



SUPPLIER CODE OF CONDUCT

SEPTEMBER 2023



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## INTRODUCTION

Montana Aerospace AG (“*Montana Aerospace*”) and its subsidiaries (altogether the “*Montana Aerospace Group*”) is a worldwide operating industrial group and leading manufacturer of complex lightweight components and structures for the space industry. Montana Aerospace pursues responsible corporate management, guided by the principles of integrity, honesty, sustainability and transparency.

The Montana Aerospace Group consists of all companies in which Montana Aerospace AG has a direct or indirect shareholding of a minimum of 50% or in which Montana Aerospace exercises control in a different way. This also includes joint ventures where Montana Aerospace has a controlling interest.

Due to its international activities, Montana Aerospace is subject to various social, political and legal obligations they must comply with. Violations of those, in particular violations of the laws or regulations, can cause considerable financial detriment to Montana Aerospace’s business and lasting damage to the Montana Aerospace Group.

As one of the leading market and technology firms, Montana Aerospace pursues a long-term, sustainable, comprehensive growth and value-creation strategy. Montana Aerospace achieves its goals, among other things, due to high personal commitment, strong team spirit, open communication, relentless focus on quality innovation and ultimate customer orientation.

In the same manner, Montana Aerospace sets out the requirements regarding compliance with laws and regulations, corruption and bribery, social and working conditions, and protection of the environment for its suppliers (“*Suppliers*”) and expects to be followed by them.

The goal is to ensure that Suppliers comply with the same standards and that they take the responsibility to implement requirements to undertake necessary due diligence processes with their employees, agents, temporary workers, subcontractors, homeworkers, suppliers and sub-suppliers with whom they work with in the delivery of goods and services to Montana Aerospace.

For that purpose, Montana Aerospace’s Supplier Code of Conduct (“*Code*”) describes Montana Aerospace’s requirements for how its Suppliers shall conduct business.

Therefore, Suppliers are chosen not only based on quality, safety and cost but also based on their responsible business practices and adherence to the principles set out in this Code such as anti-corruption practices, responsible sourcing, human rights due diligence that also include working conditions and respect for human rights, conflict-affected and high-risk areas, environmental practices, safety standards and protection of intellectual property.



## RESPONSIBILITY FOR IMPLEMENTATION

We expect each Supplier to feel responsible for the adherence to this Code. Suppliers are also expected to implement these principles in their supply chain and go beyond legal compliance to advance in social and environmental responsibility and business ethics.

### Board of Directors

**Michael  
Tojner**

**Thomas  
Williams**

**Christian  
Hosp**

**Markus  
Vischer**

**Helmut  
Wieser**

**Silvia  
Buchinger**

### Montana Aerospace Group Management Board

**Michael  
Pistauer**  
(Co-CEO &  
CFO)

**Kai Arndt**  
(Co-CEO)

**Vicky Welvaert**  
(Group HRO)



## 1. COMPLIANCE WITH LAWS AND SOCIAL NORMS

Montana Aerospace is committed to the highest ethical standards and compliance with all applicable laws and regulations of the countries where Montana Aerospace does business and to respect their social norms. It is Montana Aerospace's policy that everyone cooperating with Montana Aerospace strictly complies with all applicable laws and regulations and observes the highest standards of business ethics and good governance.

## 2. HUMAN RIGHTS

Suppliers must comply with human rights norms within their sphere of influence and shall be committed to respecting human rights and observing the United Nations Guiding Principles on Business Ethics and Human Rights. Suppliers shall seek to identify, prevent and mitigate how its companies or companies of their business partners in their supply chain address actual and potential impacts on human rights.

Montana Aerospace fosters an inclusive culture and requires Suppliers similarly value diversity in their supply chain and they stand up also for equal opportunity and equal treatment, irrespective of ethnicity, skin color, gender, disability, family status, religion, ideology, age, faith, nationality, sexual orientation, social background or political conviction.

Suppliers shall also have zero tolerance for violations of human rights on their premises or anywhere in their supply chain. Suppliers must prevent any involvement in all forms of modern slavery, including human trafficking. Any kind of modern slavery, including human trafficking, compulsory /forced labor or work linked with any kind of punishment shall be strictly forbidden. Suppliers must ensure that child labor is not used in the performance of work.

With regard to women's rights, Suppliers shall respect international standards, including the UN Convention on the elimination of all Forms of Discrimination Against Women (CEDAW). Suppliers shall seek to identify and mitigate the differentiated and disproportionate impact of activities on women and gender nonbinary persons.

Suppliers shall also respect the diversity, cultures, values and legal and customary rights and interests of local communities and organizations in their land and livelihoods and their use of natural resources.

## 3. FAIR COMPETITION

Rules to protect fair competition are an essential part of a free market economy. Suppliers of Montana Aerospace shall commit to dealing fairly with their business partners as well as with third parties and



support free and undistorted competition based on compliance with the competition and antitrust laws. The competition shall be strictly on the merit of their products and services.

Any form of agreement with competitors and concerted conduct aiming at or resulting in a restriction or avoidance of competition shall be strictly prohibited.

No confidential information such as prices and sales terms, costs, production capacities, inventories or similar confidential information must be passed on, accepted or exchanged in any competition that permits conclusion about current or future market conditions.

Suppliers and their personnel shall not use any material, or any non-publicly disclosed information obtained during their business relationship with Montana Aerospace as the basis for trading or for enabling others to trade in the stock or securities of any company.

Suppliers are also expected to avoid all conflicts of interest or situations giving the appearance of conflict of interest.

#### 4. ANTI-MONEY LAUNDERING

Montana Aerospace's objective is to maintain business relationships only with business partners whose business activities comply with legal requirements and whose financial resources are of legitimate origin.

According to that, Suppliers shall also duly apply business partner identification procedures and due diligence in their supply chain so that no party tries to conceal illicit financial resources or otherwise make these financial resources legitimate.

Suppliers shall fully comply with all applicable tax laws and regulations in the countries where they operate and be open and transparent with the tax authorities. Under no circumstances shall Suppliers engage in deliberate illegal tax evasion or facilitate such evasion on behalf of others.

#### 5. GLOBAL TRADE AND EXPORT CONTROL

Suppliers must ensure that their business practices comply with export control laws and regulations including the US, EU and any applicable national regulations, including compliance with sanctions and embargoes legislations. Suppliers shall provide truthful and accurate export control classification, information and obtain export control licenses or otherwise authorizations when required and must communicate any declarations where necessary.



## 6. FIGHT AGAINST CORRUPTION, ILLEGAL PAYMENTS AND FRAUD

Montana Aerospace has a zero-tolerance policy towards bribery, fraud, theft and other forms of corruption.

Suppliers shall comply with all anti-corruption laws and regulations applicable to the performance of their obligations and activities in their relationship with Montana Aerospace.

Suppliers and their employees shall not promise, offer, give or accept any improper monetary or other incentive such as bribes, unreasonable business entertaining and gifts.

Suppliers are expected to have an adequate compliance program regarding the anti-corruption risks of their business and to conduct reasonable due diligence to prevent and detect corruption in all business arrangements, including purchasing contracts, partnerships, joint ventures, offset agreements, and the use of third parties such as agents or consultants.

## 7. CORPORATE INFORMATION / SECRECY / DATA PROTECTION

The commercial and technical know-how of Montana Aerospace is crucial for its long-term success. Suppliers must ensure that any Montana Aerospace company data and know-how that is not publicly available is kept strictly confidential and is adequately protected against unauthorized access, destruction, use, modification and disclosure. Suppliers must immediately inform Montana Aerospace in case of any suspected or actual data breach or security incident.

In the event the disclosure of certain confidential information becomes necessary in the course of a business relationship, Suppliers need to ensure that the third party is bound by an appropriate confidentiality agreement before any confidential information is disclosed.

Suppliers must comply with all the applicable laws governing intellectual property rights assertions, including protection against disclosure.

Suppliers shall also comply with privacy and data protection policies and laws. The collected personal data shall be limited to what is strictly necessary to fulfill a lawful or legitimate purpose and shall be removed if it is no longer needed. No personal information shall be shared without consent or an appropriate purpose. Suppliers shall have an internal data protection policy and personal data breach handling procedure/policy.

## 8. EMPLOYMENT



Suppliers shall create an environment, which provides personal and professional prospects for their employees, in which exceptional performance and results can be achieved and are also rewarded. Suppliers shall not support discrimination in hiring, salary, promotion training, advancement opportunities or termination of any worker based on gender, race, national or social origin, caste, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other condition that could give rise to discrimination.

Suppliers shall respect all human rights of their employees and follow standards, irrespective of the applied working arrangement. Every possible way of employment must always be voluntary.

Suppliers shall adhere to the applicable national laws with regard to working hours and support their employees in achieving a healthy work–life balance. The wages, salaries benefits and any overtime compensation shall be in line with the applicable national law and respective employment agreements. Any deduction from wages/salaries for disciplinary purposes is strictly forbidden.

Suppliers shall also respect the right to freedom of association and collective bargaining and strive for long–term, constructive dialogue with the employees' representation.

If migrant workers are employed, Suppliers shall fully respect the immigration and labor laws of the host country.

## 9. HEALTH, SAFETY AND ENVIRONMENT PROTECTION

Suppliers shall take great care to have an ecologically clean living space. Therefore, Suppliers are committed to achieving a safe, healthy, and environmentally friendly workplace, and are dedicated to continuous improvement in providing high–quality Health, Safety and Environmental (HSE) practices for their staff, contractors, customers, visitors, suppliers and the communities in which they live and work.

Suppliers shall create a workplace that protects people from health and safety risks that arise from work activities by striving to eliminate fatalities, work–related injuries, health impairment and limiting exposure to safety hazards. This includes creating a work environment where there is zero tolerance for violence, bullying and harassment.

Suppliers shall also ensure that their activities do not cause any damage or negative impact on the environment.

Suppliers shall also establish a health, safety and environment management system where roles and responsibilities for health, safety and environment are clear and understood and that is supported by adequate policies and procedures to effectively manage environmental performance and protect the





health, safety and welfare of employees, contractors, visitors and others who may be affected by their activities.

## 10. PRODUCT SAFETY AND COUNTERFEIT PARTS

Suppliers shall make available all necessary safety-relevant information for all hazardous substances and will provide it to Montana Aerospace, if necessary. Suppliers shall also prevent that their products and services from being misrepresented as an authorized item in sense of counterfeit parts.

## 11. RESPONSIBLE SOURCING

Montana Aerospace is committed and determined to source all its raw materials from responsible sources whenever possible taking into account social and environmental considerations.

Suppliers shall ensure that the products supplied to Montana Aerospace do not contain metals derived from minerals or their derivatives originating from conflict regions that directly or indirectly finance or benefit armed groups.

Suppliers shall follow the principles of sustainable sourcing. Montana Aerospace may introduce an evaluation system for its Suppliers: all Suppliers shall be asked to fill out questionnaires, in which a substantial part of the questionnaire is related to environmental and social aspects as well as human rights, among other things. Based on the received answers, Montana Aerospace shall evaluate the Suppliers' compliance with its values and principles in these areas.

## 12. REPORT OF MISCONDUCT

Suppliers shall have internal reporting channels to report any activity that might be a violation of the standards, applicable laws or other regulations.

Suppliers of Montana Aerospace Group are free to report any misconduct identified by them and within their supply chain through the following means:

- Report misconduct via the anonymous online reporting tool on the company website: <https://montanaaerospace.integrityline.com/frontpage>
- Report to the Montana Aerospace Group compliance department (compliance@montana-aerospace.com)

All reports received shall be carefully investigated and, upon request, treated confidential by the applicable "Whistleblower Regulation" of Montana Aerospace.



## 13. SUBCONTRACTOR AND SUPPLIER MANAGEMENT

Suppliers shall conduct due diligence on their subcontractors, suppliers, and sub-suppliers to verify compliance with the Code. Suppliers shall therefore assess the risk for potential breaches of the Code in their supply chains, which may include farms and plantations, implement adequate compliance monitoring measures based on this risk assessment. If non-compliance is identified, Suppliers shall take necessary improvement measures or cease business with subcontractors, suppliers and sub-suppliers if no improvements can be achieved.

## 14. MONITORING /RECORD KEEPING

Suppliers shall maintain documentation appropriate to demonstrate adherence to the Code for its operations. Suppliers shall also maintain documentation on the due diligence process in their supply chains, including agricultural production. Suppliers shall provide Montana Aerospace with this documentation and other information demonstrating adherence to this Code upon Montana Aerospace's request.

## 15. SUPPLIER'S DECLARATION OF COMPLIANCE

Every Supplier of Montana Aerospace is required to sign a declaration of compliance to acknowledge and confirm its compliance with the principles and requirements of the newest communicated version of the Code.



**COMPLIANCE DECLARATION**

We, the undersigned hereby confirm that:

1. We have received and taken due note of Montana Aerospace's Supplier Code of Conduct ("**Code**") (version September 2023) and commit ourselves, in addition to our obligations as set out in the supply agreement(s) with Montana Aerospace AG, to fully comply with its principles and requirements and implement the same in our business.
2. We agree that Montana Aerospace AG or a third party appointed by Montana Aerospace AG may carry out periodic, unannounced inspections/audits on our facilities to verify our compliance with the Code, respecting existing agreements with other partners upon our request.
3. We effectively inform about the Code our employees, agents, affiliates, subsidiaries, subcontractors, suppliers and sub-suppliers with whom we work together in the delivery of goods and services to Montana Aerospace AG and conduct due diligence to ensure its implementation.

We also confirm that we have noted that compliance with the Code is an essential element for business relations between Montana Aerospace AG and us.

The Code is governed by the law applicable to the relevant supply agreement(s) with the Supplier and in the absence thereof, by Swiss law.

\_\_\_\_\_  
Supplier Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
Authorized Representative