

Code of Ethics and Business Conduct Policy

Category: Employee Relations

Effective Date: 2/2/2023

Distribution: All SEKISUI Aerospace Employees

Policy Owner: Sr. Director of HR, Human Resources

Approved by: Linda Moseley

Purpose

SEKISUI Aerospace strives to maintain high ethical standards, ensure orderly operations, and provide a safe and secure work environment. SEKISUI Aerospace expects employees and others, such as temporary personnel, consultants, and independent contractors, to follow these rules of conduct while on company premises, attending company functions, or performing work-related activities. It is expected that people will conduct themselves and the company's business with integrity and comply with all applicable laws in a manner that excludes consideration of personal advantage or gain.

In addition to maintaining and enforcing this policy to protect the interests and safety of all employees and the organization, SEKISUI Aerospace complies with all applicable federal, state, and local laws and regulations concerning employer/employee rights and obligations.

Our Values

Safety First: Don't walk by.

Excellent: Be the best at what you do.

Dignity and Respect: Treat others as you want to be treated.

Integrity: Do what you say.

Trust: Lean on the team.

Engagement: With team members and customers.

Passion: Give your best!

Corporate Philosophy: 3S Principles

Service: At SEKISUI, we serve our stakeholders by creating social, environmental, and economic value through responsible business practices.

Speed: At SEKISUI, we accelerate innovation by eagerly taking on new challenges, adapting to change, and staying ahead of the times.

Superiority: At SEKISUI, we contribute to society by helping to solve social issues with our superior technologies and quality.

Codes of Conduct

Though it is not possible to list all forms of behavior that are unacceptable in the workplace, the following are examples of behavior that would be considered unacceptable. Such behavior may result in disciplinary action, up to and including termination of employment. This list is not intended to be exhaustive:

1. Theft or inappropriate removal or possession of company property or the property of a fellow employee.
2. Willful destruction of company property or the property of a fellow employee.
3. Working under the influence of alcohol or illegal drugs.
4. Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace, while on duty, or while operating employer-owned vehicles or equipment.
5. Fighting or threatening violence in the workplace.
6. Sexual or other harassment.
7. Using excessively abusive, threatening, or obscene language.
8. Using intimidation tactics and making threats.
9. Sabotaging another's work.
10. Making malicious, false, and harmful statements about others.
11. Publicly disclosing another's private information.
12. Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace.
13. Unauthorized disclosure of business "secrets" or confidential information.
14. Falsifying company records or reports, including one's time records or the time records of another employee.
15. Willfully violating safety policies and procedures.
16. Gambling or other illegal activity on company property.
17. Participating in business activity that competes with, damages, or interferes with your work responsibilities or results in conflicts of interest.
18. Carelessness or negligence that leads to a serious mistake, physical injury, or property damage.

Business Ethics

SEKISUI Aerospace's commitment to integrity begins with complying with laws, rules, and regulations where we do business. Further, each of us must understand the company policies, laws, rules, and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or SEKISUI Aerospace's policy, we should seek advice from the Human Resources (HR) department. We are responsible for preventing violations of the law and for speaking up if we see possible violations.

The following is a summary of the Company's policy with respect to 1) payment to government officials or personnel, 2) competition, 3) confidential and proprietary information, and 4) conflicts of interest.

Payment to Government Officials or Personnel

It is the policy of the Company to comply with all applicable anti-bribery and anti-corruption laws. SEKISUI Aerospace prohibits anyone acting on behalf of the Company from giving anything of value to a government official or any other person in any country to influence that person's decisions to help the Company obtain or retain business or gain an unfair advantage. The scope of anti-bribery laws is very broad and applies to the giving of not only money but anything of value. For example, business opportunities, gifts and entertainment, travel, special favors, and tickets to events all constitute something of value.

Competition

We are dedicated to ethical, fair, and vigorous competition. We will sell SEKISUI Aerospace products and services based on their merit, superior quality, functionality, and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for SEKISUI Aerospace or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

Confidential and Proprietary Information

Integral to SEKISUI Aerospace's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers, and other business partners. Confidential and proprietary information includes such things as pricing, financial data, customer names/addresses, or nonpublic information about other companies, including current or potential suppliers and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. We owe a duty to SEKISUI Aerospace to advance its legitimate interests when the opportunity to do so arises. We must never use SEKISUI Aerospace property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with SEKISUI Aerospace.

Here are some ways in which conflicts of interest can arise:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier, or contractor, regardless of the nature of the employment, while you are employed with SEKISUI Aerospace.
2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier, or contractor.
5. Having a personal interest, financial interest, or potential gain in any SEKISUI Aerospace transaction.
6. Placing company business with a firm owned or controlled by a SEKISUI Aerospace employee or their family.
7. Accepting gifts, discounts, favors, or services from a customer/potential customer, competitor, or supplier, unless equally available to all SEKISUI Aerospace employees.

Gifts, Gratuities, and Business Courtesies

SEKISUI Aerospace is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by SEKISUI Aerospace was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom SEKISUI Aerospace does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of SEKISUI Aerospace or customers, or would cause embarrassment or reflect negatively on SEKISUI Aerospace's reputation.

Accepting Business Courtesies

Most business courtesies offered to us in the course of our employment are offered because of our positions at SEKISUI Aerospace. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at SEKISUI Aerospace to obtain business courtesies, we must never ask for them. We may accept unsolicited business courtesies that

promote successful working relationships and good will with the firms that SEKISUI Aerospace maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when SEKISUI Aerospace is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain SEKISUI Aerospace business.

Meals, Refreshments and Entertainment

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Gifts

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom SEKISUI Aerospace does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approval is obtained from management.

Employees with questions about accepting business courtesies should talk to their managers or the HR department.

Offering Business Courtesies

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon SEKISUI Aerospace. An employee may never use personal funds or resources to do something that cannot be done with SEKISUI Aerospace resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of SEKISUI Aerospace.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, contact the HR department to ensure the appropriate corrective actions or investigation is conducted in a timely manner.

Compliance

Any violation of this policy will subject the employee to disciplinary action or immediate discharge. Any employee having knowledge of any violation of the policy shall promptly report such violation to the Human Resources department. When questions arise concerning any aspect of this policy, contact the HR department.

Policy History

Revision Date	Author	Description
8/1/20	Linda Moseley, Sr. Director of Human Resources/HR	Reformatted/revised Code of Ethics and Business Conduct Policy
2/2/23	Linda Moseley, Sr. Director of Human Resources/HR	Removed highlight from \$100 on bottom of page 5, second to last paragraph.