

Ethics and Conduct

Conducting our business ethically is one of Universal Avionics Systems Corporation's (the "Company or "UA") core values. UA's policy is to follow best practice compliance standards applicable to the broad range of our global activities. Because of the significance we place on the transparency of our ethical business conduct, the following codes, policies and procedures are all publicly available as provided below.

Code of Business Conduct and Ethics

Conducting UA's business ethically and consistent with best practices and legal requirements is essential to our success. Below is a link to UA's *Code of Business Conduct and Ethics*, as approved by the Company's Board of Directors.

[Code of Business Conduct and Ethics](#)

Whistleblower and Investigations Procedure

As part of UA's business ethics compliance policy, UA encourages reporting of suspected violations of its policies, improper conduct, and/or legal non-compliance. UA is committed to taking such reports seriously, investigating them in a prompt and discrete manner, and UA does not tolerate retaliation against employees who report in good faith. Below is a link to UA's *Whistleblower and Investigations Procedure*, which describes the methods for reporting and the process UA follows to investigate such reports.

[Whistleblower and Investigations Procedure](#)

Anti-Bribery and Corruption Compliance Policy

The international nature of UA's business and UA's work with governmental customers and end users around the world, as well as UA being part of a publicly traded company, requires us to follow leading anti-bribery and corruption compliance standards. UA has zero tolerance for corruption, and the employees, officers and directors are committed to conducting UA's business according to applicable anti-bribery and corruption compliance practices. Below is a link to UA's *Anti-Bribery and Corruption Compliance Policy*.

[Anti-Bribery and Corruption Compliance Policy](#)

Procedure on Anti-Bribery and Corruption Due Diligence

An important part of UA's anti-bribery and corruption compliance policy is the due diligence UA conducts with respect to third parties with whom we do business. Below is a link to UA's *Procedure on Anti-Bribery and Corruption Due Diligence* (without Annexes).

[*Procedure on Anti-Bribery and Corruption Due Diligence*](#)

Business Entertainment and Gifts Policy

Another important aspect of UA's anti-bribery and corruption compliance policy, as well as UA's policy for avoiding potential conflicts of interest, is the way in which UA provides and receives business entertainment, hospitality and gifts. Below is a link to UA's *Business Entertainment and Gifts Policy* (without Annexes).

[*Business Entertainment and Gifts Policy*](#)

Supplier Code of Conduct

UA expects its supply chain to meet UA's ethical standards in all of their activities with us. Below is a link to a copy of UA's *Supplier Code of Conduct*, which is incorporated into UA procurement agreements.

[*Supplier Code of Conduct*](#)

Conflict Minerals Compliance Policy

UA supports government and industry initiatives to increase supply chain transparency to facilitate the ability of companies to source "conflict-free minerals." UA is also committed to sourcing materials from companies that share UA's values with respect to conflict minerals, as reflected in UA's *Conflict Minerals Compliance Policy* (link below).

[*Conflict Minerals Compliance Policy*](#)

Human Rights Statement

UA conducts its business activities in accordance with best practices relating to the human rights of its workforce, supply chain, and surrounding communities. UA adheres to the UN Guiding Principles on Business and Human Rights. Below is a link to UA's latest *Human Rights Statement*, as approved by UA's Board of Directors.

[*Human Rights Statement*](#)