

ENJET AERO NEWINGTON, INC.

Management Responsibility – Business Ethics Program

1.0 PURPOSE

The purpose of this procedure is to clearly define and promote Enjet Aero Newington, Inc.'s standards for business ethics.

2.0 SCOPE

This procedure outlines the process used to monitor and execute business ethics requirements.

3.0 REFERENCE

RTX Supplier Code of Conduct Training ([Ethics and Compliance | Raytheon Technologies \(rtx.com\)](#))

4.0 RESPONSIBILITY

It is the responsibility of the Quality Manager to establish this procedure.

The management representative is responsible for approving this procedure, and any subsequent changes.

Enjet Aero Newington, Inc. employees and suppliers are required to implement this procedure.

5.0 DEFINITIONS

N/A

6.0 PROCEDURE

6.1 All requirements contained in the RTX Supplier Code of Conduct are requirements of this procedure (if applicable).

6.2 The Quality Manager of Enjet Aero Newington, Inc. is the point of contact for the Business Ethics program. The President and or the Vice President of Enjet Aero Newington, Inc. serve as the alternates. Enjet Aero Newington, Inc. points of contacts (as named) are posted in the break room.

6.3 Employees and/or business partners may report ethical concerns via use of form FM 5.0-4 (Report of a Business Concern). Anonymous reporting is allowed.

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Investigation, disclosure to RTX or other parties (if applicable) and corrective and/or preventive actions

- 6.4 (If applicable) should be prompt. Investigation should be done in a thorough, appropriate and professional manner and respect the concepts of “due process” and “objective evidence”. Retaliation for reporting of concerns will not be tolerated.
- 6.5 Employees and/or business partners may choose to report ethical concerns directly to RTX via the channels listed in the RTX Supplier Code of Conduct.
- 6.6 Enjet Aero Newington, Inc. shall maintain a file of all reported ethical concerns. These records are available for review by applicable customer representatives.
- 6.7 All Enjet Aero Newington, Inc. employees are trained regarding the requirements of this procedure and the RTX Supplier Code of Conduct. Newly hired employees are trained as part of employee orientation.
- 6.8 All new employees are required to complete form 5.0-5 (Disclosure form). On this form employees disclose any conflicts of interest (if applicable) or relationships with RTX employees in a decision making capacity directly affecting Enjet Aero Newington, Inc. (if Applicable).
- 6.9 Enjet Aero Newington, Inc. flows down the requirements of the RTX Supplier Code of Conduct to suppliers whose products or services will be incorporated into RTX purchase orders.
- 6.10 A copy of the RTX Supplier Code of Conduct is posted in the break room along with copies of form 5.0-4 (Report of a Business Concern) and a copy of the Business Ethics Policy. This procedure is contained within the Enjet Aero Newington, Inc. QMS and is available to read by any employee.

7.0 BUSINESS ETHICS POLICY

The Business Ethics Policy is as follows:

Enjet Aero Newington, Inc. Business Ethics Policy

All employees are required to comply with the requirements of the Enjet Aero Newington, Inc. Business Ethics Program, the Enjet Aero Newington, Inc. QMS and all applicable laws and regulations affecting the execution of Enjet Aero Newington, Inc.’s business operations.

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8.0 RECORDS

FM 5.0-4 Report of a Business Concern

FM 5.0-5 Disclosure

Management Review Meeting Minutes

9.0 REVISION HISTORY

DATE	REVISION	PREPARED BY	SUMMARY
10/24/16	Draft	F. Angell	1 st draft
10/29/16	NC	D.Clapp	Initial Release
8/17/19	A	D.Clapp	Removed “annual” and added “new” (All new employees are required...) Para. 6.8
6/23/2022	B	A. Gauthier	Integral Industries, Inc. became Enjet Aero Newington, Inc., references to UTC updated to RTX to reflect Raytheon acquisition, added RTX Business Ethics download link information.

Reviewed By: _____

Date: _____

Approved By: _____

Date: _____