Suppliers are encouraged to actively contribute to the advancement and dissemination of environmentally sustainable technologies.**

### Environmental compliance with EU regulations

EME Aero requires its Suppliers to consistently monitor and actively mitigate the environmental impact of their operations. They are expected to maintain national and EU regulations, in particular:

- *Regulation (EC) No. 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency,*
- *Regulation (EU) 2024/590 of the European Parliament and of the Council on substances that deplete the ozone layer,*
- *Directive 2011/65/EU of the European Parliament and of the Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment.*

### Circular economy

Suppliers play a critical role in advancing the principles of the circular economy. They are expected to implement solutions that reduce waste and resource consumption while ensuring that all goods originate from responsible and sustainable sources. Business partners are obliged to actively adopt CE rules, which enable an integrated approach to raw material management and effective reduction of material losses across every stage of the product life cycle.

### Greenhouse gas emissions

Suppliers are required to actively support climate protection measures by striving to increase energy efficiency and using energy from renewable sources (own production or purchase). Transparency is expected also in reporting CO<sub>2</sub> emission and setting reduction targets, preferably aligned with the 1.5°C warming scenario outlined in the *Paris Climate Accords*.

### Responsible management of chemicals

Suppliers are under obligation to maintain full compliance with all applicable laws and regulations regarding restrictions on the production and use of chemicals and materials. They are also mandated to provide, upon request, appropriate evidence of compliance with the above requirements. All technological processes, manufacturing facilities, and materials used must fully comply with the legal requirements applicable in the operating country. Specifically, Suppliers are required to adhere to:

- *The Minamata Convention on the restriction of mercury use,*

- The ban on the production and use of substances covered by *the Stockholm Convention* on Persistent Organic Pollutants (POPs), as well as the ban on the environmentally unsound management of POP-containing waste,
- The ban on the transboundary movement and disposal of hazardous waste in accordance with *the Basel Convention*.

### **Responsible sourcing of raw material and protection of forest areas**

Suppliers cooperating with EME Aero whose products contain raw materials covered by the EU Deforestation Regulation are required to provide documented evidence that these materials do not originate from deforested areas and have not been harvested in ways that cause degradation of forest ecosystems. Vendors must also confirm that their production processes comply with international human rights standards. This obligation will equally apply to other key raw materials that may be incorporated under the regulation in the future.





## 2. SOCIAL RESPONSIBILITY

**EME Aero is strongly committed to respecting human rights and the principles of fair and decent treatment of employees. We expect our Suppliers to foster a culture of respect, equality, and social responsibility - both within their own organizations and throughout their supply chains.**

### **Respect for human rights**

The Company insists that all Suppliers strictly comply with fundamental human rights, in accordance with international standards and local law. In particular, it requires a safe, fair and inclusive work environment that is free from all forms of discrimination, bullying, coercion or exploitation.

Suppliers are also obliged to respect the rights of the local communities in which they operate. This obligation includes:

- avoiding activities that lead to soil degradation, water and air pollution, excessive noise or water consumption that could endanger human health or limit access to drinking water and sanitation equipment,
- preventing unlawful evictions or appropriation of land, forests and water necessary for the maintenance of local communities.

### **Combating slavery and forced labour**

Suppliers are under obligation to conform to the rules defined in *the International Labour Organisation Convention* on the minimum age for employment of children. Any form of exploitation or abuse is unacceptable. EME Aero Suppliers must refrain from and prohibit modern slavery, slave work, forced or compulsory work, human trafficking or comparable forms of exploitation, oppression or humiliation. Vendors shall ensure that their employees perform their work voluntarily and without restrictions on their freedom of movement and termination of employment.

### **Prohibition of discrimination**

Suppliers are required to guarantee equal opportunities and equal treatment of their employees, regardless of their nationality, ethnic origin, social status, gender, health, any disabilities, sexual orientation, political or religious beliefs, and age, unless such differences in treatment are justified by employment requirements.

### **Equal employment and remuneration conditions**

EME Aero demands that Suppliers treat their employees equally in terms of remuneration for work of equal value, regardless of gender. Business partners are obliged to provide their employees with fair remuneration, which cannot be lower than the minimum wage in the respective country and to grant all legally mandated fringe benefits.

## **Freedom of association and collective action by employees**

Suppliers are compelled to respect the right of employees to freedom of association and participation in collective action. They have to accept the possibility of forming and joining trade unions, as well as participating in collective bargaining. Membership in trade union organisations is not permitted to be a basis for unfair treatment or actions detrimental to the employee.

## **Occupational Health & Safety**

Suppliers are obliged to comply with applicable occupational health and safety regulations in accordance with national standards, in order to ensure the protection of the health and lives of employees and contractors in the workplace. Internal EHS procedures should be regularly updated and adapted to the specifics of job roles, the character of assigned responsibilities, and changing working conditions. Employees shall be regularly informed about safe work practices and participate in periodic EHS training sessions. These actions aim not only to meet formal requirements but also to foster a culture based on hazard awareness, risk minimization, responsibility, and continuous improvement of working conditions.

## **Social engagement**

The Company encourages Suppliers to actively participate in initiatives that benefit local communities, support education and healthcare, as well as social and charitable actions. Business relationships should be based on mutual respect, transparency and constructive dialogue, which promotes the development of lasting and responsible partnerships.



### 3. CORPORATE GOVERNANCE

**Suppliers cooperating with EME Aero are under obligation to conduct their business in accordance with applicable law and business ethics. All forms of fraud, corruption, bribery and activities aimed at obtaining unauthorised benefits are prohibited.**

#### **Compliance with the law**

Business partners are required to adhere to all legal standards, rules and regulations in the jurisdictions where they operate or maintain a registered office. The Company expects its Suppliers to maintain full transparency in their operational, financial, and commercial activities. It is also essential to implement effective risk management and internal control mechanisms and to ensure compliance with current industry regulations.

#### **Tackling corruption and antitrust violations**

EME Aero enforces a strict zero-tolerance policy regarding corruption, bribery, and any unethical business practices. All Suppliers are obligated to comply with applicable anti-corruption laws and international standards, including *the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions*.

Suppliers are required to establish and maintain a comprehensive compliance programme addressing applicable regulations on anti-corruption and antitrust violations, which takes into account the specific nature and level of risk of their business activities. Suppliers shall implement clearly defined rules and procedures to prevent corruption and bribery, provide appropriate training for employees, and conduct periodic assessments to ensure the effectiveness of these measures.

Business partners are obliged to conduct their operations in an honest manner, in compliance with the principles of free competition, and to adhere to all applicable antitrust laws.

#### **Prevention of conflicts of interest**

Suppliers are expected to conduct their operations with transparency and impartiality as well as proactively avoiding any situations that may create a conflict of interest. They are not allowed to enter into personal, financial, or professional relationships that could compromise their independence or unduly influence business decisions. Any actual or potential conflicts of interest must be promptly disclosed and resolved in a fair, ethical, and transparent manner.

#### **Anti-money laundering and counter-terrorist financing**

The Company expects all Suppliers to ensure full compliance with all applicable anti-money laundering and counter-terrorist financing laws and regulations. Suppliers must refrain from any direct or indirect involvement in activities that could facilitate, enable, or contribute to such practices.

## Procedures for reporting irregularities

EME Aero obligates Suppliers to establish an internal mechanism for reporting suspicions of illegal activities or misconduct in the work place. The mechanism must guarantee that employees and other stakeholders are allowed to submit reports securely and confidentially. The system should foster transparency, accountability, and strict adherence to applicable ethical standards.



*\* Suppliers, Vendors and Business partners — throughout this document, these terms are used interchangeably and with equal meaning, referring to all business entities that provide EME Aero with goods as well as services.*