

## SUPPLIER CODE OF CONDUCT

COMSYN is committed to upholding the highest standards in all our business dealings with our customers and providing high-quality products and services. Accordingly, we expect our suppliers and their directors, officers, employees, agents, representatives, and affiliates to comply with the requirements set forth in this Supplier Code of Conduct (the “Supplier Code”). This Supplier Code is not intended to be an exhaustive list of all ethical and business conduct requirements that suppliers must follow.

You must have controls, tools, and processes in place that (a) ensure compliance with applicable laws, regulations, and the requirements set forth herein; (b) facilitate prompt discovery, investigation, disclosure (to Spirit and others, as appropriate), and remediation for violations of law, regulations, and the expectations set forth herein; and (c) train your directors, officers, employees, agents, representatives, and affiliates with respect to applicable laws, regulations, and the expectations set forth in herein.

The expectations set forth in this Supplier Code are not intended to conflict with the terms and conditions of your contracts with COMSYN. If a contract requirement is more restrictive than this Supplier Code, you must comply with the more restrictive contract requirement.

### Human Rights

Suppliers must comply with all applicable laws and regulations relating to labor including, without limitation, laws relating to maximum work hours, compensation, collective bargaining, and minimum wage. We expect our suppliers to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture.

Suppliers must not use child labor, forced labor, or human trafficking practices in their performance of work. The term “child” means any person under the minimum legal age for employment where the work is performed. Suppliers must refrain from violating the rights of others and address any adverse human rights impacts of their operations. Suppliers must educate employees on prohibited activities and discipline employees that violate the law or rules, and, if working on government contracts, notify the contracting officer of violations and actions taken against employees where required by the applicable acquisition regulations.

#### ➤ Harassment

We expect our suppliers to ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.

#### ➤ Non-discrimination

We expect our suppliers to provide equal employment opportunity to employees and applicants for employment, without regard to race, religion or belief, color, sex, national origin, age, military veteran status, sexual orientation, gender identity, marital or civil partnership status, pregnancy, genetic information, disability, each as recognized by the applicable law(s), or any other characteristic provided by law.

#### ➤ Substance Abuse

We expect our suppliers to maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances. We further expect our suppliers to, at all times in the

performance of work for Spirit, comply with the applicable Department of Transportation, Federal Aviation Administration, and non-U.S. regulatory body rules governing the use of drugs and alcohol.

➤ **Retaliation**

We expect our suppliers to have a zero tolerance policy with respect to intimidation or retaliation against anyone who in good faith raises a concern, makes a report, or cooperates in an investigation in connection with the matters set forth herein.

✚ **Anti-Corruption and Conflicts of Interest**

➤ **Anti-Corruption**

Our suppliers must comply with the anti-corruption laws, directives, and/or regulations that govern operations in the countries in which they do business, such as the under The Prevention of Corruption Act 1988 (“PCA”). and associated implementing legislation. Suppliers shall not offer or pay bribes, kickbacks, or other similar payments to any person, organization, or government official to secure improper advantages. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity may not violate local law. We expect our suppliers to exert due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of agents or representatives.

Our suppliers must not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives, or others. The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is strictly prohibited. This prohibition applies even in locations where such activity may not violate local law.

➤ **Antitrust**

Our suppliers must not engage in any pricing fixing, bid rigging, market allocation, predatory pricing, or other illegal competition practices. Further, suppliers must not exchange current, recent, or future pricing information with competitors in violation of applicable antitrust or competition laws.

➤ **Gifts/Business Courtesies**

We expect our suppliers to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, our suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules or standards of the recipient’s organization, and are consistent with reasonable marketplace customs and practices.

➤ **Conflicts of Interest**

No member of **Commercial Syn. Bags Ltd.** Board of Directors or Staff shall derive any personal profit or gain, directly or indirectly, by reason of his or her participation with **Commercial Syn. Bags Ltd.** This shall also include the member’s business or other nonprofit affiliations, family and/or significant other, employer, or close associates who may stand to receive a benefit or gain. Each individual shall disclose to the Board Chair any personal interests which he or she may have in any matter pending before the organization and shall refrain from participation in any discussion or decision on such matter.

➤ **Cybersecurity Incidents**

If a supplier becomes aware of a cyber-security incident that impacts COMSYN, the security of its information, or the security of any personal data, the supplier must promptly contact the COMSYN.

## **Environment, Health, and Safety**

We expect our suppliers to operate in a manner that actively manages risks and hazards (including from regulatory non-compliance and reputational loss), conserves natural resources, and protects the environment.

We expect our suppliers to comply with all applicable environmental, health and safety laws, regulations, and directives. Suppliers should protect the health, safety, and welfare of their people, visitors, customers, and others who may be affected by their activities including the general public.

## **Import and Export**

We expect our suppliers to ensure that their business practices are in accordance with all applicable laws, directives, and regulations governing the import, export, and re-export of parts, components, technical data, and provision of services.

## **Quality**

Suppliers must take due care to ensure their work product meets Spirit's and Spirit's customers' applicable quality standards. We expect our suppliers to have in place quality assurance processes to identify defects and implement corrective actions, notify Spirit of any non-conformances in a timely manner, and facilitate the delivery of products and services with quality meeting or exceeding the contract requirements.

We expect our suppliers to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.