



# SUPPLIER CODE OF CONDUCT



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**At Bell , Our mission is to change the way the world flies with superior vertical lift that saves lives, preserves freedom and provides customers exceptional value.**

Bell expects suppliers, consultants, sales and service representatives, agents, distributors and other business partners (collectively, "Business Partners") to conduct business in accordance with the highest ethical standards. Bell's Business Partners are an extension of the company and must not conduct business in a manner that could damage Bell's reputation or cause Bell to be in violation of any law or regulation.

## LAWS, REGULATIONS AND CONTRACTS

Our suppliers must act with honesty and integrity and in compliance with all applicable laws and regulations in doing business with government officials in any country, including personnel employed by government-controlled or state-owned enterprises. Suppliers must comply with all flowdown terms, conditions, and other provisions specified in the Bell purchase order. When performing international business, or if the primary place of business is outside of the United States, suppliers must comply with local laws and regulations.

## ANTI-CORRUPTION

We have a zero-tolerance policy for corruption, and prohibit anyone conducting business on our behalf to engage in activities not in concurrence to our policy. Suppliers must use reasonable efforts to promote among their business partners adherence to this Code of Conduct, and exercise due diligence to prevent and detect corruption in all business arrangements. Our suppliers must comply with the anti-corruption laws that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

## GIFTS/BUSINESS COURTESIES

We expect our suppliers in the offering or receipt of any gift or business courtesy not give or receive business gifts unless of nominal value and permitted by law, regulation and the rules and standards of the recipient's organization, and never in cash or cash equivalent. Suppliers should provide meals and entertainment to customers and others only if permitted by applicable laws and regulations, and, to the extent legally permissible, in a manner that is reasonable and customary, never lavish or inappropriate.

## BELL & GOVERNMENT PROPERTY

Suppliers must comply with all flow-downs of Terms and Conditions & Supplier Government Property Manual regarding any Government Property provided by Bell or Government Property manufactured by the suppliers.

## FAIR COMPETITION/ ANTI-TRUST

We expect our suppliers to conduct business in accordance with all applicable anti-trust or anti-competition laws and regulations. This includes avoiding engagement in anti-competitive behavior such as price-fixing, bid-rigging and other forms of illegal collusion by businesses.

## 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 Bell . We expect our suppliers to report to Bell , any situations of potential or apparent conflicts between their personal interests and the interests of Bell.



## EXPORT/IMPORT CONTROL

We expect our suppliers be in compliance with the Wassenaar Arrangement, the World Trade Organization Agreements, and local laws implemented to enact these global trade policies (i.e. the U.S. Export Administration Regulations and International Traffic in Arms Regulations, the Canadian Export & Import Permits Act, the Dutch and Singapore Strategic Goods Orders, the Japanese Foreign Exchange and Foreign Trade Act, and many others).

## COUNTERFEIT PARTS

We expect our suppliers to supply Articles that are not and do not contain suspect/counterfeit parts. Suppliers must develop, implement, and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. Supplier must ensure that their personnel are aware of their contribution to product or service conformity.



## **CONFIDENTIAL/ PROPRIETARY INFORMATION**

Our suppliers should safeguard all sensitive information, including safeguarding proprietary and confidential information disclosed by Bell, physical property or personal data of Bell and its employees and customers which is in their care or possession, and use any such information only for the business purpose for which it was provided

## **FINANCIAL RESPONSIBILITY/ ACCURATE RECORDS**

We expect our suppliers to accurately record, maintain, and report business documentation, including but not limited to, financial accounts, quality reports, time records, expense reports, resumes and submissions to Bell.

## **HUMAN RIGHTS**

We expect our suppliers to treat people with respect and dignity, promote equal opportunity for all, and help create an inclusive and ethical culture. Suppliers must ensure that their personnel are aware of the importance in ethical behavior.

## **HUMAN TRAFFICKING**

We expect our suppliers to not engage in the use of forced labor, indentured labor, involuntary prison labor, or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

## **CHILD LABOR**

We expect our suppliers to ensure that child labor is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed.

## NON-DISCRIMINATION

We expect our suppliers to provide equal employment opportunity to employees and applicants for employment without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability.

## CONFLICT MINERALS

We expect our suppliers to acknowledge our parent company, Textron Inc. , is subject to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act") and the implementing rule promulgated by the U.S. Securities and Exchange Commission (SEC) which will require reporting related to tin, tantalum, tungsten and gold (the "Conflict Minerals") contained in products.

## ENVIRONMENT

We expect our suppliers to apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential risk from regulatory non-compliance, reputational loss, and opportunities for business growth through operational and product stewardship.

## EMPLOYEE, HEALTH & PRODUCT SAFETY

Suppliers must protect the health, safety and welfare of those who may be affected by their activities by complying with all applicable environmental health and safety laws, regulations and directives. Supplier must ensure that their personnel are aware of their contribution to product safety as well as their contribution to product or service conformity.

## HARASSMENT

We expect our suppliers to promote a safe, respectful and productive workplace by establishing and maintaining fair employment practices, including complying with laws that prohibit harassment.

## DRUG-FREE WORKPLACE

Our suppliers must maintain a safe and healthful workplace for their employees free of illegal drugs or controlled substances.

## REPORTING

Employees of our suppliers should have access to an adequate avenue for raising issues or concerns without fear of retaliation.

## SUPPLIER DIVERSITY

Our suppliers should be aware that we often have customer-directed supplier utilization goals that may flow down through the supply chain for various types of small businesses, including small disadvantaged businesses, woman-owned small businesses, HUBZone small businesses, veteran-owned businesses, and service-disabled veteran-owned small businesses. The utilization of these suppliers inspires innovative products and processes and contributes to strengthening the defense industrial base.

## CODES OF CONDUCT & SUB-TIER SUPPLIERS

Commensurate with the size and nature of their business, we expect our suppliers to have management systems in place to support compliance with laws, regulations, and expectations related to or addressed expressly within the Supplier Code of Conduct. We encourage our suppliers to implement their own written code of conduct, and to flow down the principles of a code of conduct to the entities that furnish goods and services to the supplier.



Please feel free to contact the Ethics Office with your comments or questions about Textron Code of Conduct for suppliers and other Business Partners or if there is any need to report a suspected or known violation, you may contact Textron.

Call 1-800-892-9871 (Toll free in U.S. and Canada) or 1-401-457-6006, or at [www.reportineweb.com/Textron](http://www.reportineweb.com/Textron)

**Global Human Trafficking Hotline:** 844-888-Free

**Email:** [Ethics@bellflight.com](mailto:Ethics@bellflight.com)