



SUPPLIER
CODE OF
CONDUCT »»

ELBIT AMERICA



FROM OUR PRESIDENT AND CEO

TO: OUR SUPPLY CHAIN PARTNERS

Elbit America is committed to doing what's right in all areas of our business. Operating ethically is an important factor that enables Elbit America to fulfill our customer commitments. This includes acting with integrity when conducting business with suppliers, contractors and consultants.

A reliable and ethical supply chain is critical to Elbit America's ability to deliver superior products and services. Integrity, safety and quality are fundamental to our performance, and we strive to foster a collaborative environment with our supply chain. Our customers trust us to work with suppliers, subcontractors and other business partners who share these values.

To support the integrity of our business activities, we require members of our supply chain to adhere to the Supplier Code of Conduct (Code). The values and principles set forth in the Code represent our mutual commitment to the ways we conduct business. They are integral to every relationship you have with Elbit America. The values and principles of the Code are consistent with those adhered to by the International Forum on Business Ethical Conduct of the U.S. and European aerospace and defense industries.

Our mission at Elbit America is to create and deliver innovative solutions that protect and save lives. We're able to fulfill this mission because of reliable supply chain partners such as yourself. Thank you for helping us maintain an exceptional standard of business integrity.

Luke Savoie

*President and Chief Executive Officer
Elbit Systems of America, LLC*

ELBIT AMERICA

INTRODUCTION

OUR REPUTATION IS BASED ON DELIVERING SYSTEMS AND PRODUCTS THAT
CREATE VALUE FOR OUR CUSTOMERS AND PROTECT & SAVE LIVES

Welcome to Elbit America's Supplier Code of Conduct. Conducting our business honestly, ethically, and in accordance with applicable laws and regulations where we conduct business, is critical to our continued success. The purpose of this Code is to facilitate our Supply Chain's commitment to ethical and compliant business conduct.

In addition to the specific provisions of the Code and any other Elbit America policies, procedures or contractual obligations we may ask suppliers to follow, we expect members of our Supply Chain to conduct their business activities in the same manner as Elbit America.

Jason Allen

*Vice President of Corporate Supply Chain
Elbit Systems of America, LLC*



ELBIT AMERICA

BUSINESS CONDUCT OVERVIEW

Elbit Systems of America's ("Elbit America") reputation is based on delivering systems and products that create value for our customers and protect and save lives. We strive for excellence in all that we do, following ethical standards. We expect our suppliers, subcontractors and consultants (collectively "Supply Chain") to do the same. By entering any subcontract or purchase order with Elbit America, you are committing to act in a manner consistent with this Code.

While the Code contains standards to guide you, no one document can cover all situations. If a rule in this Code conflicts with a legal requirement, you must comply with the law.

This Supplier Code of Conduct includes best practices and is based on Elbit America's Code of Business Ethics and Conduct, which is available for review at www.elbitamerica.com/ethics. This Code is intended to promote a culture that complies with not only the letter, but also the spirit, of all applicable laws, rules and regulations and related Elbit America policies and procedures.



LEGAL COMPLIANCE

COMPLIANCE WITH LAWS AND REGULATIONS

Suppliers must know and follow the laws that apply to them and their business, treating legal requirements as a minimum standard. When suppliers find issues related to any topic in this Code, suppliers must alert Elbit America so that we can work together to resolve the concern and remain in compliance with laws and regulations.

FOLLOW THE RULES FOR CONTRACTING WITH THE GOVERNMENT

Suppliers must comply with the specific rules that apply to contracting with the U.S. Government. This means we expect suppliers who work with us in support of a U.S. Government contract to:

- Follow the U.S. Government's rules for competing fairly;
- Honor restrictions applying to U.S. Government employees, including those related to gifts, hospitality and offers of employment;
- Deliver products and services that conform to specifications, laws and regulations;
- Adhere to government accounting and pricing requirements;
- Ensure the accuracy of data submitted;
- Comply with all other applicable U.S. Government requirements; and
- Promptly report any suspected violations of the Code, law, or regulations.

COMPETITION AND ANTI-TRUST COMPLIANCE

We compete fairly and within the law. Suppliers must also comply with applicable competition laws (sometimes called "antitrust laws") of all relevant countries. These laws forbid formal or informal understandings, agreements or arrangements among competitors that unfairly restrict competition. Suppliers must not fix prices, rig bids with competitors, or participate in a cartel. This includes a prohibition on exchanging current, recent or future pricing information with competitors and using the exchange of business gifts or hospitality to gain an unfair advantage.

GLOBAL TRADE COMPLIANCE AND SANCTIONS

Suppliers must ensure their business practices are in accordance with all applicable trade control laws. This includes directives and regulations governing the import and export of parts, components and technical data. Suppliers will provide truthful and accurate information for import and export authorization and obtain import and export licenses or approvals where necessary.

Suppliers must screen the third parties they engage with. This is to ensure full compliance with all relevant financial sanctions, trade embargoes, and other restrictive measures imposed by applicable government authorities.

ANTI-BOYCOTT COMPLIANCE

The United States anti-boycott laws prevent the participation of United States citizens in other nations' economic boycotts or embargoes. As a government contractor, Elbit America is required to comply with the anti-boycott laws and regulations. A supplier's failure to comply may make them legally responsible and may result in serious consequences for Elbit America.

INTELLECTUAL PROPERTY RIGHTS

Elbit America is committed to protecting our intellectual property rights and those of our customers and business partners to the full extent of the law and our agreements. This includes patents, trademarks, copyrights, and trade secrets. Suppliers must comply with all laws and contractual requirements governing intellectual property rights claims and assertions. We also require appropriate security measures to protect classified and other sensitive information.

BUSINESS INTEGRITY AND ETHICS

Suppliers must extend the principles of this Code to their business partners and suppliers. They must ensure compliance through auditing and oversight to prevent and detect misconduct or other risks within their operations and supply chain. Suppliers must report risks to Elbit America to ensure that those risks are handled promptly and mitigated appropriately.

Suppliers must use reasonable care to prevent and detect corruption, sanctioned parties, money-laundering issues, human rights abuses, and fraud. This applies to all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of third-party agents, or consultants.

ANTI-BRIBERY AND ANTI-CORRUPTION

Suppliers must comply with the anti-corruption laws, directives and regulations that govern their operations. When working with Elbit America, this includes compliance with the U.S. Foreign Corrupt Practices Act (FCPA).

Elbit America has zero tolerance for fraud, bribery and corruption. Suppliers must understand

and abide by the FCPA as well as applicable international conventions. These include the Organization for Economic Co-operation and Development (OECD) Convention and the United Nations Convention Against Corruption. Suppliers, third-parties, consultants, or any person acting on behalf of Elbit America must not engage in any activities that could reasonably appear to be corruption. Suppliers should avoid the appearance of wrongdoing. This includes business entertainment, gifts, conflicts of interest, hiring, and donations. Suppliers must:

- Not offer or make payments of money or anything of value (including kickbacks, favors, gifts, entertainment, travel, political contributions, charitable donations, or other business courtesies) to customers, government officials, political parties, candidates for public office, charities, or other business-related parties that could be considered to improperly influence a business decision.
- Forbid facilitation payments intended to expedite or secure performance of routine governmental action. This could include obtaining a visa or customs clearance, except in situations where there is an imminent threat to personal health or safety.
- Perform careful checks and monitoring activities to prevent and detect corruption in all business arrangements. This includes partnerships, joint ventures, offset agreements, and the engagement of third parties, including consultants.

ANTI-MONEY LAUNDERING

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



CONFLICTS OF INTEREST

Suppliers must avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Suppliers must immediately notify all affected parties if an actual or potential conflict of interest arises. Conflicts of interest can 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. This applies to a conflict between the interests of our company and the personal interests of those working on our behalf, or their close relatives, friends, or associates.

INSIDER TRADING COMPLIANCE

Suppliers and their personnel must not use any material or non-publicly disclosed information obtained during their business relationship with Elbit America as the basis for trading or for enabling others to trade in the stock or securities of any company. Recognizing that the shares of our parent company, Elbit Systems Ltd., are publicly traded, suppliers are required to comply with all insider trading rules relating to any business dealings with us.

SOURCE SELECTION INFORMATION AND PROCUREMENT INTEGRITY

Suppliers must not improperly obtain, use, or disclose government source selection or proprietary information. Suppliers will not ask officials to disclose the proprietary information of our competitors, nor will suppliers improperly ask for source selection material. Suppliers will not share any of our proprietary information or other program-related information without our permission.

ACCURATE RECORD-KEEPING

Suppliers must keep appropriate records to demonstrate compliance with this Code, as well as all applicable laws and regulations. This includes creating accurate records for all transactions and business processes related to Elbit America business, including those for timekeeping and invoicing purposes. A supplier shall not alter any record entry to hide or misrepresent the underlying transaction represented by such records. All records made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on applicable document retention requirements.

RESPONSIBLE SOURCING OF MATERIALS

Suppliers must comply with applicable laws and regulations regarding "Conflict Minerals". Suppliers should establish a policy to ensure that any minerals which may be contained in the products they manufacture do not directly or indirectly finance or benefit armed groups who commit human rights abuses. Suppliers should exercise due care in the sourcing and chain of custody of these minerals and require the same from their own suppliers.

COUNTERFEIT PARTS PREVENTION

Suppliers must implement effective processes to detect and prevent the introduction of counterfeit parts and materials to Elbit America. Suppliers will notify recipients when such products are identified, and ensure they are excluded from delivered goods.

LOBBYING

Suppliers are not authorized, directly or through others, to engage in lobbying activities designed to influence government policies, or the award or administration of government contracts, on our behalf without our prior approval.

ETHICAL USE OF ARTIFICIAL INTELLIGENCE

Elbit America is committed to the ethical use of artificial intelligence. Suppliers must review and support the United States Department of Defense Ethical Artificial Intelligence Principles when developing or using artificial intelligence solutions on our behalf. Suppliers shall not use AI tools in conjunction with any type of Elbit America technical data or proprietary information without the consent of Elbit America's Legal department.

MARKETING MATERIALS AND INTERACTIONS WITH THE MEDIA

Elbit America controls the release of any marketing materials, press releases or media interviews that include a reference to Elbit America, our affiliates, our customers, our end users, or our cooperative activities with suppliers. Any such release requires advanced approval by Elbit America.

LABOR AND HUMAN RIGHTS

We are committed to respecting human rights and human dignity. Suppliers must comply with all applicable laws pertaining to fair employment practices, as well as laws prohibiting forced and compulsory labor, child labor, employment discrimination, and human trafficking. Elbit America will not tolerate the abuse of human rights.

LABOR LAWS

Suppliers are required to provide fair wages and comply with working hours laws, provide safe working conditions, and respect for human rights. This includes freedom of association and freedom from forced or child labor. Suppliers must responsibly and swiftly address any form of forced or child labor.

Suppliers must respect the rights of workers to communicate openly with management on working conditions without fear of harassment, intimidation, penalty, interference, or punishment. Suppliers must recognize and respect any rights of workers to exercise lawful rights of free association with any labor association of their choosing.

EMPLOYMENT PRACTICES

Suppliers are required to ensure that their employees' work environment is free from physical, psychological and verbal harassment, or other abusive conduct. Suppliers must provide equal employment opportunity to employees and applicants for employment without discrimination, consistent with all applicable regulations.



WAGE AND BENEFITS

Suppliers must pay workers at least the minimum compensation required by local law and provide all legally required benefits. Suppliers must pay workers overtime at such premium rate as is legally required or, in countries where such laws do not exist, at least equal to their regular hourly payment rate. Deducting from wages as a disciplinary measure is not permitted.

ENVIRONMENTAL HEALTH AND SAFETY

Suppliers must comply with all applicable environmental, health and workplace safety laws and regulations. Suppliers must establish an appropriate management system for environmental, health, and safety compliance.

PROTECTION OF EMPLOYEE HEALTH AND SAFETY

Suppliers should protect the health, safety and welfare of their employees, contractors, visitors, and others who may be affected by a supplier's activities. Suppliers must maintain safe, healthy, and humane working conditions at all locations. Suppliers must maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

CONSERVATION OF NATURAL RESOURCES

Suppliers must actively manage risk, conserve natural resources, and protect the environment in the communities where they operate. Suppliers should establish processes throughout the product lifecycle, where possible, to promote environmental responsibility and to minimize the impacts of operations, products, and supply chains.

DATA PRIVACY AND CONFIDENTIALITY

PROTECTION OF SENSITIVE INFORMATION

Suppliers must take necessary steps to protect and safeguard sensitive information, including:

Proprietary Information: This includes trade secrets, patents, trademarks, copyrights, business, marketing, financial, human resources, technical and administrative information not released to the public. Suppliers must protect the proprietary information provided by Elbit America. It cannot be shared with a third party without Elbit America's express written permission.

Classified Information: This includes data and items that for reasons of national security must be safeguarded and maintained in accordance with applicable laws and regulations in support of a government program. To receive this information, supplier's facility must possess the appropriate government approved security clearance. It is important to remember that releasing classified information to unauthorized people will harm national security.

Federal Contract Information (FCI): As defined in section 4.1901 of the Federal Acquisition

Regulation (FAR), FCI is "information, not intended for public release, that is provided by or generated for the Government under a contract to develop or deliver a product or service to the Government, excluding information provided by the Government to the public (such as that on public websites) or simple transactional information, such as that necessary to process payments."

Controlled Unclassified Information (CUI): As outlined in Title 32 CFR 2002.4(h), CUI is "information the Government creates or possesses, or that an entity creates or possesses for or on behalf of the Government, that a law, regulation, or Government-wide policy requires or permits an agency to handle using safeguarding or dissemination controls." For more information regarding specific CUI categories and subcategories, see the DoD CUI Registry website.

USE OF SENSITIVE INFORMATION

Suppliers will properly handle sensitive information, including Classified, Proprietary, FCI, CUI, and personal information. Suppliers should not use such information for any purpose (e.g. advertisement, publicity and the like) other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information. Unauthorized use or distribution of sensitive information through any means, including social media, violates this Code. It may also violate applicable law, as well as regulatory and contractual requirements.

SAFEGUARDING COMPANY ASSETS AND DATA

Elbit America relies on suppliers to safeguard all company assets entrusted to them. This includes protecting company assets against unauthorized access, loss, damage, theft, or misuse. Assets must be used solely as permitted under our contracts. These assets include physical property, confidential and proprietary information, intellectual property, and any other company data provided to or

accessible by the supplier. Suppliers must promptly report to Elbit America's Senior Vice President and General Counsel any unauthorized use or suspected compromise of company assets, systems, or data.

CYBERSECURITY MEASURES

Suppliers must comply with applicable data privacy laws and must protect the confidential, proprietary, and personal information of others. This information must be safeguarded from unauthorized access, destruction, use, modification, and disclosure, through appropriate physical and electronic security procedures. We expect suppliers to take the necessary information security measures, for both computer systems and portable electronic devices, to protect against malware and unauthorized disclosure of any proprietary information and other program-related information provided by Elbit America. If there is a suspicion that a possible data security breach has occurred, suppliers must immediately report such circumstance to Elbit America's Senior Vice President and General Counsel.

MONITORING AND ENFORCEMENT

RIGHT TO AUDIT

Elbit America reserves the right to periodically review suppliers' and their subcontractors' practices and applicable records to ensure compliance with this Code. Suppliers must comply with our reasonable inquiries related to their work for us and cooperate with audits and investigations.



REPORTING CONCERNS OR VIOLATIONS

Nothing in this Code, or any contract with Elbit America and its employees prohibits, conflicts, or restricts suppliers from communicating, cooperating, filing a complaint with, or making disclosures or a report to, any governmental or law enforcement branch, agency, or entity with respect to possible violations of any law or regulation.

Elbit America prohibits retaliation against anyone for raising a concern in good faith or for participating in an investigation of possible wrongdoing.

Prompt reporting is crucial. Suppliers may ask questions or raise concerns directly:

- Elbit America's Ethics Officer at 540.314.5695
- 24 Hour Ethics Helpline at 866.858.4327 (U.S.)
- Email to ethics@elbitamerica.com

WHISTLEBLOWER PROTECTION AND NON-RETALIATION

Suppliers must provide their employees with ways of raising legal or ethical issues or concerns without fear of retaliation. Suppliers must prevent, detect and correct any retaliatory actions. Elbit America policy prohibits retaliation against any person making a good faith effort to report possible violations of the principles in this Code.

CONSEQUENCES OF VIOLATING THIS CODE

If you do not meet the expectations of this Code, Elbit America may review the business relationship and pursue corrective action subject to the terms of the related purchasing contract.

In the case of a violation of law or regulation, Elbit America may be required to report those violations to the proper authorities. Elbit America reserves the right to terminate our relationship with any supplier under the terms of the existing purchasing contract.

PRODUCT AND SERVICE QUALITY STANDARDS

Elbit America takes quality seriously. Supplied products that meet our standards. This means maintaining effective processes to identify defects, take corrective action, and deliver products that meet or exceed contractual quality requirements.

WAIVER OF OUR CODE

Elbit America's Vice President of Supply Chain and Elbit America's Senior Vice President and General Counsel must approve in writing any waivers, deviations exceptions, or amendments to the Code.

CONTACT US

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