

CODE OF BUSINESS ETHICS AND CONDUCT FOR SUPPLIERS OF MB AEROSPACE

MB Aerospace Group (“MB Aerospace” or the “Company”) as always been committed, and remains committed, to conducting business in full compliance with all applicable federal, state, and local laws and regulations.

It is a critical objective that, as we sustain and grow our business, we preserve our core values and protect our reputation together with our suppliers, consultants, agents, representatives, and partners (collectively referred to as “Suppliers”). But simply complying with the letter of the law is not enough. All Suppliers must conduct their business with MB Aerospace in an ethical and proper manner. In all actions, Suppliers must strive for the highest level of integrity in dealings with MB Aerospace and with its various stakeholders. Every Supplier has an obligation to always behave with honesty and propriety because such behavior is morally and legally correct and because MB Aerospace’s business success depends on the trust and confidence of everyone with whom the Company deals.

The standards set forth in this Code of Business Ethics and Conduct for Suppliers (the “Supplier Code”) are the minimum standards that all MB Aerospace Suppliers must meet to conduct business with MB Aerospace.

1. COMPLIANCE WITH LAWS AND REGULATIONS.

a. General Compliance. All MB Aerospace Suppliers must comply with the legal requirements and standards of their industry, the national laws and regulations of the countries in which they do business, as well as any applicable U.S. and/or U.K cross-border “long-arm” laws and regulations.

b. Product Facility and Process Security. The U.S. Customs and Border Protection Agency (“CBP”) has initiated the Customs–Trade Partnership Against Terrorism (“C-TPAT”) to protect the security of cargo entering the United States without interfering with the flow of trade. Through C-TPAT, CBP asks businesses to ensure the integrity of their supply chain security practices, and to communicate certain security guidelines throughout their supply chain. Suppliers shall take all steps necessary to maintain the security of facilities where MB Aerospace products are manufactured or where MB Aerospace processes are exercised or maintained in accordance with the directives of MB Aerospace Group, Inc. and consistent with the security procedures and processes recommended by CBP as part of C-TPAT. All Suppliers must comply with these



guidelines when shipping to MB Aerospace or its shipping and receiving agents in the United States.

c. Marking and Shipping. All products and/or material shall be accurately marked or labeled with the country of origin (“COO”) in compliance with applicable laws and including those of the country of manufacture (“COM”). Suppliers of finished products that are marked “Made in USA” or similar, or by virtue of their design or packaging imply that they are “Made in USA” shall comply in all respects with the U.S. Federal Trade Commission Guidelines regarding product marking. To facilitate MB Aerospace’ compliance with the U.S. Federal Trade Commission Guidelines, Suppliers of component parts or commodities shall provide a declaration of origin in a form and detail satisfactory to MB Aerospace.

d. Data Security: To respect privacy rights and secure the data of MB Aerospace employees, customers, and Suppliers (collectively, “MB Aerospace Data”), Suppliers must implement and maintain physical, organizational and technical measures to ensure the security and confidentiality of MB Aerospace Data to prevent accidental, unauthorized or unlawful destruction, alteration, modification or loss of MB Aerospace Data, misuse of MB Aerospace Data, or unlawful processing of MB Aerospace Data; and to protect Supplier operations and facilities against exploitation by criminal or terrorist individuals and organizations.

e. Invoicing: Suppliers must provide required invoices and documentation to MB Aerospace in compliance with applicable legal requirements. All costs and charges must be recorded and charged in an accurate and complete manner. All Company records must reflect the transactions they record Suppliers shall comply with all international trade, customs, import and export requirements and restrictions and/or prohibitions with respect to trade with certain countries, regions and/or individuals.

f. Conflict Minerals and REACh Reporting. Supplier shall provide to the Company the identity of its suppliers, and/or the location of manufacture of the Goods or any subcomponents of the Goods, as applicable, the substances compromising any Goods, subcomponents or services to confirm compliance with legal and regulatory requirements; namely Conflict Minerals and EU REACh.

2. PRODUCT QUALITY AND CONTRACT COMPLIANCE



a. Product Quality: MB Aerospace is committed to developing, manufacturing, and delivering quality products that meet all contractual obligations and quality standards. Supplier shall not deliver products that:

- Are made from lower quality materials than those ordered,
- Are not properly tested,
- Contain foreign-made materials when domestic materials are specified,
- Fail to meet contract specifications, or
- Include substituted materials unless permitted by law and allowed by the contract or agreed to in writing by the customer.

b. Compliance with Contract Requirements: MB Aerospace's policy is to adhere strictly to contract requirements. To achieve this objective, Suppliers must understand the contract requirements and then communicate the requirements to those responsible for contract performance. Such contract requirements include, but are not limited to, billing requirements, material design specifications, mandated inspections, contract quality standards and packaging requirements.

3. EMPLOYMENT PROCEDURES.

a. Work Environment and Working Hours. Suppliers shall provide their employees with safe and healthy working conditions, including access to appropriate PPE, safety equipment, and have effective environmental, health and safety protocols. Facilities should be built and maintained in accordance with the standards set by applicable laws. Supplier's staff should be adequately trained to perform their jobs safely. Suppliers shall maintain reasonable employee work hours in compliance with local standards and applicable national laws of the countries in which Suppliers do business. Employees shall not work more hours in one week than allowable under applicable law, and shall be compensated for overtime work consistent with applicable law and, at the end of employment, shall be reimbursed return transportation costs if they have been recruited from outside the Supplier's country.

b. Fair Compensation. Suppliers shall fairly compensate their employees by providing wages and benefits which are in compliance with the national laws of the countries in which Suppliers do business. Suppliers shall fully comply with the wage and hour provisions of the U.S. Fair Labor Standards Act, if applicable, and shall use only subcontractors who comply with this law, if applicable.



c. Labor. Suppliers shall maintain employment on a voluntary basis and are not permitted to use prisoner or forced labor. Furthermore, Suppliers are not permitted to use child labor. The term “child” refers to any person under the minimum legal age for employment where the work is performed.

d. Disciplinary Actions. Suppliers shall treat their employees with respect and dignity. Suppliers must provide a work environment free of physical punishment or abuse in any form.

e. Non-Discrimination/Human Rights. MB Aerospace believes that all terms and conditions of employment should be based upon an individual’s employment ability, not on the basis of personal characteristics or beliefs. Suppliers should not discriminate against their employees in hiring practices or any other term or condition of work on the basis of any characteristics that may be protected by applicable law, such as age, color, disability, gender, national origin or geographic background, race, religion, marital status, sexual orientation, veteran status or citizenship. The Supplier shall, at all times, comply with the Modern Slavery Act of 2015 (UK). In particular, the Supplier shall not use any form of forced, bonded, compulsory labour, slavery or human trafficking.

4. ENVIRONMENTAL PROCEDURES. Suppliers should provide materials and/or products to MB Aerospace and conduct their business in a way that supports and safeguards the environment in accordance with applicable laws and regulations. Suppliers are encouraged to use recycled and non-toxic materials where possible, to purchase wood and wood products originating from Certified Well-Managed Forests™ where reasonable, and to promote the proficient and responsible use of wood and wood products.

5. PROPRIETARY INFORMATION. All Suppliers are required to keep all trade secrets, designs, data, know-how or other information confidential which the Supplier knows or should know is considered proprietary by MB Aerospace or MB Aerospace’s customers including, but not limited to, designs, sketches or prototypes for products that have not yet been introduced, engineering drawings, the financial or business terms of any agreement between the Supplier and MB Aerospace, information concerning MB Aerospace sales and marketing plans, and any other information that is not freely available to the public.

6. ANTI-BRIBERY AND GRATUITIES. Any payment of cash or cash equivalents (gift certificates,



etc.) by a Supplier to any MB Aerospace employee is strictly prohibited. The Supplier shall and shall procure that persons associated with it or other persons who are involved in any way with MB Aerospace, at all times, comply with any applicable anti-bribery legislation including but not limited to the Foreign Corrupt Practices Act and the UK Anti-Bribery Act, as amended and updated from time to time. The Supplier agrees that it will not hire an agent, or consultant without the Company's prior written consent (to be based on adequate due diligence).

7. AUDIT RIGHT AND ANNUAL CERTIFICATION. MB Aerospace has the right to audit the Supplier which may include, but is not limited to, a review of the financial relationship between the Supplier and its vendors, subcontractors and related entities. The Supplier shall fully cooperate with any ethics and compliance investigation. MB Aerospace requires its Suppliers to allow MB Aerospace or its representatives to inspect and audit their facilities, to complete questionnaires or surveys when requested, and otherwise to cooperate with MB Aerospace' efforts to maintain adherence with this Supplier Code. In particular, the Supplier permits a full review of all FCPA-related compliance procedures including those for meeting with foreign governmental officials and compliance related training. The Supplier shall provide the Company with an annual certification stating that the foreign business partner has not engaged in any conduct that violates this Code, the FCPA or any applicable anti-bribery laws, nor is it aware of any such conduct.

8. CONSEQUENCES OF NON-COMPLIANCE. MB Aerospace Suppliers are responsible for fully implementing this Supplier Code into its business practices and corporate policies. A Supplier's non-compliance with this Supplier Code shall give MB Aerospace Group cause to terminate for default the relevant contract or purchase order with that Supplier.

9. ETHICS REPORTING. If a Supplier observes a possible problem, has a concern or question relating to this Code, or if you are not sure what is right in a particular situation, you are requested to submit your concern to MB Aerospace Group Ethics Hotline. The Ethics Hotline is available 24 hours a day, 7 days a week. It is answered by an independent third-party provider and accommodates the languages commonly used in the jurisdiction in which MB Aerospace operates. MB Aerospace will take all appropriate steps to preserve the confidentiality and identity of anyone who makes a report or raises a concern in good faith.



Contact details for the Ethics Hotline are listed below:

Dial toll-free, within the United States, Guam, Puerto Rico and Canada: 844-428-0163

Dial toll-free, within Poland (OneConnect): 0-0-800-4911989

Dial toll-free, within Taiwan (OneConnect): 0801491594

Dial toll-free, within the United Kingdom (OneConnect): 0800 090 3376

MB Aerospace relies on its Suppliers' integrity and continued commitment to the principles outlined in this Code. Thank you for doing your part to maintain an ethical environment at MB Aerospace.

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