



Supplier Code of Business Conduct

AvtechTye is committed to integrity and compliance in everything we do. As part of that commitment, AvtechTye expects its suppliers to ensure that they provide their employees a safe working environment, that they treat their workers with dignity and respect, that they engage in environmentally sound and sustainable manufacturing processes, and that they comply with the law in all countries in which they conduct business. Suppliers are expected to foster a culture where employees and managers can communicate openly and raise concerns without fear of retaliation, intimidation, or harassment.

Our Supplier Code of Business Conduct sets forth AvtechTye commitment to integrity and compliance within its global supply chain. We expect all of our suppliers to adhere to the Supplier Code and to ensure these requirements are followed within their supply chain. AvtechTye may visit (and/or have external monitors visit) supplier facilities, with or without notice, to assess compliance with the Supplier Code. Adherence to the requirements set forth in the Supplier Code will be considered in making sourcing decisions. Failure to comply with the Supplier Code of Business Conduct may result in termination as a supplier and possible legal action.

I. Labor and Human Rights

1. Fair Treatment

Suppliers shall commit to a workplace free of harassment and unlawful discrimination. Examples of conduct that could be characterized as “harassment” include, without limitation, threatening or subjecting workers with harsh or inhumane treatment, sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse, and unreasonable restrictions on entering or exiting company-provided facilities.

2. No Involuntary Labor or Human Trafficking

Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. Compliance with FAR 52.222-50 is a requirement.

As part of this commitment to prohibiting human trafficking, Suppliers may not engage in any of the following conduct:

1. Destroying, concealing, or confiscating identity or immigration documents;
2. Using fraudulent recruiting tactics; or
3. Charging employees unreasonable recruitment fees or providing inadequate housing based on local standards, laws and directives.

3. No Child Labor

Child labor is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be 16 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. This Supplier Code does not prohibit participation in legitimate workplace apprenticeship programs.

4. Wages and Benefits

Suppliers shall pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition, workers shall be compensated for overtime hours at the rate required by applicable laws and regulations.

5. Subcontractor Compliance

Suppliers agree that any workers supplied by subcontractors to work at the Supplier's facilities will be treated in a manner consistent with the principles set forth in this Supplier Code.

II. Health and Safety

Suppliers shall comply with all applicable health, safety and environmental laws and regulations. Suppliers should address the following in their health and safety programs:

1. Occupational Safety

Suppliers shall commit to the safety and health of their employees, and shall ensure that required training of personnel has been completed prior to initiating any work activity. Suppliers should have or subscribe to a written safety and health program. Suppliers are responsible for addressing and controlling worker exposure to potential safety hazards in conformance with all applicable standards and/or regulations and by utilizing suitable means, *e.g.*, design, engineering and administrative controls, preventative maintenance, training, work procedures, and appropriate personal protective equipment.

2. Emergency Preparedness

Suppliers shall have emergency plans and response procedures that implement all applicable laws and regulations regarding: emergency preparedness, reporting and notification; evacuation procedures, training and drills; appropriate hazard detection and suppression equipment; and adequate exit facilities from suppliers' sites.

3. Occupational Injury and Illness

Suppliers shall have procedures and systems to manage, track and report occupational injuries and illnesses, and exposure of workers to chemical, biological and physical agents. These procedures and systems shall implement all applicable laws and regulations, including, as applicable, provisions to (i) encourage worker reporting, (ii) classify and record injury and illness cases, (iii) investigate cases, and (iv) implement corrective actions.

III. Environmental

Suppliers shall comply with all applicable health, safety and environmental laws and regulations when conducting business. By way of example, suppliers shall:

1. Obtain and keep current all required environmental permits and registrations;
2. Reduce, control and/or eliminate wastewater, waste and pollution at the source;
3. Reduce, control and/or eliminate air emissions of volatile chemicals, corrosives, particulates, aerosols and combustion products;
4. Conform to applicable labeling and warning requirements; and
5. Identify, manage, store, move and handle hazardous substances in accordance with law.

IV. Integrity and Compliance

1. Books and Records

Suppliers are expected to create and maintain accurate books and records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, records should still be retained based on applicable retention requirements.

2. Business Integrity

Suppliers shall comply with the laws and regulations of all applicable jurisdictions, including all applicable anticorruption laws. Suppliers may not solicit, give or receive commercial bribes or unlawful kickbacks and must be careful to avoid even the appearance of such improper conduct. Suppliers will conduct their businesses without engaging in corrupt practices and will not take advantage of anyone through unfair dealing practices. This means that suppliers will not misrepresent the quality, features or availability of their products or service. Suppliers also agree to maintain integrity, transparency and accuracy in corporate record keeping.

3. Protection of Intellectual Property

Suppliers shall respect intellectual property rights and safeguard proprietary information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.

4. Substance Abuse

Suppliers shall have policies and procedures in place to ensure that employees do not conduct work while under the influence of alcohol, illegal drugs, or misused medications, whether prescription or non-prescription. In addition, suppliers will put in place policies and procedures that prohibit employees from

using, possessing, transferring or selling illegal drugs or alcohol or misused medication (whether prescription or non-prescription) while at work or while on the job.

5. Responsible Sourcing of Minerals

Suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly, indirectly finance, or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available upon request.

6. Quality

Suppliers shall take due care to ensure their work product meets 8801QS quality standards. Suppliers shall put in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements. Suppliers shall develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

7. Privacy and Information Security

Suppliers are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers shall protect confidential and proprietary information, including confidential and proprietary information of others and personal information, from unauthorized access, destruction, use, modification and disclosure,

through appropriate physical and electronics security procedures. Suppliers are to comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

V. Management System

Suppliers shall adopt and implement a management system to comply with the principles set forth in this Supplier Code OF Business Conduct. Management Systems will vary from supplier to supplier based upon the size and scope of the business and risks. The management system will be designed to ensure (a) compliance with applicable laws, regulations and customer requirements; (b) conformance with this Supplier Code; (c) mitigation of risks, and (d) a process to track measure and drive improvements in the management system.

The management system should contain at a minimum the following elements:

- **Company Commitment and Management Accountability** through policy statements affirming the supplier's commitment to compliance and identifying a company representative[s] responsible for ensuring implementation of the management systems.
- **Risk Assessment and Risk Management** process to identify risks associated with the supplier's operations. As regulations continue to change and emerge, the supplier's management system should include a process to monitor and track regulatory activity that may affect its business and that of its customers relating to, but not limited to, environmental, restricted material usage, conflict minerals and hazardous waste.

- **Training Programs** for training managers and workers to implement the supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.
- **Standards, Audits and Assessments** to ensure conformity to legal and regulatory requirements, the content of the Supplier Code and customer contractual requirements.
- **Corrective Action Process** for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.
- **Documentation and Records** to ensure compliance with the principles of this Supplier Code.
- **A Process to Communicate Supplier Code Requirements to Suppliers** and monitor supplier compliance to the Supplier Code of Conduct.