


Meggitt PLC and all subsidiary companies will conduct business fairly, impartially, and in full compliance with all applicable laws and regulations. We are firmly committed to integrity, honesty and respect for others in all our business relationships, including those with customers, suppliers, communities where we conduct business, and amongst employees. The highest standard of ethical behaviour is expected from Meggitt employees, directors, and from those who act on Meggitt's behalf in the performance of their professional responsibilities and in their own personal conduct.

Meggitt's Code of Conduct promotes "doing the right thing" and "doing things right" so that we maintain our personal and business integrity. No Code of Conduct can address every possible situation. Where a specific action is not mentioned or you are not sure what action to take, you should always seek guidance. The Code will help you identify the right resources and the people who can help you.

Employees, directors, and those who act on behalf of Meggitt, in accordance with Meggitt's related policies and procedures, should:

- Read and regularly review this Code of Conduct;
- Participate in training to learn about business ethics, compliance, laws and regulations that affect our business;
- Be alert to any Code violations, illegal or unethical conduct and promptly report them to management or other appropriate officials. If you believe that our Code of Conduct or related policies are being violated, you have a responsibility to speak up;
- Raise questions or concerns about the business and follow them through to appropriate conclusion according to Meggitt's Escalation Policy, which is available to all employees from your site Human Resources organization or your on-site Ethics Coordinator;
- Comply with all applicable laws and regulations;
- Deal fairly and impartially in all transactions;
- Not participate in activities that may raise questions as to Meggitt's integrity, impartiality, and reputation;
- Not engage in conduct that might create a conflict of interest for Meggitt or for themselves individually;
- Safeguard all Meggitt and customer assets and use them only for approved activities. In furtherance of this protection, no one shall seek personal gain through the inappropriate use of Meggitt's intellectual



property and confidential information or the intellectual property or confidential information of any third party which has been entrusted into Meggitt's care;

- No one shall buy or sell Meggitt's shares:
  - i. whilst in possession of price sensitive information or
  - ii. during a Closed Period for such transactions as advised by Meggitt's management from time to time.
- Be familiar with and refer to the other ethics and business conduct policies, including our Anti-corruption Policy, which are available on Meggitt's public web site: [www.meggitt.com](http://www.meggitt.com)

Meggitt's Anti-corruption Policy covers the following issues:

- Bribery
- Gifts and Entertainment
- Conflicts of Interest
- Competition and anti-trust
- Money laundering
- Sales representatives
- Distributors
- Political contributions and lobbying activities

Meggitt has implemented an Ethics and Business Conduct Programme across the Group in order to:

- Inform employees of Meggitt's policies and procedures regarding ethical business conduct;
- Provide regular training in ethics and business conduct;
- Create an environment where employees feel confident that they may raise questions or concerns and report suspected violations without fear of punishment or retaliation for doing so or for participating in an investigation;
- Sponsor an independently operated and monitored Ethics Line to enable employees to report questions or concerns about possible misconduct or to seek guidance about the proper course of action. The free telephone numbers are provided at the end of this Code and on message boards throughout our businesses. A web based application of the Ethics Line is also available for these purposes at: [www.expolink.co.uk/meggitt](http://www.expolink.co.uk/meggitt) Log on information is provided on message boards throughout our businesses.

- Provide a safe and productive work environment in which we promote employee's health and well-being and protect others from the consequences of alcohol, drug and substance misuse;
- Monitor compliance with this Code.

Meggitt will rigorously enforce compliance with this Code. Violations may subject employees to disciplinary action, including, in serious cases, the termination of employment. However, the statutory employment rights of employees will always be honoured.

If you have any questions or concerns about any aspect of this Code of Conduct or the way in which we are conducting business or treating people, you should address them to your line manager or your local business unit leader . You may contact Human Resources at any time or your on-site Ethics Coordinator. If you do not consider these options appropriate you may contact any of the following:

|                  |   |                                  |
|------------------|---|----------------------------------|
| Barney Rosenberg | - Vice President, Ethics and Business Conduct<br>Meggitt Group                    | Tel: 805 526<br>5700<br>Ext 6654 |
| Eric Lardiere    | - Senior Vice President,<br>Secretary and General<br>Counsel, Meggitt-USA,<br>Inc | Tel: 805 526<br>5700 Ext 6650    |
| Kate Coulson     | - Senior Legal Counsel<br>Meggitt PLC   | Tel: +44 (0)<br>2476 668 973     |
| Philip Green     | - Executive Director,<br>Commercial and<br>Corporate Affairs,<br>Meggitt PLC      | Tel: +44<br>(0)1202 597<br>569   |

The Ethics Line numbers are:

|            |                |
|------------|----------------|
| Australia: | 1 800 121 889  |
| Belgium:   | 0800 71025     |
| Brazil:    | 0800 891 8807  |
| Canada:    | 1888 268 5816  |
| China:     | 10800 441 0078 |
| Denmark:   | 8088 4368      |



|              |                  |
|--------------|------------------|
| France:      | 0800 900 240     |
| Germany:     | 0800 182 3246    |
| India:       | 000 800 440 1286 |
| Mexico:      | 01800 123 0193   |
| Netherlands: | 0800 022 9026    |
| Singapore:   | 800 4411 140     |
| Spain:       | 900 944 401      |
| Switzerland: | 0800 563 823     |
| UK:          | 0800 374 199     |
| USA:         | 1877 533 5310    |
| Vietnam:     | 0613 836 622     |

*Originally approved by the Board on 12 May 2005; updated on 28 July 2016.*