

UNIVERSAL AVIONICS SYSTEMS CORPORATION

STATEMENT OF VALUES

Introduction

Universal Avionics Systems Corporation (“UA”) and our affiliated companies are committed to maintain high standards of corporate responsibility. UA strives to maintain a global reputation for conducting business with integrity, high ethical principles, and compliance with laws and regulations governing UA’s activities. To help UA maintain such high standards, UA has created this Statement of Values to confirm UA’s commitment and to have a readily accessible communication for our Customers, Suppliers, Employees and the public. Should you have any questions or need more specific information regarding the content of this Statement of Values, please contact UA at compliance@universalavionics.com or at www.universalavionics.com and choose the option for “Contact Us”. Your request will be routed to the appropriate party within UA.

Conduct and Business Ethics

UA has adopted an Code of Business Conduct and Ethics (“Ethics Code”) regarding business ethics and professional integrity. UA’s commitment to this Ethics Code is demonstrated in all UA’s business dealings and relationships, including employee’s personal behavior at all times. UA’s leadership is committed to acting accordingly with the Ethics Code. It is critical that every employee and individual who conducts business on behalf of UA understands the principles and is also committed to fully adhering to them. Even the appearance of any impropriety can negatively affect UA, and our success as a company depends on our organization maintaining our ethical values and honest conduct.

UA’s Ethics Code also address Anti-Bribery and Anti-Corruption; Human Rights, and Fair Labor Practices; Political Activity; Conflicts of Interest; Confidentiality; Social Media usage and Reporting of Illegal or Unethical Behavior.

The full text of UA’s Ethics Code can be located here: [UA Code of Business Conduct and Ethics](#)

The full text of UA’s Anti-Bribery and Corruption Compliance Policy can be located here: [UA Anti-Bribery and Corruption Compliance Policy](#)

Procurement Policies and Supplier Code of Conduct

UA expects its suppliers, vendors, and contractors to conform to UA’s Supplier Code of Conduct (“Supplier Code”) when providing goods and services to UA as well as when handling their employees, supply chain, and other third parties. UA recognizes that a supplier may operate in different legal and

cultural environments worldwide, and that adherence to the Supplier Code may take different forms. Suppliers are always encouraged to continuously improve not only in the actual provision of goods and services to UA, but also in their commitment to comply with the Supplier Code and their own operations.

Suppliers must respect internationally accepted human rights, and ensure that human rights abuses are not acceptable, either directly or implicitly by the Supplier. Minimum ages and payments must be adhered to, with no person under the age of eighteen (18) undertaking any hazardous work. Suppliers must also treat their employees with respect and dignity. Harassment, violence, abuse (whether physical or verbal) should not be tolerated. Discrimination against employees in hiring, promotion or salary should not be based on color, gender, religion, national or ethnic origin, age, physical ability, sexual orientation, political affiliation, union membership, parental or marital status should be tolerated. Everyone wins when the most qualified people work together to achieve the goals of an organization. Suppliers are expected to support diversity and equal opportunity in the workplace.

Suppliers are also required to provide a safe and health working environment for their workers. Accident prevention, emergency response plans, and proactive approaches to health and safety and minimizing health risk exposures are intangible qualities that UA seeks in all its Suppliers. Suppliers should also undertake initiatives to promote greater environmental responsibility and provide systems to reduce waste, conserve resources, and more efficiently provide goods and services to UA. Suppliers are also required to disclose measures taken to determine if the products they manufacture, or contract to manufacture, contain Conflict Minerals or materials involving Child Labor and/or Human Trafficking.

The full text of UA's Supplier Code can be located here: [UA Supplier Code of Conduct](#)

The full text of UA's Conflict Minerals Compliance Policy Statement can be located here: [Conflict Minerals Compliance Policy](#)

The full text of UA's Anti-Slavery, Human Trafficking, and Child Labor Declaration can be located here: [Anti-Slavery, Human Trafficking and Child Labor Declaration](#)