



DMAero, LLC, 106 Jesse Hall Ct, Byron, GA 31008

## COMPANY POLICY DOCUMENT

<b>Title:</b>	<b>Code of Ethics and Business Conduct</b>		
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<b>VERSION</b>	<b>DATE</b>	<b>SUMMARY OF CHANGES</b>
1.0	01/01/2014	Initial Release
1.1	04/29/2014	Added revision history, Revision footer
1.2	10/30/2014	Global: Changed “DM Aero” to DMAero, LLC
2.0	10/10/2015	Global: Number changed from CS-1 to HR-3111001 and Formatted to AS9100 document template,
2.1	06/29/2018	Review Audit; renumbered to DMA-CPS-0001 per QMS
2.2	11/21/2019	Review Audit; updated contacts in policy,

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Required Approvals:

QMS Administrator (QA)

Managing Member/President (Document Owner)

<b>SIGNATURES</b>		
<b>PREPARED</b>		
Printed Name: J. Douglas Cowart Title: Author	Signature: 	Date: 11/21/2019
<b>APPROVED</b>		
Printed Name: J. Michael Love Title: Managing Member/ President	Signature: 	Date: 11/21/2019
Printed Name: J. Douglas Cowart Title: Member/ Vice President	Signature: 	Date: 11/21/2019
Printed Name: Otis Harris Title: Quality Assurance/ Configuration Mgr.	Signature: 	Date: 11/21/2019

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## **Introduction**

Ethics is the foundation upon which we built this company and governs how we conduct business. Our commitment to integrity, accountability, respect and excellence has made us one of the top aerospace and defense contractors. DMAero is dedicated to providing an ethical, safe, productive workplace, free from discrimination and harassment. To achieve this goal, we have a shared responsibility to conduct ourselves ethically in our interactions with co-workers, customers, suppliers and competitors, as well as in the communities where we live and work.

This Code of Ethics and Business Conduct provides principles and guidelines that apply to everyone at DMAero, regardless of position or level of responsibility.

DMAero expects everyone who works for, or on behalf of, DMAero to act with integrity, excellence, accountability, and respect at all times.

This Code of Ethics and Business Conduct (Code) describes our commitment to these values and is our guide to ethical decision making. Ethical decisions are essential to developing trust with our customers, shareholders, colleagues, suppliers, and the community at large.

### **1. The Code of Ethics, Business Conduct, Federal, and International law**

DMAero operates in a highly regulated business environment both domestically and in countries around the world. DMAero's international business activities may be subject to both United States Government and host country laws and regulations.

Understand that the Code does not address all of the laws and regulations that may be applicable in the countries where DMAero does business. It is important that you seek guidance from DMAero's Legal Department whenever you are uncertain of how Federal and International laws may affect your work.

### **2. Following the Code of Ethics and Business Conduct**

The Code applies to everyone who does business on behalf of DMAero, including employees, officers and members of the Board of Directors. Our Company also expects that all third parties with whom we contract, including agents, suppliers, and contractors will act in accordance with the principles outlined in this Code when conducting business on DMAero's behalf.

Following the Code is mandatory, as it is essential to our Company's success and reputation. Those individuals who fail to follow the Code will be subject to disciplinary action, up to and including, termination. Disciplinary action may be taken not only against those who authorized or participated directly in the violation, but also against anyone who deliberately failed to report a violation.

In certain rare situations, DMAero may waive the application of this Code. Such waivers require the prior approval of the Board of Directors (or any committee of the Board comprised solely of independent directors.)

### **3. Employee Responsibilities**

It is your responsibility as an employee to seek guidance from your Manager and any other Company reporting resource whenever you have questions about this Code, DMAero's policies or any of the laws and regulations which apply to your responsibilities.

Discuss any concerns you might have about possible violations of the Code, DMAero's policies or any other laws and regulations with your Manager or, as more specifically directed herein, to the Chief Diversity Office or DMAero's Legal Department

Take responsibility for your own conduct. No one has the authority to make anyone violate our Code. Any attempt to direct or otherwise influence any employee to commit a violation is itself a violation of our Code.

### **4. Management Responsibilities**

It is management's responsibility to emphasize the importance of the Code to all employees and consistently encourage open communication. Management shall play a proactive role in training employees on the Code and related topics, specifically by encouraging employee participation in training initiatives and identifying potential training opportunities. Understand when to escalate business concerns and when to seek support from additional resources.

Management shall also communicate DMAero's commitment to conducting business ethically and in compliance with all laws and regulations to all third parties whom you oversee and review and confirm that their actions and behaviors are consistent with DMAero's values and with this Code.

### **5. Producing Quality Products and Services**

Delivering quality products and services that meet our customer's requirements is critical. We are a recognized leader in our industry for innovation, quality, responsiveness and value. Long-term customer relationships are built through superior performance. DMAero strictly adheres to a robust set of quality standards and always strives to exceed our customer's expectations.

To ensure we meet our quality commitments to our customers, we:

- Make achievement of high quality and excellence our personal goals;
- Strive to do each job right the first time;
- Prepare all required reports accurately, completely and in a timely manner;
- Comply with contract requirements, including design requirements, inspections, and tests; and
- Use only materials and processes conforming to quality levels specified in each contract.
- Use substitute materials or processes only if they have been approved in writing in advance by the customer's authorized representative.
- Do not knowingly misrepresent, in any way, the condition or status of services or products offered for inspection, testing, or delivery.

## 6. Specialized Government Contracting Requirements

- a. **Regulatory Compliance.** As a government contractor, we implement heightened scrutiny regarding compliance with the rules and regulations applicable to companies doing business with the government. Accordingly, we must ensure that our products and services are delivered and administered in a manner that fully complies with laws, regulations, and our contracts. The laws and regulations applicable to government contractors apply both when DMAero is acting as a prime contractor and as a subcontractor at any tier. Consultants and subcontractors that are hired by our Company to perform work related to a government contract or subcontract must also adhere to government contracting rules.
- b. **Submissions of Claims for Payment to the Government.** The law provides for significant damages and penalties for any government contractor who “knowingly” submits false claims to the government. “Knowingly” means claims that are intentionally inaccurate, as well as those that are recklessly submitted without verification that the work was performed in compliance with the requirements or without assuring that the claim is accurate. The laws and regulations associated with doing business with the government are varied and complex. In all circumstances, we must ensure full compliance with applicable requirements and we must carefully review any claims for payments.
- c. **Maintaining Accurate Business and Financial Records.** We must maintain accurate and complete business and financial records. Inaccurate or incomplete records lead to potential non-compliance with laws and regulations, as well as, a host of adverse business consequences. Additionally, our record-keeping procedures are essential to ensure that all costs are properly charged and reported. It is critical to DMAero’s reputation that our financial data and business records are current, accurate, and complete.
- d. **Financial Integrity.** Honest, accurate, and timely recording and reporting of our financial transactions is critical to our reputation. All transactions between our Company and outside individuals are entered in our books and records in compliance with Defense Contract Audit Agency (DCAA) accounting standards and in accordance with U.S. Generally Accepted Accounting Principles (GAAP). All of our records reflect each transaction fully and accurately, with proper audit trail and on a timely basis. If you have any reason to believe that a record is inaccurate, false, or misleading, contact an appropriate company resource, such as your manager for further research.
- e. **Document Maintenance.** Business records include formal records, such as financial information and government filings, and any other records created within the scope of DMAero’s business. The U.S. government requires that we maintain and retain certain records. If you have a question about whether or not to maintain a record, contact DMAero’s Legal Department.
- f. **Complying with Legal Holds.** There are certain times when you have to follow additional precautions with respect to maintaining records, such as in the event of government investigations or legal proceedings. When you learn of such ongoing or pending matters, you must retain relevant records. If you have any questions about your responsibility to maintain records, contact DMAero’s Legal Department.
- g. **Submission of Accurate Expense Reporting.** It is critical that all expense reports be completed accurately. This includes the following key points:

- Charge accurately to the correct charge number;
  - Charge all material costs correctly;
  - Follow your division's procedures for expense reporting; and
  - Make sure that all expenses are permissible by the terms of the contract.
- h. **Accurate Labor Charging.** Honest and accurate labor charge reporting is mandatory. Every DMAero employee is responsible for understanding and ensuring the accuracy of all applicable labor reporting. This means, for example, that you must charge your time accurately to the contract or contracts on which you are working. If you have any questions regarding time charging processes or procedures, you must obtain clarification from your manager.
- i. **Avoiding Kickbacks.** Soliciting or accepting anything of value to influence award of, or work under a U.S. government contract or subcontract is a violation of anti-kickback laws. A "kickback" is providing something of value (not just money, but anything of value, including gifts, entertainment, or other favors) either to reward or obtain favorable treatment on a government contract. There are serious consequences associated with failing to disclose a potential kickback. Accordingly, if you have reason to believe that a bribe or kickback has been offered or accepted by you or any other DMAero employee, you must immediately report this to DMAero's Legal Department.
- j. **Byrd Amendment.** This law prohibits the use of contract payments to pay any person for influencing, or attempting to influence, officials of the executive or legislative branches of the U.S. Government (including members of Congress and their staffs) in connection with the award or modification of U.S. Government contracts. Any questions about the propriety of payments should be raised with DMAero's Legal Department.
- k. **Competing for Government Business.** The Procurement Integrity Act provides a series of prohibitions designed to protect the integrity of the procurement process by ensuring that competitors for government contracts compete on a level playing field. The basic principles reflect that competitors, as well as government procurement officials, may not solicit, obtain, or disclose contractor bid and proposal or other proprietary or confidential information, such as source selection information, during the course of a competition. These proscriptions also restrict employment discussions with current or former U.S. Government personnel involved in competitions in which DMAero has an interest. If you receive any information that might be construed as presenting a conflict with these laws, or if you have any questions about these laws and regulations, you should contact DMAero's Legal Department.
- l. **Truth in Negotiations Act (TINA).** All cost and pricing data in support of our proposals must be accurate, complete, and current as of the date of final agreement on price. Whether you are the contract negotiator, the cost estimator, or the person responsible for furnishing data to the cost estimator, you must ensure that the data meets the Federal Acquisition Regulation (FAR) requirements. If you have a question as to whether information is cost or pricing data that must be disclosed to the U.S. Government, you should seek advice from DMAero's Legal Department.
- m. **Restrictions Applicable to Employing Current and Former Federal Government Personnel.** There are a series of laws and regulations that limit the ability to even discuss



employment or consulting opportunities with individuals who are currently employees of the U.S. Government. Before any employee may discuss employment opportunities with a current government employee, DMAero's Legal Department must be consulted. In general, the applicable laws and regulations prohibit any government contractor from gaining a competitive advantage or obtaining "inside" government information from government employees by engaging in employment discussions.

- n. **Restrictions Applicable to Employing Current and Former State Government Personnel.** There are also strict prohibitions in the work that certain former government personnel may do for DMAero. Because these rules are complicated, it is critical that you consult the DMAero Legal Department and obtain any necessary clarification before engaging in employment discussions with current government employees or assigning work to former government employees.
- o. **Access to Competitors' Information.** It is inappropriate to obtain or attempt to obtain confidential and proprietary information from DMAero's competitors. Under no circumstances may anyone introduce another company's confidential or proprietary information into DMAero's business or systems.
- p. **Use of Suspended/Debarred Contractors.** DMAero may not conduct any government-related business with any individual or company that has been suspended or debarred. Accordingly, before contracts are issued or individuals employed, the General Services Administration's "List of Parties Excluded from Federal Procurement and Non-Procurement Programs" must be reviewed.
- q. **Bribery and Corruption.** It is never permissible to offer anything of value for corrupt purposes, such as obtaining favorable treatment with a respective customer. DMAero complies with all anti-bribery and corruption laws around the world and prohibits anyone from offering, soliciting, or accepting any bribe, whether dealing with government officials, political parties, or representatives of commercial organizations. "Bribes" does not mean just money, but anything of value, including gifts, entertainment, or other favors solicited or received for an improper purpose. We expect this same integrity from all third parties, agents, and anyone else with whom we work on DMAero's behalf.
- r. **The Foreign Corrupt Practices Act ("FCPA").**
  - i. Whether you are a DMAero employee based in the United States or based abroad, the Foreign Corrupt Practices Act prohibits offering, soliciting, or providing anything of value to a foreign official, or accepting anything of value from a foreign official, for the purpose of improperly influencing decision-making. It also prohibits unlawful political contributions to obtain or retain business overseas. Finally, the Act prohibits the use of false records or accounts in the conduct of DMAero's business. We must be careful when retaining third parties to represent DMAero's interests outside the United States, as DMAero can be held liable for the unlawful actions of such third parties. DMAero's "Anti-Corruption Laws and Foreign Corrupt Practices Act Policy" must strictly be adhered to. If you have any questions, you should contact DMAero's Legal Department.
  - ii. Our business transactions should always be free from even a perception that favorable treatment was sought, received, or offered through gifts, favors, hospitality,

entertainment, or similar gratuities. Our definition of business courtesies, gifts and hospitality is broad and includes tickets, fees, or passes to sporting or cultural events, lodging, meals, door prizes, rides or transportation and other items of value. If you ever have any questions concerning gifts or entertainment, you should contact DMAero's Legal Department.

**s. Gifts and Entertainment with U.S. Government Representatives.**

- i. The U.S. Government is our largest customer, and we must respect the special laws surrounding contracting with the U.S. Government. With few exceptions, U.S. Government agencies have strict prohibitions against their employees accepting any business courtesies, including items as minute as a cup of coffee or doughnuts.
- ii. Therefore, except as otherwise permitted by law or regulation, we are prohibited from offering or providing any business courtesy, including meals, entertainment, travel, or lodging expenses for any U.S. Government employee or representative. If you deal with representatives of a particular federal agency, you are responsible for complying with that agency's standards of conduct. Where there is a question as to a particular agency's standards of conduct, you must contact DMAero's Legal Department in advance for guidance.
- iii. Similarly, those who deal with U.S. state or local government officials are responsible for knowing and adhering to the rules that may apply to such state or local government employees. Generally, such officials are often under prohibitions similar to those of U.S. Federal Government employees. Again, where there is a question as to a particular agency's standards of conduct, you must contact DMAero's Legal Department in advance for guidance.

**t. Gift and Entertainment with Foreign Government Employees and Officials.**

- i. Employees of national and local governments are subject to a wide variety of different laws and regulations. Consult your location's policies, as well as applicable laws and regulations, prior to offering anything of value to such employees.
  - ii. In instances where customs in certain countries require the exchange of gifts, DMAero will, to the extent permitted, provide the gift. Any gifts, other than those of nominal value, received from representatives of these countries will become company property.
  - iii. Whether you are a DMAero employee based in the United States or based abroad, you must understand and abide by the Foreign Corrupt Practices Act, which is described in this Code.
  - iv. You must also be careful when considering retaining agents to represent our interests outside the United States. DMAero has strict approval requirements for such consultants.
  - v. Before offering or providing anything of value to foreign public employees or officials, you must obtain advance approval from DMAero's Legal Department.
- u. Gifts and Entertainment with Non-Government Persons.** We may provide meals, refreshments, or entertainment of reasonable value to non-government persons in support of business activities, provided:

- i. The business courtesy is not offered as a “quid pro quo,” (offered for something in return for the courtesy)
- ii. The courtesy does not violate any law, regulation, or the standards of conduct of the recipient’s organization. It is our responsibility to inquire about any prohibitions or limitations applicable to the recipient’s organization before offering any business courtesy; and
- iii. The courtesy is consistent with marketplace practices, infrequent in nature, and is not lavish or extravagant. It cannot cause embarrassment or reflect negatively on our reputation.
- iv. Before offering or providing anything of value to foreign non-government persons, you must obtain advance approval from DMAero’s Legal Department.
- v. **Soliciting and Receiving Gifts and Entertainment.** Our business transactions should always be free from even a perception that favorable treatment was sought, received or offered through gifts, favors, hospitality, entertainment, or similar gratuities. While there are certain circumstances under which it is permissible to accept such items, we are expected to follow a course of action that complies with the following guidelines:
- w. **Soliciting Gratuities.** We may not solicit, directly or indirectly, for our benefit or for the benefit of another person, any gift, favor, or other gratuity from a person or organization with which DMAero does business or that seeks to do business with DMAero. Soliciting a gift, favor or other gratuity is strictly prohibited regardless of the nature or value of the item or service.
- x. **Giving and Receiving Gratuities.** We may not accept business courtesies that constitute, or could be reasonably perceived as constituting, unfair business inducements or that could violate law, regulation or policies of DMAero or its customers or could cause embarrassment or reflect negatively on DMAero’s reputation.

## **7. Anti-Boycott Laws**

- a. As a U.S. based company, everyone at DMAero, including foreign subsidiaries, must comply with U.S. laws pertaining to foreign boycotts. As part of the U.S. Anti-Boycott Act, it is unlawful to:
  - i. Furnish information about our Company’s (or any person’s) past, present, or prospective relationship with boycotted countries or blacklisted companies.
  - ii. Pay, honor, or confirm letters of credit containing boycott provisions.
- b. In the event that you receive a request to participate in or support a foreign boycott, you should report it immediately to DMAero’s Legal Department, as all requests for boycott information must be reported to the U.S. Government.

## **8. Government Investigations and Inquiries**

Given the highly regulated status of our business operations and the nature of the work we do, it is possible that government officials and members of law enforcement will contact employees of DMAero. It is imperative that employees deal with government officials and members of law

enforcement cooperatively and honestly. To ensure that our Company's interests are protected, it is also important that we respond to investigations and inquiries in an organized and thorough manner. For this reason, immediately notify DMAero's Legal Department if you are contacted by a government official or member of law enforcement.

## **9. Conflicts of Interest**

- a. **Conflict of Interest policy.** A "conflict of interest" can arise when a personal interest conflicts or appears to conflict with the best interests of DMAero. Personal interests include significant ownership in another company by you, your spouse, children, parents, or in-laws. Anyone who believes they or any other employee of DMAero may have a potential conflict of interest must notify DMAero's Legal Department, which can help you resolve any potential issues once you have disclosed the potential conflict of interest. Although DMAero encourages employees to engage in outside activities that do not conflict with DMAero's business, you must always avoid even the appearance of a conflict of interest. Examples of possible conflicts of interest include:
  - i. Financial interests can become conflicts of interest if you have a significant financial interest in a current or potential supplier, customer, or competitor.
  - ii. Personal relationships can create conflicts of interest if you have a close relationship with someone who works for a supplier, customer, or competitor. Personal relationships can also create conflicts when you manage, or are managed by, someone with whom you have a close relationship, including a romantic relationship. Even if you believe you are acting properly, your relationship may be perceived by others as improperly influencing your judgment. This can damage morale and disrupt workplace productivity.
  - iii. Taking personal advantage of business opportunities that you discover through the use of company property, information, or position are considered "corporate opportunities" and create conflicts of interest.
- b. **Outside Employment with a Supplier or Customer.** DMAero's employees may not be employed by or serve as a director or officer of a supplier or customer, unless otherwise consented to by DMAero's Legal Department.
- c. **Outside Employment with Competition.** DMAero's employees may not compete with DMAero or consult with or be employed by or serve as a director or officer of a competitor, unless otherwise consented to by DMAero's Legal Department.

## **10. Complying With Trade Controls Export and Import Compliance**

Any DMAero product, service, or technology that is created in one country and then sent across that country's borders can be considered an export. Exports include more than just the transfer of a physical item from one place to another; exports can also include the transfer of information via email or a face-to-face conversation. Export laws and regulations often restrict our sale of technical data, hardware, and/or services. In addition to monitoring export activities, most countries also have regulations that govern the entry or import of products, services, and technologies to within their borders.

There are serious penalties for violation of these laws, including the loss of export privileges as well as civil and criminal penalties. If you have any questions about export or import compliance, refer to DMAero's "Export/Import Controls and Compliance policy", which outlines the requirements for adhering to export and import laws and regulations. You can also contact DMAero's Legal Department.

## **11. Fair Competition**

We believe our customers and society at large benefit from fair, free, and open markets. Therefore, we do not engage in any practice that could be viewed as fixing prices, unfairly restraining trade, or keeping competitors out of the marketplace. Based on this, we will not:

- Communicate with competitors to discuss prices, allocate markets, boycott customers or suppliers, or limit production of services for anticompetitive purposes;
- Make false statements about our competitors; or
- Receive or use our competitor's proprietary information, including pricing information, improperly.

Fair competition is not just an issue of our own company standards. Most of the countries in which DMAero conducts business have laws designed to promote free and open competition and to prohibit activities designed to restrain trade. For more information on fair competition, contact DMAero's Legal Department.

## **12. Information Gathering**

The marketplace requires gathering a wide range of information in a systematic (and legal) manner. This information provides an understanding of the industry as well as customer requirements for existing or potential products and services. However, we will not gather our competitors' or our customers' information by inappropriate means. We are committed to avoiding even the appearance of improper information gathering and therefore may not obtain, accept, or receive:

- Any information from any customer, competitor, or other source to which DMAero is not clearly and legitimately entitled;
- Information such as proposal prices, competitor pricing or technical data, proposal evaluations, internal government estimates, or any information marked by the U.S. Government or other government entity as "Source Selection Information." You must be careful to avoid any information from any source labeled Source Selection Sensitive, "proprietary" or "confidential";
- Confidential or proprietary information in any form possessed by new hires from their prior employers; or
- A company's proprietary or confidential information made available by consultants or others who previously had a business relationship with that company.

There are also strict rules against gaining access to information relating to U.S. government procurements, which are discussed under the section "Competing for Government Business." If you ever have reason to believe that the release or receipt of any information is unauthorized, or

you are uncertain as to our right to use the information, do not copy, distribute, or use it until the situation has been reviewed and resolved by DMAero's Legal Department.

### **13. Inside Information**

Protecting the confidentiality of material, non-public information is imperative to our reputation as a trusted business partner. Selling stocks or securities on the basis of inside ("material") information acquired through the course of employment at DMAero is prohibited. "Material" information is any non-public information that a reasonable investor would consider important in making investment decisions. Examples include, but are not limited to:

- Acquisitions or divestitures discussions;
- Changes in management structure or changes at the executive level;
- Awards or cancellations of major contracts before public announcements;
- Development of new products, services, or processes; and
- Financial information (such as corporate earnings, before public release).

### **14. Respect in the Workplace**

We treat people with dignity, fairness, and courtesy. We create an inclusive environment that is focused on a common purpose where diversity in people and perspectives is valued. We cooperate across organizational boundaries, focusing on adding value and earning the trust of our teammates. We achieve success through collaborative efforts and a commitment to achieving common, defined objectives.

### **15. Avoiding Harassment**

DMAero will not tolerate harassment of any type, including physical, emotional, or sexual harassment. This prohibition extends beyond co-workers and includes suppliers, customers, and anyone else who does business with DMAero. Harassment can diminish the dignity of a person, create an offensive or otherwise hostile work environment, and interfere with work performance. Some examples of harassment include, but are not limited to:

- Bullying;
- Sexual remarks, threats, gestures, or requests for sexual favors;
- Questions or conversation about sexual activities;
- Unwelcome or inappropriate touching;
- Displaying sexually suggestive pictures or objects;
- Verbal or physical threats of any type; and
- Offensive remarks including, race, national origin, or sexual orientation.

If you experience or witness any type of harassment, report it immediately to Human Resources. If you have additional questions about harassment, review DMAero's Policy against Harassment contained in the DMAero, LLC's Affirmative Action Plan or contact Human Resources.

## **16. Avoiding Discrimination**

We are an equal opportunity employer. We are committed to treating all employees and applicants for employment with respect and dignity and to maintaining a workplace that is free from unlawful discrimination. We recruit, hire, develop, promote, discipline, and provide other conditions of employment without regard to race, color, religion, national origin, gender, age, disability, marital or partnership status, veteran status, disabled veteran status, sexual orientation, gender identity, and any other category protected by law. If you experience or witness any type of discrimination, report it immediately. If you have additional questions about discrimination, review DMAero's Policy against discrimination contained in the DMAero, LLC's Affirmative Action Plan or contact Human Resources.

## **17. Diversity and Inclusion**

We appreciate that every individual in our company brings a unique background and perspective, as well as a unique set of abilities. Leveraging our diversity creates innovative solutions and enhances our delivery of world class customer service.

## **18. Maintaining a Safe and Healthy Workplace**

DMAero is committed to conducting operations and activities in a manner that provides and maintains safe and healthful working conditions, protects the environment and conserves natural resources. In meeting this commitment, it is DMAero's policy that no employee shall engage in any conduct that violates any environmental, health, or safety law, or is otherwise inconsistent with the highest levels of corporate responsibility to the health and safety needs of our employees and the environmental needs of our communities.

It is always important to pay close attention to safety risks such as:

- Not blocking access to fire exits, fire extinguishers, or electrical panels;
- Not disregarding safety or environmental rules and regulations;
- Wearing personal protective equipment; and
- Promptly reporting workplace related injuries, regulatory violations, or unsafe conditions.

If you notice any unsafe conditions, report them to your manager immediately.

## **19. Workplace Violence**

As part of our commitment to safety, our workplace must be free from physical violence. Workplace violence takes many forms, such as:

- Threats of violence toward any person or company facility;
- Stalking;
- Suicide threats;
- Domestic violence affecting the workplace;
- Weapons or threats related to weapons;

- Sabotage of property; and
- Any behavior that raises concerns about violence or risk to others.

DMAero prohibits weapons in the workplace. DMAero takes threats very seriously. If you witness or become aware of any possible violent threats, contact your manager or DMAero's Legal Department immediately.

## **20. Prohibited Substance Abuse**

DMAero is committed to a safe and healthy workplace for everyone. Use of illegal drugs or alcohol abuse can create serious safety risks. The possession, sale, or use of illegal drugs, or being under the influence of such drugs, on company time, property, or at company-sponsored events is prohibited.

We also prohibit the consumption of alcohol on company property or on company time, in connection with company business, or in a manner that would influence the performance of tasks and responsibilities. However, in some instances, employees may consume alcoholic beverages at company-sponsored events when authorized by management and when appropriate monitoring is in place. DMAero, at its discretion, may take into account common practices in countries where moderate consumption of alcohol to accompany a meal is common practice. In any case, all employees are held accountable for ensuring that their performance and judgment are unimpaired by alcohol during working hours.

## **21. Safeguarding Confidential Information**

At DMAero, we own, create, or have access to a significant amount of "sensitive information" (e.g., confidential or proprietary information) in the course of conducting our business. We must protect the confidentiality of all sensitive information whether obtained from or relating to DMAero and/or suppliers, customers, or other third parties. You should not disclose (even to family) or use any sensitive information for any purpose other than on a "need-to-know" basis within DMAero. This obligation lasts during your entire employment and at all times thereafter.

Because of the extremely sensitive nature of our business, if you must disclose information outside of our Company (for business or legal reasons), contact DMAero's Legal Department. They will assist you in discussing and implementing proper protective measures before disclosure or use of the information. If you are uncertain or unsure about what information is sensitive, you should also contact DMAero's Legal Department.

When DMAero executes confidentiality agreements, with a third party regarding sensitive information to be received by DMAero, you must honor the terms of such an agreement. We each have an obligation to protect the security and confidentiality of our information systems. We must:

- Comply with the "Information Assurance Workforce Improvement Program" DoD 8570.01-M;
- Protect information used to access company information systems, including user IDs, passwords, and building-access key cards;
- Protect the confidentiality and security of our information systems; and



- Protect information systems from damage, including physical damage and virus-caused damage.

## **22. Protecting Employee Privacy**

We are committed to protecting the privacy of all of our employees. Only employees who are authorized and who have a work-related reason may access company personnel and medical records. Personnel and medical records should contain only employment-related information.

## **23. Protecting Company Assets and Property**

Protecting all assets of DMAero at all times is an important responsibility. Company assets can include:

- Physical Assets (e.g., phones, equipment, and facilities);
- Financial Assets (e.g., funds); and
- Information Assets (e.g., product designs, technical data, computer software, and proprietary information).

If you are working with DMAero's data, designs, or proprietary information, you must be sure not to make any accidental or unauthorized disclosure of this information. This means adhering to any nondisclosure agreements, paying attention and preserving Company proprietary markings, and not transmitting information by email unless the email is appropriately encrypted or otherwise protected.

When using a corporate asset, always consider whether your action is in the best interest of DMAero. As a general rule, corporate assets should be used for business purposes only. There might be situations where occasional personal use of corporate assets is appropriate, such as to make a call to order lunch or to use the internet to review a plane schedule. This type of use is appropriate as long as it is neither excessive nor disruptive to the workplace.

## **24. Intellectual Property**

As with our responsibilities for protecting the physical and financial assets of DMAero, it is equally important to protect DMAero's intellectual property. Intellectual property includes confidential information and trade secrets as well as copyrights, patents, and trademarks. Each of us is responsible to protect DMAero's intellectual property in accordance with intellectual property laws and regulations. Additionally, you may not misuse anyone else's intellectual property. The laws and regulations in this arena are complicated. Accordingly, you should consult DMAero's "Copyright Compliance policy" whenever questions arise. If you have specific copyright questions you should contact DMAero's Legal Department.

## **25. Use of Information Systems**

Our information systems are critical to our day-to-day business activities and we must use them responsibly. This means always putting DMAero's interests first to ensure that these systems operate as they should. In order to protect DMAero's information systems:

- Always use strong passwords, user ID's and building-access keycards to prevent security breaches;
- Never leave mobile phones or laptops unattended or in non-secure locations; and
- Always secure computers and workstations.

There are certain activities that can threaten the integrity of DMAero's information systems and are never acceptable during working hours or on personal time. These include:

- Engaging in improper communications over DMAero's information systems;
- Visiting inappropriate Internet sites from DMAero's information systems;
- Distributing confidential information from DMAero's information;
- Installing unapproved hardware or software on DMAero's information systems; and
- Conducting outside business not related to your work at DMAero over DMAero's information systems.

It is also important to be mindful that communications that take place over DMAero's information systems are not necessarily private and DMAero cannot guarantee confidentiality.

DMAero reserves the right (where legal to do so) to monitor or make records of all such communications to verify compliance with policies or for other legitimate business reasons. Finally, if you work at a government facility or have authorized access to a government information system, you must understand and strictly follow all procedures and requirements for using the government's system. Compliance with the Department of Defense's Information Assurance Workforce Improvement Program, Department of Defense Manual - DoD 8570.01-M is mandatory at DMAero, LLC. A copy of the manual is available online and at the offices of DMAero.

## **26. Careful Communication**

- a. **Communications with the Media.** DMAero has appointed designated individuals to respond to all media inquiries. Unless you have been designated as a DMAero spokesperson, you may not respond to media inquiries. If you are contacted by the media, contact the Corporate Communications Officer immediately.
- b. **Social Media.** "Social Media" is loosely defined as any media publicizing, selecting, or exchanging user-generated content to the public. This includes social networking sites, blogs, multimedia sites, and other information sharing vehicles. Responsible use of social media is essential to safeguarding our company's confidential information. Although the use of social media may be authorized in some instances, using social media responsibly means adhering to the following principles:
  - i. Never disclose DMAero confidential or proprietary information;
  - ii. Never disclose customer's or supplier's confidential or proprietary information; and
  - iii. Never represent yourself as speaking on behalf of DMAero, unless authorized to do so.

If you have any questions about the appropriate use of social media, contact your manager or the Corporate Communications Officer.

## **27. Good Corporate Citizenship**

DMAero takes its commitment to good corporate citizenship extremely seriously. DMAero complies with all applicable laws and regulations, respects human rights, provides fair working conditions, and prohibits discrimination, harassment, unfair working conditions and the use of any forced, compulsory, or child labor.

## **28. Political Participation and Activities**

DMAero supports personal participation in the political process and encourages all employees to support the political parties and candidates of their choice. We must understand, however, that our involvement and participation in the political process must be on an individual basis, on our own time, and at our own expense. Many countries prohibit corporations from donating corporate funds, goods, or services (including employees' work time), directly or indirectly, to political candidates.

Because the laws in this area are complex, contribution of DMAero's funds or the use of DMAero's assets or facilities for the benefit of political parties or candidates anywhere in the world is prohibited, unless approved in advance by DMAero's Legal Department.

## **29. Lobbying**

Lobbying activities are subject to specific rules that cover a wide range of activities. "Lobbying" involves communications with legislators, regulators, or their staff in an effort to influence legislative or certain other administrative actions. For this reason, it is important that all contacts with officials regarding public policy are coordinated through DMAero's Legal Department, as all lobbying activities must be disclosed and carefully regulated.

## **30. Respecting our Environment and Conducting Sustainable Business Practices**

DMAero is committed to conducting operations and activities in a manner that protects the environment and conserves natural resources. DMAero's policy is that no employee shall engage in conduct that violates environmental laws or regulations. We are also committed to the continual improvement of our environmental management systems as well as the prevention of pollution.

## **31. Raising Concerns**

If you ever have questions about the Code or concerns of a possible violation, it is imperative that you raise them. You should never feel uncomfortable coming forward with business conduct concerns, and the sooner you raise your concerns, the sooner DMAero can help resolve them. Any such concerns should be raised by contacting DMAero's Legal Department.

## **32. Mandatory Reporting Obligations**

We are required by the Federal Acquisition Regulation (FAR) to disclose credible evidence of criminal law violations involving fraud, conflicts of interest, bribery, or gratuities, in addition to

others when working on government contracts. To comply with these obligations, all DMAero employees must immediately report any issues that could potentially constitute a violation of criminal or civil law, or a significant overpayment on a government contract or subcontract, to DMAero's Legal Department. Reporting these issues is mandatory.

### **33. How to Raise Concerns**

Depending on the nature of the concern, it might be appropriate to start by discussing the issue with the person involved. If that would not be productive, employees should always feel free to contact their manager. If you are not comfortable doing that, you may contact DMAero's Legal Department.

### **34. After Raising a Concern**

We take all reported concerns seriously. We will evaluate all matters brought to DMAero's Legal Department. At your request, we will make every effort to keep your identity confidential while conducting a thorough and fair review. To assist in maintaining confidentiality, you should refrain from discussing the matter with co-workers or anyone else. If you have chosen to remain anonymous, you will be given an identification number that will allow you to follow-up at your discretion for a status update. If you have raised a concern with your manager or another resource, you can expect that they will follow up with you within a reasonable time. While they may not be able to disclose specific details, they will likely be able to provide a high-level summary.

### **35. Our Non-Retaliatory Culture**

Everyone at DMAero who comes forward with concerns plays an important role in maintaining a healthy, respectful, and productive workplace and protects our customers, shareholders, colleagues, suppliers, and the community at large. Raising concerns helps us address problems early before potentially more serious consequences develop. Retaliation in any form against an individual who in good faith reports a violation of the Code or of the law, even if the report is mistaken, or assists in the investigation of a reported violation, is a serious violation of this Code and of law. Every DMAero employee has an obligation to create an environment free of retaliation. It is, therefore, DMAero's policy to strictly prohibit any form of retaliation against anyone who raises a concern.