

JSC “BAA TRAINING”

**SUPPLIER CODE
OF CONDUCT (SCOC)**

JSC “BAA Training” - an approved training organization providing full-scope of flight crew training solutions: ab Initio school, type rating and other aviation trainings across the world.

As an organization, we are committed to making a positive impact on the world by actively minimizing its environmental footprint, ensuring a safe, inclusive, and engaging working environment, supporting the communities in which it operates, and adhering to trusted, transparent, and compliant business practices.

Our collective goal, in collaboration with our stakeholders, is to contribute to a more sustainable, responsible, and inclusive aviation industry. To achieve this, we place significant importance on our suppliers and have established a Sustainable Procurement strategy based on the Supplier Code of Conduct (SCoC), aligned with our overall Environmental, Social, and Governance strategy.

This Code is based on our corporate values and adheres to the principles of the United Nations Global Compact.

The SCoC reflects our corporate values and adheres to the principles of the United Nations Global Compact, which sets out the essential requirements expected from our suppliers in accordance with internationally recognized standards and conventions.

We hold all our suppliers, including subcontractors who conduct business with the company to the same high standards of responsible business practices and ethical behavior. Regardless of their location, all business activities should be conducted in full compliance with the SCoC.

We anticipate that you will integrate these principles throughout your supply chain and demonstrate exemplary practices in social and environmental responsibility, as well as business ethics. For this purpose, the company has produced this Supplier Code of Conduct (SCoC), which sets the minimum standards for doing business with any Group company or Business Unit.

By working together, we aim to create a more sustainable, responsible, and inclusive aviation industry.



Compliance with laws

All Suppliers must comply with all laws and regulations applicable to their business, including the local laws and regulations of all countries in which operations are managed or services are provided. The supplier shall support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights, the UN Principles on Business and Human Rights.



Human rights

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

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

Child Labor

We expect Suppliers to ensure that illegal child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed, and/or the minimum working age defined by the International Labor Organization (ILO), whichever is higher.

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

Modern Slavery including Human Trafficking, Forced, Bonded or Indentured Labor

Suppliers must prevent any involvement in all forms of modern slavery, including human trafficking, forced, bonded or indentured labor. All work should be voluntary on the part of the employee.

We expect suppliers to provide all employees with a written contract in a language they understand clearly indicating their rights and responsibilities with regard to wages, working hours, benefits and other working and employment conditions. Suppliers should not retain any form of employee identification (passports or work permits), nor destroy or deny access to such documentation, as a condition of employment unless required by applicable law.

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

Suppliers must respect the right of workers to terminate their employment after reasonable notice and to receive all owed salary. Suppliers must respect the right of workers to leave the workplace after their shift (see also Wage, Benefit, and Working Hours).



Fair labor practices

As a demonstration of our dedication to promoting sustainable and ethical approaches, we want to emphasize the importance of fair labor practices in all our endeavors. In the company, we strongly hold the belief that embracing fair labor practices is not only morally imperative but also crucial in making a positive difference in the world. Our commitment lies in ensuring that all workers engaged in our supply chain receive the utmost respect, dignity, and equitable treatment. We hold our suppliers to these same principles and expect them to uphold them as well.

Wage, Benefits and Working Hours

Suppliers are obligated to pay their workers at least the minimum compensation mandated by local law and provide all legally required benefits. Additionally, workers must be compensated for overtime at a premium rate as required by law or, in the absence of such laws, at least equal to their regular hourly payment rate. Any deduction from wages as a disciplinary measure or unauthorized deductions beyond what national law allows are not permitted. We expect suppliers to ensure that employees adhere to regulated working hours, receive daily and weekly rest periods, and are granted annual leave as legally mandated.

Social dialogue and freedom of association

We expect suppliers to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

We expect suppliers to recognize and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing within the appropriate national legal framework.

Diversity and Inclusion

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

Harassment and Bullying

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

Disciplinary and Grievance Mechanism

We expect suppliers to have an employee disciplinary process in place to address concerns regarding employee work, conduct or absence.

We expect suppliers to have a grievance mechanism for employees to raise a workplace problem or concern or to appeal a disciplinary decision.



Business Ethics & Integrity

Anti-Corruption & Anti-Bribery Laws

Suppliers must comply rigorously with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business regardless of any local customs. The supplier shall not (neither directly nor indirectly) offer, provide or accept anything of value to improperly influence an official act or to secure an improper advantage in order to obtain or retain business. This includes so-called facilitation payments or other benefits provided to public officials for routine non-discretionary actions.

We expect suppliers to conduct effective due diligence to prevent and detect bribery and corruption in all business arrangements, including partnerships, the engagement of contractors and sub-contractors, joint ventures, offset agreements, and the hiring of third-party intermediaries such as agents or consultants.

Illegal Payments and illegal financing

Suppliers must not offer any illegal payments or any illegal financing to, or agree to receive any illegal payments or any financing from, any customer, supplier, their agents, representatives or others.

We expect Suppliers to prohibit their employees from receiving, paying, and/or promising sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage. This prohibition applies even in locations where such activity may not violate local law.

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

Gifts/Business Courtesies

We expect suppliers to compete on the merits of their products and services. Suppliers must not use the exchange of business courtesies to gain an unfair competitive advantage. In any business relationship, suppliers

must ensure that the offering or receipt of any gift or business courtesy is permitted by applicable laws and regulations, and that these exchanges do not violate the rules and standards of the company and are consistent with reasonable marketplace customs and practices. No cash gifts or cash equivalents should be offered or accepted.

Fraud and Deception

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

Conflict of Interest

We expect suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Suppliers will provide immediate notification to all affected parties in the event that an actual or potential conflict of interest arises.

Competition and Antitrust

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



Health & Safety

We expect suppliers to establish an appropriate safety management system including policies aimed at protecting the health, safety, and welfare of employees, contractors, visitors, and others who may be affected by their activities by striving to eliminate fatalities, work-related injuries, health impairment, and limiting exposure to safety hazards.

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

The supplier is responsible for the safety and health of the employees assigned to the service.

Environment

Environmental management system

We expect suppliers to conduct their business in a manner that actively manages environmental risks across their operations, products and supply chain.

Suppliers shall establish an appropriate environment management system, including policies and procedures to effectively manage their environmental performance, which includes:

- Compliance with all applicable laws, regulations and other environmental requirements related to their operations.
- Commitment to continual improvement through setting and monitoring environmental objectives and targets, tracking performance, and implementing corrective actions where necessary.
- Commitment to ensuring that their employees have the knowledge, skills, and resources necessary to carry out their duties in an environmentally responsible manner.
- Regular transparent communication of their environmental performance and initiatives to stakeholders.
- Collaboration with the company to promote general environmental awareness where necessary.

Substances and chemical management

We expect suppliers to communicate to the company up to date information in regard to environmental, health, and safety (EHS) matters of their products to enable safe usage of the products in the whole life cycle.

Suppliers are further expected to cooperate with the company to enable downstream requirements in relation to suppliers' products and/or services to be fulfilled.

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

Products or parts purchased from supplier by the company, must comply with the laws or regulations applicable in the country of manufacturing but also in the countries of marketing or use of these supplies, products, or parts in terms of prohibition, restriction of use, or traceability of substances of concern for the protection of health and environment.

Sustainable product and process development

Suppliers shall make every effort to conduct their operations in a manner that contributes to the company environmental goal, focusing on reducing the potential and actual negative impact on the environment in the short, medium and long term for further sustainable growth.

In particular, they must:

- Strive to deploy a strategy that makes energy consumption cleaner and more efficient by minimizing greenhouse gas emissions and reducing their impact on climate change;
- Conserves natural resources, including energy sources, water, and virgin raw materials and promotes valorization and recycling of materials;
- Ensure that their goods, works or services do not have a negative/ detrimental impact on biodiversity;

And, more generally, implement all protective measures to prevent any potential risk of damage to the environment.

Suppliers shall ensure that all their operations, including their own supply chain, comply with all applicable environmental, laws and regulations.



Operational Safety.

The commitment to Operational Safety must be reflected in Supplier's Safety Management System, or alternative, to drive in a meaningful way continuous improvement such it becomes part of the organizational safety culture.

Safety engagement

Suppliers should remember that their actions may significantly impact the lives of passengers, airline personnel, and fellow employees. An ongoing engagement at all levels with the overarching principle of operational safety is essential.

Therefore, suppliers must be constantly aware of the potential impact on Safety in relation to their activities, and Top Management/Stakeholders should demonstrate commitment to Safety and adopt a proactive mindset within the company as well as encourage their employees to act in the same way.

Reporting and sharing

Suppliers must do their utmost to ensure safety hazards and potential risks are reported, investigated and appropriate mitigations set in place to minimize the exposure to potential risks.

Furthermore, safety related events should not be used to attribute blame to the personnel, but with the purpose to learn and improve. Safety critical information should be shared with stakeholders, clients, and employees within the appropriate reporting frameworks.

Trust and credibility

Suppliers must be committed to work in a spirit of openness, trust, transparency and cooperation with all the relevant stakeholders to address and continually improve safety performance of the company's fleets.

Quality

We expect that suppliers set up an effective quality management system or alternative (which ensures compliance with all applicable International and Local requirements as well as internal Company standards. Quality culture should be implemented through appropriate organizations and processes in order to deliver a high level of service, in terms of safety and quality, on time and on costs. It is a must that suppliers comply with the company requirements in line with the relevant Regulations, International standards as well as procedures and policies.

Furthermore, the company expects that suppliers deploy and run continuous improvement approach in areas that benefit the company such as but not limited to safety, quality, delivery, service, technology, compliance and competitiveness.



Information & Data Protection

Protecting Sensitive, Confidential, and Proprietary Information

Suppliers must ensure that all sensitive, confidential and proprietary information is appropriately protected.

Suppliers must comply with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 94/46/EC (General Data Protection Regulation) (hereinafter referred to as the GDPR) If suppliers do not comply with GDPR, the company will not be able to have business relationship with them thereof.

For personal data transfer throughout the European Economic Area, the company and suppliers shall conduct Data Processing Agreement which template is provided by the company.

For Personal Data transfers to the Third Country in case of any of the following 4 scenarios: Personal Data is transferred to the Third Country between Controller and Controller (Module 1); Personal Data is transferred to the Third Country between Controller and Processor (Module 2); Personal Data is transferred to the Third Country between Processor and Processor (Module 3); and Personal Data is transferred to the Third Country between Processor and Controller (Module 4), the company and suppliers conduct Personal Data Transfer Agreement.

Suppliers must not use information for any purpose (e.g. advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information. Furthermore, Personal data might be processed only when there is at least one of the legal bases for personal data processing provided in Article 6(1) of the GDPR. Suppliers must protect the sensitive, confidential and proprietary information of others, including personal data/ information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures, including mitigating emerging risks to information systems by implementing appropriate IT cyber security programs.

Rights of data subjects

Data subjects, whose personal data are processed, have certain rights under the GDPR. In particular, the following rights are: the right to be informed; the right of access; the right to rectification; the right to erasure; the right to restrict processing; the right to be forgotten; the right to withdraw consent; the right to portability; the right to object; the right to object to automated processing. The data controller is responsible for ensuring that these rights are respected and can be exercised by data subjects. The data controller must have mechanisms in place to respond to data subject requests related to these rights and handle them in a timely and compliant manner.

Suppliers must report any suspected or actual data breach or security incident as soon they are aware to the Company. It is worth noting that regarding GDPR part 85 of the preamble, the controller, as soon as becomes aware that a personal data breach has occurred, should notify the personal data breach to the supervisory

authority without undue delay and, where feasible, not later than 72 hours after having become aware of it, unless the controller is able to demonstrate, in accordance with the accountability principle, that the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where such notification cannot be achieved within 72 hours, the reasons for the delay should accompany the notification and information may be provided in phases without undue further delay. This requirement is also valid for suppliers when they act as data controllers.

Intellectual Property

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

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

In relationship with the company , suppliers must comply with all applicable data privacy laws and regulations.

Insider Trading

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

Cyber security

Suppliers shall protect the sensitive, confidential, and proprietary information of others, including personal data/information, from unauthorized access, destruction, use, modification, and disclosure, through appropriate physical and electronic security procedures, including mitigating emerging risks to information systems by implementing appropriate IT cyber security programs. Suppliers shall report to the company any suspected or actual data breach or security incident as soon they are aware.

In order to guarantee the compliance with security requirements, the company might carry out audits or send dedicated questionnaires to suppliers.



Global Trade & Export Control

Import

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

Export and Sanctions

Suppliers must ensure that their business practices are in accordance with all applicable laws, directives and regulations including economic sanctions and embargoes, governing the export and transfer of parts, components, and technical data and services. Suppliers shall provide truthful and accurate information and obtain export licenses and/or consents where necessary.

Responsible Sourcing of Minerals

Suppliers must comply with applicable laws and regulations regarding (direct and indirect) sourcing of critical material and conflict minerals. Those materials include “conflict minerals”: – tin, tungsten, tantalum and gold originating from conflict areas –, rare earth elements, as well as other minerals or metals (e.g. bauxite, cobalt, titanium, lithium).

Suppliers are expected to provide products made from materials, including constituent minerals, that are sourced ethically (i.e. with limited environmental impacts and not detrimental to Human Rights) to ensure that there is no risk of conflict minerals or critical material being embedded in the Client’s product. Suppliers shall support efforts to eradicate the use of any minerals which directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses.

Suppliers shall conduct due diligence and provide supporting data on their sources and supply chain of custody for these minerals when requested. In the event that the material ‘chain of custody’ supplied is “indeterminable” or otherwise unknown, the supplier is expected to either attain the appropriate certifications or phase out that material.

Counterfeit Parts

Suppliers shall develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of counterfeit parts and materials being delivered. Effective processes should be in place to detect, report and quarantine counterfeit parts and materials and to prevent such parts from re-entering the supply chain. If counterfeit parts and/or materials are detected or suspected, suppliers should provide immediate notification to the recipients of such counterfeit parts and/or materials.

Payment of Taxes

Suppliers must ensure they comply with all applicable tax laws and regulations in the countries where they operate and be open and transparent with the tax authorities. Under no circumstances should suppliers engage in deliberate illegal tax evasion or facilitate such evasion on behalf of others.

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

Timely Payment of suppliers

We expect suppliers to be fair and reasonable in their payment practices and pay undisputed and valid invoices on time in accordance with agreed contractual payment terms.



Governance & Management Systems

Maintain Accurate Records

We expect suppliers to have in place appropriate controls to accurately and securely create, store and maintain business records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.

Speak up culture and whistleblower protection

The company encourages suppliers to report their concerns relating to the company's ethical misconduct, such as bribery, corruption, fraud, or other improper payments; potential money laundering or other suspicious activity; or inappropriate conflicts of interest and any violations from what is outlined in this SCoC.

Reports can be submitted to the company by clicking [here](#). These reports may be made anonymously and confidentially.

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

Consequences for violating the code

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

Supplier Commitment

By familiarizing itself with the content of this document, the supplier demonstrates its intent to uphold the principles of the company Supplier Code of Conduct in all present and future business interactions and agreements with the company.

The supplier agrees to flow down the company Supplier Code of Conduct principles to its affiliates, subsidiaries, and to their subcontractors involved in business with the company. These Supplier Code of Conduct principles shall be incorporated into any routine sustainable business practices.

The company Supplier Code of Conduct will be part of the tendering process documentation and adherence thereto by the supplier will be one of the mandatory criteria assessed by the company during the selection process.

Upon becoming acquainted with the company Supplier Code of Conduct, the supplier acknowledges that this document will serve as an integral part of all existing contracts with the company and will govern all ongoing and future business interactions and contractual agreements. The company Supplier Code of Conduct represents a minimum standard of best practices. It shall be governed by the law of the relevant Contract (if any). In the event there is no Contract, this document shall be applicable to all relationships between the supplier and the company and applicable law.

The supplier undertakes to comply with all other obligations arising from the laws of the country in which the service is provided, without those set out in this code of conduct being restrictive or exhaustive.