



## **SUPPLIERS' CODE OF ETHICS**

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## 1. OUR VALUES

S4A, Solutions for Aviation, S.L. is guided by the following corporate values, which frame our behaviors and decision-making:

- Customer Passion: We anticipate and meet customer needs with dedication and excellence.
- Proactive Commitment: We act with initiative, responsibility, and a results-driven approach.
- Continuous Resilience: We adapt to change and strive to overcome challenges constructively.
- Intellectual Inquiry: We promote creativity, innovation, and the continuous pursuit of knowledge.
- Exponential Transparency: We act with integrity, clarity, and honesty in all our relationships.
- Excellence and Quality: Our performance is based on the highest quality standards, certified under UNE-EN-ISO 9001 (Quality Management System) and EN/AS 9100 (Aerospace Quality Management System), ensuring continuous improvement, operational efficiency, and customer satisfaction.

These values reflect our commitment to excellence, integrity, and innovation, in line with our vision of being a benchmark in efficient, sustainable, and safe aeronautical solutions.

## 2. CHANGE HISTORY

EDITION	DATE	CHANGES
01	25-11-2025	Original Edition

## 3. EMPLOYEES AND HUMAN RIGHTS

Suppliers of S4A, Solutions for Aviation, S.L. shall carry out personnel selection based on the skills, professional experience, and training required for each position, implementing recruitment practices in accordance with all applicable laws and regulations, and shall comply with the following:

- Emphasize respect for fundamental rights and fully comply with legal prohibitions related to slavery and child labor, avoiding any form of discrimination.

- Guarantee freedom of association, opinion, and expression for their employees.
- Respect and promote absolute respect for differences and opinions of others, prohibiting any form of harassment or discrimination.
- Protect workers through appropriate safety equipment, devices, systems, and procedures.
- Not require employees to work more daily hours than the maximum established by applicable local or national legislation and regulations.
- Provide a safe, healthy, productive, and dignified working environment.

## 4. COMPLIANCE WITH FREE COMPETITION LAWS

All suppliers of S4A, Solutions for Aviation, S.L. must compete ethically and fairly in the marketplace, paying particular attention to competition and antitrust regulations.

They shall not engage in misleading or denigrating advertising against competitors and must obtain competitor information ethically and in compliance with applicable regulations. This is essential for compliance with free competition legislation, being aware of the damage that non-compliance may cause to the company and its employees.

No agreements with competitors that unlawfully restrict free trade—such as price-fixing, boycotts, or bid-rigging—shall be entered into.

## 5. ANTI-BRIBERY

Suppliers of S4A, Solutions for Aviation, S.L. must commit to refraining from any practices that may be considered dishonest. Bribery and/or extortion are not permitted under any circumstances. Suppliers must be aware that S4A, Solutions for Aviation, S.L. does not allow giving or receiving gifts, payments, or other benefits that may influence any business decision. Suppliers commit to:

- Not inducing individuals, local or foreign officials, or public servants to act illegally or improperly.
- Not offering or giving gifts to employees or their close relatives that may improperly influence business relationships with S4A, Solutions for Aviation, S.L., or that may impair objectivity and independence of judgment.
- Not offering, paying, lending, promising, or transferring anything of value to a government agent or official, including cash contributions or indirect contributions.
- Not using intermediaries or third parties to make improper payments.
- Ensuring, before engaging with third parties or intermediaries, that they have a good reputation and a willingness to comply with this Code of Ethics.

The possibility of giving gifts is accepted provided that their value cannot be considered excessive, luxurious, or extravagant. Acceptable gifts include:

- Small customary items of a symbolic or promotional nature (e.g., pens, agendas).

- Invitations to conferences, professional meetings, or events with a moderate cost (e.g., training courses or business meals).

In case of doubt regarding the appropriateness of a gift, invitation, or hospitality, the supplier must consult the S4A Compliance Body in advance.

## 6. ENVIRONMENTAL RESPONSIBILITY

Suppliers of S4A, Solutions for Aviation, S.L. must commit to environmental protection and comply with the following:

- Comply with all applicable environmental legal requirements regarding hazardous waste, atmospheric emissions, discharges, and wastewater.
- Ensure proper management and control of waste, atmospheric emissions, noise, hazardous products, soil impact, and facility maintenance.
- Apply necessary preventive measures to avoid hazardous or emergency situations during the performance of the contracted work.
- Provide all environmental documentation requested.
- When providing services at S4A facilities and removing hazardous and/or non-hazardous waste, ensure collection in appropriate containers according to the quantity to be removed. Any environmental emergency situation must be immediately reported to the organization's contact person or the Environmental Manager.
- Hold all mandatory environmental permits and registrations.

## 7. OCCUPATIONAL HEALTH AND SAFETY

Suppliers of S4A, Solutions for Aviation, S.L. must promote the adoption of occupational health and safety policies and implement preventive measures established by applicable legislation, ensuring that all activities are carried out in safe and healthy workplaces.

Any supplier must stop any activity that may be considered risky. Working under the influence of alcohol, drugs, or any other substance that may impair behavior or personal judgment is strictly prohibited.

## 8. CONFIDENTIAL AND/OR PRIVILEGED INFORMATION

Confidential information is understood to be any non-public information related to the company and its executives, stakeholders, operations, activities, plans, investments, and strategies. Employees are responsible for the proper use of information and must take the necessary measures to ensure its confidentiality.

By way of example and not limitation, confidential or privileged information includes:

- Accounting information and financial projections.
- Mergers, acquisitions, partnerships, expansion plans, and business plans.
- Commercial and operational policies and practices.
- Judicial or administrative disputes.
- Personal information of S4A, Solutions for Aviation, S.L. employees.
- Intellectual property, trademarks, patents, and copyrights.
- Lists of customers, suppliers, structures, and pricing policies.

The use or disclosure of confidential or privileged information without authorization violates this Code of Ethics and may be illegal. It is prohibited to use such information for personal gain, directly or indirectly. Misuse may lead to civil or criminal liability, without prejudice to disciplinary actions established by the company.

## 9. PROTECTION OF INFORMATION AND ASSETS. INTELLECTUAL PROPERTY

Suppliers of S4A, Solutions for Aviation, S.L. must respect intellectual property, business information, and any other information provided for the performance of contracted activities. All information and data must be treated as confidential. Supplier obligations include:

- Respecting and protecting intellectual and industrial property rights through the exclusive use of legitimately licensed information technologies and software.
- Not disclosing information internally except where strictly necessary to perform services for S4A.
- Not disclosing information to third parties outside the supplier organization.
- Not using information for the supplier's own benefit or for the benefit of any other person.

- Implementing appropriate technical and organizational security measures across facilities, systems, programs, and personnel involved in information processing to prevent alteration, loss, or unauthorized access.

## 10. GENERAL POLICY

S4A, Solutions for Aviation, S.L. has established its Integrated Management Policy under the principles of UNE-EN-ISO 9001 (Quality Management System), AS/EN-ISO 9100 (Aerospace Quality Management System), and UNE 19601:2017 (Criminal Compliance Management System).

Aware of its commitments to customers and stakeholders, S4A confirms its commitment to continuous improvement and excellence in all its activities and services, including:

- Design and control of the manufacture of aeronautical systems and structures under development.
- Aircraft design updates.
- Aeronautical consulting.

This policy integrates key interests of S4A and its stakeholders in line with our vision: to be a global benchmark in the development of efficient and innovative aeronautical solutions that enable our customers' aircraft to operate continuously, sustainably, and safely. It establishes a framework of Ethical Principles, Quality, Information Security, Service Safety and Quality, Occupational Health and Safety, Equal Opportunities, Environment, and Criminal Compliance, materialized in the following commitments:

- Providing services based on sustainable development with ethical and social responsibility principles.
- Complying with expectations, legal requirements, customer standards, and applicable criminal legislation.
- Maximizing customer satisfaction through quality-driven criteria.
- Complying with aeronautical safety standards and promoting safe, effective, and sustainable air transport.
- Protecting and properly processing personal data and information.
- Promoting a safe and healthy working environment and team well-being.
- Encouraging a positive work climate, equal opportunities, non-discrimination, respect for diversity, and work-life balance.

- Developing processes with maximum respect for the environment.
- Ensuring business profitability as a guarantee of future growth.
- Identifying, assessing, and controlling criminal risks associated with activities to prevent crimes and unlawful conduct.
- Ensuring top management acts as a role model of ethics, integrity, and compliance, fostering a criminal compliance culture throughout the organization.
- Providing continuous training and awareness for employees and collaborators on ethics, legal compliance, and crime prevention.

All members of the organization and related third parties must report any suspicious facts or conduct. Secure, confidential, and accessible communication channels are implemented to report potential non-compliance, ensuring protection against retaliation for good-faith reporters.

S4A prohibits the commission of any criminal acts within the scope of its activities. A Compliance Body with sufficient authority and independence will be established to oversee the effectiveness of internal criminal compliance controls and the continuous improvement of the integrated management system.

This Policy is communicated to S4A personnel and made available to stakeholders. It is reviewed annually. Non-compliance may result in disciplinary measures proportionate to severity.

S4A promotes employee commitment to these principles and provides the necessary resources to establish, implement, maintain, and improve the Management System, supported by five corporate values: Customer Passion, Proactive Commitment, Continuous Resilience, Intellectual Inquiry, and Exponential Transparency.

## 11. REPORTING OF SUSPICIOUS CONDUCT

To report suspicious conduct or potential violations of this Code of Ethics, suppliers are encouraged to contact their primary S4A contact.

If not possible, reports may be made through any of the following channels:

- Via the Whistleblowing Channel is available on the S4A website.
- By email to: [compliance@s4a.es](mailto:compliance@s4a.es)
- By written or verbal communication to any member of the Compliance Body.
- By postal mail to: C. de Ramírez de Arellano, 17, 1st Floor, Cdad. Lineal, 28043 Madrid, Spain.

The Organization guarantees that no retaliation will be taken against anyone who, in good faith, reports suspected bribery, corruption, or violations of this Code. This protection extends to employees

and third parties who cooperate in internal investigations or report misconduct through the established channels. No retaliation will occur for refusing to participate in activities reasonably considered to pose criminal risk, provided it has been reported through appropriate channels.