

Middlesex
Aerospace



Global supplier code of conduct

Issue 1.0 July 2022

Our values

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Trust

Respect

Professional

Delivering excellence

Sharing knowledge

Integrity

Accountability

Honesty

Scope of the code

This Global Supplier Code of Conduct (the Code) applies to all suppliers to Middlesex Aerospace and other partners who supply products and services using contracts or purchasing terms.

Middlesex Aerospace expects all suppliers to fully comply with applicable laws and adhere to internationally recognised environmental, social and corporate governance standards. Middlesex Aerospace expects suppliers to implement these standards with their suppliers and subcontractors.

As a key component of our supplier qualification process, the Code sets out minimum standards and expectations for suppliers and the broader supply chain. Your Middlesex Aerospace contact will work with you to complete this process, and it may be necessary for you to provide us with copies of your business code of conduct, notices, supporting policies and procedures as evidence of your commitment to the standards and expectations set out in this document.

This Code applies to the design, manufacture, maintenance and distribution of parts and provision of services. The Code will be specified in all relevant contracts, commercial and purchasing terms as a contractual requirement for suppliers to Middlesex Aerospace.

In order for Middlesex Aerospace to provide quality assurance to our customers, the relationship with our suppliers must ensure that the design, manufacturing and maintenance standards used are agreed and that suppliers and their suppliers and subcontractors are operating and recording achievement of quality control and assurance.

It is expected that suppliers to Middlesex Aerospace will have their own defined and documented code of conduct that is equivalent to or sets higher standards than this Code. Where Middlesex Aerospace suppliers are in conflict or disagreement with the Code, this must be declared when you return the Supplier Commitment. Where non-compliance is disclosed or identified, we work closely with the supplier providing necessary support including assistance with corrective action plans to reach compliance with this Code, conducting follow-up audits if required.

Middlesex Aerospace requires suppliers to periodically re-state this commitment including when the Code is updated, by physically signing the document or agreeing to meet the expectations set out in the Code when accepting commercial terms or other work instructions from Middlesex Aerospace.

At Middlesex Aerospace we speak up about anything that concerns us or is not in line with the principles set out in our codes and policies without fear of retaliation. We expect our suppliers to do the same. If a supplier has a concern relating to any subject covered by this Global Supplier Code of Conduct or engagement with Middlesex Aerospace, we encourage you to speak with your Middlesex Aerospace contact without delay. Retaliation against anyone who speaks up will not be tolerated.

Anti-bribery & corruption

Middlesex Aerospace has a zero-tolerance policy for bribery and corruption and expects all suppliers to behave ethically in all business transactions. Middlesex Aerospace will never offer, give or accept anything of value that may be viewed as, or has the effect of, improperly influencing business decisions.

What this means for our suppliers:

- Conducting business honestly, fairly and free from any bribery and corruption.
- Only offering gifts and hospitality, for legitimate business purposes, in an open and transparent manner and never offering or giving gifts (including charitable donations) as an attempt to influence another person to act improperly.
- Never offering a public official a financial or other advantage with the intention of influencing them in their capacity as a public official.
- Complying with all applicable anti-bribery and corruption laws and regulations, including the UK Bribery Act and US FCPA (as if they applied to your business).
- Never offering or making facilitation payments.

Conflicts of interest

Middlesex Aerospace aims to avoid any situation where conflicts of interest might be seen as influencing our business decisions or behaviour, or might stop us from acting in the best interests of our employees, customers, suppliers, partners and communities. If we believe there is, or might be, a conflict of interest, we speak up.

What this means for our suppliers:

- Minimising conflicts of interest in the conduct of your business and having systems in place to identify and mitigate appropriately any potential conflicts that may arise.

Competitive behaviour & anti-trust

Middlesex Aerospace conducts business in compliance with competition and anti-trust laws.

What this means for our suppliers:

- Complying with competition and anti-trust laws in countries of operation, including but not limited to laws relating to cartels, pricing, resale pricing, market sharing, bid rigging, terms of trading, purchase or supply terms, joint ventures and dominance (whether held individually or collectively).
- Never orchestrating market conduct with competitors or other suppliers or partners in a way that improperly restricts competition.
- Where appropriate, having systems in place to identify and lawfully manage any necessary exchange of competitively sensitive information.

Diversity equity & inclusion

Middlesex Aerospace values the unique perspectives of a diverse workforce and is committed to delivering equal opportunities. We treat all our colleagues, suppliers and partners the same - with openness, honesty, courtesy and fairness.

We have zero-tolerance toward bullying, harassment or discrimination of any kind. Our goal is to promote inclusive practices that provide fair treatment in access, equal opportunity and advancement to all suppliers that satisfy our procurement purchasing and contracting standards.

What this means for our suppliers:-

- Valuing and encouraging diversity within your workforce and talent pipelines to support increased representation and inclusion.
- Respecting and observing equality and human rights legislation and promoting equal opportunities for all.
- Operating zero-tolerance of bullying, harassment and / or discrimination towards workers, including all forms of physical, verbal or psychological abuse.
- Working collaboratively with Middlesex Aerospace to ensure that all suppliers and their workers are protected from bullying, harassment and discrimination, can compete fairly and have an equal chance of success.

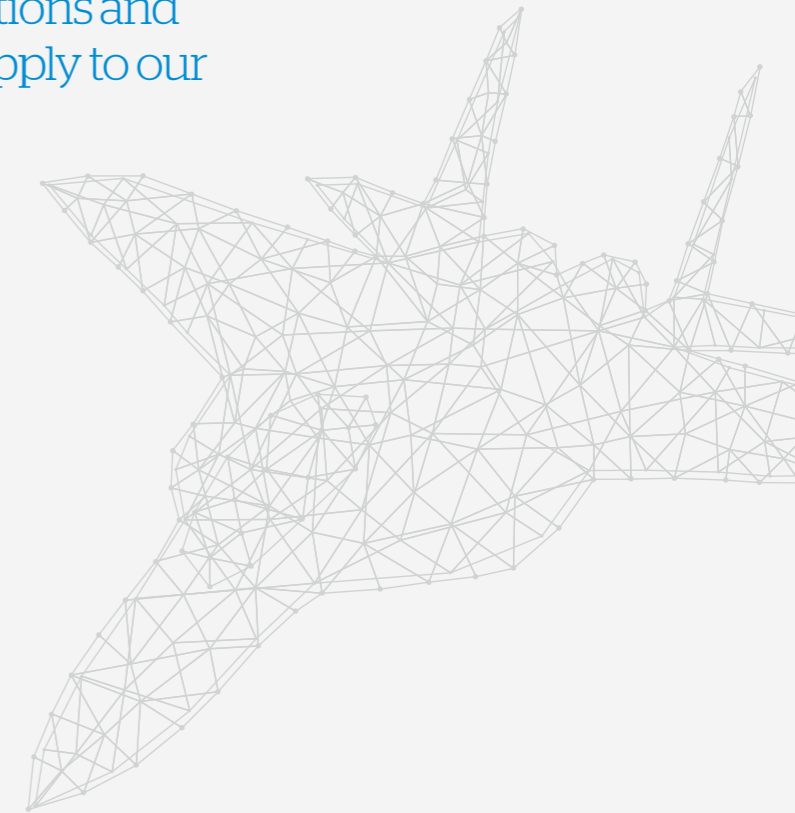


Export & import controls, sanctions & obligations

Middlesex Aerospace is committed to compliance with import and export laws, sanctions and regulations and procedures that apply to our operations globally.

What this means for our suppliers:-

- Complying with all relevant sanctions, import and export control legislations when engaging with third parties and importing or exporting goods or technology.
- Planning for and obtaining all necessary authorisations and permits required to ensure timely and compliant delivery.
- Having in place the necessary processes to manage access to export controlled goods or technology and ensure access is only given to parties authorised to have such access and, where applicable, cascaded to any sub-tier parties.



Fair pay & benefits

Middlesex Aerospace is committed to fair pay and recognises the need to fairly reward performance and contribution.

What this means for our suppliers:-

- Ensuring all wages meet the legally required minimum wage and benefits requirements.
- Complying with all local laws, regulations and procedures concerning the payment of wages and benefits, including overtime compensation.
- Ensuring compliance with the relevant rules in respect of maximum working time.

Health, safety & environment (HSE)

Middlesex Aerospace operates a 'safety first' business. We aim to create an environment where safety of people is a priority with no injuries, no work-related health issues and no environmental incidents.

Equally, preventing negative impacts of our products and services drives our HSE initiatives.

What this means for our suppliers:-

- Joining us with personal and collective responsibility to help fulfil our HSE goals.
- Providing employees, partners and visitors with appropriate health and safety information and training, including information about risks they are exposed to and relevant control measures.

- Committing to managing HSE risks and to proactively protecting the health, safety and the welfare of their own employees, suppliers, partners, other customers, visitors and those in the community who may be impacted by their activities.
- Adopting procedures and practices to minimise any negative impacts to the environment.

Lobbying & political support

Middlesex Aerospace will only consider lobbying activities in compliance with all applicable laws, and to the extent such behaviour is consistent with an ethical approach to our interactions with governments, agencies and their representatives.

What this means for our suppliers:-

- Only undertaking lobbying activities in compliance with prevailing applicable laws.
- Always behaving ethically in interactions with governments, their agencies and representatives.

Maintaining accurate records

Middlesex Aerospace is committed to maintaining accurate and complete records for all business transactions and operates policies and procedures to support this Code.

What this means for our suppliers:-

- Maintaining accurate and complete records of all business transactions



Preventing facilitation of tax evasion

Middlesex Aerospace will never knowingly help our customers, suppliers or anyone else we work with to evade tax or facilitate the evasion of tax.

What this means for our suppliers:-

- Never asking us to do anything that helps them evade tax or facilitate the evasion of tax.

Responsibly sourced materials

Middlesex Aerospace is committed to working with suppliers who ensure and can demonstrate responsible sourcing of materials.

What this means for our suppliers:-

- Only providing products made from materials, including constituent minerals, that are sourced responsibly and verified as 'conflict free' in accordance with the OECD guidelines.
- Providing Middlesex Aerospace with supporting data of their supply chain of minerals when requested.
- Committing to attaining appropriate certifications or phasing out material when the material 'chain of custody' supplied is "indeterminable" or otherwise unknown.
- Having effective processes in place to detect counterfeit parts and materials and applying stringent checks to ensure no counterfeit items enter the Middlesex Aerospace supply chain



Safeguarding the confidential information of others

Middlesex Aerospace believes that technologies, intellectual property and commercially sensitive and confidential information are vital business assets and we protect our own from unauthorised access, use and disclosure

What this means for our suppliers:-

- Having systems in place to safeguard our information and ensure that all data and documents are kept secure.
- Keeping confidential information confidential and never using information which you should not.
- Never offering or supplying Middlesex Aerospace with information where you should not have it in your possession or control.
- Using appropriate nondisclosure or confidentiality agreements to protect our confidential and proprietary information



Slavery, human trafficking & labour exploitation

Middlesex Aerospace believes that all employment should be freely chosen. Middlesex Aerospace opposes all forms of slavery, human trafficking and labour exploitation

These are criminal offences in many countries, and we have a duty to prevent such practices. We will not accept child labour or any practice that inhibits the development of children.

What this means for our suppliers:

- Never using involuntary labour of any type including forced, prison or debt-bonded labour.
- Never using or supporting practices that inhibit the development of children. Never employing anyone under the age of sixteen (16) years or, where it is higher, the mandatory national school leaving age.
- Ensuring workers have access to legal representation and advice where appropriate.
- Complying with applicable labour, employment and modern slavery laws including minimum living wages and maximum working hours.

Working with customers, suppliers, partners & communities

Middlesex Aerospace has a policy of always competing fairly and with integrity. When seeking new suppliers we conduct thorough due diligence.

We take steps to only select suppliers and partners with values and business behaviour that meet the high ethical standards we set for ourselves. We support communities where we can and investment can be financial, time or in kind support.

What this means for our suppliers:

- Considering reputation and conduct first, and only engaging with others who meet our shared standards.
- Listening carefully to requests or concerns from the community and addressing them appropriately, and seeking out opportunities to support your local communities.

Your commitment

Gaining commitment to and understanding of the Global Supplier Code of Conduct (the Code) is part of the Middlesex Aerospace supplier qualification process.

- The Code sets out minimum standards and expectations only. You are required to comply with all laws applicable to you and any additional requirements set out in commercial terms with Middlesex Aerospace.
- The Code should be communicated and made available to your workers in your business language and where appropriate you will need to provide regular training to workers that includes all of the minimum standards and requirements mandated by the Code.
- You will encourage your workers, and your own suppliers and subcontractors to speak up about anything that concerns them or is not in line with the principles set out in the Code without fear of retaliation.
- Appropriate supporting documentation must be retained to demonstrate compliance with the Code and Middlesex Aerospace can request access to that documentation at any time.
- Middlesex Aerospace reserves the right to audit against compliance with the Code and you must provide copies of your business codes, notices, supporting documents, policies and procedures when asked. You will cooperate with Middlesex Aerospace to enable Middlesex Aerospace to access supplier sites for audit purposes.
- You may be required to provide details of the actions you are taking to ensure slavery, human trafficking and labour exploitation, are not taking place in any part of your business or the businesses of your suppliers and subcontractors and you must notify Middlesex Aerospace as soon as you become aware of any instance of potential slavery, human trafficking or labour exploitation.
- Middlesex Aerospace may reserve the right in its contracts with you, to terminate such agreements in the event of a material breach of the requirements set out in the Code.
- You will cascade the requirements set out in the Code to your suppliers and subcontractors and incorporate the principles set out in this document as part of routine sustainable business practices.

Company name (print):

Company address (print)

Authorised signatory

Name (print)

Job title (print)

Signature, date and company stamp:

Please sign declaration and return it to your named contact at Middlesex Aerospace.

Acknowledgement

By certifying this Global Supplier Code of Conduct, you are acknowledging that:

- You have read and understood it.
- You have had the opportunity to ask questions about how it affects you and your work.
- You will ask the right questions when you are not sure about what to do.
- You will comply with it in letter and spirit, respecting the rights of others and behaving with integrity, honesty and in an ethical manner.
- You will complete all required training within the appropriate time and ask for it if you don't get it.
- You will ensure that all people who report to you will receive the appropriate training and guidance.
- You understand your obligation to Speak Up regarding any suspected violation in a timely manner.
- You will cooperate in any investigation, including in the event of a possible violation.

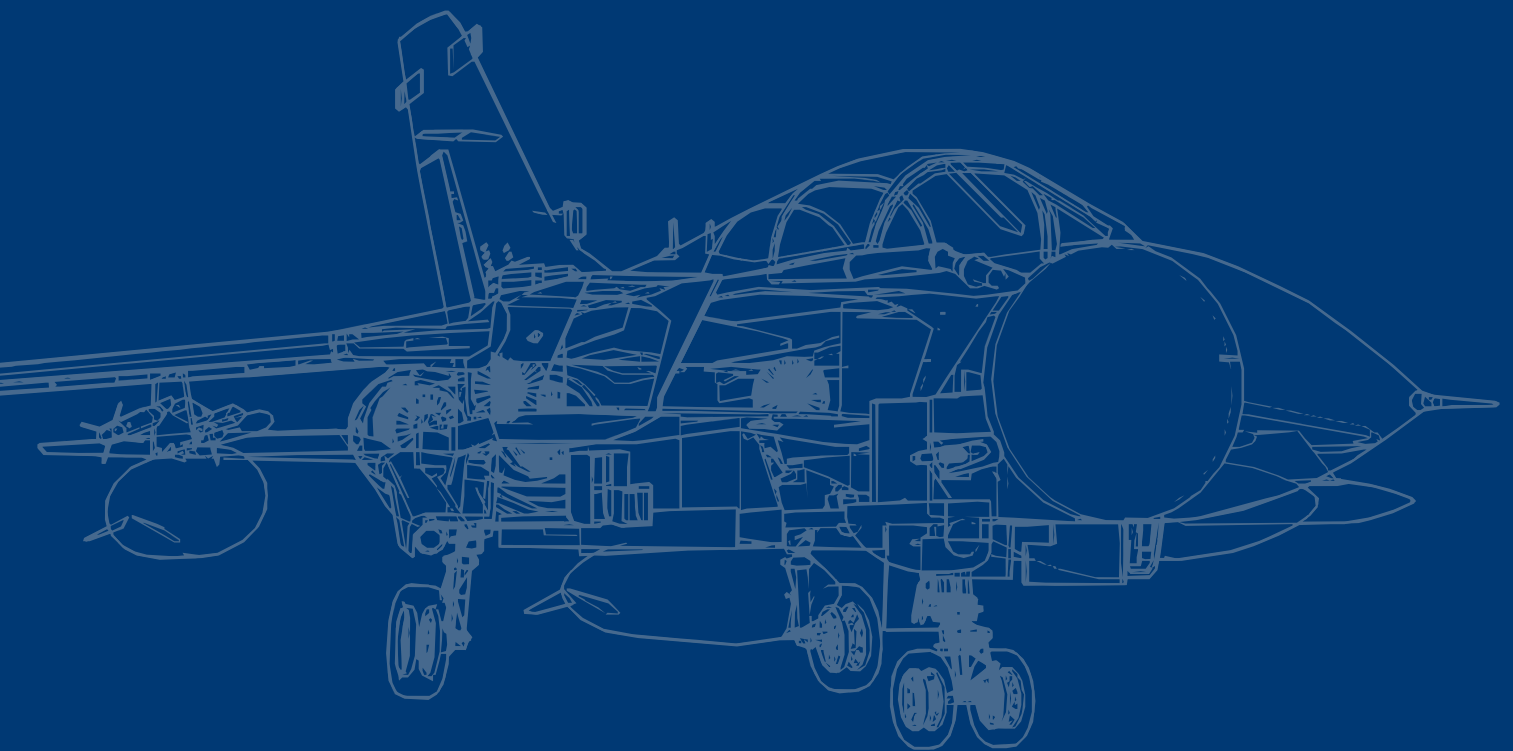


Contact us

For more information relating to our Code please contact your Middlesex Aerospace business contact in the first instance.

Or visit the website at
www.middlesex aerospace.com

Or telephone
00 44 1256 353711



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