



# supplier code of conduct.



**aps** | aviation  
parts service 

# preamble.

We strongly believe that social responsibility has to be an integral part of any conduct in business. Our social responsibility manifests in our value system based on responsible and ethical conduct towards employees, business partners, society and the environment. Compliance with the law in our business activities is a matter of course for us.

The Supplier Code of Conduct of aps Aviation Parts Service GmbH (aps) is based on the principles of internationally recognised standards for responsible corporate governance. These include, for example, the Global Compact of the United Nations (UN), the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD) and the labour and social standards of the International Labour Organisation (ILO). This commitment must also find expression in the relationships we maintain with our Business Partners.

For our Business Partners, this Supplier Code of Conduct sets out binding minimum standard in the business relationship with aps. We believe that a shared commitment to integrity and responsible corporate management and conduct of business is imperative to all our business relationships. We therefore expect our Business Partners to respect and implement the underlying Code of Conduct.

We would like to thank all Business Partners who join our efforts and commit to responsible and ethical conduct in business, support and advocate such principles.

# scope of application.

## compliance.

The provisions of this Code of Conduct set forth our expectations for all suppliers and further business partners with whom aps does business (Business Partners). aps expects that these principles apply to Business Partners and their employees, parent, subsidiary or affiliate entities, and subcontractors. aps expects Business Partners to ensure that this Code of Conduct is communicated to their employees, parent, subsidiary and affiliated entities as well as any subcontractors, and that it is done in the local language and in a manner that is understood by all. In order for a Business Partner to be qualified as an aps supplier or to do business with aps, the Business Partner is required to read and acknowledge that this Code of Conduct provides the minimum standards expected of aps Business Partners. In addition, Business Partners should note that certain provisions of this Code of Conduct constitute binding terms and conditions of any contract with aps. Failure to comply with certain provisions may also preclude Business Partners from being eligible for a contract.

## continuous improvement.

The provisions as set forth in this Code of Conduct provide the minimum standards expected of Business Partners to the aps. aps welcomes all effort by Business Partners to strive to exceed both international and industry best practices. aps strongly suggest that its Business Partners encourage and work with their own suppliers and subcontractors to ensure that they also strive to meet the principles of this Code of Conduct. aps recognizes that reaching some of the standards established in this Code of Conduct is a dynamic rather than static process and encourages Business Partners to continually improve their workplace conditions accordingly.

## management & monitoring system.

It is the expectation of aps that its Business Partners, at a minimum, have established clear goals toward meeting the standards set forth in this Code of Conduct. aps also expects that its Business Partners will establish and maintain appropriate management systems related to the content of this Code of Conduct, and that they actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct.

Business Partners are expected to establish a process for timely correction of deficiencies and creation of documents and records to ensure compliance and conformity, along with appropriate confidentiality to protect privacy.

# trade compliance.

## commitment to ensure compliance with export control laws.

aps is committed to helping to ensure our global security by, among other things, complying with all United States and the EU applicable international export control laws. aps expects all Business Partners, as our direct suppliers and/or customer, to similarly comply with applicable export control laws.

Because the products and/or services our Business Partners are purchasing are, or may be, subject to Export Control laws and regulations, by doing business with aps the respective Business Partner confirms the following:

- (a) Not to export/re-export/transfer/sell/resell products supplied by aps, to customers who intend to purchase or transfer aps supplied Products for end-use in any country or destination subject to comprehensive export controls or economic sanctions (Embargoed Country), which currently include Russia, Belarus, Cuba, Iran, North Korea, Sudan, Syria, and Crimea.
- (b) Not to export/re-export/transfer/sell/resell products supplied by aps to any party not eligible to receive them, or purchase aps Supplied products on behalf of such parties. (For example, persons listed on the Denied Persons List, Entity List, Specially Designated Nationals List, Sectoral Sanctions Identifications List, or similar lists maintained by governments with jurisdiction).
- (c) Not to export/re-export/transfer/sell/resell products supplied by aps if they will be or are intended to be used for a military end-use or by a military end-user of the following countries listed in the Export Administration Regulations (EAR) D1 or D5 country list: Afghanistan, Armenia, Azerbaijan, Belarus, Burma, Cambodia, Central African Republic, China, Cuba, Cyprus, Democratic Republic of Congo, Eritrea, Georgia, Haiti, Iran, Iraq, Kazakhstan, Kyrgyzstan, Laos, Lebanon, Libya, Macau, Moldova, Mongolia, North Korea, Russia, Somalia, Sudan, South Sudan, Syria, Tajikistan, Turkmenistan, Ukraine, Uzbekistan, Venezuela, Vietnam, or Zimbabwe.
- (d) Not to process or incorporate products supplied by aps and technology into secondary products, including supercomputers, which contribute to the design, development, manufacture, production, testing, stockpiling, or use of any nuclear, chemical, or biological weapon.

## compliance certification.

By doing business with aps, Business Partners also certify:

- (a) That they are not a party designated under U.S or EU Sanctions.
- (b) That they are neither owned nor controlled by a designated party under U.S or EU Sanctions.
- (c) That the answers they have provided remain applicable and extend to any order or purchase where they request Intel to export the product directly to another organization on their behalf.
- (d) That they will notify aps of any changes to these responses.

# labour.

## freedom of association and collective bargaining.

aps expects its Business Partners to recognize the freely-exercised right of workers, without distinction, to organize, further and defend their interests and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.<sup>1</sup>

## forced or compulsory labour.

aps expects the prohibition of slavery to be respected as a jus cogens norm.<sup>2</sup> Forced labour, i.e. any work performed by a person against their will and under threat of punishment, as well as any other modern forms of slavery and human trafficking are not tolerated by aps.<sup>3</sup>

## child labour.

aps do not tolerate child labour as defined by ILO Conventions 138 and 182 and national laws. aps expects its Business Partners not to employ:

- (a) children below 14 years of age or, if higher than that age, the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is higher; and
- (b) persons under the age of 18 for work that, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of such persons.<sup>4</sup>

## discrimination.

aps expects its Business Partners to ensure equality of opportunity and treatment in respect of employment and occupation without discrimination on grounds of race, colour, sex, religion, political opinion, national extraction or social origin and such other ground as may be recognized under the national law of the country or countries where the performance, in whole or in part, of a contract takes place.<sup>5</sup>

Furthermore, aps expects its Business Partners to take all appropriate measures to ensure that neither themselves nor their parent, subsidiary, affiliate entities or their subcontractors are

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<sup>1</sup> As set out in the ILO fundamental Conventions, No. 87, Freedom of Association and Protection of the Right to Organise, 1948 and No. 98, Right to Organise and Collective Bargaining, 1949.

<sup>2</sup> M. Cherif Bassiouni, "Enslavement as an International Crime", New York University Journal of International Law and Politics, vol. 23, 1991, p. 445; Yearbook of the International Law Commission 1963, vol. II, United Nations sales publication No. 63.V.2, pp. 198-199 ("[B]y way of illustration, some of the most obvious and best settled rules of jus cogens . . . included trade in slaves."); Human Rights Committee, General Comment No. 24, United Nations document HRI/GEN/1/Rev.5, para. 8; see also A. Yasmine Rassam, "Contemporary Forms of Slavery and the Evolution of the Prohibition of Slavery and the Slave Trade Under Customary International Law", Virginia Journal of International Law, vol. 39, 1999, p. 303.

<sup>3</sup> As set out in the ILO fundamental conventions, No. 29, Forced Labour, 1930, its Protocol of 2014 and No. 105, Abolition of Forced Labour, 1957.

<sup>4</sup> As set out in the ILO fundamental Conventions, No. 138, Minimum Age, 1973 and No. 182, Worst Forms of Child Labour, 1999 and in the UN Convention on the Rights of the Child.

<sup>5</sup> As set out in the ILO fundamental Conventions, No. 100, Equal Remuneration, 1951 and No. 111, Discrimination (Employment and Occupation), 1958.

engaged in any gender-based or other discriminatory employment practices, including those relating to recruitment, promotion, training, remuneration and benefits.

#### wages, working hours and other conditions of work.

aps expects its Business Partners to ensure the payment of wages in legal tender, at regular intervals no longer than one month, in full and directly to the workers concerned. Business Partners should keep an appropriate record of such payments. Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law, regulations or collective agreement, and Business Partners should inform the workers concerned of such deductions at the time of each payment. The wages, hours of work and other conditions of work provided by suppliers should be not less favorable than the best conditions prevailing locally (i.e., as contained in: (i) collective agreements covering a substantial proportion of employers and workers; (ii) arbitration awards; or (iii) applicable laws or regulations), for work of the same character performed in the trade or industry concerned in the area where work is carried out.<sup>6</sup>

#### health and safety.

aps expects its Business Partners to ensure, so far as is reasonably practicable, that:

- (a) the workplaces, machinery, equipment and processes under their control are safe and without risk to health;
- (b) the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; and
- (c) where necessary, adequate protective clothing and protective equipment are provided to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects to health.<sup>7</sup>

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<sup>6</sup> As set out in ILO Conventions No. 95, Protection of Wages, 1949 and No. 94, Labour Clauses (Public Contracts), 1949 and in a number of Conventions addressing working time (see: <http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/workingtime/lang-en/index.htm>)

<sup>7</sup> As set out in the ILO Conventions, Recommendations and Codes of Practice (see: <http://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/occupational-safety-and-health/lang-en/index.htm>)

# human rights.

## respect of human rights.

aps expects its Business Partners to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.<sup>8</sup>

## harassment, harsh or inhumane treatment.

aps expects its Business Partners to create and maintain an environment that treats all employees with dignity and respect. aps further expects that its Business Partners, their parent, subsidiary and affiliated entities as well as any subcontractors, will neither use or engage in, nor allow their employees or other persons engaged by them to use or engage in, any: threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse. Sexual exploitation and abuse violate universally recognized international legal norms and standards and aps categorically refuses any affiliation to any such conduct. aps expects the respect of standards that include, but are not limited to, the prohibition of:

- (1) engaging in any sexual activity with any person under the age of 18, regardless of any laws of majority or consent,
- (2) exchanging any money, employment, goods, services, or other things of value, for sex, and/or
- (3) engaging in any sexual activity that is exploitive or degrading to any person.<sup>9</sup>

aps expects its Business Partners to take all appropriate measures to prohibit their employees or other persons engaged by the suppliers, from engaging in sexual exploitation and abuse. The expectation of aps is that Business Partners create and maintain an environment that prevents sexual exploitation and abuse. The failure by a Business Partner to take preventive measures against sexual exploitation or abuse, to investigate allegations thereof, or to take corrective action when sexual exploitation or abuse has occurred, constitute grounds for termination of any agreement with aps. Moreover, no harsh or inhumane treatment coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

## mines.

aps expects its Business Partners not to engage in the sale or manufacture of anti-personnel mines or components utilized in the manufacture of anti-personnel mines.

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<sup>8</sup> Principles derived from Universal Declaration of Human Rights (UDHR) and are set out in the United Nations Global Compact (see [http://www.unglobalcompact.org/Issues/human\\_rights/index.html](http://www.unglobalcompact.org/Issues/human_rights/index.html))

<sup>9</sup> As set out in ILO Conventions No. 190, Violence and Harassment, 2019  
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# environment.

## environmental concerns.

aps expects its Business Partners to have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Business Partners should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.

## chemical and hazardous materials.

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

## wastewater and solid waste.

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.

## air emissions.

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

## minimize waste, maximize recycling.

Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.



# ethical provisions.

## corruption & bribery.

aps expects its Business Partners to adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery.

Business Partners should use discretion and care to ensure that any expenditure offered to or received by any aps employee is in the ordinary and proper course of business and could not reasonably be construed as a bribe or improper inducement. Business courtesies cannot be designed or appear to be designed to influence the recipient and secure unfair preferential treatment.

A general guideline for evaluating whether a business courtesy is appropriate are legally permissible frameworks and whether public disclosure would be embarrassing to the Business Partner or aps. aps expects its Business Partners to refrain from any kind offering and business courtesy that: (i) does not serve a bona fide business purpose; (ii) inappropriately influence, or appear to influence, any business decision; (iii) is offered during any pending bidding or negotiation process that can be connected to the Business Partner; (iv) is not given in an open and transparent manner; (v) is unlawful or contrary to ethical business principles, local business customs, or the customer, vendor, competitor, or partner's company policy.

## conflict of interest.

Business Partners of aps are expected to disclose to aps any situation that may appear as a conflict of interest, and disclose to aps if any aps employee may have an interest of any kind in the Business Partner's business or any kind of economic ties with the Business Partner.

## fair competition.

aps expects its Business Partners to comply with applicable antitrust and competition law. aps Business Partners are committed to fair and undisturbed competition as the basic principle of a free economy. aps expects its Business Partners to refrain from restrictive agreements with competitors, suppliers, distributors, dealers and customers as well as restrictive practices. These include, for example, price-fixing agreements with competitors, the division of customers or sales territories between competitors, anti-competitive boycotts and the illegal exchange of competitively sensitive information with competitors.

# data protection.

## confidentiality of business information and preservation of reputation.

aps expects its Business Partners to protect confidential information from unauthorised disclosure and misuse, as well as protecting the reputation of aps' reputation in public statements. aps Business Partners ensure that confidential information and data is carefully stored, not passed on or made accessible to unauthorised persons and are used exclusively for the agreed business purposes. Discussing confidential information in public and social media or unauthorised disclosure of information about the company or its customers to third parties, such as the media or competitors, is a breach of confidentiality and may constitute antitrust violations, among other things.

## data protection, information security and disclosure of information.

aps expects Business Partners to adhere to applicable data protection laws, including security of personal data, as well as to respective regulation, e.g. GDPR, in particular with regard to personal data of customers, consumers, employees and shareholders. Business Partners shall comply with all said requirements when personal data is collected, recorded, hosted, processed, transmitted, used or erased.

The information security requirements applicable to Business Partners with regards to any data entrusted to their control during and after their engagement with aps are based on international standards, such as the Code of Practice for Information Security Management. Business Partners should take account of the need to protect the confidentiality, integrity and availability of information. At all times the required level of information security and control to be ensured by Business Partners must be commensurate with the sensitivity, value and criticality of the information being processed throughout the lifecycle of the information.

aps expects its Business Partners to safeguard and make only appropriate use of confidential information. Business Partners shall comply with any contractual requirements on data protection and information security and shall not disclose any information that is not known to the general public.

# reporting violations & contact persons.

The guidelines described in these Supplier Code of Conduct are critical to the ongoing success of aps' relationship with its Business Partners. If you have questions or concerns about compliance or ethics issues outlined in this Code of Conduct or want to report illegal or unethical activities send an e-mail to [QM@aps-aviation.com](mailto:QM@aps-aviation.com). Your message will be routed to the appropriate representative for assistance or guidance as necessary. You are also welcome to contact the aps Management:

Wolfgang Dillbaum-Alexius

GENERAL MANAGER AND EXECUTIVE SHAREHOLDER

+49 2161 – 46 72 112

Sabine Lomanns

MANAGING DIRECTOR

+49 2161 – 46 72 110

All matters raised in good faith through these reporting lines will be handled on a confidential nonretaliatory basis. All information will be maintained as confidentially as practical in light of the need to conduct an investigation and implement remedial measures. Anonymity will be granted upon request by the reporting person.