

Curtiss-Wright Corporation
Policy No.1A
Code of Conduct –
Suppliers and Customers
December 2014

Curtiss-Wright operates its worldwide business in accordance with the highest ethical standards and relevant laws. The Company places the highest value on the integrity of each of its suppliers and customers that wish to do business with Curtiss-Wright. All suppliers and customers of Curtiss-Wright are responsible for complying with all applicable laws, regulations and this Code of Conduct. Curtiss-Wright's corporate culture demands not only legal compliance, but also responsible and ethical behavior.

Curtiss-Wright provides this Code of Conduct to its suppliers and customers worldwide for their guidance in recognizing and resolving properly the ethical and legal issues they encounter in conducting their business. In this Code of Conduct, the words "we" and "our" refer to Curtiss-Wright's supplier(s) and customer(s).

We Obey All Laws and Regulations

Our companies are committed to doing business with integrity and according to all applicable laws. Products must be designed, produced, installed and serviced to internal standards and to comply with external regulations, the standards of the appropriate approval entities, and any applicable contractual obligations.

We Provide Quality Products and Services

Our businesses will provide products and services that meet or exceed our customers' expectations for quality, integrity and reliability.

We Seek Business Openly and Honestly

We market our technologies, products and services fairly and vigorously based on their proven quality, integrity, reliability and price.

- Our businesses strictly prohibit bribes, kickbacks or any other form of improper payment, direct or indirect, to any representative of government, labor union, customer or supplier in order to obtain a contract, some other commercial benefit or government action. Our companies also strictly prohibit any employee from accepting such payments from anyone.
- Our businesses will comply with the domestic and international antitrust and competition laws of all nations where we do business.

We Follow Accurate Billing Procedures

Our businesses will reflect accurately on all invoices to customers the sale price and terms of sales for products sold or services rendered.

We Safeguard the Property of Others

Our businesses safeguard the tangible and intellectual property of those with whom we do business, which may be used in fulfilling work assignments, and we will comply with all regulations or contractual requirements governing the use of such property.

We Abide By The Government's Contracting Rules

In addition to the provisions of this Code, employees working with the U.S. government, state or local governments, or governments of those countries where we operate, have an additional obligation to know, understand and abide by the laws, regulations and ethical standards of those governments that may be more strict than those that apply to our non-government customers and suppliers.

- The Foreign Corrupt Practices Act (“FCPA”) prohibits our businesses from making a payment or giving a gift to a foreign government official, political party or candidate or public international organization (“foreign official”) for purposes of obtaining or retaining business.
- In transactions involving the U.S. government, our businesses will adhere to the provisions of the Truth in Negotiations Act and we will make certain that cost and pricing data are current, accurate, complete, properly disclosed, documented and retained in appropriate files.

Our Relationship with our Suppliers

We award business to our suppliers based on their ability to meet our needs and commitments, their reputations for service, integrity and compliance, their high standards for quality and delivery and their price structures.

We Will Not Be Influenced by Gifts

We will not be influenced by gifts or favors of any kind from our suppliers or potential suppliers. Our businesses expect each employee to exercise reasonable judgment and discretion in accepting any gratuity or gift offered to the employee in connection with employment at one of our businesses.

We Honor the Individual

Our businesses recognize the dignity of the individual, respect and trust each employee.

We Live Our Values

As representatives of our companies to the outside world, and regardless of the pressures inherent in conducting business, we will act responsibly and in a manner that will reflect favorably upon ourselves and our businesses as a whole.

We Avoid Conflicts of Interest

We will avoid any situation that may create, seem to create, or be perceived to create a conflict between our personal interests and the interests of our businesses.

We Invite Full Participation

Our businesses are committed to an all-inclusive work culture. We believe and recognize that all people are unique and valuable, and should be respected for their individual abilities and contributions. Our businesses aim to provide challenging, meaningful and rewarding opportunities for personal and professional growth to all employees without regard to gender (including pregnancy, childbirth or related medical conditions), race, ethnicity, color, sexual orientation, physical or mental disability, age, ancestry, legally protected medical condition, family care status, marital status, religion, veteran status, national origin or any other legally protected status.

We Work in a Positive Environment

- Our businesses prohibit the manufacture, distribution, sale, purchase, transfer, possession, or use of illegal drugs in the workplace, while representing our company outside the workplace or if such activity affects our work performance or the work environment of our businesses.
- Our businesses prohibit all forms of harassment of employees by fellow employees, employees of outside contractors or visitors. This includes any demeaning, insulting, embarrassing or intimidating behavior directed at any employee because of his or her gender (including pregnancy, childbirth or related medical conditions), race, ethnicity, color, sexual orientation, physical or mental disability, age, ancestry, legally protected medical condition, family care status, marital status, religion, veteran status, national origin or any other legally protected status.
- Our companies specifically ban unwelcome sexual advances or physical contact, sexually oriented gestures and statements, and the display or circulation of sexually oriented pictures, cartoons, jokes or other materials.
- Our businesses prohibit employees from engaging in any hostile physical contact, intimidation, threats of such actions or violence, or any other actions that may be considered threatening or hostile in nature while on the premises, at a sponsored function, while representing our businesses or acting on its behalf.

We Will Not Employ Child or Forced Labor

- Our businesses do not and will not employ child labor.
- Our businesses do not and will not employ forced labor or employ subcontractors that do.

We Provide a Safe Workplace

It is the policy of our businesses to establish and manage a safe and healthy work environment and to manage its business in ways that are sensitive to the environment. Our businesses will provide a workplace that is free from safety or health hazards or will control such hazards to acceptable levels.

We Will Safeguard the Information of Others

- We will observe obligations of confidentiality and non-disclosure of trade secrets of others, including our suppliers, customers, and former employers, with the same degree of diligence that our employees are expected to use in protecting the confidential information and trade secrets of our respective businesses.

We Report with Integrity

The financial, accounting, and other reports and records of our businesses will accurately and fairly reflect the transactions of our respective businesses in reasonable detail, and in accordance with approved accounting practices and procedures and applicable government regulations.

We Comply with Local Laws and Customs

Our companies conduct business globally where laws, customs and social requirements may be different from those in the United States. It is the policy of our businesses to abide by the national and local laws of our host nations and communities.

We Protect the Environment

Our businesses abide by all applicable health, safety and environmental laws and regulations in countries and communities in which we operate, and where those are considered inadequate, our companies will abide by our own high standards.

We Comply with Antiboycott Laws

Our companies will comply with laws that prohibit a wide variety of activities associated with organized foreign economic boycotts, including: refusing to do business with boycotted countries, their nationals or blacklisted companies; furnishing information about our company's past or any person's past, present or prospective relationship with boycotted countries or blacklisted companies; furnishing information about any person's race, religion, sex, national origin, or membership in or support of charitable organizations supporting a boycotted country; discriminating against individuals or companies on the basis of race, religion, sex or national origin; and paying, honoring or confirming letters of credit containing prohibited boycott provisions.

We Comply with Export Control and Import Laws

Our companies will comply with all Export Control and Import laws and regulations that govern the exportation and importation of commodities and technical data, including items that are hand-carried as samples or demonstration units in luggage.

Responsibilities of All Employees

Each supplier and customer shall comply with the letter and spirit of this Code of Conduct, and shall communicate any suspected violations promptly. Violations are to be reported by calling the Code of Conduct Helpline (1-800-554-7109 in the United States; or 08-000280394 in the United Kingdom; or 0800-561119 in Switzerland; or 10-800-712-2380 in Northern China and 10-800-120-2380 in Southern China).