



Executive Message

Dear Fellow Stakeholder, NMG's Code of Ethical Conduct lays the foundation for our company's commitment to the highest ethical standards. The Piglia Family and NMG Senior Leadership Team have worked to establish a culture reflective of our Company's values and integrity. The Code gives guidance for business practices and decision making for all NMG Stakeholders worldwide.

The Code of Ethical Conduct is very important to the continued success of the company. Making ethical decisions positively impacts our employees, customers, suppliers, and communities. The Code guides us to align our decisions with our deeply held values.

Many of the products we make go into commercial aircraft. The safe operation of these aircraft depends upon our ability to design and create quality product. We have an obligation to ensure the safety of the travelling public by maintaining the highest level of quality. Making ethical decisions supports our mission of quality.

We'd like to request that you consider the Code to be a starting point for your ethical decision making. This information, in conjunction with other resources, will provide a solid foundation to align your values and behavior with those of the company.

We hope that you find this Code useful as a primer for ethical decision making both now and in the future.

Sincerely,

A handwritten signature in blue ink that reads 'Michael A. Piglia'.

Michael A. Piglia
Chief Executive Officer

A handwritten signature in blue ink that reads 'Darryl A. Piglia'.

Darryl A. Piglia
Chief Operating Officer



Preface

“Do what is right.” NMG employees normally apply these words to their decision making process every day while at work. But “Do what is right” has a far broader scope than that. It’s about safely providing our customers with quality products on-time. But it’s also about doing what is right more generally i.e., complying with the law, making moral and honorable decisions, and treating each other respectfully.

The NMG Code of Ethical Conduct is one of the ways we put “Do what is right” into practice. It is the foundation for establishing the highest possible standards of ethical business conduct and more importantly, ensuring that the work we do at NMG will be measured against them.

Just as we strive for excellence in our manufacturing and engineering operations, we strive for excellence in the way we conduct business; with integrity and ethical decision-making. Our strong commitment to such a high level of ethical standards helps us attract and retain the best workforce, build great products, and attract loyal customers. Respect, loyalty, and trust among employees are both the foundation for our success and something for which we need to continually strive.

NMG stakeholders are expected to be familiar with this code and abide by it in letter and spirit. Each of us has a responsibility to incorporate the principles of the Code into our work each day. If you ever feel that another stakeholder may be falling short of our commitment, we need to hear from you. You are encouraged to bring forward all questions, comments, and concerns regarding this code.

Who must abide by the code?

NMG’s ownership sanctioned the development of this code.

All stakeholders must abide by the code including employees, ownership, and advisory board members. We will favor suppliers and contractors who abide by their own Code of Ethical Conduct which is similar to ours.



What If I Have a Code-Related Question or Concern?

If you have a question or concern you may contact your manager, a member of the human resources team, or the Corporate Compliance Officer (CCO). You are encouraged to address ethical concerns with your manager; however, you can make a report of a suspected violation or concern through “Submit an Ethics Concern” link on the company Intranet.

<http://intranet/Lists/Ethics%20Concern%20Form/NewForm1.aspx?Source=http%3A%2F%2Fintranet%2FLists%2FEthics%2520Concern%2520Form%2FAllItems%2Easpx&RootFolder>

If you are an outside entity such as a vendor or a customer and have a question or concern, you may contact a member of the team you interact with to refer your question or concern appropriately.

No Retaliation

NMG will not tolerate retaliation against any employee or stakeholder who reports or participates in an investigation of a possible Code of Ethical Conduct violation. If you have cause to believe that you are or have been retaliated against, please contact your manager, a member of the human resources team, or the CCO. Alternatively you can report retaliation through “Submit an Ethics Concern” link on the company Intranet.

Customer Commitment and Values

Our customers value NMG not only because we deliver quality product safely and on-time, but because we hold ourselves to a higher standard in how we operate. The Senior Leadership Team has defined the following as our core values:

1. Integrity

We believe in holding ourselves to the highest standards of honesty and openness in all that we do: trust is essential.

2. Commitment

We believe in being responsive to others; we tackle our assignments with energy and relentlessly follow through until the job is complete.

3. Partnership

We believe our success depends upon building and maintaining strong team member, customer, supplier, industry, and community relationships; we want to be viewed as a trusted and valued partner.

4. Teamwork

We believe in working together; trusting and supporting one another in accomplishing our goals.

5. Innovation

We encourage and welcome new ideas and support our team members who try new approaches, even though they may fall short.

6. Respect

We believe in the "golden rule"; treat others as we want to be treated.

7. Continuous Improvement

We believe in constantly challenging ourselves to make every aspect of our business better every day!

Regulatory Compliance

NMG recognizes its responsibility to comply with applicable laws, regulations, and legal requirements. It is impossible for anyone to know all aspects of every applicable law; however, you should understand the major laws and regulations that apply to your position. Training is provided to each employee about regulations applicable to his/her job. For example, all employees receive safety orientation. This orientation provides insight into OSHA regulations and gives employees the proper tools to keep us in compliance. A few specific laws often impact the work we do and can very easily be unintentionally violated. These laws are mentioned at various points in this code.

Financial Integrity

Financial integrity is a core aspect of regulatory compliance and ethical conduct. Fiscal responsibility is a core value of corporate professionalism. Financial integrity and fiscal responsibility extend beyond accuracy in financial reporting. The money spent on behalf of NMG is not ours; it belongs to the company and ultimately ownership. Fiscal responsibility ensures the success of the company which provides a livelihood that our employees depend on. Every person at NMG has a role in ensuring that; funds are appropriately spent, financial reports are complete, accurate, and timely, and internal accounting controls are followed. This happens every time we issue a purchase order, enter a sales order, use a company credit card, set up a new vendor, report hours worked, log on to a job, issue a customer credit, issue a supplier debit, etc.

A core NMG value is Integrity. We can maintain our integrity by using company funds responsibly. Prior to incurring an expense on behalf of the company, make sure that the cost is reasonable, directly related to company business, and supported by appropriate documentation. Always record the business purpose (e.g., if you purchase a meal on behalf of NMG, always record in our expense reimbursement tool the full names and titles of the people who attended as well as the reason for the dinner) and comply with other submission requirements. If you're uncertain about whether you should spend money or submit an expense for reimbursement, check with your manager. Managers are responsible for all money spent and expenses incurred by their direct reports, and should carefully review such spend and expenses before approving.

If your job involves the financial recording and reporting of financial transactions, ensure that you've adequately familiarized yourself with all applicable policies. Immediately notify the CFO or Controller if you think that transactions are not being recorded correctly or financial reports are inaccurate.

You should never interfere in any way with an audit of NMG's financial records. Our integrity depends on the reliability and accuracy of our financial records. You should never falsify any record or account. This includes; though is not limited to, hourly time reporting, clocking onto

direct/indirect, credit card expense reports, expense reimbursement reports, and other records.

If you suspect that falsification or other irregular accounting behavior has occurred, no matter how small, immediately report the behavior to the CFO, Controller, or using the "Submit an Ethics Concern" link on the company Intranet.

Contractual Authority

Prior to executing an agreement on NMG's behalf; appropriate review and revision of the agreement needs to be completed by an employee who is trained in contract review. Entering an agreement on behalf of NMG can have lengthy and/or costly ramifications and should only be executed when the following criteria are met:

- You are a member of the senior leadership team or have been delegated by a member of the senior leadership team to execute a specific type of document.
- The contract has been reviewed and revised by the CCO **OR** the type-specific contract has been evaluated by a delegated employee trained in contract review.
- You have studied the contract thoroughly, completely understand the terms, and have determined the contract is in the best interest of NMG

NMG does not permit the use of verbal agreements and requires that all contractually binding agreements be in writing and signed by an employee with authority to do so.

Procurement

As NMG continues with its pattern of growth, our base of suppliers, vendors, and service providers will continue to grow with us. We should always strive for the best possible deal for NMG remembering that the best possible deal brings the most value. Value is represented in not just cost but also quality, timeliness, service, reliability, and terms & conditions. Ensuring that any deal brings the best value almost always requires soliciting competing bids. The supply chain team is thoroughly trained in evaluating purchases appropriately. Should you have the need to procure equipment, services, or product; the Supply Chain team is usually the best avenue to making such a purchase.

Record Retention

It's important that we keep records for an appropriate length of time. Our Business Management System provides the basic framework for record retention while specific customers, products, and regulations may be more stringent. Prior to disposal of records,

ensure that no product, legal proceeding, regulation, or company policy would require further retention. Ensure that confidential information is disposed of appropriately. Shredding is the preferred method of destroying paper records. NMG's IT Department can provide guidance on disposal of digital records.

Competition

The U.S. and many other countries have "antitrust" laws designed to promote free and fair competition. Generally, these laws prohibit; arrangements with competitors that restrict trade and infringement of intellectual property rights. These laws specifically prohibit certain conduct and can result in not only severe penalties for NMG, but also in your personal prosecution. Several examples of prohibited conduct include:

- collusion with competitors to set prices
- rigging bids
- agreement with competitors or to allocate customers or markets
- agreement with competitors to boycott a supplier or customer
- disclosing competition-sensitive information (e.g., costs, prices, contract specifics, market distribution, etc.) with competitors
- pursuing a strategy with the sole intent of harming a competitor

The application of antitrust laws to a specific situation can be quite complicated. NMG is committed to competing both fairly and legally. If you suspect that anyone at the company is violating competition laws, notify your manager, a member of the senior leadership team, or "Submit an Ethics Concern" on the company Intranet.

Respect in the Workplace

We support the right of all employees to work in a respectful environment free of harassment, unlawful discrimination, intimidation, bias, or violence of any kind. Doing so gives employees the opportunity to reach their fullest potential. Creating such an environment starts with each individual employee maintaining respectful relationships with coworkers. All employees are expected to abide by the Standards of Conduct at Work as defined in the most current edition of the Employee Handbook.

It is the policy of NMG to afford equal employment opportunity to all individuals. The Company is committed to providing employment opportunities without regard to race, creed, color, religion, gender, sexual orientation, national origin or ancestry, qualifying disability, age, genetic information, veteran or military status, or any other legally-protected classification. NMG shall recruit, hire, train and promote persons in all job classifications in accordance with this principle of equal employment opportunity. NMG also shall make all other employment decisions in

accordance with this principle of equal employment opportunity, including personnel actions relating to compensation, benefits, transfers, layoffs, return from layoff, Company-sponsored training, education and social and recreation programs.

NMG prohibits unlawful harassment in any form – verbal, physical, sexual, or visual. If you believe you've been harassed by anyone at NMG, or by a NMG partner or vendor, you should immediately report the incident to Human Resources. Similarly, supervisors and managers who learn of any such incident should immediately report it to Human Resources. HR will promptly and thoroughly investigate any complaints and take appropriate action.

NMG recognizes that the presence of alcohol and drugs in the workplace endangers the safety of employees and visitors, impairs productivity and threatens the Company's business reputation. If you believe that you have a drug or alcohol addiction, the Company strongly encourages you to seek appropriate treatment **before** you are subjected to drug/alcohol testing or disciplinary action. The Company will support you via our Employee Assistance Program (EAP) and other means as appropriate. The fact that you are seeking treatment does not excuse you from the requirements of this policy. Reasonable suspicion, required testing, etc. regarding drug and alcohol use will all be handled in accordance with the Drug Free Workplace Policy as outlined in the Employee Handbook.

The Company is committed to providing its employees and visitors an environment that is safe, secure and free from threats, intimidation and violence. Examples of "violence" include but are not limited to physically harming another, shoving, pushing, harassing, intimidating, coercing, brandishing weapons, and threatening or talking of engaging in those activities.

The Company specifically prohibits the possession of weapons by any person while on Company property. This ban includes keeping or transporting a weapon in a vehicle in a parking area, whether public or private. Weapons include guns, knives, explosives, and other items with the potential to inflict harm. Employees are also prohibited from carrying a weapon while conducting business on behalf of the company.

Gifts, Donations, and Bribery

The expectation in regards to bribery is simple; don't bribe anyone, at any time, for any reason whatsoever. Even when dealing with the private sector, you should still be careful with gift giving, paying for meals, paying for entertainment, or providing other business courtesies. Even if a gift or other extended courtesy is not a bribe, we want to ensure that it could not be perceived as such. Limit the value and frequency of such courtesies to the greatest extent possible.

When dealing with government officials; gift giving, paying for meals, paying for entertainment, or providing other business courtesies becomes even more problematic. Government Officials include; those in public office, political candidates, employees of

government entities, and employees of political parties. Many U.S. and foreign laws strictly prohibit offering or giving anything of value to government officials to influence their official capacity or secure unfair advantage. With government officials, the courtesies on behalf of the Company extend beyond those defined for the private sector; including travel, political contributions, and charitable contributions.

Health and Safety

NMG recognizes that safety is critical to our employees, families, communities, customers and company; and take our responsibility to provide the facilities, equipment, tools, procedures, safety programs, and training necessary for employees to work injury and illness free very seriously. We work diligently to comply with all applicable government laws and regulations as set forth by OSHA.

Employees have the responsibility to work safely for the benefit of themselves as well their co-workers. This responsibility includes: following appropriate safety rules, planning each work activity using appropriate risk assessment, using good judgment and skills, and having a sincere dedication to safety. Employees should not start work until they fully understand what work is to be done and how to do it safely. Employees are expected to be engaged in the Company's safety management process, which includes communicating with all necessary parties about safety-related behaviors and conditions, and bringing to management's attention those issues which require their involvement and support. Safety concerns should immediately be brought to the attention of your manager or supervisor or may be submitted via the "Submit an Ethics Concern" link on the company intranet.

All visitors to NMG are expected to abide by company health and safety policies. Visitors are responsible for ensuring their own safety as well as the safety of NMG employees.

Environment

NMG is committed to managing our buildings, operations, and property in a manner that reduces negative environmental impacts and in compliance with all applicable EPA regulations. The Company will use appropriately regulated waste management contractors to ensure safe management of hazardous and non-hazardous waste, and will continue to implement waste prevention, reduction, reuse and recycling efforts.

Corporate citizenship

NMG is committed to being a good corporate citizen. Complying with laws and regulations is a good start; however, we truly exhibit our citizenship by taking a proactive role in improving the quality of life of our employees and bettering the communities we serve. We encourage our employees to help us identify areas where we can enhance our involvement in supporting the communities in which we do business and to strengthen our corporate stewardship.

Third party representation

Parties which have contractual obligations to NMG such as sales consultants, legal representatives, financial representatives, contractors, suppliers, etc. are not authorized to represent NMG without written permission. Additionally, these parties may not represent NMG if their conduct is known to be in violation with this code. Third parties and their employees are expected to abide by this code whenever representing or working with NMG. Before beginning a business relationship, it is highly recommended that third parties be under a signed non-disclosure agreement to support confidentiality.

Trade Controls

International and U.S. trade regulations specify where and to whom NMG can send or receive products, services, and/or data. Although a number of government agencies regulate trade, the two primary ones that we work with are the Department of State and Department of Commerce. The State Department regulates trade via The International Traffic in Arms Regulations (ITAR) while the Commerce Department does so via the Export Administration Regulations (EAR). These laws and regulations are very complex and apply:

- To movement of products, services, or data into/out of the U.S. and to non-US persons.
- to movement of products, services, or data into other countries when they contain components or technology of U.S. origin
- What constitutes an “import” or “export” under the law is pretty broad. For example:
 - Allowing access by non-U.S. persons to U.S. technical data can be considered an “export” even if the access occurs in our facility on U.S. soil
 - Transporting technical data on your laptop, or tools or equipment in your luggage, may be an export and import.
 - In its simplest form, US persons are defined as US citizens and permanent legal residents (AKA “Green Card” holders). All others are considered non-US persons. There are additional entities that qualify as US persons, but the preceding definition covers most cases you are likely to encounter.

Ultimately, if you are involved with the movement of NMG products, services, technology, etc. out of the U.S. or to a non-U.S. person; work with your manager to ensure that the transaction occurs within the permissible framework of the law. All employees are provided with general awareness export control training. Should you need further guidance, please contact the CCO.

Employment Law

NMG is aware that each employee chooses where to commit his/her talent and dedicate his/her time. It is our goal to go well above and beyond what the law requires in our treatment of employees and their families to fully engage them in making us their “Employer of Choice”.

Those with direct reports are provided with training to better understand employment laws. Should further guidance be needed, please contact a member of the Human Resources Team.

Conflict of interest

All employees have the basic duty to act in the best interest of NMG. The following are some basic guidelines to which employees may refer in deciding what constitutes a conflict of interest. No list is all-inclusive; therefore, it is essential for employees to use good judgment in all situations that may pose a conflict.

- Each employee shall refrain from unauthorized disclosure of non-public information concerning the nature of products, operations, investments, acquisitions or contracting activities.
- No employees should make unauthorized use of NMG resources for personal benefit or for the benefit of another person.
- Employees should not accept, directly or indirectly, favors from customers, vendors, or competitors of NMG. Favors are defined as gifts, payments, loans, services, travel expenses, or anything else that exceeds a nominal monetary value of \$50. Anything over this amount should be tactfully declined or returned.
- The acceptance of reasonable business meals and the exchange of reciprocal courtesies are acceptable under the guidelines of this policy if they are neither frequent nor lavish. These should remain within the business setting.
- Employees should spend their working hours conducting Company business.

Employees should not be in the employ of competitors or customers as an extra or part-time job. In any situation where an employee is uncertain of whether his/her conduct may create a conflict of interest, the employee should contact a member of management or the Human Resources Department and disclose the details of the situation before proceeding to act. When faced with a situation that could potentially be a conflict of interest, ask yourself the following questions. Would this.....

- Create an incentive for me, my friends, my family, or an affiliated business at the expense of NMG?
- Create a perception by others that there is an incentive for me, my friends, my family, or an affiliated business at the expense of NMG?
- Harm my reputation?
- Harm NMG or NMG's reputation?
- Hinder my ability to do my job?
- Embarrass me if it appeared in media?
- Embarrass our ownership or other NMG stakeholders if it appeared in the media?

If you answered “yes” to any of these questions, the matter would likely create a conflict of interest and you should either avoid it or seek guidance before proceeding to act. Should you discover what could be perceived as a conflict of interest, please forward the matter to a manager or submit your concern on the company Intranet.

Confidential information

While NMG prides itself on world-class operations, our innovations are not usually of great interest to the general public. It is in the best of interest of all stakeholders for any -media attention NMG receives to be positive. Confidential information, premature information, or misinformation that is released to the media, our competitors, or our customers can tarnish our reputation and prove costly in other ways. Our responsibilities extend beyond not revealing confidential NMG material – we must:

- Appropriately mark, keep secure, and destroy NMG confidential material;
- Take equal measures with confidential information received from others under non-disclosure agreements
- Safeguard our trade secrets and other confidential intellectual property.

NMG's “confidential information” includes, though is not limited to, financial, product, process, supplier, and customer information. It is very important to ensure that confidential company information remains just that, confidential. Do not disclose “inside” information without proper authorization. When authorized to disclose confidential information in conjunction with a specific project, disclosure should be on “need to know” basis only and under the protection of a properly executed non-disclosure agreement. In addition, when the information to be disclosed may represent an “export” or a defense-sensitive product, the recipient of the information may be required to undergo screening prior to receiving the confidential information. Please ensure you conduct appropriate due diligence and have an appropriate non-disclosure agreement in place before disclosing sensitive information.

As with many matters, it may not always be explicitly clear what may and may not be disclosed. Use your best judgment in deciding what to and not to disclose. If still in doubt, seek guidance from company leadership or the CCO.

Be mindful when bringing visitors into a NMG facility. As we do work for many customers, some of whom compete with one another, we must assure that visitors from one customer are not given access to products and technology of another customer. We must further assure that non U.S. persons are not given access to export controlled products and technology without the proper government issued licenses.

Lastly, some of us could find ourselves having a relative or other personal relationship with an employee of our competitor, supplier, customer, or even another employee. Common sense should still apply in this case. Don't disclose NMG confidential information and don't solicit it from them either.

Just as it is important to not disclose NMG confidential information, it is of greater importance to not disclose confidential information from our customers, end users, and suppliers. Do not accept confidential information from any outside entity without having an appropriately-executed non-disclosure agreement approved in accordance with company procedures. Even under the protection of a Non-Disclosure Agreement (N.D.A) it is still a wise business practice to limit acceptance of information to the scope of the project you are working on.

While we are always striving to be an industry leader in what we do, we want to achieve this by our own merit, not by competing unfairly with our competitors. We don't want their confidential information. The same applies to any employee's former employer. Should you come in to possession of a competitor's confidential information, you should disregard it and notify a member of the senior leadership team for appropriate corrective action.

As previously stated, you are already aware that you are expected be very careful in disclosing company information and are not to do so without authorization. It's also a good practice to withhold posting your opinion or information about NMG in any public forum, even when not confidential, unless public relations is part of your job. Any comment you make can be perceived to represent the company as opposed to you as an individual. Never discuss the company with the media unless you've been directed to do so by a member of the senior leadership team. Please refer to the employee handbook section titled "Technology Usage & Control" for more information.

Protecting Company Assets

NMG prides itself on the culture we've built in our commitment to being the employer of choice. Employees receive additional compensation when the company meets or exceeds profitability expectations. Our above-average benefits and bonuses are dependent upon our continued financial success. We ensure this success by protecting company assets, safeguarding company information, and using financial resources wisely.

NMG's intellectual property (I.P.) rights (product designs, manufacturing processes, logos, trade secrets, and "heard knowledge") are our highest-valued assets. Misuse can deflate their value. Misuse of any NMG I.P. should be promptly reported to a member of the senior leadership team or using "Submit an Ethics Concern" link on the company Intranet. Misuse of company intellectual property can quickly deflate the value of the company as a whole and cause us to lose our competitive edge.

Just as we expect the I.P. rights of NMG to be respected by our competitors; we expect our stakeholders to respect the I.P. rights of others. Should you have external proprietary information made available to you and have doubts about whether or not its use is acceptable, please contact the CCO.

Second to our I.P., our next greatest assets are our tools and equipment. We're given the appropriate equipment to do our jobs efficiently and effectively. We can only do this if everyone uses the equipment responsibly. Company funds, equipment, physical assets, and other resources are for company use. Personal use of company assets usually does not contribute to the furtherance and growth of our business and in most cases is not permissible. If you are unsure about whether you are appropriately using company assets, please contact a manager.

NMG's information technology infrastructure including; hardware, software, data, and interface devices are a critical aspect of our company's property, both physical and intellectual. Use of the network is expected to be compliant with the "Technology Usage & Control" section of the Employee Handbook. If you have any reason to believe that the security of our network has been compromised in any way, please promptly report it to the I.T. department.

Security

Just as at home, take precautions to secure your personal belongings. Take equal precautions to secure company facilities and company equipment that has been issued to you. Always wear your badge visibly while on site. If you see someone without a NMG badge, please ask for it.

Information Technology and Employee Privacy

Anything done using NMG information technology infrastructure (computer, mobile device, email, network, etc.) or stored on site (letters, memos, documents, etc.) may be disclosed internally or externally. Information and employee communications transmitted using our I.T. infrastructure may be monitored and remain property of the company and may be disclosed at the discretion of company leadership.

Employee Personal Information

We collect and store personal information from NMG employees at each worksite including but not limited to; diagnostic tests (hearing, vision, respirator surveillance, etc.), demographic information, and beneficiary information. This data may only be accessed in accordance with NMG internal policies and local regulatory law.

Conclusion

NMG aspires to be world-class in the work it does and the preferred choice of employer. It is not possible to foresee every possible ethical dilemma we might face. This code and our values coupled with our own good judgment allow us to maintain a high standard of integrity. All NMG stakeholders are expected to abide by the code in both letter and spirit. If you are ever unsure about what course of action is the best, consult your manager or a member of the senior leadership team.

Most importantly, remember, "Do what is right."