



Wingsrom Flying Quality Products Code of Conduct

August 2024

Message from our Chief Executive Officer

Wingsrom Flying Quality Products is a leading provider of precision machining solutions for the aviation industry. We are committed to delivering the highest quality products and services that meet the stringent requirements of the aerospace sector.

Our dedication to excellence is rooted in our unwavering commitment to ethical business practices. We believe that integrity, transparency, and compliance are essential to our success and our relationships with our customers and suppliers.

We expect all our suppliers to share our commitment to ethical conduct and to adhere to all applicable laws and regulations. By working together, we can create a sustainable and responsible supply chain that benefits our businesses and communities.

At Wingsrom, we strive to operate safely, act with integrity, and deliver excellence in everything we do. We invite you to join us on this journey and become a valued partner in our mission to shape the future of aviation.

Thank you

Ronen Navick
Chief Executive Officer

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1. Introduction:

We, at Wingsrom Flying Quality Products, are a leader in precision machining, setting high standards for the way we do business. This Global Supplier Code of Conduct (the Code) outlines the minimum standards of behaviour and practices we require from our valued suppliers to ensure the seamless integration into our industry-leading machining processes.

1.1 Purpose:

The Code specifies the minimum standards of behaviour that Wingsrom Flying Quality Products requires of our suppliers. These requirements are based on our commitment to excellence in precision machining, as outlined in our Code of Conduct, and are mandated through our General Conditions of Purchase.

1.2 Content, Scope, and Applicability:

The Code is applicable to all suppliers and partners who provide products or services related to Wingsrom Flying Quality Products contracts or purchase orders, particularly those related to the high-precision machining industry.

2. Operate Safely

All suppliers must make proper provision for the health, safety and welfare of their employees, contractors, visitors, and those in the community who may be affected by their operations. We expect suppliers to comply with legal and industry requirements and seek to implement best practice in their industries.

2.1 Health, safety, and environment (HSE)

| Our principles: | What this means for our suppliers: |
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| <p>Operating safely is a priority for Wingsrom Flying Quality Products. Our vision is to create a working environment with zero incidents, injuries, work-related ill-health, or incidents.</p> <p>Our HS&E goals are to:</p> <ul style="list-style-type: none"> • Create a safe and healthy work environment with no injuries, no work-related ill-health, and no environmental incidents, and • Prevent or minimize the negative impacts of our products and services | <p>We expect our suppliers to take personal and collective responsibility to help fulfil our HSE goals.</p> <p>Suppliers are expected to be committed to managing HSE risks and to proactively protecting the health, safety and the welfare of their employees, contractors, visitors and those in the community who may be affected by their activities.</p> <p>Suppliers must also adopt procedures and practices to minimize any negative impacts on the environment.</p> |

2.2 Responsible sourcing

| Our principles: | What this means for our suppliers: |
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| <p>Wingsrom Flying Quality Products is committed to the responsible sourcing of materials.</p> | <p>Suppliers must provide Wingsrom Flying Quality Products with products made from materials, including constituent minerals, that are sourced responsibly and verified as 'conflict free'.</p> <p>Suppliers must provide Wingsrom Flying Quality Products with supporting data on their supply chain of minerals when requested. If the material 'chain of custody' supplied is "indeterminable" or otherwise unknown, the supplier must commit to either attaining the appropriate certifications, or to the phase out of that material.</p> |

3. Trusted to deliver excellence

At Wingsrom Flying Quality, we believe in building strong, lasting relationships based on trust and mutual respect. We treat all our customers, suppliers, and partners with fairness and honesty. We expect the same high ethical standards from our suppliers and partners, ensuring that our collaborations are built on shared values and integrity.

3.1 Working with customers, suppliers, partners, and communities

| Our principles: | What this means for our suppliers: |
|--|---|
| <p>At Wingsrom Flying Quality, we are committed to conducting business with integrity and fairness. We compete fairly and ethically in sales campaigns and bids for external research funding.</p> <p>When seeking new suppliers and partners, we conduct thorough due diligence to ensure that their values and business practices align with our high ethical standards. We prioritize partnerships with those who share our commitment to quality, innovation, and sustainability.</p> <p>We believe in giving back to the communities where we operate. We support initiatives in education, skills development, environmental protection, social investment, and arts and culture. Our support can include financial contributions, time commitments, or in-kind resources.</p> | <p>At Wingsrom Flying Quality, we expect our suppliers to adhere to the same high ethical standards that we uphold. This includes ensuring that all employees, agents, intermediaries, consultants, representatives, distributors, teaming partners, contractors, suppliers, consortia, and joint venture partners involved in our relationships meet our shared standards of reputation and conduct.</p> <p>We also encourage our suppliers to be attentive to the needs and concerns of the communities where they operate. By actively listening to requests and addressing them appropriately, suppliers can contribute positively to local development and build stronger relationships with their stakeholders.</p> |

3.2 Conflicts of interest

| Our principles: | What this means for our suppliers: |
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| <p>At Wingsrom Flying Quality, we are committed to avoiding any situation where conflicts of interest could compromise our business decisions or behaviour. We strive to always act in the best interests of our company and our stakeholders. If we believe there is, or might be, a conflict of interest, we take immediate action to address it.</p> | <p>At Wingsrom Flying Quality, we expect our suppliers to conduct their business free from conflicts of interest. If any conflicts arise, we require suppliers to take appropriate steps to mitigate them and ensure that their business decisions remain unbiased and in the best interests of our partnership.</p> |

3.3 Accurate business records

| Our principles: | What this means for our suppliers: |
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| At Wingsrom Flying Quality, we maintain accurate and complete records of all our business transactions. This ensures transparency, accountability, and compliance with relevant regulations. | At Wingsrom Flying Quality, we require our suppliers to maintain accurate and complete records of their business transactions. This ensures transparency, accountability, and compliance with relevant regulations. |

3.4 Modern slavery and human rights

| Our principles: | What this means for our suppliers: |
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| At Wingsrom Flying Quality, we have a strict zero-tolerance policy for child labor and any practices that exploit or harm children. We are committed to protecting the rights and well-being of all individuals, especially the most vulnerable members of society. | At Wingsrom Flying Quality, we require our suppliers to adhere to the highest ethical standards and avoid any practices that exploit or harm children. Suppliers must never use or support practices that inhibit the development of children. Additionally, suppliers must not employ anyone under the age of 16 years or, where local laws require a higher age, the mandatory national school leaving age. |
| At Wingsrom Flying Quality, we believe in the fundamental right of all individuals to freely choose their employment. We are committed to fostering a workplace environment where employees are treated with dignity and respect, and where their employment is voluntary and based on mutual consent. | At Wingsrom Flying Quality, we strictly prohibit the use of any form of involuntary labor, including forced, prison, or debt-bonded labor. We require our suppliers to adhere to the highest ethical standards and ensure that all employment relationships are based on voluntary consent and fair treatment. |

3.5 Fair pay and benefits

| Our principles: | What this means for our suppliers: |
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| At Wingsrom Flying Quality, we believe in rewarding our employees fairly based on their skills, contributions, and performance. We strive to create a compensation and benefits package that recognizes and values the hard work and dedication of our team. | At Wingsrom Flying Quality, we require our suppliers to ensure that all wages meet or exceed local minimum wage requirements. Overtime work must be voluntary, and employees must receive adequate compensation for any overtime hours worked. Standard working hours must not exceed legal limits, and overtime hours must not exceed the maximum allowed by law. |

3.6 Diversity and inclusion

| Our principles: | What this means for our suppliers: |
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| At Wingsrom Flying Quality, we foster a culture of open communication, honesty, and respect. We treat each other with courtesy and professionalism, valuing diversity and creating a welcoming environment for all. | At Wingsrom Flying Quality, we expect our suppliers to share our commitment to promoting equal opportunities for all and valuing diversity. We believe that a diverse and inclusive workplace is essential for innovation and success. |
| At Wingsrom Flying Quality, we have a zero-tolerance policy for bullying, harassment, and unlawful discrimination of any kind. We are committed to creating a safe and inclusive workplace where everyone feels respected and valued. | At Wingsrom Flying Quality, we have a zero-tolerance policy for harassment or discrimination towards employees, including all forms of physical, verbal, or psychological abuse. We are committed to creating a safe and inclusive workplace where everyone feels respected and valued. |

3.7 Collective bargaining

| Our principles: | What this means for our suppliers: |
|---|---|
| At Wingsrom Flying Quality, we respect the individual right of our employees to join or not join a trade union. We believe that employees should be free to make this decision without fear of retaliation or discrimination. | At Wingsrom Flying Quality, we expect our suppliers to respect the individual right of their employees to join or not join a trade union. Suppliers must also comply with relevant processes and laws regarding collective representation and consultation, where applicable. |

4. Act with integrity

At Wingsrom Flying Quality, we believe that high ethical standards and compliance with laws and regulations are essential for protecting the reputation and long-term success of our business and our industry. We expect our suppliers to behave ethically, comply with all applicable legal and industry requirements, and strive to implement best practices in their operations.

4.1 Anti-bribery and corruption

| Our principles: | What this means for our suppliers: |
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| <p>At Wingsrom Flying Quality, we have a strict zero-tolerance policy for bribery and corruption in any form. We never offer, give, or accept anything of value that could be seen as improperly influencing business decisions. We are committed to conducting our business with the highest ethical standards and integrity.</p> | <p>At Wingsrom Flying Quality, we require our suppliers to conduct their business honestly, fairly, and free from any bribery or corruption. Suppliers must only offer gifts or hospitality in an open and transparent manner, and these gifts or hospitality must never be illegal or intended to improperly influence business decisions. Additionally, suppliers must not offer or make facilitation payments.</p> |

4.2 Safeguarding our resources and respecting the confidential information of others

| Our principles: | What this means for our suppliers: |
|---|---|
| <p>At Wingsrom Flying Quality, our technologies, intellectual property, and commercially sensitive and confidential information are critical assets of our business. We are committed to protecting these assets from unauthorized access, use, and disclosure.</p> <p>We safeguard the confidential information we hold, including data from customers, suppliers, joint ventures, and other parties. We only share and use this information internally to the extent that we are permitted to and never disclose it externally without authorization.</p> <p>We strictly adhere to ethical business practices and avoid any attempts to obtain or use confidential or restricted information from other companies, including competitors.</p> | <p>At Wingsrom Flying Quality, we require our suppliers to safeguard our resources and information and ensure that all data and documents are kept secure. Suppliers must maintain the confidentiality of all information shared with them and never use information that they are not authorized to have. Additionally, suppliers must not offer or supply information that Wingsrom Flying Quality should not have. To protect our confidential and proprietary information, suppliers must use appropriate non-disclosure or confidentiality agreements.</p> |

4.3 Export controls and import obligations

| Our principles: | What this means for our suppliers: |
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| <p>At Wingsrom Flying Quality, we are committed to full compliance with all import and export laws, regulations, and procedures that apply to our global operations. We prioritize adherence to these regulations and ensure that our business practices align with international trade standards.</p> | <p>At Wingsrom Flying Quality, we require our suppliers to fully comply with all relevant export control legislations when exporting goods or technology. Suppliers must plan for and obtain all necessary authorizations and permits to ensure timely and compliant delivery of their products.</p> <p>Where an authorization or permit is required, suppliers must also have in place all the necessary processes to manage access to export-controlled goods or technology only by authorized staff or entities. This requirement shall be cascaded down to any sub-tier suppliers, ensuring that all parties involved adhere to export control regulations.</p> |

4.4 Competitive behavior and antitrust

| Our principles: | What this means for our suppliers: |
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| <p>At Wingsrom Flying Quality, we are committed to conducting our business in full compliance with all applicable competition (antitrust) laws. We believe in fair competition and avoid any practices that could harm competition or consumers.</p> | <p>At Wingsrom Flying Quality, we require our suppliers to comply with all applicable competition (antitrust) laws in the countries where they operate or sell products. Suppliers must avoid any practices that could restrict competition or harm consumers. Additionally, suppliers must not coordinate market conduct with competitors or their own suppliers in a way that improperly limits competition.</p> |

4.5 Preventing the facilitation of tax evasion

| Our principles: | What this means for our suppliers: |
|---|---|
| <p>At Wingsrom Flying Quality, we are committed to conducting our business with the highest ethical standards and in full compliance with all applicable tax laws. We</p> | <p>At Wingsrom Flying Quality, we require our suppliers to conduct their business in full compliance with all applicable tax laws. Suppliers must not request or expect us to engage in any activities that</p> |

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| will not knowingly assist our customers, suppliers, or any other party in evading taxes or engaging in fraudulent tax practices. | would help them evade taxes. Additionally, suppliers must ensure that all invoices and other contractual documents accurately reflect the agreed-upon commercial terms and do not contain any false information. Furthermore, suppliers must not knowingly assist any other parties in evading taxes when acting on our behalf. |
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4.6 Lobbying and political support

| Our principles: | What this means for our suppliers: |
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| At Wingsrom Flying Quality, we are committed to conducting all lobbying activities in strict compliance with applicable laws and regulations. We believe in ethical behavior in our interactions with governments, agencies, and their representatives. | At Wingsrom Flying Quality, we require our suppliers to conduct all lobbying activities in strict compliance with applicable laws and regulations. Additionally, suppliers must behave ethically in all interactions with governments, their agencies, and their representatives. |

5. Supplier Commitment

5.1 Communication

Suppliers must make the Wingsrom Flying Quality Supplier Code of Conduct available to employees in the business language of the company. Suppliers are encouraged to make their employees aware of the Wingsrom Flying Quality Ethics Line, as detailed below.

5.2 Code Adherence

Suppliers must conform to all aspects of the Wingsrom Flying Quality Global Supplier Code of Conduct, as mandated through the Wingsrom Flying Quality General Conditions of Purchase.

Wingsrom Flying Quality reserves the right to audit against compliance to this Supplier Code of Conduct. Suppliers are expected to ensure that documentation is kept that demonstrates compliance with this Code; Wingsrom Flying Quality may request access to that documentation at any time. Wingsrom Flying Quality may also request access to supplier sites for audit purposes.

Wingsrom Flying Quality reserves the right to terminate contracts in the event of a material breach of the principles set out in the Code. Suppliers are required to disseminate these

expectations throughout their own supply chain and incorporate the principles set out in this document as part of routine sustainable business practices.

5.3 Supplier Ethical Concerns

We speak up about anything that concerns us or that is not in line with the principles set out in this Code without fear of retaliation, and we expect our suppliers to do the same. Retaliation against anyone who speaks up is not acceptable.

Suppliers can raise questions or concerns by speaking to their Wingsrom Flying Quality contacts, anonymously if required by mail. Concerns may be raised either by mail or via telephone.

The full list of telephone numbers for reporting concerns:

+40742171226 – HR Director

+40749412496 - CEO

+40755011768 – Technical Manager

We encourage suppliers to provide a similar anonymous service for raising ethical concerns.

Thank you for your attention!