Aeroplex of Central Europe Ltd.
Aircraft Technology Center

HUMAN RIGHTS and fair EMPLOYMENT POLICY

This Human Rights and Fair Employment Policy has been approved by the Management of Aeroplex of Central Europe Ltd.
Effective Date: _____
This Policy shall remain in force for an indefinite period unless amended or withdrawn.
Compliance with this Policy is mandatory for all employees and managers of Aeroplex of Central Europe Ltd. and, where relevant, for its business partners.
The Human Resources Department is responsible for maintaining, periodically reviewing, and updating this Policy as necessary.



PURPOSE

Aeroplex of Central Europe Ltd. (“ACE”), as a company specializing in aircraft maintenance, repair, and operational support services, is committed to applying the highest professional, safety, and ethical standards throughout its operations.

Our objective is to contribute to the safety and reliability of air transportation through our services while providing our employees with a safe, supportive, and predictable working environment.

We strive to provide value-creating employment opportunities, support the professional development of our employees, and enable them to establish long-term careers and meaningful roles within the Company and the aviation industry.

ACE is committed to respecting human rights and ensuring fair employment conditions in all its activities. We also aim to prevent, identify, and address risks arising from our operations, services, or business relationships that may adversely affect the rights and dignity of individuals.

WHAT WE DO AND WHAT WE EXPECT FROM OUR STAKEHOLDERS

In the course of our activities, we expect all employees to understand their responsibilities with respect to human rights and to actively support the realization of these rights in relation to all stakeholders.

2.1 EMPLOYEES

Employees are required to take all reasonable steps to ensure that the Company is not involved in, contributes to, or becomes associated with human rights violations.

2.2 MANAGEMENT

Managers are responsible for complying with this Policy, communicating its requirements, and ensuring adherence within their respective areas of responsibility.

2.3 BUSINESS PARTNERS

We expect our business partners to operate in accordance with the same principles and to cooperate in the investigation of any suspected violations.



PRINCIPLES

3.1 TERMS AND CONDITIONS OF EMPLOYMENT

Working Time

Working hours shall not exceed the maximum limits established by applicable local laws and any applicable collective agreement. This includes ensuring that employees are provided with adequate time for rest and leisure activities.

Overtime shall be regarded as an exceptional circumstance. Any overtime arrangements shall be agreed in advance or during the performance of the relevant work, within the limits permitted by applicable laws and with appropriate compensation.

We recognize that flexibility in working arrangements may be important to some employees in light of their personal responsibilities and priorities.

To ensure clear and transparent management of working time expectations, employment contracts, whether based on flexible or fixed working arrangements, shall clearly set out the applicable terms and conditions and shall comply with all applicable legal requirements.

Compensation

Employee compensation shall comply with all applicable labor laws, including requirements relating to non-discrimination and equal pay for equal work where applicable.

In all other cases, we apply the general principle of compliance with applicable legislation.

Our goal is to ensure that all employees have access to fair and meaningful work that enables them and their families to maintain an adequate standard of living.

This includes compensation levels that cover basic living costs for work performed during normal working hours, taking into account the specific conditions and economic circumstances of the relevant country.

Employment Contracts and Compliance with Local Employment Standards

The Company is committed to ensuring that all employment conditions not specifically addressed above meet at least the minimum requirements established by applicable local laws and regulations.

Employees shall receive timely and clear information regarding the terms and conditions of their employment, including:

- Duration of employment or contract term;
- Working hours;
- Compensation;
- Notice periods and termination conditions.

Freedom of Association

TWe respect the right of employees to establish, join, or be represented by trade unions or other legitimate employee representative organizations.

Employment shall not be conditioned upon an employee refraining from joining such organizations or relinquishing membership in them.

Collective Bargaining

We support, over the long term, a balanced approach between flexible employment arrangements and the protection of employee rights, particularly with respect to compensation and development opportunities.

We aim to maintain constructive dialogue and engage in good-faith negotiations with trade unions and other relevant representative organizations.

We support the establishment of collective bargaining agreements where appropriate and relevant.

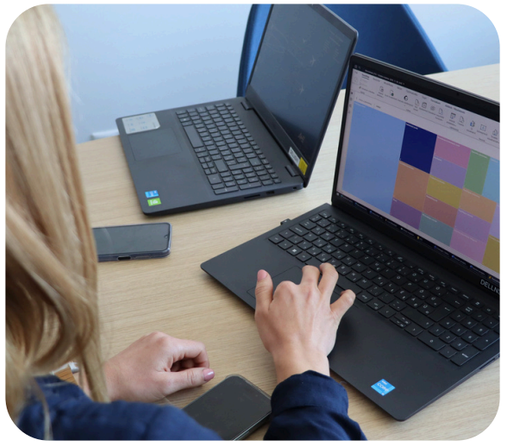
Employability and Skills Development

Continuous skills development is essential for maintaining employability and ensuring long-term sustainability.

We tailor our training and development programs to the needs of employees, business partners, and customers in the labor markets where we operate.

Our goal is to provide support to employees throughout all stages of their careers.

We are committed to promoting lifelong learning, supporting digital inclusion, and strengthening opportunities for career development.



3.2 OCCUPATIONAL HEALTH AND SAFETY

Protection of Health and Safety

We are committed to providing and maintaining a healthy and safe working environment and to promoting mental health and well-being in the workplace.

A fundamental objective of our health and safety approach is to achieve zero work-related fatalities and to continuously reduce work-related injuries, illnesses, and harm.

Unsafe working conditions are not acceptable under any circumstances.

We take all reasonably practicable measures to prevent occupational injuries and illnesses and to protect our employees, customers, suppliers, contractors, and visitors from foreseeable workplace hazards.

Where possible, we actively cooperate with our stakeholders to continuously maintain and improve workplace health and safety standards.



Where relevant to the work performed or the working environment, we ensure that employees receive the necessary health and safety information and/or training before commencing work or at the earliest possible stage of their employment.

A guiding principle in all decision-making processes is the protection of the fundamental safety of our employees.

This includes designing and maintaining appropriate systems and procedures, allocating the necessary resources, and continuously improving our business practices.

3.3 OTHER EMPLOYMENT-RELATED RIGHTS

Equality, Diversity and Inclusion

Fairness is a core element of our corporate culture and includes a deep appreciation of diversity in both people and perspectives.

Our inclusive culture ensures that every individual feels valued, respected, and empowered to contribute to shared goals.

By recognizing and embracing the unique strengths of each individual, we enable people to realize their full potential and create the foundation for both individual and organizational success.

Inclusion is more than a principle; it is one of the key drivers of our operations and helps create a strong sense of belonging.

We believe that genuine inclusion requires a holistic approach that ensures equal opportunities and supports conditions for outstanding performance and personal growth.

Non-Discrimination and Equal Opportunity

We are committed to providing equal employment opportunities and prohibit direct and indirect discrimination on any legally protected ground throughout all stages of employment.

All employment-related decisions, including recruitment, selection, hiring, transfer, promotion, compensation, benefits, workforce reductions, rehire, termination of employment, and access to training, shall be based on objective criteria, regardless of, among others:

- Race;
- Color;
- Religion;
- Ethnic origin;
- Nationality;
- Age;
- Sex, including pregnancy;
- Sexual orientation;
- Gender identity;
- Marital status;
- Disability;
- Veteran status;
- Citizenship;
- Genetic information or any other characteristic protected by applicable law.

We firmly believe that every individual has the right to be treated fairly and with respect.

We promote positive internal and external business relationships and recognize that our success is directly linked to the diversity of our employees and business partners. This principle also extends to our customers, and we expect them not to discriminate against our employees.

Where a customer engages in discriminatory conduct, our employees shall have the right to discontinue the interaction and escalate the matter through appropriate channels.

Prohibition of Harassment and Abuse

We place great emphasis on maintaining a respectful workplace environment and do not tolerate any form of harassment or abusive behavior.

Harassment means any unwanted or unlawful conduct that is physically or psychologically abusive, humiliating, offensive, or disruptive to another person.

Abusive conduct refers to severe, repeated, and intentional behavior that is unrelated to the Company's legitimate business interests and that a reasonable person would consider hostile, offensive, or degrading.

Harassment and abuse may take various forms, including:

- Offensive language;
- Humiliating remarks;
- Insults;
- Ridicule or mockery;
- Threatening behavior;
- Physical abuse;
- Deliberate obstruction of work;
- Online harassment or abuse through digital communication channels.



Sexual Harassment

Sexual harassment refers to any unwelcome conduct of a sexual nature that is offensive or unwanted.

This includes, but is not limited to:
Unwelcome advances;
Requests for sexual favors;
Sexual comments or conduct;

where such conduct becomes a condition of employment or creates an intimidating, hostile, or offensive working environment.

Data Privacy, Data Security and Artificial Intelligence

We respect the right to privacy of all employees and stakeholders.

Personal data shall be processed lawfully, fairly, and for specified legitimate purposes.

We implement appropriate measures to ensure the accuracy, security, and confidentiality of personal data. Particular attention is given to the transfer of personal data to third parties.

We are committed to the ethical and responsible use of artificial intelligence, with particular consideration for the risks of bias and discrimination.

Prohibition of Modern Slavery

We maintain zero tolerance for all forms of modern slavery, including forced labor, human trafficking, debt bondage, and exploitation.

All work must be undertaken voluntarily, and employees must be free to terminate their employment in accordance with applicable laws and contractual obligations.

Prohibition of Child Labor

We do not employ child labor, either directly or indirectly.

We comply with all applicable minimum age requirements and legal restrictions relating to the employment of young workers.

Respect for Local Communities

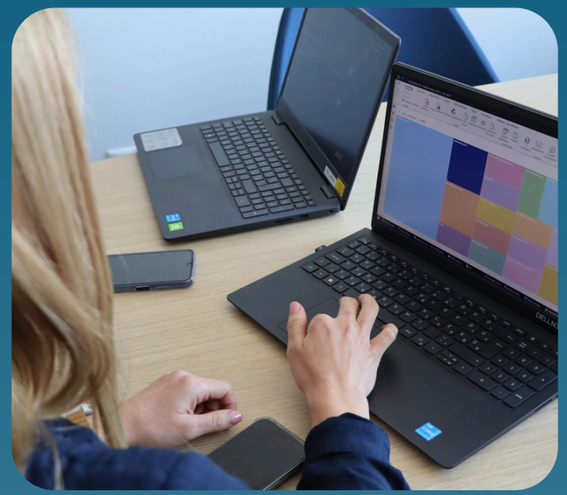
We are committed to acting as a responsible corporate citizen and contributing positively to the communities in which we operate.

We seek to minimize adverse impacts arising from our activities and support local social and economic development wherever possible.

GRIEVANCE AND REPORTING PROCEDURE

4.1 QUESTIONS OR UNCERTAINTY

Promoting both trust and legitimate business interests is one of our core values.



Anyone who has questions or is uncertain whether a particular situation is consistent with this Policy is expected to raise the matter.

Our employees may seek guidance from:

- Their direct manager;
- A Human Resources representative;
- The Legal Department;
- The local Integrity or Compliance Officer;
- Any other designated person, such as a trusted advisor or designated contact person.

4.2 REPORTING ACTUAL OR SUSPECTED VIOLATIONS

Any employee, worker, business partner, or other stakeholder who reasonably believes that this Policy has been violated is encouraged and expected to report the concern.

Reports should primarily be submitted through the local reporting channels identified above.

Where the use of local reporting channels is not appropriate, or where the reporting person fears retaliation, reports may also be submitted through the Company's centralized reporting and investigation platform, SafetyManager365.

SAFETYMANAGER365

UNIFIED REPORTING AND INVESTIGATION SYSTEM

The purpose of SafetyManager365 is to provide a consistent, transparent, and secure platform for managing events, hazards, complaints, concerns, and other reports arising within the organization.

The system supports the principles of Just Culture, promotes organizational learning, and contributes to the continuous improvement of aviation safety, compliance, and operational performance.

All employees, and where appropriate external stakeholders, may submit reports through SafetyManager365 in a simple and accessible manner.
The system allows both anonymous and identified reporting while ensuring confidential handling of reports and protection of individuals who report concerns in good faith.

Reports may be submitted in several categories, including:

- Aviation safety occurrences and hazards;
- Environment, Health and Safety (EHS) events;
- Compliance deviations;
- Fatigue-related reports;
- Customer complaints and other stakeholder complaints.

Submitted reports are processed through a predefined workflow.
The process includes: report validation, initial risk assessment, information gathering, root cause analysis and investigation, where necessary, identification and implementation of corrective and preventive actions, monitoring of action effectiveness.

SafetyManager365 supports the principles of Just Culture. The primary purpose of investigations is not to assign blame or impose sanctions, but rather to identify direct and contributing causes, derive lessons learned, and prevent recurrence of similar events.

Exceptions may apply in cases involving intentional misconduct, gross negligence, or bad-faith actions.
The system enables the tracking of corrective actions, management of deadlines, and sharing of organizational learning.
Accordingly, SafetyManager365 is not merely a reporting platform but also a key tool supporting the Company's aviation safety, quality, and compliance culture.

FINAL PROVISIONS

6.1 RELEVANT PRINCIPLES, GUIDELINES AND CONVENTIONS

This Policy has been developed by Aeroplex of Central Europe Ltd. in accordance with applicable Hungarian and European Union legislation and with consideration of the following internationally recognized principles and frameworks:

UNITED NATIONS GLOBAL COMPACT PRINCIPLES

The ten principles of the United Nations Global Compact provide guidance on human rights, labor standards, environmental protection, and anti-corruption.

AInternational Labour Organization (ILO) Core Conventions establish minimum standards for the protection of workers' rights, including:

1. Freedom of Association and Protection of the Right to Organise Convention (No. 87, 1948);
2. Right to Organise and Collective Bargaining Convention (No. 98, 1949);
3. Forced Labour Convention (No. 29, 1930);
4. Abolition of Forced Labour Convention (No. 105, 1957);
5. Minimum Age Convention (No. 138, 1973);
6. Worst Forms of Child Labour Convention (No. 182, 1999);
7. Equal Remuneration Convention (No. 100, 1951);
8. Discrimination (Employment and Occupation) Convention (No. 111, 1958).

United Nations Guiding Principles on Business and Human Rights

The "Protect, Respect and Remedy" Framework establishes:

- The duty of states to protect human rights;
- The corporate responsibility to respect human rights;
- Access to effective remedies for affected individuals.

6.2 CLOSING PROVISIONS

The Policy shall be reviewed at least annually, or more frequently where required due to changes in legislation, business operations, or organizational experience.
In the event of a breach of this Policy, the Company reserves the right to take appropriate action, including, where permitted by law, initiating disciplinary proceedings, terminating employment in serious cases, or reviewing and potentially terminating business relationships.
This Policy forms part of the Company's internal governance framework and should be read in conjunction with, among others, the following documents:

- Code of Ethics;
- Internal Whistleblowing and Reporting System (e.g. IQSMS / SafetyManager365);
- Occupational Health and Safety Policies and other Human Resources Policies.

In applying this Policy, Aeroplex of Central Europe Ltd. shall, wherever possible, seek to apply the more stringent requirement where differences exist between applicable legislation and internationally recognized human rights standards.