

Supplier Code of Ethics

At Aeroneuf, we are committed to high standards of service, product quality, honesty and integrity in all our business dealings and expect the same of our suppliers. This document establishes our expectations of suppliers, any authorized subcontractors, and their supply chain, in providing goods and services to Aeroneuf and its clients.

Compliance and Integrity

- Comply with all laws applicable to the production and delivery of goods and services for Aeroneuf, in addition to avoiding all forms of bribery, extortion, corruption and fraud
- Shall not attempt to impact an Aeroneuf employee's ability to make sound, impartial, and objective decisions on behalf of Aeroneuf
- Where relevant, maintain processes effective to minimize the risk of delivering counterfeit parts or materials

Labour, Health and Safety

- Ensure that no forced or child labour is used within the supply chain as per the applicable Canadian regulations in force under the Modern Slavery Act
- Comply with applicable employment and labour laws, including with respect to wages, rest periods, leave entitlements and collective bargaining rights
- Maintain health and safety standards designed to avoid or mitigate work-related injuries and illnesses in compliance with applicable health and safety laws
- Supplier is expected to comply with all applicable health and safety laws, regulations and where relevant, Aeroneuf required maintenance policies.
- Provide employees with reasonable access to potable water and sanitary facilities, fire safety equipment, emergency preparedness and response training and materials, industrial hygiene materials, adequate and safe work environments including with respect to lighting, ventilation, and machine safeguarding
- Prohibit discrimination, harassment, violence and abuse in the workplace.

Data Security and Privacy

- Store information securely and accurately and have in place appropriate information security policies and procedures
- Use information obtained through the relationship with Aeroneuf only for the purpose of the supply relationship
- Notify Aeroneuf promptly of actual or suspected privacy breaches, security breaches or losses of Aeroneuf private information

Environment

- Supplier will conduct its business and affairs in a prudent and responsible manner and with all due care and due diligence with respect to environmental matters
- Avoid unnecessary energy and water use in the course of offering goods and services for Aeroneuf
- Avoid unnecessary waste by employing the principles of prevention, minimization and reuse where possible
- Comply with applicable regulatory standards for the storage, transportation and disposal of hazardous materials and waste.

Subcontractors and Service Providers

- If Supplier is entitled to retain subcontractors under its business relationship with Aeroneuf, Supplier will ensure that the subcontractor also abides by this Code.
- This requirement will be integrated into Supplier's business processes for the selection, management, retention and performance of subcontractors and other suppliers to Supplier.

Reporting Concerns

Anyone who has reasonable grounds to believe that a supplier has breached this Code is encouraged to report their concerns to their Aeroneuf contact. Aeroneuf reserves the right to periodically request suppliers certify their compliance with this Code and, subject to legal and contractual rights, conduct compliance audits as required.



POLICY ON PREVENTION OF PSYCHOLOGICAL AND SEXUAL HARASSMENT IN THE WORKPLACE AND COMPLAINTS PROCEDURE MECHANISM

1. POLICY OBJECTIVES

AERONEUF INSTRUMENTS LTD/LTEE (“AERONEUF”) realizes that employee involvement and well-being play a vital role in ensuring that the company operates smoothly and effectively. We want to make sure that we promote such values as respect, equality and equity in order to foster positive collaboration among colleagues.

This policy is intended to ensure the physical and psychological integrity of the company’s employees; to provide a safe and healthy workplace; to prevent harassment; and, if applicable, to offer support and interventions aimed at putting an end to such harassment. AERONEUF subscribes to a “zero tolerance” approach to all forms of harassment and is committed to adopting any necessary and reasonable means to address it.

The objective of this policy is to establish a clear, effective and confidential reporting process for any form of harassment that is observed or experienced, as well as a complaints procedure.

2. SCOPE OF APPLICATION

This policy applies to all employees - permanent or temporary, full-time or part-time - as well as to executive officers, managers, customers, suppliers, subcontractors of AERONEUF.

The policy is in effect on company property, outside the workplace (while travelling, at customer sites, etc) and on social media, during and beyond normal work hours, whenever a situation has the potential to impact the work environment. Such situations include but are not limited to corporate events or other events among colleagues.

3. DEFINITION

This policy addresses **psychological and sexual harassment** in the workplace. The *Act respecting Labour Standards* defines harassment as any vexatious behaviour in the form of repeated conduct, verbal comments or actions:

- that are hostile or unwanted;
- that affect an employee’s dignity or psychological or physical integrity and
- that result in a harmful work environment.

This definition explicitly includes any vexatious behaviour of a sexual nature and/or words with a sexual connotation.

A single serious incidence of such behaviour that has a significant and lasting harmful effect on an employee may constitute psychological or sexual harassment.

4. SHARED RESPONSIBILITIES

A work environment that is healthy, safe and harassment-free is everyone's responsibility. This means that the employer, managers, employees and partners all have their own specific responsibilities to help ensure that the policy is properly implemented.

✓ Employer's responsibilities

- *Appointing an individual to be responsible for writing, disseminating, implementing and interpreting the policy;*
- *Distributing the policy to customers, suppliers, subcontractors and self-employed workers;*
- *Providing harassment training to employees and managers;*
- *Appointing an individual to be in charge of handling complaints;*
- *Providing support to employees who are affected by a harassment complaint;*

✓ Managers' responsibilities

- *Ensuring good working relationships within their teams;*
- *Treating any harassment disclosure or situation seriously; and*
- *Informing the person in charge of policy implementation of any complaints brought to the attention of management or of any behaviour that may be considered to constitute harassment;*

✓ Employees' responsibilities

- *Showing respect towards employees, managers, the employer, customers, suppliers, partners, etc.;*
- *Disclosing any harassment they have experienced or been made aware of;*
- *Complying with the policy;*

✓ Partners' responsibilities

- *Showing respect towards employees, managers, the employer, customers, suppliers, etc.*
- *Disclosing any harassment they have experienced or been made aware of;*
- *Complying with the policy;*

5. REPORTING AND COMPLAINTS PROCESS

When an incident of harassment is alleged, there is a reporting/complaints/inquiry process that must be followed. **AERONEUF** wishes to oversee this process and to ensure that everyone is aware of the applicable procedure.

To prevent harassment, **AERONEUF** encourages all individuals who experience an uncomfortable situation to inform their manager or Susy Nunes - Vice President. The person who has been apprised of a problem situation must then become actively involved; one of the principal reasons for this is to establish the complainant's version of events and to inform him/her of the informal and formal process for filing a complaint. With the consent of the complainant, They (the afore mentioned person above responsible for handling complaints) may meet informally with the alleged harasser to try to work out a mutually satisfying solution.

6. COMPLAINTS PROCESS

Employees, managers or any other persons subject to this policy who experience a situation of psychological or sexual harassment may file a formal complaint.

To file a formal complaint, a person who believes that he/she is a victim of harassment must request a copy of the prescribed form (see Appendix B) from Susy Nunes - VP. The form must be completed in its entirety before it is resubmitted.

Once the complaint has been received, Susy Nunes - VP, must make sure that the complainant can actually continue to work in a safe and healthy environment. Any temporary measures deemed appropriate and relevant by **AERONEUF** may be instituted, such as a schedule change or suspension with pay.

With due regard for the complainant's privacy, Susy Nunes - VP, then advises the alleged harasser(s) of the complaint and of the process that will be undertaken, of his/her impartiality and of the fact that they will have an opportunity to be heard if an inquiry is necessary.

All actions taken with respect to an inquiry will be confidential, unless the disclosure thereof is required for the holding of an impartial inquiry.

INQUIRY

Within a reasonable period of time after receipt of the complaint, Susy Nunes - VP, undertakes, on his/her own initiative, to gather information pertinent to the complaints procedure, or appoints another person to be in charge of the inquiry process if this is deemed to be more appropriate in light of his/her relationship with the persons who are the subject of the complaint.

AERONEUF reserves the right to institute an inquiry on its own if it has cause to believe that this policy has been violated.

The following steps must be followed to ensure that the complaint is handled in an objective manner:

- **Step 1: Admissibility analysis**

The admissibility analysis helps to rule out frivolous complaints or complaints falling directly within the scope of the employer's managerial rights.

- **Step 2: Relevance of carrying out an inquiry**

If the complaint is clearly frivolous, there is no need to launch an inquiry. Susy Nunes - VP, must then decide whether the problem situation needs to be addressed outside the context of this policy and advise the persons concerned.

If the complaint is admissible, the formal inquiry process must be launched.

- **Step 3: Inquiry**

Once the inquiry has been launched, the person responsible draws up an inquiry plan identifying the individuals to be interviewed and the documents to be analyzed. The entire process must be documented in writing. Interview canvasses and notifications are prepared prior to any meetings with the identified parties and are always carried out confidentially.

- **Step 4: Analysis, report and recommendations**

The person in charge of the inquiry then analyzes the information that has been gathered in order to write his/her report. The report is submitted solely and in confidence to Susy Nunes - VP, who will then communicate the inquiry findings to the persons concerned.

AERONEUF undertakes to act diligently and as expeditiously as possible whenever a potential harassment situation arises. Employees, managers and partners who seek in good faith to ensure that this policy is enforced will never be subject to any retaliatory measures on the part of the employer.

The individuals involved in a complaints/inquiry process acknowledge that their collaboration is vital to promoting a harassment-free work environment.

In the interest of integrity and to ensure the relevancy of this policy, any false or misleading statement made with the intent of harming a colleague or partner will be subject to disciplinary action that could lead to termination of employment.

7. CORRECTIVE ACTION

The employer undertakes to adopt any necessary and reasonable means required to put an end to any harassment situation; these may include but are not limited to the following measures and depend in particular on the seriousness of the situation and the attitude of the individuals concerned:

- *Schedule changes*
- *A change of manager or assignment to a different work team*
- *Disciplinary action appropriate to the seriousness of the acts committed (verbal or written notice, suspension)*
- *Harassment Training*
- *Termination of employment if necessary*

8. PERSON RESPONSIBLE FOR POLICY IMPLEMENTATION AND OTHER RESOURCES

Susy Nunes - VP, is responsible for implementing, interpreting, updating and disseminating the policy. Employees, managers or partners are invited to contact her if they have any questions or wish to report an incident of harassment.

9. ASSESSMENT AND REVIEW

An assessment report on policy implementation shall be produced every two years or as required. Depending on the assessment results, Susy Nunes - VP, determines whether certain aspects of the policy need to be revised. If applicable, all persons subject to the policy will be required to sign a new acknowledgement of receipt.

POLICY START DATE: 1 February 2024

APPENDIX A:

ACKNOWLEDGEMENT OF RECEIPT

I acknowledge having received a copy of the *POLICY ON THE PREVENTION OF PSYCHOLOGICAL AND SEXUAL HARASSMENT IN THE WORKPLACE AND COMPLAINTS PROCEDURE MECHANISM*. I further acknowledge that I have read and understood this policy and that I agree to comply with all the conditions and implementing rules stated therein. I realize that any violation of this Policy on my part may result in administrative or disciplinary action, including termination of employment.

Employee

Date

Employer (*Aeroneuf Instruments Ltd*)

Date

APPENDIX B:

COMPLAINT FORM

Name of complainant: _____ Position: _____

Address: _____ Telephone: _____

Description of complaint: _____

Time(s) of occurrence of facts and most recent occurrence: _____

Name(s) of alleged harasser(s): _____

Detailed description of facts: _____

Frequency: _____

Name(s) of witness(es): _____

Signature: _____ Date: _____