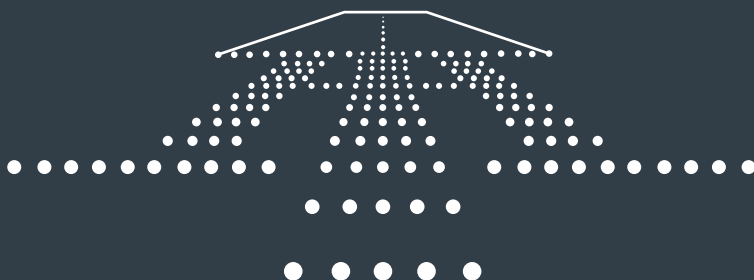


2019 edition

Meggitt Ethics & Business Conduct



Guiding your way

Contents

- 1 Letter from the Chief Executive
- 2 Guiding principles
- 4 Ethics and Business Conduct Policy
- 8 Code of Conduct
- 12 Anti-Corruption Policy
- 24 Key contacts

Policies updated by the Board 28 July 2016.

Tony Wood
Chief Executive



Dear Colleague,

I am pleased to introduce to you the Meggitt Ethics Guide. Within these pages you will find our Ethics and Business Conduct Policy, our Code of Conduct and our Anti-corruption Policy. It is important that each of us understands our responsibilities and shares the commitment to the values embodied in them.

Meggitt is a global organisation and we have the strongest commitment to ethical behaviour in every part of the world. We each come to Meggitt from different life experience, backgrounds, cultures, and we speak many languages. Together, we deliver products and services to public and private customers on every continent.

Honesty, integrity and respect are at the heart of the way we do things at Meggitt. Understanding these principles—and putting them into action every day is the key to our success. It is what our customers expect and it is what we expect of ourselves. This Guide is very important to help us understand those values.

If you have any questions or concerns about anything in this Ethics Guide, please speak up. People in the company are ready to help you. Their names and contact information are listed at the end.

As we continue to grow it is vital that we each behave in a way that maintains and builds our reputation. Thank you for the contribution that you make to our success and for embracing our Code of Conduct.

Tony Wood.

Honesty, integrity and respect are the foundation of how we conduct business at Meggitt.

Honesty

We strive to behave in a manner that is transparent and open. In every country where we operate, we follow the laws and regulations, honouring both their letter and spirit.

At the heart of all of our relationships, with customers, suppliers, regulators, partners, investors, and with each other, is our commitment to fairness and truth. Acting on this commitment is how we continue to build trust and the positive reputation of our company.

Integrity

We are committed to delivering the highest quality products and services. Recognising that we live in a competitive world, we will deal fairly and impartially in all transactions. We do these things consistently and continuously. That means thinking carefully about the consequences of our decisions and asking for help in making those decisions. By staying true to our values when we are faced with difficult situations we will make the right choices.

Respect

We treat each of our stakeholders with respect at all times. That includes respect for our co-workers and the communities in which we operate. We embrace the diversity of background, experience and family within our organisation, ensuring that Meggitt is a place where everyone has the opportunity to flourish. We treat others as we would like to be treated.

Ethics and Business Conduct Policy



Why is this important to us in Meggitt?

Meggitt is firmly committed to honesty, integrity, and respect for others in all of our business relationships, including those with customers, suppliers, communities and amongst our employees.

Our Ethics and Business Conduct Policy is our public statement that at Meggitt we are committed to doing the right thing. For all of us who work here and those who work with us, this policy explains our commitment to acting with integrity.

What is expected of me?

If you have any questions or concerns, speak up. If you are ever worried that someone might be working against these principles, share your concerns. If there is something you don't understand, ask questions. Doing nothing is as unethical as doing the wrong thing.

In Meggitt we have a well-established Escalation Policy for helping to find answers. Your site Ethics Coordinator can provide you with a copy. Your site Ethics Coordinator is also there to help. Please don't hesitate to share any questions or concerns you may have with them.

Meggitt PLC and all subsidiary companies will conduct business fairly, impartially, and in full compliance with all applicable laws and regulations, and guided by:

- the Common Industry Standards adopted by the Aerospace and Defence Industries Association of Europe (ASD); and
- the Global Principles adopted by the International Forum on Business Ethical Conduct (IFBEC).

Meggitt is firmly committed to integrity, honesty, and respect for others in all its business relationships; including those with customers, suppliers, communities where we conduct business, and amongst its employees. The highest standard of ethical behaviour is expected from Meggitt employees, directors and from those who act on the Company's behalf in the performance of their professional responsibilities and in their own personal conduct.

A Code of Conduct has been adopted by the Board along with related policies to guide the conduct of our businesses; the people who work at Meggitt; and others with whom we work. These policies and procedures include Meggitt's Anti-corruption Policy; Corporate Responsibility Policy; and Standards of Business Conduct for US Government Contracting.

The company has implemented an Ethics and Business Conduct Programme across the Group which includes:

1. Training and awareness presentations;
2. The names and contact information for people who can help employees;
3. An independently operated Ethics Line for raising questions or concerns;
4. Other policies and procedures to be adopted from time to time to assist in the implementation of this policy;
5. Regular monitoring of the Ethics and Business Conduct Programme and of compliance with the Code of Conduct.

This policy, our Code of Conduct and related policies will be provided to all employees and directors. They will also be publicly available on Meggitt's website: www.meggitt.com

The Board delegates responsibility for oversight of the Ethics and Business Conduct Policy to the Ethics and Trade Compliance Committee. The Chief Executive and Executive Director, Commercial and Corporate Affairs will have executive responsibility and will report at least twice a year on these matters to the Ethics and Trade Compliance Committee and at least once a year to the full Board.

Strategic Business Unit Presidents and business unit leaders are responsible for local implementation of this policy.



Code of Conduct

Why is this important to us in Meggitt?

Our Code of Conduct applies to everyone in Meggitt—to all Meggitt employees, officers and members of the Board.

We share our Code, and the whole Ethics Guide, with our partners, customers and suppliers. We will only work with other organisations and individuals who share our commitments to Honesty, Integrity and Respect for others.

What is expected of me?

In the Code you will find a clear set of shared expectations that apply to each of us. We all do our part by taking responsibility for the success of Meggitt and that means behaving safely, ethically and consistently with relevant laws, regulations and Meggitt policies.

If you are in doubt as to how the Code of Conduct applies to you, or on any aspect of it, then please talk to your Manager or

your site Ethics Coordinator. You can also seek the advice of Meggitt Legal Counsel or the Vice President, Ethics and Business Conduct any time you have questions or concerns. Alternatively, use the free phone numbers that are listed at the end of the Guide to reach our Ethics Line.

Throughout each year we provide regular training on topics such as “Preventing Harassment in the Workplace”; “Working Together: Promoting Mutual Respect” and “Diversity: Another Perspective”. We also regularly update our training on the Code of Conduct as well as Health and Safety and Trade Compliance. We welcome feedback on any training session.

Meggitt PLC and all subsidiary companies will conduct business fairly, impartially, and in full compliance with all applicable laws and regulations. We are firmly committed to integrity, honesty and respect for others in all our business relationships, including those with customers, suppliers, communities where we conduct business, and amongst employees. The highest standard of ethical behaviour is expected from Meggitt employees, directors, and from those who act on Meggitt's behalf in the performance of their professional responsibilities and in their own personal conduct.

Meggitt's Code of Conduct promotes "doing the right thing" and "doing things right" so that we maintain our personal and business integrity. No Code of Conduct can address every possible situation. Where a specific action is not mentioned or you are not sure what action to take, you should always seek guidance. The Code will help you identify the right resources and the people who can help you.

Employees, directors, and those who act on behalf of Meggitt, in accordance with Meggitt's related policies and procedures, should:

- Read and regularly review this Code of Conduct;
- Participate in training to learn about business ethics, compliance, laws and regulations that affect our business;
- Be alert to any Code violations, illegal or unethical conduct and promptly report them to management or other appropriate officials. If you believe that our Code of Conduct or related policies are being violated, you have a responsibility to speak up;
- Raise questions or concerns about the business and follow them through to appropriate conclusion according to Meggitt's Escalation Policy, which is available to all employees from your site Human Resources organization or your on-site Ethics Coordinator;
- Comply with all applicable laws and regulations;
- Deal fairly and impartially in all transactions;
- Not participate in activities that may raise questions as to Meggitt's integrity, impartiality, and reputation;
- Not engage in conduct that might create a conflict of interest for Meggitt or for themselves individually;
- Safeguard all Meggitt and customer assets and use them only for approved activities. In furtherance of this protection, no one shall seek personal gain through the inappropriate use of Meggitt's intellectual property and confidential information or the intellectual property or confidential information of any third party which has been entrusted into Meggitt's care;

- No one shall buy or sell Meggitt's shares:
 - i. whilst in possession of price sensitive information or
 - ii. during a Closed Period for such transactions as advised by Meggitt's management from time to time.
- Be familiar with and refer to the other ethics and business conduct policies, including our Anti-corruption Policy, which are available on Meggitt's public website: www.meggitt.com

Meggitt's Anti-corruption Policy covers the following issues:

- Bribery
- Gifts and Entertainment
- Conflicts of Interest
- Competition and anti-trust
- Money laundering
- Sales representatives
- Distributors
- Political contributions and lobbying activities

Meggitt has implemented an Ethics and Business Conduct Programme across the Group in order to:

- Inform employees of Meggitt's policies and procedures regarding ethical business conduct;
- Provide regular training in ethics and business conduct;
- Create an environment where employees feel confident that they may raise questions or concerns and report suspected violations without fear of punishment or retaliation for doing so or for participating in an investigation;
- Sponsor an independently operated and monitored Ethics Line to enable employees to report questions or concerns about possible misconduct or to seek guidance about the proper course of action. The free telephone numbers are provided at the end of this Code and on message boards throughout our businesses. A web based application of the Ethics Line is also available for these purposes at: www.expolink.co.uk/meggitt. Log on information is provided on message boards throughout our businesses.
- Provide a safe and productive work environment in which we promote employee's health and well-being and protect others from the consequences of alcohol, drug and substance misuse;
- Monitor compliance with this Code.

Meggitt will rigorously enforce compliance with this Code. Violations may subject employees to disciplinary action, including, in serious cases, the termination of employment. However, the statutory employment rights of employees will always be honoured.



Anti-Corruption Policy

Why is this important to us in Meggitt?

Our continued success depends on working with our customers, partners, suppliers and regulators in an open and honest way.

Our Anti-corruption Policy is key to the way we do business, reinforcing our commitment to legal and ethical practices.

What is expected of me?

The Anti-corruption Policy covers many important issues. Please make sure that you take time to know what they are and how they may apply to you.

We all must ensure that we understand the transactions that we are part of and, if you are in doubt at all, please refer to the relevant section of the policy. If you are still unsure then you must speak with a Manager, or your site Ethics Coordinator.

If that is not possible, for any reason, and you have any questions or concerns, then consider contacting the people listed at the end of this Guide or call the independent Ethics Line. You will also find the right number for your country at the end of this Guide and on message boards at your business site.

Meggitt is committed to the highest standards of ethical business conduct. See Meggitt's Ethics and Business Conduct Policy and Code of Conduct available on our public website at: www.meggitt.com.

Our continued success depends on competing aggressively, but fairly, and in full compliance with the laws and regulations in those countries where we are located or do business. This Policy applies to all business units worldwide. Local customs and practices will not provide any excuse for breaches of this Policy. The Policy covers the following issues:

1. Bribery
2. Gifts and entertainment
3. Conflicts of interest
4. Competition and antitrust
5. Money laundering
6. Sales representatives
7. Distributors
8. Political contributions and lobbying activities
9. Breaches of this Policy and reporting obligations

Consider the following before you act:-

- a) a breach of this Policy will be regarded as a serious matter which may lead to internal disciplinary action, up to and including termination of employment;
- b) a breach of this Policy might also lead to prosecution;
- c) in addition to complying with the Policy, employees must ensure that people they manage or supervise understand their responsibilities;
- d) employees must report, without delay, any suspected irregular payment or breach of this Policy. If in doubt as to how the Policy works, you should seek guidance from the individuals listed in the final section of this Policy ("Breaches of this Policy and Reporting Obligations"); Meggitt's Escalation Policy provides further guidance on how to raise questions or concerns and get answers without fear of punishment or retaliation.
- e) Meggitt will provide training regarding this Policy and such training is mandatory for all employees, officers and directors; and
- f) this Policy will be enforced through regular monitoring and auditing.

1. Bribery

DEFINITION: "Bribery" is giving or receiving any gift, loan, fee, reward or other thing of value to influence the behaviour of someone, including those in government or business, in order to obtain or retain commercial or personal advantage; to transact business on more favourable terms; or to engage in any form of improper conduct. Bribery includes the misuse of public or commercial office for private gain. Bribery is a crime.

Generally, there are two aspects to this kind of corruption:

The first is a bribe paid to obtain something that the bribe recipient is not obliged to give. Examples include awarding a contract outside the normal bid and proposal process; payments to induce someone to award a contract (possibly at a higher value or on more favourable terms); or, to break the law; or make kickbacks. At Meggitt, offering, soliciting, providing, or accepting such payments are NEVER permitted.

The second is a facilitation or "grease" payment which involves making a payment to officials as a way of ensuring that they perform, either more promptly or at all, the tasks that they should in any event be undertaking. Examples could include payments to ensure mail delivery; the connection of utilities (such as telephone lines or electricity supplies); or, payments for releasing goods held in customs. In most countries this kind of payment is also a criminal offence. Meggitt policy is that such payments should NOT be made.

Bribes may take many forms, and it can often be difficult to distinguish inappropriate behaviour from legitimate business activity. Risks arise particularly where you may be working with agents or with individuals in countries whose conduct you do not directly oversee.

Whenever you are asked to approve or make a payment you should ensure that you understand fully the reason for the payment. Unless it is being made for a specific purpose (other than for ensuring business advantage), you should consider carefully whether the payment is legitimate, and if in doubt, do not make or agree to make the payment. You should raise the matter with one or more of the people referred to at the end of this policy and follow it through to appropriate resolution.

2. Gifts and entertainment

DEFINITION: A “gift” is anything of value given or received as a result of a business relationship, where the recipient does not pay fair market value. A business gift can be in any form – for example, dinner in a restaurant or club; tickets to the theatre or a sporting event; travel; a discount not available to the general public; consumer goods; or use of an individual’s or company’s time, materials, equipment or facilities. A gift offered or given to a relative of an individual with whom Meggitt has or seeks to do business is considered a gift directly to that individual. Likewise, any gift offered to or received by a relative of a Meggitt employee because of that employee’s position with Meggitt shall be considered a gift to that employee.

Gifts in the business context are not personal but are a reflection of the relationship between Meggitt and the other entity. The sale of Meggitt products and services should always be free from even the perception that favourable treatment was sought, received, or given in exchange for the gifts. As such, gifts may only be accepted by Meggitt employees if they are not extravagant or frequent, are intended to encourage normal business relations, and could not be construed reasonably as an attempt to influence a decision to award a contract, work or favourable treatment. So, for example, promotional items of nominal value are permissible. Gifts of money are never acceptable. If in doubt you should not accept the gift, or declare it to your immediate supervisor as soon as possible and seek guidance as to whether you can keep it.

Employees whose duties include negotiation of contracts or concessions, or who are involved in the evaluation of products or services for potential use or purchase by Meggitt must be especially careful to avoid any appearance of favouritism or unfair dealing. Gifts should not be accepted from vendors and suppliers before a contract is awarded, during bidding, evaluations or negotiations.

Gift giving by a Meggitt employee should be disclosed to the employee’s supervisor and approved in advance. In all cases gifts or hospitality should be kept to a scale that could not be considered as extravagant, particularly in the context of the recipient’s position and likely salary. Always consider whether the other person is allowed to accept such gifts under their policies. Another test is whether a Meggitt employee or director could accept such a gift.

Meggitt has implemented and maintains an on-line gift registry and all gifts and hospitality of more than nominal value, given or received, shall be entered in the registry by the individual involved. The frequency of such gifts and hospitality shall also be recorded. The registry will be audited regularly.

NOTE: Clearance from Meggitt Legal Counsel or VP, Ethics and Business Conduct should always be sought before making payments to public officials, because in some countries there is a presumption that such gifts are corrupt. It is not always obvious if someone is a public official. Special rules apply to government contracts and government officials. Meggitt prohibits gifts to employees or representatives of the United States Government. See Meggitt’s Standards of Business Conduct for the US Government Marketplace and consult Meggitt Legal Counsel.

3. Conflicts of interest

DEFINITION: A personal “conflict of interest” occurs when an employee’s personal, social, financial or political activities interfere or have the potential to interfere with the employee’s loyalty and objectivity towards Meggitt. Actual conflicts of interest must be avoided but even the appearance of a conflict of interest can be harmful.

Conflicts of interest can include:

- having a second job
- performing services
- serving as a director or consultant
- holding a financial interest

The activities of close relatives and friends can sometimes create conflicts of interest. A “close relative” means a spouse, partner, parent, step-parent, child, step-child, sibling, step-sibling, cousin, nephew, niece, aunt, uncle, grandparent, grandchild, or an in-law, or other person, where a legal or common law relationship exists.

In general, a relative should not have any business dealings with you, with anyone working in your business unit, or with anyone who reports to you. In addition, you should never be in a situation where you have the ability to hire, supervise, affect terms and conditions of employment, or influence the management of any close relative, regardless of whether that person is a Meggitt employee or employed by a Meggitt customer, contractor, supplier, or similar entity.

Conflicts of interest or potential conflicts of interest should be disclosed to your line manager. Under appropriate circumstances, conflicts may be waived, or safeguards may be put in place to ensure they are properly managed.

Meggitt will conduct an annual Conflict of Interest survey for the purpose of disclosing and attempting to resolve conflicts of interest.

NOTE: Special “organisational conflict of interest” rules apply to Meggitt as a company where government contracts are involved. See Meggitt’s Standards of Business Conduct for the US Government Marketplace and consult Meggitt Legal Counsel.

4. Competition and antitrust

DEFINITION: Meggitt strictly adheres to what are called “competition” laws in many countries and “antitrust” laws in others. Such laws are designed to protect and promote free and fair competition around the world. Competition laws prohibit anti-competitive behaviour, such as price-fixing, collusion and conspiracies. They also prohibit unlawfully obtaining information about competitors.

Many countries have laws prohibiting anti-competitive behaviour, so, depending on the Meggitt business location, the laws that apply may vary. Some competition laws, such as those in the USA and the European Union, can apply even when the conduct occurs outside the country’s borders.

In the EU, fines for anti-competitive behaviour can be 10% of group global turnover. In the USA and the UK, violations may be crimes and individuals who are convicted can receive prison sentences and substantial fines.

5. Money laundering

DEFINITION: “Money laundering is the process by which individuals or entities try to conceal illicit funds, or otherwise make these funds look legitimate.” Meggitt will not condone, facilitate or support money laundering.

Few Meggitt employees will ever personally be in the position to infringe money laundering laws but there are two areas which require your consideration:-

- a) irregularities in the way payments are made, such as payments in currencies other than that specified in the invoice; payments by someone not a party to the contract; payments to/from an account other than the normal business relationship account; requests for an overpayment; and
- b) customers, suppliers, and intermediaries whose operations appear to lack integrity.

6. Sales representatives

DEFINITION: A “sales representative” is an individual or an established legal entity performing services in good faith for the purpose of securing business for Meggitt. For such services Meggitt provides appropriate remuneration, generally in the form of a percentage of sales, but occasionally as a fee for services. Sales representatives are independent contractors and, as such, are not to use the Meggitt name on business cards, for stationery, or in any other manner that implies that they are Meggitt employees.

Any arrangement obligating Meggitt to pay a finder’s fee if Meggitt receives a contract shall be considered a sales representative agreement and is subject to this policy. Such an arrangement could be considered a “contingent fee” arrangement which is generally prohibited in relation to US Government contracts. Employees should consult Meggitt’s Standards of Business Conduct for the US Government Marketplace and Meggitt Legal Counsel before entering into such a sales representative agreement where the ultimate customer would be the US Government.

In order to effectively pursue its business opportunities, Meggitt businesses may engage sales representatives in circumstances where, on the basis of sound business judgment and considering the legislation and business conditions in a particular country, it is determined to be necessary and appropriate to supplement the Company’s own sales efforts.

Sales representatives must scrupulously avoid any practices which are unlawful, improper or unethical; and they must conduct themselves at all times with business associates and potential Meggitt customers, in a manner that will avoid even the appearance of impropriety and will not cause embarrassment to Meggitt, to its customers, or to the representative in the event of public disclosure. Sales representatives must act in accordance with Meggitt’s Code of Conduct and this policy, copies of which are available on line at: www.meggitt.com. The policy and Code of Conduct should also be provided to the sales representative by the Meggitt site which engages the sales representative, at the outset of the relationship.

Conduct that would be improper or illegal if committed by a Meggitt employee may not be committed by a third party, such as a sales representative or consultant, on Meggitt’s behalf. That would be improper or illegal as well.

NOTE: See Meggitt’s Sales Representatives Policy. That policy incorporates elements of this Anti-Corruption Policy and should be consulted, along with Meggitt’s Legal Counsel, at all stages of the relationship with a sales representative.

7. Distributors

DEFINITION: A “Distributor” is an individual or an established legal entity which buys Meggitt’s products, takes ownership of them, and resells them in their own name. Distributors are sometimes called “resellers” but they mean the same thing. Meggitt provides its Distributors with an appropriate opportunity to generate revenue, generally in the form of a discount from list or market prices. Distributors are independent contractors and, as such, are not to use the Meggitt name on business cards, for stationery, or in any other manner that implies that they are Meggitt employees.

A Distributor may be appointed when the Meggitt business considers it appropriate, on the basis of sound business judgment, to supplement the Company’s own sales force, taking into consideration applicable law, regulations and business conditions.

Distributors must scrupulously avoid any practices which are unlawful, improper or unethical; and they must conduct themselves at all times with business associates and potential Meggitt customers, in a manner that will avoid even the appearance of impropriety and will not cause embarrassment to Meggitt, to its customers, or to the Distributor in the event of public disclosure. Distributors must act in accordance with Meggitt’s Code of Conduct, a copy of which will be delivered to the Distributor at the outset of the relationship.

Conduct that would be improper or illegal if committed by a Meggitt employee may not be committed by a third party, such as a Distributor, on Meggitt’s behalf. That would be improper or illegal as well.

NOTE: See Meggitt’s Distributor Policy. That policy incorporates elements of this Anti-Corruption Policy and should be consulted, along with Meggitt’s Legal Counsel, at all stages of the relationship with a Distributor.

8. Political contributions and lobbying activities

Meggitt's approach to corporate political participation is simple and applies everywhere we do business:-

- The Company will not participate directly in party political activity.
- The Company will make no political contributions whether in cash or in kind, anywhere in the world.

Meggitt recognises employees' rights to participate as individuals in the political process, in ways that are appropriate to each country. However, employees should be careful to make it clear that they do not represent the Company as they participate in the political process. Therefore:-

- a) do not use Company time, property or equipment to carry out or support your personal political activities. In short, engage in the political process on your own time and with your own resources (we may allow you time off work for these purposes, including in particular where we are obliged by law to do so);
- b) always make clear that your views and actions are your own and not Meggitt's;
- c) if you plan to seek or accept a public office, you should seek the approval of your manager in advance. Approval may not be given if the manager considers that there will be an adverse impact on the performance of your job or the Company.

Lobbying and Advocacy

Although Meggitt will not directly participate in party politics, we will continue to engage in policy debate on subjects of legitimate concern to the Group, its staff and the communities in which we operate, by processes such as lobbying.

Lobbying activity on behalf of Meggitt is highly regulated by law. Our Legal Counsel are responsible for overseeing this activity. Consult your line manager before any non-routine contact is made with government officials or employees.

Non-routine is defined as:-

- other than as required by normal government processes and monitoring contracts; and
- relating to government policy or legal/regulatory changes.

9. Breaches of this policy and reporting obligations

Violations of this Policy are punishable by disciplinary action up to and including termination of employment. Violations may also result in criminal prosecution of the individuals involved.

Any director or employee who suspects or becomes aware of any violation of this Policy or any anti-corruption statute or regulation shall report the suspicion or violation to one of his or her supervisor; to Meggitt Legal Counsel; to the Senior Vice President & Group Company Secretary; or to the Executive Director, Commercial & Corporate Affairs. Anyone making such a report will be protected from punishment or retaliation in accordance with Meggitt's Code of Conduct. Anyone receiving such a report shall be responsible for escalating the report to the next higher level or to another appropriate senior employee, and for following up until it is resolved. See Meggitt's Escalation Policy.

Seek the advice of Meggitt Legal Counsel or the Senior Vice President & Group Company Secretary any time you have questions or concerns in this regard.

Names and contact information for people who can help, are contained in the Code of Conduct and on posters provided throughout your facility.

Meggitt also provides an independently operated Ethics Line, available 24 hours a day, seven days a week, which may be used to raise questions or concerns. Each Meggitt facility contains posters listing the toll free phone number to be used to place such calls. Those phone numbers are also available on line: on Meggitt's public website at www.meggitt.com, or on the MC² intranet at <https://meggitportal.sharepoint.com>.

An internet application is also available for these purposes at: www.expolink.co.uk/meggitt. Log on information will be provided on message boards throughout the company.

Each employee has received a copy of the Code of Conduct which also contains the Ethics Line phone numbers. The Code of Conduct and the phone numbers are available from your site's Ethics Coordinator. The Ethics Line should also be used if reports made to supervisors do not appear to have been addressed satisfactorily.

Strategic Business Unit Presidents and the senior on-site executives are responsible for the implementation of this policy in their businesses and at their sites.

Contacts

If you have any questions or concerns about any aspect of this Code of Conduct or the way in which we are conducting business or treating people, you should address them to your line manager or your local business unit leader. You may contact Human Resources at any time or your on-site Ethics Coordinator. If you do not consider these options appropriate you may contact any of the following:

Marina Thomas

Senior Vice President &
Group Company Secretary

Tel: +449 (0)1202 597588

Eric Lardiere

Senior Vice President,
Secretary and General Counsel,
Meggitt-USA, Inc

Tel: +1 805 526 5700 Ext 6650

Kate Coulson

Senior Legal Counsel,
Meggitt PLC

Tel: +44 (0) 2476 668 973

Philip Green

Executive Director,
Commercial and Corporate
Affairs, Meggitt PLC

Tel: +44 (0) 1202 597 569

The Ethics Line numbers are:

Australia:	1 800 121 889	Mexico:	01 800 123 0193
Belgium:	0800 71025	Netherlands:	0800 022 9026
Brazil:	0800 891 8807	Singapore:	800 4411 140
Canada:	1888 268 5816	Spain:	900 944 401
China:	1 0800 441 0078	Switzerland:	0800 563 823
Denmark:	8088 4368	UK:	0800 374 199
France:	0800 900 240	USA:	1877 533 5310
Germany:	0800 182 3246	Vietnam:	0613 836 622
India:	000 800 440 1286		

