

**Patria**

# Supplier Code of Conduct



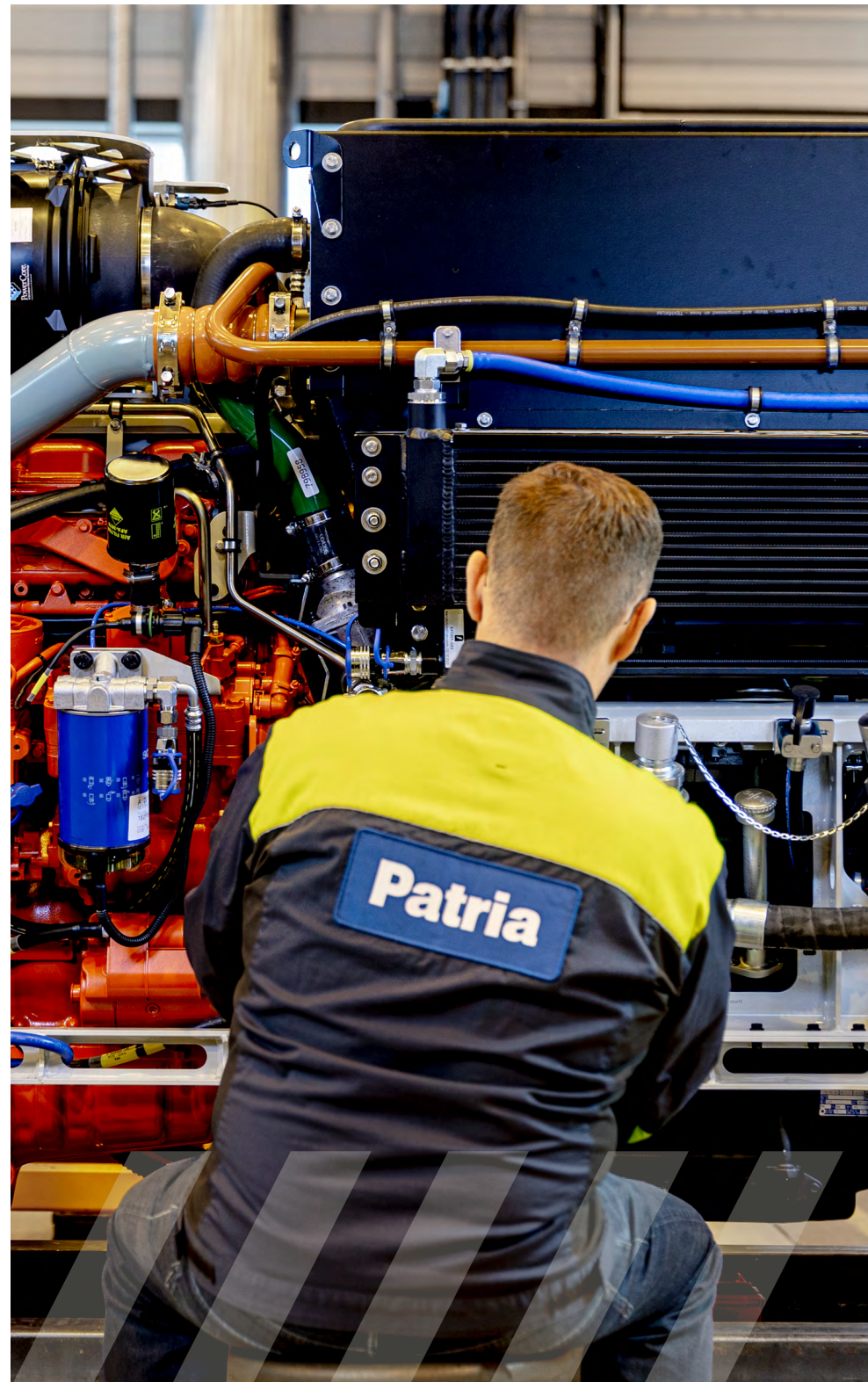
PATRIA SUPPLIER CODE OF CONDUCT

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# INTRODUCTION

- Purpose and scope of this Supplier Code of Conduct
- Expectations from our Suppliers
- Sustainability commitment
- Ensuring compliance with this Code



## Purpose and scope of this Supplier Code of Conduct

Patria's long-term success relies on responsible, ethical, and sustainable business practices across our entire value chain. We expect our suppliers to share these ambitions and uphold the principles, standards, and requirements set out in this Supplier Code of Conduct ("the Code") throughout their relationship with Patria.

This Code outlines the minimum expectations we set for all suppliers to ensure that business practices are aligned with Patria's values and commitments set forth in Patria Code of Conduct. The Code is grounded in internationally recognised standards for responsible business conduct, including the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO Core Conventions. Patria is committed to supporting the Paris Agreement through science-based climate targets.

This Code applies to all suppliers and partners that provide products or services related to Patria contracts or purchase orders.

Suppliers must adhere to this Code and the principles underpinning it and ensure that their own suppliers and subcontractors do the same.



## Expectations from our Suppliers

We expect our suppliers to uphold responsible, ethical, and sustainable business practices throughout their relationship with Patria. Recognising that supplier actions and integrity directly impact Patria's reputation, performance, and compliance, suppliers are required to conduct their operations with the strictest standards of integrity. To support this, suppliers must:

- comply with all applicable laws, regulations, and the requirements of this Code,
- maintain their own Code of Conduct or equivalent policies, communicate them effectively to employees and apply the same standards across their own value chain, including subcontractors and sub-suppliers,
- conduct sustainability due diligence and risk assessments that are appropriate for their business, operating context, and exposure to sustainability-related risks,
- provide Patria, upon request, with accurate and timely information demonstrating compliance with this Code,
- Establish accessible and effective whistleblowing or grievance channels that allow employees and suppliers to report concerns or suspected misconduct and commit to non-retaliation against anyone who raises a concern.

## Sustainability commitment

At Patria, responsible and sustainable business practices are integral to how we operate and create long-term value for our customers, partners and society. Our suppliers play a critical role in supporting these commitments. Strong and responsible partnerships are built on transparency, collaboration and continuous development. In addition to complying with the requirements set out in this Code, Patria encourages suppliers to actively support sustainable and responsible business practices by:

- developing and maintaining a sustainability approach that supports responsible environmental, social and governance (ESG) performance aligning with Patria's sustainability approach,
- engaging in relevant industry initiatives, standards and partnerships that advance responsible and sustainable practices,
- working together with Patria to promote innovation, responsible solutions and improved sustainability performance across the value chain,
- sharing knowledge and best practices that support continuous improvement and responsible business conduct throughout the industry.

## Ensuring compliance with this Code

Patria reserves the right to verify supplier compliance with this Code through dialogue, assessments, and audits. These may include self-assessments, on-site evaluations, or reviews carried out by Patria representatives or by approved third-party experts. Audits will be conducted with reasonable notice and with the supplier's consent, which shall not be unreasonably withheld.

If an assessment identifies areas of non-compliance, the supplier must take necessary corrective actions within an agreed timeframe. Patria may provide guidance where appropriate; however, suppliers remain fully responsible for meeting the requirements of this Code. Failure to implement effective corrective actions may affect the continuation of the business relationship.

# RESPECT FOR PEOPLE AND COMMUNITIES

- Health, safety and wellbeing
- Respect for human rights and fair employment practices
- Environmental sustainability
- Responsible sourcing
- Global Trade Compliance



## RESPECT FOR PEOPLE AND COMMUNITIES

# HEALTH, SAFETY AND WELLBEING

## Why

A healthy and safe working environment is essential for protecting physical health, mental wellbeing, and psychosocial safety. Safety is both a right and a shared responsibility. Each of us plays a role in maintaining and improving workplace health, safety, and wellbeing – for ourselves, for the people we work with, and for the community we build together.

## Patria's commitment

We commit to providing a safe, healthy, and productive working environment by striving for zero accidents through continuous risk assessment and proactive health and safety management. We also promote wellbeing by supporting mental health, work-life balance, and addressing issues proactively to ensure effective solutions.

## WE EXPECT OUR PARTNERS TO:

- Implement health and safety management system, or comparable system suitable for their operations and scope of services to Patria, to oversee and improve the Supplier's health and safety performance.
- Follow all applicable safety procedures, including Patria's safety instructions when working at Patria's premises or under Patria's supervision, recognising that their actions directly impact Patria's safety performance and legal obligations.
- Maintain a healthy, safe, and hazard-free working environment.
- Implement and maintain effective safety management practices.
- Ensure employees receive appropriate training in safe work methods.
- Actively identify, assess, and reduce health and safety risks.
- Report any accidents, incidents, or near misses occurring at Patria's premises or otherwise affecting Patria's operations without delay.



## RESPECT FOR PEOPLE AND COMMUNITIES

# RESPECT FOR HUMAN RIGHTS AND FAIR EMPLOYMENT PRACTICES

## Why

Respecting human rights is fundamental to protecting people, building trust, and ensuring responsible and sustainable business. Our commitment to internationally recognised human and labour rights across all operations and value chains is essential to maintaining credibility and fulfilling our role as a trusted partner in the defence and security sector.

## Patria's commitment

We uphold internationally recognised human and labour rights by adhering to leading global standards and conducting continuous human rights due diligence across our operations and value chain. We also communicate transparently, engage stakeholders in managing impacts, and provide accessible grievance channels for all.

## WE EXPECT OUR PARTNERS TO:

- Ensure all work is voluntary and prohibit any form of forced, bonded, or child labour.
- Provide fair, safe, and dignified working conditions for all employees.
- Respect freedom of association and collective bargaining rights.
- Prevent discrimination, harassment, or any form of abusive behaviour.
- Offer fair compensation, reasonable working hours, and ethical recruitment practices.
- Monitor their supply chain and address human rights risks proactively.



## RESPECT FOR PEOPLE AND COMMUNITIES

# ENVIRONMENTAL SUSTAINABILITY

## Why

Protecting the environment is essential to safeguarding and ensuring a sustainable future for generations to come. Environmental responsibility strengthens resilience, supports long-term business success, and reflects our role as a trusted partner in the defence and security sector.

## Patria's commitment

We are committed to building the best possible environmentally sustainable model across all our business areas, manufacturing, and personnel. We use resources responsibly, minimize waste and emissions, and continuously work to reduce our environmental impact.

## WE EXPECT OUR PARTNERS TO:

- Implement an environmental management system, or a comparable system suitable for their operations, to monitor and improve environmental performance.
- Comply with applicable environmental and chemical legislation and handle chemicals responsibly to minimise risks to employees and the environment.
- Identify, control, and manage hazardous substances safely throughout their lifecycle, ensuring proper storage, labelling, handling, transport, and disposal.
- Manage environmental risks proactively and minimise harmful impacts on the environment.
- Monitor and reduce carbon and energy footprints and favour sustainable solutions.
- Develop supply chain and transport practices that minimise environmental impacts.
- Minimise waste and maximise responsible recycling and waste handling.
- Use freshwater responsibly and manage wastewater in a compliant and environmentally sound manner.
- Improve environmental awareness of staff and stakeholders.



## RESPECT FOR PEOPLE AND COMMUNITIES

# RESPONSIBLE SOURCING

## Why

Responsible sourcing helps prevent human rights abuses, environmental harm, corruption, and other unethical practices that may be linked to materials, suppliers, or production processes. As part of a global value chain, Patria and its suppliers must ensure that raw materials and components are sourced responsibly and transparently to mitigate risks and uphold trust.

## Patria's commitment

We work to ensure that the materials and services we procure meet high ethical, social, and environmental standards. We conduct due diligence on supply chain practices, and expect equivalent diligence from our partners.

## WE EXPECT OUR PARTNERS TO:

- Source materials – including raw materials and minerals – responsibly and strive to prevent contributing to human rights abuses, environmental degradation, or unlawful practices.
- Conduct appropriate supply chain due diligence to identify, assess, and address risks related to sourcing, including EU sanctions compliance, labour conditions, environmental impacts, and the origin of minerals and other high-risk materials.
- Maintain transparency in their supply chains and provide Patria with relevant information upon request, including documentation on material origin and due diligence processes.
- Ensure that sub-suppliers apply the same responsible-sourcing standards and flow down requirements throughout their value chain.
- Identify and mitigate the risk of sourcing from areas affected by conflict, corruption, or other severe sustainability risks.
- Cooperate with Patria to address any responsible-sourcing concerns and take corrective action where required.



## RESPECT FOR PEOPLE AND COMMUNITIES

# GLOBAL TRADE COMPLIANCE

## Why

Global trade compliance practices are essential to protecting our company and stakeholders – and to helping Patria maintain its licence to operate. By acting with transparency, accuracy, and integrity in all transactions and ensuring that our operations comply with international laws and regulations regarding trade compliance and sanctions, we not only meet legal requirements but also strengthen trust.

## Patria's commitment

We are committed to full compliance with international trade laws and regulations by rigorously screening partners, adhering to export control and restrictive measures related requirements, in all our countries of operation, and cooperating proactively with competent authorities. We also conduct thorough due diligence on all business relationships to ensure responsible and lawful operations.

## WE EXPECT OUR PARTNERS TO:

- Fully comply with all applicable export control laws, sanctions regulations, and related requirements, including EU and US sanctions.
- Not provide Patria with any items, products, or services that are directly or indirectly subject to sanctions.
- Plan for and obtain all necessary authorisations, permits, or licences to ensure compliant and timely delivery of products and services.
- Ensure sufficient internal awareness and knowledge of export control and sanctions requirements applicable to dealings with Patria, supported by appropriate internal controls.
- Restrict access to export-controlled goods, software, or technology strictly to authorised personnel or entities and flow-down these requirements to sub-tier suppliers where applicable.
- Adequately control intangible technology transfers.
- Establish a risk-management process and conduct appropriate due diligence on third parties, including regular screening to ensure they are not subject to restrictive measures and to enable prompt identification of diversion risks.
- Cooperate in good faith with Patria and proactively share any export-control or sanctions-related risks relevant to the business relationship as soon as they are identified.
- Provide truthful and accurate information – including export control classification codes, country of origin, and any other relevant data – and maintain complete, accurate, and compliant product documentation.



# BUSINESS CONDUCT AND INTEGRITY

- Product conformity and quality
- Conflicts of interest
- Anti-bribery and corruption
- Business courtesies
- Fair competition



## BUSINESS CONDUCT &amp; INTEGRITY

# PRODUCT CONFORMITY AND QUALITY

## Why

High product reliability and quality protect end users, ensure operational reliability, and prevent risks caused by non-conforming or counterfeit components. Strong supply chain standards are essential to Patria's ability to deliver high-quality, compliant, and reliable products.

## Patria's commitment

We require that all products, components, and services meet defined safety, quality, and performance standards. We use strict quality assurance processes, comply with applicable regulations and customer requirements, and monitor product quality throughout the lifecycle. Patria also collaborates closely with suppliers to identify and mitigate safety risks early, including ensuring that counterfeit parts and materials are not introduced into any deliverables.

## WE EXPECT OUR PARTNERS TO:

- Deliver products and services that meet agreed specifications, safety requirements, and quality standards.
- Prevent counterfeit parts and materials by maintaining effective controls and processes.
- Notify Patria immediately of any confirmed or suspected counterfeit products and ensure they are removed from deliverables.
- Report without delay any safety or quality deviations or risks.
- Maintain documentation demonstrating compliance and support audits, inspections, and corrective actions.



## BUSINESS CONDUCT &amp; INTEGRITY

# CONFLICTS OF INTEREST

## Why

Conflicts of interest - whether actual, potential, or perceived - can compromise objectivity, damage trust, and harm Patria's reputation and business relationships. Identifying and managing conflicts early helps protect Patria's integrity and ensures fair, transparent business practices.

## Patria's commitment

We avoid situations where personal interests could conflict with Patria's interests by assessing transactions for potential or actual conflicts and ensuring transparency. We also encourage disclosure and provide guidance through the Compliance team to manage any concerns appropriately.

## WE EXPECT OUR PARTNERS TO:

- Avoid situations where personal interests could influence, or appear to influence, business decisions.
- Disclose any actual or potential conflicts of interest without delay.
- Make decisions based on objective, fair, and legitimate business considerations.
- Maintain adequate records of relevant internal assessments.



## BUSINESS CONDUCT &amp; INTEGRITY

# ANTI-BRIBERY AND CORRUPTION

## Why

Corruption and bribery undermine fair competition, erode trust, and damage reputation. Decisions influenced by unethical conduct can lead to serious legal, financial, and reputational consequences. By rejecting all forms of corruption, we help ensure that our operations and value chains remain transparent, responsible, and aligned with the public interest.

## Patria's commitment

Patria has zero tolerance for corruption, and this standard applies even in countries where local laws or customs may permit minimal or routine payments. We strictly prohibit all bribery, illegal payments, and facilitation payments, and we expect our suppliers to follow the same standard. We uphold the highest ethical conduct in every interaction, particularly with political parties, public authorities, and officials.

## WE EXPECT OUR PARTNERS TO:

- Comply with all anti-corruption laws, directives, and regulations applicable to their operations.
- Refrain from offering, promising, or providing any improper payment or anything of value to government officials, political parties, candidates for public office, or any other person.
- Establish internal anti-bribery and corruption policies and adequate internal controls, including appropriate training and recordkeeping.
- Prohibit facilitation payments intended to expedite or secure routine governmental actions, even where such payments may be permitted under local law.
- Engage only with employees, agents, intermediaries, consultants, representatives, distributors, contractors, suppliers, consortia, and joint-venture partners whose reputation and conduct meet Patria's and the supplier's ethical standards.
- Ensure arrangements with third parties never lack clearly defined roles, deliverables, or legitimate business purpose.
- Never engage in situations where a partner receives payments or other benefits without providing actual, legitimate services.



## BUSINESS CONDUCT &amp; INTEGRITY

# BUSINESS COURTESIES

## Why

Business courtesies, such as gifts, hospitality, and entertainment, can help build goodwill and strengthen professional relationships. However, if not handled carefully, they can create an appearance of impropriety or even lead to conflicts of interest and corruption. Accepting or offering inappropriate courtesies can compromise, or appear to compromise, the ability to make objective decisions and may damage stakeholder trust.

## Patria's commitment

We allow business courtesies only for legitimate, reasonable, and transparent purposes and strictly prohibit any payments, gifts, or benefits intended to influence decisions or gain unfair advantage. We also avoid even the appearance of impropriety in all interactions, especially with customers, partners, and public sector representatives.

## WE EXPECT OUR PARTNERS TO:

- Compete solely on the merits of their products and services, not through inappropriate business courtesies.
- Ensure that any gift or courtesy offered or received is permitted by law, aligns with the recipient's organisational rules, and reflects reasonable marketplace practices.
- Ensure any business courtesies are not used to obtain an unfair competitive advantage or improper influence.



## BUSINESS CONDUCT &amp; INTEGRITY

# FAIR COMPETITION

## Why

Healthy competition drives innovation, improves quality, and benefits customers, partners, and society at large. However, unfair practices, such as collusion, market manipulation, or misuse of confidential information, can distort markets, harm trust, and expose to serious legal and reputational risks. Compliance with competition and antitrust laws is not just a legal obligation, it's a reflection of a commitment to integrity and fair play.

## Patria's commitment

We promote fair and effective competition by complying with all applicable competition and antitrust laws and avoiding any agreements or practices that could limit market fairness. We also deal transparently and fairly with customers, suppliers, partners, and competitors, seeking required clearances and ensuring no abuse of market position.

## WE EXPECT OUR PARTNERS TO:

- Promote free competition and comply with all applicable competition and antitrust laws and regulations.
- Never enter into agreements with competitors to fix prices, rig bids, allocate customers or markets, or exchange competition sensitive information.



# SAFEGUARDING ASSETS AND INFORMATION

- Information security, privacy and responsible use of technology
- Fraud prevention



## SAFEGUARDING ASSETS AND INFORMATION

# INFORMATION SECURITY, PRIVACY AND RESPONSIBLE USE OF TECHNOLOGY

## Why

Strong protection of information and technology is vital for trust, business continuity, and legal compliance. As digital systems and AI evolve, misuse or weak governance can create ethical, operational, and security risks.

## Patria's commitment

We safeguard data, systems and digital infrastructure, respect privacy, and ensure information is accessed and used only for legitimate business purposes. We apply safe and ethical principles to all technologies we use or develop, promote robust cybersecurity, and respond quickly to suspected incidents.

## WE EXPECT OUR PARTNERS TO:

- Maintain strong physical and digital security to protect information, materials and IT systems.
- Respect privacy and comply with all applicable data-protection requirements.
- Use technologies - including software, data systems and AI - safely, securely and ethically.
- Handle confidential, proprietary and personal data with due care and only for the intended business purpose.
- Protect systems and products from misuse, manipulation or harmful outcomes.
- Follow relevant laws, standards and ethical guidelines for technology use.
- Implement effective cybersecurity controls and report any suspected unauthorised access or data breaches without delay.
- Share relevant information on technological risks and cooperate in mitigating them.



## SAFEGUARDING ASSETS AND INFORMATION

# FRAUD PREVENTION

## Why

Fraudulent activity - whether committed by employees, management, or external parties - undermines Patria's integrity and puts our people, reputation, and future at risk. It's more than just breaking the rules: fraud threatens our safety, exposes us to legal and financial consequences, and erodes the trust we've built with customers and partners. Even a single act can have far-reaching effects. That's why every one of us plays a vital role in keeping Patria honest, transparent, and resilient.

## Patria's commitment

We maintain zero tolerance for fraud by enforcing honest and transparent conduct, supported by strong policies and controls that prevent, detect, and address fraudulent activity. We investigate all allegations thoroughly, take corrective action when needed, and remain vigilant against fraud attempts from both internal and external parties.

## WE EXPECT OUR PARTNERS TO:

- Prohibit fraud, misrepresentation, falsification, or deceptive practices.
- Establish appropriate internal policies and internal controls.
- Maintain accurate records and transparent financial processes.
- Use funds, assets, and authorisations responsibly and only for legitimate purposes.
- Report immediately any suspected or actual fraud that concerns or may impact Patria.



# RAISING CONCERNS

— Speaking Up and Reporting Concerns



## RAISING CONCERNS

# SPEAKING UP AND REPORTING CONCERNS

## Why

A culture of integrity depends on everyone feeling safe and empowered to speak up. Timely reporting of concerns helps prevent misconduct, protect people, and ensure that issues are addressed before they escalate. When partners raise concerns openly, they help strengthen trust and support ethical and responsible business, throughout our value chain.

## Patria's commitment

We encourage speaking up and ensure that all concerns are taken seriously, handled promptly, and investigated appropriately. We prohibit any form of retaliation against individuals who raise concerns in good faith, whether through Patria's channels or within their own organisation. We also maintain accessible, confidential reporting mechanisms for employees, partners, and stakeholders.

## WE EXPECT OUR PARTNERS TO:

- Promote an open culture in which employees feel safe to raise questions or concerns without fear of retaliation.
- Provide accessible reporting channels that allow concerns to be shared confidentially and, where permitted by law, anonymously.
- Investigate concerns appropriately and take corrective actions when needed.
- Report without delay any concerns, incidents, or irregularities that involve Patria, its employees, assets, or operations, through the appropriate Patria reporting channels.
- Prohibit any form of retaliation against individuals who speak up in good faith.



Patria encourages anyone who becomes aware of violations or concerns related to the expectations set out in this Code to alert Patria.

This can be done through Patria's SpeakUp Channel:

<https://www.patriagroup.com/sustainability/managing-sustainability/raising-concerns>

# Patria

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