



BUSINESS PARTNER CODE OF CONDUCT

Panasonic Avionics Corporation, including its subsidiaries and joint ventures (“Panasonic Avionics” or “the Company”), is committed to operating with the highest ethical standards and integrity. This Business Partner Code of Conduct (“Business Partner Code”) contains the standards and principles the Company expects its Business Partners to follow in providing products and services to or on behalf of Panasonic Avionics.

The Business Partner Code is meant to supplement and not supersede Business Partner contracts. In the case of a conflict, the contract terms will prevail unless otherwise stated in the contract. However, failure to comply with the provisions of this Business Partner Code, depending on the seriousness, could lead to terminating a Business Partner contract.



Compliance with Applicable Laws

Business Partners must comply with all applicable laws and regulations of the countries where they operate and the countries where they provide services to or on behalf of Panasonic Avionics.

Anti-Corruption

Panasonic Avionics expressly prohibits all forms of bribery and corruption. Business Partners must comply with all applicable anti-corruption laws and must not offer, promise, authorize or make improper payments of money or anything of value, directly or indirectly, to government officials, political parties, candidates for public office, or any other persons. The Company also expressly prohibits facilitating payments (payments made to expedite or secure performance of a routine government action) but allows for safety payments when there is an imminent threat to health and safety.

Anti-Corruption Training

Panasonic Avionics may, at its discretion, require a Business Partner's employees to take anti-corruption training as part of its obligations under this Business Partner Code. This training will be limited to those employees providing services to, or on behalf of, Panasonic Avionics.

Gifts and Hospitality

Business Partners are expected to compete on the merit of their products and services and may not use the exchange of gifts, meals, entertainment, or other business courtesies to gain an unfair advantage. Business Partners must ensure that the offer or receipt of any business courtesy is related to business, permitted by local law, does not violate the recipient organization's policies, is modest in value, is customary under the circumstances, and does not give an appearance of impropriety or negatively impact the reputation of Panasonic Avionics. Gifts of cash or cash equivalents, such as gift cards, are never permissible.



Anti-Trust and Competition

Business Partners are expected to operate in compliance with all applicable anti-trust and competition laws and regulations and must not engage in price fixing, price discrimination or any other unfair trade practices that unlawfully restrain competition.

Conflicts of Interest

Business Partners are expected to operate transparently and with the highest standards of ethics and integrity. A conflict of interest arises when an individual's personal interests or activities influence, or appear to influence, their ability to act in the best interests of Panasonic Avionics. Business Partners are required to immediately disclose any actual or potential conflict of interest to Panasonic Avionics, including if a Company employee has any type of interest in the Business Partner, prior to beginning services or whenever they arise throughout the relationship.



Confidential Information

Business Partners must properly handle all confidential, proprietary, personal, and any other sensitive information. This information should be properly safeguarded and must not be disclosed or used for any other purpose outside the contract scope, without obtaining prior written approval from Panasonic Avionics.

Human Rights

Panasonic Avionics is committed to upholding the human rights of all people. The Company expects our Business Partners to make the same commitment to treat people with respect and dignity, encourage diversity and diverse opinions, promote equal opportunity, and to foster an inclusive and ethical work environment.

Non-Discrimination / Harassment

Business Partners are required to comply with all applicable laws concerning discrimination, retaliation or attempted retaliation in their hiring and employment practices. Business Partners are also expected to provide employees with a work environment free from physical, verbal, sexual or psychological harassment, bullying, intimidation, or other abusive conduct.

Human Trafficking / Forced Labor

Business Partners must comply with applicable local laws and regulations prohibiting human trafficking in the country or countries where they operate. Business Partners will not engage in the use of forced labor of any type, including bonded, indentured or involuntary prison labor, slavery or human trafficking.

Child Labor

Business Partner must not use child labor. The term “child” refers to any person under the minimum legal age requirement for employment in the country or countries where the work is performed.

Alcohol and Drugs

Business Partners are expected to maintain a workplace free of illicit substances and are prohibited from providing any work for or on behalf of Panasonic Avionics while under the influence of alcohol, illegal drugs or controlled substances.

Working Hours and Wages

Business Partners are expected to maintain reasonable working hours and to compensate their workers in compliance with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

Freedom of Association and Collective Bargaining

Business Partners should respect and recognize the right of employees to join and form organizations of their own choosing, including trade unions, and to bargain collectively without fear of reprisal, intimidation or harassment.



Health and Safety

Business Partners are expected to provide employees with a safe and healthy working environment that complies with all applicable health and safety laws, codes, and regulations.

Environment

Panasonic Avionics considers environmental responsibility an integral part of delivering world class service. Similarly, the Company expects our Business Partners to conduct their operations in an environmentally responsible manner that ensures compliance with all applicable environmental laws and regulations, minimizes environmental pollution, promotes the efficient use of natural resources, and protects the environment.



Use of Subcontractors / Subagents

Business Partners must disclose the names of all subcontractors and subagents engaged to perform services for or on behalf of Panasonic Avionics. In addition, Business Partners are expected to take the steps necessary to ensure the principles of this Business Partner Code are communicated, understood and adhered to by those subcontractors or subagents.

Conflict Minerals

Business Partners are expected to comply with applicable laws and regulations regarding conflict minerals, which include tin, tungsten, tantalum and gold. In addition, Business Partners must ensure that any material provided to Panasonic Avionics containing conflict minerals was sourced in a manner that did not directly or indirectly contribute to the financing of armed groups in the Democratic Republic of Congo (DRC) and neighboring countries.

Reporting Concerns

Business Partners are expected to provide the avenues for employees to report concerns or illegal activity in the workplace without fear of any reprisal. Business Partners are also expected to investigate these reports and to take any necessary actions to remediate these concerns.

Business Partners or their employees may also anonymously report concerns to the Panasonic Ethics & Compliance Hotline (877-PANA-TIP / 877-7262-847, or www.panasonic hotline.com).

Business Partners and their employees may also raise concerns or ask questions about this Business Partner Code to the PACOfficeofComplianceandEthics@Panasonic.aero.

Panasonic

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