

# TEXTRON

## CODE OF CONDUCT FOR SUPPLIERS AND OTHER BUSINESS PARTNERS

*Approved by E. Robert Lupone, EVP, General Counsel, Secretary and Chief Compliance Officer*

**Textron (including its business units, divisions and subsidiaries, collectively, “Textron”) is committed to being a responsible corporate citizen and upholding the highest standards of ethics and business conduct throughout its global operations. Accordingly, Textron expects its suppliers and other business partners to conduct business consistent with these standards and in full compliance with applicable laws and regulations.**

This Textron Code of Conduct for Suppliers and Other Business Partners (the “Supplier Code”) sets forth Textron’s expectations for ethics and compliance within its global supply chain. The Supplier Code applies to any third party that directly or indirectly sells, or seeks to sell, any kind of goods or services to Textron or on Textron’s behalf. As such, the Supplier Code applies to suppliers, subcontractors, distributors, dealers, sales and service representatives, consultants, intermediaries and agents (collectively, “suppliers”). Textron expects all of its suppliers to adhere to the principles of the Supplier Code and to ensure that their directors, officers, employees, representatives, agents and business partners, as well as the suppliers within their supply chain, also adhere to the principles established by this Supplier Code. Upon request, suppliers will provide Textron with the information reasonably required to enable Textron to confirm their compliance and the compliance of their sub-tier suppliers, with this Supplier Code.



### **RELATIONSHIP TO CONTRACTUAL TERMS**

This Supplier Code shall in no way conflict with or modify the provisions of any existing contract. Unless otherwise agreed in such a contract, suppliers shall comply with the provisions of the contract in the event of a conflict with this Supplier Code.

### **FAIR EMPLOYMENT PRACTICES**

Suppliers must establish and maintain fair employment practices, including providing equal opportunity in employment regardless of race, color, religion, national and ethnic origin, sex (including pregnancy), sexual orientation, age, marital status, handicap, disability, genetic information, status as a veteran, military service or obligation and other characteristics protected by law.

Textron also expects suppliers to ensure that their employees are afforded an employment environment that is free from physical, psychological, sexual and verbal harassment, intimidation or other abusive conduct.

### **COMPLIANCE WITH LAWS**

At a minimum, suppliers must maintain full compliance with all laws and regulations applicable to the operation of the supplier’s business and laws and regulations that govern the supplier’s relationship with Textron, including the local laws and regulations outside their home country in which operations are located or services are being provided.

### **FORCED LABOR, CHILD LABOR AND HUMAN TRAFFICKING**

Suppliers must not engage in the use of illegal child labor or obtaining labor or services through coercion, physical threats or restraints, withholding of passports, identity or immigration documents, the use of false or misleading recruitment practices, or other forced labor practices or human trafficking activities.

All supplier employees must be free to terminate their employment after reasonable notice and to receive all owed compensation.



## **ANTI-CORRUPTION LAWS**

Textron has a zero-tolerance policy for corruption, and its suppliers must comply with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and other applicable anti-corruption laws and regulations that govern operations in the countries in which they do business, regardless of local customs. We expect our suppliers to use due diligence to prevent and detect corruption in all business arrangements. Suppliers therefore must:

- never offer, pay or accept bribes, kickbacks or other improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons to obtain an undue or improper advantage, including facilitation payments to speed up the performance of a function or activity to which the supplier is legally entitled (for example, the release of goods held in customs at a port or the issuance of permits or licenses); this prohibition applies even in locations where such activity may not violate local law or custom;
- only provide or accept favors, gifts, gratuities, meals, entertainment, travel or other business courtesies (collectively “hospitality”) to the extent legally permitted by the laws, regulations and policies that govern the conduct of the recipient and consistent with reasonable marketplace customs and practices and never lavish or inappropriate;
- never give or accept gifts of cash (or cash equivalents such as prepaid credit or debit cards);
- not engage in anti-competitive behavior such as price-fixing, bid-rigging and other forms of illegal collusion; and
- not engage in other deceptive or unfair market practices, whether on Textron’s behalf, the supplier’s behalf or on behalf of others, and never make misrepresentations regarding Textron’s products or services, the supplier’s products or services, or the products or services of others.

## **EMPLOYEE HEALTH AND SAFETY**

Suppliers must protect the health, safety and welfare of those who may be affected by their activities by complying with all applicable environmental and health and safety laws, regulations and directives. Suppliers must maintain a safe and healthful workplace for their employees free of illegal drugs or controlled substances. Further, we expect our suppliers to dutifully report any workplace injuries and/or death to federal and/or state agencies as required by the Occupational Safety and Health Act or state equivalent regulation.

## **FREEDOM OF ASSOCIATION**

Textron expects suppliers to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. Textron expects suppliers to recognize and respect the right of workers to exercise lawful rights of free association, including joining or not joining any Works Council, union or worker’s association of their choosing.

## **WORKING HOURS, WAGES AND BENEFITS**

Suppliers must ensure compliance with all applicable laws related to working hours and overtime requirements. Suppliers must pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits.

## **EMPLOYEE COMPLIANCE**

Suppliers must make their employees aware of the expectations of this Supplier Code and provide their employees with avenues for raising legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting.

## **SUBCONTRACTOR COMPLIANCE**

Suppliers agree that any workers supplied by subcontractors to work at the supplier’s facilities will be treated in a manner consistent with the principles set forth in this Supplier Code.





### HUMAN RIGHTS

All Suppliers are expected to share in, and abide by, Textron's commitment to human rights set forth in the [Textron Human Rights Commitment](#).

### CONFLICTS OF INTEREST

Suppliers must avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Textron. Conflicts of interest can arise when personal or financial interests interfere or appear to interfere with a person's ability to make objective business decisions or perform their duties without bias. This applies to a conflict between the interests of our company and the personal interests of those working on our behalf, or their close relatives, friends, or associates. Suppliers must provide immediate notification to all affected parties in the event that an actual or potential conflict of interest arises.

### COUNTERFEIT PARTS

Textron expect its suppliers to supply products that are not and do not contain counterfeit parts. Suppliers must have effective methods and processes in place to minimize the risk of introducing counterfeit parts and materials into deliverable products and to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered products.

### PUBLICITY

Suppliers must obtain Textron's written approval before using Textron's name or logo in any advertising, marketing materials or other publicity.

### NON-PUBLIC INFORMATION AND INSIDER TRADING

Suppliers must not use material, non-publicly disclosed information obtained in the course of their business relationships with Textron as a basis for trading or enabling others to trade in securities.

### CYBERSECURITY

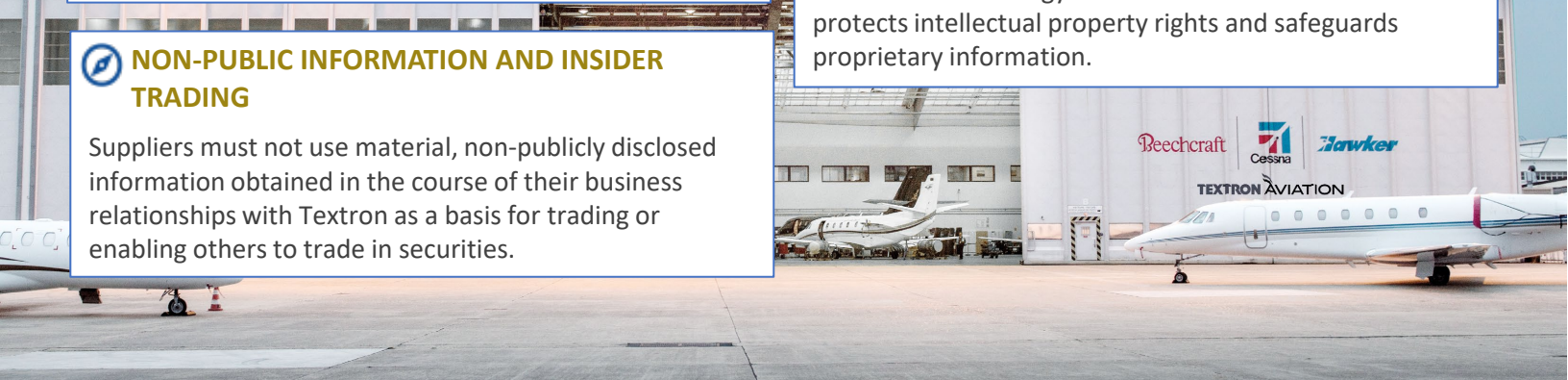
Suppliers must safeguard and protect Textron's Information as well as any information that they generate or develop in support of Textron's products, programs or services from unauthorized access, destruction, use, modification or disclosure. Suppliers must have risk-based cybersecurity programs designed to mitigate threats to their information systems, products, services and supply chain and to comply with all applicable contractual and legal requirements.

### MAINTAIN ACCURATE RECORDS

Suppliers must maintain accurate and complete business records and must 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. Records must be retained for the duration of the suppliers' relationship with Textron and for such additional periods as may be required by law, contract or policy.

### CONFIDENTIAL AND PROPRIETARY INFORMATION; INTELLECTUAL PROPERTY

Suppliers must safeguard and protect proprietary and confidential information received by them from Textron ("Textron's Information") and physical property or personal data of Textron and its employees, other Textron suppliers and Textron customers which is in their care or possession and use any such information only for the business purpose for which it was provided. Suppliers must respect intellectual property rights and conduct any transfer of technology and know-how in a manner that protects intellectual property rights and safeguards proprietary information.



## ENVIRONMENT

Suppliers must comply with all applicable environmental laws and regulations and conduct their business in a manner that actively manages environmental risks across their operations, products and supply chain. Textron expects suppliers to apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities for improvement associated with the environment. To help combat the impacts of climate change, Textron expects suppliers to improve the efficiency of their energy, water and natural resource usage and to responsibly manage their air emissions. Furthermore, Textron expects suppliers to minimize the use of hazardous materials in products and hazardous waste generation in operations and to limit the use of packaging materials where feasible or to foster reusable/recycled packaging materials. Over time, Textron expects suppliers to establish environmental sustainability priorities and report their progress, including providing data necessary for Textron and its customers to meet their compliance and reporting obligations.

## RESPONSIBLE SOURCING OF MINERALS

Suppliers shall have a due diligence process to reasonably assure that any material considered to be a “conflict mineral” (currently, tantalum, tin, tungsten and gold) in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available upon request.

## MONITORING SUPPLY CHAIN

Each of Textron’s businesses has a supply chain management process tailored to the specific supply chain needs of the business’s operations. This ensures that the processes, procedures and training of each business are designed to address the specific needs and risks presented by the business’s unique supply chain. Textron also has an enterprise-wide Procurement Council to share best practices and processes and foster collaboration and communication among businesses. Textron expects its suppliers to support Textron’s efforts to continuously monitor risks in its supply chain. Suppliers are therefore expected to promptly respond to information requests from Textron, including those related to environmental reporting, human rights, and supply chain traceability.

## SUPPLY CHAIN SECURITY

When applicable, suppliers are encouraged to implement practices and procedures to ensure the security of their supply chains in accordance with the Customs-Trade Partnership Against Terrorism initiative of the United States Department of Homeland Security.

## SUPPLY CHAIN MANAGEMENT AND REPORTING

Commensurate with the size and nature of their business, Textron expects its suppliers to have a supplier management system with appropriate due diligence processes in place to support compliance with applicable laws, regulations and the obligations set forth in this Supplier Code and make their due diligence measures available upon request. Textron encourages its suppliers to implement their own written code of conduct aligned with the principles of this Supplier Code and to flow down the principles of this code of conduct to the entities that furnish goods and services to the supplier.

## INTERNATIONAL TRADE COMPLIANCE

Textron expects its suppliers to conduct business in compliance with all applicable laws, directives and regulations governing the import, export, re-export and retransfer of parts, components, goods, technical data, software and services, including compliance with applicable economic sanctions and embargoes, restrictions imposed on dealings with certain entities or individuals, and the U.S. antiboycott requirements. Textron’s suppliers must not participate in, cooperate with, or further the cause of any unsanctioned foreign economic boycott, in accordance with the Export Control Reform Act of 2018 and the 1976 Tax Reform Act.

## SUPPLIER CODE COMPLIANCE

In the event that the expectations of this Supplier Code are not met, the business relationship may be reviewed and corrective action pursued subject to the terms of the related supply contract(s).

## RAISING CONCERNS

Textron encourages reporting of any circumstances that violate, or appear to violate, this Supplier Code. To report a suspected or known violation, contact Textron at 1-800-892-9871 (Toll free in U.S. and Canada) or 1-401-457-6006, or file an [online report here](#).

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[www.Textron.com](http://www.Textron.com)