



RAVENNA, OHIO 44266-1211

Supplier Code of Conduct	
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Owners: Quality Director, VP of Operations	

Allen Aircraft Products Inc. Supplier Code of Conduct

This Code sets forth minimum requirements of any entity providing goods or services to Allen Aircraft Products Inc. AAP (hereinafter a "Supplier"). These requirements are consistent with AAP's values and are applicable to all Suppliers and their respective affiliates and sub tiers.

1. Compliance with Laws

Supplier shall at all times operate in full compliance with all applicable laws, rules and regulations (collectively "Laws").

2. Labor

Supplier shall uphold the human rights of workers and treat them with dignity and respect. Supplier shall only employ or engage workers who meet the applicable minimum legal age requirement, except that in no event shall Supplier employ any person under the age of 16, even if local Laws permit otherwise. Notwithstanding the foregoing, Supplier may allow individuals aged 15 or older to work as part of a bona fide apprentice program. Such apprentice program must be approved under local Laws and be intended to provide instruction in one or more particular industrial disciplines as part of enrollment in an educational institution.

Supplier shall not use or engage in any indentured or forced labor, slavery or servitude, human trafficking or compulsory labor.

Supplier shall set working hours, wages and over-time pay in compliance with all applicable Laws. Workers shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater.

Supplier shall employ workers on the basis of their ability to do the job and treat them with dignity and respect and shall not engage in or permit corporal punishment or threatened or actual violence.

Supplier shall not engage in any discrimination or harassment, whether based on gender, race, color, religion, ethnicity, social background, age, sexual orientation, national origin, disability, political conviction or any additional legally protected characteristics.



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Supplier shall respect employees' right to join or not join any lawful organization, including but not limited to trade unions and works councils, and shall comply with all applicable Laws pertaining to freedom of association and collective bargaining.

3. Health & Safety

AAP is committed to being a leader in safeguarding the health and safety of employees, officers, directors, agents and contractors ("Personnel").

Supplier shall comply with AAP's Safety Policy, and any site-specific safety requirement or protocol while on-site at AAP.

Supplier shall take responsibility for the health and safety of its Personnel. Ensure a safe work environment and minimize physical and chemical hazards through proper design, engineering and administrative controls, preventative maintenance and safe work procedures as well as ongoing safety training.

Provide workers with appropriate personal protective equipment where hazards cannot be adequately controlled by other means. Provide and properly maintain physical guards, interlocks, and barriers where machinery presents a potential injury hazard to workers. Minimize the impact of emergency situations through the implementation of emergency plans and response procedures. Provide training and ensure that its Personnel are appropriately trained and educated in respect of health and safety matters.

4. Environment

At AAP, environmental considerations are part of our business practices.

Supplier shall maintain all required environmental permits and registrations and follow the operational and reporting requirements of such permits.

Supplier shall comply with regulated substance and product content specifications and with any applicable laws prohibiting or restricting the use, content or handling of specific substances, including, but not limited to RoHS, WEEE, REACH, California Prop. 65 and other similar Laws. Supplier shall provide AAP any information relative to the foregoing, including, but not limited to, Material Declarations, as applicable.

Supplier shall minimize environmental pollution and make continuous improvements to reduce or eliminate solid waste, wastewater and air emissions by implementing appropriate conservation measures in their production, maintenance, and facility processes. Supplier shall manage, control, treat and/or dispose of non-hazardous solid waste, wastewater, and/or air emissions generated from operations as required by applicable Laws, before discharge.



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5. Ethics and Compliance

Supplier shall commit to the highest standards of ethical conduct when dealing with its Personnel, suppliers, customers and other relevant stakeholders.

Supplier shall accurately record and disclose information regarding its business activities, structure, financial situation, and performance in accordance with applicable Laws as well as prevailing industry business practices. Supplier shall prohibit any and all forms of fraud, extortion, theft or embezzlement by its Personnel.

Supplier shall respect intellectual property rights and safeguard AAP information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights. Supplier shall implement processes and procedures and exercise due diligence to detect and avoid counterfeit parts.

AAP is committed to ensuring that the products it sells do not incorporate “conflict minerals” (minerals which are smelted into tin, tantalum, tungsten and gold) sourced from entities which directly or indirectly finance conflict in the Democratic Republic of Congo or adjoining countries. Supplier shall perform sufficient due diligence into Supplier’s supply chains to determine whether products sold or provided to AAP contain tin, tantalum, tungsten or gold, and, if so, whether and to what extent those metals are sourced from conflict-free smelters; Report to AAP the results of such due diligence to enable AAP to comply with its legal obligations and policy goals; and commit to being or becoming “conflict-free”, so that any such metals are sourced only from conflict-free smelters. Supplier shall implement processes to address the confidentiality and protection of an employee who in good faith raises a concern, makes a report, or assists with an investigation related to potential ethical or criminal violations.

6. Anti-Corruption

AAP is committed to complying with all anti-corruption Laws that prohibit bribes, kickbacks, or other corrupt actions to obtain or retain business or obtain any improper advantage. **No Bribes or Kickbacks.** Supplier shall not directly or indirectly solicit, receive or offer any form of bribe, kickback, or other corrupt payment, to or from any person or organization, including but not limited to government agencies or officials, companies or Personnel of those companies. **Gifts and Entertainment.** When doing business with or conducting business on behalf of AAP, Supplier may, for legitimate business purposes offer gifts or entertainment to suppliers, customers or other business associates; or accept gifts or entertainment offered by suppliers, customers or other business associates; provided, however, that in each instance the gift or entertainment:

- a. is unsolicited;
- b. is not illegal or in violation of this Code;
- c. is not a bribe, kickback or other illicit payment;
- d. is not given in exchange for any consideration;



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- e. would not embarrass AAP if disclosed publicly; and does not create the appearance (or an actual or implied obligation) that the gift giver is entitled to preferential treatment, an award of business, better prices or improved terms of sale.

7. Compliance Monitoring

Supplier shall allow AAP and/or any of its representatives or agents access to Supplier's facilities and all relevant records associated with the products and services provided to AAP. Supplier and AAP shall establish a mutually agreeable date and time for access. However, risks to AAP's business may require immediate access to the products, services and associated records and Supplier shall accommodate AAP's reasonable access as required. Supplier also agrees to cooperate with AAP to investigate any allegations of wrongdoing, misconduct or corruption.

8. Application

Supplier shall contractually require its suppliers and/or subcontractors to conform to standards of conduct equivalent to the provisions of this Code. AAP reserves the right to audit Supplier's suppliers and/or subcontractors for compliance to this Code and Supplier shall accommodate AAP's audit as required. Supplier shall also ensure that its Personnel shall comply with this Code when providing goods or services to AAP.

9. Breach

Supplier shall promptly report to AAP notice of known breach of this Code and implement a corrective action plan to fix all non-compliance within a specified time period (furnished to AAP in writing). AAP reserves the right to terminate the business relationship, including but not limited to suspending placement of future orders and potentially terminating current production. AAP reserves the right to hold Supplier responsible for reasonable costs of investigating non-compliance.

Reviewed and approved:

Maud A. Ault
Director of Quality

Deborah Mann
Vice President of Operations

8/25/17
Date

8.25.17
Date