



Supplier code
of conduct.



Application and objectives of the code

This Supplier Code of Conduct (hereinafter referred to as the "**Code**") applies to any person or entity, including directors, officers, and employees, who provides goods or services to Soucy Enterprises, hereinafter referred to as (the "**Supplier**"). It is intended to impose on the Supplier the obligation to comply with all applicable laws, regulations, rules, directives, and standards in the locations where it conducts business, especially those related to labor and environmental law and to act with integrity and ethics at all times. Where applicable local legislation imposes less restrictive obligations on Suppliers, the latter are required to comply with the standards of this Code. Where applicable local legislation imposes more stringent obligations on Suppliers, the latter are required to comply with such laws and regulations.

At Soucy, social responsibility is part of the corporate culture and is reflected in the day-to-day actions undertaken. This Code is an extension of Soucy's Code of Ethics. It is important that our supply chain upholds the same values, which is why the Supplier must agree to comply with the requirements of this Code. The Supplier shall also require all of its suppliers to comply with this Code and shall ensure that its suppliers comply as well. The Supplier shall take all commercially reasonable steps to determine whether the business practices of its suppliers comply with the Code. Supplier's failure to comply with the Code may result in termination of its contract with Soucy.

The Code may be updated at a later date. It is the Supplier's responsibility to adhere to the most current version. This section forms an integral part of the Code. Specifically, the Supplier agrees to the following.

Employee safety at work

The Supplier must comply with all applicable labor and employment laws, laws governing relations between employers and employees as well as applicable collective agreements.

Ban of child labour

Hiring a child under the age of 15 is prohibited. Workers under the age of 18 must not perform work that violates human rights and may affect their health, safety, or education. The Supplier must also observe the rules prescribed by the International Labour Organization (hereinafter referred to as the "**ILO**") concerning fundamental rights at work, including Convention No. 138 on the minimum age to employment and Convention No. 182 on the worst forms of child labour. "**Child labour**" is defined as work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development.

Ban of forced labour

Forced labour is also prohibited. "**Forced labour**" refers to work or services provided or offered by a person, under circumstances that would reasonably lead them to believe that their safety, or the safety of someone they know, would be threatened if they did not provide or offer their work or services. It also refers to circumstances that constitute forced or compulsory labour as defined in ILO Convention No. 29 concerning Forced Labour. According to the Article 2 of the aforementioned convention, "**forced or compulsory labour**" refers to any work or service that is imposed on an individual under threat of penalty and for which they have not voluntarily offered themselves.

Health and safety

Soucy expects the Supplier to provide a safe and healthy work environment and to take all necessary measures to protect the health and ensure the safety as well as physical and psychological integrity of workers, including measures aimed at eliminating dangers to the health, safety as well as physical and psychological integrity of workers at their very source.

Harassment

The Supplier must treat employees with respect and dignity. It shall take the necessary measures to prevent and put a stop to all forms of harassment, which includes the adoption of a process that allows an employee to report any breach anonymously and without fear of reprisal. The Supplier must also investigate concerns, reports, complaints, and incidents promptly, impartially and in accordance with the principles of confidentiality to protect any employee who reports harassment.

Other work requirements

The Supplier is also required to comply with all applicable laws relating to remuneration, working hours, equal treatment, employment protection, freedom of association and temporary foreign workers.

Finally, the Supplier shall recognize that everyone is entitled to full and equal recognition and exercise of human rights and freedoms without distinction, exclusion, or preference based on race, color, sex, gender identity or expression, pregnancy, sexual orientation, marital status, age (except as provided by law), religion, political convictions, language, ethnic or national origin, social condition or disability or the use of any means to palliate such disability. The environment in which the Supplier conducts its activities must be free of all discrimination, both at the time of hiring and during employment.

Ethical business conduct

Soucy conducts its business in a fair, impartial, ethical, and proper manner and expects the Supplier to conduct its business in the same way.

Responsible mineral sourcing

The Supplier shall exercise due diligence regarding the sourcing of minerals and respect for human rights by referring to the *Organisation for Economic Co-operation and Development* (OECD) Guidelines.

International trade

The Supplier shall comply with all applicable export and import laws and regulations, such as *Export and Import Permits Act* (EIPA), as well as all applicable U.S. export control laws and regulations, including the *Export Administration Regulations* (EAR) and the *International Traffic in Arms Regulations* (ITAR). No parts, materials or services may come from embargoed countries or entities subject to sanctions.

Counterfeit parts

The Supplier shall not supply any counterfeit items to Soucy and shall have a risk mitigation process in place for such items. The Supplier shall also provide Soucy with evidence of its risk mitigation process upon request. Soucy has the right to audit and inspect the

processes at any time before or after the Supplier delivers goods to Soucy and to require modifications to the processes to comply with its customers' standards.

Conflicts of interest

The Supplier shall avoid any situation in which its own interests might be favored at the expense of Soucy's interests, as well as any situation in which the appearance of a conflict of interest might arise. Any such conflict or appearance of a conflict must be promptly reported to Soucy.

Fair competition and antitrust laws

The Supplier shall conduct its business in accordance with the principles of fair competition and comply with all applicable competition and antitrust laws.

Confidential information and intellectual property

The Supplier shall protect any information disclosed to it by Soucy, whether in oral, written, graphic, or any other form, which may reasonably be understood to be confidential, and which may be designated as confidential information, proprietary information, or a trade or industrial secret (hereinafter referred to as the "**Confidential Information**").

This may include, but is not limited to, any form of intellectual property, technical, manufacturing, commercial, financial, operational, administrative, marketing, or economic information, data, documents, technical drawings, patents, materials, products, technical skills, trademarks, and non-public information relating to suppliers and customers. The Supplier shall implement controls, safeguards and security measures for Confidential Information that are appropriate and proportionate to its sensitivity.

The Supplier may only receive, use, disseminate and access Confidential Information as explicitly authorized by Soucy, and only for the purposes for which such was provided to the Supplier. Unless authorized by Soucy, the Supplier shall not be entitled to use Soucy's intellectual property, trademarks, images, or other copyrighted content. The Supplier shall delete and refrain from using any Confidential Information not intended for its use.

Personal information protection

The Supplier shall collect and process personal information in accordance with applicable laws and regulations and is required to notify the Privacy Officer at PRP@soucy-group.com if it becomes aware that personal information has been compromised.

Cybersecurity

As a global company, Soucy must meet the highest standards of information protection, particularly with regard to unauthorized access or leakage. More specifically in the defense sector, Soucy must comply with several provisions of U.S. laws and regulations, including the *Federal Acquisition Regulation* (FARS) and the *Defense Federal Acquisition Regulation Supplement* (DFARS). These regulations require specific control measures to protect information collected, developed, received, transferred, stored, or destroyed as part of a defense contract. This information may include technical drawings, simulation data and research engineering data. The Supplier may also need to have its control measures and cybersecurity maturity level assessed and certified. This certification is called *Cybersecurity Maturity Model Certification* (CMMC). Where applicable, the Supplier is required to strictly comply with those requirements.

Gifts and gratuities

The Supplier must not offer gifts to Soucy employees, even if they are of little value, nor accept gifts from its suppliers to ensure impartiality in its decisions.

Corruption, improper payments, and illicit commissions

Bribes, illicit commissions, and other illegitimate payments are strictly forbidden, even if permitted by current legislation. No offer or acceptance of such payments is permitted.

Accuracy of bookkeeping

The Supplier shall keep its books, accounts, and records in such a way that they accurately and completely reflect the company's operations and provide supporting documentation.

Environmental responsibility

Soucy's strategic environmental vision is focused on sustainability and the conservation of resources and energy in the management of its activities, including procurement. The Supplier's activities must align with this vision, as it is essential that all participants in the supply chain contribute to environmental protection for future generations. The Supplier is required to demonstrate environmental responsibility in the places where it operates and comply with all applicable environmental laws and regulations. In particular, certain laws and regulations prohibit or restrict the use of certain substances and require suppliers to provide information on the substances contained in their products. Soucy may ask the Supplier to certify its compliance with these laws and regulations, and to provide a list of the substances contained in its products, as well as certain information to assess its environmental performance (e.g. CO2 emissions, etc.).

Other responsibilities

Transparent supply chain links

If a problem affects its activities, Soucy may request documents, conduct on-site audits, review and approve corrective action plans and ensure their implementation. At Soucy's request, the Supplier must produce appropriate documentation proving that its supply chain complies with this Code.

Reporting infringements

The Supplier may confidentially ask questions, make comments, or report a breach of this Code at legal@soucy-group.com.