
Group Directive

Human Rights Directive

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1 Introduction

1.1 Purpose and Scope of Application

Beyond Gravity is committed to respecting and promoting human rights in all of our operations and supply chain. For this reason, Beyond Gravity establishes rules and guidelines embedded in a designated directive on human rights. The aim of this document is also to give an overview of the different human rights and connected topics, which are relevant for Beyond Gravity's business and operations. This Directive explains different requirements applicable to Beyond Gravity Group to ensure compliance with the international conventions on Human rights as well as other applicable regulations in Beyond Gravity's countries of operations. Beyond Gravity also sets its requirements and expectations for existing and future business partners as part of the business contracts.

This Group Directive applies to all legal entities of RUAG International Group, its employees and business partners. Until further notice, this document also applies to the companies and divisions of the Aerostructures business segment, even if only Beyond Gravity is referred to below. This Document is binding and sets a minimum standard.

Throughout this Document, all references to titles, functions and individuals shall include all genders.

1.2 Definitions / Abbreviations

Business Partners are customers, suppliers, service providers or other third parties, with which Beyond Gravity conducts business relationship.

Discrimination is categorized as direct and indirect. **Direct** discrimination occurs whenever a company's directives, regulations, procedures or other internal rules specifically target particular group of people because of the distinguished personal characteristics (such as age, gender, national origin, ethnicity, citizenship, religion, race, color, language, disability, organizational membership, opinion, marital status, sexual orientation and treats this group differently than others or worse by any distinction, exclusion or preference made on the basis of these characteristics. **Indirect** discrimination occurs when internal company rules negatively impacts a group of people or separate individuals.

Forced labor consists of work performed involuntarily under physical or psychological threats.

Human rights Universal rights inherent to all persons, regardless of nationality, sex, ethnic origin, color, religion, language, or any other status and include the right to life, food, education, work, health, and liberty.

Human trafficking is an illegal activity, which consists of the coercion, recruitment or abduction and transportation (often by persuasion and deception) of a person to unwillingly perform labor under inhumane conditions that include threats of violence, restrictions of the freedom of movement, indebtedness, confiscation of identity documents and papers, late or no payment wages.

ILO; International Labor Organization

Mobbing includes groups of people or separate individuals targeting others for the purpose of isolation, humiliation, dishonor, discreditation, degradation, crude jokes, insults, psychological terror and psychological or physical aggression.

The supply chain encompasses all activities in which raw materials are converted into finished goods and handed over to customers. This can include sourcing, design, production, warehousing, shipping and distribution.

UN, UNO: United Nations, United Nations Organization

2 Fundamental Human Rights

2.1 Policy Statement

Beyond Gravity recognizes the importance of human rights and is committed to respecting and promoting them in all our operations and activities. Respecting human rights is at the core of our business operations and is reflected by our internal governance practices, stakeholder engagement, training, and communication processes.

Beyond Gravity aims to conduct its business in ethical and sustainable way in all the spheres of its influence. This includes not only Beyond Gravity employees, but also customers and business partner throughout the value chain. Recognizing human rights' impact on our business, industry and operations is a key to becoming a sustainable market leader. Ensuring compliance with applicable national laws and international standards, also anchors trust and cooperation.

For these purposes, Beyond Gravity commits to comply with applicable laws and internationally recognized human rights, wherever the company operates. Where domestic and international laws conflict, the RUAG will adhere to the higher standard. The organization respects, at a minimum, the standards set forth in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Enhanced risks of human rights are often the case in conflict-affected areas. Beyond Gravity does not have business in conflict-affected areas, and expect the same from its business partners. Our business partners must ensure that their business dealings and supply chain are not involved in breaches of human rights, respecting the standards of international humanitarian law.

Beyond Gravity has created a separate Code of Conduct for Business Partners, which needs to be confirmed case by case by such Business Partners according to requirements of this Human Rights Policy.

2.2 Guiding Principles

2.2.1 Governance & Accountability

Beyond Gravity recognizes that respecting and advancing human rights in our value chain is an ongoing task and requires establishing an ongoing process.

The entire Executive Board demands to respect human rights. The General Counsel oversees all governance matters to sustain the necessary level of accountability.

Our efforts to identify and minimize the impact on human rights includes defining, internal processes and regulations and establishing monitoring and control systems that will ensure the necessary level of transparency and reporting mechanisms. These measures will be applicable for our internal stakeholders such as employees, representatives/consultants, supply chain workers, and temporary workers. These processes are also compulsory for our business partners subject to heightened human rights risks.

Beyond Gravity commits to conduct human rights impact assessments on its own operations as well as execute due diligence procedures on strategic partnerships. Such due diligence begins with assessing our business partners to evaluate and scale the impact of their activities and remedial measures.

The key task is to ensure a transparent reporting on progress and challenges, e.g., report on Beyond Gravity's most relevant risks to human rights, including how we are addressing those risks and measures taken to mitigate or minimize existing or potential impacts. Such reporting will be a part of our ESG reporting framework and program integrated in the Enterprise Risk Management process.

Building human rights awareness is an important keystone that will allow us to improve how we communicate our commitments to different stakeholders and business partners. For this purpose, Beyond Gravity commits to provide internal training and communication on human rights to relevant stakeholders using "train the trainer" methods and other learning platforms which have proven their effectiveness.

Beyond Gravity has a reporting platform on its internet website and on the internal website (intranet) for employees' grievances or third party concerns in place and follows procedures to deal with any upcoming reports regarding compliance violations and explicitly violations of this Human Rights Directive. Reporters are able to submit their concerns anonymously if they wish.

2.2.2 Risk Assessment & Integration

Beyond Gravity is committed to establishing clear lines of accountability for human rights by ensuring that clear procedures of due diligence are carried out throughout the organization, as well as by our business partners.

We will ensure that all employees and stakeholders are aware of our requirements and what their roles and responsibilities in adhering to the requirements are. All rules and regulations, including other directives, will integrate human rights considerations where necessary, and other human rights considerations and requirements will be integrated in the decision-making processes throughout the organization.

We are committed to continuously assessing potential human right risks associated with our operations, supply chain, products, and services. Beyond Gravity will also consider the specific contexts and characteristics of the regions and countries where we operate, including local laws, customs, and social dynamics.

2.2.3 Breaches

If Beyond Gravity is made aware of any adverse human rights impacts, appropriate actions and measures will be taken to remediate these impacts and prevent them from recurring. Mechanisms to report grievances and other misconducts by employees or other third parties concerned are in place. The respective whistleblower - platform is publicly available at Beyond Gravity's website and on the internal website (intranet), allowing a user of this platform to also issue the report anonymously.

2.3 Specific Requirements

2.3.1 Children rights, child labor including minimum working age

RUAG requires that no child labor is used in its operations as well as within its supply chain.

No child under the age defined by ILO Minimum Age Convention shall be admitted to employment or work in any occupation. The minimum age shall not be less than the age of compulsory schooling and in accordance with Articles 2, 3 and 9 of the Convention. At a minimum, the age for admission to any type of employment or work shall not be less than 18 years, unless explicitly allowed otherwise under local labor laws.

Work done by children and young persons in schools for general, vocational or technical education or in other training institutions, where such work is carried out in accordance with conditions prescribed and approved by the competent authorities (e.g., such as apprenticeships of young persons to gain professional skills for their future careers during usual education and schooling) is permitted.

2.4 Ban on forced labor

Beyond Gravity undertakes and requires suppressing the use of forced or compulsory labor in all its forms as well as to adhere to provisions of national laws and regulations concerning forced labor and where national law is insufficient, take account of international standards. Beyond Gravity ensures that no employee may be compelled to conditions of forced labor nor is subject to employment contracts that imply forced labor conditions. Beyond Gravity does not use or benefit from prisoners' labor or similar forms of labor.

Beyond Gravity ensures that employment contracts are fair, transparent and understood by employees, including but not limited to stating the terms and conditions of employment, freedom to leave (incl. appropriate procedures), institute policies and procedures to prohibit the requirement that workers lodge financial deposit with the company and other means.

2.5 Working conditions, health, and safety at workplace

Beyond Gravity ensures that wages, benefits, working hours and other conditions of work correspond the minimum required standards in countries of its operations. Beyond Gravity ensures that each employee has a written employment contract or equivalent as defined by the local legislation, with agreed clear terms and conditions. . It is understood that Beyond Gravity strives to establish wages that will ensure adequate standard of living for its employees and their dependents, aligned with local markets practices.

Holidays, sick leaves, and parental leaves are granted to all employees for the period of and according to the requirements set in national legislations of Beyond Gravity's countries of operations.

Beyond Gravity sets itself the high standards of safety and health as a cornerstone of a successful business. Therefore, Beyond Gravity commits to providing safe and healthy working conditions and take appropriate precautionary measures to protect employees from work-related hazards and dangers in the workplace. For these purposes, Beyond Gravity established a detailed Health and Safety organization responsible for ensuring all safety requirements.

2.6 Freedom of associations and bargaining

Beyond Gravity ensures that all its employees have a possibility to form and join trade unions and to bargain collectively, without fear of reprisal or intimidation. Beyond Gravity ensures that under no circumstances will employees be terminated or discriminated against in retaliation for exercising employees' rights, submitting grievances or reporting suspected violations and participating in union activities. Beyond Gravity shall engage in collective bargaining and holds regular consultation with authorized employees' representatives concerning working conditions, remuneration, disputes resolution and other internal matters and matters of mutual consent. Beyond Gravity expects trade unions, in reverse, to negotiate in good faith and maintain pragmatism in finding solutions that benefit both company and employees.

Where no trade unions exist, Beyond Gravity shall adopt a neutral view and shall not prevent employees from promoting their rights and organizing in the unions.

2.7 Non-discrimination, diversity, and inclusion

Beyond Gravity recognizes that the workplace must be a place free from discrimination and ensures that its own workplace is free of discriminatory practices and the individuals, responsible for following such practices, are held accountable.

Beyond Gravity commits to assigning responsibility for equal employment issues, define company-wide policies and procedures for equal employment practices as well as to provide staff training on non-discrimination practices.

Beyond Gravity does not engage, support, or allow any form of discrimination, harassment (both physical and psychological) or any kind of abuse in the workplace. Beyond Gravity does not tolerate any kind of sexual harassment.

Breaches of these requirements are subject to disciplinary measures. These, however, must always be in accordance with the measures and procedures set in applicable national legislation. Beyond Gravity does not tolerate the use of corporal punishment, physical or mental coercion, verbal abuse or other aggressive or humiliating behaviors towards employees as corrective measures.

Beyond Gravity encourages and supports efforts to build a climate of tolerance and equal access to opportunities for occupational development. Beyond Gravity strongly believes that equality and diversity are a key to success. Therefore, Beyond Gravity ensures equal remuneration of all genders for work of equal value. Beyond Gravity commits to promote objective performance and job appraisals on the basis of the work performed or to be performed. Differential rates between workers which correspond, without regard to sex, to differences, as determined by such objective appraisal, in the work to be performed shall not be considered as being contrary to the principle of equal remuneration for men and women workers for work of equal value, as stated by ILO Convention on Equal Remuneration.

2.8 Supply Chain Considerations

All suppliers that Beyond Gravity Engages are assessed to identify potential human rights risks and impacts associated to them. This due diligence is performed by an integrated supplier tool that performs detailed reviews using both public and non-public information to provide individual risk assessments on each of the suppliers. The tool further supports in performing monitoring activities that helps determine ongoing compliance with human rights requirements.

Beyond Gravity ensures that its supply chain commits itself to the requirements of this directive. A Supplier Code of Conduct has been developed that outlines the requirements that our suppliers and their subcontractors need to follow. These include, but are not limited to, prohibiting forced labor, child labor, discrimination, and other human rights abuses as required by law. The Code of Conduct for Suppliers also necessitates that Beyond Gravity's Suppliers require their supply chain to adhere to the same requirements.

3 Legal Basis

This Group Directive is based on

- Article and 22.2 of the RUAG International Company Code 1 September 2023
- RUAG International Code of Conduct 2020

The Group Directive "Group Document Control" (BG/DR0001en) always applies.

4 Final Provisions

4.1 Approval

This Group Directive has been submitted to and approved by the Owner on 24. August 2023.

4.2 Publication

This Document shall be published on the Beyond Gravity Intranet prior to the Effective Date.

4.3 Validity and period of validity

This Document becomes effective on 1. September 2023.

This Document shall be valid until revoked and be revised by the Author latest by end of 2026.

4.4 Non-compliance

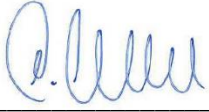
Non-compliance with this Document may result in disciplinary action in accordance with the labour legislation applicable in the respective concerned country.

4.5 Contact

For advice, raising doubts & concern and reporting misconducts, please contact the Author or Compliance.

4.6 Signatures

Signatures of the responsible persons:



André Wall
CEO RUAG International



Remigius Fent
General Counsel