



Code of Ethics



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# Message from the General Counsel and Chief Security Officer

To all members of the StandardAero team:



Welcome to our updated Code of Ethics. This booklet is an important guide that outlines our legal and ethical responsibilities and details the type of behavior expected of all StandardAero team members in any situation.

An ethical culture requires policies that encourage the reporting of ethical, legal, procedural and policy violations. Specifically, the Code requires you to obey the law by following all applicable rules and regulations, and to be honest, open, and maintain a high degree of integrity in all your business dealings.

We strive for an environment of trust where employees feel comfortable raising issues or concerns to their supervisors or management. The StandardAero ethics program is about putting these values and principles into action to determine the correct course of conduct when faced with conflicting options.

StandardAero has an outstanding reputation and that reputation is critical to our success. We've all worked hard to establish our good name and we're justifiably proud of our accomplishments. However, our reputation is at risk every day. One unethical act by any employee – even an action that merely looks questionable – can irreparably damage our brand and standing in the international aerospace community.

Each of us holds the key to the company's integrity. Conducting all business in an ethical manner is not only the right way to act, but will help ensure our long term success. You have the responsibility of making correct choices and sound ethical decisions in every aspect of your job. When you make those right decisions, you do so with the full support and gratitude of the company, our shareholders, and your fellow employees.



Michael L. Kaplan  
General Counsel and CSO  
**StandardAero**

## Our Vision

Our Vision is a critical component of our ethics program because it creates the context within which we work. Our Vision is designed to clarify our highest level purpose before we set out to reach it. The StandardAero Vision describes aspirations for the future, without specifying the means that will be used to achieve the desired end. It is up to all of us to drive towards this achievement within the ethical boundaries defined in this guide.



# Our StandardAero values: Guiding the way we do business

Our Values are the driving force behind our corporate philosophy, ideology, our day-to-day operations and ultimately our success. These Values will guide everything we do and shape who we are and how our customers, our employees, our partners, and the public perceive us. It is upon this foundation that our ethical boundaries operate.



## Integrity

A firm adherence to our code of conduct and ethical values. Implies trustworthiness and incorruptibility, a refusal to deceive in any way, and an active regard for the standards of one's profession.

Demonstrating **integrity** at StandardAero will help govern the social contract with our customers, vendors, partners and one another, and will take precedence over all other values, thus ensuring we meet or exceed all ethical standards in line with the StandardAero code of conduct.

## Urgency

Calling for immediate attention, and action.

Demonstrating **urgency** at StandardAero will ensure we act with appropriate immediacy recognizing the increased pace of business in a global context. Urgency should encourage us to make informed decisions and take actions quickly and efficiently.

## Edge

Vigorous and energetic effectiveness, a keen intensity and desire to win.

Demonstrating **edge** at StandardAero will ensure we maintain commitment and drive around our collective responsibilities and our desire to win and be recognized as the leader in our respective markets. **Edge** will free us to respectfully challenge ourselves and one another, in pursuit of moving our business forward and demonstrating market leadership every day.

## Passionate

A strong devotion to an activity, cause or profession. Implies energetic and unflagging pursuit of a goal.

Being **passionate** at StandardAero will characterize our approach to customers and ensure we approach our respective responsibilities with energy and zeal, never accepting less than what is required to meet commitments and deliver excellence.

## Decisive

To make an educated final choice or judgment, fixing direction in a definitive fashion.

Being **decisive** in StandardAero will ensure we work efficiently, using reason, logic and data to quickly make decisions, take ground and move forward. We will deliver **decisions** with speed, never sacrificing “better” for “best.”

## Accountable

An obligation or willingness to accept responsibility or to account for one’s actions.

Being **accountable** at StandardAero will ensure each of us (personally) takes the necessary actions to deliver on our obligations to employees, customers and shareholders; daily, weekly, monthly, quarterly and annually.

## Dependability

The placement of reliance and trust.

Delivering **dependability** at StandardAero will act to build lasting customer relationships by creating an environment wherein employees and customers will trust and depend on us and each other to support their businesses in a collaborative environment that values teamwork and safety.

## Value

A solid return in goods, services, or money for something exchanged.

Delivering **value** at StandardAero will act as a major competitive advantage. Recognizing that **value** means different things to different people; our responsibility will be to understand and deliver on the **value** equation for each and every customer.

## Excellence

Products, services and behavior that are of a superior quality. World best.

Delivering **excellence** at StandardAero will ensure our success regardless of product, service or customer segment. **Excellence** will be a foundational element of everything we do, and a key differentiator in the market place.

# Who must follow StandardAero compliance policies?

## 1. StandardAero directors, officers and team members

## 2. Subsidiaries and controlled affiliates

Entities in which StandardAero owns more than 50 percent of the voting rights, or has the right to control the entity, are required to adopt and follow StandardAero compliance policies.

## 3. Non-controlled affiliates

Non-controlled affiliates should be encouraged to adopt and follow StandardAero compliance policies.

## 4. Third parties representing StandardAero

StandardAero team members working with third parties, such as consultants, agents, sales representatives, distributors and independent contractors, must:

- Require these parties to agree to comply with relevant aspects of StandardAero's compliance policies
- Provide these parties with education and information about policy requirements
- Take action, up to and including terminating a contract, after learning that a third party failed to abide by StandardAero's compliance policies.

## Your responsibilities and rights

All team members can contribute to StandardAero's culture of compliance by understanding StandardAero's policies, embracing StandardAero's commitment to integrity and acting to enforce compliance and avoid violations.

**Responsibilities:** In order to ensure that StandardAero's Code of Ethics works, we all have certain responsibilities. First, you have the responsibility to make the right decisions. This booklet gives you the rules and provides you with many examples for making the right decision in several situations.

Second, you are responsible and accountable not only for your own ethical behavior, but you are also required to report violations by other team members. If you ever have any concerns that these standards are not being met, or if you need to report a violation, contact one of the following:

- Your manager or functional leader
- Human Resources
- Your local Compliance & Ethics Representative
- The Ethics Director
- The company HelpLine

In many instances, talking to your manager will answer your questions or help you understand the situation better. If you are uncomfortable talking to your manager, the functional group responsible for your specific interest or your local Human Resources office should be able to help you and address your concerns. The Compliance & Ethics Representatives and the resources of the entire StandardAero Ethics Program are always available via the company HelpLine if you need to contact them. If you see – or learn of something – that you think is a violation, you must report it.

**Rights:** You have the right to have any report you make handled in a confidential and professional manner. Your confidentiality will be protected, consistent with legal requirements and the requirement to fully investigate, report and correct any ethical misconduct. Although you may make a HelpLine report anonymously, our investigation will be easier if you identify yourself, and we will be able to inform you of the results of our investigation. In all cases, information is restricted to those directly involved with an investigation or inquiry. You will never be threatened as a result of reporting a suspected violation, and no action will be taken against you for reporting a suspected violation in good faith. Retribution or reprisals against employees for reporting suspected violations are strictly prohibited.

**Results:** If a violation of the Code is discovered, disciplinary action will be taken. That action could range from a verbal reprimand to termination. In some cases the company could pursue civil legal action against the person committing the violation, for any loss or damages. In appropriate situations, criminal charges could be filed. Team members who encourage others to violate these standards, or who deliberately withhold information about a violation of the Code will also be disciplined. Likewise, managers who ignore violations, or who could have prevented a violation through proper supervision, will be disciplined. Any team member who retaliates against an employee making an ethics report will be disciplined.

You have a responsibility to report a violation of the Code, even if you are involved with that violation. The fact that you reported the matter for investigation will count in your favor.



### Commitment to the Code of Ethics

I pledge to make a personal effort to abide by the StandardAero Code of Ethics. Let my signature below stand as evidence of that pledge.

My Signature: \_\_\_\_\_

## Ethics red flags

You should get nervous if you hear:

*"Remember, we didn't have this conversation."*

*"It's an internal part. Who will know?"*

*"No one will ever know."*

*"It doesn't matter how it gets done."*

*"No one will get hurt."*

*"Having this information will destroy the competition."*

*"Well, maybe just this once."*

*"I was never here."*

*"If we don't do it, someone else will!"*

## Ethics integrity check

When in doubt, ask yourself:

1. Are my actions legal?
2. Am I being fair and honest?
3. Will I later second-guess my actions?
4. Will my actions stand the test of time?
5. How will I feel about myself afterwards?
6. How will this look in the morning paper?
7. What would I tell my kids to do in this situation?
8. How would I feel if my mother knew what I was doing?
9. How will my manager react when I brief the team at our next meeting?

## How to report an ethics concern

As with any other business-related issue or question, you are encouraged to use normal procedures by consulting with your manager, the responsible function, or the Human Resources department. If you are uncomfortable with any of these approaches, or you don't feel that it's appropriate to talk with your manager or HR, then you should contact your local Compliance & Ethics Representative.

If you ever want to discuss any ethics question or concern, or if you need to report a violation of the Code, contact your local Compliance & Ethics Representative, the Ethics Director, or use the StandardAero HelpLine. All inquiries are handled in the strictest confidence, and you may make an anonymous report on the HelpLine. In addition to your local Compliance & Ethics Representative, you may reach the Ethics Director in the following ways:

**Call** 210-334-6226

**Email** [ethics@standardaero.com](mailto:ethics@standardaero.com)

**Mail** Ethics Director  
StandardAero  
3523 General Hudnell Drive, Bldg 360  
San Antonio, TX, USA 78226

**The StandardAero HelpLine Number is: 1-866-727-4714 or online at [www.standardaero.alertline.com](http://www.standardaero.alertline.com)**

My local Compliance & Ethics Representative is:

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The Ethics Director is:

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## Penalties for violations

Employees and leaders who violate the spirit or letter of StandardAero's policies are subject to disciplinary action up to and including termination of employment. Misconduct that may result in discipline includes:

- Violating StandardAero policy
- Requesting others to violate StandardAero policy
- Failure to promptly raise a known or suspected violation of StandardAero policy
- Failure to cooperate in StandardAero investigations of possible policy violations
- Retaliation against another team member for reporting an integrity concern
- Failure to demonstrate leadership and diligence to ensure compliance with StandardAero policies and law

**StandardAero absolutely prohibits retaliation.**

## Code of Ethics

This Code of Ethics supports and sustains our business values, principles and mission. This booklet will help you understand your personal responsibility under the Code and will serve as a guide any time you are faced with an ethical decision. Additionally, if you are not sure of how to act, you should ask your manager or local Compliance & Ethics Representative. The Code is divided into four major ethics areas. Each deserves your full attention and understanding:

- Working with customers and suppliers
- Corporate, government and international relations
- In the StandardAero community
- Protecting resources

## Working with customers and suppliers

### Obey the law

Obeying the law is the foundation on which StandardAero's ethical standards are built. All business activities must be based on the principles of honesty, integrity and fair dealing. These are key criteria for the selection and retention of employees to represent StandardAero. Agents, and all other persons representing the company, must agree to be bound by this Code of Ethics.

#### WHAT TO KNOW

We will conduct our business in full compliance with all applicable laws and regulations.



## WHAT TO DO

**Special requirements for government customers:** The laws and regulations related to government contracting are far-reaching and complex. If you deal with government customers in your job, ensure that you are familiar with those requirements.

**Comply with the spirit of the law:** Compliance with the law does not comprise our entire ethical responsibility. We elect to be bound, not only by the letter of the laws, but also by the spirit of those directives.



**Compliance is about obeying laws and regulations. Ethics and integrity are an attitude – what you do when no one’s watching.**

## Improper payments

### WHAT TO KNOW

An improper payment to gain advantage in any situation is never acceptable and exposes you and StandardAero to possible criminal prosecution. StandardAero expressly prohibits improper payments in all business dealings, in every country around the world, with both governments and the private sector.

Improper payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and customer travel and living expenses directly related to the promotion of products or services, or the execution of a contract. These payments are acceptable, subject to specific StandardAero corporate and business guidelines.

## WHAT TO DO

**Before giving a gift**, engaging in customer entertainment or reimbursing customer travel expenses, make sure you understand applicable legal requirements, the customer's own rules and StandardAero corporate and business guidelines. Make sure records of such expenditures accurately reflect the true nature of the transaction.

**Never offer a business courtesy** such as a gift, contribution or entertainment, under circumstances that might create the appearance of an impropriety.

**Never offer, promise, pay or authorize** anything of value (such as money, goods or services) to a government official or employee of a customer to obtain or retain an improper advantage.

**Require any person or firm who represents StandardAero** (such as a consultant, agent, sales representative, distributor or contractor) to comply with this policy and related laws.

**Use due diligence** when selecting persons or firms to represent StandardAero.

## WHAT TO WATCH OUT FOR

**Background information** about existing or potential third-party representatives that indicates:

- Allegations of improper business practices
- Reputation for bribes
- Family or other relationship that could improperly influence the decision of a customer or government official

**Any demand** to receive a commission payment before the announcement of an award decision.

**Any suggestion to direct StandardAero business** through a specific representative or partner due to a "special relationship."

**Any request** to make a payment in a country or to a name not related to the transaction.

**A commission** that is disproportionate to the services provided

*An overseas customer has been invited to travel to visit our training facility at StandardAero expense, but also wants to add a weekend side trip to visit an amusement park. Can we fund the whole trip?*

It depends on many factors, including whether your customer is a government official, the local law, the customer's policies, and other facts. Consult with your manager to determine whether the trip is acceptable.

## Supplier relationships

### WHAT TO KNOW

StandardAero's relationships with suppliers are based on lawful, efficient and fair practices. We expect our suppliers to obey the laws that require them to treat workers fairly, provide a safe and healthy work environment and protect environmental quality. Following StandardAero guidelines helps ensure that our supplier relationships will not damage StandardAero's reputation.

### WHAT TO DO

**Comply with applicable laws** and government regulations covering supplier relationships.

**Do business** only with suppliers that comply with local and other applicable legal requirements and StandardAero guidelines relating to labor, the environment, health and safety.

**Follow government acquisition regulations** when purchasing materials and services for fulfilling government contracts.

**Provide a competitive opportunity** for suppliers to earn a share of StandardAero's purchasing volume, including small businesses and businesses owned by the disadvantaged, minorities, women and disabled veterans.

**Safeguard StandardAero's confidential and proprietary information** with a confidentiality agreement, and safeguard any supplier-provided information protected by any confidentiality agreement.

**Safeguard "personal data"** obtained from suppliers (for instructions, see "Privacy".)

### WHAT TO WATCH OUT FOR

**Choosing suppliers** on any basis other than open, competitive bidding.

**Potential conflicts of interest** in supplier selection, such as accepting improper gifts or other items of value.

**Directing business to a supplier** owned or managed by a relative or close friend.

**Unsafe conditions** in supplier facilities.

**Apparent disregard** of environmental standards in supplier facilities.

**Entrusting "personal data"** or confidential information to suppliers without ensuring that they have appropriate technical, physical, and organizational measures to prevent unauthorized access or use.

*Your low-cost supplier offers good quality and reliable delivery at prices that can't be beat. But you are uncomfortable with the working and living conditions it provides its workers. Shrug it off, or make an issue of it?*

Don't shrug it off. It's a big issue – StandardAero's reputation depends on doing business only with suppliers that deal responsibly with their workers and with their local environments.

# International trade controls

## WHAT TO KNOW

International Trade Control laws affect the transmission of goods, services and technology across national borders. These laws apply to many aspects of StandardAero's operations – not just shipping products. Exchanges of information across national boundaries, including email and web access, are subject to trade controls. The United States also controls the release of technical information to non-U.S. nationals within the United States. It is important that we carefully observe International Trade Control laws in connection with these activities. The StandardAero Office of International Trade Compliance (ITX) handles all issues related to export, import, and other trade control laws and regulations.

## WHAT TO DO

**Follow relevant laws and regulations** of all countries in which you operate as well as StandardAero's policies and procedures as they relate to importing and exporting goods, technology, software, services and financial transactions.

**Provide all relevant information** to ITX to ensure accurate and complete import declarations. Ensure StandardAero or its agent provides accurate and complete information to government authorities.

**Check the export classification** of the product, software or technology prior to export to determine whether special authorization is required. Ensure that all shipping documents are prepared and submitted correctly and reflect the proper shipping authorization or permit.

**Obtain prior approval** or licensing for international transfer of military equipment and technology. Such transfer is restricted by the U.S. International Traffic in Arms Regulations (ITAR) and has specific reporting requirements. Exports of ITAR-controlled hardware or technology must be approved by ITX.



**Prepare and submit proper import documentation** to avoid costly and embarrassing fines and seizures by government customs departments.

**Screen your transactions** against all applicable rules that restrict transactions with certain sanctioned countries, persons and prohibited end uses.

**Screen all your business partners,** suppliers and parties involved in your international transactions against government-provided watch lists.

**Do not cooperate with any restrictive trade practice** or boycott that is prohibited or penalized under law. It is illegal to enter into an agreement to refuse to deal with potential or actual customers or suppliers, or otherwise to engage in or support restrictive international trade practices or boycotts. If you are ever asked to sign a contract or service agreement that states that StandardAero will not use certain vendors, or which restricts which countries we can ship goods through, contact ITX immediately for guidance on how to proceed.

#### WHAT TO WATCH OUT FOR

**Any facts, or “red flags,”** that suggest your customer may be attempting to evade International Trade Control laws.

**Evasive, reluctant or otherwise unsatisfactory answers** by a customer to questions about end use, end user, delivery dates or delivery locations.

**Transactions involving an embargoed country,** a citizen or representative of an embargoed country or an individual or entity subject to government sanction.

**Invoices on imported goods** where the price shown does not reflect the full value, the description of the goods is not complete, or the country of origin is not correctly identified.

**Any payment to the exporter** or benefiting the exporter that is not included in the invoice price or otherwise reported.

**Transfer prices** between related parties that fail to cover appropriate costs and profits.

**Use of an import tariff classification** that does not seem to describe the imported goods accurately.

**Designation of StandardAero as the importer of record** (party responsible for an importation) without maintaining processes to comply with import laws.

**Entry of goods under a preferential duty program (GSP, NAFTA, etc.)** without supportive procedures assuring compliance with the program's requirements.

*You find a less expensive non-domestic supplier that looks promising. Can you email technical drawings to see if this new company has the capabilities you need?*

It depends on the export classification of the technical information and the policy on retaining new suppliers. Check with ITX for specific guidance on the classification issue.



# Money laundering prevention

## WHAT TO KNOW

People involved in criminal activity – e.g., terrorism, narcotics, bribery, and fraud – may try to “launder” the proceeds of their crimes to hide them or make them appear legitimate. More than 100 countries now have laws against money laundering, which prohibit conducting transactions that involve proceeds of criminal activities. A related concern is that legitimate funds may be used to finance terrorist activity – sometimes called “reverse” money laundering.

StandardAero is committed to complying fully with all anti-money laundering and anti-terrorism laws throughout the world. StandardAero will conduct business only with reputable customers involved in legitimate business activities, with funds derived from legitimate sources. Each StandardAero business is required to take reasonable steps to prevent and detect unacceptable and suspicious forms of payment. Failing to detect customer relationships and transactions that place StandardAero at risk can severely damage StandardAero’s integrity and reputation.

## WHAT TO DO

**Comply with all applicable laws** and regulations that prohibit money laundering and support and financing of terrorism, and that require the reporting of cash or suspicious transactions. Understand how these laws apply to your business.

**Know your customer.** Collect and understand documentation about prospective customers, agents and business partners to ensure that they are involved in legitimate business activities and their funds come from legitimate sources.

**Follow company policy** concerning acceptable forms of payment. Learn the types of payments that have become associated with money laundering (for example, multiple money orders or travelers checks, or checks on behalf of a customer from an unknown third party).

**If you encounter a warning sign** of suspicious activity, raise your concern with the Finance department and be sure to resolve your concern promptly before proceeding further with the transaction. Ensure the resolution is well documented.

### **WHAT TO WATCH OUT FOR**

**A customer, agent or proposed business partner** who is reluctant to provide complete information, provides insufficient, false or suspicious information, or is anxious to avoid reporting or record keeping requirements.

**Payments** using monetary instruments that appear to have no identifiable link to the customer, or have been identified as money laundering mechanisms.

**Attempts by a customer** or proposed business partner to pay in cash.

**Early repayment** of a loan in cash or cash equivalents.

**Orders, purchases or payments** that are unusual or inconsistent with the customer's trade or business.

**Unusually complex deal structures,** payment patterns that reflect no real business purpose, or unusually favorable payment terms.

**Unusual fund transfers** to or from countries unrelated to the transaction or not logical for the customer.

**Transactions involving locations** identified as secrecy havens or areas of known terrorist activity, narcotics trafficking or money laundering activity.

**Transactions involving foreign shell or offshore banks,** unlicensed money remitters or currency exchangers, or non-bank financial intermediaries.

**Structuring of transactions to evade record keeping** or reporting requirements (for example, multiple transactions below the reportable threshold amounts).

**Requests to transfer money** or return deposits to a third party or unknown or unrecognized account.

# Privacy

## WHAT TO KNOW

A growing number of countries are more stringently regulating the collection and use of consumers' personal data (names, home and office contact information, and other data). In addition, many countries regulate personal data of company representatives in business to-business transactions. A few countries even regulate the privacy of information relating to corporations. StandardAero is committed to handling personal data responsibly and in compliance with applicable privacy laws.

## WHAT TO DO

**Learn and comply** with privacy laws and regulations, the privacy policies of StandardAero and any contractual obligations that apply.

**Collect and use personal data** for legitimate business purposes only.

**Use "anonymous" data** (names removed and not identifiable) or "aggregated" data (summarized so as not to be identifiable to an individual) instead of personal data where appropriate or required.

**Limit data access** to people who need it for a legitimate business purpose.

**If you learn that personal data has been used improperly** or if you learn that the security of any system or device containing personal data has been compromised, immediately notify your manager, HR or local Compliance & Ethics Representative.

## WHAT TO WATCH OUT FOR

**Inadequate access or security controls** for personal data, such as distributing personal data to a larger group than legitimately needed, or leaving printouts with personal data at a printer, copy machine or fax machine for others to see.

**Sharing of personal data** with unaffiliated third parties, such as vendors or suppliers, who lack appropriate security safeguards or restrictions on information use.

**Transfers of personal data** between countries, without considering applicable legal requirements.

## Corporate, government and international relations

*We are entitled to a large payment from a government customer if we certify that project installation has been completed. We're not sure whether a few small items have been installed yet, but they should be soon. It's getting close to year-end, and we'd like to book the payment. Can we submit our invoice and certification now?*

No, you cannot submit the invoice and certification until you are certain that the entire installation has been completed in accordance with the contract. Submission of an incorrect certification could subject the company, and you personally, to criminal penalties. Therefore, it is extremely important that all certifications submitted to the government be current, accurate and complete.

## Political activity

Participation in local and national politics is a freedom to be cherished and exercised. All StandardAero team members are encouraged to vote and fully participate in their local political processes. It is important for team members and the company to be good citizens.

### WHAT TO KNOW

Involvement in civic and community activities is important and encouraged. However, that participation must not be done on company time or at company expense.

### WHAT TO DO

**Political activity:** StandardAero encourages its team members to become involved in civic affairs and to participate in their political process. However, that involvement and participation must be on an individual basis, on the team members' own time, and at their own expense. If you speak out on public issues, you must make it clear that you are speaking only for yourself and not for the company.

**Political contributions:** Many countries limit or prohibit political donations from businesses. If you do volunteer work for a candidate for public office, it must be on your own personal time, and contributions must be from your own funds.

## Government business



StandardAero conducts business with national governments and government-owned enterprises. In the course of our work, we frequently interact with government agencies, officials and public international agencies. In every instance, StandardAero team members must apply the highest ethical standards and comply with applicable laws and regulations, including certain special requirements associated with government transactions.

Hiring or recruiting current or former government employees is subject to a variety of complex, frequently changing rules. Human Resources must be consulted prior to discussing employment with any current or former government employee.

### WHAT TO KNOW

Team members will comply with all government contracting regulations and requirements. We have a responsibility to know the law regarding the employment of current or former government personnel, and we will comply with those restrictions. We respect the ethical standards with which government employees must comply, and we will honor those requirements as well as the StandardAero Code of Ethics.

### WHAT TO DO

**Abide by applicable laws** and regulations related to working with governments, particularly special requirements associated with government contracts and transactions.

**Be truthful and accurate** when dealing with government officials and agencies.

**Provide accurate pricing.** If you are involved with preparing government bids or proposals, or negotiating resulting contracts, you are responsible for providing accurate, complete and current cost or pricing data. Any information that would affect the price negotiations must be revealed as soon as it is known.

**Assign costs to the appropriate project** or overhead accounts. Be sure that costs which are not allowed to be charged to government projects are kept separate from those that are. Most government contracts will not reimburse contractors for money spent for advertising, entertainment or other specified expenses.

**Adopt processes that ensure** reports, certifications, statements and proposals are current, accurate and complete and that contract requirements are adequately identified and communicated to the responsible parties.

**Do not make any unauthorized substitutions** for contracted goods and services or deviate from contract requirements without the written approval of the authorized government official.

**Require** anyone providing goods or services for StandardAero on a government project or contract (such as consultants, sales representatives, distributors or suppliers) to agree to comply with the intent of StandardAero's Code of Ethics.

**Do not ask for special procurement information** that is not available to all competitors. Government procurement must rely on fair and equal competition. It is important to avoid even the appearance of unfair advantage. It is better to pass up an opportunity to bid than risk being debarred from doing business with a government.

**Hiring former government employees:** There are complex laws that cover the terms for hiring former government employees, including military officers. For example, certain government employees must file a disqualification statement with the government before beginning employment negotiations with a company, and you should ask to see a copy of this statement before becoming interested in hiring such an individual. All employee search and hiring activities must be coordinated through your Human Resources office.

## WHAT TO WATCH OUT FOR

**Special requirements** that apply to transactions with governments, including anti-kickback laws that prohibit subcontractors from providing or offering any inducement in order to receive or keep work under government contracts.

**Incorrect or unauthorized cost-charging** on government contracts.

**Deviations from contract requirements** or unauthorized contract substitutions, such as failure to perform required tests and inspections.

**Submission of inaccurate or incomplete** cost or pricing data when this data is required by the government.

**Violating government regulations** that establish gratuity restrictions, recruiting and hiring restrictions, or certification procedures.

**Negotiating for employment** with a government official or government official's family members while the official has the ability to influence decision making about contracts with the government.

## Corporate business

StandardAero is committed to vigorous, ethical and lawful business competition based on the merits of our services and products. Our team members must never use any illegal or unethical methods to compete or to acquire competitive information. All statements and representations made to prospective customers in proposals, bids or contract negotiations must be accurate and truthful. StandardAero will always be in full and complete compliance with antitrust laws and other statutes that prohibit restrictive trade agreements.

### WHAT TO KNOW

We will conduct all business competition in an ethical and legal manner. Team members are strictly forbidden to use any illegal methods of obtaining information on competitors or competitive bids. We will forfeit any business that cannot be obtained honestly. Our business should be based on the value of the services we provide to a customer.

### WHAT TO DO

**Client, subcontractor, supplier and agent relations:** In all of your business dealings you must establish that you are fair and ethical with an understanding of the law. If you are entering an unfamiliar aspect of business, you must learn the applicable laws and regulations, and try to work out potential problems in advance. It is your duty to make consultants, subcontractors and suppliers aware of the company's standards. Our agents, representatives and consultants have the same obligation under this Code as employees; suppliers and subcontractors are encouraged to support our efforts in this area.

# Competition laws

## WHAT TO KNOW

**Antitrust laws:** Regulations to protect trade and commerce from unfair restraints are generally referred to as “antitrust” laws. Some of the activities prohibited include price fixing, monopolies, and price discriminations. Certain types of conduct between competitors are always illegal, and you must never, directly or indirectly:

- Agree on prices
- Agree on any other term of sale
- Allocate or divide up customers or markets
- Agree on production limits
- Agree on, or rig competing bids

**Other antitrust considerations:** Other conduct with competitors or suppliers may also be illegal under the antitrust laws. In the situations below, consult with your manager and the contracts department prior to proceeding:

- Requirements contracts
- Exclusive dealing arrangements
- Customer or supplier boycotts
- Tying or bundling together different products and services

## WHAT TO DO

**Comply** with all applicable competition laws and regulations as well as competition law decrees, orders and agreements with any competition regulator about how business will be conducted.

**Do not** propose or enter into agreements with anyone (including competitors, agents, brokers or customers) regarding whether to submit a bid or the terms of a bid where there is an understanding that the bid is submitted for any purpose other than winning the business.

**Avoid contacts** of any kind with competitors that could create the appearance of improper agreements or understandings.

**Do not** propose or enter into agreements or understandings with customers that restrict the price or other terms at which the customer may resell or lease a product or service to a third party.

**Do not** propose or enter into agreements or understandings with suppliers that restrict the price or other terms at which StandardAero may resell or lease any product or service.

**Consult** with the legal department to help reduce the risks of noncompliance in the evaluation of any proposed merger, acquisition, joint venture or any other business arrangement that could raise competition law issues

## WHAT TO WATCH OUT FOR

**Exclusive arrangements** for the purchase or sale of products or services.

**Bundling** of goods and services.

**Agreements that restrict a customer's choices** in using or reselling a StandardAero product or service.

**Technology licensing** agreements that restrict the freedom of the licensee or licensor.

**Selective price discounting** to only certain customers.

**Distribution arrangements** with competitors.

**Agreements to add a StandardAero employee** to another entity's board of directors.

*There is a big account I think my business could land – but only if we partner with one of our competitors to go after it. Can we work together without violating the competition laws, or should I let this opportunity pass?*

Partnering with a competitor for a specific project may be permissible when the result is an improvement in the solution offered to the customer; for example, when both companies together can provide an offering that neither would be able to supply separately. Always seek legal advice before agreeing to work with a competitor on a joint proposal.



## In the StandardAero community

*You're dispatched to repair part of an aircraft's hydraulic system. Unfortunately, the customer cannot completely shut down the system for repairs as planned since other flight controls are being tested. The customer asks you, as a favor, to do this work with no lock-out. It is unlikely the parts you are working on will move. You feel confident that you can do it with minimal risk. Can you do the customer this favor?*

Absolutely not. Both StandardAero policy and safe work practices require that remotely activated machinery be locked-out before work is commenced.

## Fair employment practices

### WHAT TO KNOW

Fair employment practices do more than keep StandardAero in compliance with applicable labor and employment laws. They contribute to a culture of respect. Beyond legal compliance, we strive to create an environment considerate of all team members wherever StandardAero business is being conducted.

### WHAT TO DO

**Base employment decisions** on job qualifications (e.g., education, prior experience) and merit. Merit includes an individual's skills, performance, values, leadership and other job-related criteria.

**Make all employment-related decisions and actions** without regard to a person's race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status or other characteristic protected by law.

**Provide a work environment** free of harassment and bullying.

**Respect the privacy rights** of employees by using, maintaining and transferring personal data in accordance with StandardAero's Privacy Policy. (While seeking to maintain employee privacy, StandardAero reserves the right to monitor use of company property, including computers, email, phones, proprietary information, etc., in accordance with applicable law.)

**If a conflict arises** between the requirements of this policy and the laws, customs or practices of a particular area, consult with management and the legal department to determine the most appropriate course of action.

**Show respect:** All team members want and deserve a workplace where they feel respected, satisfied, and appreciated. We will not tolerate harassment or discrimination of any kind.

**Practice diversity:** As a global enterprise, we respect cultural diversity and recognize that the various countries in which we do business may have different legal provisions pertaining to the workplace. It is your responsibility to comply with the requirements specified by law at all company locations.

**Comply as tenant or subcontractor:** Whenever StandardAero is co-located with a customer or prime contractor, our employees will respect and comply with the business practices, workplace requirements and ethical rules of our host, as well as this Code. In instances where this Code conflicts with the ethical rules of our host, contact the Ethics Director for guidance on how to proceed.

## WHAT TO WATCH OUT FOR

**A hostile work environment** (for example, telling jokes or displaying materials that ridicule or offend a member of a particular race or ethnic group.)

**Making unwelcome sexual advances** to another employee or person with whom you work.

**Violating a labor law.**

**Refusing to work**, or otherwise cooperate with, certain individuals because of their race, religion, sex, or other characteristic protected by law.

**Disclosing employment data** to a person who does not have the business need, authority or the subject's consent.

**Taking an adverse action** against a team member (e.g., firing) because the team member has raised a concern about a violation of policy or law.



# Environment, health and safety

## WHAT TO KNOW

Protecting the environment and the health and safety of team members is the law – and StandardAero believes it's also the right thing to do. Through management leadership and team member commitment, StandardAero works to conduct its operations in a safe manner that minimizes environmental impact. This policy affects all company activities – not just managing our waste and emissions, but everything we do – for example, selling products, driving a car on company business, acquiring a new business or providing customer service.

## WHAT TO DO

**Comply** with all applicable environmental, health and safety (“EHS”) laws and regulations, and StandardAero EHS policies.

**Create and maintain** a safe working environment and prevent workplace injuries.

**Assess EHS legal** implications and risk to StandardAero’s reputation before starting a new activity, venture or project, selling a new product, acquiring a new business or participating in a hazardous business.

**Eliminate unreasonable EHS risks** from StandardAero’s facilities, products, services and activities.

**As practicable, reduce toxic and hazardous materials;** prevent pollution; and conserve, recover and recycle materials, water and energy.

**Continue to improve our EHS systems** and performance as an integral part of StandardAero’s operational strategy.

**Present ideas** that support the goals of this policy to your manager or your facility’s EHS contact.



**Promptly alert your manager** or EHS contact of unlawful or unsafe conditions.

### **WHAT TO WATCH OUT FOR**

**Unsafe activities and conditions**, such as:

- Failure to use personal protective equipment (shoes, safety glasses, hearing protection, gloves, monitors, etc.)
- Unlabeled or unapproved chemicals
- Exposed or unsafe wiring
- Blocked fire or emergency exits
- Unsafe driving, or failure to wear seat belts or follow StandardAero's driving policies
- Working in high places without fall protection
- Working beneath heavy, suspended loads, or improperly using cranes
- Working on electrical or powered equipment without following safety (e.g., "Lock-out, tag-out") procedures
- Working unsafely at a customer site
- Potential exposure to serious infectious diseases
- Disabling safety controls or guarding on equipment and machinery

**Failure to comply** with health, safety or environmental regulations and procedures.

**EHS complaints** from team members, customers or neighbors.

**Unreported** environmental, health or safety hazards or accidents.

**Failing to respond** promptly to concerns about possible product/flight safety issues.

**Missed opportunities** for reducing waste and toxic materials.

**Failing to follow** StandardAero policies for the management, shipping, transportation, import/export and disposal of hazardous materials and chemicals.

**Risks and liability** associated with new acquisitions as well as both new and existing products, processes, services and ventures that present increased legal liability and reputational risk.

**Inadequate security** procedures or practices that may present safety threats to a facility and/ or team members.



# Security and crisis management

## WHAT TO KNOW

In an age of increasing terrorist threats, protecting the security of our people, workplaces, information and businesses is critical. It is critical to have rigorous and comprehensive security and crisis management plans. StandardAero's plans includes measures for preventing terrorist and other criminal acts covering our team members, facilities, information, information technology (IT) infrastructure, business continuity and crisis management. In addition, team members must take every precaution to avoid doing business with terrorists or those that support terrorist activity.

## WHAT TO DO

**Implement rigorous plans** to address the security of team members, facilities, information, IT assets and business continuity.

**Participate in** your facility's emergency planning and emergency drills.

**Comply with** the entry and exit rules at StandardAero facilities, including wearing the appropriate badge.

**Protect access** to StandardAero facilities from all but authorized personnel.

**Protect IT assets** from theft or misappropriation.

**Create and maintain** a safe working environment – this includes identifying and reporting indicators of workplace violence.

**Comply with** global immigration rules when traveling internationally, and ensure that employees or visitors who work for you or are closely associated with StandardAero also comply.

**Comply with** all StandardAero international travel policies. Obtain appropriate pre-clearances to designated countries.

**Conduct** appropriate background checks on new hires and contractors, wherever allowed by law.

**Ensure proper business** continuity plans are prepared for an emergency.

**Screen** all customers, suppliers, agents and dealers against appropriate terrorist watch lists.

**Report any apparent** security lapses to your manager or your facility's security officer

### WHAT TO WATCH OUT FOR

**Individuals at StandardAero facilities** not wearing appropriate badges.

**Unsecure IT assets**, such as laptops, servers, etc.

**Inadequate protection** of hazardous materials.

**Unsecure areas of a facility** where only authorized personnel are allowed to enter.

**Security complaints** from team members, customers or neighbors.

**Unauthorized entry** to a facility.

**Doing business** with a customer, supplier or any third party without sufficient screening.

## Protecting assets

*A representative from a potential new customer or supplier has given you his card, containing his name and contact details. Is it OK to put this information in a database where other StandardAero personnel can access it?*

If you collected this data in a country regulated by a “personal data protection” law – for example, most countries in Europe – you may be prohibited by law from using or sharing the information where the person to whom the data pertains has not granted express consent. If you are not sure, consult with your manager or the legal department.



# Intellectual property

## WHAT TO KNOW

StandardAero's intellectual property is one of its most valuable assets. All team members must work to safeguard our patents, trademarks, copyrights, trade secrets and other proprietary information. At the same time, it is critical that we respect the valid intellectual property rights of others. Unauthorized use of others' intellectual property can expose the company and even individual StandardAero team members to civil law suits and damages, including significant fines and criminal penalties. A key to protecting our intellectual property and, at the same time, guarding against these risks, is the timely and reasonable review of new StandardAero products, services, processes and software, for possible inventions and trade secrets and infringement of the intellectual property rights of others.

## WHAT TO DO

**Identify and protect** StandardAero intellectual property.

**Follow the requirements** of StandardAero's procedures in handling any unsolicited ideas from outsiders as well as any employee ideas.

**Respect valid patents**, copyrighted materials and other protected intellectual property of others.

**Consult** with the legal department concerning necessary licenses or approvals to use protected intellectual property of others such as patents, trademarks or proprietary information (i.e., information that is in confidence and not publicly known or generally available).



**Consult** with company legal counsel before:

- Soliciting, accepting or using proprietary information of others
- Disclosing StandardAero proprietary information
- Permitting others to use StandardAero intellectual property.

**Understand your responsibilities** to the company regarding new inventions, ideas that you may develop as a StandardAero team member and the company's information.

**Comply** with the guidelines for use of StandardAero trademarks and trade names.

### **WHAT TO WATCH OUT FOR**

**Accepting proprietary information** belonging to others, without first consulting the legal department.

**Discussing StandardAero proprietary information** with customers or suppliers.

**Using another company** to develop new products or software without a written agreement in place covering ownership and other rights in the developed intellectual property.

**Passing on**, for technical or management review, an outsider's suggestion for a new product, product feature, service or name, without following StandardAero procedure.

**Introducing, or providing information** about, a new product or service before patent applications have been filed or a decision has been made not to file an application.

**Introducing a new product** or service, or new product or service name, before checking for patent or trademark infringement.

**Threatening** anyone suspected of infringing any StandardAero intellectual property without first consulting with company legal counsel.

**Employing a new person**, especially a person who previously worked for a competitor, without putting in place safeguards to prevent the person from inadvertently disclosing or using the proprietary information of the previous employer.

*One of our products will soon have a new feature that will really help it outperform the competition. A big customer of mine is pressing me to describe the new feature to her now, because she needs to make her buying decisions this week. Can I show the customer the new feature?*

No. Showing the feature to the customer before a patent application is filed could result in the loss of StandardAero's right to obtain a patent.



# Information

## WHAT TO KNOW

Team members are required to protect the company and act responsibly with the sensitive information of competitors, customers and other stakeholders. Information created by StandardAero in the normal course of business is considered company confidential and proprietary, and may not be used for personal purposes or for the benefit of persons outside the company. Information entrusted to us by suppliers and customers is also confidential and may not be disclosed outside the company. The obligation to preserve confidential information continues even after employment ends.

## WHAT TO DO

**Private and proprietary information:** If you have access to technical, financial or commercial information that is sensitive or belongs to the company, its clients or suppliers, you are responsible for safeguarding it. You must ensure that only those people with a legitimate need to know have access to trade secrets, cost data, marketing plans, computer programs, new development projects and other business information.

**Personal information:** If you have access to team member data, such as personnel files or other personal information, it is your duty to protect team member privacy in accordance with company policies and all applicable privacy regulations.

**Classified information:** You are required by law to safeguard any government classified information with which you may work. If you are required to work with classified materials, your local security officer will instruct you in the procedures you must follow to safeguard these materials. The responsibility to protect information, both private and classified, continues even if you leave the company, and you must account for and return all documents upon termination of employment.

# Controllership

## WHAT TO KNOW

Controllership embodies three fundamental elements: **1)** rules that classify transactions and balances appropriately; **2)** systems and controls that protect assets and accumulate information consistently and correctly; and **3)** financial and transaction reporting that is timely and unbiased. Controllership creates the right environment for disclosing timely, reliable and accurate information to government agencies and the public.

## WHAT TO DO

**Follow StandardAero's general accounting procedures**, as well as applicable generally accepted accounting principles, standards and regulations for accounting and financial reporting.

**Ensure that financial and nonfinancial information** and operating metrics are reported accurately and in a timely fashion.

**Maintain complete, accurate and timely** records and accounts to appropriately reflect all business transactions.

**Safeguard all company assets** (physical, financial and informational).

**Provide timely, candid forecasts** and assessments.

**Maintain sound processes** and controls.

**Comply with StandardAero's document management procedures** as well as all applicable laws and regulations relating to the preservation of documents and records.

**Preserve documents and records** relevant to pending or reasonably foreseeable litigation, audits or investigations, and as directed by the legal department.



## WHAT TO WATCH OUT FOR

**Financial results that seem inconsistent** with underlying performance.

**Inaccurate financial records**, such as overstated travel and living expense reports, or erroneous time sheets or invoices.

**Transactions that are inconsistent** with good business economics.

**Absence of controls** to protect assets from risk of loss.

**Circumventing review** and approval procedures.

**Inadequate routines and controls** to preserve documents (including email) for pending or reasonably foreseeable litigation, audits and investigations.

**Disposal of documents** without knowing what is being discarded or whether the documents are subject to legal preservation requirements.

**False or exaggerated statements** in email, presentations or other documents.

*I'd like to persuade my customer to purchase a new product before they really need it, because it will help me exceed my quarterly sales goals. I could offer them a discount, and we could hold the product at our facility until they need it. If the customer agrees, can I do this?*

No. This can be damaging both economically (giving away margin and putting strain on a customer relationship) and from an accounting standpoint (not technically a sale, as the rules for revenue recognition have not been met).

## Information recording and reporting



StandardAero is committed to accuracy and reliability in the preparation, preservation and maintenance of all business records. Transactions between the company and outside individuals and organizations must be promptly and accurately entered in our books in accordance with generally accepted accounting practices and principles. It is a crime to knowingly present a false claim to a government, and a false claim is fraud in the private sector. Ensure all documents that you prepare are correct. You must also assist auditors who are checking our records and not block their efforts.

### WHAT TO KNOW

All company records, reports, pricing data, invoices and other business documents must be prepared accurately and honestly. We will make fair, accurate, timely and understandable disclosures in public communications.

### WHAT TO DO

**Accurate records:** All business records and financial statements must be maintained in reasonable detail, must accurately reflect the transaction that occurred, and must conform both to applicable legal requirements and to the StandardAero system of internal controls.

**Business accounting:** If you are responsible for preparing information on a project, group of projects, or for your activity as a whole, be sure that what you provide represents an accurate picture of the way things are going or are likely to go. The company must be able to rely on your information to plan for its future needs, and arrangements with financial institutions are founded on the accuracy of this information.

**Time and attendance reports:** You are personally responsible for accurately reporting the time you spend at work, on vacation, on holiday, or on other paid leave. In addition, managers are responsible for confirming, or in some cases, assigning all time charges to the correct project or overhead account without regard for the remaining available budget. Accuracy and honesty in time and attendance reporting are absolutely essential.

**Test/training records:** If you are responsible for conducting tests, you are responsible for accurately recording the test results. Both the company and our customers must be able to rely on the truthfulness and accuracy of test results and any follow-up corrective action.

**Public disclosures:** We must ensure that public communication by the company is fair, accurate, timely, and understandable. This obligation applies to all team members with any responsibility for preparing, drafting, reviewing, signing or certifying the information contained in those reports. Communications must be open, yet not compromise proprietary information or violate confidentiality.

**Accounts payable and receivable:** If you are responsible for preparing invoices or for providing information to people who do, you must be sure that the invoice correctly reflects the product or service sold and the terms of the sale. If you are responsible for making payments to consultants, subcontractors, or suppliers, you must make certain that the product or service received is exactly what the purchase agreement says it is. Both of these transactions must be handled so that there is no opportunity to hide kickbacks, bribes or other improper payments or receipts.

# Conflicts of interest

## WHAT TO KNOW

On the job or in your free time, nothing you do should conflict with your responsibilities to StandardAero. No activity at work or at home should hurt StandardAero's reputation or good name. Misusing StandardAero resources or influence is also prohibited. Even when nothing wrong is intended, the appearance of a conflict can have negative effects. It is crucial to consider how your actions might appear, and to avoid the perception of a conflict of interest.

## WHAT TO DO

**Disclose** activities, financial interests or relationships that may either present a conflict or the appearance of one.

**Use good judgment** in all personal and business dealings outside your StandardAero job.

**Avoid actions or relationships** that may cause potential conflicts or create the appearance of a conflict with your job or StandardAero's interests.

**Do not misuse** or use for personal gain StandardAero resources, intellectual property, time or facilities – this includes office equipment, email and computer applications.

**Do not personally accept** any opportunities in which StandardAero could have an interest, that you discover as a result of your StandardAero position, or your use of StandardAero information or property.

**Get approvals** before accepting officer or director positions with an outside business while you are a StandardAero employee.



## WHAT TO WATCH OUT FOR

**Financial interests** in a company where you could personally affect StandardAero's business with that company (for example, a customer, supplier or investment).

**Part-time jobs** which you perform using StandardAero hours, equipment or materials.

**Gifts** of other than nominal value from suppliers, customers or competitors, particularly if you're making decisions (on StandardAero's behalf) that involve them.

**Personal discounts** or other benefits from suppliers, service providers or customers that the public or your StandardAero peers do not receive.

**Directing business** to suppliers when you know they are owned or managed by family members or close friends.

**Misusing StandardAero resources**, your position or influence to promote or assist an outside activity.

**Hiring, promoting or directly supervising** a family member or close friend.

**Personal relationships** that may conflict with your StandardAero responsibilities or compromise company interests.

*Your cousin owns a company that supplies raw materials to a StandardAero business. Is that a prohibited conflict of interest, no matter what StandardAero business you're in?*

This is not explicitly prohibited, but the conflicts of Interest policy requires that you disclose the situation to StandardAero management, and that you not attempt to influence StandardAero business with your cousin's company.

# Insider trading

## WHAT TO KNOW

In the course of your job, you may learn of material information about StandardAero or other companies before it is made public. You may simply overhear a hallway conversation or come across a memo left at a copy machine. Using this information for your financial or other personal benefit or conveying this information to others constitutes a violation of this policy and may even violate the law. This includes buying or selling the securities of any company about which you have material non-public information and giving this “inside information” to anyone else who might base financial trades on the information you’ve shared.

## WHAT TO DO

**Do not buy or sell** the securities of any company, either directly or through family members or other persons or entities, while you are aware of inside information about the company. (This is known as “insider trading.”)

**Do not recommend or suggest** that anyone else buy or sell the securities of any company while you have inside information about the company.

**Maintain the confidentiality** of company information and do not convey information to anyone outside the company unless it is necessary for the company’s business activities.

**If the nature of your job** and your position in the company subject you to additional requirements relating to buying and selling securities (such as pre-clearing personal trades) learn and follow all of those requirements.

**If questions arise**, consult the legal department before trading in the security or disclosing company information.



## WHAT TO WATCH OUT FOR

**Non-public information which, if disclosed**, would reasonably be expected to affect the price of a security or would influence your decision to buy, sell or hold a security, such as an earnings announcement or a prospective acquisition announcement

**Buying or selling a security** because you hear or learn of information at work that you think will make the price go up or down once it's publicly announced

**Engaging in trading activity** around the time of a significant company announcement

**Discussing StandardAero business** with family and friends

**Talking about what you're working on** or where you're going on company business or who visited the office

*I was chatting with my brother and mentioned that I had an upcoming business trip to close the deal for StandardAero to acquire Company X. Could this create a problem?*

Yes, if Company X is a public company and the possible acquisition of Company X has not been publicly announced. If your brother trades Company X stock based on your tip, both of you could be charged with insider trading.











# Notes





[www.standardaero.com](http://www.standardaero.com)