



June 2019

Textron Code of Conduct for Suppliers and Other Business Partners

Textron (including its business units) expects suppliers, consultants, sales and service representatives, agents, distributors and other business partners (collectively, “Business Partners”) to conduct business in accordance with the highest ethical standards. Textron’s Business Partners are an extension of the company and must not conduct business in a manner that could damage Textron’s reputation or cause Textron to be in violation of any law or regulation.

Textron requires its Business Partners to follow this Code of Conduct. Please make your employees aware of it.

Business Partners must:

- conduct business in full compliance with all applicable laws and regulations
- avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Textron
- safeguard proprietary and confidential information disclosed by Textron and physical property or personal data of Textron and its employees and customers which is in their care or possession, and use any such information only for the business purpose for which it was provided
- maintain accurate and complete business records
- establish and maintain fair employment practices, including complying with laws that prohibit harassment, employment discrimination, human trafficking and child or forced labor
- maintain a safe and healthful workplace for their employees free of illegal drugs or controlled substances
- protect the health, safety and welfare of those who may be affected by their activities by complying with all applicable environmental and health and safety laws, regulations and directives
- not give or receive business gifts unless of nominal value and permitted by law, regulation and the rules and standards of the recipient’s organization, and never in cash (or cash equivalent such as a prepaid credit or debit card)

- provide meals and entertainment to customers and others only if permitted by applicable laws and regulations, and, to the extent legally permissible, in a manner that is reasonable and customary, never lavish or inappropriate
- never pay or accept bribes, kickbacks or other improper payments of money or anything of value or make facilitation payments to speed up the performance of a function or activity to which the Business Partner is legally entitled (for example, the release of goods held in customs at a port, the issuance of permits or licenses or the provision of utilities such as electricity) even in locations where such activities may not violate local law
- act with honesty and integrity and in compliance with all applicable laws and regulations in doing business with government officials in any country, including personnel employed by government-controlled or state-owned enterprises
- not engage in anti-competitive behavior such as price-fixing, bid-rigging and other forms of illegal collusion by businesses
- obtain Textron's written approval before using Textron's name or logo in any advertising, marketing materials or other publicity
- not use material, non-publicly disclosed information obtained in the course of their business relationships with Textron as a basis for trading or enabling others to trade in securities
- co-operate with Textron by providing information and certifications upon request
- use reasonable efforts to promote among their business partners adherence to this Code of Conduct, and exercise due diligence to prevent and detect corruption in all business arrangements
- provide their employees with avenues for raising legal or ethical concerns without fear of retaliation

If a Business Partner enters into a contract with Textron that contains additional or more stringent terms and conditions, those terms and conditions shall prevail.

If you have any questions on this Textron Code of Conduct for Suppliers and other Business Partners or need to report a suspected or known violation, you may contact Textron at 1-800-892-9871 (Toll free in U.S. and Canada) or 1-401-457-6006, or at <http://www.reportlineweb.com/textron>.