

# Code of Conduct

AES is committed to ensuring that all business activities comply with all applicable laws and regulations, business ethics standards and principles, as well as to developing a culture of accountability, integrity and sustainability.

This Code sets out all the rules of conduct to which AES commits itself and all business partners. Every business partner must conduct his or her business in accordance with this Code of Conduct. Business partners are also expected to pass on these principles within their own supply and service chain and to go beyond the legal requirements to assume social and ecological responsibility and act ethically.

## § 1 Compliance with the Law

1.1 All applicable laws and regulations must be complied with, including all local laws and regulations in all countries in which business activities are carried out.

1.2 In particular, any actions that could constitute circumvention of the law must be avoided:

- Transparent disclosure of all relevant contractual terms and clauses.
- Avoiding sham transactions or fiduciary relationships that merely serve to circumvent legal regulations.
- Ensuring that all business transactions comply with the applicable legal provisions and are not intended to circumvent them.
- Regularly review and adjust internal policies and procedures to ensure compliance with legal requirements.
- Violations of this requirement may result in legal consequences, including, but not limited to, claims for damages and criminal prosecution.

## § 2 Human Rights

All business must be conducted in a manner that respects human rights by treating its own employees and those of its business partners with respect and dignity and promoting fair working conditions. Where potential and actual human rights impacts associated with business activities and relationships are identified, take appropriate steps to mitigate such risks, ensure that business activities do not cause or contribute to human rights abuses, and remedy any adverse impacts directly caused or contributed to by their activities or relationships.

### 2.1 Child Labour

It must be ensured that no child labour is used in the performance of business activities. The term “child” means any person under the legal minimum age for employment in the country in which the activity is carried out and/or under the minimum employment age defined by the International Labour Organization (ILO), whichever is higher. All employees under the age of 18 must be protected from performing activities that are potentially hazardous or that may jeopardize their physical or mental health and their social, spiritual or moral development.

### 2.2 Modern Slavery

All work must be carried out voluntarily by the employees. Forced labour, work in debt bondage or as indentured labour or prison labour are not accepted in any way. This also applies to the smuggling of people. Each employee is expected to receive a written employment contract, in a language that the person concerned understands, clearly stating their rights and obligations with regard to wages, working hours, benefits and other terms and conditions of employment. No form of proof of identity (passport, work permit,

etc.) may be withheld or such documents destroyed or access to them denied in the course of employment unless required by applicable law. Employees may not be required to pay fees, recruitment costs or a deposit, either directly or indirectly, as a condition of employment. The right of employees to terminate their employment after a reasonable period of time must be respected. Employees have the right to receive the full salary to which they are entitled. The right of employees to leave the workplace at the end of their shift (see also wages, additional benefits and working hours) must be respected.

## § 3 Working Conditions

### 3.1 Harassment and Bullying

Employees must be provided with a working environment free from physical, psychological, sexual or verbal harassment, intimidation or other abusive behaviour.

### 3.2 Diversity and Inclusion

A diverse and inclusive work environment is to be promoted in which employees are treated with dignity, respect and fairness regardless of race, colour, religion, gender, age, ethnic or national origin, disability, sexual orientation or preference, gender identity, marital status, nationality, political orientation or other personal characteristics. Employees and applicants must be offered equal opportunities in terms of non-discriminatory employment and all anti-discrimination laws and regulations must be complied with. Ensure that employment, including hiring, compensation, benefits, termination and retirement, is based on employees' abilities, not their personal characteristics.

### 3.3 Wages and Benefits

Employees must be paid at least the local statutory minimum wage and all legally prescribed additional benefits (e.g. overtime) must be granted.

Deductions from wages as a disciplinary measure or other deductions that are not anchored in national law are not permitted.

### 3.4 Working Hours

The standards of the International Labour Organization (ILO), which regulate working hours and rest periods, maximum consecutive working days and annual leave, must be observed. Working hours that exceed the regular weekly working hours are to be performed voluntarily and employees are to be granted at least 24 hours of continuous time off per seven-day period.

### 3.5 Social Dialog and Freedom of Association

The right of employees to organize freely and communicate openly with management about working conditions without fear of harassment, intimidation, punishment, interference or reprisal shall be respected, as shall the right of employees to exercise their legal rights of freedom of organization, including the right to join or not join an organization of their choice within the appropriate national legal framework.

### 3.6 Disciplinary and Complaint Procedures

A disciplinary process is available to deal with matters relating to employees' work, conduct or absences. A grievance procedure must be available for employees to raise concerns or problems in the workplace or to appeal against a disciplinary decision.

### 3.7 Migrant Workers

The term “migrant worker” refers to a person who will work, is working or has worked for pay in a country of which they are not a national. Guest workers shall be employed in full compliance with the immigration and labour laws of the host country.

## § 4 Integrity & Business Ethics

### 4.1 Anti-Corruption Laws

All applicable anti-corruption laws and regulations must be complied with. Corruption in any form of business agreement must be prevented and detected, including in purchase contracts, partnerships, joint ventures, offset contracts and the engagement of third parties such as intermediaries or consultants.

### 4.2 Illegal Payments

No improper payments or benefits of monetary value may be offered, promised, made, accepted or agreed to be accepted - neither in relation to public officials, political parties, and candidates for public office nor in relation to other persons. This prohibition also covers so-called “facilitation payments” or “facilitation payments” that are intended to expedite or ensure the completion of routine governmental procedures such as visa applications or customs clearance, unless it is an official, legally permissible fee for such consideration for which a receipt is issued. Payments for personal safety are permitted if there is an immediate risk to health or safety. It is prohibited to offer or consent to the receipt of illegal payments to customers, suppliers, their agents, representatives or other persons. Employees are prohibited from directly or indirectly accepting, paying and/or promising money or benefits of monetary value with the intention of exerting undue influence or gaining an improper advantage. This prohibition also applies in places where such conduct does not violate local law.

### 4.3 Fraud and Deceit

It is prohibited to obtain advantages through fraudulent action, deception or false claims or to allow another person who represents them to do so. This also includes fraudulently obtaining or stealing, or any kind of misappropriation, of property or information.

### 4.4 Competition and Antitrust Laws

No competition-distorting, formal or informal agreements may be made that lead to collusion on prices or tenders, limit supply or divide/control markets. It is not permitted to exchange existing, current or future price information with competitors. It is prohibited to participate in a cartel or in any activity that unlawfully hinders or influences competition.

### 4.5 Gifts/Commercial Favours

It must be ensured that only gifts or favours that are permitted under applicable law are offered or accepted. In addition, this exchange must not violate the rules and standards of the recipient and must be in line with standard market practice. No monetary gifts may be offered or accepted. Business partners are expected to compete solely based on their products and services. The exchange of business favours must not be used to gain an unfair competitive advantage.

### 4.6 Insider Trading

Business partners and their personnel are not permitted to use the documents or non-publicly disclosed information received in the course of their business relationship with AES as a basis for stock exchange transactions or to enable third parties to trade in shares or securities of another company.

#### 4.7 Conflicts of Interest

It is expected that any conflicts of interest or situations that give the appearance of a potential conflict of interest will be avoided. In the event of an actual or potential conflict of interest, all parties concerned must be informed. This also includes a conflict between the interests of AES and those of business partners or those of family members, friends or employees.

## § 5 Environmental and Occupational Health and Safety

### 5.1 Environmental Management

Business activities must be conducted in such a way that they actively manage environmental risks across all business processes, products and supply chains. Ecological aspects should be incorporated into the product design or service.

Furthermore, it must be ensured that the health, safety and well-being of employees, business partners, visitors and persons who could be affected by business activities are protected. Efforts should be made to prevent fatal accidents, work-related injuries and/or damage to health and to minimize safety risks. Reasonable steps shall be taken to create hygienic working conditions and to ensure that the work performance and safety of employees are not impaired by alcohol, narcotics, legal and illegal drugs.

### 5.2 Substance and Chemical Management

Suppliers are expected to provide AES with up-to-date information on environmental, occupational health and safety issues affecting their products to enable the safe use of these products throughout their life cycle. They must also work with AES to fulfil downstream requirements related to the supplier's products and/or services. In addition, suppliers are expected to anticipate future regulatory restrictions on certain chemicals/substances to ensure uninterrupted supply.

### 5.3 Sustainable Product and Process Development

AES' suppliers actively support AES' sustainability strategy and use their best efforts to develop, manufacture and provide innovative products and processes that have the lowest possible environmental impact over their lifetime. Business partners are expected to reduce the impact their operations have on climate change, improve their efficiency in the use of energy, water and natural resources, minimize waste and use hazardous materials, ship goods in appropriate outer packaging and promote the use of reusable/recycled packaging materials, such as reducing single-use plastics, and manage their air emissions responsibly.

## § 6 Product Safety

Suppliers are expected to actively support AES product safety through their own organization and processes and contribute to the regulations for continued airworthiness and safety.

### 6.1 Security Commitment

Ensure that every employee is fully committed and fully aware that the lives of passengers, airline staff and colleagues depend on them personally taking product safety seriously.

### 6.2 Safety First

The "Safety First" principle must be adhered to and promoted at all levels of the organization. Every single employee does his best to ensure that product safety is never called into question.

### 6.3 Attention and Information Exchange

Suppliers shall properly report all safety issues to AES in accordance with applicable regulations. Suppliers shall support the analysis of safety issues and the investigation of accidents/incidents in accordance with applicable regulations.

### 6.4 Safety Improvements

In accordance with the principles of the safety management system, suppliers are expected to proactively report to AES any events that could potentially affect product safety and/or the safety of the operation of the products.

## § 7 Information Security

### 7.1 Sensitive, Confidential and Proprietary Information

Information, data, systems, and intellectual property belonging to AES, customers, suppliers, and other partners must be treated as confidential and adequately protected against unauthorized access, loss, misuse, tampering, or disclosure. Information may only be used for legitimate business purposes and within the scope of the access permissions granted. Access credentials and authentication methods must not be shared or misused. Security incidents, suspected incidents, vulnerabilities, phishing incidents, or the loss of information or IT devices must be reported immediately through the designated reporting channels. All applicable internal policies regarding information security, data protection, and the protection of confidential information must be followed.

### 7.2 Intellectual Property

All applicable laws for the protection of intellectual property rights must be complied with. This also includes protection against disclosure.

## § 8 Global Trade and Export Control

### 8.1 Import

All business practices comply with all applicable laws, directives and regulations governing the import of parts, components, technical data and services.

### 8.2 Export Control

Business practices comply with all applicable laws, regulations and requirements, including U.S. and EU laws and other national regulations, and sanctions and embargoes legislation. Suppliers shall provide a true and accurate export control classification and related information and obtain export licenses or other approvals where required and provide such certification when necessary.

#### 8.2.1 No-Russia Clause

In particular, goods that fall within the scope of Article 12g of Council Regulation (EU) No 833/2014 may not be sold, exported or re-exported directly or indirectly to the Russian Federation or for use in the Russian Federation.

Ensure that this is not thwarted by third parties in the wider trade chain, including potential resellers.

Establish and maintain an appropriate monitoring mechanism to detect

detect conduct by third parties further down the supply chain, including potential resellers, that would defeat the purpose of this Article 8.2.1.

### 8.3 Responsible Procurement of Raw Mineral Materials

The laws and regulations applicable to the direct or indirect procurement of critical materials and minerals from conflict areas must be complied with (if they are contained in the products purchased). These minerals include “conflict” minerals (tin, tungsten, tantalum and gold), rare earths and other minerals or metals (e.g. bauxite, cobalt, titanium, lithium).

Business partners shall support efforts to end the use of materials from conflict areas that directly or indirectly contribute to the financing and support of armed groups and/or commit serious human rights violations. Suppliers are expected to exercise due diligence and, upon request, provide AES with evidence of their sources and chain of custody certification for these mineral raw materials and advise AES if there are potential doubts about the origin and/or their production. If the proven chain of custody of the material is “untraceable” or otherwise unknown, the supplier is expected to either obtain the necessary certificates or cease using the source of the mineral raw material.

### 8.4 Counterfeit Components

Effective methods and processes suitable for business operations should be developed, implemented and maintained to minimize the risk of counterfeit parts and materials being supplied. Effective processes should be in place to detect report and remove counterfeit parts and materials from circulation to prevent them from re-entering the supply chain. If counterfeit components and/or materials are detected or suspected, the recipients of the components and/or materials concerned must be informed immediately.

### 8.5 Tax Payments

All applicable tax laws and regulations must be complied with and openness and transparency towards the tax authorities must be ensured. Under no circumstances may taxes be evaded intentionally and illegally or may evasion by third parties be facilitated. Effective processes and controls must be put in place to prevent or assist in tax evasion and provide for appropriate training, support and whistleblowing procedures to ensure effective implementation by employees and to enable them to report any suspicions.

### 8.6 Invoice Procedures

It is expected that fair and appropriate payment procedures are in place and that uncontested, proper invoices are paid on time and in accordance with the agreed payment terms and applicable law.

## § 9 Maintaining True Records

Records must be kept, stored and maintained for all business activities and no entry may be altered to conceal or misrepresent the underlying transaction.

Appropriate controls must be put in place to ensure that the above activities are carried out correctly and securely. All records, regardless of format, made or received to evidence a business transaction must fully and accurately document the transaction or process. The records must be retained based on the applicable retention requirements.

## § 10 Governance

### 10.1 Speak-up Culture and Protection for Whistle-blowers

Employees have access to reporting channels through which legal or ethical concerns can be reported or advice sought without fear of retaliation, including the option to remain anonymous. Punitive measures must be prevented, recognized and terminated.

#### 10.2 Consequences for Code Violations

In the event of a violation against this code, business relations, if applicable, will be reviewed and corrective measures will be initiated in accordance with the terms of the corresponding contract(s).