

# Supplier Code of Conduct

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## LUXAVIATION GROUP

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# Policy

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Controlled | April 2024

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## 1. PURPOSE

The Supplier Code of Conduct is to ensure that values of Luxaviation Group are being followed by the suppliers and all their personnel including but not limited to employees, officers, and directors. The matters covered in the Code are important for the Group and its Suppliers, for their business conduct.

## 2. SCOPE

Suppliers should refer to the Code of Conduct when considering supplying goods or services to Luxaviation Group. Luxaviation Group reserves the right to choose to do business with companies that comply with this Code of Conduct.

Suppliers are expected to self-assess compliance and take action to remedy any shortcomings.

The policy also applies to sub-contractors of the supplier, as well as employees of the supplier regardless of employment status or hierarchy.

This policy applies to all procurement activities regardless of their value.

## 3. CODE OF CONDUCT

### 3.1. *Ethical expectations*

Our procurement is conducted in an environment of integrity, and we are committed to the highest ethical standards, expecting our suppliers to commit to the same. This can be demonstrated by compliance with the following.

#### 3.1.1. *Legal and regulatory compliance*

Suppliers and service providers of Luxaviation Group shall conduct their business operations according to the laws and regulations that are in place in their regions, jurisdictions, or countries. These obligations shall include, but not be limited to the following:

- Strict compliance to anti-corruption laws. Under no circumstances should you make any illegal payments directly or indirectly to any government or corporate officials to illicit the abuse of his/her position to obtain or retain contractual business.
- Conduct your business in full compliance with any anti-trust or fair competition regulation in place
- Conduct your business in full compliance with environmental laws
- Conduct your business in an honest and transparent manner with any agency, or government officials, at all times

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### 3.1.2. *Managing conflict of interest*

You must ensure that any, and all conflicts of interest, whether actual or perceived, are disclosed as soon as possible.

### 3.1.3. *Demonstrate high standards of conduct*

You must ensure that your business behaviour is beyond reproach. You must not engage in fraudulent or corrupt activities, for example, bribery and money laundering. You should not act in a manner which, by association, brings Luxaviation Group into disrepute.

### 3.1.4. *Good business practices*

Your business should be conducted in a way that shows good corporate management. This includes promoting a collaborative relationship between buyer and seller to resolve issues in a timely and respectful manner. This helps contractual disputes and promotes good working relationships.

### 3.1.5. *Data protection and privacy*

A diligent and practical approach must be taken to ensure sensitive information is appropriately managed in line with confidentiality agreements and any policies. Suppliers must comply with data privacy, confidential information, security laws and regulatory requirements, when personal information is collected, stored, processed, transmitted and shared.

Suppliers shall not use or disclose any information belonging to Luxaviation Group, its existing and prospective customers, other suppliers, employees and other third parties, except as required or authorised in writing by Luxaviation Group.

## 3.2. **Social expectations**

We want to do business with suppliers who support the welfare of both their employees and the community in general. You can demonstrate this by implementing, but not solely limited to any of the following.

### 3.2.1. *Managing workplace health & safety*

As well as complying with workplace health & safety laws and regulations, you should also manage and review workplace hazards and provide required training to your employees.

### 3.2.2. *Treating employees fairly*

You must respect every worker's workplace rights, and entitlements, and ensure compliance with all relevant workplace laws and regulations. These include properly remunerating, giving

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them their entitlements, not discriminating unlawfully, and committing to a workplace free of harassment.

### 3.2.3. *Acting against human rights abuses in the supply chain*

You should make all reasonable efforts to ensure that businesses within your supply chain are not engaged in, or complicit with, human rights abuses, such as forced or child labour.

### 3.3. ***Environmental expectations***

We want to procure in a way that protects and advances environmental priorities. We expect our suppliers to share this commitment and encourage initiatives to reduce the environmental impact of activities, notably through the use of green technologies. You can demonstrate this by complying with, but not limited to, any of the following.

#### 3.3.1. *Enhancing environmental sustainability*

We want to look to ways to improve environmental outcomes, such as

- Application of an environmental management system
- Waste minimization and recycling
- Reducing and/or offsetting carbon emissions
- Reducing the use of hazardous and toxic substances, and the correct disposal thereof
- Using solar and other renewable energy where possible

## 4. **GOVERNANCE**

### 4.1. ***Inspection***

Luxaviation Group reserves the right to confirm compliance with these principles and to conduct compliance audits at our suppliers, as well as their suppliers and subcontractors. Our suppliers must provide all information and facilitate access by representatives of Luxaviation Group seeking to verify compliance with the requirements of this Code.

Suppliers must commit to improving or correcting any deficiencies identified.

### 4.2. ***Records and access to information***

Our suppliers are required to maintain proper records to demonstrate compliance with this Supplier Code of Conduct. They must provide our representatives with access to complete, original and accurate records.

### 4.3. ***Breaches of the Code***

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In the event of any violation of this Supplier Code of Conduct by the supplier or any of its suppliers or subcontractors, Luxaviation Group reserves the right to review the business relationship and, at its discretion, possibly terminate it in conformity with applicable law, even if no written contract formalizing the relationship, without prejudice to the other rights of Luxaviation Group or remedies it may seek.

Any concerns should be directed to the Luxaviation Group Procurement Office or the business unit undertaking the procurement process.

Alternatively, concerns can be raised to Luxaviation Group Legal on email address: [legal@luxaviation.com](mailto:legal@luxaviation.com)

Signed & Stamped on behalf of Supplier: \_\_\_\_\_

Name of Supplier: \_\_\_\_\_

Date: \_\_\_\_\_

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