



**StandardAero**  
Code of Ethics



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# Message from the CEO

Dear StandardAero Colleagues:



Welcome to the latest update of the StandardAero Code of Ethics (“the Code”). This booklet outlines our legal and ethical responsibilities as well as our company’s expectations for ethical behavior for all StandardAero Team Members. I expect everyone in our organization to become intimately familiar with our Code of Ethics, policies, procedures and our training courses. While these documents and programs are critical to establishing our business integrity and ethics, it is ultimately our actions that must prevail to successfully operate our business every day, in any situation.

It is imperative that our company continues operating with the values of “ethics and honesty above all.” Our culture requires both policies that encourage the reporting of any ethical, legal, procedural and policy concerns or violations along with behaviors that support the highest level of ethics and integrity in our work environment.

Specifically, the Code requires you to obey the law by following all applicable rules and regulations, and to be honest, open, and maintain a high degree of integrity in all your business dealings. If there is ever a question of ethics, the company and our leadership provides multiple avenues for you to surface any issue and we will protect all employees from any form of retaliation unless they knowingly and willingly violate the Code. StandardAero fosters an environment of trust, where all employees should feel comfortable raising issues or concerns to their supervisors, management or our employee concern hotline.

Every employee is critical to the company's integrity. We all have the responsibility of making correct choices and sound ethical decisions in every aspect of our jobs, every day. Thank you for your compliance and commitment to our Code of Conduct.

Sincerely,

A handwritten signature in blue ink, appearing to read "Russell", with a stylized, cursive script.

Russell Ford

CEO

**StandardAero**

# OUR MISSION

IS TO EXCEED CUSTOMER  
EXPECTATIONS THROUGH  
INSPIRED TEAMWORK.



StandardAero

# OUR VISION

**IS TO DELIVER EXCEPTIONAL  
AEROSPACE SERVICES POWERING OUR  
CUSTOMERS' MISSIONS WORLDWIDE.**



**StandardAero**







# OUR VALUES

## **Integrity**

Is widely trusted, honest and credible. Demonstrates strong moral and ethical principles and values. Does the right thing.

## **Safety and Sustainability**

Commits to staying safe and healthy in the workplace. Focuses on contributing to a more sustainable environment.

## **Quality and Service**

Strives to the highest standards of product and service quality. Seeks to exceed customer expectations and deliver on schedule.

## **Accountability and Dependability**

Owens and accepts responsibility for actions and outcomes. Can be relied on to do what is required both on time and accurately.

## **Teamwork and Communication**

Works collaboratively with Team Members, embracing diverse viewpoints. Keeps an open dialog to drive outstanding results.

## **Continuous Improvement and Innovation**

Seeks out ways to constantly raise the Standard and improve work. Looks for new ways to do things differently and better.

## To Whom Does the StandardAero Code of Ethics Apply?

All directors, officers, and employees of StandardAero and its subsidiaries (hereinafter “Team Members” and the “Company,” respectively) are required to comply with this StandardAero Code of Ethics (“Code”).

StandardAero endeavors to work only with vendors, suppliers, and other external parties (each a “Third Party”) that share StandardAero’s commitment to ethics, integrity, and compliance with applicable laws. StandardAero expects all external parties to comply with all applicable laws when operating for or on behalf of StandardAero. StandardAero also expects Third Parties that work on its behalf to comply with the general principles set forth in this Code.

## Your Responsibilities and Rights Under this Code

All Team Members contribute to StandardAero’s culture of compliance by understanding StandardAero’s policies, embracing StandardAero’s commitment to integrity and acting to enforce compliance and avoid violations.

**Responsibilities:** In order to ensure that StandardAero’s Code of Ethics works, we all have certain responsibilities.

First, you have the responsibility **to comply with all applicable laws and StandardAero policies and procedures**, including this Code of Ethics. You are expected to use good judgment and avoid even the appearance of impropriety. Though this Code of Ethics does not address every single situation you may encounter, this Code of Ethics provides you with guidance and examples for making the right decision in a variety of situations.

Second, if you are in a supervisory role, you also **have the responsibility for ensuring that your subordinates understand their obligation to abide by this Code, other StandardAero policies and procedures, and applicable laws.**

Third, where permitted by local law, **you are also required to report suspected violations of this Code of Ethics, any StandardAero policy or procedure, or applicable law by other Team Members or Third Parties.** You cannot delegate this duty to someone else, or assume someone else will make a report. Compliance is everyone's responsibility. Failing to report a known or suspected violation is itself a violation of this Code of Ethics. If you see or learn of something that you think is a violation, you must report it. However, you should not initiate or conduct an investigation on your own.

If you have questions about this Code or concerns that its standards are not being met, or if you need to report a violation, you should contact your manager, functional leader, human resources, the Chief Compliance Officer, the *MyVoice* hotline, or legal the Chief Legal Officer or your division's Legal Counsel:

***MyVoice Hotline***

[www.standardaero.ethicspoint.com](http://www.standardaero.ethicspoint.com)

1-866-727-4714 North America

0800-91-3985 France

0808-234-9814 UK

800-110-2352 Singapore

In many instances, talking to your manager will answer your questions or help you to better understand the situation. If you are uncomfortable talking to your manager, the functional group responsible for your specific interest or your local human resources office should be able to help you and address your concerns.

**Rights:** You have the right to have any report you make handled in a confidential and professional manner. Your confidentiality will be protected, consistent with legal requirements and the requirement to fully investigate, report and correct any ethical misconduct. Although you may make a report anonymously, our investigation will be easier if you identify yourself, and we will be able to inform you of the results of our investigation. In all cases, information is restricted to those directly involved with an investigation or inquiry. You will never be threatened as a result of reporting a suspected violation, and no action will be taken against you for reporting a suspected violation in good faith. Retribution or reprisals against employees for reporting suspected violations, or cooperating with an investigation, in good faith, are strictly prohibited.

**Results:** If a violation of the Code is discovered, those responsible will be subject to disciplinary action. That action could range from a verbal reprimand to termination (or removal from the Board of Directors, as appropriate). Any willful violations of applicable laws will result in termination of employment. In some cases, the Company could pursue civil legal action against the person committing the violation, for any loss or damages. In appropriate situations, criminal charges could be filed. Team Members who encourage others to violate these standards, or who withhold information about a violation of the Code will also be disciplined. Likewise, managers who ignore violations, or who could have prevented a violation through proper supervision, will be subject to discipline. Any Team Member who retaliates against an employee making an ethics report in good faith, or cooperating with an investigation, will be subject to discipline.



## Ethics Red Flags

If you hear or come across any of the following, you should report them immediately:

*"Remember, we didn't have this conversation."*

*"I'm just following orders."*

*"The ends justify the means."*

*"Delete this after reading."*

*"Everyone else is doing it."*

*"I know it's wrong, but my manager told me to do it."*

*"It's an internal part. Who will know?"*

*"No one will ever know."*

*"It doesn't matter how it gets done."*

*"No one will get hurt."*

*"Having this information will destroy the competition."*

*"Well, maybe just this once."*

*"I was never here."*

*"If we don't do it, someone else will!"*

## Ethics Integrity Check

When in doubt, ask yourself:

1. Are my actions legal?
2. Am I being fair and honest?
3. Will I later second-guess my actions?
4. Will my actions stand the test of time?
5. How will I feel about myself afterwards?
6. How will this look in the morning paper?
7. What would I tell my kids to do in this situation?
8. How would I feel if my mother knew what I was doing?
9. How will my manager react when I brief the team at our next meeting?
10. Are my actions consistent with StandardAero's values?

## Penalties for Violations of this Code

Team Members who violate the spirit or letter of StandardAero's Code, policies and procedures or applicable laws are subject to disciplinary action up to and including termination of employment. Misconduct that may result in discipline includes:

- Violating StandardAero's Code policies or procedures;
- Violating laws applicable to StandardAero's business;
- Requesting others to violate StandardAero's Code policies or procedures or applicable law;
- Failure to promptly raise a known or suspected violation of StandardAero's Code policies or procedures or of applicable laws;
- Failure to cooperate in StandardAero investigations of possible Code, policy or procedure violations or of any potential illegal activity;
- Retaliation against another Team Member for reporting an integrity concern; or
- Failure to demonstrate leadership and diligence to ensure compliance with this Code, StandardAero policies and procedures and applicable law.

**StandardAero absolutely prohibits retaliation.**

## Code of Ethics

This Code of Ethics supports and sustains our business values, principles and mission. This Code is intended to help you understand your personal responsibility as a StandardAero Team Member and can serve as a guide any time you are faced with an ethical decision. Additionally, if you are not sure of how to act, you should ask your manager or the Human Resources department. The Code is divided into four major ethics areas. Each deserves your full attention and understanding:

- Working with customers and suppliers
- Corporate, government and international relations
- In the StandardAero community
- Protecting resources

## Waiver of this Code of Ethics

Any waiver of this Code of Ethics for our directors, executive officers or other principal financial officers may be made only by our Board of Directors and will be disclosed to the public as required by law or the rules of the New York Stock Exchange, when applicable. Waivers of this Code for other employees may be made only by our Chief Executive Officer or Chief Legal Officer and will be reported to our Audit Committee.

**Compliance is about obeying laws and regulations. Ethics and integrity are an attitude – what you do when no one's watching.**

## Working with Customers and Suppliers

### Comply with Legal Requirements

Obeying the law is the foundation on which StandardAero's ethical standards are built. All business activities must be based on the principles of honesty, integrity and fair dealing. These are key criteria for the selection and retention of employees and Third Parties to represent StandardAero. Third Parties, and all other persons representing the Company, must agree to be bound by this Code of Ethics and applicable policies, procedures and laws.

#### WHAT TO KNOW

We will conduct our business in full compliance with all applicable laws and regulations.

#### WHAT TO DO

Special requirements exist for government customers, both for foreign and domestic government customers. The laws and regulations related to government contracting are far-reaching and complex. If you deal with government customers in your job, ensure that you are familiar with those requirements.

**Comply with the spirit of the law:** Compliance with the law does not comprise our entire ethical responsibility. We elect to be bound, not only by the letter of the laws, but also by the spirit of those directives. StandardAero is committed to adopting and sustaining the highest domestic and international legal standards, including in terms of anti-corruption compliance.

# Anti-Bribery and Anti-Corruption

## WHAT TO KNOW

Most countries throughout the world have adopted anti-corruption laws that prohibit improper payments and bribery. It is StandardAero's policy to comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (the "FCPA"), the U.K. Bribery Act 2010, Canada's Corruption of Foreign Public Officials Act, and the local laws of the countries in which StandardAero conducts business. It is your responsibility to understand what laws or regulations govern your conduct, and to comply with those governing laws and regulations.

Offering, promising, giving, soliciting, accepting or authorizing an improper payment or bribe, either directly or indirectly, to gain a business advantage is ***never*** acceptable and exposes you and StandardAero to possible criminal prosecution and monetary fines and penalties. **StandardAero *strictly prohibits* corruption, bribery and improper payments in all business dealings, in every country around the world, within both the government and private sectors.**

Improper payments should not be confused with reasonable, appropriate and limited business expenditures (e.g., Company-logo gifts and customer travel and accommodation expenses directly related to the promotion of products or services, strengthening the business relationship, or the execution of a contract). These expenditures may be permitted, subject to specific StandardAero guidelines in relevant Company policies and procedures, including but not limited to the StandardAero Anti-Corruption Policy and the StandardAero Anti-Corruption Compliance Procedures. Strict compliance with this Policy and these Procedures is required of all employees and Third Parties (as applicable). No supervisor or manager may authorize you violate any law or this Code.

As a U.S. Issuer, StandardAero is required to comply with the FCPA's accounting provisions, which require that StandardAero and its consolidated subsidiaries make and maintain complete and accurate books and records in compliance with the Company's internal controls. All Team Members have a responsibility to help the Company ensure compliance with these requirements in connection with the performance of their job functions and responsibilities.

## WHAT TO DO

**Before offering or giving gifts**, meals or travel expenses, or providing anything of value to anyone – whether in the private or public sector – **make sure you understand and comply with applicable legal requirements, the customer's rules, this Code of Ethics, StandardAero policies and procedures, and all applicable provisions in the existing contract.** You must obtain any required approvals before incurring such expenses and keep accurate records and receipts in accordance with the Company's policies and procedures.

**Never offer a business courtesy**, such as a gift, a contribution (including donations to charities), a meal or entertainment, under circumstances **that might create even the appearance of impropriety** – review the Company's policies and procedures before offering or providing business courtesies.

**Never offer, promise, pay, give or authorize the giving of anything of value** (for example, money, goods or services) to anyone, including Government Officials, **in order to improperly obtain or retain business or otherwise secure an improper advantage.** Consult the Anti-Corruption Policy and the Anti-Corruption Manual for more guidance on who constitutes a Government Official, and when in doubt, always ask either the Chief Legal Officer or the Chief Compliance Officer.

**Never make any payment, regardless of amount, to a Government Official to expedite a routine administrative action.** If you are unsure if a payment is permissible, seek guidance *in advance* from the Chief Legal Officer or the Chief Compliance Officer.

**Report any requests or demands for improper payments or any suspected violations of anti-corruption laws** immediately to the Chief Legal Officer or the Chief Compliance Officer.



**Comply with StandardAero's due diligence procedures** prior to engaging Third Parties, including but not limited to persons or entities acting on behalf of StandardAero. After retaining a Third Party, remember to work with the Chief Legal Officer or the Chief Compliance Officer to ensure StandardAero has sufficient oversight of the Third Party's activities on behalf of StandardAero, including obtaining proper anti-corruption certifications from the Third Party.

**Ensure there is a written agreement with every Third Party**, which has been approved by the Anti-Corruption Manager.



# Supplier Relationships

## WHAT TO KNOW

StandardAero's relationships with suppliers are required to be based on lawful, efficient and fair practices. We expect our suppliers to obey the laws that require them to treat workers fairly, provide a safe and healthy work environment and protect environmental quality. Following StandardAero guidelines helps ensure that our supplier relationships will not damage StandardAero's reputation.

## WHAT TO DO

**Comply with applicable laws** and government regulations covering supplier relationships.

**Do business** only with suppliers that comply with local and other applicable legal requirements and StandardAero guidelines relating to labor, the environment, health and safety.

**Follow government acquisition regulations** when purchasing materials and services for fulfilling government contracts.

**Follow Company policies and procedures**, including due diligence and oversight procedures, when engaging with suppliers.

**Provide a competitive opportunity** for suppliers to earn a share of StandardAero's purchasing volume, including small businesses and businesses owned by the disadvantaged, minorities, women and disabled veterans.

**Safeguard StandardAero's confidential and proprietary information** with a confidentiality agreement, and safeguard any supplier-provided information protected by any confidentiality agreement.

**Safeguard "personal data"** obtained from suppliers (for additional guidance, see the "Privacy" section of this Code.)

## WHAT TO WATCH OUT FOR

**Choosing suppliers** on any basis other than open, competitive bidding.

**Potential conflicts of interest** in supplier selection, such as accepting improper gifts or other items of value.

**Directing business to a supplier** owned or managed by a relative or close friend.

**Unsafe conditions** in supplier facilities.

**Apparent disregard** of environmental standards in supplier facilities.

**Entrusting "personal data"** or confidential information to suppliers without ensuring that they have appropriate technical, physical, and organizational measures to prevent unauthorized access or use.

**Suppliers which delay** or refuse to provide documentation that their products or parts are free of Conflict Minerals as required by law.

**Requests from suppliers** to deviate from standard shipping or invoicing processes and schedules to help meet or manipulate financial reporting requirements or delay or avoid tax obligations.

# Trade Controls

## WHAT TO KNOW

Trade Control laws affect the release of goods, services and technology across national borders. These laws apply to many aspects of StandardAero's operations – not just shipping products. Exchanges of information across national boundaries, including email and web access, are subject to trade controls. The United States also controls the release of technical information to non-U.S. nationals within the United States. It is important that we carefully observe International Trade Control laws in connection with these activities. The StandardAero Global Trade Compliance Group (GTCG) handles all issues related to export, import, and other trade control laws and regulations.

## WHAT TO DO

**Follow relevant laws and regulations** of all countries in which you operate as well as StandardAero's policies and procedures as they relate to importing and exporting goods, technology, software, services and financial transactions.

**Provide all relevant information** to the GTCG to ensure accurate and complete import declarations. Ensure StandardAero or its agent provides accurate and complete information to government authorities.

**Check the export classification** of the product, software or technology with the GTCG prior to export to determine whether special authorization is required. Ensure that all shipping documents are prepared and submitted correctly and reflect the proper shipping authorization or permit.

**Obtain prior approval** or licensing for international transfer of military equipment and technology. Such transfer is restricted by the U.S. International Traffic in Arms Regulations (ITAR) and has specific reporting requirements. Exports of ITAR-controlled hardware or technology must be approved by the GTCG.

**Prepare and submit proper import documentation** to avoid costly and embarrassing fines and seizures by government customs departments. GTCG can assist to ensure accurate information.

**Provide the GTCG with all relevant information** necessary to screen your transactions against all applicable rules that restrict transactions with certain sanctioned countries, persons and prohibited end uses. Provide the GTCG with all relevant information necessary to screen all parties to international transactions, including but not limited to customers, end-users, business partners, suppliers, intermediaries, and financial institutions involved in your international transactions against government-provided watch lists.

**Do not cooperate with any restrictive trade practice** or boycott that is prohibited or penalized under U.S. law. If you are ever asked to take any action that might constitute participation in a restrictive trade practice or boycott, such as being asked to sign a contract or service agreement that states that StandardAero will not use certain vendors, or which restricts which countries we can ship goods through, contact GTCG immediately for guidance on how to proceed.

### WHAT TO WATCH OUT FOR

**Any facts, or “red flags,”** that suggest your customer may be attempting to evade International Trade Control laws.

**Evasive, reluctant or otherwise unsatisfactory answers** by a customer to questions about end use, end user, delivery dates or delivery locations.

**Transactions involving an embargoed country**, a citizen or representative of an embargoed country or an individual or entity subject to government sanction.

**Invoices on imported goods** where the price shown does not reflect the full value, the description of the goods is not complete, or the country of origin is not correctly identified.

**Any payment to the exporter** or benefiting the exporter that is not included in the invoice price or otherwise reported.

**Transfer prices** between related parties that fail to cover appropriate costs and profits.

**Use of an import tariff classification** that does not seem to describe the imported goods accurately.

**Designation of StandardAero as the importer of record** (i.e., party responsible for an importation) without maintaining processes to comply with import laws.

**Entry of goods under a preferential duty program** (e.g., GSP, USMCA, etc.) without supportive procedures assuring compliance with the program's requirements.

# Money Laundering

## WHAT TO KNOW

People involved in criminal activity – e.g., terrorism, narcotics, bribery, and fraud – may try to “launder” the proceeds of their crimes to hide them or make them appear legitimate. More than 100 countries now have laws against money laundering, which prohibit conducting transactions that involve proceeds of criminal activities. A related concern is that legitimate funds may be used to finance terrorist activity – sometimes called “reverse” money laundering.

StandardAero is committed to complying fully with all anti-money laundering and anti-terrorism laws throughout the world. StandardAero will conduct business only with reputable customers involved in legitimate business activities, with funds derived from legitimate sources. Each StandardAero business is required to take reasonable steps to prevent and detect unacceptable and suspicious forms of payment. Failing to detect customer relationships and transactions that place StandardAero at risk can severely damage StandardAero’s integrity and reputation.

## WHAT TO DO

**Comply with all applicable laws** and regulations that prohibit money laundering and support and financing of terrorism, and that require the reporting of cash or suspicious transactions. Understand how these laws apply to your business.

**Know your customer.** Collect and understand documentation about prospective customers, agents and business partners to ensure that they are involved in legitimate business activities and their funds come from legitimate sources.

**Follow Company policies** concerning acceptable forms of payment. Learn the types of payments that have become associated with money laundering (for example, multiple money orders or travelers checks, or checks on behalf of a customer from an unknown third party.)



**If you encounter a warning sign** of suspicious activity, raise your concern with the Finance and Legal Department and be sure to resolve your concern promptly before proceeding further with the transaction. Ensure the resolution is well documented.

## WHAT TO WATCH OUT FOR

**A customer, agent or proposed business partner** who is reluctant to provide complete information, provides insufficient, false or suspicious information, or is anxious to avoid reporting or record keeping requirements.

**Payments** using monetary instruments that appear to have no identifiable link to the customer, or have been identified as money laundering mechanisms.

**Attempts by a customer** or proposed business partner to pay in cash.

**Early repayment** of a loan in cash or cash equivalents.

**Orders, purchases or payments** that are unusual or inconsistent with the customer's trade or business.

**Unusually complex deal structures**, payment patterns that reflect no real business purpose, or unusually favorable payment terms.

**Unusual fund transfers** to or from countries unrelated to the transaction or not logical for the customer.

**Transactions involving locations** identified as secrecy havens or areas of known terrorist activity, narcotics trafficking or money laundering activity.

**Transactions involving foreign shell or offshore banks**, unlicensed money remitters or currency exchangers, or non-bank financial intermediaries.

**Structuring of transactions to evade record keeping** or reporting requirements (for example, multiple transactions below the reportable threshold amounts).

**Requests to transfer money** or return deposits to a third party or unknown or unrecognized account

# Privacy

## WHAT TO KNOW

StandardAero is committed to handling personal data responsibly and in compliance with applicable privacy laws. A growing number of countries are more stringently regulating the collection and use of consumers' personal data (e.g., names, home and office contact information, and other data). In addition, many countries regulate personal data of company representatives in business to-business transactions, as well as personal data relating to employees of the company. Misuse of the personal data that we are entrusted with can result in significant fines and other penalties being levied against StandardAero, which is why it is critical that all StandardAero Team Members understand and adhere to company policies when handling personal data.

## WHAT TO DO

**Learn and comply** with the policies of StandardAero and any contractual obligations that apply relating to the handling of personal data.

**Collect and use personal data** for legitimate business purposes only. In other words, you should use and share personal data only for the purposes for which it was originally collected. If personal data is no longer needed, it should be marked for retention / disposition.

**Use “deidentified” data or “aggregated” data** (i.e., so an individual is not identifiable) instead of personal data where appropriate or required.

**Limit data access** to people who need it for a legitimate business purpose.

**If you learn that personal data has been used improperly** or if you learn or suspect that the security of any system or device containing personal data has been compromised, immediately notify your manager and IT for further investigation in accordance with StandardAero's Incident Response Plan.

## WHAT TO WATCH OUT FOR

**Unusual or time-sensitive requests** for either your credentials or to disclose personal data outside the company. For instance, bad actors will often use techniques designed to convince you to provide your company credentials or other information to them, typically involving a sense of urgency or an email purporting to be from a colleague's personal email address requesting you to perform an unusual request, such as sending them a file containing sensitive or personal data. If you suspect this to be the case, do not hesitate to reach out to the IT department to confirm legitimacy.

**Inadequate access or security controls** for personal data, such as distributing personal data to a larger group than legitimately needed, or leaving printouts with personal data at a printer, copy machine or fax machine for others to see.

**Sharing of personal data** with unaffiliated third parties, such as vendors or suppliers, who lack appropriate security safeguards or restrictions on information use.

**Transfers of personal data** between countries, without considering applicable legal requirements.

**If questions arise**, consult the Legal Department before disclosing information that may contain personal data.



## Corporate, Government and International Relations

*We are entitled to a large payment from a government customer if we certify that project installation has been completed. We're not sure whether a few small items have been installed yet, but they should be soon. It's getting close to year-end, and we'd like to book the payment. Can we submit our invoice and certification now?*

No, you cannot submit the invoice and certification until you are certain that the entire installation has been completed in accordance with the contract. Submission of an incorrect certification could subject the Company, and you personally, to criminal penalties. Therefore, it is extremely important that all certifications submitted to the government be current, accurate and complete.

## Political Activity

Team Members are encouraged to participate in local and national politics in their individual capacity and in accordance with all applicable laws and regulations. Any political participation by or on behalf of the Company must comply with this Code, all other policies and directives, and applicable laws and regulations.

### WHAT TO KNOW

Involvement by Team Members in civic and community activities in their own, individual capacity is important and encouraged. However, that participation must not be done on Company time or at Company expense or on behalf of the Company without express written approval from the Legal Department.

### WHAT TO DO

**Political activity:** StandardAero encourages its Team Members to become involved in civic affairs and to participate in their political process. However, that involvement and participation must be on an individual basis, on the Team Member's own time,

and at their own expense. If you speak out on public issues, you must make it clear that you are speaking only for yourself and not for the Company. If you have any questions about what is permitted, you should seek help from the Legal Department.

**Political contributions:** Team Members are prohibited from making any political contributions for or on behalf of the Company. Team Members will not be reimbursed or compensated for any political expenditures made in their own, individual capacity.

## Government Business

StandardAero conducts business with national governments and government-owned enterprises. In the course of our work, we frequently interact with government agencies, officials and public international agencies. In every instance, StandardAero Team Members must apply the highest ethical standards and comply with applicable laws and regulations, including certain special requirements associated with government transactions. Team Members are required to comply with relevant Company policies and procedures, including but not limited to, the Anti-Corruption Policy and the Anti-Corruption Compliance Procedures, when transacting business with government entities, government-owned and controlled entities, and employees of these entities.

Hiring or recruiting current or former Government Officials or relatives of current or former Government Officials is subject to a variety of complex, frequently changing rules. Human Resources must be consulted prior to discussing employment with any current or former Government Official or relative of such an official.

### WHAT TO KNOW

Team Members must act with heightened diligence when engaging with government entities or officials. You must ensure that your actions are in compliance with relevant Company policies and procedures, including but not limited to, the Anti-Corruption Policy and the Anti-Corruption Compliance Procedures.

Team Members will comply with all government contracting regulations and requirements. We have a responsibility to know the law regarding the employment of current or former government personnel, and we will comply with those restrictions. We respect

the ethical standards with which government employees must comply, and we will honor those requirements as well as the StandardAero Code of Ethics.

## WHAT TO DO

**Abide by applicable laws** and regulations related to working with governments, particularly special requirements associated with government contracts and transactions.

**Be truthful and accurate** when dealing with government officials and agencies. If you are involved with preparing government bids or proposals, or negotiating resulting contracts, you must provide accurate, complete and current cost or pricing data. Information that would affect the price negotiations must be revealed as soon as it is known.

**Ensure that all aspects of transactions are transparent.** Assign costs to the appropriate project or overhead accounts. Describe all costs and payments in sufficient detail to allow all Team Members to understand – avoid vague descriptions at all costs!

**Be sure that costs** which are not allowed to be charged to government projects are kept separate. Most government contracts will not reimburse contractors for money spent on advertising, entertainment or other specified expenses.

**Adopt processes that ensure** reports, certifications, and proposals are current, accurate and complete and that contract requirements are adequately identified and communicated to the responsible parties.

**Do not make any unauthorized substitutions** for contracted goods and services or deviate from contractual requirements without approval from Legal and the written approval of the authorized Government Official.

**Require** anyone providing goods or services for StandardAero on a government project or contract (such as consultants, sales representatives, distributors or suppliers) to agree to comply with the intent of StandardAero's Code of Ethics.

**Do not ask for special procurement information** that is not available to all competitors. Government procurement must rely on fair and equal competition. It is important to avoid even the appearance of unfair advantage. It is better to pass up an opportunity to bid than risk being debarred from doing business with a government.

**Hiring former government employees:** There are complex laws that cover the terms for hiring former government employees, including military officers. For example, certain government employees must file a disqualification statement with the government before beginning employment negotiations with a company, and you should ask to see a copy of this statement before becoming interested in hiring such an individual. All employee search and hiring activities must be coordinated through your Human Resources office.

## WHAT TO WATCH OUT FOR

**Special requirements** that apply to transactions with governments, including anti-kickback laws that prohibit subcontractors from providing or offering any inducement in order to receive or keep work under government contracts.

**Incorrect or unauthorized cost-charging** on government contracts.

**Deviations from contract requirements** or unauthorized contract substitutions, such as failure to perform required tests and inspections.

**Requests for special treatment** or conditions when dealing with government entities or officials.

**Submission of inaccurate or incomplete** cost or pricing data when this data is required by the government.

**Violating government regulations** that establish gratuity restrictions, recruiting and hiring restrictions, or certification procedures.

**Negotiating for employment** with a Government Official or Government Official's family members while the official has the ability to influence decision making about contracts with the government.

## Fair Dealing

StandardAero is committed to vigorous, ethical and lawful business competition based on the merits of our services and products. Our Team Members must never use any illegal or unethical methods to compete or to acquire competitive information. All statements and representations made to prospective customers in proposals, bids or contract negotiations must be accurate and truthful. StandardAero will always be in full and complete compliance with antitrust laws and other statutes that prohibit restrictive trade agreements.

### WHAT TO KNOW

We will conduct all business competition in an ethical and legal manner. Team Members are strictly forbidden to use any illegal methods of obtaining information on competitors or competitive bids. We will forfeit any business that cannot be obtained honestly. Our business should be based on the value of the services we provide to a customer.

### WHAT TO DO

**Client, subcontractor, supplier and agent relations:** In all of your business dealings you must establish that you are fair and ethical with an understanding of the law. If you are entering an unfamiliar aspect of business, you must learn the applicable laws and regulations, and try to work out potential problems in advance. It is your duty to make consultants, subcontractors and suppliers aware of the Company's standards. Our agents, representatives and consultants have the same obligation under this Code as employees; suppliers and subcontractors are encouraged to support our efforts in this area.





# Competition Laws

## WHAT TO KNOW

**Antitrust laws:** Regulations to protect trade and commerce from unfair restraints are generally referred to as “antitrust” laws. Some of the activities prohibited include price fixing, monopolies, and price discriminations. Certain types of conduct between competitors are always illegal, and you must never, directly or indirectly:

- Agree on prices
- Agree on any other term of sale
- Allocate or divide up customers or markets
- Agree on production limits
- Agree on, or rig competing bids

**Other antitrust considerations:** Other conduct with competitors or suppliers may also be illegal under the antitrust laws. In the situations below, consult with your manager and the contracts department prior to proceeding:

- Requirements contracts
- Exclusive dealing arrangements
- Customer or supplier boycotts
- Tying or bundling together different products and services

## WHAT TO DO

**Comply** with all applicable competition laws and regulations as well as competition law decrees, orders and agreements with any competition regulator about how business will be conducted.

**Comply** with all applicable StandardAero policies and procedures.

**Do not** propose or enter into agreements with anyone (including competitors, agents, brokers or customers) regarding whether to submit a bid or the terms of a bid where there is an understanding that the bid is submitted for any purpose other than winning the business.

**Avoid contacts** of any kind with competitors that could create the appearance of improper agreements or understandings.

**Do not** propose or enter into agreements or understandings with customers that restrict the price or other terms at which the customer may resell or lease a product or service to a third party.

**Do not** propose or enter into agreements or understandings with suppliers that restrict the price or other terms at which StandardAero may resell or lease any product or service.

**Consult** with the Legal Department to help reduce the risks of noncompliance in the evaluation of any proposed merger, acquisition, joint venture or any other business arrangement that could raise competition law issues

## WHAT TO WATCH OUT FOR

**Exclusive arrangements** for the purchase or sale of products or services.

**Bundling** of goods and services.

**Agreements that restrict a customer's choices** in using or reselling a StandardAero product or service.

**Technology licensing** agreements that restrict the freedom of the licensee or licensor.

**Selective price discounting** to only certain customers.

**Distribution arrangements** with competitors.

**Agreements to add a StandardAero employee** to another entity's board of directors.

*There is a big account I think my business could land – but only if we partner with one of our competitors to go after it. Can we work together without violating the competition laws, or should I let this opportunity pass?*

Partnering with a competitor for a specific project may be permissible when the result is an improvement in the solution offered to the customer; for example, when both companies together can provide an offering that neither would be able to supply separately. Always seek legal advice before agreeing to work with a competitor on a joint proposal.

## In the StandardAero Community

*You're dispatched to repair part of an aircraft's hydraulic system. Unfortunately, the customer cannot completely shut down the system for repairs as planned since other flight controls are being tested. The customer asks you, as a favor, to do this work with no lock-out. It is unlikely the parts you are working on will move. You feel confident that you can do it with minimal risk. Can you do the customer this favor?*

Absolutely not. Both StandardAero policy and safe work practices require that remotely activated machinery be locked-out before work is commenced.

## Fair Employment Practices

### WHAT TO KNOW

Fair employment practices do more than keep StandardAero in compliance with applicable labor and employment laws. They contribute to a culture of respect. Beyond legal compliance, we strive to create an environment considerate of all Team Members wherever StandardAero business is being conducted.

### WHAT TO DO

**Base employment decisions** on job qualifications (e.g., education, prior experience) and merit. Merit includes an individual's skills, performance, values, leadership and other job-related criteria.

**Make all employment-related decisions and actions** without regard to a person's race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status or other characteristic protected by law.

**Provide a work environment** free of harassment and bullying.

**Respect the privacy rights** of employees by using, maintaining and transferring personal data in accordance with StandardAero's Privacy Policy. (While seeking to maintain employee privacy, StandardAero reserves the right to monitor use of Company property, including computers, email, phones, proprietary information, etc., in accordance with applicable law.)

**If a conflict arises** between the requirements of this policy and the laws, customs or practices of a particular area, consult with management and the Legal Department to determine the most appropriate course of action.

**Show respect:** All Team Members want and deserve a workplace where they feel respected, satisfied, and appreciated. We will not tolerate harassment or discrimination of any kind.

**Practice diversity:** As a global enterprise, we respect cultural diversity and recognize that the various countries in which we do business may have different legal provisions pertaining to the workplace. It is your responsibility to comply with the requirements specified by law at all Company locations.

**Comply as tenant or subcontractor:** Whenever StandardAero is co-located with a customer or prime contractor, our employees will respect and comply with the business practices, workplace requirements and ethical rules of our host, as well as this Code. In instances where this Code conflicts with the ethical rules of our host, contact the Chief Compliance Officer or Chief Legal Officer for guidance on how to proceed.

**Comply with all local child labor laws** and only hire employees who meet minimum legal age requirements according to applicable country laws and regulations.

**Prohibit the use** of any indentured, bonded or forced labor, slavery or servitude and comply with all applicable laws and regulations regarding the prevention of involuntary labor or human trafficking.

## WHAT TO WATCH OUT FOR

**A hostile work environment** (for example, telling jokes or displaying materials that ridicule or offend a member of a particular race or ethnic group.)

**Making unwelcome sexual advances** to another employee or person with whom you work.

**Violating a labor law.**

**Refusing to work**, or otherwise cooperate with, certain individuals because of their race, religion, sex, or other characteristic protected by law.

**Disclosing employment data** to a person who does not have the business need, authority or the subject's consent.

**Taking an adverse action** against a Team Member (e.g., firing) because the Team Member has raised a concern about a violation of policy or law. Remember, StandardAero strictly prohibits retaliation against anyone who raises a concern in good faith.



# Environment, Health and Safety

## WHAT TO KNOW

Protecting the environment and the health and safety of Team Members is the law – and StandardAero believes it's also the right thing to do. Through management leadership and Team Member commitment, StandardAero works to conduct its operations in a safe manner that minimizes environmental impact. This policy affects all Company activities – not just managing our waste and emissions, but everything we do – for example, selling products, driving a car on Company business, acquiring a new business or providing customer service.

## WHAT TO DO

**Comply** with all applicable environmental, health and safety (“EHS”) laws and regulations, and StandardAero EHS policies.

**Create and maintain** a safe working environment and prevent workplace injuries.

**Assess EHS legal** implications and risk to StandardAero's reputation before starting a new activity, venture or project, selling a new product, acquiring a new business or participating in a hazardous business.

**Eliminate unreasonable EHS risks** from StandardAero's facilities, products, services and activities.

**As practicable, reduce toxic and hazardous materials;** prevent pollution; and conserve, recover and recycle materials, water and energy.

**Continue to improve our EHS systems** and performance as an integral part of StandardAero's operational strategy.

**Present ideas** that support the goals of this policy to your manager or your facility's EHS contact.

**Promptly alert your manager** or EHS contact of unlawful or unsafe conditions.

## WHAT TO WATCH OUT FOR

**Unsafe activities and conditions**, such as:

- Failure to use personal protective equipment (including shoes, safety glasses, hearing protection, gloves, monitors, etc.);
- Unlabeled or unapproved chemicals;
- Exposed or unsafe wiring;
- Blocked fire or emergency exits;
- Unsafe driving, or failure to wear seat belts or follow StandardAero's driving policies;
- Working in high places without fall protection;
- Working beneath heavy, suspended loads, or improperly using cranes;
- Working on electrical or powered equipment without following safety (e.g., "Lock-out, tag-out") procedures;
- Working unsafely at a customer site;
- Potential exposure to serious infectious diseases;
- Disabling safety controls or guarding on equipment and machinery;
- Failure to comply with health, safety or environmental regulations and procedures;
- EHS complaints from Team Members, customers or neighbors;
- Unreported environmental, health or safety hazards or accidents;
- Failing to respond promptly to concerns about possible product/flight safety issues;
- Missed opportunities for reducing waste and toxic materials;
- Failing to follow StandardAero policies for the management, shipping, transportation, import/export and disposal of hazardous materials and chemicals;
- Risks and liability associated with new acquisitions as well as both new and existing products, processes, services and ventures that present increased legal liability and reputational risk; or
- Inadequate security procedures or practices that may present safety threats to a facility and/or Team Members.



# Security and Crisis Management

## WHAT TO KNOW

In an age of increasing terrorist threats, protecting the security of our people, workplaces, information and businesses is critical. It is critical to have rigorous and comprehensive security and crisis management plans. StandardAero's plans includes measures for preventing terrorist and other criminal acts covering our Team Members, facilities, information, information technology (IT) infrastructure, business continuity and crisis management. In addition, Team Members must take every precaution to avoid doing business with terrorists or those that support terrorist activity.



## WHAT TO DO

**Implement rigorous plans** to address the security of Team Members, facilities, information, IT assets and business continuity.

**Participate** in your facility's emergency planning and emergency drills.

**Comply with** the entry and exit rules at StandardAero facilities, including wearing the appropriate badge.

**Protect access** to StandardAero facilities from all but authorized personnel.

**Protect IT assets** from theft or misappropriation and immediately report any suspected incident of theft for investigation.

**Create and maintain** a safe working environment – this includes identifying and reporting indicators of workplace violence.

**Comply with** global immigration rules when traveling internationally, and ensure that employees or visitors who work for you or are closely associated with StandardAero also comply.

**Comply with** all StandardAero international travel policies. Obtain appropriate pre-clearances to designated countries.

**Conduct** appropriate background checks on new hires and contractors, wherever allowed by law.

**Ensure proper business** continuity plans are prepared for an emergency.

**Screen** all customers, suppliers, agents and dealers against appropriate terrorist watch lists.

**Report any apparent** security lapses to your manager or your facility's security officer

## WHAT TO WATCH OUT FOR

**Individuals at StandardAero facilities** not wearing appropriate badges.

**Unsecure IT assets**, such as laptops, servers, etc.

**Inadequate protection** of hazardous materials.

**Unsecure areas of a facility** where only authorized personnel are allowed to enter.

**Security complaints** from Team Members, customers or neighbors.

**Unauthorized entry** to a facility.

**Doing business** with a customer, supplier or any Third Party without sufficient screening.

## Protecting StandardAero Assets

Team Members should protect StandardAero's assets and ensure their efficient use for legitimate business purposes only and not for any personal benefit or the personal benefit of anyone else. Theft, carelessness and waste have a direct impact on StandardAero's financial performance. The use of StandardAero funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited.

Team Members should be aware that StandardAero property includes all data and communications transmitted or received to or by, or contained in, StandardAero's electronic or telephonic systems. StandardAero property also includes all written communications.

## Intellectual Property

### WHAT TO KNOW

StandardAero's intellectual property is one of its most valuable assets. All Team Members must work to safeguard our patents, trademarks, copyrights, trade secrets and other proprietary information. At the same time, it is critical that we respect the valid intellectual property rights of others. Unauthorized use of others' intellectual property can expose the Company and even individual StandardAero Team Members to civil law suits and damages, including significant fines and criminal penalties. A key to protecting our intellectual property and, at the same time, guarding against these risks, is the timely and reasonable review of new StandardAero products, services, processes and software, for possible inventions and trade secrets and infringement of the intellectual property rights of others.

## WHAT TO DO

**Identify and protect** StandardAero intellectual property.

**Follow the requirements** of StandardAero's procedures in handling any unsolicited ideas from outsiders as well as any employee ideas.

**Respect valid patents**, copyrighted materials and other protected intellectual property of others.

**Consult** with the Legal Department concerning necessary licenses or approvals to use protected intellectual property of others such as patents, trademarks or proprietary information (i.e., information that is in confidence and not publicly known or generally available).

**Consult** with Company legal counsel before:

- Soliciting, accepting or using proprietary information of others
- Disclosing StandardAero proprietary information
- Permitting others to use StandardAero intellectual property.

**Understand your responsibilities** to the Company regarding new inventions, ideas that you may develop as a StandardAero Team Member and the Company's information.

**Comply** with the guidelines for use of StandardAero trademarks and trade names.

## WHAT TO WATCH OUT FOR

**Accepting proprietary information** belonging to others, without first consulting the Legal Department.

**Discussing StandardAero proprietary information** with customers or suppliers.

**Using another company** to develop new products or software without a written agreement in place covering ownership and other rights in the developed intellectual property.

**Passing on**, for technical or management review, an outsider's suggestion for a new product, product feature, service or name, without following StandardAero procedure.

**Introducing, or providing information** about, a new product or service before patent applications have been filed or a decision has been made not to file an application.

**Introducing a new product** or service, or new product or service name, before checking for patent or trademark infringement.

**Threatening** anyone suspected of infringing any StandardAero intellectual property without first consulting with Company legal counsel.

**Employing a new person**, especially a person who previously worked for a competitor, without putting in place safeguards to prevent the person from inadvertently disclosing or using the proprietary information of the previous employer.



# Confidential and Sensitive Information

## WHAT TO KNOW

Team Members are required to protect the Company and act responsibly with the sensitive information of competitors, customers and other stakeholders. Information created by StandardAero in the normal course of business is considered company confidential and proprietary, and may not be used for personal purposes or for the benefit of persons outside the Company. Information entrusted to us by suppliers and customers is also confidential and may not be disclosed outside the Company. The obligation to preserve confidential information continues even after employment ends.

## WHAT TO DO

**Private and proprietary information:** If you have access to technical, financial or commercial information that is sensitive or belongs to the Company, its clients or suppliers, you are responsible for safeguarding it. You must ensure that only those people with a legitimate need to know have access to trade secrets, cost data, marketing plans, computer programs, new development projects and other business information.

**Personal information:** If you have access to Team Member data, such as personnel files or other personal information, it is your duty to protect Team Member privacy in accordance with Company policies and all applicable privacy regulations.

**Classified information:** You are required by law to safeguard any government classified information with which you may work. If you are required to work with classified materials, your local security officer will instruct you in the procedures you must follow to safeguard these materials. The responsibility to protect information, both private and classified, continues even if you leave the Company, and you must account for and return all documents upon termination of employment.

## Public Communications and Regulation FD

StandardAero places a high value on its credibility and reputation in the community. What is written or said about StandardAero in the news media and investment community directly impacts our reputation, positively or negatively. Our policy is to provide timely, accurate and complete information in response to public requests (from media, analysts, etc.), consistent with our obligations to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data. Please contact the Company's Chief Legal Officer with any questions you may have about disclosure matters.

In connection with its public communications, StandardAero is required to comply with a rule under the federal securities laws referred to as Regulation FD (which stands for "fair disclosure"). Regulation FD provides that, when we disclose material non-public information about StandardAero to securities market professionals or stockholders (where it is reasonably foreseeable that the stockholders will trade on the information), we must also disclose the information to the public. "Securities market professionals" generally include analysts, institutional investors and other investment advisors.



## Corporate Opportunities

Team Members have an obligation to advance StandardAero's interests when the opportunity to do so arises. If you discover or are presented with a business opportunity through the use of corporate property or information or because of your position with StandardAero, you should first present the business opportunity to StandardAero before pursuing the opportunity in your individual capacity. No Team Member may use corporate property, information or his or her position with StandardAero for personal gain or compete with StandardAero while employed by us.

You should disclose to your supervisor the terms and conditions of each business opportunity covered by this Code of Ethics that you wish to pursue. Your supervisor will contact the Chief Legal Officer or the Chief Compliance Officer, and the appropriate management personnel to determine whether StandardAero wishes to pursue the business opportunity. If StandardAero waives its right to pursue the business opportunity, you may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code of Ethics.

## Information Recording and Reporting

StandardAero is committed to accuracy and reliability in the preparation, preservation and maintenance of all business records. Transactions between the Company and outside individuals and organizations must be promptly and accurately entered in our books in accordance with generally accepted accounting practices and principles. It is a crime to knowingly present a false claim to a government, and a false claim is fraud in the private sector. Ensure all documents that you prepare are correct. You must also assist auditors who are checking our records and not block their efforts.

As a public company, we are subject to various securities laws, regulations and reporting obligations. Both federal law and our policies require the disclosure of accurate and complete information regarding StandardAero's business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage StandardAero and result in legal liability.

Our principal financial officers and other employees working in the finance department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. These employees must understand and strictly comply with generally accepted accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

### WHAT TO KNOW

All Company records, reports, pricing data, invoices and other business documents must be prepared accurately and honestly. We will make fair, accurate, timely and understandable disclosures in public communications. Records must be retained in compliance with Company record-keeping policies and procedures.

## WHAT TO DO

**Accurate records:** All business records, financial statements, and tax filings must be maintained in reasonable detail, must accurately reflect the transaction that occurred, and must conform both to applicable legal requirements and to the StandardAero system of internal controls. In addition, you must ensure electronic records of hardcopy documents reflect the contents and appearance at the time of the transaction (e.g., scan in documents with any handwritten notes or other marks).

**Business accounting:** If you are responsible for preparing information on a project, group of projects, or for your activity as a whole, be sure that what you provide represents an accurate picture of the way things are going or are likely to go. The Company must be able to rely on your information to plan for its future needs, and arrangements with financial institutions are founded on the accuracy of this information.

**Time and attendance reports:** You are personally responsible for accurately reporting the time you spend at work, on vacation, on holiday, or on other paid leave. In addition, managers are responsible for confirming, or in some cases, assigning all time charges to the correct project or overhead account without regard for the remaining available budget. Accuracy and honesty in time and attendance reporting are absolutely essential.

**Test/training records:** If you are responsible for conducting tests, you are responsible for accurately recording the test results. Both the Company and our customers must be able to rely on the truthfulness and accuracy of test results and any follow-up corrective action.

**Public disclosures:** We must ensure that public communication by the Company is fair, accurate, timely, and understandable. This obligation applies to all Team Members with any responsibility for preparing, drafting, reviewing, signing or certifying the information contained in those reports. Communications must be open, yet not compromise proprietary information or violate confidentiality.

**Accounts payable and receivable:** If you are responsible for preparing invoices or for providing information to people who do, you must be sure that the invoice correctly reflects the product or service sold and the terms of the sale. If you are responsible for

making payments to consultants, subcontractors, or suppliers, you must make certain that the product or service received is exactly what the purchase agreement says it is. Both of these transactions must be handled so that there is no opportunity to hide kickbacks, bribes or other improper payments or receipts.

**Internal and External Audits:** If you receive a request from one of StandardAero's internal and independent auditors, you must always cooperate and respond fully and truthfully. Do not ever hinder or block their efforts, provide them with false information or documentation, or withhold information from them.

# Conflicts of Interest

## WHAT TO KNOW

Team Members must act in the best interests of StandardAero. You must refrain from engaging in any activity or having a personal interest that presents a “conflict of interest” and should seek to avoid even the appearance of a conflict of interest. A conflict of interest occurs when your personal interest interferes with the interests of StandardAero. A conflict of interest can arise whenever you, as an employee, officer or director, take action or have an interest that prevents you from performing your duties and responsibilities honestly, objectively and effectively.

Identifying potential conflicts of interest may not always be clear-cut. The following situations might reasonably be expected to give rise to a conflict of interest and should be identified to, and addressed by, the Chief Legal Officer, the Chief Compliance Officer or the Board of Directors, where appropriate:

- Outside Employment. A Team Member being employed by, serving as a director of, or providing any services to a company that the individual knows or suspects is a customer (including advisory clients), supplier or competitor of the Company (other than services to be provided as part of an employee’s job responsibilities for StandardAero). Similarly, an actual or apparent conflict of interest may arise if an employee serves as a personal fiduciary for another person, particularly if that relationship developed in the context of that employee’s role with StandardAero.
- Improper Personal Benefits. A Team Member obtaining any material (as to him or her) personal benefits or favors because of his or her position with StandardAero.
- Financial Interests. A Team Member having a “material interest” (ownership or otherwise) in any company that the employee knows or suspects is a material customer, supplier or competitor of StandardAero and using his or her position to influence a transaction with such company. Whether a Team Member has a “material interest” will be

determined by the Board of Directors in light of all of the circumstances, including consideration of the relationship of the employee to the customer, supplier or competitor, the relationship of the employee to the specific transaction and the importance of the interest to the employee having the interest.

- Loans or Other Financial Transactions. A Team Member obtaining loans or guarantees of personal obligations from, or entering into any other personal financial transaction with, any company or individual that the employee or director knows or suspects is a material customer, supplier or competitor of StandardAero. This guideline does not prohibit arms-length transactions with banks, brokerage firms or other financial institutions.
- Service on Boards and Committees. A Team Member serving on a board of directors or trustees or on a committee of any entity (whether profit or not-for-profit) whose interests reasonably would be expected to conflict with those of StandardAero.
- Actions of Family Members. The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence an employee's or director's objectivity in making decisions on behalf of StandardAero. For purposes of this Code of Ethics, "family members" include your spouse or life-partner, brothers, sisters, parents, in-laws and children whether such relationships are by blood or adoption.

If you are uncertain whether a particular company or individual is a material customer, supplier or competitor, please contact the Chief Legal Officer or the Chief Compliance Officer for assistance.

StandardAero requires that Team Members disclose any situation that reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a situation that could give rise to a conflict of interest, or something that others could reasonably perceive as a conflict of interest, you must report it in writing to your supervisor or the General Counsel, or if you are a director or executive officer, to the Board of Directors. The Chief Legal Officer or the Board of Directors, as applicable, will work with you to determine whether you have a conflict of interest and, if so, how best to address it. All transactions that would give rise

to a conflict of interest involving a director, executive officer or principal financial officer must be approved by the Board of Directors, and any such approval will not be considered a waiver of this Code of Ethics.

## **WHAT TO DO**

**Disclose** activities, financial interests or relationships that may either present a conflict or the appearance of one.

**Use good judgment** in all personal and business dealings outside your StandardAero job.

**Avoid actions or relationships** that may cause potential conflicts or create the appearance of a conflict with your job or StandardAero's interests.

**Do not misuse** or use for personal gain StandardAero resources, intellectual property, time or facilities – this includes office equipment, email and computer applications.

**Do not personally accept** any opportunities in which StandardAero could have an interest, that you discover as a result of your StandardAero position, or your use of StandardAero information or property.

**Get approvals** before accepting officer or director positions with an outside business while you are a StandardAero employee.

## WHAT TO WATCH OUT FOR

**Financial interests** in a company where you could personally affect StandardAero's business with that company (for example, a customer, supplier or investment).

**Part-time jobs** which you perform using StandardAero hours, equipment or materials.

**Gifts** (other than Gifts of nominal value containing logos or trademarks) from suppliers, customers or competitors, particularly if you're making decisions (on StandardAero's behalf) that involve them.

**Personal discounts** or other benefits from suppliers, service providers or customers that the public or your StandardAero peers do not receive.

**Directing business** to suppliers when you know they are owned or managed by family members or close friends.

**Misusing StandardAero resources**, your position or influence to promote or assist an outside activity.

**Hiring, promoting or directly supervising** a family member or close friend.

**Personal relationships** that may conflict with your StandardAero responsibilities or compromise Company interests.



# Insider Trading

## WHAT TO KNOW

In the course of your job, you may learn of material information about StandardAero or other companies before it is made public. You may simply overhear a hallway conversation or come across a memo left at a copy machine. Using this information for your financial or other personal benefit or conveying this information to others constitutes a violation of this policy and may even violate the law. This includes buying or selling the securities of any company about which you have material non-public information and giving this “inside information” to anyone else who might base financial trades on the information you’ve shared.

## WHAT TO DO

**Do not buy or sell** the securities of any company, either directly or through family members or other persons or entities, while you are aware of inside information about the company. (This is known as “insider trading.”)

**Do not recommend or suggest** that anyone else buy or sell the securities of any company while you have inside information about the company.

**Maintain the confidentiality** of Company information and do not convey information to anyone outside the Company unless it is necessary for the Company’s business activities.

**If the nature of your job** and your position in the Company subject you to additional requirements relating to buying and selling securities (such as pre-clearing personal trades) learn and follow all of those requirements.

**If questions arise**, consult the Legal Department before trading in the security or disclosing Company information.

## WHAT TO WATCH OUT FOR

**Non-public information** which, if disclosed, would reasonably be expected to affect the price of a security or would influence your decision to buy, sell or hold a security, such as an earnings announcement or a prospective acquisition announcement

**Buying or selling a security** because you hear or learn of information at work that you think will make the price go up or down once it's publicly announced

**Engaging in trading activity** around the time of a significant company announcement

**Discussing StandardAero business** with family and friends

**Talking about what you're working on** or where you're going on company business or who visited the office

*I was chatting with my brother and mentioned that I had an upcoming business trip to close the deal for StandardAero to acquire Company X. Could this create a problem?*

Yes, if Company X is a public company and the possible acquisition of Company X has not been publicly announced. If your brother trades Company X stock based on your tip, both of you could be charged with insider trading.



### Code of Ethics Certification

I have complied and pledge to continue to comply with the letter and spirit of the StandardAero Code of Ethics. Let my signature below stand as certification of that pledge.

My Signature: \_\_\_\_\_





**StandardAero**

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