



GE Aerospace



# The Spirit & The Letter

“ *The Spirit and The Letter serves as our compass for ethical conduct, reflecting our core values and supporting our long-standing tradition of unyielding integrity. These guiding principles and policies set forth our expectations of all employees and lay the foundation for sound decision-making, ensuring that we act in a compliant manner that is consistent with our code of conduct. By adopting these policies and behaviors, we create an environment where everyone can thrive and deliver the very best of GE Aerospace to our customers and partners.* ”

*You have the power to influence GE Aerospace’s reputation worldwide by how you embrace the Spirit and the Letter. By committing to these principles, you ensure that the work we do upholds our purpose: We invent the future of flight, lift people up, and bring them home safely. ”*

**Melissa Kelly**

Vice President & Chief Compliance Officer

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**Need more help?** Visit [compliance.geaerospace.net](https://compliance.geaerospace.net) to:

- Find a business compliance leader
- Raise a concern
- Review policies
- Download and view job aids, videos and more!

## Learn Our Policies – THE LETTER

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# The Spirit

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The Spirit embodies our promise to act ethically at all times. At GE Aerospace, we commit to doing the right thing, always with unyielding integrity.

# Ethics: The GE Aerospace Way



## Key Principles

- 1 Be honest, fair and trustworthy in all of your activities and relationships.
- 2 Obey applicable laws and regulations governing our business worldwide.
- 3 Fulfill your obligation to be the Voice of Integrity and promptly report any concerns you have about compliance with law, GE Aerospace policy or this Code.



## Key Questions

The Spirit & The Letter is not a substitute for your good judgment, and it cannot cover every conceivable situation. You should be alert to signs that you or your colleagues are in an integrity gray area and ask yourself three simple questions if you have any doubts about what you should do:

- 1 How would this decision look to others within GE Aerospace and externally?
- 2 Am I willing to be held accountable for this decision?
- 3 Is this consistent with GE Aerospace's Code of Conduct?

**Remember:** Act if you see an issue. Ask if you are unsure.

# Who Should Follow These Policies



**The Spirit & The Letter must be followed by anyone who works for or represents GE Aerospace.**

## **This Includes**

- GE Aerospace directors, officers and employees.
- Subsidiaries and controlled affiliates. Entities in which GE Aerospace owns more than 50 percent of voting rights, or which GE Aerospace has the right to control, are required to adopt and follow GE Aerospace compliance policies.

*Non-controlled affiliates should be encouraged to adopt and follow GE Aerospace compliance policies.*

## **GE Aerospace employees working with third parties such as consultants, agents, sales representatives, distributors and independent contractors must**

- Require these parties to agree to comply with relevant aspects of GE Aerospace's compliance policies.
- Provide these parties with education and information about policy requirements.
- Take action, up to and including terminating a contract, after learning that a third party failed to abide by GE Aerospace's compliance policies.

**Important:** This Code and the policies described in it are not an employment contract. GE Aerospace does not create any contractual rights, express or implied, by issuing the Code or the policies.

# What Employees Must Do

## Be Knowledgeable

- Gain a basic understanding of the Spirit & Letter compliance policies.
- Learn the details of any Spirit & Letter policy that is relevant to your individual job responsibilities.
- Learn about your detailed business and regional policies and procedures and understand how to apply them to your job.

## Be Aware

- Stay attuned to developments in your area or industry that might impact compliance with laws and regulations or reputation in the marketplace.
- Understand GE Aerospace may review, audit, monitor, intercept, access and disclose information processed or stored on GE Aerospace equipment and technology, or on personally owned devices permitted GE Aerospace network access.

## Be Committed

- Promptly raise any concerns about potential violations of law or policy.
- Cooperate fully and honestly in investigations related to integrity concerns.

## The Cost of Noncompliance

- Employees and leaders who do not fulfill their integrity responsibilities face disciplinary action up to and including the termination of their employment. The following examples of conduct can result in disciplinary action.

## Examples of Misconduct

- **Violating law or policy** or requesting that others do the same.
- **Retaliating against another employee** for reporting an integrity concern.
- **Failing to promptly report** a known or suspected violation of compliance policies.
- **Failing to fully and honestly cooperate** in investigations of possible policy violations.
- **Failing as a leader** to diligently ensure compliance with integrity principles, policies and law.

# What Leaders Must Do

**GE Aerospace holds its leaders accountable for fostering a culture of compliance. Leaders' responsibilities span prevention, detection and response to compliance issues.**



## Prevent

- Incentivize compliance and personally set the example for integrity — not just through words, but more importantly, through actions.
- Never compromise integrity to meet a deadline, satisfy a customer or increase revenue.
- Promote Open Reporting and ensure employees know how to raise concerns and feel safe doing so.
- Ensure your team can recognize “red flags” for key risks and completes assigned compliance training in a timely manner.
- Help employees understand how and where to seek additional guidance and ask questions.
- Understand and follow the policies, laws and regulations that apply to your team. If unsure, ask an expert in Legal or Compliance.



## Detect

- Conduct periodic compliance reviews with the assistance of business compliance leaders and/or Internal Audit.
- Implement control measures to detect compliance risks and violations.



## Respond

- Document and escalate any employee's expressed concern through the appropriate channels.
- Take prompt corrective action to address identified compliance weaknesses.
- Take appropriate disciplinary action.
- Integrate employees' integrity contributions into evaluations and recognition and reward programs.

# The Letter

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The Letter covers our Spirit & Letter compliance policies. These policies apply to all employees, everywhere in the world. This Code provides an introductory summary to these policies—not the full policies themselves.

Go to [compliance.geaerospace.net](https://compliance.geaerospace.net) for the full policies, as well as detailed policy information and resources to help you.

# Respectful Workplace

We treat one another with fairness and respect.

## The GE Aerospace Way

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- GE Aerospace is committed to providing a safe, fair, and respectful work environment.
- GE Aerospace does not tolerate any form of harassment, discrimination, or bullying.
- GE Aerospace is an equal opportunity employer and makes all employment decisions based on legitimate business considerations, such as experience, skills, education, performance, and the GE Aerospace Way.

## Integrity in Action

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**Q:** During a recent team lunch, one of my colleagues made an off-handed joke about an ethnic stereotype. How should I respond to this situation?

**A:** You have a few different options. (1) Be direct, factual, and professional and inform the person that this is unacceptable: “What you said is inappropriate here” or “I was offended by what you just said” or “I was not offended, but someone else might be”; (2) Disrupt/redirect the conversation: “That wasn’t funny” or “We need to focus on the task at hand.” Later follow up with the person directly to be clear that the conduct was not acceptable and must stop; or (3) Raise an integrity concern through one of our Open Reporting channels.

## Your Role

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- Treat employees, applicants, customers, suppliers, contractors, and anyone else you interact with for or on behalf of GE Aerospace with fairness and respect.
- Create and foster a work environment free from discrimination, bullying and harassment.
- Do not refuse to work or cooperate with others because of protected characteristics.
- Never make an unwelcome sexual advance to or create an unwelcome working environment for anyone you interact with.



## Policy Spotlight

Protected characteristics under GE Aerospace policy include: race, color, religion, national or ethnic origin, ancestry, sex (including pregnancy and related conditions), gender (including gender identity and expression), sexual orientation, marital status, genetic information, age, disability, military and veteran status or any other characteristic protected by law.

## Help Corner

S&L Respectful  
Workplace Policy



## Policy Spotlight

Fundamental human rights include decent and safe working conditions, freedom of association, prohibitions on forced and child labor, and respect for community security and the environment.

## Help Corner

S&L Human Rights Policy  
Human Rights  
Statement of Principles

# Human Rights

**We respect and support human rights.**

## The GE Aerospace Way

- We respect all internationally recognized human rights in line with the *United Nations Guiding Principles on Business and Human Rights*.
- We seek to treat everyone affected by our business and value chain with fairness and dignity.
- Our commitment is to do our best to identify and address relevant risks by keeping our eyes always open to suspicious conditions and conducting reasonable due diligence.

## Suspicious Third-Party Conditions to Report

- Workers who appear below the age of 16 or the local legal working age, whichever is higher
- Unsafe working conditions or unsanitary worker living conditions
- Refusals by management to permit engagement with workers
- Refusals to allow workers to associate freely (formally or informally) to improve their workplace
- Visible signs of workplace abuse, including harassment, bullying, discrimination or violence
- Rumors of workers paying recruitment fees for their jobs, not being paid appropriately, or being coerced into working or remaining on a job through measures such as passport withholding

## Your Role

- Immediately notify your compliance leader or use standard Open Reporting channels if you observe any conditions or circumstances that reflect possible mistreatment of workers or other individuals in our value chain.
- Read GE Aerospace's public statements on human rights and participate in company training to understand how we can impact the human rights of our extended value chain.
- Respect the fundamental human rights of those with whom you interact and require the same of our suppliers, contractors and business partners.
- Exercise an "Eyes Always Open" approach at GE Aerospace, customer and supplier sites.

# Fair Competition

**We do not cheat to compete.**

## The GE Aerospace Way

- We believe in a free and competitive marketplace. We comply with antitrust and competition laws in all our activities.
- We must never enter into improper agreements with other companies to fix prices or terms to be offered to customers, allocate markets or customers, or manipulate the bidding process.

## Integrity in Action

**Q:** I'm talking to a customer, and he is proposing to show me a competitor quote. What should I do? Can I discuss or accept copies of competitor quotes from the customer?

**A:** It is a normal part of negotiations for a customer to make statements regarding competitor pricing and other commercial terms and ask GE Aerospace to improve its offer. However, if a customer offers to give you a competitor's document, before accepting you must ask if the customer is allowed to provide the document. Even if the customer says it is allowed to provide the document, you must not accept any document that is marked "Confidential", "Subject to Nondisclosure Agreement" (or similar markings) or that you believe to be confidential. If you receive competitive information, you must submit it (including any documents) in the Competitive Information Reporting System (CIMS). You should always contact your organization's legal counsel or compliance representative if you have any questions or concerns. Remember that time sensitive reporting requirements can exist.

## Your Role

- Do not propose or enter into any agreement or understanding with any competitor about any aspect of competition between GE Aerospace and a competitor, including agreements on pricing, bidding, deal terms, wages or the allocation of markets or customers.
- Do not propose or enter into any agreement with any other party regarding whether or how to bid.
- Avoid contacts of any kind with competitors that could create the appearance of improper agreements or understandings. Actively disassociate yourself from any situations in which improper agreements or information sharing between competitors are raised, and promptly inform legal/compliance.
- Understand and follow your business's specific guidelines about contacts with competitors, obtaining and handling competitive information, and participating in trade and professional associations.
- Do not provide, receive or exchange any competitively sensitive information including proposals in their entirety or selected sections with any other offeror, a competitor or its representative, whether in person, electronically or at an industry meeting.
- Do not enter into discussions or agreements with other companies not to hire or solicit each other's employees, and do not discuss wages or benefits with other companies who compete for the same talent pool.



## Policy Spotlight

Be careful in all interactions with competitors to avoid even the perception of an improper agreement. Unspoken or implied agreements—simply the appearance of unfairness or deception—can give rise to reputational harm and legal liability, including significant fines and even jail time.

## Help Corner

S&L Fair Competition Policy



## Policy Spotlight

Bribery concerns are not limited to government officials—many countries and companies also prohibit bribery in the private sector. Gifts, entertainment or anything else of value provided in exchange for improper assistance or consideration could be viewed as a bribe.

## Help Corner

S&L Improper Payments Prevention Policy

Business Courtesy Procedure

# Improper Payments Prevention

**We do not engage in bribery or corruption of any kind.**

## The GE Aerospace Way

- GE Aerospace prohibits bribery in all business dealings, in every country around the world, with both governments and the private sector.
- We maintain strong controls aimed at preventing and detecting bribery. This includes a rigorous process for appointing and managing third parties acting on GE Aerospace's behalf in business dealings.
- We keep accurate books, records, and accounts that correctly reflect the true nature of all transactions

## Red Flags to Report to Legal/Compliance

- Demands from a third party to receive its commission payment prior to winning a deal/contract
- Suggestions to direct business through a specific representative or partner due to a "special relationship"
- Requests to make a payment to a person who is not related to the transaction being discussed
- Commissions that seem too large in relation to the services provided
- Ambiguous "consulting fees" on invoices

## Your Role

- Never offer, promise, make, or authorize a payment or the giving of anything of value to anyone in order to obtain an improper business advantage. Consult the Business Courtesy Procedure before providing a business courtesy to an external party.
- Follow your business due diligence procedures and require that any third party that (1) represents GE Aerospace in promoting, marketing, and/or selling GE Aerospace products to potential customers or (2) works with GE Aerospace in the sale of GE Aerospace products to potential customers, is carefully selected and complies with policy.
- Do not make facilitation payments to speed up routine administrative actions. The only exception is if it is necessary to protect the health or safety of you or another employee.

# Working with Governments

We follow the highest ethical standards in conducting business with governments.

## The GE Aerospace Way

- We commit to comply with all applicable contract terms and conditions, laws, and regulations when working with governments.
- We are truthful and accurate when dealing with governments.
- We maintain controls and procedures that target our government business activities specifically to ensure compliance in this highly regulated environment.

## Integrity in Action

**Q:** A U.S. government engineer I met on a prior job has offered to brief me on the specific criteria the government will use to evaluate proposals on an upcoming procurement. He says he wants to make sure we get a fair shot at the contract. Can I accept his offer?

**A:** Not without finding out if he has been expressly authorized by the contracting officer to give you this briefing. If the engineer tells you that he has been authorized by the contracting officer to brief you, make a written record of the conversation.

## Your Role

- Government business is different — do not pursue government business without first engaging your business legal counsel.
- Be honest, complete and accurate when providing information to government entities.
- Review and understand requirements set forth by government customers before issuing proposals and/or accepting contracts.
- Do not help government customers to prepare bid specifications or to avoid procurement requirements.
- Do not deviate from government contract requirements, provide additional products/services, substitute the goods and services to be delivered, or provide customer concessions without written approval from the authorized government contracting official.
- Do not solicit or accept internal government information about its selection process or information about a competitor's proposal.
- Do not offer, promise, make or authorize the giving of anything of value to a government employee that is inconsistent with business guidelines.
- Never enter into discussions with government employees or people close to them about prospective GE Aerospace employment without the appropriate approval.
- In the U.S., certain employees must pre-approve personal political contributions for compliance with state and local “pay to play” laws. These employees are officers, directors, sales employees and their managers who seek U.S. state or local government contracts.



## Policy Spotlight

A government entity includes any federal, state or local government as well as any department, agency, or instrumentality thereof, such as a state-owned or state-controlled entity. This includes public international organizations (such as the UN and World Bank) and political parties.

## Help Corner

S&L Working with Governments Policy



## Policy Spotlight

Money laundering can occur in any business relationship that involves the transfer or receipt of funds, including from customers, suppliers, distributors, counterparties and agents.

## Help Corner

S&L Anti-Money  
Laundering Policy

# Anti-Money Laundering

We keep GE Aerospace safe from money-laundering activities.

## The GE Aerospace Way

- We only conduct business with reputable customers who are involved in genuine business activities and whose funds come from legitimate sources.
- GE Aerospace has implemented appropriate controls to prevent, detect and respond to money-laundering risks.

## Examples of Money Laundering Red Flags

- Attempts by a customer to provide false information to open an account
- Offers to pay in cash or overpayments followed by requests for refunds
- Orders, purchases or payments that are unusual or inconsistent with a customer's trade or business
- Unusually complex deal structures
- Unusual fund transfers to or from countries unrelated to the transaction
- Transactions that might have been structured to evade recording or reporting requirements

## Your Role

- Understand and watch out for red flags in your business activities and engagements. Monitor for red flags throughout the lifetime of the party's relationship.
- Follow Know Your Customer / Know Your Supplier policies to ensure all parties are screened against Watchlists and to receive timely due diligence.
- Take reasonable steps to understand and identify the party's beneficial owner, i.e. the individual with ultimate effective control over the legal entity.
- If handling incoming payments, understand who is making the payment, from where and why.
- Visit your compliance portal to learn of any local business-specific AML requirements (e.g. suspicious activity reporting).

# International Trade Compliance

We comply with all export control, economic sanctions and customs.

## The GE Aerospace Way

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- We comply with global trade controls and economic sanctions that prohibit us from doing business with certain countries, entities, and individuals.
- We comply with applicable customs requirements for the importation and exportation of goods.
- We maintain policies regarding State Sponsors of Terrorism (SSTs) that require government authorization to proceed with a transaction.

## Key Terms

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- **What is an import?** The movement of a physical item into one country from another country. All countries regulate the importation of goods and assess duties and taxes based on the value of the goods. Import and Customs requirements typically focus on physical items and not intangible transfers.
- **What is an export?** The movement of a physical item, software or technology from one country to another country. Many countries regulate exports based on the sensitivity of the items from a national security perspective. Exports can include emails, file transfers and conversations in addition to the shipment of goods.

## Your Role

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### Customs

- Use only approved Customs agents.
- Follow all business procedures relating to the import of goods.
- Provide accurate, complete and timely information to your business customs teams for import transactions including classifying goods.
- Ensure you fully comply with special program requirements before claiming reduced duty rates.

### Export Controls

- Use the export classification of goods, software and technology to determine if they require government authorization for export.
- Follow Know Your Customer / Know Your Supplier policies to ensure Watchlist screening.
- Ensure your export does not support prohibited end uses, such as nuclear proliferation and military end uses in certain countries.
- Do not do business with SSTs and/or sanctioned countries without approval.
- Do not cooperate with any boycott of Israel or any other restrictive trade practice.

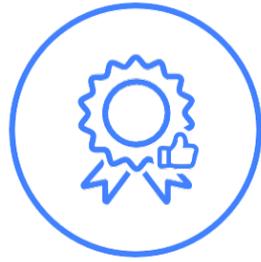


## Policy Spotlight

Request guidance from your business ITC leader or legal counsel if you are unsure how to proceed with your export/import transaction. Find them on the ITC portal.

## Help Corner

S&L International  
Trade Compliance  
Policy  
ITC Portal



## Policy Spotlight

If you observe any conformity defects or signs of deviations that could compromise the quality, safety, or regulatory compliance of GE Aerospace products or services, halt the process and immediately notify your business Quality, Safety or compliance leaders.

## Help Corner

S&L Quality Policy

# Quality

We adhere to a range of quality standards and requirements for our products and services.

## The GE Aerospace Way

- The quality of GE Aerospace products and services is a key part of our reputation and the basis of our competitive strength.
- Quality at GE Aerospace is everyone's responsibility.  
Proper quality:
  - Helps ensure the safety of our employees, customers, and those who our customers serve.
  - Helps drive customer satisfaction.
- GE Aerospace complies with all laws and regulations pertaining to the quality, safety, and performance of our products in all countries where GE Aerospace's products and services are offered.

## Integrity in Action

**Q:** During a meeting to review quality standards for specific engineering requirements, an employee became aware of delays for certain quality reviews. Frustrated, the employee contacts the site leader responsible for these reviews. The employee demands the site leader to clear the reviews by the next day and indicates that no further delays would be accepted. Should the site leader be concerned with the tone of the email and the pressure to speed up quality reviews?

**A:** Yes, non-conformances must be reviewed for acceptability

- these reviews cannot be skipped, despite the delays they may cause. Pressure from any employee to rush or circumvent required quality reviews is unacceptable. The site leader should escalate the behavior and raise an integrity concern as this is a potential policy violation.

## Your Role

- Follow your business policies, procedures, and manuals related to the quality, safety, and regulatory requirements of all products and services.
- Utilize only approved suppliers who meet, and consistently perform to, GE Aerospace's quality and safety requirements.
- Strive for continuous quality improvement by utilizing customer feedback, production trends, and Lean concepts.
- If you are involved with product or service design, manufacturing, distribution or servicing:
  - Create and maintain accurate quality records, such as test results, inspection reports, and manufacturing operation sheets. Never manipulate or falsify documents to show inaccurate information.
  - Do not bypass quality controls or take shortcuts that could compromise the quality, safety, or regulatory compliance of GE Aerospace products and services.
  - Do not misrepresent or falsify quality, safety or productivity metrics for internal or external reporting.

# Reporting and Recordkeeping

We create, maintain and report accurate financial and business records.

## The GE Aerospace Way

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- We prepare timely, accurate and complete financial information for use in reports to management, investors, regulators and other stakeholders.
- We ensure that management decisions are based on sound financial analysis and on complete facts with appropriate consideration of short- and long-term risks.
- We comply with all Company policies and applicable laws and regulations relating to the preservation of documents and records.
- We maintain effective processes and internal controls that fairly reflect transactions or events, as well as prevent or detect inappropriate transactions.

## Red Flags to Report

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- Financial results that seem inconsistent with underlying performance
- Circumventing review and approval procedures
- Incomplete or misleading communications about the substance or reporting of a transaction

## Your Role

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- Maintain effective processes and internal controls to fairly reflect transactions or events, as well as prevent or detect inappropriate transactions.
- Protect physical, financial and intellectual property assets.
- Maintain complete, accurate and timely records to appropriately reflect all business transactions.
- Create documents that are accurate and complete, and follow company policies in deciding when to retain and dispose of them.
- Do not misrepresent financial results or non-financial metrics (metrics on which operating decisions are often based) to meet performance goals.
- Never engage in inappropriate transactions, including those that knowingly misrepresent the reporting of other parties such as customers or suppliers.
- Seek the advice of your Controllershship team, compliance or ombuds if you become aware of a questionable transaction.



## Policy Spotlight

We faithfully reflect the economic and commercial substance of the Company's business activities, consistent with generally accepted accounting principles, standards, and regulations for accounting and financial reporting.

## Help Corner

S&L Reporting and Recordkeeping Policy



## Policy Spotlight

All GE Aerospace suppliers need to undergo due diligence before we can work with them. Only our Sourcing team has the authority to commit to supplier contracts.

## Help Corner

S&L Supplier Relationships Policy  
Supplier Integrity Guide

# Supplier Relationships

We base our relationships with suppliers on lawful and fair practices.

## The GE Aerospace Way

- We use only those suppliers who share our commitment to integrity, are qualified to provide the goods and services for which they are selected and comply with all applicable laws, regulations and expectations.
- All suppliers are required to comply with the Integrity Guide for Suppliers, Contractors and Consultants (the “Supplier Integrity Guide”).
- We safeguard both GE Aerospace and suppliers’ information, including confidential and proprietary information and personal data.
- We treat all suppliers with fairness and respect.

## Red Flags to Report

- Unsafe conditions in supplier facilities
- Supplier employees who appear to be underage or subject to coercion
- Suppliers’ apparent disregard of environmental standards in supplier facilities
- Suppliers with no history of conducting business in the particular jurisdiction they would be engaged for
- Suppliers who do not have sufficient relevant experience

## Your Role

- Follow your business process for supplier competitive bidding and onboarding due diligence review.
- Report any issues or concerns you observe related to suppliers’ facilities, treatment of workers, sub-suppliers and business practices.
- Protect confidential and proprietary information including, where appropriate, with a confidentiality agreement. Also safeguard any confidential information or personal data that a supplier provides to GE Aerospace.
- Avoid potential conflicts of interest when you select a supplier, and never accept improper gifts or other items of value.

# Acceptable Use

We use GE Aerospace Proprietary Information and Information Resources responsibly.

## The GE Aerospace Way

- We must use and protect information about our Company, our customers, our employees and our suppliers in an appropriate manner.
- Similarly, we must use and protect systems, devices, and other technology used to process Proprietary Information appropriately.

## What are GE Aerospace Information Resources?

- Any systems, devices, or other technology managed and approved by GE Aerospace to process, store or transmit Proprietary Information.
- All equipment owned or leased by GE Aerospace, including computers, mobile devices, and tablets.
- Other equipment, such as personally owned mobile devices, that has been approved for business (i.e. those in the Bring Your Own Device (BYOD) program).

## Integrity in Action

**Q:** I am away from my GE Aerospace laptop and need to get in contact with a colleague about a project we're working on. Can I email them from my personal email account?

**A:** No, you may not use your personal email account to conduct GE Aerospace business. This includes business-related communications with colleagues, customers or suppliers, as well as sending yourself any materials containing Proprietary Information. You must wait until you can regain access to your GE Aerospace email.

## Your Role

- Store Proprietary Information only in Information Resources.
- Only use your GE Aerospace identity (e.g., title or role, email address, credentials) where approved by policy and for business purposes.
- Return Information Resources when they are no longer required or have been replaced, and when you are leaving GE Aerospace.
- Limit non-business use of Information Resources, internet access, mobile data plan and email to a reasonable duration/ amount. Such use must not abuse Company time and/or resources; violate local law or any policies, standards or guidelines; or interfere with your work.
- Do not store, maintain, or back up Proprietary Information on personally owned or non-GE Aerospace computers, mobile devices, removable media or cloud storage.
- Do not use equipment or technology banned by GE Aerospace or a government entity.
- Do not use Information Resources for any unlawful purpose, such as accessing illegally distributed materials that are sexually explicit, or otherwise inappropriate.

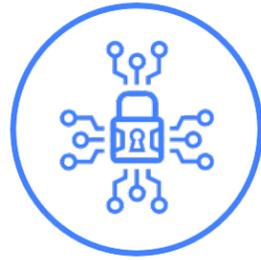


## Policy Spotlight

Raise any concerns about the appropriate use or protection of Proprietary Information or Information Resources at the [Security Portal](#) or by contacting your manager, business Ombuds, Legal, Privacy, Information Security or or Compliance Leader or other Open Reporting Channels.

## Help Corner

S&L Acceptable Use Policy  
Security Portal



## Policy Spotlight

Only install trusted applications on GE Aerospace Information Resources. Applications that are not provided or approved by GE Aerospace should not be used with GE Aerospace Confidential or GE Aerospace Highly Confidential Information.

## Help Corner

S&L Cyber Security Policy  
Security Portal

# Cyber Security

**We safeguard our systems, networks and devices from theft, loss or unauthorized access.**

## The GE Aerospace Way

- We seek to protect our networks, systems, devices, products, processes, services, and technology (Information Resources), and the extensive Proprietary Information they contain.
- We design Information Resources and products with security in mind and apply multiple layers of security controls.
- We monitor Information Resources in accordance with applicable law to protect the security of GE Aerospace and GE Aerospace Proprietary Information, to maintain operations, and to comply with applicable law and business obligations.
- We require third parties who process Proprietary Information on our behalf to implement information security controls that meet GE Aerospace standards, and we assess those controls.

## Tips for Keeping Resources Secure

- Secure physical copies of Proprietary Information and GE Aerospace devices when not in use
- Use strong passwords; don't share your password with anyone
- Avoid connecting to public or unsecure WiFi networks
- Avoid clicking on email links or opening attachments from unknown senders
- When posting information online, do not disclose GE Aerospace trade secrets, proprietary or other commercially sensitive information

## Your Role

- Use only the Information Resources for which you have authorization.
- Do not use personal email, unapproved devices or unapproved software to conduct business.
- Understand the terms of use for GE Aerospace's collaboration applications, including how the applications should be used and the data types that are allowed in each application.
- Ensure Proprietary Information shared with a third party is transmitted using an approved, secure method and appropriately protected by the third party.

# Intellectual Property

We secure GE Aerospace Intellectual Property rights to maintain our competitive advantage.

## The GE Aerospace Way

- We will defend our intellectual property (IP) rights from unauthorized use to preserve the value of our innovation and brand.
- We respect the valid IP of others and take appropriate steps to avoid violating any third-party rights.

## What Exactly is IP?

- IP includes inventions, manufacturing processes, brands, business plans, marketing documents and graphics, software, and product shapes. We protect this proprietary information with patents, trade secrets, trademarks, copyrights and designs.

## Integrity in Action

**Q:** I need to send proprietary information to other employees but am unsure if it requires a label. How do I know if information is at least -CONFIDENTIAL-?

**A:** Ask yourself, do I care if this information gets into the wrong hands? To put it another way, if this information was improperly disclosed, would there be a risk of harm to GE Aerospace's reputation or business? If you answer "yes" to these questions, then the information is at least -CONFIDENTIAL- information. If you have a question, ask your manager and/or your business IP counsel.

## Your Role

- Disclose any novel inventions created as part of your employment in a timely manner working with your business IP counsel.
- Classify, label, store and share all data, information and documents in accordance with Proprietary Information Classification, Labeling and Handling Policy, and ensure that access to Proprietary Information and documents is granted only to individuals with a legitimate need.
- Do not provide Proprietary Information to a third party without the proper internal approval and the necessary confidentiality agreement with the third party.
- Only use or distribute Proprietary Information for the benefit of GE Aerospace, and not for personal gain.
- Do not take, access, provide access to, or use any of Proprietary Information or other IP without authorization after leaving GE Aerospace.
- Do not bring, access, keep, share or use a third party's proprietary information, including proprietary information from a previous employer, without first consulting with and receiving prior approval from your business IP counsel.



## Policy Spotlight

GE Aerospace owns the IP created by its employees as part of their employment. We require employees to review and sign GE Aerospace's Employee Innovation and Proprietary Information Agreement (EIPIA).

## Help Corner

S&L Intellectual  
Property Policy

Managing Proprietary  
Information Procedure



## Policy Spotlight

Report any known or suspected risks or incidents involving Personal Information immediately at the [Security Portal](#), or to your manager, Business Privacy Leader, or through Open Reporting channels.

## Help Corner

S&L Privacy Policy  
Commitment to  
the Protection of  
Personal Information

# Privacy

We respect individual privacy rights.

## The GE Aerospace Way

- We collect, handle and protect Personal Information responsibly. We do this in compliance with applicable privacy laws and with *GE Aerospace's Commitment to the Protection of Personal Information*.
- We process Personal Information lawfully, fairly and transparently, and provide for individual rights, consistent with applicable law.
- We limit processing of Personal Information to the minimum required to meet its specific legitimate business purposes.

## What Exactly is Personal Information?

- Personal Information is any information relating to a directly or indirectly identifiable person. Examples of Personal Information include name, SSO, home address, national identifier, and pay and benefits information.

## Integrity in Action

**Q:** We received permission to use this customer personal information as part of our research, can we use it for marketing as well?

**A:** No. Personal Information authorized for one purpose cannot be used for a new, incompatible purpose.

## Your Role

- Limit your access to or processing of Personal Information only to what is necessary for specific legitimate business purposes.
- Keep Personal Information only as long as necessary. Follow applicable retention schedules and secure deletion procedures provided by your business and/or function.
- Consider privacy early in the design of any system, application, process or product.
- Protect Personal Information processed by suppliers by implementing appropriate contracts, security assessments, Privacy by Design, and secure transmission with those suppliers.

# Conflicts of Interest

We avoid conflicts of interest.

## The GE Aerospace Way

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- Always make business decisions based on what is objectively best for GE Aerospace, never what is personally best for you.
- Do not personally take for yourself any opportunities that GE Aerospace could have an interest in that are discovered using GE Aerospace position(s), information or property.
- Do not use GE Aerospace resources, intellectual property, time or facilities for personal gain.
- Make sure to avoid any actual, potential or perceived conflict of interest with GE Aerospace. When avoidance is not possible, or if you are unsure, you have a duty to disclose.

## Examples of Potential Conflicts to Disclose

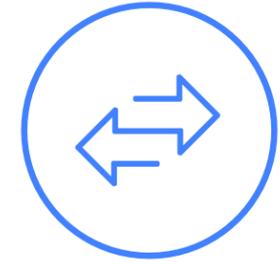
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- Financial interests in a company where you could personally affect, or financially benefit from, GE Aerospace's business with that company
- Working with, hiring or supervising others with whom you share a close personal relationship
- Outside employment (paid or unpaid)
- Outside board memberships
- Gifts from suppliers

## Your Role

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- Disclose actual, potential or perceived conflicts of interest electronically using the eConflicts of Interest questionnaire when you join GE Aerospace and update it when requested.
- Update your questionnaire before entering into any situation that poses a potential or perceived conflict.
- If you work in a country where an approved alternative method for disclosing potential conflicts is in place, then you may submit a disclosure in writing to (i) your manager and (ii) HR manager or business legal counsel or compliance leader.



## Policy Spotlight

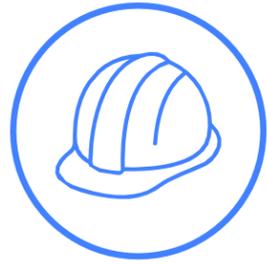
An affirmative disclosure does not necessarily mean that there is an actual conflict or that the activity is improper. It is important to fully disclose so GE Aerospace can help you avoid any situations that may violate the Conflicts of Interest Policy.

## Help Corner

S&L Conflicts of Interest Policy

Conflicts of Interest Questionnaire

Business Courtesy Procedure



## Policy Spotlight

Stop work and alert management or EHS leadership if you are aware of unaddressed hazards or standards that are not being followed.

## Help Corner

S&L Environment,  
Health and Safety Policy  
EHS Portal

# Environment, Health and Safety

**We protect our people and the communities in which we operate.**

## The GE Aerospace Way

- We strictly comply with all the environment, health, and safety (EHS) laws that apply to our operations.
- We develop and follow safe work practices to ensure workplace safety and prevent injuries.
- We install, maintain, and monitor environmental controls to ensure our emissions meet legal limits.
- We assess the EHS risks of any new activity—whether designing a new product, selling in a new market, building a new factory, or buying a new business—and prepare our teams and sites accordingly.

## Examples of EHS Red Flags to Report

- Failure to obtain or comply with regulatory permits
- Deviations from written work practices that bypass or remove EHS defenses or compromise safety
- Lapses in security or emergency preparedness
- Inadequately maintained tools or equipment
- Lack of or faulty protective equipment, including machine guards or personal gear
- Unsafe driving
- Failure to use lock-out/tag-out (LOTO) procedures or fall protection
- Improperly shipped wastes or hazardous products
- Unsafe offsite situations, such as at customer or project sites

## Your Role

- Understand and comply with all EHS training assigned to you.
- Follow EHS processes and procedures to find and fix EHS concerns at your site. When in doubt, ask your EHS leader.
- Question unsafe or improper operations you observe anywhere you work, including at GE Aerospace facilities, customer and project sites.
- Stop any work which seems improper, unsafe, or about which you are uncertain.

# Insider Trading and Stock Tipping

We ensure proper use and protect the confidentiality of material non-public information.

## The GE Aerospace Way

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- We do not use or share material non-public information for any personal benefit.

## Examples of Material Information

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- Revenue, earnings, margin, cash flow or other financial results or forecasts
- Significant lawsuits, claims, or investigations
- Changes in senior leadership
- Large, transformative acquisitions, dispositions, or reorganizations
- Audit results
- Key drivers of business performance

## Integrity in Action

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**Q:** During a team meeting, I learned that GE Aerospace is planning to acquire another company. Can I buy stock in that company before the acquisition is announced? What about buying GE Aerospace stock?

**A:** No and no. If you learn that GE Aerospace is considering buying a company or entering into a major purchase contract, assume the information is non-public until after GE Aerospace or the counterparty has publicly announced the transaction and the market has had time to absorb the information.

## Your Role

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- Never buy or sell securities (such as stocks, bonds or derivatives) of GE Aerospace or any other company, while you are aware of non-public information that could affect the price of those securities (insider trading).
- Do not recommend or suggest that anyone else buy or sell the securities of any company — including GE Aerospace — while you have material non-public information about that company (stock tipping).
- Avoid sharing non-public information with anyone outside GE Aerospace unless it is necessary for business activities and proper controls are in place (such as a non-disclosure agreement with a supplier).
- Refrain from discussing non-public GE Aerospace business with family and friends.
- Do not serve as an independent consultant or expert outside of GE Aerospace on business matters within the scope of your employment.



## Policy Spotlight

GE Aerospace policy establishes standards for employees and others who obtain material non-public information and prohibits insider trading and stock tipping.

## Help Corner

S&L Insider Trading and Stock Tipping Policy



## Policy Spotlight

If you see or sense that something is not right, say something. You can report security concerns or suspicious events to a security leader, HR, legal/compliance, ombudsperson, or on the [Security Portal](#).

## Help Corner

S&L Security Policy  
Security Portal

# Security

**We work to keep our global operations safe and secure for those working for us and with us.**

## The GE Aerospace Way

- We want all employees and contractors to feel physically safe and secure while on the job – whether at a work location or when traveling on behalf of the Company.
- We communicate as appropriate about prevention, emergency response and business continuity with the GE Aerospace community, government officials, the media and the public.
- Our 24/7 global security operation teams are prepared to assist with all security concerns that you may have.

## Tool for Traveling Securely: Your Emergency Contact

- Before traveling, we recommend you enter or update the emergency contact information in your GE Aerospace travel profile. If there is any type of event (natural or man-made) that could cause a risk to you while traveling, leadership wants to check that you are safe. If we cannot get in touch with you, we will reach out to your emergency contact while we continue to monitor your safety.

## Integrity in Action

**Q:** I saw a contractor taking pictures while in the GE Aerospace area. She may have permission, but I am not sure. What is the best thing to do?

**A:** Immediately contact a local security guard or a site security leader to report what you saw. In most sites, picture taking is not allowed or must be carefully supervised with permission.

## Your Role

- Create and maintain a safe working environment.
- Always be aware of your surroundings whether you are in a GE Aerospace location, a customer site or a public place.
- Adhere to all entry/exit procedures. Wear your badge and ensure others do too.
- Make business travel arrangements through GE Aerospace Travel and comply with the T&L Policy requirements.

# Open Reporting

**We act as the voice of integrity.**

## The GE Aerospace Way

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- GE Aerospace promotes an open environment in which employees are encouraged to raise integrity concerns through a variety of channels and are comfortable doing so without fear of retaliation.
- GE Aerospace strictly prohibits retaliation for raising a concern or participating in an integrity investigation.
- GE Aerospace keeps concerns and related parties strictly confidential, to the extent possible consistent with a full and fair investigation. Investigators will release details only on a “need to know” basis.

## How to Raise an Integrity Concern

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You can choose to speak to someone about a potential integrity issue in person, by phone or in writing.

### Available channels include:

- Managers
- Human Resources
- Legal & Compliance
- Ombuds
- The Board of Directors
- Anonymously at [compliance.geaerospace.net](https://compliance.geaerospace.net)

Nothing in this policy prevents you from reporting potential violations of law to relevant government authorities.

## How Concerns are Investigated

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GE Aerospace thoroughly examines every integrity concern. During the investigation process, GE Aerospace:

- Forms an independent and objective investigation team.
- Obtains the facts through interviews and/or the review of documents.
- Reaches conclusions, whenever possible, from the facts the team is able to obtain.
- Recommends corrective action, if necessary.
- Provides the person who raised the original concern (if that person is known) with feedback on the outcome, while maintaining the confidentiality and privacy of all involved in the matter.



## Policy Spotlight

You do not need to be certain that a violation has occurred, but rather should raise a concern when you have a good faith belief that something improper, a violation of law or policy, has occurred.

## Help Corner

S&L Open Reporting Policy



GE Aerospace

