



GE Aviation’s Commitment to Compliance

GE Aviation is a world-leading provider of commercial, military and business and general aviation jet and turboprop engines and components as well as avionics, electrical power and mechanical systems for aircraft. GE Aviation is a business unit of General Electric Company (GE), a publicly traded company operating worldwide.

GE is committed to integrity and maintaining a world-class compliance culture in every GE business, in all business dealings, everywhere we operate. At the heart of GE’s Integrity and Compliance Program is *The Spirit & The Letter*, consisting of our Code of Conduct and a summary of global GE Compliance policies that cover our integrity commitments on critical subjects and risk areas. Anyone who works for or represents GE must follow *The Spirit & The Letter*. To keep GE’s heartbeat of integrity strong in a complex world, all GE employees and representatives are required to be knowledgeable about *The Spirit & The Letter* and other policies and procedures that impact their role. They must be aware of integrity and compliance in their daily activities and decisions. And they must commit to upholding the highest of ethical standards and having the confidence to raise concerns or ask questions to ensure we all do the right thing in the right way.

GE Aviation supports the mission of Transparency International (TI), including the work of TI Defence & Security, to combat corruption in defense and security ministries, in armed forces, and in defense companies through transparency in compliance. To that end, GE Aviation is publishing the following public disclosure of information responsive to TI’s Defence Companies Anti-corruption Index (DCI) 2019 Questionnaire. Hyperlinks to public websites are provided where possible. Where GE Aviation considers a full policy, procedure, or other business information to be proprietary or confidential, we make the statements below to confirm their existence and our commitment to them, and we have summarized relevant information where applicable below.

1. Leadership and Organizational Culture	
1.1 Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?	Yes. GE Aviation’s leadership is committed to the highest ethical standards in all aspects of our business and throughout the world. GE’s Improper Payments Policy, which is a key element of <i>The Spirit & The Letter</i> , prohibits bribery in all business dealings, in every country around the world, with both governments and the private sector. GE’s commitment to anti-bribery and corruption is integral to our Integrity and Compliance Program, and reference to this commitment may be found in many of GE’s foundational documents, which are publicly-facing statements of the company that reflect the views of its leadership. GE’s policy

	<p>against improper payments was authorized and is endorsed by the Board of Directors, the Chief Executive Officer and all Company leadership, and represents a core belief in how we do business. Indeed, the Board of Directors is identified publicly as a path for employees to share a concern, visibly demonstrating its expectations for employees' compliance with <i>The Spirit & The Letter</i>. All GE employees and representatives are required to have a basic understanding of <i>The Spirit & The Letter</i> and learn the details of policies relevant to their responsibilities, including the Improper Payments Policy, be aware of integrity and compliance in their daily activities and decisions, and be committed to upholding the highest of ethical standards and having the confidence to raise concerns or ask questions to ensure we all do the right thing in the right way.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/integrity https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p>
<p>1.2 Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories: a) All employees, including staff and leadership of subsidiaries and other controlled entities; b) All board members, including non-executive directors.</p>	<p>Yes. GE's Improper Payments Policy, and other Compliance policies that prohibit bribery, explicitly apply to and must be followed by anyone who works for or represents GE, including GE directors, officers, leaders and employees, employees of subsidiaries and entities which GE controls, and third parties such as consultants, agents, sales representatives, distributors and independent contractors. GE Aviation implements the Improper Payments Policy through various proprietary procedures, including the GE Improper Payments Implementing Procedures, GE Onboarding Due Diligence Policy, GE Aviation Business Courtesy Procedure, GE Aviation Intermediary Procedure, GE Controllership Policy, GE Travel & Living Policy, GE Political Contributions Policy, GE Lobbying Disclosure Policy, and GE Aviation Open Reporting and Investigation Process. To keep GE's heartbeat of integrity strong in a complex world, all GE employees and representatives are required to have a basic understanding of <i>The Spirit & The Letter</i> and learn the details of policies relevant to their responsibilities, including the Improper Payments Policy, be aware of integrity and compliance in their daily activities and decisions, and be committed to upholding the highest of ethical standards and having the confidence to raise concerns or ask questions to ensure we all do the right thing in the right way.</p>

	<p><i>Further reading:</i> https://www.ge.com/sustainability/integrity https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf https://www.ge.com/sustainability/reports-hub#integrity https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption_Factsheet_R5.pdf</p>
<p>1.3 Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?</p>	<p>Yes. GE’s Board of Directors has oversight for risk management at GE, including all elements of GE’s Integrity and Compliance Program such as anti-bribery and corruption. The Board’s Audit Committee assists the Board in its oversight of the integrity of the financial statements of the company, of the company’s compliance with legal and regulatory requirements, of the independence and qualifications of the independent auditor and of the performance of the company’s internal audit function and independent auditors. The Audit Committee is tasked to review and investigate any matters pertaining to the integrity of management or adherence to standards of business conduct as required in company policies, including regular review of compliance processes and programs in general and the corporate ombudsman process in particular. The Audit Committee’s process builds upon management’s risk assessment and mitigation processes, which include reviews of compliance under <i>The Spirit & The Letter</i>, laws and regulations, the company’s Integrity and Compliance Program, financial reporting and controllership.</p> <p><i>Further reading:</i> https://www.ge.com/investor-relations/governance https://www.ge.com/investor-relations/sites/default/files/AC_charter.pdf https://www.ge.com/sites/default/files/AC_key_practices.pdf</p>

	<p>https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf</p>
<p>1.4 Is responsibility for implementing and managing the company’s anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company’s programme?</p>	<p>Yes. GE’s Senior Vice President, General Counsel & Secretary (“GC”) is a member of GE’s Board of Directors, reports directly to GE’s CEO, and leads the company’s global compliance and ethics organizations which include anti-bribery and corruption programs. The GC is a senior executive with ultimate responsibility for implementing and managing the company’s anti-bribery and corruption program. The GC also meets at least annually with the Audit Committee to review and discuss compliance and legal risks. The GC is assisted in these efforts by the GE Chief Compliance Officer.</p> <p><i>Further reading:</i></p> <p>https://www.ge.com/about-us/leadership/executives</p> <p>https://www.ge.com/investor-relations/sites/default/files/AC_charter.pdf</p> <p>https://www.ge.com/sites/default/files/AC_key_practices.pdf</p> <p>https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf</p>
<p>2. Internal Controls</p>	
<p>2.1 Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?</p>	<p>Yes. The design and implementation of GE’s Corporate anti-bribery and corruption program, and the implementation of that program by GE Aviation, is tailored to the particularized risk of corruption and bribery the company faces. GE Aviation maintains strong controls aimed at preventing, detecting, and responding to any bribery or corruption. These controls include formal bribery and corruption risk assessment procedures, rigorous processes for appointing and managing third parties acting in business dealings on behalf of GE Aviation, oversight of provision or receipt of gifts, political contributions and other items of value, carefully implemented policies and procedures governing the expenditure of GE resources on business travel and entertainment, controls on maintaining accurate books and records, audits to ensure implementation of the above, and a robust Ombuds program to ensure multiple channels for</p>

	<p>open reporting of alleged bribery or corruption and independent investigations of the same. GE Aviation implements the Improper Payments Policy through various proprietary procedures, including the GE Improper Payments Implementing Procedures, GE Onboarding Due Diligence Policy, GE Aviation Business Courtesy Procedure, GE Aviation Intermediary Procedure, GE Controllership Policy, GE Travel & Living Policy, GE Political Contributions Policy, GE Lobbying Disclosure Policy, and GE Aviation Open Reporting and Investigation Process.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/integrity</p> <p>https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p> <p>https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf</p> <p>https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf</p> <p>https://www.ge.com/sustainability/reports-hub#integrity</p>
<p>Does the company review its anti-bribery and corruption risk assessment and update it when gaps and issues are identified?</p>	<p>Yes. GE Aviation reviews anti-bribery and corruption risk assessments at least annually and updates them when gaps are identified.</p> <p><i>Further reading:</i> https://www.ge.com/investor-relations/sites/default/files/AC_charter.pdf</p> <p>https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf</p>
<p>2.2 Is the company’s anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?</p>	<p>Yes. GE Aviation’s anti-bribery and corruption programs are subject to regular internal and external audits to ensure they are consistent with best practices and business risks facing the company. The Audit Committee is tasked to review and investigate any matters pertaining to the integrity of management or adherence to standards of business conduct as required in Company policies, including an annual review of the company’s operations and regular review of compliance processes and programs in general and the corporate ombudsman process in particular. At least once a year, the Audit Committee will review and discuss with the</p>

	<p>General Counsel regulatory, compliance and litigation risks facing the company, including the anti-bribery and corruption program. The Audit Committee’s process builds upon management’s risk assessment and mitigation processes, which include reviews of compliance under <i>The Spirit & The Letter</i>, laws and regulations, the company’s Integrity and Compliance Program, financial reporting and controllership. Management may also order audits of particular risk areas, including anti-bribery and corruption, as appropriate to respond to concerns, gaps, or emerging risks. Company policies and procedures are regularly updated to mitigate any gaps identified during audits.</p> <p><i>Further reading:</i> https://www.ge.com/investor-relations/sites/default/files/AC_charter.pdf https://www.ge.com/sites/default/files/AC_key_practices.pdf</p>
<p>2.3 Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?</p>	<p>Yes. The GE Board of Directors has established a robust Ombuds program for receiving and handling complaints or concerns about the company’s conduct, including bribery and corruption allegations or incidents. GE’s Ombuds program provides multiple whistleblowing and reporting channels (discussed below), and GE tracks, investigates and responds to complaints or concerns raised through such channels using a proprietary digital tool. GE examines integrity concerns, including bribery and corruption allegations or incidents, fairly, promptly, independently, and objectively. GE Aviation implements the Corporate Ombuds and investigative processes through the proprietary GE Aviation Open Reporting and Investigation Process.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/integrity https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf https://www.ge.com/sites/default/files/AC_key_practices.pdf</p>
<p>2.4 Does the company have appropriate arrangements in place to ensure the quality of investigations?</p>	<p>Yes. GE is committed to examining every integrity concern, including bribery and corruption allegations or incidents, fairly, promptly, independently, and objectively. GE Aviation implements the Corporate Ombuds and investigative</p>

	<p>processes through the proprietary GE Aviation Open Reporting and Investigation Process. During the investigation process, GE forms an objective investigation team, determines the facts through interviews and/or the review of documents, recommends corrective actions if necessary, and provides the person who raised the original concern (if that person is known) with feedback on the outcome. Staff tasked with conducting investigations are qualified and trained to perform the function, and any complaints about the handling of concerns and investigations are raised to an appropriate higher level for review.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/integrity https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf https://www.ge.com/sites/default/files/AC_key_practices.pdf</p>
<p>2.5 Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?</p>	<p>As part of GE’s Corporate Ombuds and investigative process, the Audit Committee has established procedures for the receipt, retention, and treatment of complaints received by the company regarding accounting, internal accounting controls or auditing matters, and the confidential, anonymous submission by GE employees of concerns regarding questionable accounting or auditing matters. All such complaints that could materially affect financial reporting or controls will be sent directly to the chair of the Audit Committee. All such complaints will be tracked on a separate board of directors' Ombuds docket, but handled by the company's Ombuds, finance and legal staffs in the normal manner, except as the Audit Committee may request. The status of such complaints will be reported to the chair of the Audit Committee and if he or she so directs, to the committee or the full board. The Audit Committee chair may request special treatment, including the retention of outside counsel or other advisors, for any complaint addressed to him or her. GE’s integrity manual prohibits any employee from retaliating or taking any adverse action against anyone for raising or helping to resolve an integrity concern.</p> <p>Likewise, GE Aviation procedures assure an appropriate senior individual is responsible for ensuring that the</p>

	<p>disclosure of criminal offenses to relevant authorities is evaluated and acted upon appropriately. GE Aviation has a policy relating to the handling of integrity concerns, which would include concerns that may have involved potentially criminal conduct. That policy and concomitant process for execution may result in GE reporting findings and results of its investigations to government agencies, when appropriate, with the approval of the GE Aviation Vice President & General Counsel, who is a senior member of GE Aviation’s executive leadership team. This may include, but is not limited to, timely disclosure to, and full cooperation with, any relevant government agency.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/integrity</p> <p>https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p> <p>https://www.ge.com/sites/default/files/AC_key_practices.pdf</p>
<p>2.6 Does the company publish high-level results from incident investigations and disciplinary actions against its employees?</p>	<p>Yes. GE publishes high-level results from incident investigations, including for improper payments (bribery or corruption-related investigations), and disciplinary actions against employees at all levels.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/sites/default/files/GE_ESG_KPIs_RY2017_r13_Aug2018.pdf</p> <p>https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf</p>
<p>3. Support to Employees</p>	
<p>3.1 Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages?</p>	<p>Yes. GE Aviation provides training to employees on <i>The Spirit & The Letter</i>, including specific training on GE’s Improper Payments Policy and anti-bribery and corruption programs. All employees, across all divisions and geographies, are required to receive live and/or electronic training during onboarding, on <i>The Spirit & The Letter</i>, site-specific codes of conduct, and/or collectively-bargained codes of conduct, in their appropriate language. In addition, the GE Aviation Chief Executive Officer re-emphasizes <i>The Spirit & The Letter</i> to all employees at least annually, the GE Aviation Chief Compliance Officer addresses employees at every quarterly leadership meeting, and all exempt employees must</p>

	<p>acknowledge at least annually that they have read and continue to understand <i>The Spirit & The Letter</i>.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p>
<p>3.2 Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees: a) Employees in high risk positions, b) Middle management, c) Board members.</p>	<p>Yes. GE Aviation provides tailored anti-bribery and corruption training to employees in various roles as determined by risk. All new salaried employees, which includes all middle management and employees in high risk positions, receive targeted online training on <i>The Spirit & The Letter</i>, including specific training on GE’s Improper Payments Policy and anti-bribery and corruption programs. In addition, business compliance leaders assign advanced online Improper Payments training for specific employees based on job function. Certain employees in heightened-risk roles additionally receive in-person training focused on specific functions. Board members too receive tailored trainings. In addition, the GE Aviation Chief Executive Officer re-emphasizes <i>The Spirit & The Letter</i> to all employees at least annually, the GE Aviation Chief Compliance Officer addresses employees at every quarterly leadership meeting, and all exempt employees (which would include roles considered middle management) must acknowledge at least annually that they have read and continue to understand <i>The Spirit & The Letter</i>. Further, the Audit Committee is tasked to review and investigate any matters pertaining to the integrity of management or adherence to standards of business conduct as required in Company policies, including an annual review of the company’s operations and regular review of compliance processes and programs in general and the corporate ombudsman process in particular. At least once a year, the Audit Committee will review and discuss with the General Counsel regulatory, compliance and litigation risks facing the company, including the anti-bribery and corruption program.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p> <p>https://www.ge.com/investor-relations/sites/default/files/AC_charter.pdf</p>

<p>3.3 Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?</p>	<p>Yes. GE Aviation reviews compliance risks comprehensively, including those related to improper payments, through an annual risk assessment process. By that process, a risk focal reviews information from across the compliance program related to the risk area, including information about concerns reported in the space, confirmation rates, and trends. The focal, who is an attorney who is dedicated exclusively to this area within the Compliance function, evaluates and recommends mitigation accordingly, which may include, among other things, training and communication in this area. Through this process, GE Aviation's anti-bribery and corruption risk assessments are updated at least annually and its anti-corruption and training programs are likewise updated when gaps are identified. GE Aviation also conducts an annual survey of exempt employees about its Integrity and Compliance Program, which includes anti-bribery and corruption, to measure and review its effectiveness. This annual process's consideration of compliance-related inquiries and concerns, their outcome, and other factors in this space, as well as its dedicated staff working in this risk area, allow GE Aviation to continuously monitor and measure the effectiveness and implementation rates of its formal anti-bribery and corruption training programs.</p> <p><i>Further reading:</i> https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf</p>
<p>3.4 Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?</p>	<p>Yes. To the extent GE Aviation employees receive performance-based pay as part of their overall compensation, it is generally based upon overall business or sub-business performance metrics and individual contributions to pre-determined criteria such as performance appraisals and workplace conduct and conformance with <i>The Spirit & The Letter</i> which include a commitment to ethical conduct. While awards are based on financial metrics, they are also subject to an additional qualitative assessment, focused on risk management and the level of compliance, and the company reserves the right to adjust award amounts and bonus in its discretion based on these and other factors. Payment of per deal sales incentives is uncommon, and in instances where a portion of compensation is tied to a particular deal, the incentives are designed in a way that would discourage corrupt practices. Further, bribery and corruption are strictly prohibited, actively monitored, and are not tolerated.</p>

<p>3.5 Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?</p>	<p>Yes. GE Aviation is committed to protect and support its employees who refuse to act unethically, even where those actions result in a loss of business or other disadvantage to the company. <i>The Spirit & The Letter</i> makes clear that GE employees are expected to be the voice of integrity and promptly report any concerns about compliance with law, GE policy or the Code of Conduct. GE Aviation regularly highlights “Compliance Champions” who choose to be the voice of integrity.</p> <p>GE Aviation’s compliance function also conducts an annual anonymous compliance culture survey among exempt employees to receive feedback on their feelings on various dimensions of the program, including their awareness of ethical issues in their area and ability to report concerns. Data concerning the volume and types of concerns raised through the ombuds program are also metrics that the Compliance function considers in assessing employee confidence in its commitment to open reporting and ethical conduct. GE likewise provides multiple whistleblowing and advice channels for use by all, including GE employees and external parties, and they allow for confidential and anonymous reporting. <i>The Spirit & The Letter</i> summarizes these Open Reporting options and explains that personnel may raise an integrity concern. Confidentiality is respected, and reporting individuals may choose to remain anonymous. GE Aviation regards its employees’ active use of the systems for reporting concerns--most of which in recent years are not reported anonymously--to be an indicator of their confidence in the system and GE Aviation’s assurances to those who raise concerns. In that regard, GE Aviation regularly tracks both the volume of concerns that are raised and the proportion of them that are not raised anonymously. GE Aviation does so because it recognizes that these metrics may be indicative of the program’s health in its employees’ eyes.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p>
<p>3.6 Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?</p>	<p>Yes. GE has a clear policy of non-retaliation against employees who raise integrity concerns, including whistleblowers and employees who report bribery and corruption incidents. <i>The Spirit & The Letter</i> makes clear that confidentiality is respected, and employees may choose</p>

	<p>to remain anonymous when reporting integrity concerns. When an employee chooses to be identified, the employee’s identity and information is only shared with relevant individuals involved in the Ombuds or investigative process on a “need-to-know” basis. Any retaliation—whether direct or indirect—against employees who raise a concern is strictly prohibited and grounds for discipline up to and including dismissal.</p> <p>GE Aviation’s compliance function also conducts an annual anonymous compliance culture survey among exempt employees to receive feedback on their feelings on various dimensions of the program, including their awareness of ethical issues in their area and ability to report concerns. Data concerning the volume and types of concerns raised through the ombuds program are also metrics that the Compliance function considers in assessing employee confidence in its commitment to open reporting and ethical conduct. GE likewise provides multiple whistleblowing and advice channels for use by all, including GE employees and external parties, and they allow for confidential and anonymous reporting. <i>The Spirit & The Letter</i> summarizes these Open Reporting options and explains that personnel may raise an integrity concern. Confidentiality is respected, and reporting individuals may choose to remain anonymous. GE Aviation regards its employees’ active use of the systems for reporting concerns--most of which in recent years are not reported anonymously--to be an indicator of their confidence in the system and GE Aviation’s assurances to those who raise concerns. In that regard, GE Aviation regularly tracks both the volume of concerns that are raised and the proportion of them that are not raised anonymously. GE Aviation does so because it recognizes that these metrics may be indicative of the program’s health in its employees’ eyes.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p>
<p>3.7 Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?</p>	<p>Yes. GE provides multiple whistleblowing and advice channels for use by all, including GE employees and external parties, and they allow for confidential and anonymous reporting. United States Government agency fraud hotline posters or Department of Homeland Security (DHS) fraud hotline posters are prominently displayed in common areas</p>

	<p>of GE Aviation facilities when contractually required. The posters are also available on the GE Aviation Compliance and Integrity website via the intranet. <i>The Spirit & The Letter</i> summarizes the GE Open Reporting options and explains that personnel may raise an integrity concern through several channels, including their manager, their human resources (HR) leader, their compliance leader or auditor, Company legal counsel, a next level of management, Corporate, business or regional Ombuds, the Integrity helpline, and the GE Board of Directors. Confidentiality is respected, and reporting individuals may choose to remain anonymous. These reporting channels are available and accessible to employees in each country where the employees are employed and in multiple languages.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p>
<p>4. Conflict of interest</p>	
<p>4.1 Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?</p>	<p>Yes. GE’s Conflicts of Interest Policy, which is a key element of <i>The Spirit & The Letter</i>, defines conflicts of interest—actual, potential and perceived—and applies to all employees and board members. The policy requires all employees to make business decisions based on the best interest of GE, not what may be best for them personally. It also specifically advises that should a GE employee seek to undertake work with federal, state, or local governments, whether elected or appointed, the employee should first check with their business’ legal counsel and human resources office to assure they are complying with current conflict-of-interest laws as well as GE procedures.</p> <p>Further, GE’s Working with Governments Policy, also a key element of <i>The Spirit & The Letter</i>, defines conflicts of interest related to government employment. It provides that GE complies with all applicable laws and regulations and follows the highest ethical standards in conducting business with governments. This policy makes clear that GE employees should never enter into discussions with government employees or people close to them about prospective employment while they can influence decisions affecting GE. GE Aviation implements the Working With Governments Policy through various proprietary procedures, including the Hiring From the Government Implementing Procedure, GE Political Contributions Policy, and GE Lobbying</p>

	<p>Policy. These procedures ensure compliance with applicable ethics and conflict of interest laws and regulations regarding recruitment, retention, compensation, or employment present or former Government employees.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p> <p>https://www.ge.com/sites/default/files/GE_governance_principles.pdf</p>
<p>4.2 Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?</p>	<p>Yes. GE has procedures in place to identify, declare and manage conflicts of interest, which are overseen by individuals who are ultimately accountable for the appropriate management and handling of conflict of interest cases. All GE employees have a duty to disclose if their personal or financial activities may interfere or have the potential of interfering with their allegiance toward the company. GE Aviation implements the GE Conflicts of Interest Policy through the proprietary GE Aviation Managing Personal Relationships & Conflicts of Interest Procedure. Conflict of Interest Questionnaires completed by GE Aviation employees are reviewed by a designated risk leader, who engages with managers, Human Resources (HR), and Company legal counsel as appropriate to determine whether a conflict exists and an appropriate mitigation plan for confirmed conflicts. As part of <i>The Spirit & The Letter</i>, violation of the conflict of interest policy is subject to discipline up to and including termination.</p> <p>GE manages disclosure of actual, potential or perceived conflicts of interest electronically using a proprietary eConflicts of Interest survey tool (eCOI) available in 15 languages on GE’s intranet. Employee and officer eCOI disclosures are accessible to and reviewed by designated compliance leaders who work with legal counsel and other experts as needed to determine if a disclosure presents a conflict of interest and, if so, will either (i) provide directions on how to reduce the risk of a conflict of interest or (ii) prohibit the outside activity if the risk cannot be sufficiently reduced. Also, in accordance with GE’s Governance Principles, the Governance and Public Affairs Committee (GPAC) of the Board shall resolve any actual or potential conflicts of interest that arise for directors. All such</p>

	<p>disclosures are documented in the minutes of the GPAC meetings.</p> <p><i>Further reading:</i> https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf</p> <p>https://www.ge.com/sites/default/files/GE_governance_principles.pdf</p> <p>https://www.ge.com/investor-relations/sites/default/files/GPAC_Charter_May_2019.pdf</p>
<p>4.3 Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?</p>	<p>Yes. GE has a policy and procedure regulating the appointment of directors, employees and consultants from the public sector. GE’s Working With Governments Policy, which is a key element of <i>The Spirit & The Letter</i>, provides that GE complies with all applicable laws and regulations and follows the highest ethical standards in conducting business with governments. This policy makes clear that GE employees should never enter into discussions with government employees or people close to them about prospective employment while they can influence decisions affecting GE. GE Aviation implements the Working With Governments Policy through various proprietary procedures, including the Hiring From the Government Implementing Procedure, GE Political Contributions Policy, and GE Lobbying Policy. These procedures ensure compliance with applicable ethics and conflict of interest laws and regulations regarding recruitment, retention, compensation, or employment present or former Government employees. The Hiring From the Government Implementing Procedure provides specific guidance that a former government employee cannot be interviewed or hired before expiration of any mandatory cooling off period. It also provides a specific example of the United States government’s mandatory 1 to 2-year cooling off period for senior government employees. It also notes that cooling off periods are different across jurisdictions and requires consultation with the local GE Hiring From Government contact for country-specific guidance on cooling off periods.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/integrity</p>

	<p>https://www.ge.com/sustainability/sites/default/files/16-0020 GE SPIRIT LETTER-2_r10v3_11x8.5 PRINT ENGLISH.pdf</p> <p>https://www.ge.com/sites/default/files/GE_governance_principles.pdf</p> <p>https://www.ge.com/investor-relations/sites/default/files/GPAC Charter May 2019.pdf</p>
<p>4.4 Does the company report details of the contracted services of serving politicians to the company?</p>	<p>N/A. GE conducts due diligence prior to retaining consultants and avoids contracting the services of serving politicians. GE Aviation does not have any serving politicians contracted as consultants. This information is current as of February 2020.</p>
<p>5. Customer Engagement</p>	
<p>5.1.1 Does the company have a clearly defined policy and/or procedure covering political contributions?</p>	<p>Yes. GE has clearly defined policies and procedures covering political contributions. The GE Political Contributions Policy permits political contributions only where legal and appropriate and prohibits contributions based on the personal preferences of individual Company leaders. GE bases any political contribution decisions on what we believe supports strong public policy, promotes sustainable growth and robust markets and—at the same time—promotes innovation and the interests of the industries in which GE operates. GE Aviation implements the GE Political Contributions Policy through various proprietary procedures, including the GE Improper Payments Implementing Procedures, GE Controllership Policy, GE Travel & Living Policy, GE Aviation Business Courtesy Procedure, GE Aviation Intermediary Procedure, and GE Aviation Open Reporting and Investigation Process.</p> <p><i>Further reading:</i></p> <p>https://www.ge.com/sustainability/sites/default/files/GEA33643 Political Contributions Policy.pdf</p> <p>https://www.ge.com/sustainability/public-policy</p> <p>https://www.ge.com/investor-relations/sites/default/files/GPAC charter.pdf</p> <p>https://www.ge.com/sustainability/sites/default/files/16-0020 GE SPIRIT LETTER-2_r10v3_11x8.5 PRINT ENGLISH.pdf</p>

<p>5.1.2 Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?</p>	<p>Yes. Twice yearly, GE publishes details of political contributions made either by the company or the GE Political Action Committee (GEPAC).</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/sites/default/files/GEA33643_Political_Contributions_Policy.pdf</p> <p>https://www.ge.com/sustainability/reports-hub#politicalcontributions</p> <p>https://www.ge.com/sustainability/public-policy</p> <p>https://www.ge.com/investor-relations/sites/default/files/GPAC_charter.pdf</p> <p>https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p>
<p>5.1.3 Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?</p>	<p>Yes. GE’s Improper Payments Policy includes a clearly defined policy covering charitable donations and sponsorships, whether made directly or indirectly (including through corporate foundations), to ensure that any donations or sponsorship are not used as vehicles for bribery or corruption. GE Aviation implements the Improper Payments Policy’s controls covering charitable donations and sponsorships through various proprietary procedures, including the GE Improper Payments Implementing Procedures, GE Aviation Business Courtesy Procedure, GE Aviation Intermediary Procedure, GE Controllorship Policy, GE Travel & Living Policy, GE Political Contributions Policy, GE Lobbying Disclosure Policy, and GE Aviation Open Reporting and Investigation Process. Every year, GE publishes details of charitable contributions made by GE or the GE Foundation (the philanthropic organization of GE).</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/philanthropy</p> <p>https://www.ge.com/sustainability/sites/default/files/GEA19006_GE_Company_Contributions_greater_than_%2410K.pdf</p> <p>https://www.ge.com/sustainability/integrity</p>

	<p>https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p>
<p>5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?</p>	<p>Yes. GE has policies and procedures covering responsible lobbying. GE’s Improper Payments Policy includes a clearly defined policy covering lobbying expenditures, to ensure that any donations or sponsorship are not used as vehicles for bribery or corruption. The GE Lobbying Disclosure Policy provides that GE conducts lobbying activities in compliance with applicable laws and regulations and regularly trains employees on what types of activities and communications constitute reportable lobbying activities. Prior approval from GE’s President for Government Affairs & Policy is required before GE employees engage, directly or indirectly, in lobbying activities or retain an outside entity to engage in lobbying activities. GE Aviation’s policies on responsible lobbying are contained in various proprietary procedures, including the GE Lobbying Policy, GE Improper Payments Policy, Improper Payments Implementing Procedures, GE Political Contributions Policy, GE Controllership Policy, GE Travel & Living Policy, GE Aviation Business Courtesy Procedure, GE Aviation Intermediary Procedure, and GE Aviation Open Reporting and Investigation Process.</p> <p>These policies provide standards of conduct which constitute responsible lobbying and include oversight mechanisms to ensure responsible lobbying conduct. Employees are generally not permitted to engage in lobbying (either directly or via a third-party lobbyist) of Government Officials, whether inside or outside the US. Before engaging in any lobbying activities must contact the VP of Government Affairs & Policy, their Lobbying Disclosure Act (LDA) Business Liaison, or Corporate Governmental Compliance Leader to ensure that any such activities are compliant with applicable laws, including those regarding disclosure of lobbying activities. These policies make clear that employees who engage in communications with government officials or government employees must refrain from making communications that create an appearance of an attempt to influence or reward a governmental act or decision in an inappropriate manner. Hiring a third party to represent GE in connection with lobbying activities is prohibited unless and until obtaining the prior approval from the Vice President, Government Affairs & Policy or that officer’s designee. For</p>

	<p>example, GE Aviation requires that at a minimum, all gifts and hospitalities over \$50 that are provided to government officials or employees of state-owned entities must be reviewed and pre-approved by a designated focal in the compliance department. The policy also lists lower thresholds for countries where this is required; e.g., for United States government employees, the policy requires all gifts and hospitalities to be preapproved. All submissions for preapproval of gifts or hospitality are made through a dedicated system which records the request, any supporting documentation, and the approval itself. This record is accessible to those responsible for oversight of this process.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/sites/default/files/GEA33662_Lobbying_Disclosure_Policy.pdf</p> <p>https://www.ge.com/sustainability/public-policy</p> <p>https://www.ge.com/investor-relations/sites/default/files/GPAC_charter.pdf</p> <p>https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p>
<p>5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?</p>	<p>Yes. GE publishes details of the aims and topics of its public policy development and lobbying activities. As one of the world’s largest companies, and one active in many sectors of the global economy, GE engages in public policy discussions that impact our Company, our workers, and our communities. GE approaches public policy through education, engagement, involvement and thought leadership. We inform discussions by promoting thoughtful discourse grounded in strong, fact-based and reasoned analysis. We work in partnership with governments, believing that tackling the world’s biggest problems is possible only if governments and industry work together as partners. GE works to promote public policy issues in areas such as energy, healthcare, transportation, international trade and investment, tax, data governance, rule of law, and government procurement. We are committed to engaging with governments— globally, nationally, and locally— through constructive dialogue, promotion of innovative public policy ideas, formation of novel public-private partnerships, and investments in solutions that help address the fundamental challenges that confront societies. Globally,</p>

we support public policies that promote open markets, technology, and innovation. GE's most recent public policy priorities include rule of law globally; effective laws and regulations governing the transfer and protection of data; trade policy; global energy and environmental policies; government procurement; intellectual property protection; promotion of exports and the free flow of goods; tax reform and competitive economic policy; regulatory reform associated with energy, infrastructure, healthcare and digital policy; effective and modernized defense procurement; policies that facilitate the movement of people consistent with business needs; and policies to promote effective economic development in less-developed countries.

GE's Board of Directors believes that it is in the best interest of GE's stakeholders to promote sound public policies at the international, national, and local levels. To that end, our Government Affairs & Policy team works with GE's business teams to develop a semiannual assessment of their legislative and regulatory priorities. Similarly, we conduct surveys of issues and priorities across GE's regions worldwide. Each business provides a description of its public policy priorities, ties these to a GE objective, and provides input on the significance of the respective issue(s) to the company.

The businesses also provide input on the appropriate advocacy plan or strategy for achieving a successful outcome—including whether or not GE should advocate for a priority directly or through one of its trade associations or industry coalitions. In the latter case, GE can help facilitate coordination with other companies with similar priorities. Once each business has assessed and submitted its priorities, our Government Affairs & Policy team can better determine GE's overall public policy priorities and allocate resources to them accordingly. In evaluating public policy priorities for an upcoming year, Government Affairs & Policy works with GE's senior management to review the potential reputational consequences and risks of pursuing or not pursuing a priority. We set commercial priorities to increase shareowner value, mindful that our commercial success depends on progress on broader public policy imperatives.

Further reading:

https://www.ge.com/sustainability/sites/default/files/GEA33642_Setting_Public_Policy_Priorities.pdf

	<p>https://www.ge.com/sustainability/sites/default/files/GEA33665_Public_Policy_Priorities.pdf</p> <p>https://www.ge.com/sustainability/public-policy</p>
<p>5.2.3 Does the company publish full details of its global lobbying expenditure?</p>	<p>GE uses the Internal Revenue Code method to detail its lobbying expenses in its federal Form LD-2 lobbying report filed each calendar quarter. Under this method, expenses related to state and/or local legislative lobbying in all 50 states are included in GE’s total lobbying expense reported each quarter.</p> <p><i>Further reading:</i></p> <p>https://www.ge.com/sustainability/reports-hub#publicpolicy.</p> <p>https://www.ge.com/sustainability/public-policy</p> <p>http://disclosures.house.gov/ld/ldxmlrelease/2019/Q1/301036112.xml</p>
<p>5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?</p>	<p>Yes. GE has a comprehensive Improper Payments Policy that governs the giving and receipt of gifts and hospitality, with clear procedures designed to ensure such gifts and hospitality are bona fide to prevent undue influence or other corruption. GE Aviation implements the Improper Payments Policy through various proprietary procedures, including the GE Improper Payments Implementing Procedures, GE Aviation Business Courtesy Procedure, GE Controllership Policy, GE Travel & Living Policy, GE Political Contributions Policy, GE Lobbying Disclosure Policy, and GE Aviation Open Reporting and Investigation Process. These policies and procedures require that all business gifts and hospitality must have a legitimate business purpose, be reasonable and in good taste, be provided transparently and in good faith without expectation of reciprocity, not be intended or likely to influence performance of official duties, and comply with all laws and ethics rules applicable to GE and the recipient. These policies and procedures establish financial limits, along with an approval procedure, for the different types of promotional expense that employees may encounter, including requirements and procedures to obtain preapproval for business gifts, hospitality, or any other thing of value above appropriate thresholds. These policies and procedures also explicitly address the risks associated with gifts and hospitality given to and/or received from domestic</p>

	<p>and foreign public officials, e.g. by specifying a different financial threshold, and include a clear statement that all gifts and hospitality above certain thresholds are recorded in a dedicated register or central depository that is accessible to those responsible for oversight of the process.</p> <p>For example, GE Aviation requires that at a minimum, all gifts and hospitalities over \$50 that are provided to government officials or employees of state-owned entities must be reviewed and pre-approved by a designated focal in the compliance department. The policy also lists lower thresholds for countries where this is required; i.e. for United States government employees, the policy requires all gifts and hospitalities to be preapproved. All submissions for preapproval of gifts or hospitality are made through a dedicated system that records the request, any supporting documentation, and the approval itself. This record is accessible to those responsible for oversight of this process. GE Aviation policies generally prohibit the receipt of any gifts or hospitalities from suppliers except for a few clearly itemized exceptions, for example certain promotional items of nominal value under \$10 where the item is not solicited by the employee and satisfies other criteria enumerated in the policy.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/integrity https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption_Factsheet_R5.pdf</p>
<p>6. Supply Chain Management</p>	
<p>6.1 Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?</p>	<p>Yes. GE Aviation requires the involvement of its procurement department—known as the GE Aviation Sourcing Department—in the establishment of new supplier relationships and in the oversight of its supplier base. The Sourcing Department, including the Sourcing Compliance team, must vet and approve all GE Aviation suppliers. The onboarding process is workflow-based and a supplier cannot be onboarded without completing each step in the multi-</p>

	<p>level review process. The process includes diligence in multiple areas (questionnaires, entity verification, certifications, site visits where risk level warrants it, among others) and approval is required from a variety of sourcing employees and risk area specialists, including compliance, finance, legal, IT and commodity leaders.</p> <p>Further reading: http://www.gesupplier.com/html/SuppliersIntegrityGuide.htm https://www.geaviation.com/company/doing-business-aviation https://www.ge.com/sustainability/human-rights-supply-chain https://www.ge.com/sustainability/sites/default/files/GEA33731_Ethical_Supply_Chain_Program_Jan2019.pdf</p>
<p>6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or reengaging with its suppliers?</p>	<p>Yes. GE Aviation conducts comprehensive, risk-based due diligence when engaging new suppliers and periodically thereafter. This process includes risk-based anti-bribery and corruption due diligence, entity validation, screening for compliance with international trade laws and regulations, checks on ultimate beneficial ownership, and other onboarding requirements. Higher risk suppliers are subject to heightened due diligence. Prior to onboarding, any direct supplier identified as high risk (located in a high-risk country and/or specific commodity) also undergoes a physical audit by a certified GE auditor to evaluate the supplier in areas such as human rights, environmental compliance, health and safety, security. These audits are repeated every 1 to 3 years depending on the location of the supplier and the level of risk. All findings are documented and tracked to closure in a central online database which includes details from all prior audits and whether the supplier is approved, rejected or under review. A supplier cannot be onboarded until findings of concern are adequately addressed. If a concern is identified during a repeat audit it must be addressed in a timely manner or the supplier may be terminated. GE Aviation also conducts a daily watchlist screening against all entities with whom it does business. Any match that is made gets flagged and escalated for immediate follow up.</p> <p><i>Further reading:</i></p>

	<p>http://www.gesupplier.com/html/SuppliersIntegrityGuide.htm</p> <p>https://www.geaviation.com/company/doing-business-aviation</p> <p>https://www.ge.com/sustainability/human-rights-supply-chain</p> <p>https://www.ge.com/sustainability/sites/default/files/GEA33731_Ethical_Supply_Chain_Program_Jan2019.pdf</p>
<p>6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?</p>	<p>Yes. All suppliers must agree to follow the GE Integrity Guide for Suppliers, Contractors and Consultants, which requires suppliers to maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery of government officials; not to offer or provide, directly or indirectly, anything of value, including cash, bribes, gifts, entertainment or kickbacks, including offers of employment, or participation in a contest, game or promotion, to any GE employee, representative or GE customer or to any government official in connection with any GE procurement, transaction or business dealing; and to provide supporting data to GE when requested. In addition, all GE suppliers must ensure that they and their employees, workers, representatives, suppliers and subcontractors comply with the standards of conduct set out in the Integrity Guide and in other contractual obligations to GE.</p> <p><i>Further reading:</i></p> <p>http://www.gesupplier.com/html/SuppliersIntegrityGuide.htm</p> <p>https://www.geaviation.com/company/doing-business-aviation</p> <p>https://www.ge.com/sustainability/human-rights-supply-chain</p> <p>https://www.ge.com/sustainability/sites/default/files/GEA33731_Ethical_Supply_Chain_Program_Jan2019.pdf</p>
<p>6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a</p>	<p>Yes. All suppliers must agree to follow the GE Integrity Guide for Suppliers, Contractors and Consultants, which requires suppliers to maintain and enforce a policy requiring adherence to lawful business practices, including a</p>

<p>minimum adhere to the standards established by the main contractor?</p>	<p>prohibition against bribery of government officials; not to offer or provide, directly or indirectly, anything of value, including cash, bribes, gifts, entertainment or kickbacks, including offers of employment, or participation in a contest, game or promotion, to any GE employee, representative or GE customer or to any government official in connection with any GE procurement, transaction or business dealing; and to provide supporting data to GE when requested. In addition, all GE suppliers must ensure that they and their employees, workers, representatives, suppliers and subcontractors comply with the standards of conduct set out in the Integrity Guide and in other contractual obligations to GE. GE Aviation’s standard supplier contract terms include audit rights and termination rights in the case of non-compliance. GE also audits sub-tier special process suppliers on a regular basis from a quality standpoint.</p> <p><i>Further reading:</i> http://www.gesupplier.com/html/SuppliersIntegrityGuide.htm https://www.geaviation.com/company/doing-business-aviation https://www.ge.com/sustainability/human-rights-supply-chain https://www.geaviation.com/sites/default/files/C64_20200213.pdf https://www.geaviation.com/sites/default/files/I64_20200213.pdf</p>
<p>6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?</p>	<p>The company publishes environmental, social and governance related incidents in its audits of its suppliers and this data includes findings related to ethics or corruption.</p> <p>https://www.ge.com/sustainability/sites/default/files/GE_ESG_KPIs_RY2018_r11_Sep2019.pdf</p>
<p>7. Agents and Intermediaries</p>	
<p>7.1.1 Does the company have a clear policy on the use of agents?</p>	<p>Yes. GE Aviation has a clear policy and procedure on the use of agents and other third-party intermediaries (including distributors, brokers, consultants, sales partners, and lobbyists) who act on GE Aviation’s behalf or with GE Aviation to promote, market, and sell our products and services. These policies and procedures address the corruption risks associated with the use of third parties and</p>

	<p>provide details of specific controls to mitigate these risks, and include the GE Aviation Intermediary Procedure, GE Improper Payments Policy, GE Improper Payments Implementing Procedures, GE Onboarding Due Diligence Policy, GE Aviation Business Courtesy Procedure, GE Controllership Policy, GE Travel & Living Policy, GE Political Contributions Policy, and GE Lobbying Disclosure Policy. As part of these policies and procedures, GE Aviation commits to establishing and verifying that the use of an agent is, in each case, necessary to perform a legitimate business function. GE Aviation has a dedicated third-party risk owner who manages third-party intermediary policies and procedures and oversees the rigorous screening, training, and approval process that every intermediary must go through prior to onboarding, periodically by policy, any time there is a significant change in the business relationship or a contract expiration/renewal. GE Aviation has refused and/or terminated relationships pursuant to this process as a result of red flags found in due diligence, inherent risks in the geographic location of the proposed territory, or other risks GE Aviation believe cannot be effectively ameliorated. GE Aviation believes certain aspects of these policies and procedures are more effective at combatting corruption when maintained as confidential to GE.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/integrity https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf</p>
<p>7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or reengaging its agents and intermediaries?</p>	<p>Yes. GE Aviation has formal procedures to conduct risk-based anti-bribery and corruption due diligence prior to engaging or re-engaging any agents and other third-party intermediaries. GE Aviation performs this process periodically according to its policy and any time there is a significant change in the business relationship or a contract expiration and/or renewal. High risk agents and other third-party intermediaries are subject to additional due diligence requirements. GE Aviation does not engage intermediaries where the risks identified in the due diligence cannot be sufficiently mitigated, and terminates engagement if such risks develop later or new red flags warranting termination</p>

	<p>are brought to its attention. GE Aviation implements these procedures through the GE Aviation Intermediary Procedure, GE Improper Payments Policy, GE Improper Payments Implementing Procedures, GE Onboarding Due Diligence Policy, GE Aviation Business Courtesy Procedure, GE Controllership Policy, GE Travel & Living Policy, GE Political Contributions Policy, and GE Lobbying Disclosure Policy. GE Aviation believes certain aspects of these policies and procedures are more effective at combatting corruption when maintained as confidential to GE.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/integrity</p> <p>https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p> <p>https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf</p>
<p>7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?</p>	<p>Yes. GE Aviation has formal, risk-based procedures to establish the beneficial ownership of agents and other intermediaries. GE Aviation requires agents and other intermediaries to disclose their ownership, and verifies this information according to a risk-based approach. GE Aviation performs this function before establishing a relationship with an agent or intermediary, at periodic intervals throughout the business relationship, at the renewal of any business relationship, any time there is a significant change in the business relationship, upon the change in control of the agent or other intermediary, and if a red flag or integrity concern involving beneficial ownership is identified. GE Aviation declines to engage or terminates engagements with agents and other intermediaries where ownership information, or the lack thereof, identifies red flags warranting termination. GE Aviation believes certain aspects of these procedures are more effective at combatting corruption when maintained as confidential to GE.</p> <p><i>Further reading:</i> https://www.ge.com/sustainability/integrity</p> <p>https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p>

	<p>https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf</p>
<p>7.1.4 Does the company’s anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?</p>	<p>Yes. GE Aviation’s anti-bribery and corruption policy applies to any non-GE person or entity—including agents and other intermediaries—that acts on GE Aviation’s behalf or with GE Aviation to promote, market, and sell its products and services. GE Aviation requires all agents and other intermediaries to include anti-bribery and corruption clauses in their contracts. In addition, GE Aviation requires all contracts with agents and other intermediaries to include the right for GE Aviation to be informed of compliance with anti-bribery and corruption clauses, to audit compliance thereof, and to terminate such contracts for breach thereof.</p>
<p>7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?</p>	<p>Yes. As part of GE Aviation’s comprehensive review and approval process for agents and other intermediaries, the compensation terms and other incentive schemes are designed and evaluated to promote ethical behavior and discourage corrupt practices. Commissions, discounts and other incentive schemes are reviewed, evaluated for risk, and limited pursuant to policy controls. Payments are made over the course of contracts based on clearly-defined milestones, including hourly rates, the closing of legitimate transactions, or retainers that are reasonable based upon market rates. In addition, GE Aviation requires all contracts with agents and other intermediaries to include the right for GE Aviation to suspend payments and terminate the engagement for breach of anti-bribery and corruption requirements.</p>
<p>7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?</p>	<p>GE is a large, multi-national company public company. GE discloses third-party relationships as required by public disclosure and reporting requirements in filings with the United States Securities and Exchange Commission (SEC) and via the GE Investor Relations website. To comply with laws and contract requirements involving classified, proprietary, and confidential information and programs, GE Aviation does not publish details of all agents contracted to act with and on behalf of the company.</p> <p><i>Further reading:</i> https://www.sec.gov/cgi-bin/browse-edgar?action=getcompany&CIK=0000040545&owner=exclude&count=40&hidefilings=0</p>

	<p>https://www.sec.gov/Archives/edgar/data/40545/000004054519000014/0000040545-19-000014-index.htm</p> <p>https://www.ge.com/investor-relations/overview</p> <p>https://www.ge.com/investor-relations/sites/default/files/GE_AR18.pdf</p>
<p>7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?</p>	<p>GE publishes high-level results from incident investigations, including for improper payments (ethical, bribery or corruption-related investigations involving agents), and disciplinary actions at all levels on a yearly basis.</p> <p><i>Further reading:</i></p> <p>https://www.ge.com/sustainability/sites/default/files/GE_ESG_KPIs_RY2017_r13_Aug2018.pdf</p> <p>https://www.ge.com/sustainability/sites/default/files/GE_ESG_KPIs_RY2018_r11_Sep2019.pdf</p> <p>https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf</p>
<p>7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?</p>	<p>Yes. GE Aviation conducts risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures. This includes establishing the ultimate beneficial ownership of the partner company, with enhanced due diligence for joint ventures operating in high risk countries or with high risk partners, such as state-owned enterprises.</p>
<p>7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture relationships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?</p>	<p>Entities in which GE owns more than 50 percent of voting rights, or which GE has the right to control, are required to adopt and follow GE compliance policies, including its anti-bribery and anti-corruption policies. Non-controlled affiliates are encouraged to adopt and follow GE compliance policies.</p> <p><i>Further reading:</i></p> <p>https://www.ge.com/sustainability/integrity</p> <p>https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p>
<p>7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?</p>	<p>Entities in which GE owns more than 50 percent of voting rights, or which GE has the right to control, are required to adopt and follow GE compliance policies, including its anti-bribery and anti-corruption policies. Non-controlled affiliates are encouraged to adopt and follow GE compliance policies.</p>

	<p><i>Further reading:</i> https://www.ge.com/sustainability/integrity https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p>
<p>8. Offsets</p>	
<p>8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?</p>	<p>Yes. GE Aviation explicitly addresses corruption risks associated with offset contracting. GE Aviation has a dedicated Offset team. On an annual basis, the offset team members must review and re-commit to the companies’ compliance policies and receive training on compliance risks and the company’s Ombuds process. Compliance oversight and corruption risks associated with offset contracting are addressed by internal controls that include a rigorous review process that requires approvals from senior company executives and appropriate compliance personnel. GE Aviation has a robust and transparent system to manage the full life cycle of offset activities through a tracking tool. Every sale is managed through four primary stages: Prospect, Proposal, Negotiation, Win/Execution. Any International customer triggers a verification by a dedicated regional offset director. The acceptance of an offset obligation requires business approval at the VP or President level (depending on valuation). The life cycle management of the obligation is then tracked from prospect, development and execution (including cost, status and Customer Connect) through the tracking of Offset credit approvals by the specific country’s offset authority. GE Aviation does not make a practice of contracting ‘Offset Partners’ for fulfillment of a GE obligation.</p>
<p>8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?</p>	<p>GE Aviation has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on key aspects of its offset obligations. This process specifically includes due diligence checks on parties involved in offset transactions through rigorous on-boarding processes for customers and suppliers. As part of this process, the company's policy also commits to establishing and verifying that the offset obligation proposed is founded on a legitimate rationale through formal internal reviews that include company executives. The company refreshes this due diligence periodically, whenever there is a significant change in the business relationship or if there is any cause for concern. GE Aviation, as part of the offset project</p>

	<p>development, utilizes a dedicated portal to approve the beneficiary of any project. If a beneficiary is not approved in this portal, the offset manger initiates the approval process and does not proceed until approval is obtained. The approval is documented within GE Aviation’s tracking tool. In order to mitigate conflicts of interest in beneficiaries, GE Aviation reviews the origination of the project; for example, was the project generated by a GE employee (without any external influence) or was the project brought to GE by a non-GE interested party. Any potential projected generated by a non-GE employee, would require special attention and due diligence to mitigate a conflict of interest.</p>
<p>8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?</p>	<p>GE Aviation’s offset function does not engage brokers or offset agents to act on behalf of the company. The company’s dedicated Offset team members generate and execute both direct and indirect offset transactions directly with the offset transaction recipients/partners and interact directly with the customer or the governing offset authority.</p>
<p>8.4 Does the company publish details about the beneficiaries of its indirect offset projects?</p>	<p>At the discretion of GE and its Customer, GE Aviation will decide on a case by case basis if the details of an Offset transaction warrant a public communication to share the value that the Offset transaction has delivered to the customer and/or the region involved.</p>
<p>9. High Risk Markets</p>	
<p>9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?</p>	<p>Yes. GE Aviation acknowledges the corruption risks associated with operating in different markets. It has internal policies and procedures in place that consider these specific risks including but not limited to specialized customer, supplier, and third-party intermediary diligence depending on a country’s inherent corruption risk. Inherent corruption risk is determined through analysis of multiple factors including reference to independent third-party analyses, such as the Transparency International Corruption Perceptions Index, and current geopolitical climate. The results of these risk assessments have a direct impact on business decisions and inform the development and implementation of additional controls; they may even lead to termination of or refusal to initiate a customer, third party, supplier relationship. Other controls might include an added layer of compliance review of invoices outside the sales pipeline, ban on certain payment structures more amenable to corruption, or other action tailored to the specific compliance risk.</p> <p><i>Further reading:</i></p>

	<p>https://www.ge.com/sustainability/integrity</p> <p>https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p> <p>https://www.geaviation.com/company/doing-business-aviation</p>
<p>9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?</p>	<p>GE is a large, multi-national company public company with more than 280,000 employees and numerous business units, subsidiaries, and corporate affiliates worldwide. GE is publicly traded on the New York Stock Exchange (NYSE) as “GE.” GE discloses the details of principal corporate affiliates in filings with the United States Securities and Exchange Commission (SEC) and via the GE Investor Relations website.</p> <p><i>Further reading:</i></p> <p>https://www.nyse.com/quote/XNYS:GE</p> <p>https://www.sec.gov/cgi-bin/browse-edgar?action=getcompany&CIK=0000040545&owner=exclude&count=40&hidefilings=0</p> <p>https://www.sec.gov/Archives/edgar/data/40545/000004054519000014/0000040545-19-000014-index.htm</p> <p>https://www.ge.com/investor-relations/overview</p> <p>https://www.ge.com/investor-relations/sites/default/files/GE_AR18.pdf</p>
<p>9.3 Does the company disclose its beneficial ownership and control structure?</p>	<p>Yes. GE is a large, multi-national company public company and is publicly traded on the New York Stock Exchange (NYSE) as “GE.” GE discloses ownership and control structure as part of its public disclosure and reporting requirements in filings with the United States Securities and Exchange Commission (SEC) and via the GE Investor Relations website.</p> <p><i>Further reading:</i></p> <p>https://www.nyse.com/quote/XNYS:GE</p> <p>https://www.sec.gov/cgi-bin/browse-edgar?action=getcompany&CIK=0000040545&owner=exclude&count=40&hidefilings=0</p>

	<p>https://www.sec.gov/Archives/edgar/data/40545/000004054519000014/0000040545-19-000014-index.htm</p> <p>https://www.ge.com/investor-relations/overview</p> <p>https://www.ge.com/investor-relations/sites/default/files/GE_AR18.pdf</p>
<p>9.4 Does the company publish a percentage breakdown of its defence sales by customer?</p>	<p>GE is a large, multi-national company public company. GE discloses its defense industry sales as required by public disclosure and reporting requirements in filings with the United States Securities and Exchange Commission (SEC) and via the GE Investor Relations website. To comply with laws and contract requirements involving classified, proprietary, and confidential information and programs, GE does not publish all details of defense industry sales.</p> <p><i>Further reading:</i></p> <p>https://www.sec.gov/cgi-bin/browse-edgar?action=getcompany&CIK=0000040545&owner=exclude&count=40&hidefilings=0</p> <p>https://www.sec.gov/Archives/edgar/data/40545/000004054519000014/0000040545-19-000014-index.htm</p> <p>https://www.ge.com/investor-relations/overview</p> <p>https://www.ge.com/investor-relations/sites/default/files/GE_AR18.pdf</p>
<p>10. State Owned Enterprises</p>	<p>GE is a large, multi-national company public company and is publicly traded on the New York Stock Exchange (NYSE) as "GE." GE is not a State-Owned Enterprise.</p> <p><i>Further reading:</i></p> <p>https://www.nyse.com/quote/XNYS:GE</p>
<p>10.1 Does the SOE publish a breakdown of its shareholder voting rights?</p>	<p>N/A</p>
<p>10.2 Are the SOE's commercial and public policy objectives publicly available?</p>	<p>N/A</p>
<p>10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?</p>	<p>N/A</p>

10.4 Is the company's audit committee composed of a majority of independent directors?	N/A
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?	N/A