

**CORPORATE PRINCIPLES ON RESPONSIBILITY, ANTI-CORRUPTION, CONDUCT AND ETHICS**

Compliance with ethical values is necessary for long-term economic success. This includes treating each other fairly and acting within the framework of the given norms in everyday business. We consider the success of our customers to be the key to generating long-term and sustainable business success and see it as a matter of course to meet the requirements of all interest groups.

The management bears the responsibility for a sustainable corporate strategy and its corresponding implementation. Integrity as well as compliance with laws and ethical principles are essential elements in maintaining the authenticity of our company. In combination with the management principles as well as the quality, safety and environmental guidelines, standards and directives are laid down which ensure respectful and dignified treatment of employees, safe working conditions and a sustainable approach to the environment.

**The Code of Conduct contains the following:**

- How our management fulfils its responsibilities
- How we interact with our employees and colleagues
- What behavior customers/suppliers can expect from us
- What behavior we expect from our customers/suppliers
- How we behave in dealing with the public and the environment

Each manager, each employee, each supplier and each customer is responsible for behaving in accordance with this Code (paragraphs 14 to 18 are only valid within Hebmüller Aerospace Inc.). The behavior of our managers is exemplary because they live up to the principles of conduct and are committed to them in every situation.

**1. HUMAN RIGHTS**

The dignity of every human being is respected and promoted, and the protection and observance of international human rights is advocated. It is understood that no child labor will be used, and all forms of forced labor will be rejected. Working conditions that conflict with international or national laws and practices will not be tolerated.

**2. WAGES AND EMPLOYEE BENEFITS, WORKING TIMES**

Remuneration and benefits must be guaranteed in accordance with the basic principles of minimum wages, overtime hours and employee benefits. Working hours must comply with applicable laws, industry standards or relevant ILO-conventions. Overtime hours should only be provided on a voluntary basis and employees should be granted at least one day off after 6 consecutive working days.

**3. PREVENTION OF CHILD LABOUR**

The employer warrants that the manufacture or processing of his products has been carried out without exploitative child labour. The employer guarantees compliance with obligations under applicable national and international regulations to combat exploitative child labour. Furthermore, the employer assures that his company, its suppliers, and their subcontractors have taken active and targeted measures to prevent exploitative child labour.

---

The Supplier shall oblige his sub-supplier and their subcontractors accordingly and in this regard conduct control measures. The contents of this agreements will be checked by the Hebmüller Aerospace Inc. The supplier will prove his actions on request of the Hebmüller Aerospace Inc.

**4. FREE CHOICE OF EMPLOYMENT**

No one will be employed or forced to work against their will. Employees must be free to terminate the employment relationship within a reasonable time. Employees may not be required to hand over their ID card, passport, or work permit as a condition of employment.

**5. FREEDOM OF ASSOCIATION, RIGHT OF COLLECTIVE NEGOTIATION**

Workers must be able to communicate with the management straightforwardly about working conditions without fear of reprisals whatsoever. They must have the right to join forces, join a union, appoint a representative and be elected to one.

**6. HEALTH AND OCCUPATIONAL SAFETY**

The health and safety of employees is protected to the highest degree by providing a healthy and safe working environment. By complying with nationally applicable safety regulations, everyone ensures a safe and healthy working environment.

**7. FIGHT AGAINST CORRUPTION AND COMPLIANCE**

Within the scope of its business activities with the Hebmüller Aerospace Inc., the supplier is obliged to refrain from anything that could lead to criminal liability for fraud or breach of trust, insolvency offenses, crimes against competition, granting of advantages, bribery, venality or other corruption offenses of persons employed by the supplier or otherwise third parties. In the event of a breach of this, the Hebmüller Aerospace Inc. is entitled to a right of withdrawal or termination without notice of all legal transactions existing with the supplier and the right to terminate all negotiations. Without prejudice to the above, the supplier is obliged to comply with all applicable laws and regulations on him and the business relationship with the Hebmüller Aerospace Inc..

**8. BAN OF DISCRIMINATION**

Discrimination against employees in any form is prohibited. This applies to discrimination based, for example, on gender, race, skin color, disability, trade union membership, political beliefs, origin, religion, age, pregnancy, or sexual orientation. No form of discrimination on the above grounds will be used in recruitment, remuneration, training opportunities, promotion, dismissal, or retirement. Employees are also required to take a firm stand against such discrimination.

**9. DISCIPLINARY MEASURES**

The use of corporal punishment, mental or physical coercion and verbal abuse is strongly discouraged.

**10. SAFETY AND QUALITY**

All products and services must meet the contractually agreed quality and safety criteria upon delivery and can be safely used for their intended purpose.

**11. SUPPLIERS**

Hebmüller Aerospace Inc. places high expectations on its suppliers and requires them to adhere to the same strict principles in the conduct of their business, especially in the treatment of employees, as are applied by the company itself.

**12. COMPLIANCE**

This Code of Ethics and Conduct has been approved by the management and communicated to all employees, suppliers, and customers. Employees shall comply with this Code in the performance of their duties without exception. Stricter or more detailed guidelines may apply to specific regions, countries, or functions, but they are generally in line with these Corporate Principles. Questions of application or interpretation, as well as reports of potential violations, shall be addressed to the respective supervisor.

**13. ACTION IN THE EVENT OF NON-COMPLIANCE**

Procedures, practices, or actions by employees that are in conflict with this Code shall be corrected and will result in disciplinary action. Depending on the severity of the violation and the history (e.g., repetition), this may result in an admonishment, warning or even termination. If suppliers or other business partners do not comply with the requirements, this would be discussed with the supplier and remedial action is urged. Depending on the severity of the violation or previous history (e.g., repetition), it may also lead to a termination of the business relationship. If employees, suppliers, or other business partners of Hebmüller Aerospace Inc. violate the rules or their behavior gives cause for concern, the management should be informed immediately.

14-Oct-25

Date



Signature MD

14-Oct-25

Date



Signature QMR

Date

Signature Supplier/Customer

**14. CONFLICTS OF INTERESTS AND BRIBERY/CORRUPTION**

All employees of Hebmüller Aerospace Inc. avoid situations in which their personal or financial interests' conflict with those of the company. In particular, they are forbidden to participate in companies of competitors, customers or suppliers or to enter into business relationships with them in a private environment if this would cause a conflict of interest. Such a conflict always exists if the nature and extent of a participation is capable of influencing actions in the exercise of our company's activities in any way. Our employees unequivocally refrain from requesting, accepting, or receiving unjustified or unlawful advantages that could influence business decisions or transactions. Likewise, none of our employees will offer, procure, or attempt to procure improper advantages for business partners, their employees or other third parties in business activities of any kind or enter into agreements to this effect.

**15. MOTIVATION AND CONTINUING TRAINING OF EMPLOYEES**

Hebmüller Aerospace Inc. considers motivated employees and their identification with the company's goals as an essential success factor. The promotion of employees is particularly emphasized. The company focuses on job-related continuing education that can be applied in the company as well as the development and promotion of future leadership potentials.

**16. PROTECTION OF ASSETS AND CONFIDENTIALITY**

Everyone at Hebmüller Aerospace Inc. is expected to protect the company's tangible and intangible assets, to treat trade and business secrets and customer or supplier-related business information confidentially and to comply with the applicable data protection principles.

**17. ENVIRONMENT AND RECYCLING**

As a company in the field of valve technology, Hebmüller Aerospace Inc. is committed to nature and the environment. The company protects its environment by using state-of-the-art equipment. Each of its employees contributes to the production of high-quality surfaces in environmentally friendly processes, including the responsible use of energy resources.

**18. SOCIAL COMMITMENT**

Each member of Hebmüller Aerospace Inc. expressly assumes their responsibility as a citizen of the community in which they operate, and they commit themselves to open communication with all authorities as well as social and public interest groups.

**19. GERMAN ACT ON CORPORATE DUE DILIGENCE IN SUPPLY CHAINS**

Hebmüller Aerospace Inc. is committed to the Corporate Due Diligence in Supply Chains Act and to protecting internationally recognized standards. It must be ensured that internationally recognized human rights and environmental protection are respected in the supply chains and that there is no lack of transparency in their enforcement.

---

Date

---

Signature MD

---

Date

---

Signature Employee