

## Tur-Bo Jet Products Code of Conduct and World Class Business Pledge

Tur-Bo Jet Products is dedicated to conducting business consistent with the highest standards of business ethics, conduct and quality. In doing so, we ensure quality, safety, and effectiveness of products and services globally. We, Tur-Bo Jet Products, have an obligation to our interested parties: business owners, employees, stakeholders, customers, suppliers, community, creditors, government agencies/regulators and others whom we interact with to deliver the highest product quality on time and to be honest, fair, and forthright in all business activities. We work diligently across our organization to reinforce the fundamental premise that every employee and supplier carries a share of the responsibility for the conduct and success of our company.

### A) Code of Conduct:

#### 1. Compliance with laws:

- i. Supplier personnel and operations shall operate in full compliance with the laws of their respective countries and with all other applicable laws, rules, and regulations. Additionally, suppliers will ensure that products, services, and shipments for Tur-Bo Jet Products adhere to all applicable international trade compliance laws, rules, and regulations.

#### 2. Labor:

- i. Suppliers shall uphold the human rights of workers and treat them with dignity and respect including the following:
  1. Shall employ only workers who meet the applicable minimum legal age requirement. Suppliers shall also comply with all other applicable child labor laws according to local regulations.
  2. Shall not use any indentured or forced labor, slavery, or servitude. Tur-Bo Jet Products will not tolerate any instances of human trafficking or other forced labor.
  3. Suppliers Operations shall set working hours, wages, and overtime pay in compliance with all applicable laws and that meet local industry standards.
  4. Shall treat employees with dignity and respect and will not engage in or permit corporal punishment, threats of violence, or other forms of harassment whether including but not limited to gender, race, color, religion, ethnicity, age, sexual orientation, national origin, disability, or any other legally protected characteristic.
  5. Shall employ workers on the basis of their ability to do the job, not on the basis of their personal characteristics or beliefs including but not limited to race, color, gender, nationality, religion, age, maternity, or marital status.

#### 3. Health and Safety:

- i. Tur-Bo Jet Products is committed to being a global leader in safeguarding the health and safety of our employees, our supplier's employees, and to protecting the environment. As such, Tur-Bo Jet Products expects our suppliers to comply with the following:
  1. Shall ensure a safe work environment and minimize physical and chemical hazards through proper design, engineering, and administrative controls, preventative maintenance, and safe work procedures, as well as ongoing safety training.
  2. Shall provide workers with appropriate personal protective equipment where hazards cannot be adequately controlled by other means.
  3. Shall provide and properly maintain physical guards, interlocks, and barriers where machinery presents an injury hazard to workers.
  4. Shall minimize the impact of emergency situations through the implementation of emergency plans and response procedures.

5. While suppliers are on site at a Tur-Bo Jet Products location or at a Tur-Bo Jet Products customer location on behalf of Tur-Bo Jet Products, suppliers shall comply with Tur-Bo Jet Products safety policy, EHS handbook, and any site-specific requirements.
4. Community:
  - i. Tur-Bo Jet Products strives to make socially responsible decisions that positively affect our global communities and we strive to be good corporate citizens. Tur-Bo Jet Products expects this same commitment from our business partners, customers, and suppliers.
5. Privacy and Cyber Security:
  - i. Tur-Bo Jet Products recognizes the importance of cyber security in safeguarding our business and interested parties from evolving digital threats. Suppliers shall comply with all applicable below.
    1. Suppliers shall commit to protecting confidential and proprietary information through appropriate physical and electronic procedures.
    2. Shall comply with applicable privacy, information, security laws and regulatory requirements.
    3. Shall commit to protecting Technology (IT) systems and Operation Technology (OT) systems to avoid unauthorized access or distribution of systems and data.
6. Media Communication:
  - i. With its rapidly growing relevance to business activity, social media is emerging as an important communications tool both within and outside the company. While these tools create new opportunities for communication and collaboration, they involve responsibilities for Tur-Bo Jet Products and our suppliers.
    1. Suppliers participating in social media for business purposes must have written authorization to represent Tur-Bo Jet Products and ensure that any content shared publicly complies with this code of conduct and relevant company confidentiality and disclosure policies, as well as laws governing copyright and fair use of copyrighted material owned by others.
7. Environment:
  - i. At Tur-Bo Jet Products environmental considerations are an integral part of our business practices and the production of world-class products. Suppliers shall comply with all applicable environmental laws and regulations including the following:
    1. Shall maintain all required environmental permits, registrations, and follow the operations and reporting requirements of such permits.
    2. Shall comply with regulated substance specifications and with any applicable laws and regulations prohibiting or restricting the use or handling of specific substances.
    3. Shall endeavor to reduce or eliminate solid waste, wastewater, and air emissions by implementing appropriate conservation measures in their production, maintenance, and facility processes.
    4. Shall manage, control, treat and or dispose of non-hazardous solid waste, wastewater, and or air emission generated from operations as required by applicable laws and regulations before discharge.
8. Ethics:
  - i. Tur-Bo Jet Products commits to the highest standards of ethical conduct when dealing with its employees, suppliers, and customers. As part of that commitment, we expect the following of our suppliers:
    1. Shall prohibit any and all forms of corruption, extortion, and embezzlement by its employees, officers, directors or agents.
    2. Shall adhere to standards of fair business, advertising, and competition.

3. Shall not offer or accept bribes or other means to obtain undue or improper advantage.
  4. Shall accurately record and disclose information regarding their business activities, structure, financial situation, and performance in accordance with applicable laws and regulations as well as prevailing industry business practices.
  5. Shall respect intellectual property rights and safeguard customer information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.
  6. Shall implement and comply with Equal Employment Opportunity laws and regulations.
  7. Shall implement processes as well as procedures and exercise due diligence to detect and avoid counterfeit parts.
  8. Shall implement a comprehensive business continuity plan throughout its operations and supply chain to preserve the safety of workers, protect physical property from loss and damage, safeguard intellectual property, prevent interruptions in the manufacturing process, and ensure the integrity of shipments from the point of origin.
  9. Shall implement processes to address the confidentiality protection of an employee who in good faith raises a concern, makes a report, or assists with an investigation related to potential ethical or criminal violations.
  10. Tur-Bo Jet Products is committed to ensuring that the products it sells do not incorporate “conflict minerals” sourced from entities that are not DFARS compliant. Tur-Bo Jet Products requires its suppliers to:
    - a. Perform sufficient due diligence into their respective supply chains to determine whether products sold to us contain tin, tantalum, tungsten or gold, and if so whether and to what extent those metals are sourced from conflict free smelters, report to Tur-Bo Jet Products the results of such due diligence to enable Tur-Bo Jet Products to comply with its legal obligations and policy goals.
    - b. Commit to being or becoming conflict free so that any such metals are sourced only from conflict free smelters.
9. Anti-Corruption:
- i. Tur-Bo Jet Products is committed to complying with anti-corruption laws that prohibit bribes, kickbacks, or other corrupt actions to obtain or retain business or obtain any improper advantage. All suppliers are expected to comply with applicable anti-corruption laws while conducting business on behalf of Tur-Bo Jet Products. Suppliers are prohibited from directly or indirectly receiving any form of bribe, kickback, or other corrupt payment, to or from any person or organization, including government agencies or officials, private companies, or employees of those private companies.
10. Gifts and Entertainment:
- i. Tur-Bo Jet Products recognizes that it is customary for some suppliers, customers, and other business associates to occasionally give small gifts or offer modest business entertainment to those with whom they do business. It is important however that these gifts and entertainment events do not affect an employee’s business judgment or give the appearance that judgment may be affected. When doing business with or conducting business on behalf of Tur-Bo Jet Products, the supplier may for legitimate business purposes: (i) offer gifts or entertainment to suppliers, customers, or other business associates; or (ii) accept gifts or entertainment offered by suppliers, customers, or other business associates provided however that in each instance the gift or entertainment:
    1. Is unsolicited.
    2. Is not a bribe, kickback, or other legal or illicit payment.

3. Is not given in exchange for any consideration.
  4. Would not embarrass Tur-Bo Jet Products if disclosed publicly.
  5. Does not create the appearance (or an actual or implied obligation) that the gift giver is entitled to preferential treatment, an award of business, better prices, or improved terms of sale.
- ii. Any supplier that violates the provisions of this section 7 when conducting business with or on behalf of Tur-Bo Jet products risks immediate loss of all existing and future Tur-Bo Jet Products business.
- B) Compliance Monitoring:
1. Suppliers will allow Tur-Bo Jet Products and or any of its representatives or agents access to its facilities and all relevant records associated with the products and services provided to Tur-Bo Jet Products. The supplier and Tur-Bo Jet Products will establish a mutually agreeable date and time for access. This is with the understanding that risks to Tur-Bo Jet Products business may require immediate access to the products, services, and associated records, and will need to accommodate Tur-Bo Jet Products access as needed.
- C) Application to subcontractors:
1. This code also applies to any sub-contractors to the supplier providing goods or services to the supplier. This code shall be cascaded down to all sub tier sub-contractors. The supplier is fully responsible for ensuring compliance by any such subcontractor(s) as if it were the supplier itself. Tur-Bo Jet Products reserves the right to audit the supplier's sub-contractors for compliance with Tur-Bo Jet Products code and supplier will accommodate Tur-Bo Jet products audit as required.
- D) Event of Violation:
1. Supplier shall promptly report (written) to Tur-Bo Jet Products notice of breach of this code and implement a corrective action plan to cure the non-compliance within a specified time period. If the supplier fails to meet the corrective action plan commitment, Tur-Bo Jet Products may terminate the business relationship, including suspending placement of future orders and potentially terminating current production. Tur-Bo Jet Products reserves the right to hold suppliers responsible for reasonable costs of investigating non-compliance.

We Tur-Bo Jet Products work diligently across our organization to reinforce the fundamental premise that every employee, supplier, and interested party carries a share of the responsibility for the code of conduct and highest standard of ethical business practices to support the success of our company.