



FUTABA

Supplier Code of Conduct

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Futaba Czech, s.r.o.

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I. Introduction

Futaba Czech s.r.o. (hereinafter referred to as "FUTABA") is committed to responsible growth through innovation and collaboration while upholding the highest standards of environmental responsibility, social equity and well-established governance. This commitment to Environmental, Social and Governance (ESG) principles extends to all aspects of its operations, including its global supply chain. FUTABA also recognizes cyber security and information security as fundamental enablers of responsible business, resilience, and trust across its operations and supply chain.

II. Supplier Code of Conduct

This Supplier Code of Conduct applies to all suppliers and their subsidiaries, joint ventures, and affiliates (collectively "Suppliers") and to their subcontractors and workers who provide services and/or goods to FUTABA. Suppliers and their subcontractors must also comply with all applicable laws and regulations.

Suppliers may contact FUTABA's business representative to ask questions about the Suppliers Code of Conduct. Suppliers are encouraged to report any allegation of breaches of the Suppliers Code of Conduct sending email to whistleblowing@fcz.cz. FUTABA will not retaliate against anyone for report concern in good faith.

FUTABA is entitled to terminate the relevant contract(s) with the Supplier if the Supplier Code of Conduct is violated and the necessary corrective actions are not implemented within reasonable time.

1. Labour and Human Rights

FUTABA is committed to upholding and promoting internationally recognized human rights across its operations and supply chain. We expect all suppliers to respect the dignity, rights, and well-being of their employees, and to comply with applicable laws, ILO Core Conventions, and the UN Guiding Principles on Business and Human Rights.

a. Child Labour and Young Workers

Child labor is strictly prohibited. Suppliers shall not accept labor by children who have not reached the legal minimum age for employment prescribed in local laws and regulations. Suppliers shall obtain records to legally prove the date of birth for all their employees and maintain a register of these documents.

The Supplier Code of Conduct does not prohibit participation in legitimate workplace apprenticeship programs that comply with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138. Supplier must ensure that young workers are employed only in accordance with all applicable laws and are strictly protected from hazardous work, excessive working hours, night shifts, and any tasks that could jeopardize their health, safety or development.

b. Forced Labour

All employment must be **freely chosen**. Suppliers must ensure that all work must be voluntary, and employees can leave work or terminate their employment with reasonable notice. Suppliers shall not tolerate forced labor by means of violence and threat or by entrapment of debt, or any other form of modern slavery (i.e. slavery, servitude and forced or compulsory labour) and human trafficking.

Suppliers must not retain employees' passports, ID cards, or work permits, and must not charge recruitment fees or impose unreasonable deductions or financial penalties. Employees must not be charged excessive recruitment or placement fees, or any other unjustified costs as a condition of employment.

c. Women's rights

Suppliers shall ensure compliance with applicable laws and international labour standards protecting the rights of women. Any form of gender-based discrimination, harassment, or violence is strictly prohibited. Women must have equal access to employment, training, promotion, and fair compensation. Suppliers shall protect maternity rights and ensure that workplace policies and practices do not adversely impact women's safety, dignity, or equal participation in the workforce.

d. Anti-discrimination

Suppliers must prohibit all forms of discrimination based on race, ethnicity, nationality, gender, age, religion, disability, sexual orientation, gender identity or expression, political opinion, social origin, or family status in all employment-related decisions, including recruitment, promotion, compensation, access to training, and termination.

Suppliers shall foster a culture of diversity and inclusion, recognizing it as a driver of innovation, employee well-being, and business growth.

e. Ethical recruitment

Supplier must ensure that all recruitment activities – whether performed directly or through third-party agencies – are fair, transparent, and based solely on qualification, competence, and ability to perform the job. Recruitment fees must never be charged to workers, and no form of forced, bonded, or involuntary labour is permitted. Suppliers must verify workers' legal right to work, provide clear employment terms in a language workers understand, and ensure equal opportunities for all applicants regardless of gender, age, nationality, ethnicity, disability, religion, or other personal characteristics. All hiring must comply with applicable labour laws and international standards.

f. Fair Treatment and Prevention of Harassment

Promote a safe, inclusive, and fulfilling work environment. Respect the individuality and dignity of each employee, strictly prohibit all forms of forced labor, child labor, and human trafficking, and foster a culture of equality, well-being, and continuous development.

Suppliers must strictly prohibit any form of harassment, abuse of authority, bullying, or degrading treatment. This includes sexual harassment, verbal abuse, intimidation, and workplace coercion.

g. Freedom of Association

Suppliers must respect employees' rights to freely associate, join trade unions, or engage in collective bargaining, without fear of retaliation or discrimination. Constructive dialogue with employee representatives should be encouraged to resolve workplace matters.

h. Working Hours

Suppliers must ensure that working hours, overtime, rest periods, and leave entitlements comply with all applicable local laws and internationally recognized labor standards.

Overtime should be voluntary, paid at legal premium rates, and not exceed legal or industry norms. Employees must receive appropriate daily and weekly rest, as well as paid leave and holidays, supporting health, safety, and work-life balance.

i. Wages and Benefits

Suppliers must pay all employees at least the legal minimum wage, provide all legally mandated benefits, and ensure wages are paid on time and at least monthly and transparently.

In addition to their compensation for regular hours of work, employees shall be compensated for overtime hours at the premium rate required by applicable laws and regulations. Suppliers should not use deduction from wages as a disciplinary measure.

Suppliers shall provide accident insurance to all workers. Insurance shall cover medical treatment for work related injuries and illnesses.

j. Right of Minorities and Indigenous Peoples

Suppliers must respect and protect the rights of minorities and Indigenous peoples, including their cultural heritage, traditions, and customary land and resource rights. Suppliers must avoid any actions that could result in discrimination, marginalization, or adverse impact on those groups and must engage with affected communities in a transparent and respectful manner.

k. Land, Forest and Water Rights and Forced Eviction

Suppliers must respect the legitimate land, forest, and water rights of local communities and Indigenous people, and other stakeholders, must not participate in or benefit from forced evictions or land grabbing, or any form of involuntary displacement. Any land use or expansion must be conducted transparently and in consultation with affected stakeholders, ensuring that free, prior, and informed consent principles are upheld.

l. Use of Private or Public Security Forces

Suppliers shall ensure that any private or public security forces engaged in their operation act in compliance with applicable laws and with full respect for human rights. Security personnel must be trained accordingly and use force only when lawful, proportionate, and strictly necessary. Suppliers must prevent, monitor, and promptly address any incidents of misconduct, abuse, or unlawful coercion by security forces.

2. Health and Safety + Wellbeing

Suppliers must have a documented Health and Safety policy that complies with all applicable local and international standards as well as relevant industry requirements. Based on the principle “Safety First,”, suppliers shall build safe and healthy working conditions for employees and ensure that all products and services comply with relevant safety laws and regulations.

a. Occupational Health, Safety and Hazard Prevention

Suppliers must provide a safe, hygienic, and healthy working environment, preventing occupational accidents and illnesses. This includes proactive health and safety risk assessments, training, and the provision of appropriate personal protective equipment.

b. Emergency Prevention, Preparedness and Response

Suppliers must identify, assess and prevent emergency situations and events. Emergency plans and response procedures must be prepared to minimize their potential impact.

Workers shall have competence on how to handle emergencies and know the risk associated with their position prior to performing their tasks. They shall receive training that allows them to fulfil their tasks.

c. Incident Management

Suppliers must establish procedures and systems to manage, track and report occupational injury and illness. Workers should be encouraged to report all injury and illness cases. Suppliers shall investigate reports and implement corrective action.

d. Working conditions

Suppliers must provide their employees with clean, hygienic and well-maintained working environment with adequate light, ventilation and if necessary, with heating or air conditioning. Clean toilet facilities and unlimited drinkable water, both free of charge, must be available to all employees within a reasonable distance of their work area.

3. Environment

FUTABA is committed to sustainable development and minimizing environmental impact throughout its operations and supply chain. Suppliers are required to actively work to minimize their negative impact on the environment through Greenhouse Gas emission reduction, responsible resource use, pollution prevention and waste reduction measures.

a. Environmental Management System

Suppliers must establish, operate, and continuously improve an effective environmental management system to ensure legal compliance with all applicable local and international environmental laws and regulations. The system should incorporate continuous measurement and monitoring of environmental performance. It should also enable the integration of environmental

considerations into all business activities, promoting harmony between industrial activity and the natural environment.

b. Reduction of Greenhouse Gas (GHG) Emissions

Suppliers shall monitor and reduce greenhouse gas emissions from operations and promote energy efficiency to support global climate action. They are required to contribute to the EU Green Deal targets and the transition to a decarbonized society by minimizing environmental footprint and implementing carbon reduction strategies.

Suppliers must share regularly status on GHG emissions, providing FUTABA with necessary data to calculate its carbon footprint, and progress on their reduction. Where necessary they must collaborate on joint sustainability goals.

c. Substance of Concern Management and Restriction

Suppliers should properly manage and safely store chemicals that pose environmental or health risks. They must comply with REACH and local chemical regulations and avoid the use of prohibited substances in products and processes. Suppliers are required to maintain transparent records and reporting of regulated substances to the authorities and customers, as required by law.

d. Resources Efficiency and Waste Management

Suppliers shall actively promote energy-saving technologies, efficient use of raw materials, and eco-conscious product and packaging design. They shall support principles of circular economy throughout the product life cycle. They are required to ensure responsible waste management, in compliance with local and EU regulations, and promote recycling and reuse to reduce landfill and environmental impact.

e. Pollution Prevention (Air, Water, Soil)

Suppliers must comply with all local relevant environmental laws and regulations on pollution control including air emissions, wastewater discharge, and soil contamination. Continuous monitoring and appropriate mitigation measures must be implemented to prevent environmental degradation and potential negative impact on people.

f. Biodiversity and Ecosystem Preservation

Suppliers shall recognize the importance of protecting biodiversity and natural ecosystems. Suppliers are expected to engage in practices that preserve local habitats, avoid deforestation, and support production methods that coexist with nature.

4. Ethics

FUTABA complies with all applicable laws, regulations, and their underlying principles, ensuring responsible and ethical corporate behavior. The same legal compliance is required from our suppliers.

a. Business Integrity

Suppliers must engage in **responsible business conduct** by upholding ethical standards and complying with all relevant laws and regulations. They shall establish and maintain internal systems such as policies, training, hotlines, and a code of conduct to ensure adherence to all relevant legal and ethical requirements.

Suppliers shall not engage in **corruption, extortion, or embezzlement** in any form as well as they shall not violate any international anti-corruption conventions, and applicable anti-corruption laws and regulations.

Suppliers shall maintain effective policies and controls to prevent **money laundering**. Suppliers must comply with all applicable local and international anti-money-laundering laws and industry requirements, conduct proper due diligence on business partners, and ensure that financial transactions are transparent and accurately recorded.

Suppliers shall conduct business in full compliance with all applicable **competition and anti-trust laws**, strictly prohibit **anticompetitive behaviour**, including cartels, collusive bidding, monopolistic practices, insider trading, and other unfair trade practices (e.g. cartel, collusive bidding). Suppliers must ensure that their commercial practices promote **fair, open, and lawful competition** and that all employees understand and adhere to relevant legal obligations.

Suppliers shall uphold full **financial responsibility** by maintaining **accurate, complete, and verifiable financial and business records** in accordance with applicable laws, regulations, and recognized accounting standards. All financial transactions must be documented transparently, retained for the required legal period, and supported by appropriate controls to ensure data integrity and prevent fraud, corruption, or other improper financial practices.

Suppliers shall not give or receive **improper benefits** or benefits that may be regarded as improper remuneration to obtain, retain or direct business or to secure any other improper advantage in the Supplier's business with FUTABA.

Suppliers should not employ or make any payments to any employee of FUTABA in connection with any transaction between the supplier and FUTABA. Suppliers should ensure that any personal or business relationship between people connected with its operations will not influence the FUTABA employee's decisions or business judgment. Suppliers shall disclose any situation that appears to **conflict of interest**, or could potentially conflict with the interests of FUTABA or its employees

b. Responsible sourcing

Suppliers shall obtain materials with consideration and care to avoid the procurement or usage of the ones which are unlawful or obtained through unethical or otherwise unacceptable means such as Conflicts minerals (i.e. 3TG = Tin, Tantalum, Tungsten and Gold), cobalt, natural rubber. Suppliers are required to collaborate in the submission of supporting documentation.

Suppliers shall implement effective controls to prevent the use, manufacture, or distribution of **counterfeit parts or materials** in any products or services supplied. Suppliers must maintain

traceability of all components, source materials only from verified and approved suppliers, and promptly report any suspected counterfeit items.

c. Disclosure of Information

Suppliers must accurately maintain any records (e.g. financial statements, business activities or structure) required by law and disclose such information transparently, accurately and in timely if it is required by the applicable regulation.

d. Whistle-blower Protection

Suppliers must establish confidential, accessible, and safe grievance mechanisms allowing employees to report misconduct without fear of retaliation, and to ensure timely investigation and resolution.

e. Community Engagement

Suppliers must encourage and participate in social contribution initiatives involving employees. Promote activities that support local community development and build strong, trust-based relationships.

f. Data Privacy, Intellectual Property and Confidentiality

Suppliers shall collect and otherwise process personal and confidential information (related to customers, business partners, employees, etc.) only through legitimate means and in accordance with applicable laws and contractual obligations. Suppliers should protect this information appropriately and limit its use to authorized purposes.

Suppliers shall protect their own intellectual property and respect that of others. Suppliers shall avoid unauthorized use, infringement, or misappropriation of third-party intellectual property.

g. Cyber Security and Information Security

Suppliers must comply with and actively enforce the requirements of applicable laws and regulations, their contractual obligations to FUTABA, and current standards in cyber and information security, with the aim of ensuring the continuous confidentiality, availability, and integrity of data, information systems, and processes of the Supplier and FUTABA.

For this purpose, Suppliers shall establish and maintain a cyber and information security management system that complies with applicable legal requirements or that is based on internationally recognized standards in the field (such as ISO/IEC 27001), and within this framework shall, among others, implement and maintain security measures that are appropriate in light of the vulnerabilities, threats, and risks to cyber and information security identified by the Supplier.

Suppliers must ensure that the above requirements are also complied with by subcontractors who may affect the cyber and information security of the Supplier or FUTABA.

5. Management System

Suppliers commit to establishing a management system designed to ensure compliance with this Suppliers Code of Conduct and applicable laws and regulations.

a. Management Accountability and Responsibility

Suppliers are required to communicate the FUTABA's Suppliers Code of Conduct to their workers and subcontractors. They must identify the representatives responsible for ensuring implementation and periodic review of the status of the Supplier's management systems.

b. Legal Requirements

Suppliers must have a process in place to ensure compliance with applicable laws and regulations.

c. Audit

Suppliers must obtain and keep records to ensure compliance with this Suppliers Code of Conduct and be prepared to provide evidence of its conformity. FUTABA can audit its supplier either directly or through a third party.