

1.0 APPLICABILITY

This policy is applicable to all Suppliers who support Moog, directly or indirectly, through the delivery of goods and/or services and all Suppliers who seek to sell, directly or indirectly, any goods and/or services to Moog. This policy is not intended to conflict with or modify the terms and conditions of any existing contract. If there is a conflict, Suppliers must first comply with all applicable laws and regulations, then the "Order", and then this policy. If the local law where a Supplier operates is not as strict as this policy, we require our Suppliers to comply with this policy.

Moog Suppliers should be aware of the business practices of their Suppliers, subcontractors, and other business partners to ensure compliance with the applicable law and this policy for any activity performed on behalf of Moog. As applicable, our Suppliers should proactively manage and mitigate risk in their supply chain and, when appropriate, report risk back to Moog to ensure that those risks are appropriately mitigated.

2.0 SUPPLIER RESPONSIBILITIES

2.1 Labor and Human Rights

Moog Suppliers shall respect the rights of their employees, including the right to freedom of association, fair wages, working hours, and a safe and healthy working environment. Child labor, forced labor, labor by anyone under the minimum legal age for employment where the work is performed, modern slavery, and any form of discrimination or harassment are strictly prohibited. Suppliers must educate their employees on prohibited trafficking activities and discipline employees who violate the law or rules.

Suppliers must respect international human rights standards, such as those outlined in the United Nations Universal Declaration of Human Rights and must comply with the labor laws and applicable environmental, health, and safety laws, regulations, and directives in the countries where they operate. Moog Suppliers should maintain a workplace free from the illegal use, possession, sale, or distribution of controlled substances as defined by the laws applicable to the Supplier's operations.

2.2 Environmental Responsibility

Suppliers shall identify and minimize their environmental impact by reducing waste, greenhouse gas emissions as defined by the Greenhouse Gas Protocol, and other regulated pollutants and natural resource consumption, as well as implement adaptation and risk management measures for climate and extreme weather risks. They must also comply with all applicable environmental laws, regulations, and directives in the countries where they operate and strive to minimize their environmental impact.

Suppliers are expected to collaborate with Moog to improve the processes and systems throughout the product lifecycle to protect the environment. Over time, Suppliers are expected to establish environmental sustainability priorities and report their progress.

2.2.1 Environmental Permits and Reporting

Suppliers shall comply with all applicable environmental laws, regulations, and directives, including any local, national, or international treaties relevant to their

operations. Where environmental permits and licenses are required, Suppliers are expected to obtain and maintain them in good standing.

2.2.2 Environmental Management & Planning

Suppliers are encouraged to establish an appropriate environment management system (e.g., ISO 14001 or equivalent), including policies and procedures aimed at effectively managing their environmental performance, and integrating environmental considerations into their product design or service.

2.2.3 Hazardous Substances

Supplier use and disposal of chemicals, waste, and other materials posing a hazard to humans or the environment as regulated in the countries where they operate shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

2.2.4 Material Restrictions

Suppliers shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing. Suppliers shall implement product stewardship practices, including design for safety, energy efficiency, recyclability, and appropriate labeling.

2.2.5 Greenhouse Gas Emissions

Moog reserves the right to request information on a Supplier's Scope 1, Scope 2, and material Scope 3 category greenhouse gas emissions, as applicable to services provided to Moog during the term of active Orders.

2.3 Business Integrity

Moog Suppliers must maintain an ethics and compliance program that is appropriate for the size and nature of their business. Suppliers must conduct their business with integrity. This includes, but is not limited to, avoiding conflicts of interest, not engaging in bribery or corruption, and protecting confidential information. Suppliers should compete on the merits of their products and services rather than by engaging in any illegal or unethical business practice. Moog Suppliers must comply with all applicable competition and antitrust laws.

2.4 Whistleblower Protection

Moog Suppliers should provide their employees with avenues to raise legal or ethical issues without fear of retaliation. Our Suppliers should take steps to prevent, detect, and correct any retaliatory conduct.

Suppliers may ask questions or raise concerns to Moog as described in the Contact Information Section below or by using the ethics and compliance hotline (Moog TrustLine) that is accessible at <https://moog.ethicspoint.com>

2.5 Conflicts of Interest

Conflicts of interest may arise when personal interests interfere (or appear to interfere) with a person's ability to make objective business decisions or perform their duties without bias. A conflict could arise between Moog's interests and the personal interests of those working on our behalf, or their close relatives, friends, or associates. Moog Suppliers must avoid any situation that may create a conflict of interest (or the appearance of a conflict of interest) in their dealings with Moog.

2.6 Product Quality

Moog Suppliers must take due care to ensure their products and services meet Moog's quality standards. Our Suppliers must maintain robust quality management systems, comply with all Orders, and ensure that products and services are delivered right the first time, on time, every time. This includes proactive risk management, process control, and continuous improvement of processes, products, and services.

2.7 Compliance with Applicable Laws

Suppliers must comply with all applicable laws and regulations in the countries where they operate. This includes (but is not limited to) laws related to labor, health and safety, environment, anti-corruption, and human rights.

2.7.1 U.S. Government Contracting

Suppliers must comply with the applicable rules that apply to contracting with the U.S. government. Where applicable, Suppliers must comply with all applicable U.S. Federal Acquisition Regulation clauses, which govern a wide range of areas including procurement procedures, labor laws, and pricing. Suppliers must follow the U.S. government's rules for competing fairly; deliver products and services that conform to specifications, laws, and regulations; adhere to government accounting and pricing requirements; and ensure the accuracy of data submitted.

If applicable, Suppliers must adhere to the Buy American Act¹, which requires the U.S. government's preference towards U.S. made products in its purchases.

In accordance with the False Claims Act², Suppliers must not make (or cause to be made) false or fraudulent claims, records, or statements to the U.S. government. This includes, but is not limited to, misrepresenting the value of goods or services, or their compliance with contract requirements.

Suppliers must not offer, provide, or accept kickbacks, and must comply with the Anti-Kickback Act³ of 1986.

¹ FAR 52.225-1

Buy American Act

² FAR 52.203-13

Contractor Code of Business Ethics and Conduct

³ FAR 52.203-13

Contractor Code of Business Ethics and Conduct

If supplying for defense-related contracts, Suppliers must comply with Defense Federal Acquisition Regulation Supplement (DFARS), which includes specific requirements related to cybersecurity, counterfeit parts prevention, and sourcing of certain materials.

2.7.2 Trade Laws

Suppliers must comply with all U.S. trade laws, including export control laws and regulations, and sanctions programs administered by the Office of Foreign Assets Control (OFAC).

Suppliers must comply with all applicable international trade laws, directives, and regulations, including those related to import/export controls, customs, and tariffs.

2.7.3 Bribery and Corruption

Suppliers must comply with all applicable anti-corruption laws, directives, and regulations, such as the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, that govern operations in the countries in which they do business regardless of local customs.

2.7.4 Other Laws

Suppliers must comply with all applicable data protection and privacy laws in the countries where they operate, such as the General Data Protection Regulation (GDPR) in the European Union.

Suppliers must comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act requirements on conflict minerals, which require companies to disclose whether their products contain minerals sourced from conflict-affected regions. If applicable, Suppliers must also comply with international regulations on conflict minerals, such as the EU Conflict Minerals Regulation. Suppliers who manufacture or contract to manufacture products containing conflict minerals must make the necessary disclosure and reports required by applicable law and regulations.

In some countries, there may be local content requirements that mandate a certain percentage of goods or services be sourced locally. Suppliers must be aware of and comply with these requirements where they apply.

Suppliers should comply with anti-money laundering laws and regulations. Suppliers should not engage with any entity or in any activity that would involve Moog in money-laundering schemes.

Suppliers should comply with all laws governing intellectual property rights assertions.

2.8 Supply Chain

Moog carries an expectation that our Suppliers manage their own supply chains to the standards of this policy.

2.9 Accurate Records

Suppliers should be honest and transparent and maintain complete and accurate records for all transactions and processes related to Moog's business. All records, regardless of format, made or received in furtherance of a business transaction must accurately represent the transaction or event being documented. Suppliers should not alter any record to conceal or misrepresent the underlying transaction represented by it. All records should be retained based on the applicable records retention requirements.

2.10 Protection of Assets and Information

Suppliers should implement practices and procedures to protect all Moog assets in their possession (or the possession of their subcontractors (if any)) against unauthorized access, loss, damage, theft, and misuse. Suppliers must only use those assets in a manner permitted under our contract. Moog's assets include, but are not limited to, physical assets, confidential and proprietary information, trade secrets, copyrights, trademarks, and any other company data accessible to the Supplier.

2.11 Reporting

Suppliers shall report any concerns or violations of this policy to Moog Inc. as described in the Contact Information Section or by using the ethics and compliance hotline (Moog TrustLine) that is accessible at <https://moog.ethicspoint.com>

3.0 MOOG RESPONSIBILITIES

Moog reserves the right to verify Suppliers' compliance with this policy through audits, reviews, and/or inspections. Suppliers who do not comply with this policy may face corrective action, up to and including termination of the business relationship.

4.0 VIOLATIONS OF THIS POLICY

If a Supplier violates any of the above provisions of this policy, Moog may pursue corrective action to address the situation. If there is a violation of law or regulation, Moog may be required to report that violation to the relevant authorities. Moog reserves the right to terminate our Order with any Supplier.

5.0 CONTACT INFORMATION

Please feel free to contact MoogEthics@moog.com if you have any questions regarding this policy.