



Global Supplier Code of Conduct

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1 Introduction

As a global organisation spanning the USA, UK and India, we seek to be class leading in our dealings with customers, suppliers and our employees. This Global Supplier Code of Conduct (the “Code”) sets out the minimum standards of behaviour and practices we require from our suppliers. We expect our suppliers to adhere to this Code in addition to the provisions of any Terms and Conditions agreed between the Bromford Group comprising of Bromford Industries Ltd, AeroCision LLC, AeroCision AeroComp Pvt. Ltd, Accrofab Ltd and Numet Machining Techniques Inc. (collectively known as “Bromford”) and the supplier.

In order to do business together, we expect all our suppliers to be ethical, responsible and to fully comply with all applicable laws and regulations.

At Bromford we have a core set of values ‘RISE’; we will operate with Respect, act with Integrity, ensure Safety and deliver Excellence. As a supplier of Bromford we ask of your support and that of your own supply chains to ensure these core values are achieved.

1.1 Purpose

This Global Supplier Code of Conduct specifies the minimum standards of behaviour Bromford requires of our suppliers. The purpose of this document is to communicate Bromford’s expectations to the global supply chain; it is available to view and can be downloaded from www.bromfordindustries.co.uk.

Suppliers are required to adhere and comply with the standards set out in this document.

1.2 Content, Scope & Applicability

This Global Supplier Code of Conduct is applicable to all suppliers and partners who supply product or services related to Bromford purchase orders. Suppliers are expected to cascade these standards to their own suppliers in order to ensure alignment across the supply chain.

2 Operate Safely

All suppliers must make proper provision for the health, safety and welfare of their employees, contractors and visitors. We expect suppliers to comply with legal and industry requirements and seek to implement best practice in their industries.

2.1 Health, Safety & Environment (HSE)

Suppliers are expected to be committed to managing HSE risks and to proactively protect the health, safety and welfare of their employees, contractors and visitors and those in the community who may be affected by their activities.

As a supplier to Bromford it is expected you demonstrate compliance with the minimum standard of environmental practises, applicable laws, and regulations. We actively encourage suppliers to hold ISO 14001 certification or an equivalent environmental standard for your country of origin, as well as adopting a health and safety management system: for example, Occupational Health & Safety Management BSI ISO 45001 or equivalent.

2.2 Responsible Sourcing

Suppliers must provide Bromford with products made from materials, including constituent materials that are sourced responsibly and verified as 'conflict free' in accordance with The Organisation for Economic Co-operation and Development guidelines.

Suppliers must provide Bromford with supporting data on their supply chain of minerals when requested. If the material supplied is indeterminable or otherwise unknown, the supplier must commit to either attaining the appropriate certifications or to commit to the phase out of that material.

3 Operate Ethically

We treat all our customers, suppliers and partners with fairness and honesty. We expect suppliers to demonstrate these same behaviours and will only engage with suppliers whose values and behaviours meet high ethical standards.

3.1 Working with our Customers, Suppliers & Partners

Suppliers must only engage with employees, agents, consultants, representatives, distributors, contractors, suppliers and joint venture partners who meet ours and your standards regarding reputation and conduct.

3.2 Conflicts of Interest

Suppliers must conduct your business free from conflicts of interest or mitigate appropriately any such conflicts if they arise.

3.3 Accurate Business Records

Suppliers must ensure they control documentation and records relating to Bromford product and ensure they comply with the following requirements:

- 3.3.1 Suppliers must provide access to documentation / records upon request
- 3.3.2 All documents / records are retained until Bromford gives instruction to dispose in writing
- 3.3.3 All documents are retrievable on request within 24 hours
- 3.3.4 All documents are written in the English language or dual language
- 3.3.5 Any handwritten amendments to records shall be dated and signed in ink with the original information being legible after the change
- 3.3.6 Ensure that all documents / records are suitable stored to prevent unauthorised or fraudulent use

3.4 Modern Slavery & Human Rights

Suppliers are required to comply with applicable child labour laws and employ only workers who meet the applicable minimum legal age requirements in their countries of operation. Suppliers must ensure any employees under the age of 18 years are not to be involved in any work that is hazardous or likely to have a negative impact on the employee's physical or mental development.

Suppliers must refrain from using any form of involuntary labour included forced, prison or debt-bonded labour.

All slavery and human trafficking laws must be complied with. Suppliers must ensure they have taken steps to ensure their business operations are free from slavery and human trafficking practices, both internally and within their supply chains.

3.5 Pay & Benefits

Suppliers must as a minimum, comply with all national regulations or legislation regarding pay and benefits. Pay and benefits should be sufficient to meet the basic needs of workers and their families.

Standard working hours must not exceed legal limits and over time must not exceed the maximum allowed by law.

3.6 Diversity & Equality

Suppliers are expected to promote equal opportunities for all regardless of age, race, religion or belief, disability, sex, sexual orientation, gender reassignment, marriage or civil partnership, pregnancy or maternity.

Harassment or discrimination towards employees, including all forms of physical, verbal or psychological abuse must not be tolerated.

4 Act with Integrity

High standards of ethical behaviour and compliance with laws and regulations are essential to protecting the reputation and long-term success of our business. We expect suppliers to behave ethically, to comply with legal and industry requirements and seek to implement best practices in their industries.

4.1 Anti-bribery & Corruption

Suppliers must conduct business honestly, fairly and free from any bribery or corruption.

Suppliers to Bromford must only offer gifts or hospitality in an open and transparent way and your gifts or hospitality must never be illegal. Where gifts or hospitality are offered, these should not be intended or interpreted as an attempt to improperly influence business decisions.

Suppliers must not offer or make facilitation payments.

4.2 Proprietary Information

Any information, including commercial or technical information, received through business dealings with Bromford must be kept strictly confidential and never used for individuals' personal gain.

Suppliers must use appropriate nondisclosure or confidentiality agreements to protect our confidential and proprietary information.

4.3 Export Controls & Import Regulations

Suppliers must comply with all relevant export control legislations when exporting goods or technology and shall plan for and obtain all necessary authorisations and permits to ensure timely and compliant delivery of their products.

4.4 U.S Government Procurement

Suppliers providing products or services for U.S military applications must always follow the U.S Government's rules for competing fairly, honour restrictions applying to U.S Government employees (e.g. receipt of gifts and employment), deliver products and services that conform to specifications, laws and regulations, adhere to government accounting and pricing requirements, claim only allowable costs, ensure the accuracy of data submitted and comply with all other applicable U.S. Government requirements.

The International Traffic in Arms Regulations (ITAR) requires all manufacturers, exporters, temporary importers, brokers, and furnishers of ITAR-controlled defence articles and

services—including technical data—to register with the U.S. Department of State and obtain export licenses to stay ITAR compliant.

4.5 Competition Law

Suppliers must not share or exchange any price, cost or other competitive information or engage in any collusive conduct with any third party with respect to any proposed, pending or current business with Bromford.

4.6 Preventing the Facilitation of Tax Evasion

Suppliers must ensure that all invoices and any customs or similar documentation submitted to Bromford in connection with products or services supplied to Bromford are accurate and honest and do not take part in any action that may be viewed as tax evasion or the facilitation of tax evasion.

4.7 Zero Defects

Suppliers shall adopt a Zero Defect environment through deployment of effective systems and processes that shall focus on the elimination of defects through prevention, thus guaranteeing conformance to product specification.

5 Supplier Commitment

5.1 Communication

Suppliers must make the Bromford Global Supplier Code of Conduct available to employees in the business language of the company. The latest version is also available to view and can be downloaded from www.bromfordindustries.co.uk.

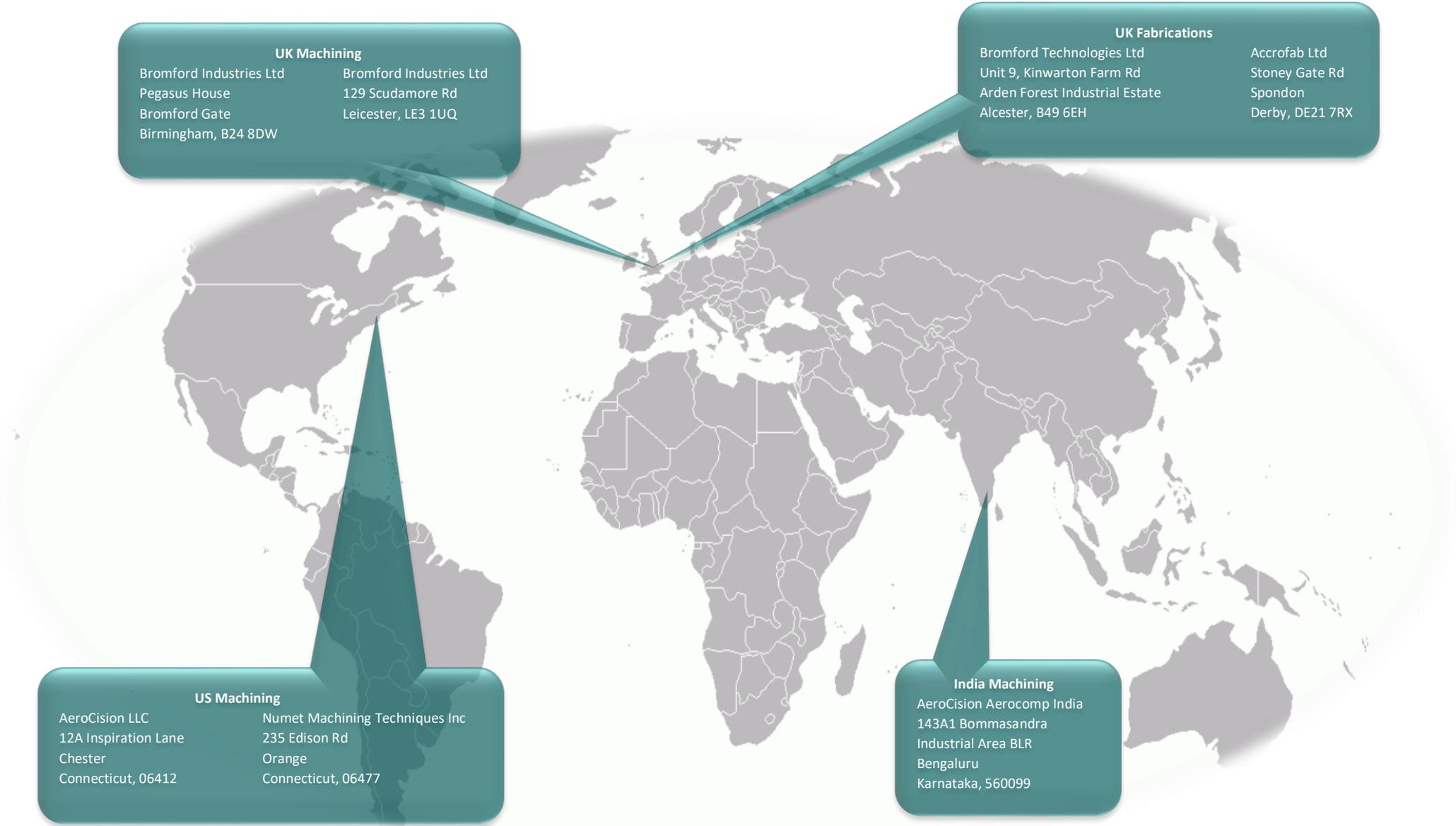
5.2 Code of Conduct Adherence

Suppliers must conform to all aspects of the Code as mandated through the Bromford Terms and Conditions of Purchase.

Bromford reserves the right to audit against compliance to this Code. Suppliers are expected to ensure that documentation is kept that demonstrates compliance with this Code.

Bromford reserves the right to terminate contracts or purchase orders in the event of material breach of the standards set out in this Code.

Suppliers are required to disseminate these standards throughout their own supply chain.



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