



# HOW WE BUILD

## Code of Conduct



# Code of Conduct

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## MESSAGE FROM OUR CEO

Our long-term success as a business depends on many factors, including strategic vision, inspired leadership, customer-centric innovation, and world-class products and services. Our success equally depends on our reputation for honesty, integrity, and good corporate citizenship with our employees, customers, suppliers, and other business partners. We earn that reputation every day, and even a single misstep can have repercussions for years to come.

This **Code of Conduct** reflects how we have built and continue to build our business – it identifies our principles, guiding business practices, rules for the workplace, and dedication to our employees, customers, business partners and communities. It provides guidance on the role each of us plays in ensuring the company lives up to its principles and does the right thing. In addition, it provides helpful resources for all of us when we have a question or face a difficult ethical situation.

Our reputation for integrity is, and must always be, the cornerstone of our business. Always remember that business results, strategic goals, and objectives must never be allowed to overtake our corporate standards of ethics and business conduct. Our ethical standards go well beyond minimum legal requirements; they reflect and define us as a company and as individuals. Whatever the circumstances, we strive to do the right thing and hold others who act on our behalf to the same high standards.

Thank you for your continued commitment to our Company and to the principles for which it stands.



Steve Frediani  
President and CEO  
The Heico Companies



# HOW WE BUILD: Our Principles



## Who We Are

The Heico Companies is a family of companies comprised of over forty individual businesses operating through 70+ different entities skilled in manufacturing, construction, and industrial services. The Heico Companies uses a decentralized management structure, which allows each operating company to maintain its own culture and identity. Yet all of our companies share the same core values centered around honesty, integrity, and good corporate citizenship. It is from this common set of core values that we designed this Code of Conduct.

References in this Code to “Heico” or the “Company” include Heico Holdings, Inc., The Heico Companies, LLC and each of their operating companies. While we may have different names, identities, and cultures, every Heico employee is responsible for living up to our Code of Conduct every day.

## Our Culture

Our belief in our people and their capabilities drives our corporate structure by fostering entrepreneurship and innovation — a key driver of our long-term growth. Underlying our culture are the values that form the bedrock on which our company culture is built. This Code embodies those values and lays out the expected standard governing the behavior of all Heico employees, regardless of the operating company they work for or their location around the globe.

All team members are expected to comply with both the letter and the spirit of our Code. This means we must take it as a personal responsibility to understand and comply with all of the policies, laws and regulations that apply to our job, even if we feel pressured to do otherwise.

Many of the principles described in this Code are general in nature, and the Code

does not cover every situation that may arise. Nor is the Code the exclusive source of guidance and information regarding the conduct of our business. Use common sense and good judgment in applying this Code. In addition, consult applicable policies, procedures, and resources in specific areas as they apply. These resources will be linked throughout the Code. None of us have all the answers, and that is fine — provided we seek to find the best answers available.





# The Role of Our Leaders



**Our leaders have a heightened responsibility to:**

**Build** a culture of integrity and openness

- Make sure employees understand our ethical standards and feel comfortable raising questions or reporting concerns without fear of retaliation
- Always work with integrity

**Exemplify** the highest standard of conduct and ethical behavior

- Set the “tone at the top” for our employees
- Achieve results the right way

**Lead** with empathy and make ethical decisions, regardless of whether handling concerns or dealing with contrasting opinions or challenging developments

**Address** Code violations and wrongdoing promptly when they occur

## Understand Your Significance

- **When a leader speaks, the Company speaks**
- **When a leader acts, the Company acts**
- **When a leader fails to act, the Company has failed to act**



## Our Employees

Our people are our most valuable resource. We believe in treating each other with respect and in fostering an atmosphere of open communication, honesty, and **speaking up** if something is not right.

We endeavor to treat our fellow employees the same way we wish to be treated ourselves. We perform at our best when our work environment welcomes individuals with different backgrounds, characteristics, perspectives, values. We believe that having a broad-based workforce filled with diverse backgrounds, differences, ideas, skills and experience helps us attract and retain the best talent, who can deliver even more value to our customers.



### We Win Together

- We have a passion to win. We set ambitious goals, consistently deliver, and celebrate our success.
- We understand, challenge, believe in and learn from each other.





# HOW WE BUILD: Our Workplace



## Empowering Our Employees

We seek to maintain a productive workplace where everyone is empowered to do their best work. Employees thrive when all are treated fairly and with dignity and respect.

Abusive, harassing or discriminatory conduct is unacceptable, whether verbal, physical or visual, and whether directed at or by each other, our business partners or our job applicants. This includes anything that could constitute a hostile work environment, such as offensive jokes, derogatory comments based on racial or ethnic characteristics or sexual advances.

We will not tolerate discrimination on the basis of age (as defined under applicable law), color, gender identity, genetic information (including testing and characteristics), national origin or ancestry, physical or mental disability, pregnancy (including childbirth and related medical conditions), race, religion, sex, sexual orientation, veteran status, uniformed service member status, or any other consideration protected by applicable law.

If you experience or witness harassment or discrimination, report it. We prohibit retaliation against anyone for making a good-faith complaint or for honestly participating in an investigation.

Visit the Policy Center on SharePoint to view Employment Resources.



## How to Act in Accordance with Our Values:

We want to keep our workplaces safe, positive, and respectful. That way we can focus on what matters—doing great work. Maintaining a respectful workplace requires everyone's participation. We ask that all employees:

- Treat others with courtesy, respect, and fairness
- Avoid making comments or taking actions that might seem hateful or hurtful
- Speak up when you see or hear others behaving improperly
- Not discriminate against anyone based on any classification stated in Company policy or protected by law
- Not harass anyone verbally, visually, or physically (this means avoiding offensive jokes, inappropriate conduct, and threats)
- Avoid retaliating against anyone in the Company
- Promptly report any instances of discrimination, harassment, or retaliation



## We Comply with Labor and Employment Laws:

- The Company complies with all applicable employment laws, including wage and hour laws and laws relating to fair compensation and minimum-age guidelines
- We recognize that our employees have the right to freedom of association and the right to decide whether to bargain collectively
- We promote fair labor practices



**Q:** While eating lunch in the Company breakroom, Bill tells his boss John that he is planning to retire at the end of the month. John says “Well, it’s about time you old goat! You should have been put out to pasture long ago.” Most of the people in the breakroom laugh when John says this.

*Are John’s comments acceptable?*

**A:** NO – these comments, even if made as a joke, are age-based and could be offensive and viewed as discriminatory.

# Workplace Safety

Visit the Policy Center on SharePoint to view the Safety Policy and Workplace Violence Policy.

We strive for a culture of proactive safety by:



Complying with all applicable workplace safety laws and regulations



Prohibiting violence, threats, or physical intimidation in our workplace



Promoting an alcohol and drug free workplace



Identifying potential hazards



# HOW WE BUILD: Protecting the Company's Interest



## Corporate Opportunities Belong to the Company

Business opportunities that arise or are discovered in the course of our work for the Company must not be taken for individual gain but instead pursued for the benefit of the Company. Employees must also refrain from inappropriately using Company property, information, funds, equipment, or their positions for improper personal gain, or to compete with the Company.

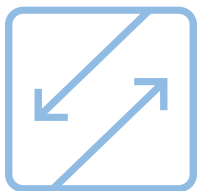
## Conflicts of Interest and the Importance of Disclosure

We put the Company's interests first. Outside activities and personal or family relationships can become a conflict of interest when our actions or interests could make it difficult to perform our work objectively or effectively.

Employees must promptly disclose any activity or transaction that might give rise to a conflict of interest, or even the appearance of a conflict of interest. Employees will then receive guidance on how to proceed.



## Conflicts of Interest



Conflicts of interest can take many forms, such as a manager supervising a family member or having a romantic relationship with a direct report. A conflict of interest can also occur when our obligation to the Company might be impacted by our outside activities, such as: financial interests, board memberships or other similar interests.



# Is it a Potential Conflict of Interest?

Visit the Policy Center on SharePoint to view the Conflict of Interest Policy and Conflict Disclosure Policy.



Kelly's neighbor asked her to "pull some strings" and get him a job at the Company. Kelly works in HR. Could this be a conflict?

## **ANSWER:**

*Yes, it could be. Kelly should tell her neighbor that job openings are posted on the Company website and he can apply there. She should not attempt to influence the Company's decision on whether to hire her neighbor.*

Jose is a production supervisor. He really needs more workers and they are having a difficult time hiring quality people. He suggests that HR should use a staffing firm run by his close friend as he knows they do good work. Is this a conflict?

## **ANSWER:**

*As long as Jose discloses that this is his friend's firm and he is not the decisionmaker or involved in reviewing or approving their invoices if the staffing firm is selected, there is no conflict.*



Malcolm got promoted to supervisor. He had been working on the same shift with his brother Dean. Can he continue to work on the same shift with Dean or is this a conflict?

## **ANSWER:**

*This would be a conflict of interest that Management, Human Resources and Compliance will need to work together to address.*



# Is it a Potential Conflict of Interest?



Navi works in IT. The Company purchases all IT and computer-related equipment through several preferred vendors. Navi's friend works at a company that sells this equipment. He asks Navi to get his company listed as a preferred vendor. In exchange, Navi would receive a small commission on any equipment purchased by the Company. Can Navi agree to this?

## **ANSWER:**

*No. This would be a conflict of interest. Navi could tell his friend how to apply to become a preferred vendor but he cannot be involved in the decision and he could not accept any commission based on the Company's purchases.*

Lucia's sister has a catering business that has a great reputation in the community. When the Company is planning its summer family picnic, Lucia suggests they hire her sister's business. She does not disclose her connection. Is there a conflict?

## **ANSWER:**

*Yes. Lucia can recommend her sister's business but must disclose her family connection. She also should not be involved in the decision-making process or the review or approval of invoices.*



Keysha works as a realtor at nights and on weekends to supplement her income working in marketing for the Company. Is this a conflict?

## **ANSWER:**

*It could be, such as if Keysha were to perform tasks to market her listings during Company business hours and using Company resources. Keysha should disclose this potential conflict to her supervisor so they can set some ground rules on how to avoid a conflict of interest.*





# Safeguarding Company Assets & Resources and Keeping Business Information Confidential

We have developed substantial assets and resources over the course of our Company history, including:

- Physical plants and facilities, machines, equipment, computers, and other property
- Financial resources
- Intellectual property, including our inventions, ideas, and trade secrets
- Company and brand reputation
- Confidential business data and information

These assets and resources belong to the Company and it is our role to manage them responsibly. We must protect Company information, intellectual property, and other resources, using them only for the Company's benefit and protecting them from loss, inadvertent disclosure, or misuse.

Visit the Policy Center on SharePoint to view the Intellectual Property Policy and Confidentiality Policy.



**Q:** James is an engineer for a manufacturing company. He is working on developing an exciting new product that his company is hoping to patent. He needs to do some work on the project over the weekend, and decides to send the drawings to his personal email address so he can work on them on his home computer. Although he has a company-issued laptop, he doesn't have a docking station at home that will allow him to connect it to his large monitor there, so he prefers to work on his home computer.

*Is this okay?*

**A:** No. James should not send confidential company information to his personal email address, nor should he be working on this important project on his home computer, which may not have appropriate IT security in place. Since he needs the large monitor to work effectively from home, he should make arrangements with his IT department to obtain the proper docking station so he can connect his company-issued laptop there.





## We Protect Data & Personal Information

**We are transparent, fair and accountable.**

We earn and maintain our customers' and employees' trust by adhering to security, data protection, and privacy policies and practices aligned to global legal requirements and frameworks.

We comply with all applicable data protection and privacy laws, including by safeguarding personal information that is provided by:

- **Employees**
- **Job applicants**
- **Business partners**

We only disclose personal information when there is a legitimate purpose and when legally allowed or required to do so. Everyone has a responsibility to ensure the security of personal information.

Visit the Policy Center on SharePoint to view the IT Policy, Records Retention Policy, and Data Privacy Resources.

# HOW WE BUILD: Our Business Practices

## We Deliver Value to Our Customers with Our Products and Services

We deliver value to our customers through quality products and service solutions. We constantly strive to find customer-focused innovations, and we do not compromise on the quality or safety of our products or service solutions.

When our customers are governments or government agencies, we maintain appropriate controls and procedures specific to our government business activities and ensure compliance with applicable standards.



Government contracts require special attention. Be sure to utilize our Government Contract resources and ask for help if you have any questions about how to ensure compliance.

Visit the Policy Center on SharePoint to view the Government Contract Resources.



**ASK  
YOURSELF**

**Q:** Rosa learns of a potential problem with a product during routine production line testing. The extent to which the problem could affect product safety is unknown at this time, and Rosa isn't sure what to do.

*Should she speak up about this, even if she doesn't know all the details?*

**A:** Yes. Producing and selling potentially unsafe products could result in customer and employee injury and harm the Company's reputation. Rosa should report the problem immediately, by notifying her supervisor, quality assurance contact, or health and safety representative. If Rosa does not think her concerns are being adequately considered, she should consider raising them to the Legal or Compliance Team or via the Employee Helpline.



## Fair Competition Practices

We compete vigorously, legally, and fairly without compromising our ethical standards while complying with applicable antitrust and competition laws. Our competitive advantage is built through:

- ✓ Fair treatment of our customers, suppliers, and business partners
- ✓ Authentically presenting the value that our products and services bring to our customers
- ✓ Refusing to unfairly criticize or make false or misleading statements about our competitors or their products or services

## Trade Compliance

We comply with all applicable international trade laws, including:

- ✓ Domestic and foreign trade laws that apply to our businesses, products, services, operations, and employees
- ✓ Global trade controls and economic sanctions that prohibit us from doing business with certain countries, governments, entities, and individuals
- ✓ Laws that govern how products may be imported and exported internationally

Visit the Policy Center on SharePoint to view the Antitrust Resources, Trade Compliance Policy, and Trade Compliance Resources.





## Anti-Bribery & Corruption

We will not tolerate the offer or acceptance of bribes, kickbacks, or other corrupt payments. It is both illegal and unethical to offer, promise, give, or accept anything of value to improperly influence a business decision.

We are also committed to working with business partners who share the same dedication to legal and ethical behavior. We have procedures in place to assist with the retention of third-party agents and distributors, thus avoiding known risks.

Visit the Policy Center on SharePoint to view the Anti-Corruption Policy and Anti-Corruption Resources.



**ASK  
YOURSELF**

**Q:** Kevin is an environmental health and safety coordinator for a manufacturing plant that needs to renew its permit to use a chemical as part of the manufacturing process. After he submits the renewal paperwork, the clerk at the permit office hands him an empty envelope and says it will take three months to process the permit, unless the envelope is filled.

Kevin knows that the plant cannot run without the permit, and is worried that if it has to shut down for three months, it will close altogether.

*What should he do?*

**A:** The permit office clerk is requesting a bribe and the Company does not pay bribes, even if it a small amount of money. Nor would it be okay to have a local agent pay off the clerk instead, as the Company is responsible for actions that third parties take on its behalf. We cannot knowingly allow corrupt payments to be made on behalf of the Company. Kevin should contact the Legal or Compliance Team for additional assistance.



## Gifts & Entertainment Policy

Offering and accepting gifts and entertainment involving our customers, suppliers, and other business partners can only be done when doing so is legal, reasonable, appropriate, and has a legitimate business purpose.

If gifts or entertainment are intended or could be reasonably interpreted as a reward or encouragement for an improper favor or inappropriate preferential treatment, then they are never acceptable.

Gifts and entertainment must always be accurately and properly documented. For situations in which approvals are required by our Gift & Entertainment Policy, those approvals must be obtained.

Visit the Policy Center on SharePoint to view the Anti-Corruption Policy, Gifts & Entertainment Policy, and Gifts & Entertainment FAQs.

**Q:** A supplier offered Joe tickets to a professional sports game. The supplier would not be attending and told Joe that the tickets would go unused if he didn't take them. Joe plans to take a few members of his team to the game.

*Can he go?*

**A:** The tickets are considered a gift since the supplier is not attending. Gifts are generally discouraged, and the tickets should be politely refused. If Joe believes that there is a legitimate business purpose for accepting the tickets, then approval must be obtained in accordance with the Gift & Entertainment Policy.

**Q:** A supplier offered to take a few members of Kayla's team to a professional sports game.

*Can they go?*

**A:** Since the supplier is attending, this is considered entertainment. Entertainment is generally permitted so long as the entertainment is of modest value, infrequent and not lavish, extravagant or given for an improper purpose. If there is any question whether attending the game could be considered lavish or excessive, then approval should be obtained in accordance with the Gift & Entertainment Policy.



# Gifts & Entertainment Decision Tree

**IS IT  
APPROPRIATE?**



**IS IT OF  
REASONABLE VALUE?**



**DOES IT REQUIRE  
APPROVAL?**

## Appropriate if:

- ✓ Open and transparent, nothing expected in return, avoids perception concerns, has legitimate business purpose
- ✓ Not an excluded gift type such as cash, gift cards, or other cash equivalent
- ✓ Complies with laws, regulations, and policies for each party

## Of reasonable value if:

- ⚠ Not excessive for giver or receiver
- ⚠ Appropriate under the circumstances
- ⚠ If entertainment, not lavish or extravagant
- ⚠ If gift, value is less than \$100 USD

## Approval is required if:

- ⚖ Gift is for government entity or government official
- ⚖ Travel or lodging is going to be provided
- ⚖ Spouses or family members will be in attendance
- ⚖ Proposed gift is in excess of \$100
- ⚖ Proposed entertainment could be considered potentially lavish or excessive



## Accurate Recordkeeping Practices

We honestly and accurately record financial transactions and business information, following applicable laws, regulations, and accounting practices. We maintain internal controls to ensure that our books and records are clear, accurate, and complete.

Keeping accurate records is not just about creating documents—it is also about managing them. We must know and follow our internal controls and policies about records management, including maintaining, retaining, and correctly disposing of records. If you are asked for records or information as part of an audit, an investigation or litigation, you have a responsibility to be transparent and provide full and complete information. Doing so helps us complete this work quickly, and it demonstrates our culture of compliance and ethics.

## Fraud and Misrepresentation

Fraud involves deliberate, intentional deception or misrepresentation of information. Engaging in any type of fraudulent activity at our Company is never acceptable.

Most fraud can be avoided by carefully following the systems and controls that are in place and are designed to prevent individuals from having total control over money, supplies or records. If you learn of a potential fraud, do not try to cover it up. The fastest way to stop fraud is to report it promptly to your manager, general manager/site leader, HR professional, the Legal or Compliance Team or the Employee Helpline.



**Q:** Lana was hired as an accountant. The former employee in her role, Will, transferred to another department. During the transition process, Lana discovered that Will kept a large number of files.

*Does Lana need to save Will's files?*

**A:** In making this determination, both paper and electronic files should be reviewed. Since Will is still with the company, he should be involved in determining what needs to be retained. Lana can also consult with her manager for guidance.

Lana and Will should not dispose of any records without consulting the Company's Record Retention Schedule, which identifies the length of time records need to be saved. In addition, the type of file and the file's purpose, including whether it is needed for business operations or to show compliance with applicable laws, will come into play. Lana should also check with the legal department to see if any legal holds apply.

Visit the Policy Center on SharePoint to view the Record Retention Schedule and Control Resources.





## Honest & Accurate Communications

What we say and how we say it matters. Our internal and external communications must be reliable to preserve the trust we have in each other, our customers, suppliers, other business partners, and the communities in which we operate.

We make sure that any communications about our products, services, operations, and people are honest, authentic, and accurate.

## Responsible Use of Social Media

We communicate on social media responsibly, with integrity and respect, always ensuring our comments are appropriate for our businesses.

Be aware that your online activities can impact our workplace, even if you believe they are just your personal views. Social media postings must be consistent with the principles and expectations in this Code. Always be careful not to disclose confidential information of the Company or any of its owners, employees, customers, or business partners.



**Q:** Carlos is connected with everyone on his work team on social media. Recently, his manager has been posting sexist content that makes him uncomfortable.

*What should he do?*

**A:** His manager's social media posting probably violates our Code. Even though it happened outside of work, it is having an impact on Carlos and likely other team members since they are all connected on social media. Carlos should report this to HR or someone on the Legal or Compliance team so the Company can investigate the situation and address the behavior.



## Political and Charitable Contribution Policy

We generally do not directly or indirectly pay corporate funds to or furnish any assets for a political party, political candidate, or incumbent in any country or locality and would only do so with the approval of our Board of Directors.

Employees, officers, and directors may make personal political contributions where it is legally permissible to do so, but must not give the impression that the Company sponsors any candidate, referendum, or ballot initiative.

The organization will make charitable contributions carefully after appropriate vetting and with proper approvals and financial documentation. We will not reimburse any individual for political or charitable contributions.



## Environmental Stewardship

We are committed to operating our businesses in a way that demonstrates our compliance with environmental laws. We strive to measure, manage and reduce our environmental footprint. To do our part, we must all be familiar with applicable environmental laws, regulations and internal procedures.

## Respect for Human Rights

We are committed to compliance with human rights laws as they relate to our businesses, including those against slavery, human trafficking, and child labor. We strive to work with business partners who have practices consistent with this Code.

Visit the Policy Center on SharePoint to view the Environmental Policy, Human Rights Policy, and Conflict Minerals Policy.



# HOW WE BUILD: Speaking Up



## How to Use Your Voice

To build a culture of integrity and compliance, we encourage speaking up when something does not seem right. Ask questions. Express concerns. You are required to report any violations or suspected violations of our Code of Conduct, our Policies, or applicable laws.

It is our aim to conduct business with the highest standards of ethics, honesty and integrity. Each of us is responsible for preventing violations of this Code and

reporting concerns about any form of wrongdoing. If you suspect wrongdoing, do not remain silent - even if you do not have all the details related to your concern. Speak up and be rest assured that the Company will treat your concern seriously, fairly and promptly.



Honesty



Integrity



Ethics



**ASK  
QUESTIONS**

**EXPRESS  
CONCERNS**



**SPEAK UP**



# How to Report Violations

Reports to the Employee Helpline may be made anonymously in those countries that permit it. We strongly encourage those reporting concerns to identify themselves and provide as much information as possible to better enable us to thoroughly investigate all reports and reach the most appropriate resolution.

In any investigation of a suspected violation of this Code or our Policies, we will preserve confidentiality to the extent possible, and we will inform the person making the report when the matter has been closed. Employees must fully cooperate with any investigation and comply with any request by the Legal, Internal Audit, or Compliance Teams during an investigation.

For our leaders, when someone brings you a violation or suspected violation of our Code of Conduct, our Policies, or applicable laws, you are required to promptly involve a member of Heico's Executive Team, a Group or Corporate Human Resources Leader, an EH&S Leader, Legal Counsel, or the Compliance Team. Failure to escalate violations may result in disciplinary action.



## Reporting

You can always speak with your supervisor, your HR representative, or a member of your local management team. Alternatively, employees can contact anyone on Heico's Legal, Internal Audit, or Compliance Teams:

**The Legal Team Email:** [Legal@heicocompanies.com](mailto:Legal@heicocompanies.com)

**The Compliance Team Email:** [Compliance@heicocompanies.com](mailto:Compliance@heicocompanies.com)

**The Internal Audit Team Email:** [InternalAudit@heicocompanies.com](mailto:InternalAudit@heicocompanies.com)

*You can also access Heico's Employee Helpline to make a report:*

**Phone (US Toll-Free):** (800) 308-3904

**To make a report online or by phone for any country:**  
[heicocompanies.ethicspoint.com](http://heicocompanies.ethicspoint.com)



## We Do Not Tolerate Retaliation

Retaliation will not be tolerated against any employee who engages in the following conduct in good faith:

- Raising a concern or reporting actual or suspected violations of federal or state law or regulations or our Code of Conduct
- Cooperating with an investigation
- Refusing to take an action that violates federal or state law or regulations or our Code of Conduct

## False Reporting and Other Violations of this Code of Conduct

Making a false report in bad faith is inconsistent with the honest and ethical work environment the Company aims to provide. Any employee who intentionally or knowingly makes false or misleading allegations is in violation of this Code.

Violations of this Code will be taken seriously, and violators will be subject to discipline, up to and including termination.



## What do you think?



**Q:** What should I do if my manager tells me to do something that is dangerous or possibly illegal? I am afraid that if I speak up, my manager will retaliate against me.

**A:** In this situation, contact your HR representative, the Compliance Team, the Legal Team, or the Employee Helpline. The Company will not tolerate retaliation by a manager or others for a report made in good faith.

**Q:** What if I reported a potential violation or concern, but never heard anything back about it? Does that mean it was not addressed?

**A:** No. All matters are addressed promptly, but it may not be possible for the results or any corrective action taken to be communicated back to you due to privacy or confidentiality requirements. If the concern was reported through the Employee Helpline, use the case key you were assigned to check the status. If it was reported directly, you can inquire as to whether the issue has been addressed and resolved. Do not assume that no action has been taken simply because you have not been informed of the results.



**Q:** I have been asked to cooperate in an internal investigation. Must I participate?

**A:** Yes. As a part of your employment, you are obligated to truthfully cooperate in internal investigations. Failure to do so may result in disciplinary action, up to and including termination of employment.





# We are Committed to Doing the Right Thing

We are all responsible for making ethical decisions. But sometimes doing the right thing is not clear. Our Code of Conduct does not explicitly cover all conceivable situations or circumstances we could face, and when it is not clear, we can ask ourselves these questions:

*Would I be Embarrassed if My Action or Decision Appeared in the News or Media?*

**NO.** Proceed.

**YES.** The action may have serious consequences. Do not do it.

*Is It Safe?*

**NO.** The action may have serious consequences. Do not do it.

**YES.** Proceed.

*Is it Consistent with Our Values and Culture?*

**NO.** The action may have serious consequences. Do not do it.

**YES.** Proceed.

*Is It Legal?*

**NO.** The action may have serious consequences. Do not do it.

**YES.** Proceed.

*Does it Comply with Our Code and Other Policies?*

**NO.** The action may have serious consequences. Do not do it.

**YES.** Proceed.

*Would it Negatively Impact Our Reputation?*

**NO.** Proceed.

**YES.** The action may have serious consequences. Do not do it.



THE  
**HEICO**  
COMPANIES

**Code of Conduct**

Issued: January 2024

Report a Violation

[heicocompanies.ethicspoint.com](https://heicocompanies.ethicspoint.com) | (800) 308-3904