

# AEROTEH S.A.



## Bucharest Romania

### 2026



**CODE OF CONDUCT FOR SUPPLIERS**



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# CODE OF CONDUCT

## for Suppliers of AEROTEH S.A.

### 1. Introduction

#### 1.1. Purpose of The Code

The AEROTEH's Supplier Code of Conduct is designed to establish a clear set of ethical principles and standards that we wish adopted by our suppliers. The purpose of this code is to ensure that the activities carried out within our procurement chain reflect our ongoing commitment to integrity, respect for human rights, environmental protection and the promotion of responsible business practices, in full consistency with the "*Sustainable Development Statement of AEROTEH S.A.*"<sup>1</sup>. This code serves as a basis for building and maintaining a relationship of trust and mutual respect between AEROTEH S.A. and its commercial partners, as well as as a tool for gradually aligning the procurement chain with the Sustainable Development directions assumed by AEROTEH S.A.

#### 1.2. Applicability

The Code of Conduct for AEROTEH's Suppliers applies to all companies and individuals that provide goods or services to AEROTEH S.A., regardless of location, size or nature of the business. It is the responsibility of each supplier to ensure that their business practices are in line with the provisions of this code and to implement appropriate measures to promote compliance with the specific principles within their own procurement chains.



***AEROTEH S.A. reserves the right to request verification of the compliance of suppliers with the provisions of this Code and to take measures accordingly.***

In addition to this Code, AEROTEH S.A. may invite significant suppliers, depending on the relevance and risks in the supply chain, to sign a "*Letter of Intent – Sustainable Procurement*", included as an annex to this document. The signing of the letter has the role of consolidating a common benchmark of dialogue and gradual alignment with the directions of Sustainable Development in procurement, without modifying or replacing the existing contractual obligations and without affecting the applicability of this Code.

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<sup>1</sup> <https://aeroteh-sa.ro/wp-content/uploads/2018/04/Declaratie-Dezvoltare-Durabila.pdf>

In application of this Code, AEROTEH S.A. may request from suppliers reasonable information and evidence regarding the Sustainable Development practices relevant to the goods/services delivered (e.g.: environmental practices, working conditions, ethics, security measures, traceability), in line with the directions and implementation stages set out in the "*Sustainable Development Statement of AEROTEH S.A.*", without prejudice to contractual obligations and confidentiality.

### **1.3. The Commitment of AEROTEH S.A. and Its Suppliers to the Principles of Sustainable Development**

AEROTEH S.A. appreciates that together with its suppliers they promote a firm commitment to the observance of the principles of Sustainable Development in all aspects of their activities. This commitment is reflected in the adoption of practices that reduce the negative impact on the environment, ensure fair and respectful treatment for employees and contribute to the well-being of the communities in which we operate. In accordance with the "*Sustainable Development Statement of AEROTEH S.A.*", through collaboration and dialogue, Sustainable Development is approached as a gradual, long-term path, which includes:

- (i) understanding and self-assessment in respect of relevant international standards;
- (ii) monitoring and improving performance through indicators (KPIs) in key areas (Environment; Labor and Human Rights; Business Ethics; Sustainable Procurement);
- (iii) decarbonization of the value chain, from suppliers to customers.

Consequently, AEROTEH S.A. and its suppliers aim to collaborate, in proportion to the relevance and risks in the supply chain, in order to:

- assessing the carbon footprint and major impact factors, including in the procurement chain, where relevant;
- identification and application of reduction measures (resources, energy, waste, emissions, transport, hazardous substances);
- exchange of best practices, within the usual limits of privacy and intellectual property rights.

## **2. Definitions**

### **2.1 Relevant Notions**

The general and specific terms, as defined below, play a important role in understanding and applying the contractual provisions between AEROTEH S.A. and its suppliers. These terms are essential for the correct and uniform interpretation of the obligations and rights of each party involved.

#### **General Terms:**

- **AEROTEH S.A.:** The beneficiary entity within the contract or order, which requests the provision of equipment and services.
- **Supplier:** The entity that, having a dsu contractual relationship based on order with AEROTEH S.A., undertakes to provide the specified equipment and services.
- **Contracting parties:** Term that collectively designates AEROTEH S.A. and the supplier, implying a mutual responsibility in the fulfillment of the contract or order.

#### **Specific terms:**

- **Year:** The calendar period of 365 or 366 days, according to the Gregorian calendar.
- **Sustainable Development Statement of AEROTEH S.A.:** The strategic commitment document through which AEROTEH S.A. reaffirms its directions and stages of sustainable development implementation, including the intensification of

self-assessment against relevant standards, the adoption of KPIs by areas and the orientation towards the decarbonization of the value chain (suppliers-customers), in a gradual and collaborative manner.

- **Documents:** Any informative material, including technical and administrative documentation necessary for the fulfillment of contractual provisions.
- **Equipment:** All physical assets, including machinery, machinery and devices, specified in the contract, which must meet the agreed technical standards and be fit for the intended use.
- **Majeure force:** External, unforeseeable and beyond the control of the parties, which prevent the fulfillment of contractual obligations, including natural disasters, armed conflicts and other legally recognized force majeure situations.
- **Confidential information:** All data and information, regardless of the form of presentation, relevant to the performance of the contract and which are exchanged between the parties in the context of the fulfillment of contractual obligations.
- **Country of Origin:** The country in which the equipment was manufactured, determined by the place where a substantial transformation of raw materials resulted in a new and distinct finished product.
- **Minutes of Acceptance (MoA):** Official written record of findings and agreements between the parties regarding the acceptance of equipment or the completion of contractual milestones.
- **Occupational Health and Safety (OHS):** The set of measures and procedures implemented to ensure the safety and health of employees during the performance of the contract/order.
- **Services:** All activities related to the equipment delivery process, including but not limited to transportation, insurance, installation and technical assistance, necessary for the proper operation of the equipment.
- **Standards:** The set of applicable technical standards, requirements, regulations and legislation governing the quality and performance of the equipment and services supplied.
- **Latent defect:** Equipment or service malfunctions, not apparent on standard inspection, that may affect their functionality or performance.
- **Day:** A 24-hour unit of time, recognized regardless of the day of the week.

## ***2.2 Applicability of Terms***

The terms defined above are applicable throughout the duration of the contract/order between AEROTEH S.A. and the supplier, ensuring a common basis of understanding and interpretation. These terms must be respected by all parties involved for effective collaboration and to avoid any ambiguities or misunderstandings. By clarifying and precisely defining these terms, a solid contractual framework is created, essential for the success of the partnership between AEROTEH S.A. and its suppliers.

## **3. General principles**

### ***3.1. Compliance with the laws***

AEROTEH's suppliers are obliged to comply with all national and international laws, regulations and standards applicable to their business activities. This includes, but is not limited to, labor law, the environment, product safety, fair competition and intellectual property rights.



***Compliance with the law is the foundation on which our operational integrity is built and is essential for maintaining a strong and trustworthy partnership with all our stakeholders.***

### **3.2. Business Integrity and Ethics (EA)**

AEROTEH S.A. expects all its suppliers to demonstrate the highest integrity and adhere to EA standards. This implies conducting business activities in a fair, transparent and responsible manner, avoiding any form of corruption, fraud or other unfair practices. Suppliers must promote a business environment where fairness and honesty are the core values, ensuring that all transactions and interactions are carried out in accordance with ethical principles.

### **3.3. Conflicts of interest**

Providers must avoid any situation that could lead to a conflict of interest or that could be perceived as such. This includes situations in which the personal interests, direct or indirect, of the supplier's employees conflict with their obligations towards the company or AEROTEH S.A. Suppliers must immediately inform AEROTEH S.A. of any situation that could represent a conflict of interest, ensuring that all decisions are taken in the best interest of the partnership and without inappropriate external influences.

AEROTEH suppliers are encouraged to implement internal policies and procedures that support compliance with these general principles, thus promoting a culture of integrity and ethics in all aspects of their business. By adhering to these principles, AEROTEH S.A. and its business partners reaffirm their commitment to achieving high standards of performance and responsibility in all their operations.

## **4. Sustainable Development (DD)**

### **4.1. DD Principles**

- **Resource efficiency:** Promoting efficiency and reducing resource waste at all levels of the production and service delivery process. This involves the responsible use of raw materials, water and energy, as well as the adoption of technologies that minimise environmental impact.
- **Reducing emissions:** Implementing concrete measures to reduce greenhouse gas emissions and other pollutants, including by assessing and reducing the carbon footprint in the value chain, where relevant. Encouraging the use of renewable energy and practices that contribute to the fight against climate change.
- **Waste management:** Adopting effective strategies for waste management, including recycling, reuse, and reducing waste at source. Ensuring safe and responsible disposal of waste that cannot be recycled or reused.
- **Biodiversity conservation:** Protecting natural habitats and biodiversity by avoiding activities that can lead to the destruction or degradation of ecosystems. Promoting the sustainable use of natural resources and protecting endangered species.
- **Social responsibility:** Recognition of the impact of economic activities on local communities and the environment and commitment to contribute positively to sustainable social and economic development.

### **Alignment with AEROTEH's Sustainability Roadmap (indicative milestones)**

In line with the "*Sustainable Development Statement of AEROTEH S.A.*", suppliers are encouraged, proportionate to the relevance of their deliveries and associated risks, to progressively align with AEROTEH's Sustainability Roadmap (indicative milestones), which may include:

- **2022–2026:** awareness, self-assessment and contribution to carbon footprint assessment (subject to relevance);
- **2027–2030:** collaboration and sharing of best practices to accelerate effective measures;
- **2031–2045:** Strengthening significant impact reductions (energy, emissions, waste), in line with the legal framework and stakeholder requirements.

### **Monitoring and reporting**

- **Periodic assessments:** Conducting regular environmental impact assessments of activities to identify opportunities for continuous improvement and ensure compliance with DD objectives.
- **Transparent reporting:** Transparent and regular reporting of environmental performance, including the achievement of sustainability targets, environmental protection initiatives and the results of impact assessments, including through relevant indicators (KPIs), where applicable.

By complying with these general obligations, AEROTEH S.A. and its suppliers affirm their commitment to a sustainable future, recognizing that environmental protection and the adoption of the principles of sustainable development are essential for the long-term success of the business and for the well-being of communities and the planet.

## **4.2 Environment (PM)**

PM is a central pillar in the DD strategy adopted by AEROTEH S.A. and requested by its suppliers. This sub-chapter details the specific measures to be implemented for pollution prevention and efficient waste management, highlighting the strong commitment to the conservation of natural resources and minimising the negative impact on the environment.

### **4.2.1. Basic principles**

AEROTEH's suppliers are encouraged to adopt basic principles in PM, which include minimizing the impact of operations on the environment, promoting energy efficiency and responsible use of natural resources. These principles underpin the shared commitment to a greener and more sustainable future.

### **4.2.2. Waste management and recycling**

We believe in increasing the responsibility of AEROTEH's suppliers to implement efficient waste management systems, to promote the reduction, reuse and recycling of materials. This involves:

- **Waste Hierarchy:** Application of the waste hierarchy principle that prioritizes the prevention of waste generation, followed by reuse, recycling, recovery and, as a last resort, disposal.
- **Separate Waste Collection Systems:** Implement and encourage selective collection systems for recyclable, organic and hazardous waste, to facilitate recycling and recovery.
- **Recycling Partnerships:** Working with recycling facilities providers and specialized organizations to ensure the efficient treatment and recycling of waste generated by the company's activities.

- **Waste Minimization at Source:** Adopting efficient production practices that reduce the amount of waste generated, including optimizing processes and using sustainable materials.
- **Extended Producer Responsibility:** Ensuring compliance with the principles of extended producer responsibility, which involves taking responsibility for the entire life cycle of products, from production to final waste disposal.

#### **4.2.3. Reducing emissions, preventing pollution and conserving resources**

AEROTEH S.A. hopes that its suppliers will consider as a priority the reduction of greenhouse gas emissions and the conservation of resources through:

- **Clean technologies:** The adoption and promotion of energy-efficient, low-emission technologies that reduce pollutant emissions and resource consumption.
- **Emissions management:** Implementation of systems for monitoring and controlling emissions of greenhouse gases, particulate matter and other pollutants. Strict compliance with legal emission limits for all activities.
- **Prevention of water pollution:** Application of industrial wastewater pretreatment measures before discharge into public sewerage systems or the natural environment. Implementing water conservation practices and reducing consumption.
- **Efficient transport:** Optimising procurement chains to reduce transport distances and thus carbon emissions.
- **Energy saving:** Promoting energy efficiency in all operations and production processes.
- **Hazardous Substances Management:** Inventory and proper management of hazardous chemicals and materials to prevent spills and contamination of soil and water.
- **Carbon footprint and value chain:** To the extent relevant to the goods/services provided to AEROTEH, the supplier is encouraged to know, monitor and reduce the carbon footprint associated with its own operations and, gradually, of the significant elements in its procurement chain, thus contributing to AEROTEH's goal of decarbonizing the value chain (suppliers-customers), in the phased logic assumed by *the Sustainable Development Declaration*.

#### **4.2.4. Innovation & DD**

AEROTEH S.A. encourages its suppliers to invest in research and development to find innovative and sustainable solutions that can reduce the impact on the environment.

This commitment includes:

- Developing green products and services that contribute to the circular economy.
- Implementing business practices that support biodiversity conservation and ecosystem protection.
- Working with environmental organizations and other stakeholders to promote sustainability initiatives locally and globally.

AEROTEH's suppliers are essential in our joint efforts to build a sustainable future. By adopting these green practices and committing to innovation and DD, suppliers contribute not only to the PM, but also to the long-term success of business partnerships.

### **4.3. Labor and Human Rights (DO)**

Responsibility towards DO is a central aspect of the cooperation between AEROTEH S.A. and its suppliers. This section outlines the specific commitments that suppliers

are encouraged to comply with in order to ensure an ethical and fair working environment.

#### **4.3.1. Respect for fundamental human rights**

AEROTEH suppliers are obliged to respect internationally recognized fundamental human rights in all their operations. This commitment includes preventing any form of abuse or unfair treatment by ensuring that all business activities are conducted in a way that protects and promotes respect for human dignity.

- **Non-discrimination:** Promoting equality and preventing any form of discrimination on the basis of race, colour, sex, language, religion, political opinion or any other condition.
- **Freedom of association:** Recognition of workers' right to form and join trade unions and to participate in collective bargaining, in accordance with local law.
- **Occupational safety and health:** Implementing occupational safety and health measures, including appropriate employee training and the provision of personal protective equipment, to create a safe working environment for all employees.
- **Combating harassment and abuse:** Creating a work environment that excludes harassment, physical or verbal abuse and any other forms of intimidation or inappropriate behaviour.

#### **4.3.2. Working conditions and employee safety**

Suppliers are responsible for ensuring a safe and healthy working environment in accordance with national and international standards. This includes implementing measures to prevent workplace accidents, ensuring appropriate protective equipment, and training employees on safe working practices.

##### **Compliance with legal working conditions**

- **Compliance with legislation:** Suppliers and subcontractors are required to comply with all applicable laws and regulations regarding working conditions in the jurisdictions in which they operate. This includes legislation on pay, working hours, holidays and job security.
- **Fair working conditions:** Ensuring fair working conditions, including fair pay, reasonable working hours, adequate breaks and a safe and healthy working environment.

#### **4.3.3. Prohibition of forced labor and child labor**

AEROTEH S.A. and its suppliers condemn any form of forced labor or child labor in all their activities and procurement chain. Suppliers must ensure that all of their employees have been hired on the basis of free and informed consent, without being subjected to intimidation, threats, or any other form of coercion. It is important that the employment of minors respects the minimum legal age of employment and does not interfere with their education.

AEROTEH suppliers will implement verification procedures to ensure compliance with these standards.

#### **4.3.4. Equal opportunities and non-discrimination**

Providers are encouraged to promote a work environment that respects the principle of equal opportunities and is free from any form of discrimination, whether it is race, color, sex, religion, sexual orientation, age, national or social status, or disability. Employment and advancement decisions must be based solely on qualifications, skills and performance.

#### **4.3.5. Freedom of association and the right to collective bargaining**

Suppliers are encouraged to recognize and respect the right of employees to form and join unions and bargain collectively, without retaliation, interference, or intimidation. It

is essential to ensure an open and constructive dialogue between employers and employee representatives in order to promote harmonious labor relations.

By complying with these principles, AEROTEH's suppliers contribute to the promotion of an ethical and responsible procurement chain, which protects and improves working conditions and employees' rights. These practices not only ensure compliance with international standards, but also strengthen partnership relationships based on mutual respect and integrity.

#### **4.3.6. Occupational Health and Safety (OSH)**

OSH are essential aspects of a responsible and sustainable working environment. AEROTEH S.A. and its suppliers are committed to ensuring a safe and healthy workplace for all employees, subcontractors and third parties involved in their operations. This sub-chapter details the supplier's priorities in relation to OSH and the management of hazardous substances.

##### **Obligations of the supplier in the field of OSH**

- **OSH policies and procedures:** The supplier must develop, implement and maintain OSH policies and procedures in accordance with national legislation and relevant international standards. These policies must cover all aspects related to the prevention of accidents and occupational diseases.
- **Training and awareness:** Ensuring adequate training for all employees on proper OSH practices, use of personal protective equipment, emergency procedures and management of hazardous substances.
- **Risk assessment:** Conducting regular risk assessments in the workplace to identify potential hazards and implement appropriate preventive measures.
- **Monitoring and review:** Continuous monitoring of working conditions and regular review of the effectiveness of OSH measures to identify and implement necessary improvements.

##### **Management of hazardous substances**

- **Identification and labelling:** The supplier must identify all hazardous substances used in its operations and ensure that they are correctly labelled in accordance with the regulations in force.
- **Safety Data Sheets (SDS):** Keeping and making available safety data sheets for all hazardous substances, providing detailed information on chemical properties, first aid measures, firefighting measures and exposure control measures.
- **Specific training:** Providing specific training for employees who handle or are exposed to hazardous substances, training that must include information about potential risks and appropriate protective measures.
- **Storage and handling:** Implementing safe storage and handling procedures for hazardous substances to prevent accidents and unauthorized exposures.
- **Emergency preparedness and response plans:** Development and implementation of emergency preparedness and response plans to effectively address incidents involving hazardous substances, including spills, fires, or other emergency situations.

By fulfilling these measures, suppliers and subcontractors align themselves with AEROTEH's commitment to promoting a safe and healthy work environment, contributing to the protection of employees and the environment, and to the continuous improvement of OSH practices. These measures reflect not only compliance with legislation, but also commitment to the fundamental values of sustainability and corporate responsibility.

## 4.4 Business ethics (EA)

EA represents a fundamental pillar for AEROTEH S.A. and its suppliers, being essential in establishing and maintaining sustainable, transparent and fair business relationships. This subchapter details the ethical commitments that all contractual parties are encouraged to abide by in all their interactions and transactions.

### Fundamental ethical commitments

- **Integrity and honesty:** All parties are committed to acting with integrity and honesty in all aspects of their business, avoiding any form of misleading or fraudulent behavior.
- **Transparency:** Promote a culture of transparency in the communication and reporting of relevant information, ensuring that all stakeholders have access to accurate and timely information.
- **Conflict of interest:** Identifying and properly managing any conflict of interest that could affect decisions and actions within the business relationship. The parties are obliged to disclose any potential conflict of interest situation.
- **Intellectual property protection:** Enforcing intellectual property rights and ensuring that all transactions and uses of protected materials are conducted in accordance with applicable laws.
- **Zero-Tolerance Policy on Corruption, Bribery and Undue Influence:** Adopt strict policies against corruption, bribery and any other forms of improper influence. Implementing preventive measures and reporting mechanisms to combat these practices.

### Specific implementation measures

- **Code of Conduct:** Developing and implementing an ethical code of conduct, to serve as a guide for the business conduct of employees and contractual parties.
- **Training and education:** Providing training programs for employees and business partners to ensure understanding and adherence to established ethical standards.
- **Reporting mechanisms:** Implementing open and anonymous channels for reporting ethical violations, ensuring the protection of whistleblowers and treating all complaints and reports seriously.
- **Ethical audits and assessments:** Conducting regular audits to assess compliance with ethical principles, identifying areas for improvement and applying corrective measures where necessary.

Through the specific commitments and measures described, AEROTEH S.A. and its suppliers reaffirm their constancy towards promoting an EA culture, contributing to the creation of a responsible, transparent and trustworthy business environment. These ethical principles not only improve the reputation and long-term success of the companies involved, but also increase trust between business partners, employees and other stakeholders.

## 4.5 Sustainable procurement (AS)

AS is a key element in AEROTEH's DD strategy, reflecting the commitment to integrate social, environmental and ethical considerations into the selection and evaluation process of suppliers and subcontractors. This sub-chapter details the criteria and procedures by which AEROTEH S.A. ensures that its business partners share the same values and commitments to sustainability, in accordance with the "*Sustainable Development Statement of AEROTEH S.A.*", which sets out a gradual path of maturation and collaboration in the supply chain.

### Alignment and Dialogue Tools in AS

In addition to the evaluation criteria and procedures described in this chapter, AEROTEH S.A. uses, as the case may be, the "*Letter of Intent – Sustainable Procurement*" (Annex 1) as a marketing tool.:

- **principled alignment** of significant suppliers to procurement DD directions;
- **clarifying expectations** regarding environmental footprint awareness, identifying levers for improvement and strengthening social and governance dimensions;
- **structured** and progressive dialogue, proportional to the specificity of the supplier and the nature of the goods/services delivered, in line with the indicative implementation stages assumed by AEROTEH S.A. through *its Sustainable Development Statement*.

The signing of the "*Letter of Intent – Sustainable Procurement*" does not modify and does not create, by itself, new obligations towards the contract/order, but expresses a convergent common intention and supports the coherence of the collaboration framework, in accordance with this Code.

#### **Additional criteria for the selection of suppliers**

- **Compliance with environmental standards:** Assessing suppliers' commitment to the PM, including managing resources, reducing carbon emissions and minimising the impact of operations on the environment.
- **Ethical work practices:** Verification of suppliers' compliance with workers' fundamental rights, including safe and fair working conditions, absence of forced or child labour, and the right to freedom of association.
- **Social responsibility:** Assessing the involvement of providers in the community and their contribution to social, educational or environmental projects.
- **Transparency and traceability:** The ability of suppliers to provide transparent and verifiable information about the origin of materials, production processes and their purchasing chain.

#### **Assessment procedures**

- **Audits and inspections:** Conducting regular audits and inspections at the premises of suppliers and subcontractors to verify compliance with sustainability criteria and business ethics.
- **Risk assessments:** Implement a risk assessment process to identify potential sustainability and ethical issues in the procurement chain and develop action plans to mitigate their effects.
- **Sustainability certifications:** Encouraging and preferring suppliers who hold internationally recognized sustainability certifications, such as ISO 14001 for environmental management or SA8000 for social practices.
- **Long-term commitments:** Developing long-term relationships with suppliers who demonstrate a constant commitment to the principles of sustainable development and the continuous improvement of their environmental and social performance.
- **Request for data and evidence (proportionate, justified):** As part of the assessments, AEROTEH S.A. may request reasonable information from significant suppliers regarding: relevant consumption, waste management practices, energy efficiency measures, emission reduction initiatives, and, where applicable, carbon footprint elements associated with deliveries. The provision of this information is done within the limits of confidentiality and the contractual framework.

#### **Continuous monitoring and improvement**

- **Feedback and dialogue:** Establishing a constructive dialogue with suppliers to discuss the results of assessments and identify opportunities to improve sustainability practices.

- **Training programs:** Providing training and technical assistance programs for suppliers and subcontractors who require support to meet the sustainability standards of AEROTEH S.A.
- **Periodic evaluations:** Conducting regular performance evaluations of suppliers and subcontractors to ensure that they continue to comply with sustainability and EA criteria.

By adopting these criteria and procedures for AS, AEROTEH S.A. reaffirms its commitment to operate responsibly and promote sustainability standards throughout its procurement chain. This approach contributes not only to the achievement of the DD's own objectives.

## 5. Privacy and protection of personal data

### 5.1. Privacy of Information

#### 5.1.1. General Provisions

The contractual relationship between AEROTEH S.A. and its partners, including suppliers, subcontractors and third-party supporters, is based on strict respect for confidentiality. These provisions ensure the protection of data and information exchanged or created during the performance of the contract, essential for the protection of the activities, strategies and commercial interests of all parties involved.

#### 5.1.2. Obligation of confidentiality

- **Duration of the obligation:** This obligation applies throughout the duration of the contract and continues for a period of two years after its termination or expiry, covering all types of information communicated, regardless of the method of transmission or marking as confidential.
- **Applicability:** The obligation of confidentiality extends equally to all participants involved, including subcontractors and third-party supporters. The provider must ensure compliance of its entire network, ensuring that privacy standards are consistently adhered to.

#### 5.1.3. Specific responsibilities

- **Data protection:** All actors involved are obliged to adopt appropriate security measures to prevent unauthorised access to or compromise of confidential information.
- **Limitation of access:** Access to sensitive data is strictly restricted to personnel with justified operational needs, who must be adequately trained and engaged through confidentiality agreements.
- **Incident management:** Any security breach or unauthorized access to information must be reported immediately, followed by diligent efforts to minimize the impact of the incident.

#### 5.1.4. Sanctions

Privacy breaches can lead to severe penalties, including financial compensation for damages caused and the possibility of termination of the contract. Compliance with these clauses is crucial for maintaining a business environment based on mutual trust and security.

#### 5.1.5. Exceptions and consequences

##### Exceptions to the obligation of confidentiality

- **Parties' Agreement:** Disclosure is permitted with the written consent of the other party.

- **Legal obligations:** Disclosures required by law are acceptable provided that prior notice is given and limited to strictly necessary information.
- **Public information:** Information that is already publicly available or independently developed is not subject to privacy restrictions.

### 5.1.6. Penalties for violation

- **Compensatory damages:** Violation of confidentiality clauses may require the payment of compensation, determined by the negative impact on the affected party.
- **Contractual penalties:** The contract may provide for specific penalties for violations, which are in addition to any compensation.
- **Termination of the contract:** Serious breaches may justify unilateral termination of the agreement, paving the way for further legal action.
- **Preventive measures:** The affected party may seek legal action to prevent further disclosures and protect its interests.

By rigorously detailing exceptions and sanctions, AEROTEH S.A. and its collaborators demonstrate their deep commitment to the security and integrity of information, fundamental for the success and stability of their contractual relationships.

## 5.2. *The importance of ensuring the protection of personal data*

### 5.2.1. Compliance with the General Data Protection Regulation (GDPR)

**Current context:** In an era marked by significant technological advances and the globalization of services, the protection of personal data has become a central pillar of individual privacy and security. The GDPR imposes a harmonized legislative framework in the European Union, dedicated to safeguarding the fundamental rights of individuals, with a particular focus on the protection of personal data. For AEROTEH S.A. and its suppliers, compliance with the GDPR and the corresponding national legislation is a sine qua non condition.

### 5.2.2. Essential responsibilities:

- **Adoption of the GDPR principles:** It is imperative that all entities involved in the processing of personal data adhere to the basic principles of the GDPR – legality, transparency, purpose limitation, data minimization, accuracy, integrity and confidentiality, all under the umbrella of responsibility.
- **Guaranteeing the rights of data subjects:** Data subjects enjoy extensive rights, such as access, rectification, erasure, restriction of processing, data portability and the right not to be subject to automated decision-making. AEROTEH suppliers must ensure the effective exercise of these rights.
- **Implementation of security measures:** It is essential to adopt appropriate technical and organisational measures to ensure an appropriate level of security, protecting data against unauthorised access, unlawful processing, accidental loss or destruction.
- **Security incident management:** Any data breach that poses risks to individual rights and freedoms requires prompt notification to supervisory authorities and, where applicable, affected data subjects.
- **Vigilance in the selection of subcontractors:** Providers must ensure that any third party involved in the processing of data on their behalf complies with the obligations of the GDPR, including through contractual clauses that ensure an adequate level of data protection.

### 5.2.3. Data processing and disclosure: framework and procedures

- **Data collection:** It must be carried out legally and transparently, with a clearly defined basis and strictly limited to contractual and legal needs.
- **Use of data:** Clear and precise information of data subjects about the use of their data, guaranteeing transparency and limiting access to data only to authorized personnel.
- **Data disclosure:** Any transfer of personal data to third parties is subject to rigorous control, respecting the consent of the data subject or the applicable legal provisions, and is protected by confidentiality agreements with clauses dedicated to data protection.
- **Data security:** Having robust security measures in place is crucial to protect data from the risks of loss, unauthorized access, or uncontrolled disclosure.
- **Accountability and compliance:** Maintaining detailed documentation of processing processes and conducting data protection impact assessments demonstrates commitment to GDPR compliance.

By strictly adhering to these principles and procedures, AEROTEH S.A. and its partners reaffirm their commitment to the protection of privacy and personal data, while respecting the rigors of the legislation in force. This approach not only ensures legal compliance, but also strengthens trust in commercial and contractual relationships by promoting transparent and secure data processing practices.

### 5.2.4. Cybersecurity and data breach protection

IT security occupies a central position in the risk management strategy for AEROTEH S.A. and its partners, with the primary objective of protecting critical information infrastructures and preventing data leaks. This section highlights the essential responsibilities of the suppliers with which AEROTEH S.A. collaborates, in order to ensure a secure and resilient digital environment.

#### Fundamental responsibilities of suppliers

- **Implementing advanced security measures:** Suppliers are required to adopt the latest security technologies and protocols to protect networks, systems, and data from cyberattacks, malware, and other cyber threats. This includes firewalls, intrusion detection and prevention systems, encryption of data in transit and at rest, and multi-factor authentication.
- **Regular vulnerability assessment:** Suppliers must conduct security audits and vulnerability assessments on a regular basis to identify and remediate potential weaknesses in the IT infrastructure. These assessments must be carried out by independent and specialised third parties to ensure the objectivity and completeness of the analysis.
- **Employee training and awareness:** A crucial element in preventing data leaks is the continuous training of vendors' employees on IT security best practices. This includes regular training on how to recognize and report phishing attempts, secure password management, and compliance with security policies.
- **Security incident management:** Vendors must have clear and effective procedures for detecting, reporting, and managing security incidents. This involves promptly notifying AEROTEH S.A. in the event of security breaches, cooperating in investigations and implementing remedial measures to limit the impact.
- **Control of access to data:** Access to data and systems must be strictly controlled and limited based on the principle of need to know. Providers must use access control policies, segregation of duties, and access audits to prevent unauthorized access or unintentional disclosure of data.

- **Review and update security policies:** Security policies and procedures should be reviewed and updated regularly to reflect evolving cyber threats and changes in technology. Suppliers must work with AEROTEH S.A. to ensure that their policies are aligned with the best practices and regulations in force.
- **Regulatory compliance:** Suppliers are responsible for compliance with all relevant data security and information protection laws and regulations, including industry-specific standards and contractual requirements set by AEROTEH S.A.

By assuming these responsibilities, AEROTEH suppliers contribute essentially to the creation of a secure digital ecosystem, thus protecting the interests of the company, its customers and partners against the increasingly sophisticated risks and threats in cyberspace.

## 6. Subcontracting and third-party suppliers

### 6.1. Subcontracting procedures

Subcontractarea este un element esențial în cadrul operațiunilor AEROTEH S.A., permițând accesul la expertiză specializată și capacitate suplimentară atunci când este necesar. Pentru a asigura că toate activitățile subcontractate îndeplinesc standardele înalte ale companiei, AEROTEH S.A. stabilește obligații și proceduri clare pentru furnizorii care aleg să subcontracteze parte din responsabilitățile contractuale.

### 6.2. Obligations of the supplier in the subcontracting process

- **Notification and approval of AEROTEH S.A.:** Suppliers are obliged to notify in writing and obtain the written approval of AEROTEH S.A. before subcontracting any part of the work. This includes providing details of the capacity and qualifications of the proposed subcontractor.
- **Evaluation of subcontractors:** Suppliers must carry out a rigorous evaluation of potential subcontractors, ensuring that they meet AEROTEH S.A.'s standards in terms of quality, EA, sustainability and legal compliance.
- **Contractual agreements:** Contracts concluded with subcontractors must reflect the specific requirements of AEROTEH S.A., including clauses related to confidentiality, data protection, intellectual property rights and reporting obligations.
- **Performance monitoring:** Suppliers are responsible for continuously monitoring subcontractors' performance, including compliance with project plans, deadlines, and quality standards.
- **Compliance with legislation and regulations:** Ensuring that subcontractors comply with all applicable laws and regulations, including those relating to occupational health and safety, PM and workers' rights.

### 6.3. Specific subcontracting procedures

- **Pre-selection documentation:** Suppliers must prepare and submit to AEROTEH S.A. the necessary documentation for the pre-selection of subcontractors, including risk assessments, references and evidence of technical and financial qualifications.
- **Quality Management Plans:** Development and implementation of Quality Management Plans (QMPs) for all subcontracted activities, ensuring alignment with the quality standards of AEROTEH S.A.
- **Training and development:** Suppliers are encouraged to provide subcontractors with access to training and resources to continuously improve working practices and ensure that subcontractor personnel are well informed about project requirements.

- **Liability and insurance:** Suppliers must ensure that subcontractors have adequate insurance to cover any potential risk or damage that may result from their activities.
- **Periodic Assessments and Feedback:** Conducting regular performance evaluations of subcontractors and providing constructive feedback to foster continuous performance improvement.

By establishing clear obligations and procedures for the subcontracting process, AEROTEH S.A. and its suppliers ensure that all subcontracted activities are carried out to the highest standards, thus maintaining the integrity and quality of the entire procurement chain.

## **6.4. Subcontractors and Third-Party Support Providers**

Within the broader framework of AEROTEH's activities and contractual relationships, subcontractors and third-party support providers may play an essential role in achieving project and operational objectives. This section sets out the rules governing their engagement, oversight, and accountability, to ensure alignment with AEROTEH's standards and full compliance with all applicable legal, ethical, and sustainability requirements.

### **6.4.1. Definition of Third-Party Support Provide**

Third-party support providers include any legal entities or individuals who provide support and resources to the main supplier in performing its contractual obligations toward AEROTEH S.A., without being a direct party to the main contract. Such support may include specialized services, resource provision, consultancy, or any other necessary assistance.

### **6.4.2. Rules for Engaging Third-Party Support Providers**

- **Prior written approval:** Suppliers must obtain AEROTEH S.A.'s prior written approval before engaging any third-party support provider in a project. This includes providing details regarding the third party's competencies and experience, as well as justification for the need to involve them.
- **Compliance assessment:** Third-party support providers must be assessed to ensure compliance with AEROTEH's environmental, business ethics, occupational health and safety standards, and any other specific requirements set by AEROTEH.
- **Contractual arrangements:** Relationships with third-party support providers must be formalized through a contractual agreement that includes specific clauses on compliance with applicable laws, labor protection standards, human rights requirements, and sustainability principles.

### **6.4.3. Responsibilities of Third-Party Support Providers**

- **Legal and ethical compliance:** Third-party support providers must comply with all applicable laws and regulations relevant to their activities and adhere to the ethical and business principles promoted by AEROTEH S.A.
- **Reporting and transparency:** Third-party support providers must submit periodic reports on progress and compliance of their activities, ensuring a high level of transparency and enabling effective performance monitoring.
- **Risk management:** Third-party support providers must proactively identify and manage any risks that could affect contractual performance or AEROTEH S.A.'s reputation, including environmental, social, and governance (ESG) risks.

### **6.4.4. Monitoring and Evaluation**

- **Ongoing oversight:** AEROTEH S.A. and its suppliers must continuously monitor the performance and compliance of third-party support providers through audits, on-site inspections, and other assessment methods.

- **Feedback and continuous improvement:** Third-party support providers must be responsive to feedback and cooperate with AEROTEH S.A. and its suppliers to implement continuous improvements in working practices and processes.

By establishing clear rules for the engagement and management of third-party support providers, AEROTEH S.A. ensures that its broader supply chain and extended collaborations remain aligned with its sustainability, ethics, and compliance commitments, supporting the achievement of strategic objectives in a responsible and sustainable manner..

## 7. Applicable law

In the context of the collaboration between AEROTEH S.A. and its suppliers, compliance with the applicable legislation is fundamental. This chapter details the obligations of suppliers in terms of adherence to national and international legal rules, industry-specific regulations, as well as compliance and audit processes.

### 7.1. Compliance with national and international legislation

AEROTEH's suppliers are obliged to comply with all applicable laws and regulations in the jurisdictions in which they operate. This includes, but is not limited to, data protection, labor rights, PM, and anti-corruption legislation. Compliance with international law, including conventions and treaties to which the supplier's State is a party, is also essential.

### 7.2. Industry-specific regulations

Depending on the field of activity, suppliers may be subject to industry-specific regulations governing the production, quality, safety and distribution of their products or services. It is imperative that suppliers demonstrate in-depth knowledge and strict adherence to these standards, ensuring that all products and services delivered to AEROTEH S.A. meet applicable legal and quality requirements.

### 7.3. Compliance & Audit

Suppliers are committed to implementing and maintaining effective compliance management systems to ensure continued adherence to all applicable legal requirements and regulations. AEROTEH S.A. reserves the right to carry out audits, either directly or through designated third parties, to verify the supplier's compliance with applicable legislation and industry standards.

### 7.4. List of legislative documents

At the time of drafting this document, a number of legislative acts and regulations constitute the legal basis for the operations of AEROTEH S.A. and its partners. This list includes, but is not limited to, the GDPR for data protection, national labor laws, occupational safety and health rules, as well as specific legislation on PM and EA.

#### 7.4.1. Environmental Legislation and Regulations

- **Directive 2000/60/EC** (Water Framework Directive) - establishes a framework for the protection of surface water, groundwater, transitional water and coastal waters.
- **Regulation (EC) No 1907/2006** (REACH) - on the Registration, Evaluation, Authorization and Restriction of Chemicals.
- **Directive 2008/98/EC** (Waste Framework Directive) - lays down principles for waste management, promoting waste prevention and recycling.
- **Order no. 462/1993** for the approval of the Technical Conditions for the Protection of the Atmosphere and the Methodological Norms for the determination of

emissions of air pollutants produced by stationary sources - Ministry of Water, Forests and Environmental Protection;

- **Law no. 360/2003** on the regime of dangerous chemical substances and preparations - Parliament of Romania;
- **Emergency Ordinance no. 195/2005** on environmental protection - Government of Romania;
- **Law no. 265/2006** for the approval of the Government Emergency Ordinance no. 195/2005 on environmental protection - Parliament of Romania;
- **Emergency Ordinance no. 57/2007** regarding the regime of protected natural areas, conservation of natural habitats, wild flora and fauna - Government of Romania;
- **Law no. 104/2011** on ambient air quality - Parliament of Romania;
- **Law no. 187/2012** for the implementation of Law no. 286/2009 on the Criminal Code - Parliament of Romania;
- **Law no. 278/2013** on industrial emissions - Parliament of Romania;
- **Emergency Ordinance no. 5/2015** on waste electrical and electronic equipment - Government of Romania;
- **Law no. 249/2015** on the management of packaging and packaging waste - Parliament of Romania;
- **Emergency Ordinance no. 74/2018** amending and supplementing Law no. 211/2011 on the waste regime, Law no. 249/2015 on the management of packaging and packaging waste and Government Emergency Ordinance no. 196/2005 on the Environment Fund - Government of Romania;
- **Law no. 219/2019** amending and supplementing Article 16 of the Government Emergency Ordinance no. 195/2005 on environmental protection - Parliament of Romania;
- **The procedure** for establishing the registration, reporting, frequency of reporting to the National Register of Producers, as well as the manner of recording and reporting the information provided for in art. 9 para. (4) and art. 27 para. (6) of the Government Emergency Ordinance no. 5/2015 on waste electrical and electronic equipment, of 20.03.2019 - Ministry of Environment;
- **Law no. 123/2020** amending and supplementing the Government Emergency Ordinance no. 195/2005 on environmental protection - Parliament of Romania;
- **Emergency Ordinance no. 92/2021** on the waste regime - Government of Romania;
- **Emergency Ordinance no. 114/2023** for amending and supplementing the Government Emergency Ordinance no. 92/2021 on the waste regime - Government of Romania;
- **Law no. 17/2023** for the approval of the Government Emergency Ordinance no. 92/2021 on the waste regime - Parliament of Romania;

#### **7.4.2. Labor and Human Rights Legislation and Regulations**

- **ILO International Conventions** - on workers' rights, including the prohibition of forced and child labor, freedom of association and the right to collective bargaining.
- **The Universal Declaration of Human Rights** - which includes fundamental rights applicable in the context of work.
- **Law no. 53/2003** - Romanian Labor Code, which regulates labor relations, including working conditions, working hours, holidays and job security;
- **Law no. 319/2006** on safety and health at work - Parliament of Romania;
- **Law no. 361/2022** on the protection of whistleblowers in the public interest - Parliament of Romania;

### 7.4.3. Legislation and regulations in business ethics

- **Regulation (EU) 2016/679** (General Data Protection Regulation - GDPR) - on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.
- **Law no. 656/2002** for the prevention and sanctioning of money laundering, as well as for the establishment of measures to prevent and combat the financing of terrorism.
- **Law no. 297/2004** on the capital market, including provisions on transparency, prevention of conflicts of interest and investor protection.
- **Directive (EU) 2014/95** on the disclosure of non-financial and diversity information by certain large undertakings and groups.
- **Law no. 319/2006** on safety and health at work - Parliament of Romania

### 7.4.4. Legislation and regulations in Sustainable Procurement

- **Directive 2014/24/EU** on public procurement, which encourages the inclusion of environmental and social criteria in the public procurement process.
- **Law no. 98/2016** on public procurement in Romania, which transposes European directives and promotes the principles of energy efficiency, environmental protection and social responsibility.

It is understandable that this list is not exhaustive and will undergo regular updates to reflect legislative changes. Suppliers are responsible for staying informed and complying not only with existing legislation at the time of signing the contract or receiving the order, but also with any changes or new laws that may arise later.

By strictly complying with these obligations, AEROTEH S.A.'s suppliers contribute to supporting an ethical, responsible business environment that complies with the applicable legislation, thus strengthening the strategic partnership and long-term operational integrity.



This structure aims to bring clarity and facilitate the understanding of contractual provisions and obligations. Each chapter and sub-chapter is designed to provide a clear overview of the expectations from the provider, as well as the rules of confidentiality, protection of personal data, DD, and the procedures associated with subcontracting and the involvement of third parties. It is essential that all parties involved understand and comply with these provisions in order to ensure a successful collaboration that complies with ethical and DD standards and principles.



## Annex

### Purpose of the Annex

The Annex to this Code is intended to provide a standardized, reusable tool to support dialogue, gradual alignment and continuous improvement in the field of Sustainable Procurement, within the usual limits of contractual practices.

### Rules of use and status

- a) The annex can be used as a reference in the commercial relationship or can be integrated as an annex to contracts/orders, depending on the decision of AEROTEH S.A. and the specifics of the commercial relationship.
- b) In case of inconsistency between the contract/order and the annex to this Code, the provisions of the contract/order shall prevail, unless otherwise agreed in writing by the *Parties*.
- c) The Annex does not modify the content of this Code, but operationalizes it for recurring situations (e.g.: expressing a common intention for gradual alignment).

### ***Template for a Letter of Intent – Sustainable Procurement***

(standard document, to be signed, as the case may be, between AEROTEH S.A. and its significant suppliers).

AEROTEH S.A. reaffirms its commitment to Sustainable Development and to strengthening a responsible supply chain as an integral component of how the Company secures its long-term performance, operational resilience, and stakeholder trust. In recent years, the sustainability results achieved by AEROTEH S.A. have confirmed that this strategic direction is firm and consistent, with procurement serving as a key instrument for its practical implementation in an ethical, transparent, and predictable manner.

In this context, AEROTEH S.A. seeks to increasingly collaborate with its significant suppliers who share the same principles and have embedded a Sustainable Development vision within their own organizations.

This document is principled in nature and reflects a shared, convergent intention. It does not create any new legal obligations or impose additional concrete measures beyond those already contractually agreed, but aims, over time and through gradual evolution, to build a meaningful supplier base aligned with AEROTEH's Sustainable Development strategy.

By signing this letter, [SUPPLIER NAME] acknowledges the importance of sustainability criteria in its commercial relationship with AEROTEH S.A. and expresses its commitment to progressively strengthen its internal practices, in a manner proportionate to the nature and scale of its activities, in alignment with modern industrial supply chain expectations and recognized ESG/CSR assessment frameworks.

The first direction focuses on gaining knowledge and understanding of the environmental footprint associated with our own operations and, where relevant, with significant elements of our supply chain. This intention, in line with established best practices, seeks to build an informed baseline that enables better decision-making regarding resource consumption, waste, emissions, and inefficiencies, without

imposing a single mandatory standard or fixed timeline, but rather promoting a credible and progressive approach over time.

The second direction concerns the identification and implementation of reasonable improvement levers, tailored to the nature of the goods and/or services supplied to AEROTEH S.A., with a focus on resource efficiency, pollution prevention, responsible waste management and, where applicable, emission reduction or transport optimization.

The third direction aims to strengthen an internal Sustainable Development trajectory, which also includes the social and governance dimension: respect for human rights and labor standards, occupational health and safety, business ethics, prevention of conflicts of interest and data protection/privacy.

The Parties acknowledge the value of the AEROTEH S.A. Supplier Code of Conduct as a common reference framework of principles and standards. In this respect, AEROTEH S.A. welcomes the integration of the Code of Conduct as an annex to, or by reference in, the contracts and/or commercial orders between the Parties, in order to ensure that the framework of the relationship remains coherent, clear and practicable, within the customary limits of contractual practice.

This Letter expresses the Parties' shared intention to strengthen their partnership within a Sustainable Development framework, acknowledging that market dynamics and stakeholder expectations continue to evolve, and that Sustainable Development criteria will naturally become increasingly relevant in the selection and continuation of commercial relationships.

AEROTEH S.A. and [SUPPLIER NAME] express their willingness to engage in a constructive dialogue and to mutually encourage progressive alignment with these directions, while confirming that Sustainable Procurement constitutes a long-term, systematic and results-oriented commitment for both Parties.

\*  
\* \*



# Sustainable Development

For the Future of the Planet.



**Code of Conduct for Suppliers of AEROTEH S.A.**  
edited by the Sustainable Development Department of  
AEROTEH S.A. Bucharest, Romania  
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