

Meggitt PLC and all subsidiary companies will conduct business fairly, impartially, and in full compliance with all applicable laws and regulations, and guided by:


- the Common Industry Standards adopted by the Aerospace and Defence Industries Association of Europe (ASD); and
- the Global Principles adopted by the International Forum on Business Ethical Conduct (IFBEC).

Meggitt is firmly committed to integrity, honesty, and respect for others in all its business relationships; including those with customers, suppliers, communities where we conduct business, and amongst its employees. The highest standard of ethical behaviour is expected from Meggitt employees, directors and from those who act on the Company's behalf in the performance of their professional responsibilities and in their own personal conduct.

A Code of Conduct has been adopted by the Board along with related policies to guide the conduct of our businesses; the people who work at Meggitt; and others with whom we work. These policies and procedures include Meggitt's Anti-corruption Policy; Corporate Responsibility Policy; and Standards of Business Conduct for US Government Contracting.

The company has implemented an Ethics and Business Conduct Programme across the Group which includes:

1. Training and awareness presentations;
2. The names and contact information for people who can help employees;
3. An independently operated Ethics Line for raising questions or concerns;
4. Other policies and procedures to be adopted from time to time to assist in the implementation of this policy;
5. Regular monitoring of the Ethics and Business Conduct Programme and of compliance with the Code of Conduct;



This policy, our Code of Conduct and related policies will be provided to all employees and directors. They will also be publicly available on Meggitt's web site: [www.meggitt.com](http://www.meggitt.com)

The Board delegates responsibility for oversight of the Ethics and Business Conduct Policy to the Ethics and Trade Compliance Committee. The Chief Executive and Executive Director, Commercial and Corporate Affairs will have executive responsibility and will report at least twice a year on these matters to the Ethics and Trade Compliance Committee and at least once a year to the full Board.

Strategic Business Unit Presidents and business unit leaders are responsible for local implementation of this policy.

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