



Corporate Supplier Sustainability Code of Conduct

NWI-SP-001

2026

NWI Aerostructures

Supplier Code of Conduct

At NWI Aerostructures, we recognize that our responsibility extends beyond our own operations and throughout our supply chain. As a supplier to the global aerospace industry, we are committed to conducting business with integrity, protecting people, preserving the environment, and maintaining the highest standards of ethical behavior.

Our customers, employees, shareholders, communities, and business partners expect us to operate responsibly and sustainably. We expect the same commitment from the suppliers, contractors, consultants, and service providers who support our operations.

This Corporate Supplier Sustainability Code of Conduct applies to all NWI Aerostructures operations, including NWI Nashville, NWI Wichita, and any future subsidiaries, divisions, or operating locations. Suppliers conducting business with any NWI Aerostructures entity are expected to comply with the requirements established within this Code.

We expect all suppliers to embrace these principles, continuously improve their performance, and work collaboratively with NWI Aerostructures to build a resilient, ethical, and sustainable supply chain.

Walt Sirmans
Chief Executive Officer

1 Purpose

The purpose of this Supplier Sustainability Code of Conduct is to establish the environmental, labor, human rights, health and safety, ethical, and governance expectations applicable to all suppliers doing business with NWI Aerostructures.

This Code serves as the foundation of the NWI Aerostructures Sustainable Procurement Program and supports customer, regulatory, and stakeholder expectations regarding responsible business conduct.

2 Scope

This Code applies to:

- Suppliers
- Contractors
- Subcontractors
- Consultants
- Temporary labor providers
- Logistics providers
- Service providers
- Other business partners supplying products or services to NWI Aerostructures, including NWI Nashville, NWI Wichita, and any future subsidiaries, divisions, or operating locations owned or controlled by NWI Aerostructures. This Code applies to suppliers providing products or services to any NWI Aerostructures location.

Suppliers are expected to communicate these requirements throughout their own supply chains and exercise appropriate oversight of subcontractors and lower-tier suppliers.

2.1 Organizational Applicability

This Corporate Supplier Sustainability Code of Conduct is issued by NWI Aerostructures and applies to all operating locations and business units under NWI Aerostructures management and control, including:

- NWI Nashville
- NWI Wichita

Suppliers conducting business with any NWI Aerostructures entity shall comply with the requirements established within this Code.

3 Compliance with Laws & Regulations

Suppliers shall comply with all applicable:

- Federal, state, provincial, and local laws
- Environmental regulations
- Occupational health and safety regulations
- Labor and employment laws
- Anti-corruption laws
- Trade compliance regulations
- Aerospace customer requirements
- Contractual obligations

Suppliers shall maintain all required permits, licenses, registrations, certifications, and approvals necessary to conduct business.

4 Human Rights & Labor Practices

NWI Aerostructures is committed to internationally recognized human rights principles and expects suppliers to uphold those same standards.

4.1 Child Labor

Suppliers shall not employ individuals below the legal minimum age for employment.

4.2 Forced Labor

Suppliers shall prohibit:

- Forced labor
- Bonded labor
- Prison labor
- Indentured labor
- Human trafficking
- Modern slavery

Employment shall be voluntary and freely chosen.

4.3 Human Trafficking

Suppliers shall maintain policies and controls to prevent human trafficking and exploitation within their operations and supply chains.

4.4 Non-Discrimination

Suppliers shall provide equal employment opportunities and prohibit discrimination based on any legally protected status.

4.5 Harassment & Respectful Workplace

Suppliers shall maintain workplaces free from:

- Harassment
- Bullying
- Violence
- Abuse
- Intimidation
- Retaliation

4.6 Freedom of Association

Suppliers shall respect employees' lawful rights regarding freedom of association and collective bargaining.

4.7 Wages & Working Hours

Suppliers shall comply with applicable laws governing:

- Wages
- Overtime
- Benefits
- Working hours
- Rest periods

5 Occupational Health & Safety

Suppliers shall provide a safe and healthy work environment.

At a minimum, suppliers shall:

- Identify workplace hazards
- Implement risk controls
- Provide employee safety training
- Maintain emergency response procedures
- Investigate incidents and near misses
- Provide appropriate personal protective equipment
- Promote injury and illness prevention
- Comply with all health and safety regulations

NWI Aerostructures encourages suppliers to maintain occupational health and safety management systems aligned with ISO 45001.

6 Environmental Stewardship

Suppliers shall conduct business in a manner that protects the environment and supports sustainable development.

Suppliers shall:

- Comply with environmental laws and permit requirements
- Prevent pollution
- Minimize waste generation
- Reduce energy consumption where feasible
- Conserve water and natural resources
- Manage chemicals responsibly
- Prevent environmental releases
- Promote recycling and reuse
- Support greenhouse gas reduction initiatives

NWI Aerostructures encourages suppliers to maintain environmental management systems aligned with ISO 14001.

7 Climate Change & Greenhouse Gas Management

NWI Aerostructures recognizes climate change as a significant business and environmental challenge.

Suppliers are encouraged to:

- Measure greenhouse gas emissions
- Establish reduction objectives
- Improve energy efficiency
- Support renewable energy initiatives where practical
- Participate in customer sustainability reporting activities

Suppliers may be requested to provide information supporting Scope 3 greenhouse gas emission calculations.

8 Responsible Sourcing & Supply Chain Due Diligence

Suppliers shall implement reasonable due diligence processes to identify and address environmental, labor, human rights, and ethical risks within their supply chains.

Suppliers shall cooperate with requests related to:

- Conflict minerals
- Forced labor prevention
- Country-of-origin reporting
- Responsible sourcing requirements
- Human rights due diligence
- Sustainability performance reporting

9 Business Ethics

Suppliers shall conduct business with integrity and transparency.

9.1 Anti-Bribery & Corruption

Suppliers shall not engage in:

- Bribery
- Corruption
- Kickbacks
- Facilitation payments
- Improper gifts
- Improper entertainment

9.2 Conflicts of Interest

Suppliers shall disclose actual or potential conflicts of interest involving NWI Aerostructures.

9.3 Fair Competition

Suppliers shall comply with all applicable antitrust and competition laws and should never make agreements with competitors to fix prices, rig bids, allocate customers or markets, or exchange any pricing information.

9.4 Fraud Prevention

Suppliers shall not engage in:

- Fraud
- Falsification of records
- Misrepresentation
- Deceptive business practices

9.5 Export Controls & Trade Compliance

Suppliers shall comply with all applicable export control, sanctions, and international trade regulations.

10 Data Privacy, Information Security & Intellectual Property

Suppliers shall:

- Protect confidential information
- Safeguard intellectual property
- Maintain appropriate cybersecurity controls
- Comply with applicable privacy laws
- Prevent unauthorized disclosure of information

11 Monitoring & Assessment

NWI Aerostructures reserves the right to assess supplier compliance through:

- Supplier questionnaires
- Sustainability assessments
- EcoVadis evaluations
- Performance reviews
- Document reviews
- Site visits
- Audits

Suppliers shall cooperate with reasonable requests for information related to compliance with this Code.

12 Corrective Action

When nonconformities are identified, suppliers shall:

- Investigate root causes
- Develop corrective actions
- Implement improvements
- Provide evidence of completion when requested

Failure to address significant violations may impact supplier approval status and future business opportunities.

13 Reporting Concerns

Suppliers are encouraged to promptly report concerns involving:

- Human rights violations
- Environmental misconduct
- Fraud
- Corruption
- Safety concerns
- Violations of this Code

Reports may be made without fear of retaliation.

Supplier Sustainability Code of Conduct Acknowledgement Form

PURPOSE

This form documents supplier acknowledgment and acceptance of the NWI Aerostructures Corporate Supplier Sustainability Code of Conduct.

The requirements of the Code apply to all business conducted with:

- NWI Aerostructures
- NWI Nashville
- NWI Wichita
- Any future subsidiaries, divisions, affiliates, or operating locations owned or controlled by NWI Aerostructures

SUPPLIER ACKNOWLEDGMENT

The undersigned acknowledges receipt of the NWI Aerostructures Corporate Supplier Sustainability Code of Conduct and agrees to support and comply with its requirements when conducting business with NWI Aerostructures, NWI Nashville, NWI Wichita, and any future subsidiaries, divisions, or operating locations under NWI Aerostructures management and control.

The undersigned further acknowledges that:

- The Supplier Sustainability Code of Conduct has been reviewed and understood.
- The supplier will comply with applicable environmental, labor, human rights, health and safety, ethical business conduct, and regulatory requirements described in the Code.
- The supplier will communicate applicable requirements to its employees, subcontractors, and lower-tier suppliers where appropriate.
- The supplier will cooperate with reasonable requests from NWI Aerostructures regarding supplier sustainability assessments, audits, corrective actions, and sustainability-related information requests.
- The supplier will promptly notify NWI Aerostructures of any significant violation of applicable laws, regulations, or the requirements contained within the Supplier Sustainability Code of Conduct.
- The supplier understands that compliance with the Supplier Sustainability Code of Conduct may be considered during supplier approval, evaluation, and ongoing business relationship decisions.

Supplier Sustainability Code of Conduct Acknowledgement Form

SUPPLIER INFORMATION

- Supplier Company Name:
- Supplier Address:
- Supplier Website:
- Primary Supplier Representative:
- Title:
- Phone Number:
- Email Address:

ACKNOWLEDGMENT & ACCEPTANCE

- Authorized Supplier Representative:
- Title:
- Signature:
- Date:

NWI AEROSTRUCTURES USE ONLY

- Received By:
- Title:
- Date Received:
- Supplier Number:
- Approved Supplier Status:
 - Pending Review
 - Conditionally Approved
 - Approved
- Comments:



Complex Structures. Simple Solutions.