



AHI CODE OF ETHICS

Overview

Hemmingford Aerospace is committed to the highest standards of ethics and business conduct. All AHI employees must comply with the law, act in good faith, uphold AHI's values, protect the reputation of our company and of our clients, and hold themselves accountable for the quality of their work.

Compliance with Laws

AHI maintains full compliance with all laws and regulations applicable to the operation of our business and to our relationship with our clients.

Quality & Environmental Health and Safety

The safety and health of our employees and clients is a top priority at AHI. Our quality assurance processes ensure that our products and services meet or exceed contractual quality and legal and regulatory requirements. All required inspection and testing operations must be completed properly by appropriately authorized and qualified individuals. We conduct our operations in a manner that safeguards the environment, minimizes waste, emissions, energy consumption, and the use of materials of concern.

Competition on the Merits and Fair Play

We compete strictly on the basis of the merits of our products and services. Bribery, defined as offering, promising, authorizing or providing, directly or indirectly, anything of value with the intent or effect of inducing anyone to forego their duties and provide an unfair business advantage, is prohibited. We will not engage in any anti-competitive conduct for any reason whatsoever or exchange competitively sensitive information (e.g., price, cost, output, etc.) with our competitors nor with our clients' competitors. We will not abuse our market power by tactics such as refusing to deal, engaging in predatory or discriminatory pricing practices, conditioning the sale or provision of a particular product or service with that of another product or service. We pledge not to engage in any other deceptive or unfair market practices, such as misrepresenting our clients' products or services, our products or services, or the products or services of others. We will never denigrate our clients' competitors nor our competitors, nor their products or services.

Conflict of Interest

We avoid all conflicts of interest or situations giving the appearance of a conflict of interest, and pledge to disclose any relationship that may potentially be considered a conflict of interest, such as a personal relationship between an AHI employee and a client who can make decisions impacting our business.

International Trade Compliance

We conduct business in strict compliance with all applicable laws and regulations governing (a) the export, re-export and retransfer of goods, technical data, software and services; (b) import of goods; (c) economic sanctions and embargoes; and (d) U.S. antiboycott requirements.

Information Protection

We respect the legitimate proprietary rights and intellectual property rights of our clients and others. We protect sensitive information, including confidential, proprietary and personal information. We will use such information only for the business purpose for which it was provided.

Accuracy of Records and Submissions

We maintain books and records that accurately and completely reflect all transactions related to our business. Each of our submissions to our clients and to regulatory authorities is accurate and complete. We will never make any entry in our books and records to alter, conceal, or destroy any document or to misrepresent any fact, circumstance, or transaction.

Non-Discrimination

We treat our existing and prospective employees and business partners fairly, based only on merit and other factors related to our legitimate business interests, and without regard to race, religion, color, age, gender, gender identity or expression, sexual orientation, national origin, marital status, veteran status or disability.

Child Labor

We ensure that child labour, defined as the regular employment of children under the age of 16, is not used in the performance of our work. AHI may offer restricted, temporary work opportunities to children under the age of 16 in compliance with provincial and federal labour standards and laws.

Human Trafficking

We comply with laws and regulations prohibiting human trafficking. We do not engage in the use of forced labor, bonded labor, indentured labor, involuntary prison labor, slavery or trafficking in persons.

Anonymous Reporting & Reporting Misconduct

We provide our employees and business partners with access to reporting channels to raise legal or ethical issues or concerns, including reports of a violation of this code, without fear of retaliation and include opportunities for anonymous reporting. In the event that we become aware of misconduct undertaken by any employee, any client representative, or any employees of our business partners, we will promptly investigate reports of legal or ethical issues or concerns and notify any affected clients.

To report misconduct related to UTC business, our employees or business partners may contact UTC's Global Ethics & Compliance Office at bpo@corphq.utc.com. If an employee or business partner prefers to contact UTC anonymously, he or she may use the Ombudsman program (details regarding the Ombudsman program can be accessed at the following site <http://www.utc.com/Our-Company/Ethics-And-Compliance/Pages/Ombudsman-DIALOG.aspx>).

Ethics & Compliance Program

We have management systems, tools and processes in place that (a) ensure compliance with applicable laws, regulations and the requirements set forth in this code; (b) promote an awareness of and commitment to ethical business practices, including the expectations set forth in this code; (c) facilitate the timely discovery, investigation, disclosure and implementation of corrective actions for violations of law, regulations or the expectations set forth in this code; and (d) provide training to our employees on compliance requirements, including the expectations set forth in this code.

Our Business Partners

We strictly comply with all contractual obligations to our clients. We carefully select our business partners, and perform due diligence, audit, and oversight to prevent and detect misconduct. We flow down the principles set forth in this code to our business partners.

Code Compliance

The AHI management team is solely responsible for ensuring full compliance with this code on the part of our administrators, managers, employees and business partners. Our clients have the right to evaluate our business partners' conformance to this code.