ST AIRBORNE SYSTEMS
Experts in airborne surveillance

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CODE OF CONDUCT

SUPPLIER CODE OF CONDUCT

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1 PURPOSE

AT ST Airborne Systems, we are committed to conducting business responsibly, ethically and in compliance with applicable laws and regulations. We expect our suppliers and business partners to share these commitments and actively contribute to sustainable, secure and ethical business practices throughout the value chain.

This Supplier Code of Conduct outlines the minimum requirements expected from all suppliers providing products, services or other business support to ST Airborne Systems AB. We are committed to conducting business in a responsible, ethical and sustainable manner. We expect our suppliers, subcontracts and business partners to share these principles and actively support compliance with applicable laws, regulations and internationally recognized standards.

These requirements apply throughout the supplier's organization and should where relevant, be communicated to subcontractors and business partners within the supply chain.

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2 BUSINESS INTEGRITY AND ETHICAL CONDUCT

Suppliers shall conduct business with integrity, transparency and professionalism. All business activities shall be performed in compliance with applicable laws, regulations and contractual obligations.

Suppliers are expected to maintain effective compliance programs and internal to ensure adherence to relevant legislation, including competition law, anti-corruption regulations, export control requirements, sanctions regulations and environmental and labour laws.

Any actual or potential conflict of interest that could affect the supplier's relationship with ST Airborne Systems AB shall be disclosed without delay. Suppliers shall maintain accurate business records and ensure that all information provided to ST Airborne Systems AB is complete, truthful and reliable.

3 ANTI-CORRUPTION AND FAIR BUSINESS PRACTICES

ST Airborne Systems AB maintains a zero-tolerance approach to bribery, corruption, fraud and other unethical business practices.

Suppliers shall not directly or indirectly offer, promise, authorize, request or accept any form of improper payment, gift, hospitality or other benefit intended to influence a business decision. Business entertainment and gifts shall be reasonable, transparent, infrequent and fully compliant with applicable laws and industry practices.

Suppliers shall establish measures to prevent corruption within their own organizations and supply chains and shall promptly report any suspected violations related to business conducted with ST Airborne Systems AB.

4 HUMAN RIGHTS AND LABOUR STANDARDS

Suppliers shall respect internationally recognized human rights and conduct their operations in accordance with the principles of the UN Universal Declaration of Human Rights and the ILO Core Conventions.

Employment shall be freely chosen, and all forms of forced labour, bonded labour, human trafficking and involuntary prison labour are strictly prohibited. The use of child labour shall not be tolerated under any circumstances.

Suppliers shall provide equal opportunities and maintain workplaces free from discrimination, harassment and abusive treatment. Employees shall be treated with dignity and respect and shall receive fair compensation and working conditions that comply with applicable laws and collective agreements.

Workers shall be free to communicate concerns regarding workplace conditions without fear of retaliation.

5 HEALTH, SAFETY AND WELL-BEING

Suppliers are expected to provide a safe and healthy working environment and actively manage occupational health and safety risks.

Appropriate procedures shall be in place to identify hazards, prevent accidents and reduce workplace injuries and illnesses. Employees shall receive relevant training, protective equipment and information necessary to perform their work safely.

Suppliers are encouraged to continuously improve their health and safety performance through risk assessments, incident reporting, corrective actions and preventive measures.

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6 ENVIRONMENT AND SUSTAINABILITY

Suppliers shall conduct their operations in an environmentally responsible manner and work systematically to reduce environmental impacts.

This includes minimizing waste generation, reducing emissions, promoting efficient use of energy and natural resources, and ensuring responsible handling of chemicals and hazardous substances.

Suppliers shall comply with applicable environmental legislation and are encouraged to establish environmental management systems that support continuous improvement and sustainable business practices. Consideration should also be given to climate-related impacts and opportunities to reduce greenhouse gas emissions throughout the product lifecycle.

7 QUALITY, PRODUCT SAFETY AND RELIABILITY

Suppliers shall maintain management systems and work processes that ensure the consistent delivery of products and services meeting agreed requirements for quality, safety, performance and reliability.

Where applicable, suppliers shall establish controls to ensure product traceability, configuration management and prevention of counterfeit parts. Any non-conformance that may affect delivered products or services shall be communicated to ST Airborne Systems AB without undue delay.

For products used in safety-critical applications, suppliers shall ensure compliance with applicable industry standards, customer requirements and regulatory obligations.

8 INFORMATION SECURITY AND CONFIDENTIALITY

Suppliers shall protect confidential, proprietary and sensitive information obtained through their relationship with ST Airborne Systems AB.

Appropriate technical and organizational measures shall be implemented to safeguard information against unauthorized access, disclosure, alteration or loss. Information shall only be used for the purpose for which it was provided and shall not be shared with third parties without prior authorization.

Particular attention shall be given to information relating to dual-use, security-sensitive technologies, export-controlled products and intellectual property rights.

9 CYBERSECURITY

Suppliers are expected to maintain appropriate cybersecurity practices to protect information assets, networks, systems and products from cyber threats.

Cybersecurity controls should include risk assessments, access management, employee awareness training, incident response procedures and measures to protect against malware, unauthorized access and data breaches.

Any cybersecurity incident that may affect information, products, services or operations associated with ST Airborne Systems AB shall be reported promptly.

10 EXPORT CONTROL, SANCTIONS AND TRADE COMPLIANCE

Suppliers shall comply with all applicable export control, sanctions and trade compliance regulations in the countries where they operate.

Products, technical data, software and services subject to export controls shall be properly classified and managed throughout the supply chain. Suppliers shall not engage in transactions involving sanctioned countries, organizations or individuals when prohibited by applicable laws.

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Upon request, suppliers shall provide information necessary to support export control assessments, including classification data, country of origin information and end-use restrictions. Suppliers dealing with defence-related products or dual-use items are expected to maintain effective procedures for managing export control compliance.

11 RESPONSIBLE SUPPLY CHAIN MANAGEMENT

Suppliers are encouraged to apply these principles throughout their own supply chains and to exercise due diligence regarding human rights, environmental protection and ethical business conduct.

Where significant risks are identified, suppliers should implement actions to mitigate such risks and monitor the effectiveness of those measures. ST Airborne Systems AB may request information regarding supply chain management practices as part of supplier evaluations and audits.

12 MONOTORING, AUDITS AND CORRECTIVE ACTIONS

ST Airborne Systems AB reserves the right to assess compliance with this Supplier Code of Conduct through questionnaires, documentation reviews, supplier evaluations or audits.

Suppliers are expected to cooperate in such assessments and provide relevant information upon request. When non-conformities are identified, suppliers shall implement timely corrective actions and demonstrate progress toward resolution.

Serious, repeated or intentional violations of this Code of Conduct may result in suspension or termination of the business relationship.

SUPPLIER ACKNOWLEDGEMENT

By conducting business with ST Airborne Systems AB, the supplier acknowledges the principles set forth in this Supplier Code of Conduct and commits to operating in accordance with its requirements. The supplier further undertakes to promote these principles throughout its organization and, where applicable, within its supply chain.

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