



SUPPLIER CODE OF CONDUCT

INTRODUCTION

Atlantic Aviation Group (AAG) is a leading independent provider of MRO and related services offering comprehensive airframe maintenance, modification and support services from its headquarters and hangar facilities in Shannon, Ireland and offering Defence Services from Brize Norton, UK.

Our reputation for delivering high-quality airframe maintenance and support services has been built on a proud history and tradition of quality craftsmanship and technical expertise and is supported by a flexible, partnership-based approach to customer relationships. As a people focused organisation, our expert teams work in partnership with our customers to lead the group's core service offering in Base Maintenance, Component MRO, Defence Services, Part 147 Training and related services.

We build long-term customer partnerships based on trust, respect, mutual understanding, and communication. "What we say... is what we do". Trustworthy is one of our Core Values. We create trust by being honest, ethical and respectful. We want to do the right thing for our customers, our people, our partners, our communities and the environment. We expect all our suppliers, including our subcontractors, to adhere to the same ethical standards.

ATLANTIC AVIATION GROUP CORE VALUES



PURPOSE

This Supplier Code of Conduct sets out the minimum requirements for our suppliers, service providers, contractors and subcontractors to be applied where relevant and proportionate to the products and services being provided in line with the AAG Sustainability & ESG Policy.

LAWS AND ETHICAL STANDARDS

The supplier shall comply with all laws and regulations applicable to its business and its operations. Where the requirements of such applicable laws and this Code of Conduct differ or are in conflict, the supplier shall comply with the highest standard consistent with applicable laws. The supplier shall support the principles of the United Nations Global Compact, the UN Universal Declaration of

Human Rights, the UN Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises as well as the 1998 International Labor Organization Declaration on Fundamental Principles and Rights at Work, in accordance with national laws and practice. This especially applies to:

HUMAN RIGHTS AND FAIR LABOUR PRACTICES

Suppliers, service providers, contractors and sub-contractors are required to share our commitment to respecting human rights and labour standards, in particular:

CHILD LABOUR

The supplier shall not employ children under the legal age of employment in any country or local jurisdiction. The supplier shall apply a minimum working age of 15 years, even where local legislation permits younger children to be employed. Workers under the age of 18 shall only perform work in accordance with legal requirements of their country of employment (e.g. with regards to working time and working conditions) and subject to any requirement regarding education or training.

FORCED LABOUR

The supplier shall not use any form of forced, bonded, compulsory labour or modern forms of slavery. All labour must be voluntary. Workers must be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal legal documents). The supplier shall ensure that workers do not pay fees or make any payment connected to obtaining employment throughout the hiring process and the employment period. The supplier shall be responsible for payment of all fees and expenses (e.g. licenses and levies) relating to workers, where legally required.

Punishment, mental and/or physical coercion as well as any other form of human trafficking are prohibited. Disciplinary policies and procedures shall be clearly defined and communicated to the workers.

Suppliers, service providers, contractors and sub-contractors are required to adhere to Atlantic Aviation Group's Anti-slavery and Human Trafficking Policy and are required to take immediate action as soon as they become aware of any instance of Modern Slavery or Labour Exploitation taking place in their businesses or in any part of their supply chains and to notify the Migrant Rights Centre Ireland at +353 (0) 1 889 7570, or email info@mrci.ie

COMPENSATION AND WORKING HOURS

The supplier shall comply with all applicable local laws and mandatory industry standards regarding working hours, including overtime, rest breaks and paid vacation.

The supplier shall compensate its workers in accordance with local minimum wage legislation and terms of applicable collective bargaining agreements as well as with industry standards.

The supplier shall pay workers in a timely manner and clearly convey the basis on which workers are being paid (i.e. receive employment documents in a language they understand). Deductions from wages as a disciplinary measure shall not be allowed.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

The employees of the supplier must be free to join or not to join a union/employee representation of their choice, free from threat or intimidation. The supplier recognizes and respects the right to collective bargaining in accordance with applicable local laws. Where national law completely prohibits free trade union activity, strikes or collective bargaining, the supplier must avoid contributing to further restricting freedom of association through its own behaviour and may not discriminate against, harass or intimidate workers and their representatives for exercising their right to associate, organize and communicate openly with management regarding working conditions.

DIVERSITY AND INCLUSION

The supplier shall promote an inclusive work environment that values the diversity of its employees.

The supplier shall be committed to equal opportunities and not discriminate or tolerate discrimination or harassment with respect to gender, ethnic and national origin, race, colour, religion, age, disability, sexual orientation and identity, or any other characteristic protected by law.

HEALTH & SAFETY

We expect our suppliers to strive to implement the standards of occupational health and safety at a high level by applying a health and safety management approach appropriate for the business.

The supplier shall comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health e.g. drinking water, in order to preserve the safety and health of employees, safeguard third parties and prevent accidents, injuries and work-related illnesses. This includes regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures, including the provision of appropriate Personal Protective Equipment (PPE). Employees are to be adequately educated and trained in health and safety issues in a language they understand.

DATA PROTECTION, INFORMATION SECURITY, AND DISCLOSURE OF INFORMATION

The supplier shall adhere to applicable data protection laws, including security of personal data, as well as to respective regulation, e.g. GDPR, in particular with regard to personal data of customers, consumers, employees and shareholders. The supplier shall comply with all said requirements when personal data is collected, recorded, hosted, processed, transmitted, used or erased.

The information security requirements applicable to suppliers with regards to any data entrusted to their control during and after their engagement with AAG are based on international standards, such as the Code of Practice for Information Security Management. Suppliers should take account of the need to protect the confidentiality, integrity and availability of information. At all times the required level of information security and control to be ensured by suppliers must be commensurate with the sensitivity, value and criticality of the information being processed throughout the lifecycle of the information.

The supplier shall safeguard and make only appropriate use of confidential information. The supplier shall comply with any contractual requirements on data protection and information security and shall not disclose any information that is not known to the public.

BRIBERY AND CORRUPTION

The supplier shall comply with all applicable national and international anti-corruption laws and regulations. The supplier shall not (neither directly nor indirectly) offer, provide or accept anything of value to improperly influence an official act or to secure an improper advantage in order to obtain or retain business. This includes so-called facilitation payments or other benefits provided to public officials for routine non-discretionary actions.

TRADE REGULATION

The supplier shall comply with all applicable export control, sanctions and customs laws and regulations, including Prohibitions & Restrictions ("Trade Laws"). The supplier in particular ensures that the supplier, its beneficial owner(s), all its agents and any other subcontractors used by the supplier are not listed on any applicable Denied Party sanctions lists.

MONEY LAUNDERING & FINANCIAL RECORDS

The supplier shall comply with applicable laws and regulations designed to combat money laundering activities. The supplier shall maintain financial records and reports according to applicable laws and regulations.

FREE COMPETITION

The supplier shall comply with applicable competition and anti-trust laws.

CONFLICTS OF INTEREST

A conflict of interest is any personal or financial interest, any business or personal activity or relationship, prior or current employment, or any obligation that may interfere with the ability to objectively perform job duties and responsibilities or impair independence and objectivity. Such conflict of interest situations include critical relationships such as a relationship by blood or marriage, partnership, participation or an investment in business partners or competitors. The supplier shall immediately disclose any actual or potential conflict of interest related to its activities with AAG.

TAX EVASION

The supplier shall be firmly opposed to all forms of tax evasion and shall conduct business so as to be compliant with applicable tax laws. The supplier shall not, and shall take appropriate steps to ensure its employees, partners and third parties that act for the supplier, do not facilitate tax evasion.

ENVIRONMENT

The supplier shall comply with all applicable environmental laws, regulations and standards as well as implement an effective system to identify their environmental risks and manage those risks.

We expect our suppliers to strive to support AAG's environmental and climate protection commitments through the products and services they deliver, which should be done efficiently by taking the environmental impact into consideration and work to reduce the key environmental impacts of their operations

AAG also expects its suppliers to report relevant data on environmental and climate protection upon request.

We expect our suppliers to take environmental and climate protection appropriately into account in their own operations, for example, by setting climate protection goals for themselves and achieving them.

CONFLICT MINERALS

The supplier shall comply with all applicable laws and resulting due diligence obligations with respect to the sourcing of minerals and materials from conflict affected regions and high-risk areas, which may contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.

COMMUNITY OUTREACH

AAG encourages suppliers to engage positively with their local communities and invest in initiatives and activities that reflect the UN Sustainable Development Goals.

BUSINESS CONTINUITY PLANNING

The supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, supply chain disruptions, communicable disease outbreaks – epidemics or pandemics, information security issues, cyber-attacks). This preparedness includes business continuity plans that protect both employees as well as the environment from the effects of possible serious disruptions that may arise within the domain of operations.

BUSINESS PARTNER DIALOGUE

The supplier shall implement equivalent standards e.g. ethical standards, to the ones laid out in this Code for their own suppliers, as part of fulfilling their contractual obligations.

RESPECT AND DUTY OF CARE

All suppliers are required to act and interact with respect and in good faith with employees of AAG.

The supplier is required to exercise due care in the use of property and equipment entrusted to them, as if the property is their own.

The supplier shall ensure that where it has access to AAG premises and/or systems, it is aware of and has or will implement appropriate measures to protect against Insider Threats and shall engage with AAG where any Insider Threat issue is identified.

When using property or materials that carry a AAG trademark or brand, all suppliers shall exercise particular care as any of their actions or activities may be associated with AAG. Any unauthorized use of branded or trademarked materials or equipment is to be avoided. It is considered a misuse of AAG branded or trademarked materials and equipment if even an appearance of impropriety can be inferred.

COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT

AAG reserves the right to check compliance with the requirements of this Code of Conduct, for example through self-assessments and audits either by AAG or a third party. The supplier shall strive for continuous improvement, such as setting measurable targets on the environment, working conditions or diversity, and reporting on progress for sustainability. In case a breach is identified, the supplier shall create an incident report and present a corrective action plan.

The terms and conditions set forth in this Supplier Code of Conduct reflect AAG's values and commitment to its customers, the communities which we serve and the protection of the environment. Therefore, any breach of these terms and conditions must be cured. Without prejudice to any other contractual remedies AAG may be entitled to, any failure to cure such a breach immediately will cause AAG to consider ending the commercial relationship.

REPORTING IRREGULARITIES

Suppliers are required to report any violations from what is outlined in this Code of Conduct or AAG policies to the appropriate Atlantic Aviation Group's contact. We aim to work together to prevent non-compliance in our business and supply chain.

CONTINUOUS IMPROVEMENT

Suppliers, service providers, contractors and sub-contractors are invited to approach Atlantic Aviation Group with product and service innovations that can support us and our customers to realise our sustainability ambitions and/or reduce costs. Sustainability improvements can include reducing the

use of materials, providing new uses for waste resources, reducing water, greenhouse gas emissions or providing circular economy solutions. AAG values the open exchange of new ideas and is willing to explore new opportunities jointly with suppliers.

Signed: Shane O'Neill

Title: Chief Executive Officer

Date: 22nd April 2025