

## **BENDER GmbH Maschinenbau und Streckmetallfabrik Supplier Code of Conduct**

The Bender GmbH Supplier Code of Conduct defines the basic requirements placed on Bender GmbH suppliers and third parties. It also represents Bender GmbH' values and principles in line with internationally recognised standards and conventions. Bender GmbH requires commitment to responsible business practices and sustainable development from all its suppliers. Wherever suppliers are located, all business shall be conducted in compliance with this Supplier Code of Conduct. Suppliers are also expected to cascade these principles through their own supply chain and go beyond legal compliance in order to advance in social and environmental responsibility and business ethics. Our joint commitment is a key element in securing our success, conformance to applicable laws and a sustainable future of our industry.

## 1. Compliance with Laws

Suppliers must comply with all laws and regulations applicable to their business, including the local laws and regulations of all countries outside their home country in which operations are managed or services are provided.

## 2. Human Rights

Suppliers are expected to conduct their business and operations in a way that respects human rights by treating their own workers, and those working for their suppliers, with dignity and promoting fair employment practices. This includes providing fair and competitive wages, prohibiting harassment, bullying and discrimination, prohibiting use of child, forced, bonded or indentured labour or prison labour and not engaging in trafficking of persons for any purpose.

Suppliers are expected to identify risks and actual adverse human rights impacts related to their activities and through their business relationships. They should take appropriate steps to reduce risk and ensure their operations do not cause or contribute to human rights abuses and to remedy any adverse impacts directly caused, or contributed to, by their activities or through business relationships.

### 2.1 Child labour

Suppliers must ensure that child labour is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed, and/or the minimum working age defined by the International Labour Organization (ILO), whichever is higher.

All workers under the age of 18 must be protected from performing work that is likely to be hazardous or that may be harmful to their health, physical, mental, social, spiritual, or moral development.

### 2.2 Modern slavery including human trafficking, forced, bonded or indentured labour

Suppliers must prevent any involvement in all forms of modern slavery, including human trafficking, forced, bonded or indentured labour.

All work should be voluntary on the part of the employee.

Suppliers are expected to provide all employees with a written contract in a language they understand clearly indicating their rights and responsibilities with regard to wages, working hours, benefits and other working and employment conditions.

Suppliers should not retain any form of employee identification (passports or work permits), nor destroy or deny access to such documentation, as a condition of employment unless required by applicable law.

Suppliers must not charge employees fees, recruitment costs or deposits, directly or indirectly, as a precondition of work.

Suppliers must respect the right of workers to terminate their employment after reasonable notice and to receive all owed salary.

Suppliers must respect the right of workers to leave the workplace after their shift (see also Wage, Benefit and Working Hours).

### **3. Employment Practices**

#### **3.1 Harassment and bullying**

Suppliers are expected to ensure that their employees are afforded an employment environment that is free from physical, psychological, sexual, and verbal harassment, intimidation or other abusive conduct.

#### **3.2 Diversity and inclusion**

Suppliers are expected to foster a diverse and inclusive work environment where employees are treated with dignity, respect and fairness, regardless of their race, colour, religion, gender, age, ethnic or national origin, disability, sexual orientation or preference, gender identity, marital status, citizenship status, political preference or other personal characteristic.

Suppliers are expected to provide equal employment opportunity to employees and applicants for employment without discrimination and comply with all non-discrimination laws and regulations.

Suppliers must ensure employment, including hiring, payment, benefits, advancement, termination and retirement, based on ability and not any personal characteristics.

#### **3.3 Wages and benefits**

Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime at such a premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate.

Suppliers must not permit deduction from wages as a disciplinary measure nor permit any other deductions which are not provided by national law.

#### **3.4 Working hours**

Suppliers are expected to operate in consideration of the International Labour Organisation (ILO) standards regulating working, resting hours, maximum consecutive days of work and annual leave. Hours worked beyond the normal work week shall be voluntary and suppliers must provide a rest period of at least 24 consecutive hours in every seven days period to all their employees.

### **3.5 Social dialogue and freedom of association**

Suppliers are expected to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. Suppliers are expected to recognize and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing within the appropriate national legal framework.

### **3.6 Disciplinary and grievance mechanism**

Suppliers are expected to have an employee disciplinary process in place to address concerns regarding employee work, conduct or absence. Suppliers are expected to have a grievance mechanism for employees to raise a workplace problem or concern or to appeal a disciplinary decision.

### **3.7 Migrant workers**

The term “migrant worker” refers to a person who is to be engaged, is engaged or has been engaged in a remunerated activity in a State of which he or she is not a national. Suppliers must ensure that migrant workers are employed in full compliance with the immigration and labour laws of the host country.

## **4. Integrity & Business Ethics**

### **4.1 Anti-Corruption Laws**

Suppliers shall comply with all anti-corruption laws and regulations applicable to the performance of its obligations and activities in its relationship with Bender GmbH.

Suppliers are expected to put in place a compliance programme tailored to the 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.

### **4.2 Illegal Payments**

Suppliers must not offer, promise, make, accept or agree to accept any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on so called ‘facilitation’ or ‘grease’ payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, unless there is a formal legal governmental fee schedule for such expediting services and the government provides receipts. Personal safety payments are permitted where there is an imminent threat to health or safety.

Suppliers must not offer any illegal payments to, or agree to receive any illegal payments from, any customer, supplier, their agents, representatives or others. We expect suppliers to prohibit their employees from receiving, paying, and/or promising sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage. This prohibition applies even in locations where such activity may not violate local law.

#### **4.3 Fraud and deception**

Suppliers must not seek to gain an advantage of any kind by acting fraudulently, deceiving people, making false claims or allowing anyone else representing them to do so. This includes defrauding or stealing and any kind of misappropriation of property or information.

#### **4.4 Competition and antitrust**

Suppliers must not enter into formal or informal anti-competitive arrangements that fix prices, collude, rig bids, limit supply or allocate/control markets. They must not exchange current, recent, or future pricing information with competitors. Suppliers must not participate in a cartel or any activity that would unlawfully restrain or impact competition.

#### **4.5 Gifts/business courtesies**

Suppliers are expected to compete on the merits of their products and services. Suppliers must not use the exchange of business courtesies to gain an unfair competitive advantage. In any business relationship, suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by applicable laws and regulations, and that these exchanges do not violate the rules and standards of the recipient's organization, and are consistent with reasonable marketplace customs and practices. No cash gifts or cash equivalent should be offered or accepted.

#### **4.6 Insider trading**

Suppliers and their personnel must not use any material or non-publicly disclosed information obtained in the course of their business relationship with Bender GmbH as the basis for trading or for enabling others to trade in the stock or securities of any company.

#### **4.7 Conflict of interest**

Suppliers are expected to avoid all conflicts of interest or situations giving the appearance of a conflict of interest. Suppliers will provide immediate notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between Bender GmbH and personal interests or those of close relatives, friends or associates.

## **5. Environment, Health & Safety**

### **5.1 Environmental, health & safety management system**

Suppliers are expected to conduct their business in a manner that actively manages environmental risks across their operations, products and supply chain.

Suppliers are expected to establish an appropriate environment management system (e.g. ISO14001 or equivalent), including policies and procedures aimed at effectively managing their environmental performance, including integrating environmental considerations into their product design or service.

Suppliers are expected to establish an appropriate health and safety management system (e.g. ISO45001 or equivalent) including policies 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.

Suppliers should take reasonable steps to provide a hygienic working environment and must ensure that employee's performance and safety is not impaired by alcohol, controlled substances, legal and illegal drugs.

### **5.2 Substances and chemical management**

Suppliers are expected to communicate to Bender GmbH up to date information in regards to environmental, health and safety (EHS) matters of their products to enable safe usage of the products in the whole life cycle. Suppliers are further expected to cooperate with Bender GmbH to enable downstream requirements in relation to suppliers' products and/or services to be fulfilled.

In addition, suppliers are expected to anticipate future regulatory constraints on some chemicals/substances in order to ensure continuity of supply.

### **5.3 Sustainable product and process development**

Bender GmbH suppliers shall actively support the sustainability strategy of Bender GmbH and make their best effort to develop, manufacture and deliver innovative products and processes that have the lowest possible environmental impact throughout the lifecycle.

Suppliers are expected to reduce their climate change impact, improve their efficiency of usage of energy, water and natural resource, minimise waste and use of hazardous materials, dispatch goods in an adequate outer packaging and foster reusable / recycled packaging materials such as reduced usage of single used plastic and responsibly manage their air emissions.

## **6. Product Safety**

Suppliers are expected, by their own organization and processes, to actively support the Bender GmbH Product Safety strategy and contribute to the continued airworthiness and safety regulations.

### **6.1 Safety engagement**

Suppliers are expected to ensure that each of their employees is fully engaged and never forgets that lives of passengers, airlines personnel and fellow employees depend on their personal commitment for product safety.

### **6.2 Safety first**

Suppliers are expected to ensure that the "Safety First" principle is fulfilled and promoted at all levels within their organisations and that each of their employees does his/her utmost to ensure that product safety is never compromised.

### **6.3 Alertness and sharing in the regulatory framework**

Suppliers shall maintain continued airworthiness and safety and shall dully report potential safety issues to Bender GmbH as per applicable regulation.

- Suppliers are expected to support Safety issue analysis in an acceptable time frame.
- Suppliers shall support accident/incident investigation as per applicable regulations.

### **6.4 Safety enhancement**

As per Safety Management System principles, Suppliers are expected to proactively report to Bender GmbH, based on their own Engineering judgement, all events which may potentially impact the product safety and/or the safety of the product operations.

## **7. Information Protection**

### **7.1 Protecting sensitive, confidential and proprietary information**

Suppliers are expected to ensure that all sensitive, confidential and proprietary information is appropriately protected.

In its relationship with Bender GmbH, Suppliers must comply with all applicable data privacy laws and regulations.

Suppliers must protect the sensitive, confidential and proprietary information of others, including personal data/information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures, including mitigating emerging risk to information systems by implementing appropriate IT cyber security programmes.

Suppliers must report to Bender GmbH any suspected or actual data breach or security incident as soon they are aware.

### **7.2 Intellectual property**

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

## **8. Global trade and export control**

### **8.1 Import**

Suppliers must ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import of parts, components, technical data and services.

### **8.2 Export control**

Suppliers must ensure that their business practices are in compliance 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 licences or otherwise authorisations when required and must communicate any declarations where necessary.

### **8.3 Responsible sourcing of minerals**

Suppliers must comply with applicable laws and regulations regarding direct and indirect sourcing of critical material and conflict minerals (i.e. when integrated in purchased products). Those materials include “Conflict minerals” (tin, tungsten, tantalum and gold), rare earth elements, as well as other minerals or metals (e.g. bauxite, cobalt, titanium, lithium). Suppliers shall establish a policy and a management system to reasonably assure that the “conflict minerals” as well as critical material, which may be contained in the products they deliver are sourced responsibly (i.e. with limited environmental impacts and not detrimental to Human Rights).

Suppliers shall support efforts to eradicate the use of any conflict minerals which directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. Suppliers are expected to conduct due diligence and provide Bender GmbH with supporting data on their sources and supply chain of custody for these minerals when requested, and to identify to GmbH any potential doubt on the origin and/or on the production means.

In the event that the material ‘chain of custody’ supplied is “indeterminable” or otherwise unknown, the supplier is expected to either attain the appropriate certifications, or phase out that source of mineral.



#### **8.4 Counterfeit parts**

Suppliers are expected to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of counterfeit parts and materials being delivered. Effective processes should be in place to detect, report and quarantine counterfeit parts and materials and to prevent such parts re-entering the supply chain.

If counterfeit parts and/or materials are detected or suspected, suppliers should provide immediate notification to the recipients of such counterfeit parts and/or materials.

#### **8.5 Payment of taxes**

Suppliers must ensure they 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 should suppliers engage in deliberate illegal tax evasion or facilitate such evasion on behalf of others.

As such, suppliers must put in place effective controls to minimise the risk of tax evasion or its facilitation, and provide appropriate training, support and whistleblowing procedures to ensure their employees understand and implement them effectively and can report any concerns.

#### **8.6 Payment practices**

Suppliers are expected to be fair and reasonable in their payment practices and pay undisputed and valid invoices on time in accordance with agreed contractual payment terms and applicable laws.

### **9. Maintenance Accurate Records**

Suppliers are expected to create, store and maintain business records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it.

Suppliers are expected to have in place appropriate related controls to ensure the above activities are accurately and securely performed. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.

## **10. Governance & Management Systems**

### **10.1 Speak up culture and whistleblower protection**

Suppliers are expected to provide employees and third parties with access to adequate reporting channels to seek advice or raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting.

We expect suppliers to take action to prevent, detect and correct retaliatory actions.

### **10.2 Consequences for violating the code**

In the event that the expectations of this Code are not met, the business relationship may be reviewed and corrective action pursued subject to the terms of the related procurement contract(s).

### **About IFBEC**

*The International Forum on Business Ethical Conduct (IFBEC) was created by member companies of the Aerospace Industries Association of America (AIA) and the Aerospace and Defence Industries Association of Europe (ASD). It provides an opportunity to exchange information on best practices in the area of ethical business practices and global trends among industry participants. IFBEC members have developed a set of Global Principles of Business Ethics for the Aerospace and Defence Industry, which were endorsed by AIA and ASD. The Forum is open to all companies willing to share business practices for sustainable competitiveness.*

*The purpose of IFBEC is to promote and foster through the Global Principles the development of global, industry-wide ethical standards for companies that are active in the aerospace or defence business sectors. The IFBEC is also focussed on organising opportunities for industry and relevant stakeholders to exchange information and best practices concerning ethical business challenges, practices and opportunities worldwide.*

*Global Principles affirm the aerospace and defence industries' commitment to ethical business behaviour and a uniform set of standards. The Global Principles address business conduct as it relates to zero tolerance of corruption, use of advisors, management of conflicts of interest and respect for proprietary information.*

*Companies that formally adhere to the principles commit to including programmes and policies that foster ethical business conduct consistent with the Global Principles in their corporate business practices.*