

SUPPLIER CODE OF CONDUCT



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TOGETHER

ACT AS A RESPONSIBLE PARTNER OF OUR STAKEHOLDERS

INTRODUCTION

Daher is an aircraft manufacturer and supplier of aeronautical equipment and industrial and logistics services. Building on the DNA of its family shareholders, the Group has been focused on innovation since its creation in 1863.

As a family-owned Group, sustainability and sustainable development have traditionally been important elements of our practices.

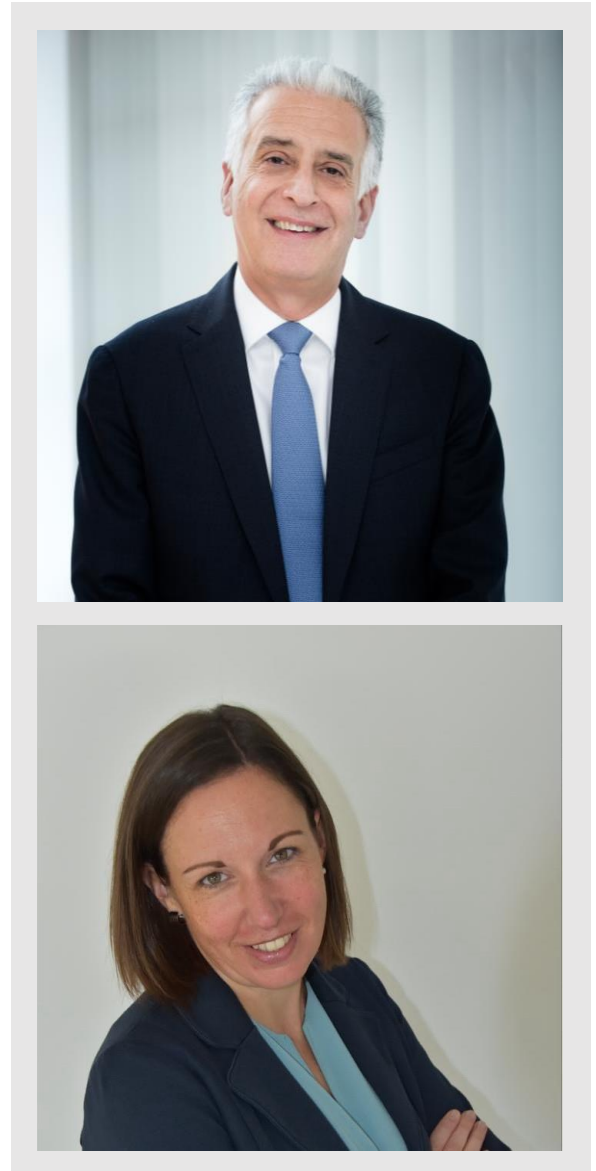
Since 2014, Daher pursued the goals of formalizing and structuring its CSR (corporate social responsibility) strategy – even before being subject to regulatory requirements.

Daher considers a responsible purchasing approach to be an essential pillar of its strategy.

The group's responsible purchasing policy – defined and modeled in 2021 – is the cornerstone of this approach. It is aligned with the Group's values and commitments in meeting sustainable development objectives across the markets in which we are involved.

Daher's responsible purchasing approach has been taken to its highest level, and has been recognized with the French RFAR (in English: Supplier Relations and Responsible Purchasing) labeling across its entire scope of purchasing.

RFAR is the first French label that promotes purchasing approaches with high moral standards. Obtaining this label places us in a process of continuous improvement in which, through the following Code of Conduct, we wish to include our community of suppliers.



Didier Kayat
Daher CEO

Gaëlle Couve
Vice President of
Group Purchasing

THE DAHER GROUP'S COMMITMENTS AND VALUES

The Group's commitment is to deploy its responsible purchasing approach for the following reasons:

- The risk management approach that already is integrated into the group's practices and values will be applied to purchasing. As a result, Daher intends to manage both the CSR risks linked to its activities and those of its suppliers and subcontractors, while also managing the risks linked to supply chain disruptions while securing them;
- Promote supplier commitment through the implementation of lasting, balanced and partnership-based relationships;
- Optimize costs, using a comprehensive cost and logical approach to create economic value throughout the supply chain;
- Maintain our competitive advantage by stimulating the implementation of innovation throughout the supply chain;
- Respect the Group's ethics and values, as well as the national and international laws and regulations applied in our sectors of activity and in each country where the Group is present;
- Develop the company's attractiveness and make it stand out; achieving this with the suppliers to become an essential, leading partner for them; and also internally to attract and retain talent;
- Maintain and strengthen investor confidence.

THROUGH THE COMPANY'S RESPONSIBLE PURCHASING POLICY, DAHER EXPECTS THAT ITS PARTNERS, SUPPLIERS AND SUBCONTRACTORS WILL ALSO PLAY A MAJOR ROLE.

RESPONSIBILITY

Daher is committed to being aware of the economic issues – as well as social and environmental aspects – related to its activities, and to manage them.

ENTREPRENEURSHIP AND THE SENSE OF MOVEMENT

The Group strives to inspire with its entrepreneurial spirit. Daher constantly innovates.

CREATIVITY AND INNOVATION

As a true driver of growth and competitiveness, Daher has been focused on creativity and innovation since its creation in 1863. These values are central to its sustainable development.

RESPECT AND TRUST

These are two founding values of Daher in our relationships. The Group also reviews and improves its development while respecting the human values which constitute its identity.



OUR COMMITMENTS TO RESPONSIBLE PURCHASING



Guarantee the management of health and safety for the employees of our suppliers and subcontractors. ■

Promote human rights in – and through – our purchasing. ■

Ensure a level of social protection and working conditions for the employees of our suppliers and subcontractors. ■

Promote innovation in all aspects of our purchasing. ■

Generate a positive geographical impact through our purchases. ■ ■

Drive transparency in purchasing practices throughout the supply chain. ■ ■

Generalize the cost analysis for the entire life cycle of products and services, beginning at the needs definition stage. ■

Ensure the development of our employees' skills and those of our suppliers, taking into account CSR issues in purchasing. ■

Protect sensitive data and industrial know-how. ■

Reduce the environmental impact of our purchases. ■

Guarantee the fairness of our business practices, as well as the effective prevention of corruption risks. ■

Build lasting and balanced partnership relations with our suppliers. ■



REQUIREMENTS FOR SUPPLIERS AND SUBCONTRACTORS

Compliance with national and international laws and regulations

Suppliers and subcontractors must act in compliance with the laws and regulations across the countries in which they carry out their activity, and go beyond the legislation in force.

Beyond this, suppliers and subcontractors need to commit to the respect of international law and conventions – in particular the conventions of the International Labor Organization.

Within their supply chains, the signatories of Daher's Code of Conduct commit to eliminate all forms of illegal or forced labor – along with all forms of child labor and all forms of hidden work (as provided, in particular, in Articles L8221-6 and those which follow in the Labor Code) – in their activities.

As appropriate, Daher's suppliers and subcontractors will transmit the documents provided in Articles D8222-5, D8222-7 and D8254-1 and those that follow in the Labor Code, upon signature of this Code of Conduct, as well as before any start-up of the service, and every six months.

In particular, they are to provide:

- An extract from the trade and company register, or an entry in an equivalent register;
- Attestations and certificates issued by the competent administrations and organizations confirming that the company has met its tax and social obligations (dated at less than six months).

A declaration of honor indicating that the services will be carried out by employees who are employed in compliance with the Labor Code (Articles L2121-10, L3243-1 and R3243-1).

Suppliers and subcontractors must ensure that their business practices comply with applicable laws and regulations relating to the import and export of supplies, components and technical data.

They must provide, where applicable, sincere and precise information and obtain the necessary licenses and approvals when required.

They also must comply with all legislation, directives and regulations regarding sanctions and embargoes applicable to exports, imports and associated financial transfers.

Respect for human rights and fundamental freedoms

Suppliers and subcontractors must respect the principles set out in the Universal Declaration of Human Rights and the European Convention on Human Rights.

Signatories to Daher's Code of Conduct are to guarantee respect for human dignity, encourage diversity and promote equal opportunities. They commit to the respect of everyone and to accept their skills – whatever their origins, religion, gender or their worth.

The signatories of this Code of Conduct also will undertake to eliminate all forms of discrimination and harassment, whatever their nature.

Suppliers and subcontractors must ensure a framework and working conditions that guarantee the effectiveness of the individual and fundamental freedoms of their employees – such as freedom of association or trade union freedom.

Signatories of this Code of Conduct must condemn all violations of human rights and fundamental freedoms in all countries where they are present, as well as in their spheres of influence.

Decent working conditions

Suppliers and subcontractors must ensure working conditions that guarantee the safety and preservation of their workers' health, regardless of the employment relationship with the company.

The signatories of this Code of Conduct agree to ensure that their activities and the substances utilized do not affect the health and safety of their employees, their suppliers and end users. They also guarantee the existence and dissemination of health, safety and security rules to employees that are specific to their activities. They are to ensure the safety of the sites where they carry out their activities, protecting against risks that could harm the health and safety of their workers.

They also are encouraged to put a management system in place to ensure that the risks linked to their activities are identified and evaluated – and that all measures are taken to control and eliminate such risks.

Suppliers and subcontractors must respect the working hours and remuneration that are in force across the countries in which they carry out their activities, and grant their employees all social benefits in accordance with applicable laws.

They also must pay their employees for overtime in compliance with applicable regulations or, for countries for which these regulations do not exist, pay them at an hourly rate at least equal to that paid for normal working hours.

Salary deductions and reductions as disciplinary sanctions are prohibited.

Signatories to this Code must develop and implement a policy that enables their employees to freely express any legal or ethical concerns without fear of reprisal.

They also agree to undertake the implementation of measures to prevent, detect and punish any retaliatory action.

Suppliers and subcontractors are to comply with regulations and laws relating to conflict minerals (which include tin, tantalum, tungsten and gold).

The signatories of this Code of Conduct guarantee that the products they manufacture do not contain tin, tantalum, tungsten or gold that finances or benefits – directly or indirectly— armed groups perpetrating grave and serious violations of human rights.

They are to ensure a means of due diligence in their supply chains, and are to require a similar mechanism for their own suppliers and subcontractors.

Management of environmental impact

Suppliers and subcontractors undertake to implement all means and measures necessary to reduce the impact of their activities on the environment. As such, they are to respect the laws and regulations in force in the countries in which they carry out their activities.

Where applicable, they are to obtain the authorizations and certifications necessary to carry out their activities.

Signatories to this Code of Conduct must develop and apply a policy aimed at:

- Mitigating the impact of their activities on natural resources and non-renewable resources;
- Controlling and reducing energy consumption;
- Limiting and managing waste throughout the supply chain;
- Reducing nuisances and pollution, whatever their forms;
- Preserving and restoring biodiversity.

They also guarantee that the products and services delivered are compliant with regulations – in particular those in force at the French and European level relating to dangerous substances (REACH, RoHS, asbestos) and waste (WEEE).

They are encouraged, as well, to implement a management system ensuring that the risks linked to their activities are identified and assessed, and that all measures are taken to control and eliminate them.

Supply chain contribution to climate change mitigation and adaptation

Suppliers and subcontractors will take steps to reduce their greenhouse gas (GHG) emissions to be aligned with Daher's commitments and its low carbon strategy.

The signatories of this Code of Conduct undertake to provide an annual statement of GHG emissions, linked in particular to the production and upstream/downstream transportation of goods and services purchased by Daher.

The preparation of this emissions report will make it possible to jointly establish objectives for the annual and multi-annual reduction of emissions.

This report also will constitute a criterion of all supplier selection processes and in the renewal of supplier agreements.

Daher's suppliers are encouraged to implement a similar measurement and reduction strategy with their own suppliers and subcontractors.

Suppliers and subcontractors are encouraged to demonstrate disruptive innovation and develop new products and services contributing to the decarbonization of the supply chain – and the aeronautics and aerospace industry more broadly.

Daher will promote suppliers and subcontractors who offer products and services that are part of its low carbon strategy.

Business ethics

Suppliers and subcontractors must comply with anti-corruption laws and regulations that govern operations in the countries in which they operate.

Daher will not accept undue, direct or indirect advantages from its suppliers or subcontractors. They must refrain from offering gifts, hospitality or entertainment. Only usual acts of courtesy or hospitality, business meals or other events corresponding to the most reasonable practices of the profession are acceptable, as well as gifts other than monetary if their value is low and if such a practice is consistent with accepted usage.

The signatories of this Code of Conduct undertake to fight against any form of corruption, to refrain from making undue offers or payments of money or other valuable gifts, in their name or in the name of Daher, to employees of Daher, to civil servants, political parties, candidates competing in a public election or any other person, and to refrain from promising or soliciting suppliers for illegal payments or other advantages.



This also includes a prohibition on facilitating payments intended to expedite or secure the performance of a routine government action – such as obtaining a visa or customs clearance, even if the action takes place in a location where local law would not be violated. Payments to ensure the safety of individuals are authorized in the event of an imminent threat to their health or safety.

Signatories of this Code of Conduct also undertake not to offer or receive any illegal payment from their customers, suppliers, agents or representatives.

The payment, acceptance or promise of a sum of money or benefit is prohibited for the intention of influencing the behavior of a person, company or organization in performing (or not performing) an act in violation of legal, regulatory and/or professional obligations – which is characterized as an act of corruption.

The signatories also guarantee that they – or their representatives – have not been convicted or are not under investigation for corruption, influence peddling, money laundering or any other criminal offense or violation of business law.

Suppliers and subcontractors are required to exercise reasonable oversight to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, compensation agreements, and the employment of intermediaries such as agents or consultants.

They are also encouraged to adopt the principles described above and apply them to their own suppliers and subcontractors.

Fairness of commercial practices

Suppliers and subcontractors agree not to distort competition or to act unfairly in relation to their competitors and partners. A partial list of targeted elements include:

- Tacit or express agreements between competitors aimed at fixing prices or allocating associated customers or markets;
- Exchanges of confidential or strategic information between competitors;
- Imposition of a resale pricing on distributors;
- Abuse of a dominant position;
- Parasitism (exploiting the efforts and investments of competitors);
- Denigration of competitors;
- The act of hiring away personnel from a competitor in defiance of a non-competition clause.

Suppliers and subcontractors must not seek to obtain advantages of any kind by acting fraudulently, deceiving persons, making false statements, or permitting anyone else to do so. This includes fraud or theft or any type of misappropriation of property of the company, a customer or any third party.

The signatories of this Code of Conduct must formalize and implement a policy aimed at ensuring the achievement of fair competition, identify situations in which there is a real or supposed risk of conflict of interest and – where applicable – inform all affected parties. Conflicts of interest are when an employee's extra-professional activities or personal relationships are likely to interfere with his or her ability to decide and act in the best interests of the company.

Suppliers and subcontractors must develop, disseminate and maintain appropriate methods and processes according to their products to minimize the risk of introducing counterfeit materials or products into the final products. Where applicable, they undertake to inform their customers when the products are not guaranteed, and to exclude them from the delivered product.

Suppliers and subcontractors also are encouraged to adopt practices aimed at ensuring balanced contractual relations in the sector, in particular by:

- Ensuring the best possible visibility for suppliers in terms of their order books;
- Respecting order and delivery commitments;
- Respecting legal and contractual payment deadlines;
- Maintaining a high level of exchanges and dialogue with its suppliers and subcontractors – particularly in times of crisis.
- Promoting the amicable settlement of disputes by encouraging the use of mediation specific to the sector, or by setting up independent mediation within the company.

Data protection and intellectual property

Suppliers and subcontractors must guarantee the protection of sensitive data, confidential data and personal data in the context of their commercial relations with Daher, or in the performance of their services on behalf of Daher, in compliance with laws and regulations in force.

The signatories of this Code of Conduct guarantee a sufficient level of protection against the access to, destruction of, and use or modification and dissemination of the data entrusted to them through all relevant physical and electronic measures.

Therefore, they guarantee the implementation of appropriate measures to combat all forms of cyber malice.

They further guarantee that the data entrusted to them are not used – unless expressly agreed – outside the framework of the business relationship. As a result, they must not use sensitive and confidential information of which they may become aware as part of their business relationship with Daher to ensure financial investments or allow others to do so. They are committed to fighting against insider trading, whatever its form.

Suppliers and subcontractors must act in compliance with the laws and regulations relating to intellectual property rights applicable in the countries in which they operate, including those relating to disclosure, patents, copyright and trademarks.

The signatories of this ethical code undertake to sign and comply with the confidentiality agreements (or Non-Disclosure Agreement/NDA) necessary for the completion of their contract and not to appropriate or use any document or information that may involve intellectual property of third parties without having previously verified their origin and their open availability.

Innovation and partnerships

Suppliers and subcontractors must produce reliable records and not modify any recorded data with the intention of concealing or distorting information. All records – regardless of format – produced or received as evidence of a business transaction must reliably and completely describe the transaction. Records must be retained in accordance with applicable data retention requirements.

In an approach to co-construction of products and processes with reduced impact in mind – particularly environmental impact – Daher is committed to constantly innovating, and the company encourages its partners to do the same. Suppliers and subcontractors therefore must make all necessary efforts to develop and produce technologies, materials, products and processes with the lowest possible impact over the entire life cycle.

To support Daher teams in measuring impacts throughout the life cycle, the signatories of this Code of Conduct undertake to facilitate the overall estimation of global costs for Daher by transmitting all the related data they have at their disposal (or of which they are aware).

SUPPLIER CONTACT POINTS

INTERNAL MEDIATOR

Daher is intent on favoring mediation as a method of handling any disputes that may arise.

This is why, **in the context of a dispute that cannot be resolved** with the appropriate Daher purchasing contact, suppliers and subcontractors are able to **reach the Daher internal mediator** via the following e-mail address:

mediation@daher.com

Daher guarantees the independence and neutrality of its internal mediator.

ALERT MECHANISMS

Alert systems are available to Daher employees and partners in accordance with provisions of the law on the duty of vigilance, as well as the French Sapin 2 law related to the prevention and detection of corruption or influence peddling.

An internal, secure and anonymous alert mechanism is available to Daher employees. The external alert system is available to everyone, via the Daher website (secure, non-anonymous e-mail address).

These various systems make it possible to **report any failure to comply with the principles of this Code of Conduct at Daher or within a supplier or subcontractor.**

The alerting can be exercised in three types of situations:

- Violations of business ethics (corruption, money laundering, etc.);
- Violations of employees' rights (harassment, obstruction offenses, etc.);
- Violations of human rights, fundamental freedoms, the health and safety of people and the environment.

To report or advise of behavior or an act that violates the elements above, utilize the Daher website form: Contact → "You wish to alert us."



TOGETHER

COMMITMENTS

Monitoring method

By signing this Code of Conduct, suppliers and subcontractors of the Daher Group agree to support Daher in the deployment of its responsible purchasing strategy by applying these principles of responsibility in their activities and with their own suppliers.

As part of the partnership and customer/supplier relationship, Daher requests the collaboration of suppliers and subcontractors in responding to surveys, questionnaires and requests – whatever their form and whatever the subject. Daher may provide such elements to comply with regulatory requirements and to deploy the company's policy of responsible purchasing.

Suppliers also agree to be evaluated on the principles of responsible purchasing, as Daher strives to ensure that its suppliers and subcontractors respect them.

To do this – and in close connection with the application of its vigilance duties – the Group uses several systems and tools:

- A mapping of suppliers by intrinsic risks related to the purchasing category or products, to risks linked to the supplier's countries of activity, and to risks linked to the relationship between the Daher Group and the supplier (revenue, volume, dependence...);
- An “export control” team dedicated to guaranteeing compliance with national, European and international regulations related to embargoes and the fight against corruption and influence peddling;
- A digital platform for collecting documents from potential or established suppliers with the goal of fighting corruption and identifying risks (“e-attestation”);
- Purchasing Steering Committees working closely with Risk Committees to report all information and define actions to be implemented;
- On-site supplier evaluations and audits carried out by the Supplier Performance activity of the Purchasing Department.

Daher reserves the right to perform verifications of its suppliers and subcontractors in all areas of this Charter.

The supplier agrees to adhere to the principles set out in the Daher Supplier Code of Conduct. This can be done either by directly following this Code of Conduct or by ensuring that its own standards of conduct and sustainability practices within its supply chain are consistent with the principles set out in this document. The supplier must also take measures to make these principles known to the affiliated entities, subsidiaries and subcontractors that participate in Daher's activities. These principles must be integrated into all business practices.

By signing this Code of Conduct, the supplier commits to respecting the principles set out for all existing contracts and for all commercial and contractual relations with Daher. The Daher Supplier Code of Conduct represents a minimum level of ethical standards and best practices, and is subject to the law applicable to the contract. In the absence of a contract, this document is governed by French law.



SIGNATURE

By the supplier:

With its head office located at:

RCS* of /	
RCS* number /	

Represented by:

With the title/responsibility:

* Registry for the company's accounts and by-laws /
Trade and Companies Register

Hereinafter referred to as: "the Supplier"

The Supplier declares to have read the Code of Conduct and agrees to respect it.

It also undertakes to accept the requested audits and to provide the evidence requested as part of these requirements in the event of a request from Daher.

Date, signature and stamp of the Supplier