

Code of Conduct for Business Partners

Curious, Passionate, Together – these are the values that represent RUAG International and Beyond Gravity (including companies of the business segment Space (Beyond Gravity) and companies of the business segment Aerostructures, hereinafter referred to as “**Beyond Gravity**”, “**we**” or “**us**”) and recognize and set as an objective to combine its business operations with its social and environmental responsibilities. For Beyond Gravity, business relations with Business Partners i.e., its customers, suppliers, service providers as well as their own supply chain (“**Business Partners**”), are based on integrity, trust, and mutual respect.

Beyond Gravity also expects its Business Partners, to comply with integrity in every way. To substantiate this, Beyond Gravity sets out certain minimum standards. Beyond Gravity publishes this Code of Conduct for Business Partners on its website and draws its Business Partners’ attention to it as an extension to Beyond Gravity’s General Terms and Conditions.

1. Human rights, child and forced labour

Business Partners of Beyond Gravity must observe the United Nations Universal Declaration of Human Rights (including the ILO Minimum Age Convention No. 138 and Child Labour Convention No. 182). Beyond Gravity expects its Business Partners to have processes in place that ensure human rights within their operations, including their own supply chain, and to take reasonable measures to prevent or mitigate misconduct. Business Partners shall not use workers younger than the age of 15 or the applicable minimum legal age for working, whichever is higher. Business Partners shall make no use of forced or compulsory labour or of any forms of slavery. Business Partners shall comply with applicable national laws and regulations on working hours, wages and benefits and recognize the right of workers to form or join trade unions.

2. Equal opportunities and non-discrimination

Business Partners shall promote the diversity of its employees and shall not discriminate with regard to age, ethnic origin, religion, nationality, political or religious beliefs, gender, sexual orientation, physical condition, marital status or membership of employee representative bodies and comply with all applicable discrimination laws.

¹ tantalum, tin, tungsten, and gold, which are the extracts of the minerals cassiterite, columbite-tantalite and wolframite, respectively.

² these are resources needed to produce key technologies, being at risk of supply constraints, having environmental implications, financially

3. Health and safety

Beyond Gravity requires its Business Partners to ensure personal safety, safe working conditions and a healthy working environment for their whole workforce. Our Business Partners are also expected to take proactive measures to prevent workplace hazards, accidents and work-related illnesses and to protect employees from excessive exposure to chemical, biological and physical dangers and unsafe conditions such as lacking personal protective equipment, fire protection, sanitation, and other work-related accommodations.

4. Environment, sustainability and responsible sourcing

Beyond Gravity’s primary focus is to create responsible and sustainable operations by means of reducing its environmental impact and promote environmentally friendly technologies and processes. Business Partner shall comply with all applicable environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment. Business Partners are encouraged to monitor and mitigate/minimize risks arising from their operations with reference to ISO 14001 (or comparable).

Beyond Gravity’s Business Partners are expected to adequately reduce environmental impact in their production and transport/supply chains, e.g. by implementing action plans to increase efficiency, reduce greenhouse emissions, and waste management. Depending on the impact Beyond Gravity may request a self-evaluation of environmental risks by the Business Partner.

Our Business Partners should promote environmentally friendly technologies and processes not only within their own operations, but also across their supplier base, ensuring safe handling and disposal of hazardous and restricted substances.

Beyond Gravity’s Business Partners are expected to ensure responsible sourcing of raw materials and, depending on their possibilities, to adequately reduce their CO₂ footprint. All rules and regulations concerning responsible and sustainable sourcing like on the use of conflict minerals¹ and critical materials² must be followed, including satisfying any disclosure requirements.

costly, price volatile and deemed economically important and are difficult to substitute because of their unique properties, interest of different countries or for economic reasons. Lists of critical materials vary country to country.

5. Fair competition

Beyond Gravity acts as a fair and responsible competitor and expects the same etiquette of its Business Partners of upholding standards for fair business practices, advertising, and competition. Fair competition also includes not abusing dominant market positions, respecting the intellectual property of third parties and protecting information that is given in confidence, and only using such information within the framework of relevant agreements.

6. Zero-tolerance on corruption, fraud and money-laundering

Beyond Gravity applies a zero-tolerance policy on corruption and rejects any form of bribery or any other corrupt or fraudulent behaviour. Beyond Gravity expects its Business Partners neither to tolerate nor actively participate in corrupt activities regardless of whether this is regarding public officials or private individuals or organisations. This includes measures to detect unacceptable or suspicious forms of payment and activities that disguise the origin of funds derived from criminal activities. It is prohibited to offer, solicit, provide, request, or accept a benefit, or something of value, with the intention or effect of influencing the decision-making process of a Business Partner or public official. In the same way, providing anything of value may not influence Beyond Gravity's or the Business Partner's own decision-making process. Gifts and entertainment or other benefits should only be offered, given, or received in good faith and only if they are appropriate and in keeping with customary business hospitality and follow the local laws. Business Partners are expected to implement respective policies and procedures and to ensure their compliance with applicable laws and regulations within their own organization and across their own supply chain and to ensure adequate training of its employees on such topics.

7. Conflicts of interest

Business Partners shall disclose to Beyond Gravity any situation that may appear as a conflict of interest and disclose to Beyond Gravity if any Beyond Gravity officer, employee or professional under contract with Beyond Gravity may have an interest of any kind in that business or any kind of economic ties with the Business Partner. We also expect our Business Partners to be transparent and disclose any commercial, financial, or other significant direct or indirect links to government officials, political parties and public/government owned entities as well as any existing relationship(s) with Beyond Gravity employees or third parties working for Beyond Gravity.

8. Data Protection and confidentiality

Beyond Gravity takes the protection of data that relates to a person directly or indirectly ("**personal data**") seriously. Subject to any further requirements according to

the contract, Beyond Gravity expects its Business Partners to process personal data lawfully, transparently and confidentially and only for legitimate purposes, to adequately protect and update such data and ensure compliance with applicable data privacy legislation and with an adequate data processing agreement where needed.

Business Partners must ensure and follow the latest information security standards, implement appropriate physical and digital security (i.e. cyber security) programs and procedures. Business Partners must ensure, that all data, classified or unclassified, related to the business relationship is safeguarded according to its classification. In case of suspected or occurred data breaches, Business Partners must immediately notify Beyond Gravity.

9. Laws and regulations

Business Partner shall comply with local, national and international laws that are relevant for its business and as needed to enable Beyond Gravity's business to comply with such laws according to the scope of a contract. We expect our Business Partners to have appropriate policies and practices in place that apply to their employees and supply chains. If appropriate, Beyond Gravity may require its Business Partners to attend trainings provided by Beyond Gravity. Additional costs (e.g. time spent) must be covered by the Business Partner.

Business Partners shall always comply with national and international applicable export control laws and regulations as well as imposed sanctions and embargo laws. Business Partners shall cooperate with Beyond Gravity in determining and complying with applicable export control restrictions. This encompasses, but is not limited to, the evaluation of any documentation related to export control restrictions, clearly indicating whether or not they are subject to such controls.

In case of any violation of this Code of Conduct for Business Partners, Beyond Gravity shall be entitled to terminate any contract and business relations with the Business Partner with immediate effect without compensation and reserves the right to take legal action at its discretion.

10. Compliance Management System

Beyond Gravity expects its Business Partners to have an appropriate Compliance Management System (CMS) in place that considers company's size and industry. The CMS should ensure the adherence to the principles set forth in this Code of Conduct for Business Partners as well as all other applicable rules and regulations that apply to the Business Partner. Beyond Gravity may challenge the Business Partner's CMS and ask for adequate documentation.

11. Questions, comments and reporting

In the case of uncertainty in connection with the understanding and application of this Code of Conduct for Business Partners, please contact your direct contact to Beyond Gravity or any member of the Legal or Compliance Team.

Should any infringements be discovered, Beyond Gravity also offers the option to file anonymous notifications via its Whistleblower tool (<https://beyondgravity.speakup.report/beyondgravity>).

Business partner's acknowledgment/commitment

We have received, read, and understand the "Code of Conduct for Business Partners" (hereinafter referred to as the "**Code of Conduct**") in the version dated January 2025, and hereby commit ourselves to act in accordance with all requirements set in this the Code of Conduct, in addition to our obligations set in contractual agreements with RUAG International / Beyond Gravity.

We confirm that we understand the importance of the requirements set in this Code of Conduct as our duty when doing business with RUAG International / Beyond Gravity and are aware of the consequences of non-compliance with these requirements.

We recognize and commit to cooperating with RUAG International / Beyond Gravity during on-site reviews, as well as provide relevant information on any known misconduct(s) and breache(s) of this Code of Conduct as they relate to the business transaction/arrangement with RUAG International / Beyond Gravity.