

The background of the cover is a vibrant, isometric illustration of a modern industrial and technological environment. It features various pieces of machinery, control panels, and data visualization elements like charts and graphs, all rendered in shades of blue, green, and white. The overall aesthetic is clean and futuristic, representing a high-tech manufacturing or service industry.

**AEROTEH S.A.**

**Bucharest  
Romania**

**2024**

**CODE OF CONDUCT  
FOR SUPPLIERS**



# Contents

- Contents ..... 3
- 1. Introduction..... 5
  - 1.1. Purpose of the Code of Conduct for AEROTEH S.A. Suppliers .....5
  - 1.2. Scope..... 5
  - 1.3. Commitment of AEROTEH S.A. and its Suppliers for the Principles of Sustainable Development ..... 5
- 2. Definitions..... 6
  - 2.1 Relevant Terms ..... 6
  - 2.2 Applicability of Terms ..... 7
- 3. General Principles ..... 7
  - 3.1. Compliance with Laws ..... 7
  - 3.2. Integrity and Ethics in Business ..... 7
  - 3.3. Conflicts of Interest ..... 7
- 4. Sustainable Development..... 8
  - 4.1. Principles of Sustainable Development..... 8
  - 4.2 Environmental Protection ..... 8
    - 4.2.1. Basic Principles ..... 8
    - 4.2.2. Waste Management and Recycling..... 8
    - 4.2.3. Emission Reduction, Pollution Prevention and Resource Conservation ..... 9
    - 4.2.4. Innovation and Sustainable Development..... 9
  - 4.3. Labour and Human Rights ..... 10
    - 4.3.1. Respect for Fundamental Human Rights..... 10
    - 4.3.2. Working Conditions and Employee Security..... 10
    - 4.3.3. Prohibition of Forced Labour and Child Labour..... 10
    - 4.3.4. Equal Opportunities and Non-discrimination..... 10
    - 4.3.5. Freedom of Association and Right to Collective Bargaining ..... 11
    - 4.3.6. Occupational Safety and Health (OSH)..... 11
  - 4.4 Business Ethics..... 12
  - 4.5 Sustainable Supply ..... 12
- 5. Confidentiality and Personal Data Protection ..... 13
  - 5.1. Information Confidentiality ..... 13
    - 5.1.1. General Provisions ..... 13
    - 5.1.2. Duty of Confidentiality..... 14

5.1.3. Specific Responsibilities .....	14
5.1.4. Sanctions .....	14
5.1.5. Exceptions and Consequences.....	14
5.1.6. Sanctions for Violation .....	14
5.2. Importance of Ensuring Personal Data Protection .....	15
5.2.1. Compliance with the General Data Protection Regulation (GDPR) .....	15
5.2.2. Essential Responsibilities: .....	15
5.2.3. Data Processing and Disclosure: Framework and Procedures .....	15
5.2.4. IT Security and Protection against Data Leakage.....	16
6. Subcontracting and Third Party Supporting Entities.....	17
6.1. Subcontracting Procedures .....	17
6.2. Obligations of the Supplier in the Subcontracting Process .....	17
6.3. Specific Subcontracting Procedures.....	17
6.4. Third Party Supporting Entities.....	18
6.4.1. Definition of Third Party Supporting Entities .....	18
6.4.2. Rules for Engaging Third Party Supporting Entities .....	18
6.4.3. Responsibilities of Third Party Supporting Entities .....	18
6.4.4. Monitoring and Evaluation .....	18
7. Applicable Law .....	19
7.1. Compliance with National and International Laws.....	19
7.2. Industry Specific Regulations .....	19
7.3. Compliance and Auditing.....	19
7.4. List of Legislative Documents.....	19
7.4.1. Laws and Regulations on Environmental Protection .....	19
7.4.2. Laws and Regulations on Labour and Human Rights .....	20
7.4.3. Laws and Regulations on Business Ethics .....	20
7.4.4. Laws and Regulations on Sustainable Supply .....	21



# **CODE OF CONDUCT**

## **for AEROTEH S.A. Suppliers**

### **1. Introduction**

#### ***1.1. Purpose of the Code of Conduct for AEROTEH S.A. Suppliers***

The Code of Conduct for AEROTEH S.A. Suppliers is designed to establish a clear set of ethical principles and standards that we expect from all our suppliers. The purpose of this code is to ensure that all activities carried out within our supply chain reflect our ongoing commitment to integrity, respect for human rights, environmental protection and the promotion of responsible business practices. This code serves as a basis for building and maintaining a relationship of trust and mutual respect between AEROTEH S.A. and its business partners.

#### ***1.2. Scope***

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



***AEROTEH S.A. reserves the right to check suppliers' compliance with the provisions of this code and to take appropriate measures in the event of any deviations being identified.***

#### ***1.3. Commitment of AEROTEH S.A. and its Suppliers for the Principles of Sustainable Development***

AEROTEH S.A. and its suppliers share a firm commitment to promoting and observing 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 of all employees and contribute to the well-being of the communities in which we operate. We are committed to working together to identify and implement innovative solutions that promote resource efficiency, reduce carbon emissions and increase long-term sustainability in our supply chain. Through collaboration and constant dialogue, AEROTEH S.A. and its suppliers aim at setting new standards of excellence in corporate responsibility and sustainable development.

## 2. Definitions

### 2.1 Relevant Terms

The general and specific terms, as defined below, play a crucial role in the understanding and application of 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 under the contract or order, which requests the supply of equipment and the provision of services.
- **Supplier:** The entity that, having a contractual relationship on an order basis 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 fulfilling the contract or order.

#### Specific terms:

- **Equipment:** All physical assets, including machines, tools and devices, specified in the contract, which must meet agreed technical standards and be fit for their intended use.
- **Services:** The set of activities related to the equipment delivery process, including but not limited to shipping, insurance, installation and technical support, necessary for the proper functioning of the equipment.
- **Standards:** The set of rules and technical requirements, regulations and applicable laws that govern the quality and performance of equipment and services provided.
- **Origin:** The place of production or manufacture of equipment, defined by the significant transformation of raw materials into a distinct finished product.
- **Force majeure:** External events, unpredictable and independent of the will of the parties, which prevent the fulfilment of contractual obligations, including natural disasters, armed conflicts and other legally recognized force majeure situations.
- **Day:** A unit of time of 24 hours, recognized regardless of the day of the week.
- **Year:** The calendar period of 365 or 366 days, according to the Gregorian calendar.
- **Confidential information:** All data and information, regardless of the form of presentation, relevant for the execution of the contract and which are exchanged between the parties in the performance of contractual obligations.
- **Documents:** Any informative material, including the technical and administrative documentation necessary to fulfil the contractual provisions.
- **Latent defect:** Defects in equipment or services, not apparent on standard inspection, which may affect their functionality or performance.
- **Occupational safety and health:** The set of measures and procedures implemented to ensure the safety and health of employees during the execution of the contract/order.
- **Protocol (PT):** Official recording of findings and agreements between parties regarding acceptance of equipment or completion of contractual stages.

## **2.2 Applicability of Terms**

The previously defined terms are applicable for the entire duration of the contract/order between AEROTEH S.A. and the supplier, ensuring a common basis of understanding and reading. These terms must be observed by all parties involved for effective collaboration and for avoidance of 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 Laws**

AEROTEH S.A. suppliers are required to comply with all national and international laws, regulations and standards applicable to their business activities. This includes, but is not limited to, labour, environmental, product safety, fair competition and intellectual property laws.



***Compliance with laws is the foundation on which our operational integrity is built and is essential to maintaining a solid and trustworthy partnership with all our stakeholders.***

### **3.2. Integrity and Ethics in Business**

AEROTEH S.A. expects all its suppliers to demonstrate the highest integrity and adhere to standards of business ethics. This involves 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 core values, ensuring that all transactions and interactions are conducted in accordance with ethical principles.

### **3.3. Conflicts of Interest**

Suppliers must avoid any situation that could lead to or be perceived as a conflict of interest. This includes situations where the personal interests, direct or indirect, of the supplier's employees come into conflict with their obligations to the company or AEROTEH S.A. Suppliers must immediately inform AEROTEH S.A. about any situation that might represent a conflict of interest, ensuring that all decisions are made in the best interests of the partnership and without undue outside influence.

AEROTEH S.A. 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 activity. By adhering to these principles, AEROTEH S.A. and its business partners reaffirm their commitment to achieving high standards of performance and accountability in all their operations.

## 4. Sustainable Development

### 4.1. Principles of Sustainable Development

- **Resource efficiency:** Promotion of efficiency and reduction of resource wastage 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 minimize environmental impact.
- **Emission reduction:** Implementation of concrete measures to reduce emissions of greenhouse gases and other pollutants. Encouraging the use of renewable energy and other practices that help combat climate change.
- **Waste management:** Adoption of effective strategies for waste management, including recycling, reuse and waste reduction at source. Ensuring safe and responsible disposal of waste that cannot be recycled or reused.
- **Biodiversity conservation:** Protection of natural habitats and biodiversity, avoidance of activities that may lead to the destruction or degradation of ecosystems. Promotion of the sustainable use of natural resources and protection of threatened 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. Involvement in community projects and environmental initiatives.

#### Monitoring and reporting

- **Periodic assessments:** Carrying out periodic assessments of the impact of activities on the environment, to identify opportunities for continuous improvement and to ensure compliance with sustainable development objectives.
- **Transparent reporting:** Transparent and regular reporting of environmental performance, including the achievement of sustainability goals, environmental protection initiatives and the results of impact assessments.

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

### 4.2 Environmental Protection

Environmental protection is a central pillar in the sustainable development strategy adopted by AEROTEH S.A. and its suppliers. This subchapter details the specific measures to be implemented for pollution prevention and efficient waste management, emphasizing the firm commitment to the conservation of natural resources and the minimization of negative environmental impacts.

#### 4.2.1. Basic Principles

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

#### 4.2.2. Waste Management and Recycling

Suppliers are responsible for implementing effective waste management systems that promote the reduction, reuse and recycling of materials. This involves:



- **Waste hierarchy:** Application of the waste hierarchy principle which prioritizes the prevention of waste generation, followed by reuse, recycling, recovery and, as a last resort, disposal.
- **Selective collection systems:** Implementation and encouragement of selective collection systems for recyclable, organic and hazardous waste to facilitate their recycling and recovery.
- **Partnerships for recycling:** Collaboration with entities that offer recycling facilities and specialized organizations to ensure the efficient treatment and recycling of waste generated by the Company's activities.
- **Minimization of waste at source:** Adoption of efficient manufacturing practices that reduce the amount of waste generated, including optimization of processes and use of 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. Emission Reduction, Pollution Prevention and Resource Conservation

Suppliers must prioritize reducing greenhouse gas emissions and conserving resources by:

- **Clean technologies:** Adoption and promotion of clean, energy-efficient technologies that reduce polluting emissions and resource consumption.
- **Emissions management:** Implementation of monitoring and control systems for emissions of greenhouse gases, particles and other pollutants. Strict compliance with statutory emission limits for all activities.
- **Prevention of water pollution:** Application of pre-treatment measures for industrial wastewater before discharge into public sewerage systems or the natural environment. Implementation of water conservation and consumption reduction practices.
- **Efficient transport:** Optimization of supply chains to reduce transport distances and thereby carbon emissions.
- **Energy saving:** Promotion of energy efficiency in all production operations and processes.
- **Management of hazardous substances:** Inventory and proper management of chemicals and hazardous materials to prevent spills and contamination of soil and water.

#### 4.2.4. Innovation and Sustainable Development

AEROTEH S.A. encourages its suppliers to invest in research and development to find innovative and sustainable solutions that can reduce environmental impact. This commitment includes:

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

AEROTEH S.A. suppliers they are essential in the joint efforts to build a sustainable future. By adopting these green practices and by committing to innovation and sustainable development, suppliers contribute not only to the protection of the environment, but also to the long-term success of business partnerships.

### **4.3. Labour and Human Rights**

Responsibility towards labour and human rights is a central aspect of the cooperation between AEROTEH S.A. and its suppliers. This section outlines the specific commitments suppliers must meet to ensure an ethical and fair working environment.

#### **4.3.1. Respect for Fundamental Human Rights**

AEROTEH S.A. suppliers are required 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:** Promotion of equality and prevention of any form of discrimination based on race, colour, sex, language, religion, political opinion or any other condition.
- **Freedom of association:** Recognition of the right of workers to form and join trade unions and to participate in collective bargaining, in accordance with local laws.
- **Occupational safety and health:** Implementation of occupational safety and health measures, including adequate employee training and provision of personal protective equipment, to create a safe work environment for all employees.
- **Combating harassment and abuse:** Creation of 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 occupational accidents, providing adequate protective equipment and training employees in safe work practices.

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

- **Compliance with laws:** Suppliers and subcontractors are required to comply with all applicable labour laws and regulations in the jurisdictions in which they operate. This includes laws on pay, working hours, holidays and workplace safety.
- **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 Labour and Child Labour**

AEROTEH S.A. and its suppliers condemn any form of forced or child labour in all activities and supply chain. Suppliers must ensure that all employees are hired on the basis of free and informed consent, without being subjected to intimidation, threats or any other form of coercion. Employment of minors must comply with the legal minimum employment age and not interfere with their education.

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

#### **4.3.4. Equal Opportunities and Non-discrimination**

Suppliers must promote a working environment that respects the principle of equal opportunities and is free from any form of discrimination, whether it is about race, colour, sex, religion, sexual orientation, age, national or social status, or disability.

Hiring and promotion decisions must be based solely on qualifications, competencies and performance.

#### **4.3.5. Freedom of Association and Right to Collective Bargaining**

Suppliers must recognize and respect employees' right to form and join unions and bargain collectively without retaliation, interference or intimidation. It is essential to ensure open and constructive dialogue between employers and employee representatives to promote harmonious labour relations.

By complying with these principles, AEROTEH S.A.'s suppliers contribute to the promotion of an ethical and responsible supply chain that protects and improves working conditions and employee 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 Safety and Health (OSH)**

Occupational safety and health are essential aspects of a responsible and sustainable working environment. AEROTEH S.A. and its suppliers are committed to providing a safe and healthy workplace for all employees, subcontractors and third parties involved in their operations. This subchapter details the supplier's obligations regarding 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 relevant national laws and international standards. These policies must cover all aspects of occupational injuries and disease prevention.
- **Training and awareness:** Ensuring adequate training for all employees on correct OSH practices, use of personal protective equipment, emergency procedures and handling of hazardous substances.
- **Risk assessment:** Conducting regular workplace risk assessments to identify potential hazards and implement appropriate preventive measures.
- **Monitoring and review:** Continuous monitoring of working conditions and periodic 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 their correct labelling according to the regulations in force.
- **Safety data sheets:** 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:** Provision of specific training for employees who handle or are exposed to hazardous substances, training which must include information about potential risks and appropriate protective measures.
- **Storage and handling:** Implementation of safe storage and handling procedures for hazardous substances to prevent accidents and unauthorized exposures.
- **Contingency plans:** Development and implementation of emergency plans to effectively respond to hazardous substance incidents, including spills, fires, or other emergencies.

By fulfilling these obligations, suppliers and subcontractors must align with AEROTEH S.A.'s commitment to promote a safe and healthy working 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 laws, but also commitment to the core values of corporate sustainability and responsibility.

## **4.4 Business Ethics**

Business ethics is 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 undertake to uphold in all their interactions and transactions.

### **Fundamental ethical commitments**

- **Integrity and honesty:** All parties undertake to act with integrity and honesty in all aspects of their business, avoiding any form of deceptive or fraudulent behaviour.
- **Transparency:** Promotion of 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:** Identification and appropriate management of any conflict of interest that could affect decisions and actions within the business relationship. Parties are required to disclose any potential conflict of interest.
- **Intellectual property protection:** Compliance with intellectual property rights and ensuring that all transactions and uses of protected material are conducted in accordance with applicable laws.
- **Fight against corruption:** Adoption of strict policies against corruption, bribery and any other forms of undue influence. Implementation of preventive measures and reporting mechanisms to combat these practices.

### **Specific implementation measures**

- **Code of conduct:** Development and implementation of a code of ethical conduct to serve as guideline for the business conduct of employees and contractual parties.
- **Training and education:** Provision of training programmes for employees and business partners to ensure understanding and adherence to established ethical standards.
- **Reporting mechanisms:** Implementation of open and anonymous channels for reporting ethical violations, ensuring the protection of whistle-blowers and taking all complaints and reporting seriously.
- **Ethics audits and evaluations:** Carrying out 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 commitment to promoting a culture of business ethics, 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 Supply**

Sustainable supply is a key element in the sustainable development strategy of AEROTEH S.A., reflecting the commitment to integrate social, environmental and ethical considerations in the process of selection and evaluation of suppliers and subcontractors. This subchapter details the criteria and procedures by which AEROTEH S.A. ensures that its business partners share the same values and commitments to sustainability.

### **Selection criteria**

- **Compliance with environmental standards:** Assessing suppliers' commitment to environmental protection, including managing resources, reducing carbon emissions and minimizing the impact of operations on the environment.
- **Ethical work practices:** Verification whether suppliers respect workers' fundamental rights, including safe and fair working conditions, the absence of forced or child labour and the right to freedom of association.
- **Social responsibility:** Assessment of the involvement of suppliers 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, their production processes and their supply chain.

### **Evaluation procedures**

- **Audits and inspections:** Carrying out regular audits and inspections at the premises of suppliers and subcontractors to verify compliance with sustainability criteria and business ethics.
- **Risk assessments:** Implementation of a risk assessment process to identify potential sustainability and ethical issues in the supply chain and develop action plans to mitigate them.
- **Sustainable certifications:** Encouragement and preference for suppliers holding internationally recognized sustainability certifications such as ISO 14001 for environmental management or SA8000 for social practices.
- **Long-term commitments:** Development of long-term relationships with suppliers who demonstrate an ongoing commitment to the principles of sustainable development and the continuous improvement of their environmental and social performance.

### **Continuous monitoring and improvement**

- **Feedback and dialogue:** Establishment of a constructive dialogue with suppliers to discuss evaluation results and identify opportunities to improve sustainability practices.
- **Training programmes:** Provision of training programmes and technical assistance for suppliers and subcontractors who require support to meet AEROTEH S.A.'s sustainability standards.
- **Regular evaluations:** Conduct of periodic performance evaluations of suppliers and subcontractors to ensure they continue to meet sustainability and business ethics criteria.

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

## **5. Confidentiality and Personal Data Protection**

### **5.1. Information Confidentiality**

#### **5.1.1. General Provisions**

The contractual relationship between AEROTEH S.A. and its partners, including suppliers, subcontractors and third party supporting entities, is based on strict confidentiality compliance. These provisions ensure the protection of data and information exchanged or created during the fulfilment of the contract, essential to protect the activities, strategies and commercial interests of all parties involved.

### 5.1.2. Duty of Confidentiality

- **Duration of the obligation:** This obligation persists for the entire duration of the contract and continues for a period of two years after its termination or expiration, covering all types of information communicated, regardless of the method of transmission or marking as confidential.
- **Scope:** The duty of confidentiality extends equally to all involved participants, including subcontractors and third party supporting entities. The supplier must ensure the compliance of its entire network, ensuring that confidentiality standards are consistently met.

### 5.1.3. Specific Responsibilities

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

### 5.1.4. Sanctions

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

### 5.1.5. Exceptions and Consequences

#### Exceptions to the duty of confidentiality

- **Agreement of the parties:** Disclosure is permitted with the written consent of the other party.
- **Legal obligations:** Disclosures required by law are acceptable provided prior notice is given and limited to strictly necessary information.
- **Public information:** Information already publicly available or independently developed is not subject to confidentiality restrictions.

### 5.1.6. Sanctions for Violation

- **Compensation for damages:** Breach of confidentiality clauses may require the payment of damages, 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.
- **Contract termination:** Serious violations may warrant unilateral termination of the agreement, opening the way for further legal action.
- **Preventive measures:** The prejudiced party may seek legal action to prevent further disclosures and to protect its interests.

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

## **5.2. Importance of Ensuring Personal Data Protection**

### **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, protecting personal data has become a central pillar of individual privacy and security. The RGPD imposes a harmonized legislative framework in the European Union, dedicated to safeguarding the fundamental rights of individuals, with a special emphasis on personal data protection. For AEROTEH S.A. and its suppliers, compliance with the GDPR and the corresponding national laws is a sine qua non requirement.

### **5.2.2. Essential Responsibilities:**

- **Adoption of GDPR principles:** It is imperative that all entities involved in the processing of personal data adhere to the core principles of the GDPR - legality, transparency, purpose limitation, data minimization, accuracy, integrity and data confidentiality, all under the umbrella of accountability.
- **Guaranteeing the rights of data subjects:** Data subjects benefit from extensive rights such as access, rectification, deletion, restriction of processing, data portability and the right not to be subject to automated decision-making. AEROTEH S.A. suppliers must ensure the effective exercise of these rights.
- **Implementation of security measures:** It is essential to adopt appropriate technical and organizational measures to ensure an appropriate level of security, protecting data against unauthorized access, illegal processing, accidental loss or destruction.
- **Security incident management:** Any breach of data security that poses risks to individual rights and freedoms requires prompt notification of supervisory authorities and, where applicable, affected data subjects.
- **Vigilance in the selection of subcontractors:** Suppliers must ensure that any third party involved in processing data on their behalf complies with GDPR obligations, 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 conducted legally and transparently, with a clearly defined foundation and strictly limited to contractual and legal requirements.
- **Use of data:** Clear and precise information to data subjects about the use of their data, guaranteeing transparency and limiting access to data to authorized personnel only.
- **Disclosure of data:** Any transfer of personal data to third parties is subject to strict control, respecting the consent of the data subject or applicable legal provisions, and is protected by confidentiality agreements with clauses dedicated to data protection.
- **Data security:** Adopting robust security measures is crucial to protecting data against 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 protecting privacy and personal data, while respecting the rigours of the laws 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. IT Security and Protection against Data Leakage**

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 outlines the essential responsibilities of the suppliers with whom AEROTEH S.A. collaborates to ensure a safe and resilient digital environment.

##### **Fundamental responsibilities of suppliers**

- **Implementation of advanced security measures:** Suppliers are required to adopt the latest security technologies and protocols to protect networks, systems and data against cyber-attacks, malware and other IT threats. This includes firewalls, intrusion detection and prevention systems, in transit and stationary data encryption, and multifactor authentication.
- **Regular assessment of vulnerabilities:** 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 specialized third parties to ensure the objectivity and exhaustiveness of the analysis.
- **Employee training and awareness:** A crucial element in the prevention of data leaks is the continuous training of the employees of the suppliers on the best practices of IT security. This includes regular training on how to recognize and report phishing attempts, secure password management and compliance with security policies.
- **Security incident management:** Suppliers must have clear and effective procedures for detecting, reporting and managing security incidents. This implies the rapid notification of AEROTEH S.A. in the event of security breaches, cooperating in investigations and implementing remedial measures to limit the impact.
- **Data access control:** Access to data and systems must be strictly controlled and limited on a need-to-know basis. Suppliers must use access control policies, segregation of duties and access audits to prevent unauthorized access or unintended disclosure of data.
- **Review and update of security policies:** Security policies and procedures should be reviewed and updated regularly to reflect evolving cyber threats and changes in technology. Suppliers must collaborate with AEROTEH S.A. to ensure their policies align with best practice and regulations in force.
- **Compliance with regulations:** Suppliers are responsible for compliance with all relevant data security and information protection laws and regulations, including industry-specific standards and contractual requirements established by AEROTEH S.A.

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



## 6. Subcontracting and Third Party Supporting Entities

### 6.1. Subcontracting Procedures

Subcontracting is an essential element in AEROTEH S.A.'s operations, allowing access to specialized expertise and additional capacity when needed. To ensure that all subcontracted activities meet the Company's high standards, AEROTEH S.A. sets out clear obligations and procedures for suppliers who choose to subcontract part of their contractual obligations.

### 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 perform a rigorous evaluation of potential subcontractors, ensuring that they meet AEROTEH S.A. standards in terms of quality, business ethics, 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 ongoing monitoring of subcontractor performance, including compliance with project plans, deadlines, and quality standards.
- **Compliance with laws and regulations:** Making sure that subcontractors comply with all applicable laws and regulations, including occupational safety and health, environmental protection and workers' rights.

### 6.3. Specific Subcontracting Procedures

- **Preselection documentation:** Suppliers must prepare and submit to AEROTEH S.A. the documentation required 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 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 work practices and ensure that subcontractor personnel are well informed of project requirements.
- **Liability and insurance:** Suppliers must ensure that subcontractors hold adequate insurance to cover any potential risk or damage that may arise from their activities.
- **Periodic evaluations and feedback:** Conduct of periodic evaluations of subcontractors and provision of constructive feedback to encourage 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 supply chain.

## **6.4. Third Party Supporting Entities**

In the extended context of the activities of AEROTEH S.A. and its contractual relationships, the involvement of third party supporting entities plays a critical role in meeting project and operational objectives. This subchapter establishes the specific rules by which the suppliers of AEROTEH S.A. must govern the engagement and responsibilities of third party supporting entities, thus ensuring alignment with Company standards and legal and ethical requirements.

### **6.4.1. Definition of Third Party Supporting Entities**

Third party supporting entities include any entities or natural persons who provide support and resources to the main supplier in fulfilling the contractual obligations towards AEROTEH S.A., without being a direct party to the main contract. This support may include specialized services, provision of resources, consulting or any other type of assistance required.

### **6.4.2. Rules for Engaging Third Party Supporting Entities**

- **Prior approval:** Suppliers must obtain written approval from AEROTEH S.A. before involving any third party supporting entities in the project. This involves presenting details of third parties' competencies and experience, as well as justifying the need for their involvement.
- **Compliance assessment:** Third party supporting entities must be assessed to ensure compliance with environmental, business ethics, occupational safety and health standards and any other specific requirements established by AEROTEH S.A.
- **Contractual agreements:** Relations with third party supporting entities must be made official through a contractual agreement that includes specific clauses regarding compliance with applicable laws, labour protection standards, human rights and sustainability principles.

### **6.4.3. Responsibilities of Third Party Supporting Entities**

- **Legal and ethical compliance:** Third party supporting entities are required to comply with all applicable laws and regulations in their field of activity, as well as to adhere to the ethical and business principles promoted by AEROTEH S.A.
- **Reporting and transparency:** Third party supporting entities must provide regular reports on the progress and compliance of their activities, ensuring a high level of transparency and enabling effective monitoring of their performance.
- **Risk management:** Proactive identification and management of any risks that could affect the fulfilment of contractual obligations or the reputation of AEROTEH S.A., including environmental, social and governance (ESG) risks.

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

- **Continuous supervision:** AEROTEH S.A. and its suppliers must continuously monitor the performance and compliance of third party supporting entities using audits, on-site inspections and other evaluation methods.
- **Feedback and continuous improvement:** Third party supporting entities must be responsive to feedback and collaborate with AEROTEH S.A. and its suppliers to implement continuous improvements in work practices and processes.

By establishing clear rules for the involvement and management of third party supporting entities, AEROTEH S.A. ensures that its entire supply chain and extended collaborations are aligned with its sustainability, ethics and compliance commitments, thereby contributing to the achievement of its 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 applicable laws is fundamental. This chapter details suppliers' obligations regarding adherence to national and international legal norms, industry-specific regulations, as well as compliance and auditing processes.

### **7.1. Compliance with National and International Laws**

AEROTEH S.A. suppliers are required to comply with all applicable laws and regulations in the jurisdictions in which they operate. This includes, but is not limited to, data protection, labour rights, environmental protection and anti-corruption laws. 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 a thorough 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 and Auditing**

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

### **7.4. List of Legislative Documents**

At the time of drafting this document, a series 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 labour laws, occupational safety and health regulations, as well as specific laws on environmental protection and business ethics.

#### **7.4.1. Laws and Regulations on Environmental Protection**

- **Directive 2000/60/EC** (Water Framework Directive) - establishes a framework for the protection of surface water, groundwater, transitional waters and coastal waters.
- **Regulation (EC) No. 1907/2006** (REACH) - on the registration, evaluation, authorization and restriction of chemical substances.
- **Directive 2008/98/EC** (Waste Framework Directive) - establishes principles for waste management, promoting waste generation prevention and recycling.
- **Order no. 462/1993** for the approval of the Technical Conditions on the protection of the atmosphere and the Methodological Norms on the determination of the emissions of atmospheric 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** on the regime of natural protected areas, conservation of natural habitats, flora and fauna - Romanian Government;
- **Law no. 104/2011** on the quality of the surrounding air - 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 electrical and electronic equipment waste - Romanian Government;
- **Law no. 249/2015** on the management of packaging and packaging waste - Parliament of Romania;
- **Emergency Ordinance no. 74/2018** for the amendment and completion of Law no. 211/2011 on the waste regime, of Law no. 249/2015 on the method of managing packaging and packaging waste and Government Emergency Ordinance no. 196/2005 on the Environmental Fund - Romanian Government;
- **Law no. 219/2019** for the amendment and completion of art. 16 of the Government Emergency Ordinance no. 195/2005 on environmental protection - Parliament of Romania;
- **Procedure** for establishing the registration, reporting, frequency of reporting to the National Producer Registry, as well as the way of recording and reporting the information provided for in art. 9 para. (4) and in art. 27 para. (6) of the Government Emergency Ordinance no. 5/2015 on electrical and electronic equipment waste, of 20.03.2019 - Ministry of the Environment;
- **Law no. 123/2020** for the amendment and completion of the Government Emergency Ordinance no. 195/2005 on environmental protection - Parliament of Romania;
- **Emergency Ordinance no. 92/2021** on the waste regime - Romanian Government;
- **Emergency Ordinance no. 114/2023** for the amendment and completion of the Government Emergency Ordinance no. 92/2021 on the waste regime - Romanian Government;
- **Law no. 17/2023** for the approval of Government Emergency Ordinance no. 92/2021 on the waste regime - Parliament of Romania;

#### **7.4.2. Laws and Regulations on Labour and Human Rights**

- **ILO (International Labour Organization) International Conventions** - on workers' rights, including the prohibition of forced and child labour, freedom of association and the right to collective bargaining.
- **Universal Declaration of Human Rights** - which includes fundamental rights applicable in the context of labour.
- **Law no. 53/2003** - The Romanian Labour Code, which regulates labour relations, including working conditions, working hours, holidays and workplace safety.
- **Law no. 319/2006** on occupational safety and health - Parliament of Romania
- **Law no. 361/2022** on the protection of whistle-blowers in the public interest - Parliament of Romania;

#### **7.4.3. Laws and Regulations on 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 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** as regards disclosure of non-financial and diversity information by certain large companies and groups.
- **Law no. 319/2006** on occupational safety and health - Parliament of Romania

#### **7.4.4. Laws and Regulations on Sustainable Supply**

- **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 should be understood that this list is not exhaustive and will undergo periodic updates to reflect legislative changes. Suppliers are responsible for staying informed and complying not only with existing laws at the time of signing the contract or receiving the order, but also with any changes or new laws that may arise subsequently.

By strictly complying with these obligations, the suppliers of AEROTEH S.A. contribute to supporting an ethical, responsible and compliant business environment, thus strengthening the strategic partnership and long-term operational integrity.

\*  
\* \*

This structure aims at bringing clarity and facilitating understanding of contractual provisions and obligations. Each chapter and subchapter is designed to provide a clear overview of the expectations from the supplier, as well as the rules of confidentiality, personal data protection, sustainable development, and the procedures associated with subcontracting and third-party involvement. It is essential that all parties involved understand and comply with these provisions to ensure a successful collaboration that complies with ethical and sustainable development standards and principles.

