SUPPLIER CODE OF CONDUCT

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INTRODUCTION

Sonaca S.A. and its subsidiaries (hereinafter referred to collectively as “Sonaca”) have a commitment to actively engage all members of its value chain by requiring adherence to this Supplier Code of Conduct (herein the "Supplier Code"). This Supplier Code has been developed in recognition of the ten (10) principles outlined in the United Nations Global Compact. The UN Global Compact's ten principles in the areas of human rights, labour, the environment, and anti-corruption enjoy universal consensus and are derived from the following:

- The Universal Declaration of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention Against Corruption

LEGAL COMPLIANCE

This Supplier Code sets forth the minimum expectations of conduct that Sonaca requires from any third party, including without limitation suppliers, subcontractors, and vendors, with whom it maintains, or has initiated discussions to maintain, a business relationship (hereinafter, “Supplier”).

Supplier, along with its subsidiaries, affiliates, employees, agents, and representatives, is required to adhere to all principles outlined in this Supplier Code, as well as to comply with the laws and regulations applicable in each jurisdiction where Supplier conducts business.

Supplier is also encouraged to disseminate these principles throughout its own supply chain, striving to exceed mere legal compliance in its commitment to social and environmental responsibility as well as business ethics and integrity.

LABOUR

Sonaca expects Supplier to comply, as a minimum, with all applicable local laws and regulations related to labour and employment including, but not limited to, minimum wage, maximum hours of work, rest periods, compensation, freedom of association, right to organize, and collective bargaining.

Furthermore, Sonaca expects Supplier to comply with the following principles:

CHILD LABOUR

Sonaca will not engage in nor support the use of child labour. Supplier is required to guarantee that child labour is not utilized in the execution of work. The term "child" is defined as any

individual who is below the minimum legal age for employment in the specific location where the work is carried out, or the minimum working age established by the International Labour Organization (ILO), whichever is greater. All workers under the age of 18 must be safeguarded from engaging in work that poses potential hazards or could adversely affect their health, including their physical, mental, social, spiritual, or moral development.

FORCED OR COMPULSORY LABOUR

Sonaca will not engage in nor support the use of forced or compulsory labour. Supplier must prevent any involvement in all forms of modern slavery, including human trafficking, forced, bonded or indentured labour. For example, Supplier's employees must be free to leave work or terminate their employment with reasonable notice, and they are not required to surrender any government-issued identification, passports, or work permits as a condition of employment.

FREEDOM OF ASSOCIATION

Supplier is expected to recognize and respect any rights of workers to exercise lawful rights of freedom of association and collective bargaining.

RESPECT AND DIGNITY

Supplier is expected to treat all employees fairly, ethically, respectfully, and with dignity. Supplier is expected to ensure that its employees are afforded an employment environment that is free from harassment, bullying, and intimidation in the workplace, including all forms of sexual, physical, verbal and psychological abusive conduct.

DIVERSITY AND INCLUSION

Sonaca supports diversity and employment equity.

Supplier is encouraged to create a diverse and inclusive work environment in which all employees are treated with dignity, respect, and fairness. This commitment applies regardless of color, religion, gender, age, ethnic or national origin, disability, sexual orientation or preference, marital status, citizenship status, political preference, or any other personal characteristic.

Supplier is expected to ensure equal employment opportunities for all employees and job applicants, free from discrimination. Supplier must adhere to all applicable non-discrimination laws and regulations.

ENVIROMENTAL, HEALTH & SAFETY

Sonaca operates sustainably and adheres to all relevant environmental laws and regulations. We expect Supplier to manage environmental risks proactively throughout its operations, products, and supply chains. At a minimum, Supplier must comply with all applicable environmental laws, regulations, and standards, such as ISO 14001 or its equivalent. Supplier should also implement policies and procedures that effectively manage its environmental performance, incorporating environmental considerations into product design and service delivery while ensuring their competitiveness.

Supplier is required to:

a) Implement suitable policies, standards, procedures, contingency measures, and management systems to ensure that operations are conducted sustainably.

b) Adopt necessary measures to prevent pollution, conserve natural resources, and utilize them efficiently for operational purposes. Additionally, it is important to implement appropriate emergency response plans and procedures.

Sonaca provides a safe workplace to its employees. Sonaca expects that the occupational health and safety of employees is a priority for Supplier throughout all significant aspects of its activities. As a minimum, Supplier must comply with all applicable health and safety laws, regulations, and standards (e.g. ISO45001 or equivalent). Supplier shall take appropriate action, such as policies, standards, procedures, contingency measures, and management systems, aimed at protecting the health, safety and welfare of employees, contractors, visitors and others who may be affected by their activities by striving to eliminate fatalities, work-related injuries, health impairment and limiting exposure to safety hazards, providing a safe and healthy workplace.

Sonaca encourages Supplier to:

a) communicate to its management, employees, and contractors its commitment to improving environment, health and safety, and to provide training on such commitment; and

b) systematically evaluate its environmental, health and safety performance through appropriate audits and report progress.

PRODUCT SAFETY & QUALITY

Sonaca is committed to achieving the highest level of customer satisfaction, which requires a strong commitment to aviation safety. Supplier is expected to comply with all laws and regulations governing product safety and quality, and to deliver products and/or services that conform to such product safety and quality standards. Supplier must take due care to ensure

that its work product meets our quality standards. We expect Supplier to have established quality assurance processes to identify any defects and implement corrective actions. Further, Supplier must report safety issues to Sonaca and support safety analyses and investigations within required timelines, and Supplier should proactively report any events that might affect product safety or operations.

Supplier must actively support the Sonaca Product Safety strategy and ensure airworthiness and compliance with safety regulations. Each employee should commit to product safety, recognizing the importance of their role in protecting passengers and colleagues. The "Safety First" principle should be promoted at all levels.

INFORMATION SAFEGUARDING

Safeguarding sensitive, confidential, and proprietary information

Supplier is required to safeguard all sensitive, confidential, and proprietary information from unauthorized access, destruction, use, modification, and disclosure. This protection should be achieved through robust physical and electronic security measures, which include addressing emerging risks to information systems by implementing effective IT cybersecurity programs. Supplier must promptly inform Sonaca of any suspected or actual data breaches or security incidents as soon as it becomes aware of them. Supplier is also obligated to adhere to all relevant data privacy laws and regulations. Furthermore, Supplier must comply with all applicable laws governing intellectual property rights, including protections against infringement and unauthorized disclosure.

EXPORT CONTROL

Supplier is required to ensure that its business practices adhere to export control laws and regulations, including those of the US, EU, and any relevant national regulations. This encompasses compliance with sanctions and embargo legislation. Supplier must provide truthful and accurate export control classifications and information, and obtain the necessary export control licenses or other authorizations when required. Additionally, Supplier must communicate any declarations as needed.

RESPONSIBLE SOURCING OF MINERALS

Supplier is required to adhere to all relevant laws and regulations concerning both direct and indirect sourcing of critical materials and conflict minerals, particularly when these are integrated into purchased products. These materials encompass "conflict minerals" such as tin, tungsten, tantalum, and gold, as well as rare earth elements and additional minerals or metals including bauxite, cobalt, titanium, and lithium. Supplier must implement a comprehensive policy and management system to ensure that the conflict minerals and

critical materials present in the products it provides are sourced responsibly, minimizing environmental impact and safeguarding human rights. Supplier is required to carry out due diligence and furnish Sonaca with supporting information regarding its sources and supply chain for these minerals upon request. Supplier must also inform Sonaca of any uncertainties related to the origin or production methods. If the material's 'chain of custody' is deemed "indeterminable" or otherwise unknown, Supplier is expected to obtain the necessary certifications or discontinue that mineral source.

COUNTERFEIT PARTS

Supplier is required to establish, implement, and uphold effective methods and processes tailored to its products in order to reduce the risk of counterfeit parts and materials being delivered. Robust procedures should be established to detect, report, and quarantine counterfeit parts and materials, as well as to prevent these items from re-entering the supply chain. In the event that counterfeit parts or materials are identified or suspected, Supplier must promptly notify the recipients of these counterfeit items.

PAYMENT OF TAXES

Supplier is required to adhere to all relevant tax laws and regulations in the countries in which it operates, maintaining openness and transparency with tax authorities. It is imperative that Supplier does not engage in any form of deliberate illegal tax evasion or assist others in such activities.

Supplier must establish robust controls to mitigate the risk of tax evasion or its facilitation. Additionally, Supplier should offer comprehensive training, support, and whistleblowing procedures to ensure that employees fully understand these measures, can implement them effectively, and feel empowered to report any concerns.

PAYMENT PRACTICES

Supplier is expected to be fair and reasonable in its payment practices and pay undisputed and valid invoices on time in accordance with agreed contractual payment terms and applicable laws.

INTEGRITY & BUSINESS ETHICS

ANTI-CORRUPTION

Sonaca promotes integrity and ethics in all aspects of its activities. Supplier is required to adhere to all anti-corruption laws and regulations relevant to its obligations and activities in relation to Sonaca. It is anticipated that Supplier will implement a compliance program specifically designed to address the risks associated with its

business and will conduct thorough due diligence to prevent and identify any instances of corruption.

ILLEGAL PAYMENTS

Supplier is strictly prohibited from offering, promising, making, accepting, or agreeing to accept any improper payments, whether in the form of money or anything of value, to government officials, political parties, candidates for public office, or other individuals. This prohibition extends to so-called 'facilitation' or 'grease' payments that are meant to expedite or secure the performance of routine governmental actions, such as obtaining a visa or customs clearance. Such payments are only permissible if there exists a formal legal government fee schedule for these expedited services and the government issues receipts for them.

Personal safety payments are allowed only when there is an immediate threat to health or safety. Supplier must refrain from offering or accepting any illegal payments from customers, suppliers, or their agents, representatives, or any other parties. We expect Supplier to ensure that its employees do not receive, pay, or promise any monetary sums or valuable items, either directly or indirectly, that are intended to exert undue influence or gain an improper advantage.

COMPETITION AND ANTITRUST

Supplier is prohibited from engaging in any formal or informal anti-competitive arrangements, such as price-fixing, collusion, bid rigging, supply limitations, or market allocation and control. Supplier must refrain from sharing current, recent, or future pricing information with competitors. Additionally, Supplier must avoid participating in cartels or any activities that could unlawfully restrain or adversely affect competition.

CONFLICT OF INTEREST

Supplier must immediately disclose any actual or potential conflict of interest, and discuss it with Sonaca's management. Any activity that is approved, despite the actual or apparent conflict, must be documented. This includes a conflict between Sonaca and personal interests or those of close relatives, friends or associates.

GIFTS AND BUSINESS COURTESIES

Supplier must refrain from using the exchange of business courtesies as a mean to secure an unfair competitive advantage. In any business relationship, it is essential for Supplier to ensure that any gifts or business courtesies offered or received comply with applicable laws and regulations. These exchanges must not contravene the rules and standards of any organization involved in the business relationship and should align with customary practices in the

marketplace. Additionally, cash gifts or cash equivalents must not be offered or accepted.

GOVERNANCE & MANAGEMENT SYSTEMS

Sonaca may verify the compliance of Supplier with this Supplier Code. Such verification will be conducted by way of a Supplier's self-evaluation or an audit by Sonaca (or an external resource designated by Sonaca) who may visit Supplier's facilities with or without notice.

If any ethical or legal compliance issues arise that raise any questions, Supplier has the responsibility to bring them forward to Sonaca's management.

Whenever a situation of non-compliance is identified, Sonaca may work with Supplier to develop and implement a corrective plan to improve the situation. Sonaca will continue to develop monitoring systems to assess and ensure compliance with this Supplier Code.

SPEAK UP CULTURE AND WHISTLEBLOWER PROTECTION

Supplier is required to ensure that employees and third parties have access to appropriate reporting channels for seeking advice or raising legal or ethical concerns, free from the fear of retaliation. This includes providing opportunities for anonymous reporting. Sonaca anticipates that Supplier will proactively implement measures to prevent, detect, and address any retaliatory actions.

CONSEQUENCES FOR VIOLATING THE CODE

If the expectations outlined in this Supplier Code are not fulfilled, Sonaca reserves the right to take any appropriate measure depending on the nature and seriousness of the non-compliance. These measures may include a warning, the proposal of corrective action plans, application of contract remedies, or a revaluation of the business relationship, without prejudice to other legal or administrative action that may be applicable.

SUPPLIER COMMITMENT

Supplier commits to adhering to the principles outlined in this Supplier Code in its entirety and without any kind of reservation.
Supplier is responsible for ensuring that the principles of this Supplier Code are communicated effectively to its employees, affiliates, subsidiaries, and subcontractors who engaged in business that supports Sonaca.

By signing this Supplier Code, Supplier acknowledges that this document represents a commitment to the principles outlined herein, applicable to all existing contracts (if any) and to all business and contractual relationships with Sonaca. Failure to comply with the provisions of the same may have different consequences and may lead to the termination of the business

relationship or the review of its qualification as a supplier of Sonaca.

Supplier Name

_____

Name and title of the authorized representative

_____

Signature

_____

Date

_____