



SUPPLIER CODE OF CONDUCT

Throughout this Supplier Code of Conduct, the terms “Spirit,” “we,” and “our Company” mean Spirit AeroSystems Holdings, Inc., Spirit AeroSystems, Inc., and all of their subsidiaries.

Spirit is committed to upholding the highest standards in all our business dealings with our customers and providing high-quality products and services. Accordingly, we expect our suppliers and their directors, officers, employees, agents, representatives, and affiliates to comply with the requirements set forth in this Supplier Code of Conduct (the “Supplier Code”). This Supplier Code is not intended to be an exhaustive list of all ethical and business conduct requirements that suppliers must follow.

You must have controls, tools, and processes in place that (a) ensure compliance with applicable laws, regulations, and the requirements set forth herein; (b) facilitate prompt discovery, investigation, disclosure (to Spirit and others, as appropriate), and remediation for violations of law, regulations, and the expectations set forth herein; and (c) train your directors, officers, employees, agents, representatives, and affiliates with respect to applicable laws, regulations, and the expectations set forth in herein.

The expectations set forth in this Supplier Code are not intended to conflict with the terms and conditions of your contracts with Spirit. If a contract requirement is more restrictive than this Supplier Code, you must comply with the more restrictive contract requirement.

Compliance with Laws

We expect our suppliers to maintain full compliance with all laws and regulations applicable to their business. We also expect that suppliers who do business with the U.S. government or in support of U.S. government contracts (at any tier), except for suppliers that are providing only commercial items or are a small business as defined in Federal Acquisition Regulation 52.203-13, will maintain their own code of business ethics and conduct that meets the requirements set forth in Federal Acquisition Regulation 52.203-13.

Human Rights

Suppliers must comply with all applicable laws and regulations relating to labor including, without limitation, laws relating to maximum work hours, compensation, collective bargaining, and minimum wage. We expect our suppliers to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture.

Suppliers must not use child labor, forced labor, or human trafficking practices in their performance of work. The term “child” means any person under the minimum legal age for employment where the work is performed. Suppliers must refrain from violating the rights of others and address any adverse human rights impacts of their operations. Suppliers must educate employees on prohibited activities and discipline employees that violate the law or rules, and, if working on government contracts, notify the contracting officer of violations and actions taken against employees where required by the applicable acquisition regulations.

Employment Practices

A. Harassment

We expect our suppliers to ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.

B. Non-discrimination

We expect our suppliers to provide equal employment opportunity to employees and applicants for employment, without regard to race, religion or belief, color, sex, national origin, age, military veteran status, sexual orientation, gender identity, marital or civil partnership status, pregnancy, genetic information, disability, each as recognized by the applicable law(s), or any other characteristic provided by law.

C. Substance Abuse

We expect our suppliers to maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances. We further expect our suppliers to, at all times in the performance of work for Spirit, comply with the applicable Department of Transportation, Federal Aviation Administration, and non-U.S. regulatory body rules governing the use of drugs and alcohol.

D. Retaliation

We expect our suppliers to have a zero tolerance policy with respect to intimidation or retaliation against anyone who in good faith raises a concern, makes a report, or cooperates in an investigation in connection with the matters set forth herein.

Anti-Corruption and Conflicts of Interest

A. Anti-Corruption

Our suppliers must comply with the anti-corruption laws, directives, and/or regulations that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and the Organization for Economic Cooperation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and associated implementing legislation. Suppliers shall not offer or pay bribes, kickbacks, or other similar payments to any person, organization, or government official to secure improper advantages. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity may not violate local law. We expect our suppliers to exert due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of agents or representatives.

Our suppliers must not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives, or others. The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is strictly prohibited. This prohibition applies even in locations where such activity may not violate local law.

B. Antitrust

Our suppliers must not engage in any pricing fixing, bid rigging, market allocation, predatory pricing, or other illegal competition practices. Further, suppliers must not exchange current, recent, or future pricing information with competitors in violation of applicable antitrust or competition laws.

C. Gifts/Business Courtesies

We expect our suppliers to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, our suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules or standards of the recipient's organization, and are consistent with reasonable marketplace customs and practices.

D. Insider Trading

Our suppliers must not trade or enable others to trade in Spirit securities or securities of any other company while in possession of material, non-publicly disclosed information obtained in the course of their business relationship with us.

E. Conflicts of Interest

We expect our suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Spirit. We expect our suppliers to provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between Spirit's interests and (i) the personal or company interests of the supplier or (ii) the interests of the suppliers' directors, officers, employees, agents, representatives, and affiliates, or their respective close relatives, friends, or associates.

Record Keeping and Information Protection

A. Maintain Accurate Records

We expect suppliers to create and maintain fully accurate, auditable records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. Records should be retained based on the applicable retention requirements. Suppliers performing as U.S. government contractors (whether direct or indirect) must comply with the requirements in Federal Acquisition Regulation 4.703. Suppliers that are performing or fulfilling a U.S. government role in their prescribed work must comply with the records requirements of the affected agency and any relevant National Archives and Records Administration requirements that apply to that agency.

B. Information Use and Security

Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures. Such information should not be used 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, including consent, in the case of personal data as defined by the EU General Data Protection Regulation (GDPR), of the data subject.

C. Data Privacy

Suppliers must comply with all applicable data privacy laws including but not limited to the GDPR, confidentiality agreements, and laws governing intellectual property rights, and must protect information (including personal data) from unauthorized access. To the extent suppliers control personal data or sensitive personal data of EU individuals as defined by the GDPR, suppliers must comply with the provisions of the GDPR by only using such personal data for the business purpose for which it was provided, implementing all necessary measures of security and confidentiality in order to protect this type of data, working with Spirit to ensure the compliance with regulations governing the transfer of such data outside the EU, to delete such data at the expiry of any retention periods agreed to between the supplier and Spirit and to reply to any request from data subjects.

D. Intellectual Property Rights

Suppliers must comply with all laws and regulations, as well as any contractual provisions between the parties, that protect the intellectual property rights of Spirit and its customers across all jurisdictions in which Spirit and/or the supplier operates.

E. Cybersecurity Incidents

If a supplier becomes aware of a cybersecurity incident that impacts Spirit, the security of its information, or the security of any personal data covered by the GDPR, the supplier must promptly contact the Spirit Global Compliance Office or Ethics Point, as set forth under Compliance with the Supplier Code and Contact Information, below.

Environment, Health, and Safety

We expect our suppliers to operate in a manner that actively manages risks and hazards (including from regulatory non-compliance and reputational loss), conserves natural resources, and protects the environment.

We expect our suppliers to comply with all applicable environmental, health and safety laws, regulations, and directives. Suppliers should protect the health, safety, and welfare of their people, visitors, customers, and others who may be affected by their activities including the general public.

Global Trade Compliance

A. Security

Suppliers are encouraged to implement the World Customs Organization SAFE Framework of Standards to Secure and Facilitate Global Trade (WCO SAFE Framework) to ensure the security of their supply chains. Global supply chain security programs such as the U.S. Customs-Trade Partnership Against Terrorism and EU Authorized Economic Operators are examples of supply chain security programs that have adopted the WCO SAFE Framework standards.

B. Import and Export

We expect our suppliers to ensure that their business practices are in accordance with all applicable laws, directives, and regulations governing the import, export, and re-export of parts, components, technical data, and provision of services.

C. Anti-Boycott

Our suppliers must not participate in, cooperate with, or further the cause of any unsanctioned foreign economic boycott, in accordance with the 1977 Export Administration Act and the 1976 Tax Reform Act.

Conflict Minerals

Suppliers must adhere to federal laws and regulations requiring reporting companies to make specialized disclosure and conduct due diligence concerning their use of conflict minerals that may have originated in the Democratic Republic of the Congo or an adjoining country. Conflict minerals include cassiterite, columbite-tantalite, gold and wolframite, or their derivatives (tantalum, tin, and tungsten). Under the Securities Exchange Act of 1934, reporting companies (such as Spirit) that manufacture or contract to manufacture products that contain conflict minerals must conduct due diligence on the source and chain of custody of the applicable conflict minerals. We expect our suppliers to develop due diligence processes to meet our obligations to ensure that all

products are responsibly manufactured. For more information on conflict minerals, please see our Conflict Minerals Policy.

Quality

Suppliers must take due care to ensure their work product meets Spirit's and Spirit's customers' applicable quality standards. We expect our suppliers to have in place quality assurance processes to identify defects and implement corrective actions, notify Spirit of any non-conformances in a timely manner, and facilitate the delivery of products and services with quality meeting or exceeding the contract requirements.

We expect our suppliers to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

Compliance with the Supplier Code and Contact Information

Each Spirit supplier is responsible for understanding and complying with this Supplier Code. If a supplier has concerns or questions regarding any matters discussed herein or other ethical or legal compliance issues, the supplier should contact the Spirit Global Compliance Office at P.O. Box 780008, MC 11 70, Wichita, KS 67278-0008 or Compliance@spiritaero.com.

Further, suppliers may confidentially report matters to Ethics Point at <https://secure.ethicspoint.com/domain/media/en/gui/16130/index.html> or by calling the following ETHICSPPOINT 24/7 hotline numbers:

U.S.	1-888-577-9490
UK	08-000328483
Malaysia	1-800-80-8641
France	0800-902500

Spirit reserves the right (and you will permit Spirit) to assess your compliance with the expectations set forth in this Supplier Code by conducting reasonable on-site audits of your facilities or reviewing related documentation and records. Spirit does not assume any duty or responsibility to ensure compliance with this Supplier Code; instead, you acknowledge that you are solely responsible for full compliance with this Supplier Code, applicable laws, and regulations by your directors, officers, employees, agents, representatives, and affiliates.