



STANDARDS OF ETHICAL BUSINESS CONDUCT

AN OVERVIEW OF THE ETHICAL PRINCIPLES THAT GOVERN DECISIONS AND BEHAVIORS OF NORDAM SUPPLIERS



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NORDAM CORE VALUES

NORDAM stands behind our four core values that shape our Culture Compass: Family, Service, Excellence, and Leadership.

When we make decisions at NORDAM, one deeply-felt question is always at the forefront: What would we want for our own families?

Think about it: You want your family to be safe and healthy and enjoy a secure future. *That's what we want for NORDAM, too.*

This family-first approach to doing business, in tandem with the values depicted in our Culture Compass, creates the ideal environment for us to achieve our vision of being the premier family-owned aerospace company. It's a vision that can only be achieved by offering the highest quality work, delivered on time and with best-in-class customer service.

We are committed to achieving those expectations and expect our third-party suppliers, vendors, and partners to do the same. Our Standard for Ethical Business Conduct ("Standard") sets these standards for those we do business with and echoes our standards.

We appreciate your shared commitment to these values and ethics.



- **FAMILY:** We foster a safe and healthy work environment to secure our future.
- **SERVICE:** We put people first, with hearts that give back.
- **LEADERSHIP:** We communicate clearly, we're accountable to meet our commitments and we do what we say we're going to do.
- **EXCELLENCE:** We follow the process to the Nth degree, relentlessly pursuing excellence, always learning, always improving.

And never lose sight of our shared goal: **We Fly Families Safely.**

GOVERNANCE

CODE OF CONDUCT & LOWER TIER SUBCONTRACTOR SUPPLIERS

NORDAM expects our third parties to have management systems to support compliance with laws, regulations, and expectations related to or addressed expressly within this Standard.

If not already in place, we encourage our third parties to implement their own written code of conduct and to flow down the principles of their code of conduct to the entities that furnish goods and services.

CONTRACTS, LAWS & REGULATIONS

We expect our third-party suppliers, vendors, and partners (“Suppliers”) to perform all duties and expectations in compliance with all laws and regulations applicable to their business.

Suppliers must comply with all flow down terms, conditions, and other provisions specified in contractual agreements with NORDAM and purchase orders from NORDAM.

When performing international business, and/or if the primary place of business is outside of the United States, Suppliers must comply with local laws and regulations.

ENVIRONMENTAL RESPONSIBILITY

We expect our Suppliers to manage environmental risk actively, conserve natural resources, prevent pollution, and protect the environment.

We expect our Suppliers to apply environmental management principles and establish a systematic approach to the management of risks, hazards, and opportunities associated with the environment.

For example, identify potential risk and reputational loss from regulatory non-compliance and identify opportunities for business growth through operational and product stewardship.

SUPPLIER DIVERSITY

As supply chain requirements vary by country, our Suppliers should be mindful that we may have customer-directed Supplier inclusion goals. When applicable, those goals may necessitate in-country supply channel providers both by our Suppliers and by us.

These may be defined as a small business; small disadvantaged business; woman-owned small business; HUBZone certified business; veteran-owned small business; service-disabled veteran-owned small business; small/medium size business; or aboriginal business.



EMPLOYMENT PRACTICES

NON-DISCRIMINATION

We expect our Suppliers to provide equal employment opportunities to employees and applicants for employment without regard to race, ethnicity, religion, color, sex, pregnancy, national origin, age, military veteran status, ancestry, sexual orientation, gender identity, or expression, marital status, family structure, genetic information, any characteristic protected by state or local law, or mental or physical disability when the essential functions of the job can be performed with or without reasonable accommodation.

HARASSMENT

We expect our Suppliers to ensure that employees may perform their work in an environment free from physical, psychological, and verbal harassment or other abusive conduct.

DRUG-FREE WORKPLACE

We expect our Suppliers to maintain a workplace free from illegal drugs. We expect our Suppliers to follow any laws or regulations regarding drug and alcohol use, including the unlawful use, possession, sale, or distribution of controlled substances or illicit substances.

EMPLOYEE HEALTH & SAFETY

We expect our Suppliers to comply with applicable health and safety laws, regulations, policies, and procedures; and to provide for the health, safety, and welfare of their employees, visitors, and others who may be affected by their activities.

SOCIAL RESPONSIBILITIES

HUMAN RIGHTS

We expect our Suppliers to treat people with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity for all, and help create an inclusive and ethical culture. We expect our Suppliers to ensure that any person performing work is of the minimum legal age for employment where the work is being performed.

HUMAN TRAFFICKING

We expect our Suppliers to not engage in the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons through threat, force, coercion, abduction, or fraud for exploitation.

CONFLICTS OF INTEREST

We expect our Suppliers to avoid all conflicts of interest or situations which could give the appearance of a potential conflict of interest in their dealings with NORDAM.

We expect our Suppliers to report to NORDAM any potential or apparent conflicts between their personal interests and the interests of NORDAM.

COUNTERFEIT PARTS

We expect our Suppliers to implement and maintain processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective methods should be in place to detect counterfeit parts and materials and mark parts obsolete as appropriate.



ACCOUNTABILITY & INTEGRITY

ACCURATE RECORDS & FINANCIAL RESPONSIBILITY

We expect our Suppliers to maintain accurate records and report business documentation, including but not limited to financial accounts, quality reports, time records, expense reports, resumes, and submissions to NORDAM, customers or regulatory authorities.

PROTECTING INFORMATION

Our Suppliers must adequately protect the information, including any company's confidential, proprietary, controlled unclassified, export controlled, U.S. Government classified, and personal information.

Information maintained on electronic systems should be protected against cyber intrusions and other unauthorized use or access through appropriate physical and electronic security procedures.

NORDAM information may only be used in accordance with the contractual agreement with NORDAM.

GIFTS & BUSINESS COURTESIES

NORDAM competes on the quality of our products and services and does not use the exchange of business courtesies to gain an unfair competitive advantage. We expect the same of our Suppliers in the offering or re-

ceipt of any gift or business courtesy, including cash and cash equivalents.

Our stakeholders involved in procurement decisions are subject to limitations. They may not accept any business courtesies, except very low-value promotional items.

In any business relationship, our Suppliers must ensure that the offering or receipt of any gift or business courtesy:

- Is permitted by law or regulation
- Does not violate the rules and standards of the recipient's organization
- Is consistent with reasonable marketplace customs
- Will not adversely impact the reputation of NORDAM

FAIR COMPETITION & ANTITRUST

We expect our Suppliers to conduct business in accordance with all applicable antitrust or competition laws and regulations.

This includes avoiding business practices such as entry into arrangements that unlawfully restrain competition, improper exchange of competitive information, price-fixing, bid-rigging, or improper market allocation.

GOOD CORPORATE CITIZENS

ANTI-CORRUPTION

NORDAM has zero-tolerance for corruption and prohibits anyone conducting business on our behalf from offering or making improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes the offer or receipt of any bribe or kickback to or from any customer, supplier, or others.

We expect our Suppliers to adhere to all provisions of the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, including the prohibition of any illegal, improper, or corrupt payments. Except to the extent inconsistent with U.S. law, our Suppliers must comply with the anti-corruption laws that govern operations and prohibit bribery and corruption in business dealings in the countries in which they do business.

EXPORT & IMPORT CONTROL

NORDAM expects our Suppliers to ensure that their business practices comply with all applicable laws and regulations governing the export and import of domestic and foreign origin parts and components and related technical data. Suppliers shall provide complete and accurate information and obtain export licenses and/or authorizations when necessary.

CONFLICT MINERALS

We expect our Suppliers to take steps to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if found, implement supply chain due diligence processes to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.



REPORTING

ANTI-RETALIATION & WHISTLEBLOWING

NORDAM expects Suppliers to provide employees and its third parties with access to adequate reporting channels to seek advice or raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting.

NORDAM expects Suppliers to take action to prevent, detect and correct retaliatory actions when reported.

The business relationship may be reviewed and corrective action pursued subject to the terms of the related

procurement contract(s), in the event that the expectations of this Standard are not met.

NORDAM's Helpline is available to Suppliers and their employees as means to report areas of bribery, human rights, environment and health and safety and product safety as related to NORDAM.

NORDAM ETHICS & GLOBAL TRADE DEPARTMENT

Please feel free to contact the NORDAM Ethics & Global Trade department with questions or comments about this Standard.

How to Contact **ETHICS & GLOBAL TRADE**

WRITE

NORDAM
Attn: Ethics & Global Trade
6910 North Whirlpool Drive
Tulsa, OK 74117

CALL

918-878-4100

EMAIL

ASKCompliance@NORDAM.com

Toll-Free & Confidential **NORDAM ETHICS HELPLINE**

USA

1-866-549-4983

MEXICO

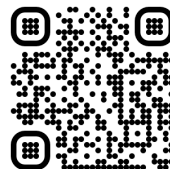
800 099 1195

UNITED KINGDOM

0800 820 3449

ONLINE

[HTTPS://NORDAM.ALERTLINE.COM](https://NORDAM.ALERTLINE.COM)



NOTE: NORDAM's Helpline is available 24 hours a day/seven days a week, and has translation services available.



SUPPLIER COMMITMENT

As a Supplier of NORDAM, you and your employees, consultants, representatives and subcontractors agree to comply with the principles of this NORDAM Standard for Ethical Business Conduct either by applying this NORDAM Standard for Ethical Business Conduct or by ensuring that you have your own code of conduct and current supply chain sustainability practices, which align with principles set out in this NORDAM Standard for Ethical Business Conduct.

Supplier shall take the necessary actions required to flow down the NORDAM Standard for Ethical Business Conduct principles to affiliates, subsidiaries and subcontractors supporting or engaging on program that involves NORDAM.

The principles set forth in this NORDAM Standard for Ethical Business Conduct shall be incorporated into Supplier's routine sustainable business practices.

Supplier shall adhere to this NORDAM Standard for Ethical Business Conduct and understands that it is part of the criteria that will be assessed during the selection process and any supplier reviews or audits.

Supplier accepts that this document shall be a commitment to the principles set out herein for all existing contracts (if any), and for all business and contractual relationships with NORDAM.

This NORDAM Standard for Ethical Business Conduct is the minimum standard of best practices.





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