

# FAIR COMPETITION POLICY

We believe in a free and competitive marketplace. GE Aerospace is dedicated to compliance with antitrust and competition laws in all its activities. These laws are aimed at prohibiting agreements and behaviors that undermine competition. Failure to do so may include fines, reputational harm, and even jail time.

## What to Know

- To ensure a fair and competitive marketplace, we must avoid actions, agreements or relationships that limit or prevent competition in any way. Examples of anti-competitive activities include price fixing, bid rigging, sharing competitively sensitive information, and allocating markets or customers.
- Improper agreements do not have to be formal or in writing to violate competition laws. Unspoken or implied agreements – simply the appearance of unfairness or deception – can cause legal or reputational harm.
- Competition laws can be far-reaching. Often, the competition laws of a country or region apply to activity beyond its own borders. GE Aerospace activity may be subject to competition laws outside the country or region where the commercial activity takes place.

## How to Comply

Be mindful of the role you play in our pro-competitive business model. Here are ways to help us do so:

- **Do not contact competitors without a legitimate business purpose** (i.e., a buy-sell relationship, potential joint venture, or other pro-competitive arrangement). Limit discussions only to what is necessary for the legitimate business purpose.
  - Follow [established procedures](#) for reporting, conducting and documenting contacts with competitors.
  - Consult the [Guide to Competitor Contacts](#) for additional help.
- **Do not enter into formal or informal agreements with [competitors](#)** to:
  - Fix prices or other terms of sale;
  - Coordinate bids or decisions to bid;
  - Allocate markets, customers, territories, products, or services;
  - Limit output or capacity;
  - Set employee wages, or not hire each other's employees;
  - Limit research and development;
  - Boycott customers or suppliers; or
  - Otherwise hinder the competitive process in a way that harms customers.



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- **Do not provide, receive, or exchange competitively sensitive information directly with a competitor** (or their agent).
  - While the general gathering of [competitive intelligence](#) is permissible, only use competitive intelligence obtained by lawful and ethical means from public, [appropriate sources](#).
  - For competitive intelligence obtained or shared by a customer or other third-party, consult the [Guide to Competitive Intelligence](#) on how to handle it appropriately.
- **Seek approval before participating in trade or professional associations.** These associations often bring together groups of competitors, which presents competition law risks.
  - Follow [established procedures](#) for requesting participation before you become involved.
  - Do not discuss competitively sensitive information while at a conference, trade association meeting or similar industry gathering. This includes prices, future strategies, bidding, intellectual property, or any other confidential information that could be used to make strategic commercial decisions.
    - If you are at such an event and the discussion turns to one of the above impermissible topics: make your objection known and recorded in the minutes, exit the conversation, and contact GE Aerospace legal counsel.
    - Consult the [Guide to Trade Associations](#) for additional help.

## Get Help

- Contact GE Aerospace legal counsel and/or competition law focal point when any of the following apply:
  - If you believe that contact with a competitor was, or could have appeared to be, improper, or you wish to create a record in the event a legitimate contact is later questioned,
  - If you are contacted by any competition law enforcer making any request for information relating to GE Aerospace's or anyone else's business,
  - If you receive a summons, legal complaint, subpoena, or any similar legal document relating to antitrust or competition law,
  - If you receive a customer or competitor complaint, relating to competition law, about any GE Aerospace business activities, or
  - If you have a question about competition law, or are not sure whether there is a competition law issue.
- Understand and follow required procedures and guidelines on competitor contacts, handling competitive intelligence, and participating in trade associations.



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- Understand if GE Aerospace uses certain business models or engages in commercial practices that can carry added antitrust risk, including:
  - Bidding in a consortium
  - Sales through a distributor, including dual distribution
  - Exclusive arrangements
  - Bundling discounting
  - Loyalty discounts
  - Below-cost pricing

If you or GE Aerospace participate in any of the above, learn GE Aerospace's procedures for that model and when you should seek legal review. This is not an exhaustive list – you should be familiar with other commercial practices within our Company that may need antitrust review.

- Understand policy and procedures on responding in the event of an unannounced inspection by a competition law regulator.
- Raise a compliance concern right away if you become aware of a potential violation of this policy. You can raise the concern to your manager or through other [Open Reporting channels](#).

## Penalties for Violation

Employees who violate the spirit or the letter of GE Aerospace's policies are subject to disciplinary action up to and including termination of employment if allowed under applicable law. In addition, if laws are violated, employees or the Company may be subject to criminal penalties (fines or jail time) or civil sanctions (damage awards or fines). We could also lose government contracting privileges and export privileges.

## Definitions

- **A competitor** is any business that sells competing products or services (or is developing products to compete with GE Aerospace products or services). This applies even if GE Aerospace also has some other commercial relationship with, or minority ownership interest in, that party.
- **Competitive intelligence** is the gathering of information about competitors' activities, methods and strategies. Examples include prices; bids; customers, suppliers, sales territories or product lines; terms or conditions of sale; production, sales capacity or volume; costs, profits or margins; sales, marketing or development strategies for products or services; distribution methods.
  - **Inappropriate sources of competitive intelligence** include competitive sensitive information from a competitor or someone acting on their behalf; competitive information that would breach a third party's (e.g., customer's)



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confidentiality obligations with a competitor; confidential information or information GE Aerospace has a legitimate reason to believe is confidential; information obtained by illegal or unethical means.

- **Appropriate sources of competitive intelligence** include websites, public postings, and third-party industry guides. In some cases, customers or suppliers may also share competitively sensitive information (assuming confidentiality does not prevent sharing), but be careful about accepting information from a customer if it isn't clear they are permitted to share it.

