

PROCUREMENT POLICY

1. CONTEXT

ORION TECHNIK MAINTENANCE & ENGINEERING develops its activity on a global level in the aviation market, marked by high competitiveness, and acquires goods and services for its entire value chain under commercial relationships and partnerships established with suppliers and other external stakeholders.

Therefore, at ORION TECHNIK MAINTENANCE & ENGINEERING, the qualification, selection and hiring of suppliers is governed not only by compliance with technical and commercial terms and conditions, but also by compliance with this policy, the provisions of its Quality and Safety Policy and the regulatory documentation that it comprises, among other relevant ORION TECHNIK MAINTENANCE & ENGINEERING policies, as well as compliance with legislation in force in the countries where it operates, with the aim of creating value in a sustainable manner.

ORION TECHNIK MAINTENANCE & ENGINEERING is committed to disseminating its Procurement Policy throughout its supply chain, namely through the involvement of suppliers, partners or any other stakeholder, within the scope of its Procurement and Contracting activities, as per the defined in this document.

2. SUSTAINABLE COMPANY POSITION

Principle 1 – Respect for Human Rights and Working Conditions

- Ensure that child labour is not used;
- Guarantee the non-use of forced or coercive labour;
- Allow freedom of association for its workers;
- Do not allow any form of discrimination, mistreatment and harassment of its employees;
- Remunerate its employees fairly and equitably, in accordance with their skills, functions and responsibilities, in accordance with current legislation, industry standards and collective employment agreements, when applicable;
- Respect for the maximum number of weekly and overtime working hours and rest periods of its employees in accordance with current legislation and collective bargaining agreements, when applicable;

Principle 2 – Act with transparency and integrity

- Ensure and be responsible for the security, confidentiality, privacy and appropriate use of information obtained during the commercial relationship with ORION TECHNIK MAINTENANCE & ENGINEERING, including after its termination, respecting the provisions of applicable legislation and the contracts signed with ORION TECHNIK MAINTENANCE & ENGINEERING relating to the attribution of intellectual property of technologies and know-how;
- Make appropriate communication channels available to your employees so that they can internally report irregularities or illegal practices of which they are aware, which have occurred on their premises or through the company's activities, ensuring their anonymity and non-retaliation;
- Ensure compliance with all national and international legislation on bribery, corruption, extortion, money laundering, embezzlement, conflicts of interest and anti-competitive practices, including, but not limited to, facilitation payments and receipt of improper gifts;
- Ensure Financial Integrity by maintaining accurate and transparent financial records in accordance with accounting standards;
- Collaborate in on-site audits, providing the resources and documentation necessary for good execution;
- Ensure respect, protection and consultation of local communities and whenever possible promote their development in a sustainable way through employment and local investment;
- Promote the public disclosure of relevant information on sustainability performance, namely GHG emissions, water and biodiversity risks, among others, with the potential to negatively affect the environment.

Principle 3 – Assume quality as a critical success factor

- Ensure compliance with agreed quality and contractual requirements;
- Promote continuous improvement in your organization, as well as that of your partners, with a view to increasing efficiency / effectiveness in the performance of your activity;
- Ensure the training of its employees and the dissemination of its policies, procedures and objectives, throughout the supply chain;
- Develop and adopt management systems (for example, consistent with ISO) and have mechanisms for identifying, monitoring and mitigating operational risks;
- Develop conditions to generate and implement ideas, on an ongoing basis;
- Ensure the quality and sustainability of the supply chain through best market practices, audits and supplier performance assessment.

Principle 4 – Protection of the environment, people and assets

- Ensure compliance with agreed legal and contractual requirements in terms of safety, health and environment;
- Respect for people's privacy and compliance with personal data protection law;
- Ensure efficient management of energy and resources, promoting, whenever possible, the circular economy, minimizing the negative impact of activities and maximizing their positive impact;
- Ensure the correct handling of chemical or toxic products and present all necessary authorizations for this purpose;
- Obtain and maintain the necessary licenses and certifications to carry out the respective activities;
- Ensure that Cybersecurity Policies and defined processes are effectively implemented, maintained and controlled and that they comply with industry regulatory security standards.

3. COUNTERFEIT PARTS POLICY

ORION TECHNIK MAINTENANCE & ENGINEERING develops its activity on a global level in the aviation market, providing a range of products, from aircraft parts to chemical products, that our customers depend on and the safety of our products is the cornerstone of all we do.

With an increasingly complex global supply chain, we must be diligent in tracking, inspecting and managing parts, material and equipment throughout the supply chain to ensure their authenticity is not compromised.

ORION TECHNIK MAINTENANCE & ENGINEERING understands the growing impact that counterfeit, fraudulent and suspect items may pose on safety, performance and reliability. As such, we are committed to establishing relationships, processes and procedures to reduce the risk of using counterfeit parts in our products. To this end, our objectives are to:

- Ensure the detection, prevention, removal or mitigation of counterfeit, fraudulent or suspect parts from the supply chain.
- Ensure counterfeit material is appropriately reported to governments and other stakeholders, as required or prudent.
- Monitor and, where appropriate, take action related to industry alerts, government rulemaking efforts or other guidance on suspect parts, as well as participate in industry committees striving to reduce the use of counterfeit parts throughout our industry.
- Develop a strategic plan to manage long-term availability of authentic parts and part sources.
- Continually improve purchasing processes aimed at reducing the risk of procuring counterfeit parts.
- Constantly challenge our external supply chain to meet the same standard as our internal supply chain.

4. FINAL PROVISIONS

ORION TECHNIK MAINTENANCE & ENGINEERING is committed to establishing and maintaining relationships only with suppliers that respect and act in accordance with the laws, regulations and other rules applicable in the countries in which it operates, but also with the principles established in this Procurement Policy and best practices (e.g. UN Universal Declaration of Human Rights and the core conventions of the International Labor Organization (ILO) throughout its value chain, adopting measures deemed appropriate in cases where the ethical and professional conduct of suppliers and their subcontractors is questionable.

Suppliers are required to confirm their adherence to this Procurement Policy within the scope of the ORION TECHNIK MAINTENANCE & ENGINEERING Supplier Qualification Process and, in doing so, consider themselves committed to its compliance.

In case of continued non-compliance, these suppliers will be held responsible with the final consequence of losing their eligibility as suppliers of ORION TECHNIK MAINTENANCE & ENGINEERING.