

## skyguide Supplier Code of Conduct

skyguide is committed to high standards of integrity and sustainability and expect from all of its suppliers to conduct their business ethically.

As supplier from skyguide, you must comply with all applicable laws and regulations, the requirements set out in this Supplier Code of Conduct and your contractual obligations to us.

### Human rights

Suppliers shall respect the personal dignity, privacy and rights of each individual.

Suppliers shall refuse to make any person work against his or her will and prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

### Child labour

Suppliers must not tolerate or use child labor in any stage of its activities other than in accordance with all applicable laws and regulations.

### Compensation and working hours

As a minimum, Suppliers will comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits. Wages should be paid regularly, on time and be fair in respect of work performance. Weekly working time must not exceed the legal limit. Employees should be granted their stipulated annual leave and sick leave without any repercussion, and should take their stipulated maternity or paternity leave in accordance with national laws.

### Non Discrimination

All conditions of employment must be based on an individual's ability to do the job, not on the basis of personal characteristics or beliefs. Subject to local laws, Suppliers will not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, disability, marital status, pregnancy or political affiliation.

### Freedom of association

Suppliers agree to work directly with employees to find solutions to any outstanding legal and employment issues while at all times respecting any applicable rights to be represented. Suppliers agree to comply with local laws so that workers' rights are maintained, including the rights to join labour unions, seek representation and/or bargain collectively.

### Fair business & regulatory compliance

Suppliers will comply with all applicable laws and regulations in all locations where they conduct business, especially with respect to strict compliance with all laws and regulations on bribery, corruption and prohibited business practices.

In particular, Suppliers shall not bribe any public official or private person and shall not accept any bribes.

Gifts, hospitality and entertainment are modest and never offered, promised or provided with the intent of causing the recipient to do something favoring the supplier and/or skyguide, to reward such behavior, or to refrain from doing something disadvantaging the supplier and/or skyguide. Sponsoring is not to be used (or perceived to be used) to receive an improper commercial advantage in return.

Lobbying is not to be misused for any corrupt or illegal purposes, or to improperly influence any decision.

Suppliers are expected to report any non-compliance they will be aware of, observe, and suffer from, to the skyguide supply management or the skyguide legal department.

## Environment

Suppliers should take all the necessary steps to protect the environment in the various regions of the world in which they operate. At a minimum, Suppliers must comply with all applicable environmental laws, regulations and sound industry practice, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting.

Skyguide prefers suppliers whose goods or services have a reduced environmental impact.

## Health and Safety

Suppliers must provide employees with a safe and healthy working environment in accordance with applicable laws and industry standards, with access to adequate health and safety training. Suppliers must have in place health and safety policies and standards designed to reduce work-related injury and illness, and promote the general health of employees.

## Data Privacy

Suppliers shall handle personal information confidentially and sensitively, according to applicable law (Swiss Data Protection law and European General Data Protection Regulation (EU 2016/679)) and industry standards.

In particular, Suppliers shall have the proper organizational structure, processes and procedures to ensure the protection, confidentiality, integrity and availability of information against accidental, unauthorized or unlawful loss, destruction, alteration, disclosure, use or access.

These requirements apply to Suppliers and any third parties acting on their behalf.

Suppliers shall immediately notify skyguide for any suspected or actual data breach concerning the services/deliverables/goods provided. Suppliers shall appropriately assist skyguide in any investigations in response to a data or information breach.

## Working with our suppliers

skyguide aims to select, engage and treat all suppliers fairly, and to pay invoices on the agreed terms. Our purchasing system is formalized, ensuring that contracts, purchase orders and terms and conditions are in place.

Any non-compliance to the present Code of Conduct could lead to immediate ban, contract, orders and any other engagement cancellation, notwithstanding any penalty to compensate skyguide losses in the matter.