

<p style="text-align: center;">AIRBUS U.S. Space & Defense, Inc.</p>	<p style="text-align: center;">Code of Conduct</p>	<p>Policy No: 02-001-02 Version: 3 Date: 2/21/2022 Page: 1 of 17</p>
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1. Our Management Commitment



At Airbus U.S. our vision is to provide trusted capabilities for our nation's toughest challenges. We are passionate about serving our Customer, the U.S. Government, and the quality of our products have been the foundation of our success, building our strong reputation around the world and here in the U.S. While it takes a lifetime to build a good reputation, it takes only a moment to destroy it. One bad decision can ruin our reputation in challenging times and the trust we have established with our customers. We must reaffirm and demonstrate our commitment to the core values upon which our company was built: **trust, reliability, creativity, family, and integrity**. This starts with our commitment to conduct business with integrity—for the good of our company, our people, our customers, and our shareholders.

--Rob Geckle, President & CEO, Airbus U.S. Space & Defense, Inc.

2. Purpose

To clearly define AIRBUS U.S. Space & Defense, Inc.'s Code of Conduct for conducting business with honesty, integrity, and in strict compliance with U.S. laws and regulations.

3. Scope

This Code of Conduct is applicable to all AIRBUS U.S. Space & Defense, Inc. ("AIRBUS U.S.") locations, offices, and sites, and to its subsidiaries, including Airbus DS Military Aircraft, Inc., and Airbus DS Space Systems, Inc. Additionally, AIRBUS U.S. promotes the adoption of strong ethical standards by our other stakeholders, including customers, suppliers, partners, and contractors.

4. Policy

4.1 Introduction

AIRBUS U.S. acknowledges and adopts the overarching principles of the [Airbus Code of Conduct \(CoC\)](#), with exceptions related to the points of contact and approval processes as defined herein in observance of AIRBUS U.S.'s Special Security Agreement governance requirements. AIRBUS U.S. has adopted Airbus policies and directives; those policies can be found on the AIRBUS U.S. Ethics section of the Policies & Procedures library on Airbus U.S. SharePoint.

AIRBUS U.S. demands high ethical standards of conduct from its directors, employees, and agents and will conduct its business with honesty, integrity, and in strict compliance with laws and regulations. In addition, AIRBUS U.S. is committed to providing high quality, on schedule, and within-budget products and services to our customers and fulfilling all contractual obligations. The Code of Conduct is intended to provide an understanding of AIRBUS U.S. expectations and standards for ethical behavior and responsible business practices. Each chapter of the Airbus Code of Conduct contains Do's and Don'ts as well as real-life examples that allow this document to serve as a reference guide when there are questions about how we conduct business consistent with our

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commitments. AIRBUS U.S.'s Chief Compliance Officer is responsible for administering the Airbus U.S. Code of Conduct as part of the Ethics and Compliance Program.

Although the Code of Conduct provides practical examples on issues that frequently occur, it is impossible to anticipate every situation that may arise. When in doubt, personnel are encouraged to seek advice and to Speak Up to disclose any situation that may violate laws or our internal policies and standards.

This Code applies to all employees, including officers, of AIRBUS U.S. It also applies to any person who acts on behalf of AIRBUS U.S., and sets our basic minimum expectations of all subcontractors, vendors and major suppliers. It does not, however address every possible issue or situation, and it is not intended to provide answers to all dilemmas. Wisdom, discretion, conscience, and sound judgment should always guide one's actions.

AIRBUS U.S. expects its personnel who have questions concerning matters of ethical or legal conduct to Speak Up by contacting their direct manager, their Human Resources Business Partner, another appropriate Company official such as the Chief Compliance Officer or the General Counsel, or the OpenLine for guidance. AIRBUS U.S. expects personnel who are aware of or who suspect misconduct to promptly report the matter to a manager, Human Resources, the Chief Compliance Officer, the General Counsel, or the OpenLine at 1-888-340-2375.

Failure to comply with this Code will result in disciplinary action, up to and including termination of employment.

As a U.S. Government Contractor, AIRBUS U.S. is obligated to and will report certain violations to appropriate government officials. Failure to comply with this Code or with applicable law may result in AIRBUS U.S. disclosures to appropriate authorities. Personnel found to have violated this Code or law may be, in addition to other forms of discipline, barred from working on programs involving the U.S. Government and from holding certain managerial or supervisory positions.

4.2 Speak Up, Listen Up, Step Up Culture

AIRBUS U.S. is committed to maintaining a Speak Up, Listen Up, and Step Up culture by promoting an open and trusting dialogue with employees at all levels. All employees are encouraged to express their views, defend their opinions, and point out unacceptable behavior, especially behavior that violates this handbook and our Code of Conduct. Employees can raise concerns to their line manager, their Human Resources Business Partner, to an Ethics & Compliance Representative, or through the Airbus "OpenLine". The OpenLine is available at all times for those wishing to Speak Up to seek advice, to raise a concern, or to report suspected misconduct or violations of Company policy, law or regulation. The OpenLine is hosted by a third party and can be accessed online at www.airbusopenlineus.ethicspoint.com or by calling 1-888-340-2375. Calls and reports can be made anonymously. The use of the OpenLine is optional and voluntary, and there will be no consequences for employees who do not use the system.

AIRBUS U.S. protects those who Speak Up and raise concerns appropriately and in good faith; we do not retaliate against anyone who raises a concern, or against those who assist in investigations of suspected violations. Retaliation can take many forms, both direct and indirect, including:

The official, controlling, and current version of this policy is maintained on AIRBUS U.S. Space & Defense, Inc. SharePoint. Printed hard copies or downloaded versions of this policy may not be current. Reference to the official version must be made prior to relying on any policy. This document and all information contained herein are the sole property of AIRBUS U.S. Space & Defense, Inc. Neither this document nor its contents shall be reproduced or disclosed to a third party without the consent of AIRBUS U.S. Space & Defense, Inc.

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harassment, exclusion from meetings, sanction, dismissal or other discriminatory measures, in particular related to compensation, profit sharing, free share awards, job classification, performance reviews, promotion, training, transfers, contract renewal, etc. If you believe you have been retaliated against for reporting an issue, please contact a member of the Ethics & Compliance team at ethics@airbusus.com or the Chief Compliance Officer.

The Airbus U.S. E&C team is headquartered in the Arlington (Rosslyn), VA. Each Airbus U.S. site has its own E&C Representative (ECR) who you may contact with questions or concerns regarding ethical dilemmas or E&C processes.

4.3 Government Contracts

As a contractor supplying products and services to the U.S. Government, the Company is firmly committed to conducting business in accordance with the highest ethical standards. AIRBUS U.S. personnel have an obligation to safeguard and preserve the goodwill and trust of the United States and its citizens. Personnel are also required to comply with all laws, regulations, and AIRBUS U.S. policies concerning competitions for or performance of U.S. Government contracts. For example, during the conduct of U.S. Government procurement, AIRBUS U.S. personnel, representatives and authorized third parties must not solicit or obtain any competitors' bid and proposal information or any source selection information unless authorized by law.

AIRBUS U.S. personnel shall promptly report all suspected ethical violations, improper or criminal conduct, and overpayments in connection with competitions for or performance of U.S. Government contracts or subcontracts. Personnel can make required reports as described in Section 4.2, Speak Up, Listen Up, Step Up herein.

4.4 Anti-Bribery and Corruption / Gifts & Hospitality

4.4.1 Anti-Bribery and Corruption

AIRBUS U.S. competes solely on the merits of its products and services and has zero tolerance for any form of bribery or influence peddling. We do not offer, pay, or accept bribes or kickbacks for any purpose, either directly or through a third party. The exchange of gifts or hospitality with current or prospective customers, suppliers, teammates, other third parties, or government employees can give the appearance that business decisions are being influenced by the granting or receiving of personal benefits.

If a supplier or subcontractor sends a gift to a Company employee, the employee should inform Company management. The management will make arrangements for the gift to be returned and make certain that the supplier or subcontractor is reminded of the Company's policy. If a Company employee believes that a supplier, vendor or subcontractor seeks to provide a gift to obtain favorable treatment from the Company, the employee shall report this conduct to the applicable manager.

Company personnel must not make or offer any facilitating or expediting payments to a government official, domestic or foreign, or their intermediaries. A facilitating payment is a payment made with

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the purpose of expediting or securing performance of a government action by a government official, political party, or party official.

4.4.2 Gifts & Hospitality

To avoid both actual and apparent conflicts of interest, AIRBUS U.S. limits the offering and receiving of gifts, hospitality, entertainment expenses, and other things of value. In all cases, gifts exchanged must never be extravagant, must have a business connection (as opposed to being purely personal), and must never be exchanged for the purpose of improperly obtaining or rewarding favorable treatment in connection with a business or official decision. AIRBUS U.S. personnel must not give or offer gifts or hospitality when acceptance would cause a violation of the recipient's rules or regulations. Personnel must also ensure that all meals and entertainment expenses incurred have a valid and justifiable business purpose and will not create even the appearance of impropriety, such as attempting to unduly influence or buy access to a public official. Under no circumstances should AIRBUS U.S. personnel offer, give, or accept a gift that is pecuniary in nature, such as cash, stocks, bonds or similar items.

These limits are more severe when the intended recipient is a government official or employee or when the actual or prospective business partner or supplier is associated with a government contract. For that reason, no Airbus U.S. employee may provide any government employee or other person associated with a government contract any gift, which is defined broadly to include gratuities, favors, discounts, entertainment, hospitality (including meals), loans, forbearance, or other item having monetary value, without express prior authorization by the Chief Compliance Officer.

With advance authorization, a Company employee may provide unsolicited gifts having an aggregate market value of \$20.00 USD or less per source per occasion, provided that the aggregate market value of individual gifts provided by all Company employees to any one Government employee shall not exceed \$50.00 USD in a calendar year. For that reason, advance authorization must be obtained even for planned gifts of \$20.00 USD or less to ensure AIRBUS U.S. does not exceed the \$50.00 USD per calendar year limit. Note that this \$20.00 USD or less per occasion exception does not apply to gifts of cash or of investment interests such as stock, bonds, or certificates of deposit, which are always prohibited.

For more information, please see AIRBUS U.S. Gifts & Hospitality policy in the Ethics section of the Policies & Procedures library on Airbus U.S. SharePoint or contact your Ethics & Compliance team at ethics@airbusus.com.

4.5 Anti-Money Laundering and Tax Evasion

AIRBUS U.S is committed to fully complying with all applicable anti-money laundering (AML) and counter-terrorism financing laws and will only accept funds received from legitimate sources. In addition, AIRBUS U.S. only conducts business with reputable customers involved in legitimate business activities. AIRBUS U.S. also rejects doing business in a way that assists or facilitates tax evasion by our suppliers, customers, or other third parties.

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For more information, see the Know Your Customer (KYC) policy in the Ethics section of the Policies & Procedures library on the Airbus U.S. SharePoint or contact the Ethics & Compliance team at ethics@airbusus.com.

4.6 Sponsorships & Donations

AIRBUS U.S. and Airbus affiliates seek to contribute to the economic development and social well-being of communities by partnering with local stakeholders and international organizations, and by encouraging employees to donate their time to worthy causes through the Airbus Foundation and other channels. Charitable donations, together with political contributions, must always be reviewed and approved prior to being made and must be accurately recorded in AIRBUS U.S. books and records.

For more information, see the Sponsorship, Donation, and Membership policy in the Ethics section of the Policies & Procedures library on the Airbus U.S. SharePoint or contact the Ethics & Compliance team at ethics@airbusus.com.

4.7 Competition & Fair Dealing

AIRBUS U.S. personnel are obligated to deal fairly with fellow employees, customers, suppliers, teammates, and competitors. No one should take unfair advantage of others through manipulation, concealment, misuse of privileged information, misrepresentation of material facts, or any other unfair business practice. No one should make false or misleading remarks about our products or services or those of other companies. No one should obtain competitive intelligence by illegal or unethical means (including through bribery). When working with customers such as the U.S. Government on projects that may raise issues of national security, AIRBUS U.S. personnel will not seek unauthorized access to material and will handle customer classified or proprietary marked information in accordance with the appropriate legislation, policies, and processes. For more information, contact your Ethics & Compliance team at ethics@airbusus.com, or Security at security@airbusus.com.

4.8 Conflicts of Interest

4.8.1 Organizational Conflicts of Interest

An Organizational Conflict of Interest (“OCI”) arises when factors create an actual or potential conflict of interest for the Company on a contract, or when the nature of the work to be performed by the Company on one contract creates an actual or potential conflict of interest on a future procurement. In deciding whether an improper conflict exists, the two underlying principles are:

- Preventing the existence of conflicting roles for the Company that might bias the Company’s judgment in one of those roles; and
- Preventing an unfair competitive advantage, including situations in which the Company may obtain access to proprietary or competitively sensitive government information.

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A common OCI problem involves “bid writing” by a contractor. When a contractor develops the specifications or statement of work for a competitive procurement, and the same contractor (or an affiliate) then submits a bid or proposal under that procurement, an OCI typically arises. In this instance, to avoid a situation in which the contractor could draft specifications or work statements favoring its own products or capabilities, the Government typically disqualifies the contractor from competing in the procurement.

Similarly, if a contractor in one capacity legitimately obtains access to proprietary information of a competitor (for example, by performing advisory and assistance services for an agency), then the contractor and its affiliates may be disqualified from further participation in later stages of the government procurement involving that information.

If the Company wishes to participate in a government procurement that may involve an OCI, the applicable manager should be consulted for advance review and approval of the effort. Although an OCI may exist, participation in the procurement is possible if the government contracting officer agrees that sufficient actions have been (or will be) undertaken to avoid, neutralize, or mitigate the actual or apparent OCI.

4.8.2 Personal Conflict of Interest

A Personal Conflict of Interest (“PCI”) arises when an individual employed by a contractor, subcontractor, or a consultant performing on a government contract closely associated with an inherently governmental function has a financial interest, personal activity, or relationship that could impair the employee’s ability to act impartially and in the best interest of the Government when performing under such a contract. Accordingly, in order to prevent a PCI, no Company employee may have any employment, consulting, or other business relationship with a competitor, customer, or Company supplier, or invest in any competitor, customer, or supplier (except for moderate holdings of publicly-traded securities) unless the employee (i) has advance written permission and (ii) provides notice to the applicable manager of the business relationship.

Outside employment may constitute a PCI if it (i) places an employee in the position of appearing to represent the other Company, (ii) involves providing goods or services substantially similar to those the Company provides or is considering making available, or (iii) lessens the efficiency, alertness, or productivity normally expected of employees on their jobs.

No employee may serve as a director or employee of any AIRBUS U.S. competitor, vendor, or customer without prior written approval. Any employee who performs outside work has a special responsibility to avoid any conflict with AIRBUS U.S. business interests. Outside work cannot be performed on Company time or on time being charged to a Company customer. Outside work cannot be performed using any vehicles, computers, equipment, tools, and/or uniforms belonging to the Company or to any of its customers. All outside employment that raises any question in this regard must be approved in advance by the employee’s immediate supervisor, the applicable Company manager, and Human Resources.

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Contact Human Resources, the Chief Compliance Officer, or General Counsel for guidance and to request the necessary written approval for outside work.

4.8.3 Corporate Conflict of Interest

All business decisions must be made in the best interest of AIRBUS U.S. Personnel are expected to act in AIRBUS U.S.'s interest and to avoid creating conflicts of interest or the appearance of conflicts of interest. A conflict of interest arises when an individual's private interest is contrary to or interferes in some way, or reasonably appears to interfere, with the interests of the Company.

AIRBUS U.S. personnel owe a duty of loyalty to the Company to advance its legitimate interest when the opportunity to do so arises. If you discover or are presented with a business opportunity that is in the Company's line of business, you must present the business opportunity to the Company. No one may use corporate property, information or his or her position with the Company for personal gain at the expense of the Company.

If an individual has a financial, personal, or business interest in a customer, competitor, or vendor which either affects his or her ability to act impartially or creates such an appearance, the employee must not conduct business with that person or entity without first disclosing the interest to and obtaining advice from the General Counsel or the Chief Compliance Officer. Conflicts and appearances of conflicts can also arise when family members have a financial, personal, or business interest in the customer, competitor or vendor as well. In general, if Company personnel are involved in business decisions or are engaged in business activities related to an entity in which they are or a relative (including domestic partners) is an officer, advisor, trustee, director, or principal, the individual must first disclose the relationship and obtain advice from the General Counsel or the Chief Compliance Officer.

AIRBUS U.S. personnel must also avoid any private interest that influences their ability to act in the best interest of the Company. They should not directly invest in any customer, supplier, or competitor unless the securities are publicly traded and the investments are available to the general public on the same terms, and of course, never based on any inside information. In general, Company personnel should not hold any financial interest in a customer, supplier, or competitor that could cause divided loyalty or even the appearance of divided loyalty.

For more information, see the Conflicts of Interest policy in the Ethics section of the Policies & Procedures library on Airbus U.S. SharePoint or contact your Ethics & Compliance department at ethics@airbusus.com or Human Resource Business Partners at hr.admin@airbusus.com.

4.9 Hiring/Interviewing Current and Former U.S. Government Employees

Criminal laws and regulations impose certain restrictions on the activities of former government officials and employees as well as on discussions of possible employment with current government officials and employees. As a government contractor, AIRBUS U.S. must rigorously observe these restrictions when attempting to discuss employment with a current official or employee and when Company personnel are subject to them. Prior to any such employment discussions, employees are required to confirm that that such discussions are permissible with the Chief Compliance Officer or

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the General Counsel who will coordinate with the Human Resources Department and managers. In addition, Company personnel subject to any post-government employment restriction must ensure they do not perform any assignments or duties for AIRBUS U.S. in violation of any restrictions by consulting with the Chief Compliance Officer or General Counsel. AIRBUS U.S. will request the ethics opinions from the appropriate government ethics office prior to hiring any government employee involved in procurement or other position that necessitates obtaining such an opinion.

4.10 Socioeconomic Requirements

4.10.1 Anti-Human Trafficking

The Company is committed to conducting its business in compliance with all applicable anti-human trafficking laws and regulations. No Company personnel or subcontractor will traffic in persons or use any form of slave, forced, bonded, indentured, or prison labor. In compliance with federal government policy (see FAR 52.222-50(b)), Company personnel and its subcontractors shall not at any time: engage in forms of trafficking in persons; procure commercial sex acts; use forced labor in the performance of any contract or any other work; destroy, conceal, confiscate or otherwise deny access by an employee to the employee's identity or immigration documents; use misleading or fraudulent practices to recruit employees, including using recruiters that do not comply with local labor laws; charge recruitment fees to actual or potential employees; fail to provide transportation and/or fail to pay for the cost of return transportation upon the end of employment for (i) an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a U.S. Government contract or subcontract (for portions of contracts performed outside the U.S.) or (ii) an employee who is not a U.S. national and who was brought into the U.S. for the purpose of working on a U.S. Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee (for portions of contracts performed inside the U.S.), except for an employee who is (i) legally permitted to remain in the country of employment and chooses to do so or (ii) exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation; provide or arrange housing that fails to meet host country housing and safety standards; or if required by law or contract, fail to provide a timely employment contract, requirement agreement, or other required work document in writing and in a language the employee understands.

Company personnel or subcontractors who violate this policy and/or any applicable anti-trafficking law will be subject to discipline, up to and including termination. All Company personnel and subcontractors are required to report any potential violation of the Company's policy or anti-trafficking laws and regulations of which they become aware to [insert] or the OpenLine at 1-888-340-2375. There will be no retaliation against any person who reports a possible violation in good faith, regardless of whether a violation has actually occurred. In addition, Company personnel may report concerns to the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

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4.10.2 Child Labor

The Company is committed to cooperating with authorities to end child labor. Pursuant to E.O. 13126, Company will cooperate with Government officials by providing reasonable access to records, documents, persons, or premises upon reasonable request to cooperate with authorities enforcing laws to prohibit the manufacture of importation or importation of products mined, produced, or manufactured by forced or indentured child labor.

4.10.3 Convict Labor

The Company complies with all requirements prior to extending an offer of employment. In accordance with E.O. 11755, Company must not employ, in the performance of a government contract, any person undergoing a sentence of imprisonment in the U.S. or its territories, unless one of the expressly permitted exceptions applies.

4.11 Personal Data Privacy

AIRBUS U.S. is committed to protecting the privacy of individuals and to complying with applicable personal data protection laws, including with the European Union's General Data Protection Regulation (GDPR) and applicable U.S. privacy laws. Airbus U.S. have agreed to the [Airbus Binding Corporate Rules](#) governing the protection of personal data under GDPR. In addition, digital technologies are becoming increasingly important in our company and our professional lives. While leveraging new digital technologies to enhance our business performance and customer satisfaction, we also commit that our employees will benefit from this development. Faithful to AIRBUS U.S. values, we are determined to conduct the digitalization in a human and ethical manner that balances humanity and technology.

Personal Data is any information relating to a natural person who can be identified, directly or indirectly, by reference to an identification number or to any one or more factors specific to them. This includes information such as name, phone number date of birth, email address (even a company email address) and includes any expression of opinion about the individual. The protection of Personal Data is a fundamental right in the European Union. AIRBUS U.S. Data Protection Policies (Binding Corporate Rules) provide the framework with which AIRBUS U.S. and Airbus Affiliates ensures to meet its legal obligations, not only in Europe but also in the United States, where European citizens may work and are afforded protections under the General Data Protection Regulations (GDPR) of the European Union.

Sensitive Personal Data is subject to more stringent prohibitions of use except in legally required circumstances or where consent has been specifically granted by the individual. This category of personal data includes data related to racial or ethnical origin, political opinions, religious or philosophical beliefs, trade union membership, and data concerning health or sexuality.

AIRBUS U.S. complies with the following seven principles set out in the Airbus Binding Corporate Rules reflecting the European Directive that regulates Personal Data Protection and applies them to all processes and tools, which use or retain personal data:

- **Fairness and legitimacy:** Legitimate purpose, process fairly and within the legal framework

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- Proportionality: Only collect and process the data that is needed and no more
- Purpose Limitation: To be used only for the targeted purpose
- Data Accuracy / Quality: Data should be kept up-to-date
- Retention periods: Do not keep longer than necessary
- Transparency: Individuals must be informed about their data being processed and stored
- Need to know principle: Access to the data is managed and provided only to the individuals whose role requires it

For more information, see the Binding Corporate Rules and the Data Privacy Toolkit in the Ethics section of the Policies & Procedures library on the Airbus U.S. SharePoint or contact the Ethics & Compliance team at ethics@airbusus.com.

4.12 Document Retention

AIRBUS U.S. is committed to compliance with all laws and regulatory requirements concerning the preservation and retention of documents. Preservation of documents is particularly important in the event of an investigation or litigation and for compliance with government contract requirements and auditing procedures. The preservation of electronic records and email is a critical component of complying with these requirements. All employees are responsible for taking the necessary steps to ensure that all documents, including electronic records, are preserved as required. For more information, see the Document Retention policy in the Legal section of the Policies & Procedures library on the Airbus U.S. SharePoint or contact the Chief Compliance Officer or General Counsel.

4.13 Export & Trade Compliance

Governments establish export control laws and impose sanctions and embargoes in pursuit of a number of interests, including national security and preventing arms proliferation. It is fundamental that AIRBUS U.S. be a reliable exporter, as any violation of these laws may have serious consequences, including business disruption and fines. As a result, before working or transacting with any third party or engaging in any export, re-export, or transfer of controlled items, we must ensure compliance with export control laws within the relevant jurisdictions. AIRBUS U.S. has established policies and procedures to ensure compliance with U.S. export and trade compliance laws and regulations that enable the Company to operate and execute its programs compliantly. All AIRBUS U.S. personnel are individually responsible for knowing, and at all times, complying with these policies and procedures. Export and Trade Compliance is everyone's responsibility. All matters concerning export licensing, control, and compliance requirements are managed by the AIRBUS U.S. Export & Trade Compliance team and are overseen by the Government Security Committee of the Board of Directors. No one shall export any technology, submit any proposal or agreement or make any delivery or shipment involving exports or imports without full disclosure to and required approvals. For more information, see the Technology Control Plan in the Security section of the Policies & Procedures library of the Airbus U.S. SharePoint or contact the trade team at USTradeCompliance@airbusus.com.

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4.14 Proprietary, Sensitive, and Classified Information

4.14.1 Confidential Government Information

The Company protects the confidential information of the government. Through our relationship with the U.S. Government, the Company is entrusted with access to non-public information. Company personnel will not discuss, disclose, copy, or use confidential information without advance, proper authorization or clearance. Company personnel are responsible for taking appropriate precautions to make sure unauthorized personnel do not have access to sensitive information. Company personnel should contact [insert] for help in obtaining the necessary authorizations or if otherwise in doubt. The Company will comply with any restrictions on allowing foreign nationals to access sensitive, controlled information.

The Company will provide adequate security for all covered information on covered contractor information systems, commensurate with consequences and probability of loss, misuse, or unauthorized access to, or modification of information, and rapidly report cyber incidents, as required by federal and agency regulations and contractual requirements.

4.14.2 Confidential and Proprietary Company Information

Company personnel must safeguard the Company’s proprietary and confidential information. Protecting Company confidential information is of the highest importance. When the Company submits confidential information to the U.S. Government, the Company must observe additional protections beyond those taken with commercial customers. When participating in a competitive procurement, Company personnel will mark all materials submitted to the Government as being prepared by the Company by using the legend “Airbus U.S. Bid and Proposal Information. Confidential and Proprietary Company Information – Not Subject to Release Under the Freedom of Information Act.” Company personnel will carefully mark all other materials submitted to the U.S. Government as “Confidential and Proprietary Airbus U.S. Information – Not Subject to Release Under the Freedom of Information Act.”

AIRBUS U.S. complies with all U.S. laws related to protection of trade secrets and proprietary data, belonging to both AIRBUS and to third parties. See the AIRBUS U.S. “Legal Guidelines on Trade Secrets” available on the AIRBUS U.S. Legal SharePoint for more information on acceptable practices related to trade secrets and proprietary data.

4.14.3 Classified Information

AIRBUS U.S. ensures that all recipients of classified information have the proper security clearance and a “need to know.” Further, the Company ensures that all cleared personnel comply with all training requirements, as well as policy 15-83-02 Safeguarding Classified Information. If you have any questions relating to security clearance matters or about classified material, please contact the Security Department at security@airbusus.com.

In addition, AIRBUS U.S. has an Insider Threat Program to gather and report relevant information. Should you have any questions about the program or have relevant information, please contact the Insider Threat Program Senior Official (“ITPSO”), at security@airbusus.com.

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4.15 Insider Trading

AIRBUS U.S. and Airbus information must be used for internal business purposes only, not for personal benefit. “Inside information” is non-public information about any company that would be material to an investor’s decision to buy or sell the company’s stock. Directors and employees may become aware of certain information about AIRBUS U.S. or Airbus affiliates or another company before it becomes public. Company personnel must not use this information in making stock trading or other financial instrument trading decisions, and they must not give this information to others for that purpose. This prohibition applies to all forms of investments and to all persons with inside information including employees, teaming partners, directors, agents, subsidiaries, friends, and family members. Violation of this prohibition and using inside information in this way is called “insider trading” and is a crime. For more information, contact your Ethics & Compliance team at ethics@airbusus.com or the General Counsel.

4.16 Investigations

All reports of suspected violations of the AIRBUS U.S. Code of Conduct or misconduct related thereto will be investigated and AIRBUS U.S. personnel shall cooperate. Failure to cooperate with an investigation will result in disciplinary action, up to and including termination of employment.

4.17 Mandatory Disclosure

As a party to contracts with Federal agencies and subcontracts with higher-tier prime contractors, the Company is subject to certain heightened ethics requirements. The Federal Acquisition Regulation (“FAR”) rules on mandatory disclosure and ethics and compliance require the Company, in certain circumstances, to disclose evidence of violations of criminal laws and to implement certain internal controls.

The Company, through Company management, is required to make timely disclosures to the government when the Company has credible evidence that a principal, employee, agent or subcontractor, in connection with the award, performance, or closeout of a Federal government contract or subcontract: (i) has committed a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations in Title 18 of the U.S. Code; (ii) has committed a violation of the civil False Claims Act; or (iii) the Company has received a significant overpayment by the government in connection with a Federal Government contract. The rule also creates a basis for suspension and debarment from contracting if the Company fails to timely disclose credible evidence of violations.

For this reason, among others, employees are required to immediately notify the Chief Administrative Officer of any known or suspected violations. Suspected violations may also be reported to the OpenLine at 1-888-340-2375.

4.18 Maintaining Accurate Records

Beyond being paramount to ensuring our competitiveness in the market, AIRBUS U.S. must comply with various laws and regulations pertaining to maintenance of accurate records. Failure to do so subjects the Company to severe penalties and risks adversely affecting shareholders and

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employees. For that reason, all AIRBUS U.S. employees must ensure that the business information created is accurate, timely, complete, fair, and understandable.

This includes accurate and complete reporting of time worked, business expenses incurred, research or quality test results, revenues and costs and other business-related activities. It is particularly important that time worked is recorded accurately and in a timely fashion, and all employees must ensure their timesheets are correct. No AIRBUS U.S. manager has authority to require employees to work hours that are not recorded. Any financial information provided to the U.S. Government, such as cost and pricing data, invoices, requests for change orders, and claims must be accurate, complete, and in accordance with government regulations. Company records are subject to private and government audit and financial records must be maintained in accordance with generally accepted accounting principles. Dishonest reporting will not be tolerated. No entry shall be made on the Company's books that intentionally hides or disguises the true nature of any transaction.

For more information, contact your Ethics & Compliance team at ethics@airbusus.com, the Chief Compliance Officer, or General Counsel.

4.19 Text Messaging While Driving

The Company bans text messaging while driving. Consistent with the intent of Executive Order 13513, Federal Leadership on Reducing Text Messaging While Driving, the Company prohibits its employees from text messaging while driving Company-owned or -rented vehicles, Government-owned vehicles, or privately-owned vehicles when on Company business or when performing any work for or on behalf of the Company. This prohibition does not include operating a motor vehicle with or without the motor running when one has pulled over to the side of, or off, an active roadway and has halted in a location where one can safely remain stationary.

4.20 Sourcing Restrictions

The Company only delivers products that meet the Government's sourcing restrictions. The Company's work with the U.S. Government may require that the Company use products produced or manufactured in the United States or other designated countries (generally countries that have entered into trade agreements with the United States or certain less developed countries). When these limitations apply, the Company will not provide products from other countries. The Company will not alter or remove the country of origin markings on products to be delivered to the government. The Company will not provide products from "prohibited source" countries, such as Cuba and Iran, with which the Government has decided not to do business.

4.21 Representations & Certifications

Government contracts and subcontracts often require the Company to provide certifications or other representations that specific procedures have been performed or required tests or inspections have been conducted. Company employees who prepare such statements and certifications—whether written or oral—in connection with a customer's requirements or governmental regulations must ensure that the representations are current, accurate, and complete. Such statements and

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certifications may include, but are not limited to, the following: System for Award Management (SAM); Federal Awardee Performance and Integrity Information System (FAPIIS) Reporting; independent price determination; and the use of suspended/debarred entities as subcontractors, among others.

Under no circumstances may a Company employee make a false or misleading statement, representation, or certification when dealing with the Government or other customers. Any statement that is false, fictitious, fraudulent, or contains a materially false, fictitious, or fraudulent statement or entry, may subject (a) the individual making such statement, to criminal liability punishable by up to five years in prison, or (b) the Company to a fine, and administrative liability through suspension and debarment. Additionally, if a false statement is used to obtain payment on a claim (for example, a materially false invoice for payment), the Company and/or the individual, may be subject to civil liability up to three times the amount claimed for payment.

4.22 Political Activities and Affairs

AIRBUS U.S. personnel are encouraged to exercise their rights and assume their obligations as citizens. Non-Company sponsored political activities, such as making phone calls or fundraising for candidates, must be conducted on personal time, at personal expense, and not on AIRBUS U.S. premises. AIRBUS U.S. personnel engaged in political activities may not hold themselves out as representatives of AIRBUS U.S. unless specifically authorized by the Company.

AIRBUS U.S. must comply with all laws and regulations related to lobbying and other interactions with government officials. AIRBUS U.S. coordinates its lobbying activities with Airbus Americas, Inc. Government Relations as authorized under our Affiliated Operations Plan (AOP) and cooperates fully with the Company's obligations to track and report these activities.

For more information, contact your Ethics & Compliance team at ethics@airbusus.com.

4.23 Protecting Assets & Information

All AIRBUS U.S. employees have a duty to protect AIRBUS U.S. assets, which include not only physical property but also data to include information and data, company proprietary and confidential information, information provided by third parties, including our U.S. Government customer in the form of Covered Defense Information (CDI) and Controlled Unclassified Information (CUI), and AIRBUS U.S. and Airbus Affiliates Intellectual Property. AIRBUS U.S. personnel must protect these assets against theft, damage, misuse, and improper disposal, and as required by applicable laws and regulations.

The use of Company funds, property, or assets for any unlawful or improper purpose is strictly prohibited. To ensure the protection of the Company's assets, each employee shall:

- Exercise reasonable care to prevent theft, damage or misuse of AIRBUS U.S. assets;
- Report the theft, damage or misuse of AIRBUS U.S. assets property;
- Safeguard all electronic assets, including programs, data, communications and written materials from inadvertent access by unauthorized parties; and
- Use AIRBUS U.S. assets only in the course of doing bona fide, legitimate Company work.

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Where AIRBUS U.S. employees are granted access to government-classified information, any exchange or transmission of classified information or material must comply strictly with the required security processes and clearances. Employees should immediately report any actual or suspected incident or misuse of business assets to the AIRBUS U.S. Security department.

AIRBUS U.S. prohibits employees from disclosing proprietary information, either directly or indirectly, to another person or organization unless that person or organization has signed a Non-Disclosure Agreement (NDA) to protect the information. This obligation extends beyond the period of employment at the Company to include the time after an employee leaves the Company. Personnel shall contact the AIRBUS U.S. Contracts team to initiate an NDA.

For more information, see the Acceptable Use Policy in the Information Management section, the Technology Control Plan in the Security section, and the Electronic Communications Plan (ECP) in the Security section respectively of the Policies & Procedures Library on the AIRBUS U.S. SharePoint or contact your manager, the Security team at security@airbusus.com, the Ethics & Compliance team at ethics@airbusus.com, your Chief Information Security Officer or the Chief Compliance Officer.


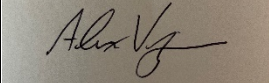
4.24 Working with Third Parties

The nature of our work requires us to interact frequently with third parties. These third parties include customers, suppliers, distributors, resellers, lobbyists, special advisors, sales intermediaries, contractors, and any other person or entity that is not an AIRBUS U.S. or other Airbus Affiliate employee or company. In order to ensure that we only work with reputable third parties who, like us, have zero tolerance for corruption and influence peddling, the Company performs robust, risk based, due diligence prior to engaging a third party. In addition, we monitor our third parties throughout the life of the business relationship to ensure they operate to the highest standards of quality and integrity and provide Airbus with the value they have promised to deliver.

For more information, see the Third Party Policy in the Ethics section of the Policies & Procedures library on the Airbus U.S. SharePoint or contact the Ethics & Compliance team at ethics@airbusus.com.

4.25 Company Personnel Training

Communication of the provisions of this Code to all employees of the Company is essential to its effectiveness. Because of the potentially severe impact on the Company resulting from allegations of business practice impropriety, it is also critical that each person understands this policy in its entirety. The Company will conduct training for all new hires and refresher training for all current Company personnel on a periodic basis.

Author:	Signature: 	Teresa Amundson, Chief Compliance Officer, AIRBUS U.S.
Approval:	Signature: 	Alex Veneziano Chief Administrative Officer, AIRBUS U.S.

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Record of Revisions:

Version	Date	Description of Change
1	03/30/2010	Original Code of Conduct
2	2/21/2022	Updated to Airbus U.S. throughout, changes related to publication of a new Employee Handbook, and incorporate the new Airbus Code of Conduct.