



Aerospace
Transmission
Technologies

A Joint Company of Liebherr-Aerospace and Rolls-Royce

Code of Conduct

for Suppliers



1. Introduction

As a Joint Company of Liebherr-Aerospace and Rolls-Royce, Aerospace Transmission Technologies GmbH (hereinafter also referred to as “ATT”) maintains a relationship based on trust with its business partners. Among other aspects, ATT is guided by integrity, ethics, sustainability and lawful conduct. ATT expects the same conduct from its business partners, whether customers or suppliers (at all levels).

The present Code of Conduct for Suppliers (hereinafter referred to as the “Supplier Code of Conduct”) is based on the Code of Conduct of ATT and specifically reflects what ATT expects from its suppliers in this respect and what commitments they are making to ATT.

2. Social Responsibility

Suppliers undertake to fulfill their social responsibility towards employees and the company in a broader sense. In this context, attention should be paid in particular to the following aspects:

Ban on Forced Labor and Child Labor

Suppliers undertake not to practice any form of forced or child labor. ATT is guided by the definition of child labor based on the standards of the International Labor Organization (ILO). If a local law stipulates a higher legal minimum age for workers or longer compulsory education, the higher age applies.

Ban on Discrimination and Unequal Treatment

Suppliers undertake to not to discriminate against age, gender, color, ethnic or social origin, sexual identity, disability, religion or political opinion.

Exercising Employee Rights

Suppliers undertake to comply with the applicable laws and regulations for the protection of employees and to guarantee that employees can actively exercise their rights.

Working Hours and Remuneration

Suppliers undertake to comply with the applicable laws and regulations on the limitation of working hours and the granting of rest periods, rest breaks and vacation. Furthermore, the suppliers undertake to pay their employees in accordance with the applicable laws and regulations and to guarantee them equal remuneration for equivalent work. Conflict Minerals Suppliers undertake to comply with the applicable laws and regulations on conflict minerals. If products manufactured and/or delivered by the suppliers contain tin, tantalum, tungsten or ores thereof, or gold, ATT must be notified immediately without being asked to do so.

3. Occupational Safety



Suppliers undertake to comply with the applicable occupational health and safety regulations and will ensure a safe and healthy working environment in order to maintain the safety and health of employees, to protect third parties, and to prevent accidents, injuries and work-related illnesses.

Finally, suppliers undertake to train their employees appropriately on all occupational health and safety topics – in a language they understand.

4. Other Compliance Aspects



Suppliers undertake to act lawfully and to maintain integrity in business transactions. This includes in particular the following topics:

Fair Competition

Suppliers undertake to conduct themselves fairly in competition and to comply with the applicable competition regulations, in particular antitrust laws, and to ensure that neither their services nor their goods violate the property rights of ATT and/or third parties. Price agreements with competitors, market sharing with competitors, and the abuse of a dominant market position through price discrimination and other conduct are not tolerated in particular.

Non-Granting and/or Receipt of Improper Advantages

Suppliers shall ensure that politicians (including their family members and relatives), authorities or authority members, business partners or their employees (including ATT employees) or authority members are not given any improper advantages of any kind, either directly or indirectly. Suppliers undertake to ensure that their employees also do not demand or accept any improper advantages. An advantage is improper if, from ATT's perspective, its nature and scope are likely to influence the actions and decisions of the recipient.

Ban on Money Laundering

As a supplier of ATT, make sure there is compliance with the applicable laws and regulations on the prevention of money laundering, and that the use of cash in business transactions is avoided whenever possible.

Safeguarding Trade Secrets

Suppliers undertake to ensure that business information, namely technical, financial or competition-related information, is always handled in confidence and in accordance with any non-disclosure and confidentiality agreements. Suppliers are required to take appropriate precautions to protect such information.

Import & Export Controls

Suppliers agree to comply with all applicable export controls, sanctions, customs laws and regulations, including applicable trade restrictions, embargoes and other constraints on the import and export of goods, services and information. Suppliers undertake to ensure in particular that they themselves, their economic beneficiaries, all their representatives and other subcontractors employed by them are not listed as a sanctioned company and/or person on one of the applicable sanctions lists.

5. Environmental Obligations



Suppliers undertake to comply with the applicable environmental laws, environmental regulations and environmental standards. Insofar as environmental laws, environmental regulations and environmental standards contain reporting or other cooperation obligations for suppliers, the latter will comply with these reporting or other cooperation obligations on their own initiative, in full and within prescribed deadlines. Even in the

absence of corresponding statutory obligations, suppliers will provide support to ATT promptly at its request to the best of their ability.

ATT expects its suppliers in the supply chain to set up adequate hazardous material management and to continuously work to avoid hazardous materials in products and to reduce detrimental environmental impacts.

6. General Regulations



In the event of suspected violations of the standards and regulations laid down in the Supplier Code of Conduct and to secure the supply chain, suppliers agree to ATT performing audits to check compliance with the Supplier Code of Conduct, in particular on the supplier's factory premises, at their business premises and in their commercial buildings, during normal business hours with reasonable advance notice of at least 14 working days. ATT is authorized to perform an audit at the supplier's premises at least once a year.

Suppliers are obligated at the request of ATT to provide information and grant access to documents required by ATT to exercise the rights transferred to them by way of this Supplier Code of Conduct. The obligation also extends to information about affiliated companies, as well as subcontractors, insofar as the company obligated to provide information has the information available, or is able to obtain the requested information due to existing legal connections.

Any violation of the provisions of this Supplier Code of Conduct by a supplier is deemed a breach of essential contractual obligations and gives ATT the right, but not the obligation, to

take appropriate measures (e.g. audit with cost implications, termination of the business relationship, contract termination, etc.). Suppliers undertake to ensure that their employees comply with the requirements of this Supplier Code of Conduct and take all necessary precautions for the implementation of the requirements.

Furthermore, ATT suppliers are required to oblige their subcontractors to comply with and implement the requirements of this Supplier Code of Conduct.