

# CHROMALLOY

## SUPPLIER CODE OF BUSINESS CONDUCT

### OUR COMMITMENT TO CORPORATE RESPONSIBILITY

At Chromalloy, we are committed to certain essential core values and our **One Chromalloy** culture: **Integrity** is our firm adherence to moral and ethical principles, and the foundational element of trust and discipline. We deliver best-in-class **Quality** and consistently offer fresh ideas to better serve our customers. **Innovation** influences every product and service we offer, enabling us to serve customers in a way that no other company can. **Customer Focus** forms the foundation for every decision and strategy we implement – to ensure customers are at the center of all of our actions, activities and decisions. **Teamwork** enables us to achieve more by working together toward a common goal. These core values ensure that we operate with the utmost integrity, as we deliver high quality products and services to our valued customers in compliance with applicable laws, directives, regulations and industry standards. It is what our business partners and stakeholders expect. We are committed to meeting and exceeding such expectations and, in turn, expect that our suppliers and their affiliates, subsidiaries and operating divisions, and their respective management, employees, representatives, agents, sub-contractors and other procurement sources (collectively, “suppliers”) will practice and uphold the same values. This Supplier Code of Business Conduct not only expresses the expectations we have for our suppliers, but also mirrors the ethical business standards we expect Chromalloy and its affiliates, subsidiaries and operating divisions, and their respective management, employees, representatives and agents to meet.

### OUR COMMITMENT TO HUMAN RIGHTS

- A. **Child Labor.** We expect our suppliers to exercise diligence in ensuring that they do not use child labor in the performance of any of their work requirements. We do not, and we expect that our suppliers will not, employ children less than 15 years of age or who are younger than the age for compulsory education in their country, whichever is older.
- B. **Forced Labor.** We expect our suppliers to not engage in the use of forced labor, slavery or trafficking of persons.

### OUR COMMITMENT TO A POSITIVE WORK ENVIRONMENT

- A. **Harassment-Free Workplace.** We expect our suppliers to ensure that their employees are afforded a work environment that is free from psychological, sexual, physical and verbal harassment.
- B. **Diversity and Inclusion.** We expect our suppliers to provide equal employment opportunities to their employees without regard to age, color, ethnicity, gender identity, marital status, mental or physical disability, national origin, race, religion, sex or sexual orientation, so long as the essential functions of a job may be performed with or without reasonable accommodation. We expect our suppliers to treat people with dignity, encourage diversity and foster an inclusive culture and work environment.
- C. **Safety and Health.** We expect our suppliers to comply with applicable safety, occupational and health laws, directives, regulations, policies and procedures. Suppliers are expected to ensure the safety, health and welfare of their employees and others who may be impacted by their operations.
- D. **Working Hours.** We expect our suppliers to comply with applicable laws regulating maximum working time in the country or countries in which they operate.
- E. **Benefits.** We expect our suppliers to pay workers at least the minimum wages required by local law and provide all legally-mandated benefits. Workers must also be paid for overtime at such rates as may be legally required or, in those countries where such laws do not exist, at least equal to their regular hourly compensation rate.
- F. **Drug-Free Workplace.** We expect our suppliers to maintain a workplace free from alcohol, illegal drugs or misused medications, whether prescription or non-prescription.

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- G. **Freedom of Association.** Our suppliers shall respect the rights of all workers and comply with applicable laws, directives and regulations on collective representation and bargaining. Additionally, workers and their representatives shall be permitted to openly communicate with management regarding working conditions, without fear of discrimination, reprisal, intimidation or harassment.

## OUR COMMITMENT TO INTEGRITY AND COMPLIANCE

- A. **Anti-Corruption Laws.** We expect our suppliers to comply with the anti-corruption laws, directives, regulations, policies and procedures applicable to their operations, including the U.K. Bribery Act and the U.S. Foreign Corrupt Practices Act. Suppliers shall refrain from offering or making any improper payments of money, cash equivalents or anything of value, directly or indirectly, to government officials, political parties, candidates for public office, royal family members or other persons, with the intention of exerting undue influence, improper advantage or otherwise, to assist Chromalloy or supplier in obtaining or retaining business. The payment of any form of facilitating or facilitation payment intended to expedite the administration of routine government actions and services is prohibited. Such payments are permitted, however, where there is an imminent threat to the life, liberty or safety of a supplier's employee. Suppliers are expected to exercise reasonable due diligence to prevent and detect corruption in their business associations, including joint ventures, investments and the engagement of intermediaries such as agents.
- B. **Books and Records.** We expect suppliers to create and maintain accurate books and records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented.
- C. **Gifts and Business Courtesies.** We compete on the merits of our products and services and do not employ the use of gifts, hospitality or business courtesies to secure unfair competitive advantages. We expect the same of our suppliers in the offering or receipt of any gifts, hospitality or business courtesies. Our suppliers must ensure that the offering or receipt of any gifts, hospitality or business courtesies is permitted by applicable law, is consistent with the local customs of the countries in which suppliers operate, is not prohibited by the policies of the recipient's organization and will not cause reputational damage to Chromalloy.
- D. **Counterfeit Parts.** We expect our suppliers to plan, implement and control processes for the prevention of counterfeit or suspect counterfeit part use and their inclusion in products delivered to Chromalloy, in compliance with, without limitation, AS9100 (clause 8.1.4). Effective mechanisms should be developed, implemented and continually enhanced by suppliers to: train supplier in the awareness and prevention of counterfeit parts; apply a parts obsolescence monitoring program; acquire externally-provided products from original or authorized manufacturers, authorized distributors or other approved sources; assure traceability of parts and components to their original or authorized manufacturers; verify and test methodologies to detect counterfeit parts; monitor counterfeit parts reporting from external sources; and, quarantine and report suspect or detected counterfeit parts.
- E. **Quality.** We expect our suppliers to exercise the care necessary to ensure that their products and services comply with applicable quality standards. Suppliers shall put in place quality assurance controls to promptly identify defects, prevent the falsification of inspection data, implement corrective actions, report any control lapses and facilitate the delivery of products and services whose quality meet or exceed contractual obligations to Chromalloy.
- F. **Competitive Behavior.** We expect our suppliers to compete fairly in the marketplace and to conduct their businesses in accordance with applicable competition and antitrust laws, directives, regulations, policies and procedures. This includes obviating business practices that involve bid rigging, market allocation, exchanging pricing information, price fixing and unlawfully restraining competition.
- G. **Insider Trading.** We expect our suppliers to not use any material or non-publicly-disclosed information obtained in the course of doing business with Chromalloy as a basis for trading or enabling others to trade in the securities of any organization.

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- H. **Conflicts of Interest.** We expect our suppliers and the immediate family members of any supplier to avoid any conflicts of interest, as well as the appearance of any potential conflicts of interest, including, such as, without limitation: having a private or outside employment, investment, consulting or other business relationship with Chromalloy; providing excessive, inappropriate and ill-timed gifts, entertainment or travel to Chromalloy; having a romantic relationship or any form of malapropos relationship with Chromalloy which would interfere with a supplier's performance or improperly influence the duties or decision-making responsibilities of Chromalloy or any immediate family member thereof.
- I. **Compliance with Laws.** Our suppliers must perform all commitments to Chromalloy in compliance with applicable laws, directives, regulations and industry-standard requirements, wherever they may conduct business. Additionally, suppliers must comply with all terms, conditions and other requirements specified in any Chromalloy purchase order.

## OUR COMMITMENT TO TRADE COMPLIANCE AND RESPONSIBLE SOURCING

- A. **Imports.** Our suppliers are expected to comply with applicable laws, directives, regulations, policies and procedures governing the import of domestic and foreign origin components, parts and related technical information.
- B. **Exports.** Our suppliers are expected to comply with applicable laws, directives, regulations, policies and procedures governing the export of domestic and foreign origin components, parts and related technical information. Suppliers must provide accurate information when applying for and maintaining export licenses and other requisite trade control authorizations.
- C. **Conflict Minerals.** We expect our suppliers to take appropriate steps to detect whether their products contain cassiterite, columbite-tantalite, gold and wolframite, as well as their derivatives and other minerals, including, without limitation, tin, tantalum, tungsten and gold, and implement supply chain controls to determine the sources of such minerals, which may finance or benefit armed groups in the Democratic Republic of Congo or the countries adjoining thereto.

## OUR COMMITMENT TO INFORMATION MANAGEMENT

- A. **Information Controls and Use.** Our suppliers are expected to implement appropriate measures to handle the confidential, proprietary and personal information of suppliers, customers, consumers and employees. Information must not be utilized for any purpose other than the purpose for which it was provided.
- B. **Intellectual Property.** We expect our suppliers to respect intellectual property rights, and transfers of technology and know-how are to be done in a manner that safeguards applicable intellectual property rights.
- C. **Information Security; Data Privacy and Protection.** Suppliers are expected to protect confidential and proprietary information from unauthorized access, use, disclosure and destruction, through appropriate cybersecurity and other information security procedures. We expect suppliers to comply with applicable data privacy and protection laws, directives and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.

## OUR COMMITMENT TO THE ENVIRONMENT

- A. **Conservation.** We expect our suppliers to operate in a manner that appropriately manages environmental risks, conserves natural resources and protects the environment.
- B. **Environmental Management System.** We expect our suppliers to implement reasonable environmental management controls that mitigate risks and hazards associated with the environment, including from regulatory non-compliance and reputational loss.

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- C. **Compliance.** Our suppliers shall obtain and maintain current all required environmental permits and registrations. Chemicals and other materials posing a hazard if released into the environment are to be managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

## **OUR COMMITMENT TO ENSURING OUR SUPPLIERS' ETHICS AND COMPLIANCE**

- A. **Ethics Policies.** Our suppliers are expected to establish internal controls to achieve compliance with applicable laws, directives and regulations, as well as meet the expectations expressed in this Supplier Code of Business Conduct. We expect our suppliers to maintain effective compliance programs that teach their employees and suppliers to make ethical and values-driven choices in their business conduct.
- B. **Supplier Requirements.** Our suppliers must understand that we frequently have customer-directed and legally-mandated supplier requirements that may necessitate use of in-country procurement sources both by us and our suppliers. These may additionally be defined as, without limitation, small businesses, minority-owned businesses, women-owned businesses, among others.
- C. **Reporting.** Our suppliers are expected to provide their employees and suppliers with appropriate channels to raise legal, ethical and other issues or concerns without fear of reprisal.
- D. **Consequences for Violating Our Supplier Code of Business Conduct.** In the event that the expectations of this Supplier Code of Business Conduct are not met, the business relationship with Chromalloy may be reviewed and corrective action pursued, subject to the terms of any related procurement contract.
- E. **Acceptance of this Supplier Code of Business Conduct.** Supplier acknowledges and agrees that any goods or services it or its suppliers provides to Chromalloy will be provided in accordance with this Supplier Code of Business Conduct. Supplier further agrees to perform any purchase order or other agreement entered into with Chromalloy consistently with these principles and Chromalloy's Terms and Conditions of Purchase, and to flow-down the **One Chromalloy** values and principles set forth herein in its business conduct with its suppliers.