



Suppliers' Code of Conduct

Asia Pacific Aircraft Component Services Sdn Bhd ("APACS") is committed to high standards of ethics and business conduct. We require our suppliers to not only comply with laws and regulations, but also integrate principles of sustainable development into all areas of their business. To this end, this Code of Conduct ("Code") sets out a non-exhaustive list of ethical and business conduct requirements that we require all our suppliers to comply with.

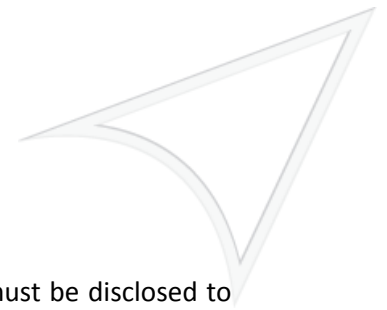
This Code may be amended from time to time and the latest version is available at www.apacs.aero. This Code of Conduct does not create any binding obligations on APACS.

1. Compliance with Laws and Regulations

- 1.1.** Suppliers' business operations, as well as all products and services supplied to APACS, must fully comply with the laws and regulations of the countries where suppliers' operations are based as well as where goods and services are provided to APACS.
- 1.2.** All financial and business records must be accurately maintained in accordance with applicable laws and regulations, as well as generally accepted accounting principles.
- 1.3.** Fair competition must be practiced in accordance with local laws. Activity that restricts competition must be avoided. Commercial decisions, including prices, terms of sale, division of markets and allocation of customers, must be made independent of understandings or agreements with competitors.
- 1.4.** Suppliers must respect the privacy of personal information of our employees and business partners and comply with all applicable laws and regulations on data protection.
- 1.5.** Suppliers must not trade in the securities of APACS or any other company either directly or through an intermediary while in possession of inside information relating to APACS or the other company.
- 1.6.** Suppliers must comply with all applicable laws and regulations when importing and exporting products, services, technology, and information.

2. Ethics and Conflict of Interest

- 2.1.** Suppliers must comply with the Singapore Prevention of Corruption Act, the UK Bribery Act, the US Foreign Corrupt Practices Act, and any other anti-corruption and anti-bribery laws in countries where they operate.
- 2.2.** Without prejudice to paragraph 2.1, Suppliers must conduct their business with integrity, transparency and honesty. They must not engage in any form of fraud, corruption, bribery, extortion or other behaviour involving the improper receipt of offer of benefits.



- 2.3. Any situation that has actual, perceived or potential conflict of interest must be disclosed to APACS.
- 2.4. Any information used by suppliers in their business relationship with APACS that is either not public and/or proprietary must be protected against loss and infringement. Any disclosure or use of such information other than for officially stated purposes must first be authorised by APACS.
- 2.5. 2.5. Any form of relationship with a competitor, distributor, supplier, or any other entity with which APACS has a business relationship must not interfere with the provision of products and services to APACS and should demonstrate high standards of ethical business behaviour.

3. Workplace Health, Safety and Quality

- 3.1. Suppliers must have in place health and safety protection policies and management systems to provide a secure working environment. They must be designed to promote the general health of employees and reduce work-related injury and illness. For example, protective equipment and tools must be provided and replaced/ maintained regularly.
- 3.2. The safety of all products and services must be ensured through appropriate policies, implementation and monitoring.
- 3.3. Policies and management systems must be developed to ensure that the quality of all products and services are as specified in the supply agreement.

4. Environment

- 4.1. Local environmental laws and practices such as those pertaining to waste disposal, air emissions and pollution must be complied with. Suppliers must endeavour to minimise the impact of their operations on the environment.
- 4.2. Environmental management is a key parameter that APACS looks at when selecting its suppliers.

5. Labour Standards

- 5.1. Suppliers' employees must not be subjected to discrimination based on race, national origin, ethnicity, religion, gender, age, marital status, sexual orientation, disability or any other reason.
- 5.2. All of suppliers' employees must meet the local legal minimum labour age.
- 5.3. Forced, coerced, bonded, indentured, involuntary prison labour or otherwise must not be used by suppliers.



- 5.4. Suppliers' employees' working hours, including considerations for voluntary overtime work, and the granting of leave of any form, must be in accordance with applicable local and/or national laws.

6. Subcontractors and Other Service Providers

- 6.1. Suppliers' subcontractors and service providers must also adhere to the principles set out in this Code of Conduct.
- 6.2. Suppliers must pay their subcontractors and service providers accurately and promptly.

7. Communication, Documentation and Inspection

- 7.1. Suppliers' employees must understand the requirements of this Code of Conduct, which must be made available in the local language where necessary.