

# Supplier Code of Conduct

NTA's core values of respect, integrity, teamwork, and accountability serve as a foundation of doing business the right way with customers and communities and our suppliers.

In everything we do, we hold ourselves accountable to the highest industry standards and our own stringent requirements for ethical conduct. This is not only the right thing to do but also critical to maintaining trust and our social license to operate.

This code aligns with broader policies that govern NTA's operations. These policies, procedures and principles include but are not limited to Diversity and Inclusion, Supply Chain, Human Rights.

Our suppliers play a vital role in helping us deliver the promises we make and live by our guiding principles and core values.

Our Supplier code of conduct, which draws upon internationally recognized standards and our Code of Conduct, sets our expectations of our suppliers and their affiliates or subcontractors.

All NTA suppliers must comply with this code. Each supplier must also ensure that its affiliated entities, employees, sub-contractors, and its own supply chain will comply with the code. If a Supplier fails to comply with the code or shows signs that it is not committed to improving its practices to ensure compliance with the Code, NTA will review its relationship with the supplier. This review may result in consequences up to and including the termination of our relationship with the supplier. This code does not create or intend to create any third-party beneficiary rights.

This code benchmarks the minimum requirements of acceptable conduct. We strongly encourage Suppliers to exceed the minimum requirements of this code and to promote best practices and continuous improvement throughout their operations. Suppliers are expected to use their best judgment when seeking to comply with the words and spirit of the code.

Suppliers must comply with the following:

1. Comply with all applicable laws, regulations, and standards.
2. Not tolerate retaliation of any kind against a person making a report or complaint of a violation of the code, or other illegal or unethical conduct, or against a person cooperating in an investigation related to a report or complaint.
3. Disclose at the outset and continue to disclose any relationships or interests (financial or otherwise) that might represent an actual conflict of interest or even the appearance of a conflict of interest with NTA.
4. Abide by all applicable anti-Corruption and anti-Bribery laws, and never directly or indirectly practice or tolerate any form of corruption, bribery, kickbacks, money-laundering, fraud, facilitation payments, embezzlement, or extortion.
5. Protect NTA's assets and confidential information, and not disclose any confidential information to any third party without the approval of NTA's Legal Department, unless such disclosure is required by law.
6. Ensure compliance with all applicable health, safety, and environmental regulations.
7. Provide a work environment that promotes the highest standards of health, safety, and environmental behaviour.
8. Not tolerate unlawful workplace conduct, including abuse, harassment, discrimination (defined as the unjust or prejudicial treatment of people based on a legally protected

status), intimidation, unsafe working conditions, or coercion.

9. Not directly or indirectly participate in any form of forced or compulsory labour nor any forms of human trafficking.
10. Demonstrate commitment to the code by developing management systems, procedures, and assessments to ensure compliance with the Code and Communicating the requirements of this code, or their own Code of Ethics if substantially similar to this code, throughout their supply chain.

We are committed to a culture of transparency and encourage employees, contractors, suppliers, and other stakeholders to speak up about their issues and concerns. We strongly encourage any supplier who becomes aware of any circumstance or action that may not comply with this Supplier code of conduct to discuss these concerns with their NTA contact or report it via email to [compliance@flyNTA.com](mailto:compliance@flyNTA.com). If you have questions regarding this Supplier code of conduct or about our expectations of our suppliers and business partners, do not ignore it; let us know.