PCX AEROSTRUCTURES, LLC

EXTERNAL PROVIDER CODE OF CONDUCT

COMPLY WITH THE LAW

PCX Aerostructures LLC is committed to the highest standards of ethics and business conduct. As such, it is our expectation that all of our external providers (suppliers, contractors, and interns) comply with the letter and spirit of every applicable law or regulation in each country and locality in which we/they operate. Each of our external providers is responsible for understanding the laws and regulations that relate to the Purchase Order provided by PCX. These include the following:

- Competition and Antitrust Laws – Competition and antitrust laws generally prohibit conduct with competitors, suppliers or customers that constitutes unlawful restraint of trade.
- Laws Governing International Activities – If you are involved in exports, including the transmission of technical data via the Internet or other electronic means, be familiar with export laws and specific export prohibitions. PCX and our external providers are prohibited from taking any action in support of an international boycott not sanctioned by the U.S. government.
- Employment Laws – Equal opportunity must be provided in all employment practices. Seek to ensure that each person is treated with fairness and dignity. Provide a work environment that is free from all forms of illegal discrimination or harassment.
- Occupational Health and Safety, Environmental and Other Regulatory Laws – Commit to providing a healthy and safe work environment for your employees and all PCX products and services. Do not condone illegal drug use or abuse of alcohol. Respect and protect the environment and adhere to environmental laws and regulations.

PROTECT CONFIDENTIAL INFORMATION

Data, information and documents pertaining to PCX and our customers may be used only in the performance of that contract and may not be disclosed or communicated to persons outside PCX unless they need the information in connection with their business relations with PCX, or as may be required by law. Comply with all applicable data protection laws.

DO NOT MAKE OR ACCEPT IMPROPER PAYMENTS OR GIFTS

Improper payments include anything of more than nominal value given to any person to obtain preferential treatment for PCX employees or our customers. Do not solicit or accept gifts or favors and do not give gifts or favors of more than nominal value to persons who deal or seek to deal with PCX.

RESPECT PCX AND EACH OTHER

Respect for PCX means not only avoiding misuse of company funds and property, it includes identifying misuse and waste by others, creating and maintaining accurate books and records, complying with our records retention policy. Respect for others means respecting their property, their dignity, self-esteem and their contributions to the overall success of PCX and its external providers.

ACT WITH THE HIGHEST STANDARD OF ETHICS AND INTEGRITY

PCX requires that each person conducts business with the highest standards of ethics and integrity. We expect our team, including external providers, to assure product or service conformity, product safety, and behave in an ethical manner. Even where conduct is legal, or not legally restricted, always be confident that the actions taken are honest and ethical.

IMPLEMENTATION

Adherence to this Code is the obligation of all PCX external providers. If you become aware of a situation that you believe may be in conflict with the Code, you should contact your manager or your Human Resources representative immediately, or alternatively, you may make a confidential and anonymous report to the PCX Compliance Department. Confidential and anonymous compliance reports can be made by mailing a report to:

PCX Compliance Department, Human Resources

300 Fenn Road, Newington, CT 06111

PCX AEROSYSTEMS

COMPANY HEADQUARTERS

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