

BBA Aviation Global Engine Services Code of Ethics Suppliers, Contractors and Consultants

BBA Aviation Global Engine Services is committed to conducting business fairly, impartially and in an ethical and proper manner. We support the protection of human rights around the world and are guided by fundamental principles such as the U.N.'s Universal Declaration of Human Rights and applicable law, including the Modern Slavery Act 2015. Our employees, officers and directors must conduct themselves in accordance with the BBA Aviation Code of Business Ethics and seek to avoid even the appearance of improper behavior.

Looking for a copy of the BBA Aviation Code of Business Ethics or other ethical conduct policies?

Visit www.bbaaviation.com/about-us/corporate-social-responsibility.aspx
(Collectively, our Code and policies, the "Ethical Conduct Policies")

We expect each of our suppliers, contractors and consultants (collectively, "Suppliers") to conduct its business fairly, impartially and in an ethical and proper manner. In addition, we expect each of our Suppliers to adhere to the principles of our Ethical Conduct Policies concerning compliance with all applicable laws, conducting business fairly and ethically, respecting human rights, conserving the environment and providing high quality, safe products and services. Suppliers are expected to cascade these principles to their own suppliers. This may involve the establishment of supply chain management processes that integrate the requirements of this Code of Conduct.

BBA Aviation will assess its Suppliers' compliance with the foregoing commitment to our Ethical Conduct Policies and violations of this Code of Ethics may jeopardize a Supplier's relationship up to and including termination of the business relationship.

If any Supplier has cause to believe that any agent, employee of BBA Aviation has behaved improperly, unethically or otherwise violated the Ethical Conduct Policies, we expect the Supplier to report such behavior to the BBA Aviation Hotline or to a Senior Executive of BBA Aviation and/or Global Engine Services. BBA Aviation's Ethics Hotline toll free in the U.S. or Canada, 1-888-708-0803. For access from the UK first dial 0-800-89-0011, Germany 0-800-225-5288, Brazil 0-800-890-0288, South Africa 800-011-1111, Mexico 01-800-288-2872 and then dialing the US toll free number.

Message From

BBA Aviation Global Engine Services Supply Chain Leader

BBA Aviation and its group of companies has a proud tradition of service excellence in the Aerospace Industry. We and our suppliers have been entrusted to act ethically, legally, and morally. It is our policy that members of our Supply Chain will maintain the highest standards of conduct in all that we do. This not only means complying with the laws of the Countries that we operate in, but to morally and ethically do the right thing for our Companies and Customers. As a member of the BBA Aviation Supply Chain, you and your Company have a very important role in ensuring that our entire network of providers adhere to a standard that is not only expected by the business world but one that our Customers have come to rely on.

On that basis, we have adopted a Supplier Code of Ethics that will help guide us on a journey that keeps our Companies and Customers safe, responsible, reliable and professional in all respects. Our Customers are depending on us to deliver. As a member of our Supply Chain organization we expect that you uphold these standards and likewise require them from your suppliers and Supply Chain teams.

We are depending on you to do the right thing –
always...

Alton Johnson
Vice President, Global Supply Chain



Each Supplier Agrees:

Ethics; Improper Payments & Dealings with BBA Employees and Representatives

To uphold the highest standards of integrity in all business interactions; to transparently conduct and accurately reflect in its books and records its business dealings; to avoid engaging in any corruption, extortion, embezzlement or bribery (including promising, offering, giving or accepting); and to comply with all laws and regulations applicable to the conduct of its business, including all applicable anti-bribery and anti-corruption laws.

Working with Governments

To maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery of government officials; and to provide supporting data to BBA Aviation when requested.

Environment, Health & Safety

To comply with applicable environmental laws and regulations; to provide workers a safe and healthy workplace; to not adversely affect the local community; and to strive to reduce energy, waste and natural resource consumption by implementing conservation and substitution measures.

Trade Controls & Customs Matters

To comply with applicable export and import laws and regulations; and plan for and obtain all necessary authorizations and licenses to ensure timely and compliant delivery of their product.

Fair Employment Practices

To comply with applicable laws and regulations governing wages and hours; to allow workers to choose freely whether to organize or join associations for the purpose of collective bargaining as provided by local law; and to prohibit discrimination, harassment and retaliation;

Human Rights

To respect the human rights of your employees and others in your business operations and your activities for BBA Aviation; to never use or support practices that condone child labor; to not use forced, prison or indentured labor, or workers subject to any form of compulsion, coercion, deception or other abuse of power; to never engage in, support or condone trafficking in persons; and to adopt policies and establish systems to procure tantalum, tin,

tungsten, and gold from sources that have been verified as conflict free, and to provide supporting data on your supply chain for tantalum, tin, tungsten, and gold to BBA Aviation when requested.

Security & Privacy

To respect privacy rights of each individual; to safeguard BBA Aviation proprietary information; and to ensure compliance with laws and directives providing for the protection, transfer, access and storage of personal information.

Intellectual Property

To respect the intellectual and other property rights of BBA Aviation and third parties, including all patents, trademarks and copyrights.

Competition Law

To comply with competition (antitrust) laws in the countries where they operate or sell product or services; and to not co-ordinate market conduct with others in a way that improperly restricts competition.

Controllership

To ensure that all invoices and any customs or similar documentation submitted to BBA Aviation or governmental authorities or audited by third parties in connection with transactions involving BBA Aviation accurately describe the goods and services provided or delivered and the price thereof and ensure that all documents, communications and accounting are accurate and honest.

Conflict of Interest

To notify BBA Aviation of any actual or potential conflicts of interest as soon as they are known.

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All Suppliers are expected to self-monitor their compliance with this Code of Ethics and commit to maintaining a management system designed to ensure compliance with the principles set forth herein, all applicable laws and regulations, to identify and mitigate any operational risks, and to facilitate continuous improvement of the Supplier's business operations.