## Embraer Supplier Code of Conduct

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## Embraer Supplier Code of Conduct

Embraer's strong reputation and credibility are built by our entire ecosystem through actions and attitudes, day after day. Our suppliers are key partners in this process, and with that in mind, Embraer has published the Embraer Supplier Code of Conduct ("Code").

The Code is based on Embraer's Corporate Values, the principles of the UN Global Compact, and best practices in corporate governance and accounting. It sets expected standards and minimum requirements for our suppliers to achieve our business objectives in an ethical, honest and transparent manner, strengthening the relationship between the parties and contributing to the well-being of the communities where we operate.

As part of this Code, suppliers are expected to fully comply with all applicable laws, rules, regulations and requirements (both national and international), as well as to understand and fully apply this Code throughout their entire supply chain. No provision contained in this Code shall replace any stricter provision contained in any contract entered into between Embraer and its suppliers.





#### **Human Rights**

Suppliers are expected to conduct their business in a manner that respects and promotes human rights, complying with all applicable national and international laws, as well as the requirements derived from the Universal Declaration of Human Rights.

In addition, suppliers must foster a culture and work environment where discrimination and harassment practices, including moral and sexual harassment, threats, or retaliation for any reports, are not tolerated. Furthermore, suppliers must treat employees equally, with dignity and respect.



#### **Working Conditions**

Suppliers must comply with and ensure that all applicable laws, regulations and standards related to working conditions for all their employees are followed, such as payment of the legal minimum wage according to each category, compliance with legally required rest periods, adequate working conditions, freedom of association and protection against retaliation, privacy, collective agreements, immigration rights and a safe and healthy work environment.

Suppliers must respect workers' right to freely associate and communicate with management regarding working conditions. They must recognize the legal right to join or not join any organization of their choice, in accordance with national legislation.

Suppliers must ensure that their employees have regulated working hours, daily and weekly rest periods, as well as annual vacations, in compliance with applicable laws.





Additionally, suppliers must ensure that, beyond payment for regular working hours, employees receive compensation for overtime at the additional rate required by law or, in countries where no specific legislation exists, at least at the same rate as regular hours. In locations where legislation allows, a time-off compensation system may be adopted, provided that all applicable legal requirements are fully observed.

Salary deductions as a disciplinary measure are not permitted, nor any other deductions not provided for by national legislation or defined in a contract.

Suppliers are expected to create and maintain a work environment where employees can report any safety concerns or violations without fear of retaliation.

They must maintain a fair disciplinary process to address performance, conduct, or absence issues and provide an effective channel for complaints and disciplinary appeals, ensuring confidentiality and protection against retaliation.







#### Forced Labor, Child Labor and Human Trafficking

We expect our suppliers not to engage in any form of slave labor, including forced labor, child labor and human trafficking. Work must be carried out in accordance with the ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work.

The term "child" refers to any person below the legal minimum age for employment in the country where the work is performed or the minimum age defined by the ILO, whichever is higher.

Furthermore, all workers under the age of 18 must be protected from hazardous activities or those that may harm their health, physical, mental, social, or moral development.

Suppliers must provide decent working conditions for their employees, ensuring compliance with the laws in force in each country where they operate.



#### **Migrant Workers**

The term "migrant worker" refers to a person who performs, will perform, or has performed paid work in a country of which they are not a national.

Suppliers must ensure that migrant workers are hired in full compliance with the immigration and labor laws of the host country, guaranteeing fair and lawful employment conditions.







#### **Diversity, Equity and Inclusion**

Embraer suppliers are committed to promoting a culture of diversity, equity and inclusion, ensuring opportunities for all individuals regardless of race, ethnicity, gender, age, nationality, religion, marital status, sexual orientation, gender identity, whether they are persons with or without disabilities, or other personal characteristics. They must guarantee a safe, welcoming and discrimination-free work environment, where respect, equality and fairness prevail.

Suppliers are expected to:

- Ensure equal opportunities at all stages of employment (hiring, compensation, benefits, promotion, termination and retirement), based on ability and not on personal characteristics.
- Fully comply with applicable laws and regulations related to non-discrimination and human rights.
- Adopt practices that promote equity and foster inclusive, safe and prejudice-free environments, with decisions based on objective criteria.
- Be committed to combating prejudice and discrimination in the workplace, promoting awareness and continuous training of their employees on the subject.

Embraer values partners who share these principles and contribute to an ethical, diverse and inclusive supply chain.



## ENVIRONMENT & PRODUCT SAFETY





#### **Environment**

As part of its commitment to sustainability, Embraer seeks to positively impact society and the environment, especially in the communities where it operates. The company recognizes the environmental challenges of the sector and continuously invests in processes and technologies to reduce its impact. This same commitment to pollution prevention, biodiversity preservation and resource efficiency must be shared by its suppliers, with progress in the following areas:

#### 1. Environmental Management System

Suppliers are expected to conduct their business in a way that actively manages environmental risks and opportunities in their operations, products and supply chain.

Suppliers must establish an appropriate environmental management system (preferably certified by ISO 14001 or equivalent), including policies and procedures aimed at effectively managing environmental performance and integrating environmental considerations into their services and product design.

### 2. Resource Efficiency, Pollution Prevention and Waste Management

Suppliers are expected to:

- Aim to reduce water, energy and raw material consumption through optimized processes and clean technologies.
- Implement practices to prevent air, water and soil pollution, ensuring proper treatment and safe disposal of hazardous and non-hazardous waste.
- Promote material reuse and recycling, as well as circular economy practices.



## ENVIRONMENT & PRODUCT SAFETY



- Minimize waste generation and the use of hazardous materials.
- Use appropriate external packaging, promoting reusable or recycled materials and reducing disposable or single-use materials.
- Responsibly manage atmospheric emissions and anticipate future regulatory restrictions on chemical substances.
- Actively work on the development and dissemination of sustainable technologies that contribute to the progressive reduction of greenhouse gas emissions.
- Properly manage carbon emissions within their organization and throughout the value chain, regularly reporting their greenhouse gas inventory to Embraer, preferably via the "CDP Supply Chain" platform.\*
- Consider environmental criteria when contracting products and services.

\*CDP is a globally recognized international non-profit organization that manages a self-reported environmental data system for companies and governments. Find more information at: <a href="www.cdp.net">www.cdp.net</a>.



## ENVIRONMENT & PRODUCT SAFETY





#### **Product Safety**

Suppliers must ensure that product safety is a priority at all stages, maintaining in their processes and teams the principle: Safety First. They must comply with airworthiness standards and applicable regulations, promptly report any risk or incident and collaborate in analyses and investigations.



#### **Counterfeit Parts Prevention**

Suppliers must maintain effective processes to control or prevent the use or delivery of counterfeit or suspected counterfeit parts. Products containing counterfeit parts must not be shipped to Embraer. If the presence of such parts is identified or suspected, the supplier must immediately notify Embraer in writing, providing details to enable corrective actions.



# INTEGRITY & BUSINESS ETHICS





## Integrity, Ethics, Anti-Corruption Practices and Fair Competition

Embraer maintains a non-negotiable commitment to integrity, ethics and compliance with anti-corruption laws, considering these principles essential for business sustainability and success. We expect our suppliers to adopt the same standards in all their activities.

Suppliers must conduct their business with the highest level of integrity, establishing and maintaining an effective Ethics and Compliance Program that ensures compliance with applicable laws and regulations governing their operations and supply chains.

It is mandatory to avoid situations that may create or appear to create a conflict of interest with Embraer, as well as promptly report any identified conflict.

Embraer does not tolerate any form of active or passive corruption, including bribery, extortion or any practice intended to obtain undue advantage. Suppliers must strictly comply with all applicable anti-corruption laws in the countries where they operate. For more information, please refer to Embraer's Anti-Corruption Policy and Code of Ethics and Conduct.

Additionally, suppliers must conduct their business with integrity and transparency, promoting a healthy competitive environment, avoiding anti-competitive practices (such as price fixing, market division and bid rigging) and respecting applicable laws. To achieve this, it is recommended to:

Adopt practices that ensure free competition, guaranteeing fair and balanced negotiations;

Maintain transparency in business relationships, strictly complying with current regulations;



# INTEGRITY & BUSINESS ETHICS





## Integrity, Ethics, Anti-Corruption Practices and Fair Competition

Implement internal policies and provide periodic training to employees, strengthening the culture of ethics and preventing anti-competitive behavior.



# INTEGRITY & BUSINESS ETHICS





#### Gifts, Giveaways and Hospitality

Embraer values business relationships based on integrity and transparency. Therefore, suppliers must not offer gifts, giveaways, or hospitality to Embraer employees, thus avoiding any undue advantage, whether apparent or real. In exceptional situations and only when strictly necessary, any courtesy offered must meet the following criteria:

- Have a modest value appropriate to the circumstances and local culture;
- Be offered infrequently and transparently, in the normal course of business;
- Not involve cash or equivalents (such as gift cards or vouchers);
- Be related to a legitimate business purpose and comply with local laws and Embraer policies;
- Not occur during BID processes or contract negotiations;
- Respect the internal rules of the organization.



## INFORMATION PROTECTION





#### Confidentiality

Suppliers must maintain the confidentiality of all information, specifications, processes, or technical and/or commercial initiatives identified as confidential, sensitive and/or intellectual property belonging to Embraer.



#### **Records Maintenance**

Suppliers must create, store and maintain business records accurately and securely, ensuring they faithfully represent the transactions carried out. It is prohibited to alter records to conceal or distort information. All records must be retained in accordance with applicable legal retention periods.



#### **Cybersecurity Threats**

Embraer expects suppliers to implement adequate security measures to protect against cybersecurity threats such as malware, phishing attacks and data breaches.

Additionally, suppliers are expected to use Artificial Intelligence responsibly, ensuring legal and ethical compliance and adhere to all applicable laws and regulations related to cybersecurity while following relevant industry standards.

Suppliers must ensure timely and transparent disclosure to Embraer of any cybersecurity incidents or vulnerabilities that may affect their products or services.



## GLOBALTRADE AND EXPORT CONTROL





#### **International Trade Compliance**

Embraer is subject to foreign trade laws and complies with all regulations related to the import and export processes of products, services, technology, information and financial operations.

Therefore, suppliers must ensure compliance with all laws and regulations regarding export control, including U.S. (United States of America) and EU (European Union) laws and regulations, as well as any other regulations applicable to the business.

Suppliers must provide export control documentation, export licenses, or other necessary authorizations to Embraer when requested. Additionally, throughout their supply chain, suppliers must observe and comply with applicable laws related to sanctions and embargoes, providing accurate information, classifications and licenses when required and comply with import and export control regulations (especially ITAR and EAR, when applicable) for goods, services and industrialization, in accordance with the procedures and policies established by the company.



# GLOBALTRADE AND EXPORT CONTROL





#### **Responsible Sourcing of Minerals**

Suppliers must identify, through appropriate measures and provide the requested information related to products, raw materials, parts or other supplied materials that may contain tin, tantalum, tungsten and gold originating from conflict regions.

Embraer supports ending violence and human rights violations in the Democratic Republic of Congo and neighboring countries. As part of our social impact management process, we have established the "Conflict Minerals" clause in our contracts, which requires suppliers to report the origin of minerals contained in the products supplied by them and their subcontractors to Embraer in accordance with applicable U.S. legislation (Dodd-Frank Act).

To eliminate the social impacts of our activities, one of our initiatives has been to make Embraer an integral part of several global Conflict Minerals programs, including but not limited to: Aerospace Industries Association ("AIA") and Responsible Business Alliance – Responsible Minerals Initiative ("RBA-RMI").



## GOVERNANCE & REPORTING MANAGEMENT SYSTEMS





#### **Reporting Violations**

All Embraer stakeholders, including employees, suppliers, customers, shareholders and business partners, among others, must report any concerns regarding potential violations of the principles and values of this Code.

Embraer provides several channels to report concerns or violations. Anyone may report a concern or violation through these channels, such as the Board of Directors and its Audit, Risk and Ethics Committee, the employee's leader or manager, the Compliance department, Internal Audit, Human Resources, Legal department or the Helpline channel.

The Helpline is a confidential channel for employees and stakeholders to report potential violations of Embraer's policies and procedures, this Code, or any applicable law or regulation.

Embraer does not tolerate any direct or indirect retaliation against anyone who reports through the channels provided by the Company, a concern made in good faith. Furthermore, all reported matters, concerns, or those specifically directed to the Helpline will be handled with confidentiality and respect for anonymity.

#### **How to Submit a Concern?**

#### By phone:

Brazil: 0800-721-5968

China: 400-120-4946

United States of America: 1-877-900-8779

France: 0805-080608

Netherlands: 0-800-022-7230

Portugal: 800-180-118

**Singapore:** 800-130-2122

By website: www.embraerhelpline.com



