

**SPIRIT AEROSYSTEMS HOLDINGS, INC.**

**ANTI-HEDGING AND ANTI-PLEDGING POLICY**

**Revised November 2, 2018**

Spirit's anti-hedging and anti-pledging policy is incorporated into its Insider Trading Policy. Specifically, Spirit directors, officers, employees (collectively, "insiders") and their related persons are prohibited from purchasing or selling, or making any offer to purchase or offer to sell, derivative securities relating to Spirit securities, whether or not issued by Spirit, such as exchange traded options to purchase or sell Spirit securities ("puts" and "calls") or financial instruments that are designed to hedge or offset any decrease in the market value of Spirit securities (including but not limited to prepaid variable forwards, equity swaps, collars and exchange funds).

Further, Spirit insiders are prohibited from holding Spirit securities in a margin account or otherwise pledging Spirit securities as collateral for a loan because such securities may be sold by the broker at a time when the insider is aware of material nonpublic information or otherwise is not permitted to trade in Spirit securities.