



TEXTRON

Business Conduct Guidelines

A MESSAGE FROM OUR CHAIRMAN AND CHIEF EXECUTIVE OFFICER, SCOTT C. DONNELLY

Textron's Commitment to Integrity

Colleagues,

I would like to take this opportunity to emphasize that compliance remains a very important issue for all of us at Textron. I believe that we hire good people whose integrity and ethics are above question. Clearly, we expect our employees to demonstrate these values in all of their professional interactions.

However, it's also important to recognize that we live in complex times.

All of us have read about companies whose behaviors have jeopardized their organizations, their employees and even whole communities. When we fail to live up to standards that we have set for ourselves we are at serious risk of damaging our businesses, our brands and our credibility.

What it comes down to is this: Doing the right thing matters. Behaving ethically matters in our relationships with our co-workers. It matters in our dealings with suppliers. It certainly matters to our customers. It matters to our future.

That's why I ask each of you to review and personally commit to our *Business Conduct Guidelines*. In an increasingly regulated and changing business environment, it may be difficult to always know the right thing to do. The *Business Conduct Guidelines* are a valuable resource that serves as a road map for every one of our employees around the world. If you are ever in doubt about whether some action will violate Textron standards or the laws of the countries where we do business, consult our *HelpLine* or talk to one of our attorneys or compliance officers.

I am proud to be part of a company with a strong Ethics & Compliance Program – one that has served its employees well for more than 30 years. As you go about your day to day work, I trust that you will continue to value responsible, ethical conduct and our core values of integrity, respect, trust, and pursuit of excellence as much as I do.

Sincerely,

Scott



TABLE OF CONTENTS

INTRODUCTION

Message from the CEO	1
Our Values & Principles	3
Standards of Conduct	4

OUR PRINCIPLES

HONESTY	5
Transactions with Customers	6
Suppliers & Other Business Partners	7

WORKPLACE RESPECT	8
EEO, Diversity & Inclusion	9
No Harassment or Discrimination	10

COMPLIANCE WITH LAW	11
Antitrust & Fair Competition	12
International Trade	13
Political Involvement	14
Anti-Corruption	15
Maintaining Accurate Books & Records	16
Insider Trading	17
Public Communications	18

NO CONFLICTS OF INTEREST	19
Conflicts of Interest	20
Gifts & Entertainment	21

PROTECTING OUR ASSETS	22
Properly Using Company Assets	23
Safeguarding Proprietary Information	24
Personal Data Protection	25
Information Governance	26

SAFETY & ENVIRONMENT	27
Safety & Environment	28
Drug & Alcohol-Free Workplace	29
Human Rights	30

REPORTING

Reporting Violations	32
Reporting Resources & <i>Helpline</i>	33



OUR VALUES & PRINCIPLES

LIVING OUR VALUES EVERY DAY

At Textron, we are guided in all of our business interactions by our four Values: *Integrity, Respect, Trust, and Pursuit of Excellence*. These Values are core to Textron's culture and define who we are as an organization. They are intended to help us make the best possible decisions, manage change, and provide a foundation for Textron's future.

As you consider Textron's Values, reflect on how you will embrace the Values as a Textron employee.



INTEGRITY

Integrity is the quality of being honest and having strong moral principles. We exhibit integrity by valuing honesty and openness, dealing fairly with our customers, suppliers, competitors, and fellow employees, and taking responsibility for our actions.



RESPECT

Respect is regard for others. We show respect by empowering people to be themselves, demonstrating concern and support for individual differences, and listening when others express their unique ideas, experiences, and perspectives, even if we disagree.



TRUST

Trust is a belief in the reliability, ability, strength, character, or truth of something or someone. We demonstrate trust and show that we are trustworthy by being honest and reliable, honoring our commitments, admitting when we have made mistakes, and communicating effectively so that others don't misunderstand our intent.



PURSUIT OF EXCELLENCE

The Pursuit of Excellence is the drive to do our best. We demonstrate this pursuit by setting high standards, paying attention to the details, measuring what we have accomplished, and striving for improvement.

OUR PRINCIPLES

We live our Values every day by abiding by the following six Principles around which our Business Conduct Guidelines are built:

Honesty

**Workplace
Respect**

**Compliance
with Law**

**No Conflicts
of Interest**

**Protecting
Our Assets**

**Dedication to Safety
& Environment**

You will find more on each of these Principles as you explore the BCGs.

STANDARDS OF CONDUCT

We are expected to carry out the Company's business with fairness, honesty, integrity, and high ethical standards, and in compliance with the laws and regulations of the countries where we do business. These standards must apply to every decision that affects Textron.

Textron requires that its Board of Directors and its officers and employees worldwide comply with the Textron Business Conduct Guidelines (BCGs). Only the Board of Directors or a Committee of the Board of Directors may grant a waiver to our Business Conduct Guidelines for executive officers or directors. Any such waiver must be promptly disclosed publicly, as required by law or regulation.

Those found to have violated the BCGs or to have engaged in misconduct may be subject to discipline, including possible termination of employment.

MAKING ETHICAL DECISIONS

No single document can identify every possible scenario you may encounter. Rather, our BCGs point you to *Textron's True North* on many issues... and point you to available resources if you have questions or concerns. If you are navigating a difficult ethical dilemma or compliance challenge, stay on the right course by asking yourself a few key questions:



Following this path should lead you to the right result. If you are still not sure what the right course of action is after answering these questions, then seek additional advice and guidance from one of the many Company resources available or contact the *HelpLine* using the link below.

SUPERVISORS TAKE NOTE

As leaders in the Textron organization, supervisors and managers have additional responsibilities when it comes to supporting our BCGs:

Lead by example.

Always act in a way that is consistent with Textron's Values and these BCGs; be clear with your team that Textron expects its employees to do the same even if that could mean losing business or reducing profitability – because our reputation and our Values outweigh financial considerations.

Maintain an open-door policy.

Cultivate an inclusive environment where employees feel safe and comfortable – whether expressing an alternative viewpoint, asking questions, or reporting concerns.

Escalate and report allegations of misconduct.

You are accountable for dealing with concerns employees may bring to your attention. Understand your obligation to report behavior that is illegal or violates the BCGs, our policies, or the law. But do not undertake an investigation on your own. Seek help by escalating and reporting allegations of misconduct when they arise.

Prevent retaliation.

Ensure that employees who raise concerns in good faith are protected from retaliation.

HONESTY

Honesty is the first of our six Principles. It is a non-negotiable requirement of your behavior while working on behalf of Textron.

TRANSACTIONS WITH CUSTOMERS

TEXTRON'S TRUE NORTH

We are committed to maintaining the highest levels of honesty and integrity when working with our customers.

We work to build strong business relationships with our customers based on lawful, honest business practices and the best interests of Textron.

We are committed to the pursuit of excellence in all of our products and services and strive to meet or exceed our customers' expectations for quality, integrity, safety, delivery, and reliability.

POINTING THE WAY

No matter the customer, there are several core requirements to keep in mind:

- Promise what you can deliver and deliver on what you promise
- Respond promptly to customer requests and questions
- Never follow a customer's request to do something that you regard as unethical or unlawful
- Talk to your supervisor if you have concerns about any error, omission, undue delay, or defect in quality or customer service

TIP

Remember: You can report pressure to cut corners on quality or delivery standards, or other requirements by making a confidential report to the *HelpLine*.

Resources

[Textron Transactions with the United States Government Policy](#)

[Textron U.S. Government Contractor Business Ethics, Internal Control and Mandatory Disclosure Compliance Policy](#)

[Textron Global Anti-Corruption Compliance Policy and Supplement](#)

[Additional Information](#)

HELPING YOU STAY ON THE RIGHT COURSE

Individuals with responsibilities relating to government contracts must be aware of applicable requirements including those governing:

- ✦ Procurement integrity and receipt and use of competitive information
- ✦ Preparing proposals and negotiating contracts
- ✦ Conflicts of interest
- ✦ Dealings with prime contractors and subcontractors
- ✦ Recording, allocating, and charging costs
- ✦ Prohibition of kickbacks
- ✦ Design, manufacture, and testing of products
- ✦ Entertainment, gifts, and gratuities
- ✦ Mandatory disclosure

Failure to comply with government contracting requirements can expose Textron to price reductions, delayed payments, termination of contracts, suspension, debarment, and civil and criminal penalties. Individual wrongdoers may be subject to fines and imprisonment.

SUPPLIERS & OTHER BUSINESS PARTNERS

TEXTRON'S TRUE NORTH




We carefully choose and monitor our suppliers and other business partners.

We expect our suppliers and other business partners to conduct business in accordance with the highest ethical standards – and not in a way that could damage Textron's reputation or cause the Company to be in violation of any law or regulation. Textron has adopted the *Textron Code of Conduct for Suppliers and Other Business Partners* and expects each of our suppliers and other business partners to comply with applicable laws and to follow that Code.

Suppliers and other business partners can be viewed as an extension of our Company. Their actions can damage our reputation and even result in Textron being found liable for their misconduct.

POINTING THE WAY

Our purchasing decisions must always be based on appropriate business criteria such as price, quality, technical leadership, reliability, and the reputation of the supplier.



-  Never follow a third party's request to do something that you regard as unethical or unlawful
-  Respond promptly to supplier and business partner requests and questions
-  Avoid doing anything that might compromise your objectivity

ROADMAP

Business partners include dealers, distributors, agents, consultants, freight forwarders, customs brokers, representatives, lobbyists, attorneys, accountants, and suppliers.

HELPING YOU STAY ON THE RIGHT COURSE

Each of us is responsible for the proper selection and monitoring of our suppliers and other business partners:

-  Make sure you understand who you are doing business with by following Textron and Business Unit due diligence processes.
-  Report any concerns about a supplier's or other business partner's conduct to your supervisor, or your Business Unit's Legal department.

TIP

Certain business partners require pre-approval by Textron prior to appointment under the *Textron Global Anti-Corruption Compliance Policy*, or the *Textron Policy on Engagement of Consultants*. Make sure you understand and follow pre-approval requirements before engaging a Business Partner.

Resources

[Textron Code of Conduct for Suppliers and Other Business Partners](#)

[Textron Global Anti-Corruption Compliance Policy and Supplement](#)

[Textron Policy on Engagement of Consultants](#)

[Additional Information](#)

WORKPLACE RESPECT

It comes down to the Golden Rule:
Treat others the way you want to be treated.

EQUAL OPPORTUNITY, DIVERSITY & INCLUSION

TEXTRON'S TRUE NORTH

We are committed to provide equal employment opportunities to all employees, and to maintain a work environment in which all employees are respected, individual differences are celebrated, and the full contribution of every employee is encouraged in order to create a stronger Company.

At Textron, we recruit, hire, train, promote, and compensate people based on merit, job-related qualifications, and abilities.

We value the differences among our employees and strive to ensure our global employees are empowered to contribute their unique ideas, experiences, and perspectives to deliver value to our customers, enrich the workplace, and reinforce our reputation as leaders in our industries.

POINTING THE WAY

We do not tolerate discrimination of any kind. We expect all our employees to foster a workplace that is respectful of one another, where we are all treated with dignity, and where our differences are embraced.

ROADMAP

Though this may vary by country, individuals are generally protected under law from discrimination based on these characteristics:

- ✦ Race
- ✦ Color
- ✦ Religion
- ✦ National and ethnic origin
- ✦ Sex (including pregnancy)
- ✦ Sexual orientation
- ✦ Gender identity and expression
- ✦ Age
- ✦ Marital status
- ✦ Disability (physical or mental)
- ✦ Genetic information
- ✦ Status as a veteran, military service or obligation
- ✦ Any other characteristic protected by country, federal, state, or local law

Resources

[Textron Equal Employment Opportunity Policy](#)

[Additional Information](#)

NO HARASSMENT OR DISCRIMINATION

TEXTRON'S TRUE NORTH

We are committed to providing a professional work environment that is free from unlawful discrimination and harassment, including sexual harassment.

At Textron, all employees are treated with respect. Discrimination and harassment of employees by managers, supervisors, or co-workers is not tolerated. Textron also does not tolerate discrimination or harassment by our employees directed towards non-employees with whom Textron has a business or professional relationship (such as independent contractors, vendors, and customers). In addition, Textron makes every effort to protect employees from inappropriate behavior by non-employees in the workplace.

POINTING THE WAY

We expect all Textron employees to promote a culture of respect, and a safe and inclusive workplace.

Employees must avoid engaging in any behavior that is offensive or unwelcome to fellow employees, customers, vendors, independent contractors, or other visitors.

These rules apply not only to the immediate workplace, but also to any work-related settings, like business trips, business meetings and business-related social events, and on social media messaging.

ROADMAP

Textron defines **Harassment** to include verbal, physical, written, or visual conduct that creates an intimidating, offensive, or hostile working environment, or that interferes with an employee's work performance. Prohibited harassment can take many forms and may include (by way or example only) demeaning or offensive slurs; unwelcome jokes, gestures, and pictures; offensive emails or texts; or assault or other inappropriate physical actions.

Sexual Harassment can include unwelcome sexual advances or touching of a sexual nature; requests or demands for sexual favors; displaying or sending written, graphic, electronic, or verbal communications that contain sexual, vulgar, derogatory, or obscene content; unsolicited attention of a sexual nature; sexual innuendo; or other unwelcome verbal, physical, or written conduct of a sexual nature.



TIP

If you feel that you have been harassed or discriminated against, or if you observe such behavior, you should immediately report it to your supervisor, HR Business Partner, a Business Unit Ethics & Compliance liaison or advisor, an attorney in your Legal department, or the Textron *HelpLine*. Every report of discrimination or harassment is taken seriously and investigated fully. We will not tolerate any retaliation taken against anyone who raises a concern in good faith or who cooperates in any investigation.

Resources

[Textron No Harassment Policy](#)

[Additional Information](#)

COMPLIANCE WITH LAW

Lack of knowledge is no excuse for non-compliance with the law. Even seemingly small missteps can have big consequences. Pay careful attention to the legal requirements and limitations that relate to your activities on behalf of Textron and reach out to our subject matter experts for guidance if you are not absolutely confident your actions are compliant with the law.

ANTITRUST & FAIR COMPETITION

TEXTRON'S TRUE NORTH

We are committed to competing honestly and fairly in the global marketplace, based solely on the merits of our products and services.

We comply with all applicable antitrust laws (also known as competition laws). Antitrust laws are designed to ensure full and fair competition in the sale of products and services and in the sourcing of supplies, vendors, and employees. These laws prohibit competitors from creating agreements that prevent or restrict free competition.

Many of the countries where Textron does business have enacted antitrust laws. Violation of these laws may result in serious penalties being imposed on the entities involved. Individuals who violate these laws may be subject to criminal prosecution.

POINTING THE WAY

Compliance with the antitrust laws requires that Textron employees:

- Avoid communicating with competitors concerning prices, costs, terms of sale, business plans, suppliers, customers, prospects, and territories
- Never seek an agreement with a third-party to fix or set the price Textron will charge for its products or services
- Reject agreements that divide or allocate access to customers, markets, or territories
- Refuse to participate in any group boycott of certain customers or suppliers
- Only gather competitive information about our competitors' products and services using publicly available sources

ROADMAP

Business practices that always raise serious antitrust concerns include.

Price fixing. An arrangement with one or more competitors to artificially establish (fix) the price of a product, material, or service, or to limit output

Bid rigging. An arrangement by which competitors coordinate their activities for the purpose of determining in advance which firm will win the contract

Market allocation. An agreement between competitors to allocate territories or customers so that each competitor is protected from competition

HELPING YOU STAY ON THE RIGHT COURSE

Antitrust laws can be complicated! Other activities that may raise antitrust concerns include:

- ✦ Restrictions on the resale of products, including resale price restrictions
- ✦ Bundling or tying the purchase of one product to the purchase of another product
- ✦ Refusals to supply or do business with certain customers or suppliers for purposes of restricting competition
- ✦ Predatory pricing where the sale price is below Textron's cost
- ✦ Discriminatory pricing that results in similarly situated customers receiving a different price for the same goods without a legal justification
- ✦ Requirements contracts and exclusive dealing contracts
- ✦ Certain no hire agreements or other restrictions on future employment opportunities

If you are ever in doubt about whether a specific course of conduct may violate the antitrust laws, consult with your Legal department.

TIP

Participating in trade association activities can pose a special risk since they often involve joint meetings between competitors. Make sure you know how to identify sensitive topics before attending.

Agreements with a competitor do not need to be in writing to violate antitrust and competition laws. A knowing "wink" or a "nod" could give rise to an antitrust violation.

Resources

- [Textron Antitrust Policy](#)
- [Additional Information](#)

INTERNATIONAL TRADE

TEXTRON'S TRUE NORTH

We respect and follow the international trade laws applicable to our global business.

International trade laws include export controls, import controls, sanctions, anti-boycott rules and anti-money laundering laws.

Companies and individuals that violate these laws could be subject to severe civil and criminal penalties that could severely impact our business, including fines, penalties, loss of export privileges, and damage to our corporate reputation and government relationships.

POINTING THE WAY

To satisfy these international trade laws, each of us is expected to:

- Understand and adhere to the export regulations that apply to the work we do, including making sure that any transfers of export-controlled articles or technology occur only pursuant to valid U.S. or other applicable government authorizations
- Ensure that any imported products or commodities are given the correct classification, valuation, and country of origin and that all import documentation is accurate and complies with applicable laws and regulations
- Conduct reasonable due diligence reviews on the parties with whom we are doing business
 - Perform denied party screenings to be sure we do not do business with restricted or sanctioned countries, individuals, or entities
 - Watch for money laundering red flags
- Be alert for illegal boycott requests by potential business partners and refuse to take any action that could be perceived as participation in an unsanctioned boycott

TIP

If you are ever unsure about your global trade compliance obligations, or if any red flags arise, consult your Global Trade Compliance or Legal department for guidance.

Resources

[Textron Export Compliance Policy](#)

[Textron Import Compliance Policy](#)

[Textron Anti-Money Laundering Policy](#)

[Additional Information](#)

ROADMAP

Exports occur whenever we send or transmit an item out of the country in which it is located. Exports include not only the physical shipment of tangible items but also the transfer of intangible items like technology, software and services by electronic means or in-person communication. The release of export-controlled technology to a foreign person is deemed to be an export regardless of where that release occurs.

Export Controls restrict the export of certain goods and technology. Exports may be restricted because of the nature of the exported item. Defense articles and sensitive dual-use items often require government authorization for export. Exports also may be restricted because of an improper end-use (e.g., supporting hostile military forces or furthering missile proliferation), or because the recipient or destination country is subject to sanctions or other restrictions.

Imports occur when we bring goods from one country into another, whether entered permanently for consumption or temporarily for use.

Import controls are country-based rules for regulating the importation of foreign goods. They require making accurate declarations about the goods at the time of entry, obtaining any required permits, and paying the proper amount of customs duties and taxes.

Sanctions are laws, regulations, and executive orders that restrict the ability to do business with certain named countries, entities, and individuals and are imposed by governments to accomplish foreign policy and national security objectives.

Anti-Boycott rules restrict U.S. persons from complying with other countries' restrictive trade practices which the U.S. does not support. For example, a U.S. company may not agree to a foreign country's request that it refuse to do business with a third country which is not itself under U.S. sanctions.

Money Laundering. Criminals sometimes try to conceal the origins of their illegally obtained money by using the proceeds of criminal activities to make purchases from companies like Textron. Many countries have laws against money laundering which prohibit the acceptance or processing of those proceeds.

POLITICAL INVOLVEMENT




TEXTRON'S TRUE NORTH

We comply with the laws that regulate corporate participation in the political process, including those that restrict lobbying and political contributions.

In the U.S., laws substantially limit corporate contributions to candidates and to political parties. Other laws impose requirements on persons regularly involved in lobbying government agencies. Many governments, including the U.S., prohibit political contributions made by foreign interests.

POINTING THE WAY

To ensure we are complying with applicable laws, Textron prohibits each of the following activities unless they have been pre-approved by the Textron Government Affairs Department:

-  All Textron corporate contributions to political parties or candidates anywhere in the world
-  All U.S. Federal Government lobbying activities, as well as meetings or activities with U.S. elected officials
-  Use of the Company name, funds, assets, services, or facilities to support any political candidate or party or to engage in any lobbying activity

TIP

Textron encourages all employees to individually participate in the political process by supporting the political parties and candidates of their choice, but never apply direct or indirect pressure on another employee, customer, or business partner to contribute to, support, or oppose any political candidate or party.

Resources

[Textron Engagement of Consultants Policy](#)

[Contacting Textron's Government Affairs Department](#)

[Additional Information](#)

ANTI-CORRUPTION



TEXTRON'S TRUE NORTH

We do not offer, give, solicit or accept bribes or kickbacks, and we do not allow others to offer, give, solicit or accept bribes or kickbacks on our behalf.

The United States and many other countries around the world where Textron does business have anti-corruption laws. These laws prohibit the offering, giving, soliciting, or accepting of any bribe or kickback in dealings with Government Officials and, in some countries, with representatives of commercial organizations. Textron prohibits these activities in dealings both with Government Officials and with representatives of commercial organizations.

POINTING THE WAY

Penalties for violation of anti-corruption laws are severe and may result in large fines being imposed on the entities involved and criminal prosecution of individuals

-  Immediately report any request for a bribe and any offer or request for a kickback to your manager, your Business Unit's Legal department, or to the Textron *HelpLine*
-  Always make sure expense reports and accounting entries are complete, accurate, and correctly describe the transaction. Accurate record-keeping and expense reporting is an important part of preventing improper payments

ROADMAP

Some helpful definitions:

Bribe. Giving anything of value – such as cash, gifts, travel, offers of employment, charitable donations, or contributions – for the purpose of improperly obtaining or retaining business

Kickback. Illegal payment intended as compensation for preferential treatment in connection with making or fostering business arrangements

Government Official. Any officer or employee of a government entity, state-owned business, or international organization (like NATO and the United Nations); any foreign political party; and any candidate for public office

Facilitation Payments. Unofficial fees paid to low-level government employees to speed or initiate the performance of routine and expected government services to which the party making the payment is entitled. Also known as “grease payments,” they are illegal in many countries

HELPING YOU STAY ON THE RIGHT COURSE

Third party intermediaries pose a risk because Textron may be held responsible for any improper payments they make. We must never allow an intermediary to do something for us that we cannot ethically or legally do ourselves. Prior to engaging an intermediary to act on behalf of Textron, follow all preapproval requirements set forth in the Global Anti-Corruption Compliance Policy and Supplement.

TIP

Textron prohibits Facilitation Payments except in extreme circumstances where there is an immediate threat to life, health, or safety. If such a circumstance arises and a payment is made, you must report it immediately to your Business Unit's Legal department.

Resources

[Textron Global Anti-Corruption Compliance Policy and Supplement](#)

[Textron Transactions with the United States Government Policy](#)

[Additional Information](#)

MAINTAINING ACCURATE BOOKS & RECORDS





TEXTRON'S TRUE NORTH

We maintain accurate and complete business records in compliance with all applicable laws.

All business records must accurately reflect the transactions of the Company. This includes everything from the most complex financial records to each employee's individual timecard. Textron will not create or permit false or misleading entries to be made in the Company's books and records under any circumstances. The failure to maintain accurate books and records can result in violations of law including applicable securities laws and the U.S. Foreign Corrupt Practices Act.

POINTING THE WAY

Government agencies, customers, suppliers, and investors rely on the integrity of our business records. Accurate and complete records are essential to making good business decisions and to the timely recording and reporting of our financial results.

-  Be familiar with the business records and record-keeping procedures that apply to your role
-  Properly document travel, entertainment, and other expenses
-  Ensure all time and costs are charged to the correct charge number or contract
-  Never falsify, omit, misstate, alter, or conceal any information, or otherwise misrepresent the facts on a Company record or encourage or allow anyone else to do so

TIP

If you have any reason to believe that a record is inaccurate or misleading, contact your supervisor, your Business Unit's Legal department, or the *Textron HelpLine*.

Resources

[Additional Information](#)

INSIDER TRADING

TEXTRON'S TRUE NORTH

We do not trade in securities while we are in possession of material, non-public information, and we do not provide “tips” to others who may trade in those securities.

Insider trading is a crime, and violations of the securities laws that prohibit insider trading are treated very seriously. Both the Company and the individual who trades on inside information may be subject to severe civil and criminal penalties.

POINTING THE WAY

As part of your work with Textron you may have access to material, non-public information about Textron or other companies doing business with Textron. You may have access to this information through your job duties or through other ways such as attending formal or informal meetings, overhearing a conversation, or seeing a document on a copy machine. Using this information or conveying this information to others who are not authorized to receive it is a violation of our policies and may also violate securities laws.

When in possession of material, non-public information about Textron or another company:

- Do not purchase or sell Textron securities, or the securities of the other company, either directly or through family members or other persons or entities
- Do not share such information with unauthorized persons, whether family members, friends or others
- Do not provide “tips” or recommendations to trade in Textron or the other company’s securities, even if you do not share the underlying information

TIP

Even if you don’t own Textron stock, you might still be in violation of insider trading rules if you provide “tips” to others or trade in the stock of other companies based on information you learn at work.

Contact your Legal department if you have any questions or concerns regarding the insider trading rules before completing any proposed purchase or sale of securities of Textron or any company with which Textron does business.

Resources

[Additional Information](#)

ROADMAP

Information is considered **material** if a reasonable investor would likely consider it important in making a decision to purchase, hold, or sell a security. Information is considered non-public until it is widely disseminated (in other words, distributed through commonly recognized channels with adequate time for the public to receive and digest the information, usually 24 hours after release). Examples of possible material, non-public information include:

- ✦ Financial information, such as corporate earnings and forecasts
- ✦ Significant new product announcements
- ✦ Merger or acquisition activities
- ✦ Significant new contract awards or cancellations
- ✦ Changes in executive management
- ✦ The status of major litigation
- ✦ Significant cybersecurity incidents

Trading includes all transactions in securities, including any purchase or sale of common stock, the exercise of employee stock options and fund transfers or fund reallocations into or out of the Textron Stock Fund in your Textron Savings Plan account. It also includes trades executed pursuant to limit orders, even if these were placed prior to your coming into possession of material, non-public information.

PUBLIC COMMUNICATIONS




TEXTRON'S TRUE NORTH

We are committed to accurate, honest, and timely public communications.

As a publicly traded company, Textron is subject to regulations that govern the disclosure of information to the public.

POINTING THE WAY

Textron has an obligation to make clear and accurate public disclosures. Therefore, be aware of the following requirements that apply to all public communications:

-  **Public Disclosures and Financial Reporting.** Textron is committed to providing full, fair, accurate and timely disclosures in all public filings and communications including reports and documents filed with the U.S. Securities and Exchange Commission. Employees with finance and accounting responsibilities have a special duty to comply with the legal and regulatory requirements that govern these reports and must know and follow the internal controls and procedures established by Textron to ensure the accuracy of these reports. Inaccurate, incomplete, or untimely reporting may result in liability for the Company and for those involved. Financial fraud is a serious violation of law and may result in civil and criminal liability. Employees must report any suspected accounting or auditing irregularities immediately.
-  **Contact with the Media.** Only specified persons authorized to communicate, publish content, or speak publicly on behalf of the Company may do so. Unless you have been approved as a Textron spokesperson, you may not engage with the media on behalf of Textron. This includes responding to media inquiries and interview requests
-  **Speaking Engagements and Publishing.** Prior to accepting public speaking engagements or publishing articles related to your work with Textron, consult with your Business Unit's Legal department
-  **Social Media.** While Textron respects every individual's rights to use social networking sites to express their personal views, social media postings can adversely impact our Company. Even a short tweet, post, or comment revealing confidential information may expose Textron to legal liability or result in loss of valuable proprietary information. Each of us is responsible for exercising care and good judgment on social media sites, personal websites, or blogs
 - Never disclose Textron, customer, or third party confidential or proprietary information on social media
 - Never post material that is obscene, threatening, discriminatory, abusive, or otherwise not aligned with our values
 - Ensure that the opinions expressed are stated as your own and not those of Textron unless you have been designated as a Textron spokesperson

TIP

Refer all requests from members of the media or financial analysts to your Business Unit's Communications department.

Resources

[Textron Disclosure Policy](#)

[Textron Guidelines for Use of Social Media](#)

[Textron Policy on Use of Information Technology](#)

[Additional Information](#)

NO CONFLICTS OF INTEREST

The first rule in avoiding potential conflicts of interest is transparency.



CONFLICTS OF INTEREST

TEXTRON'S TRUE NORTH

We disclose and resolve all actual, apparent, and potential conflicts of interest.

Each of us owes Textron a duty to advance the Company's legitimate interests when the opportunity arises. A conflict of interest occurs when competing interests interfere with our ability to make objective decisions on behalf of Textron.

We are expected to use good judgment and avoid situations that can lead to *even the appearance* of a conflict of interest as it could undermine the trust that our customers, business partners, fellow employees, and the public place in us.

POINTING THE WAY

Employees and Supervisors are expected to work together to address conflicts of interest.

Employees:

- Promptly disclose all actual and potential conflicts of interest to your supervisor

Supervisors:

- Consider the risks posed by the actual or potential conflicts of interest raised by your employees
- Consult with your Business Unit's Legal department for guidance
- Document the disclosed conflicts and the steps taken to resolve or mitigate them

HELPING YOU STAY ON THE RIGHT COURSE

Some common examples of conflicts of interest include:

- ✦ Outside employment or consulting that interferes with your ability to perform your day-to-day job responsibilities
- ✦ Being employed by or having a business connection with a customer, supplier, contractor, or competitor
- ✦ Using your position to direct Textron business to a family member, close friend, or to another business from which you could receive some benefit
- ✦ Using Textron property, assets, or company confidential information for a personal benefit or to benefit others
- ✦ Supervising a family member, close friend, or an individual with whom you have, or had, an intimate relationship
- ✦ Taking for yourself any Corporate opportunity that is discovered using Textron property, information, or position

TIP

If you work with government agencies, know the rules around organizational conflicts of interest and restrictions on post-government employment.

Resources

[Additional Information](#)

GIFTS & ENTERTAINMENT

TEXTRON'S TRUE NORTH

We exercise good judgment before offering or accepting meals, gifts, travel, or entertainment.

Meals, gifts, travel, and entertainment are sometimes called *business courtesies*. Any exchange of business courtesies must comply with applicable laws and policies. Business courtesies must never be exchanged to improperly influence a business decision or to gain an unfair competitive advantage.

POINTING THE WAY

To determine if you may give or receive a business courtesy, you must first understand whether any law or policy would limit or prohibit the giving or receipt. Keep in mind that your Business Unit policies may be stricter than the BCGs, and you must follow the stricter policy. Additionally, the laws and policies governing the recipient must be taken into account. Your Business Unit Legal department can help you navigate these limitations.

Unless your Business Unit policies or the laws or policies that govern the recipient are more restrictive, you may exchange business courtesies with third parties who are not domestic or foreign officials (Officials) if they meet all of the following requirements.

The exchange:

- Is for a legitimate business purpose
- Was not solicited
- Would not impose an obligation on the recipient
- Would not create an appearance of impropriety based on timing or frequency
- Is open and transparent, and
- Is not intended to corruptly influence the recipient

The business courtesy:

- Is not lavish or inappropriate
- Is not cash or a cash equivalent, and
- If a gift, has a value of US \$75 or less, unless the exchange has been approved in advance by your supervisor in consultation with your Legal department

HELPING YOU STAY ON THE RIGHT COURSE

- ✦ Special considerations apply when providing ANY business courtesies to Officials. Because of the complexity of these laws and regulations, do not give any business courtesy (including travel) to any Official – domestic or foreign – without first consulting your Business Unit's Legal department and obtaining all required approvals.
- ✦ Charitable contributions, donations, and sponsorships can have similar characteristics to business courtesies. Consult with your Legal department before making a charitable contribution or donation or entering into a sponsorship.

TIP

A business courtesy offered to a close family member of a person will be treated as having been given to the person. Close family members include a person's spouse, domestic partner, children, parents, and siblings.

Resources

[Textron Global Anti-Corruption Compliance Policy and Supplement](#)

[Textron Transactions with the United States Government Policy](#)

[Additional Information](#)

PROTECTING OUR ASSETS

This Principle is all about how we use, maintain, preserve, and protect the things Textron entrusts us with every day.



PROPERLY USING COMPANY ASSETS

TEXTRON'S TRUE NORTH

We properly use, protect, and safeguard Company property, as well as the property of our customers, suppliers, and business partners that is in our possession.

This responsibility includes using assets appropriately and protecting them from loss, damage, theft, waste, or other improper use and covers both tangible and intangible property.

POINTING THE WAY

We are all individually responsible for protecting Textron's assets. This responsibility applies to physical assets of all kinds, including Textron's facilities and the assets of employees and third parties who work at or visit Textron's facilities. It applies to documents, materials, equipment, tools, supplies, inventory, and communications equipment such as computers and cell phones. And it also applies to intellectual property and all other types of intangible assets.

HELPING YOU STAY ON THE RIGHT COURSE

Electronic assets require special attention.

- ✦ Always keep computer equipment safe and secure and protect your user IDs and passwords. Do not share your passwords with anyone
- ✦ Remember that our computer equipment, phones, email, and internet access are for business purposes, though some limited personal use is acceptable
- ✦ Use e-mail and the internet responsibly and never in an illegal or unethical manner
- ✦ Immediately report the loss or improper use of, or access to, Company information systems to your Business Unit's IT department
- ✦ Safeguard your employee or other user ID and don't admit unauthorized persons into a Textron facility

ROADMAP

Tangible assets are physical assets of all kinds including Textron's facilities, tools, documents, materials, equipment, supplies, inventory, and communications equipment such as computers and telephones.

Intangible assets are non-physical assets including software and other types of digital assets, information, patents, copyrights, know how, trademarks, and other intellectual property.

TIP

Where allowed by local law, Textron may monitor employee use of any Company computer system or network and may also monitor business applications installed on personal devices in accordance with the terms and conditions of our Bring Your Own Device program. Privacy may be limited when using these IT systems and business applications.

Resources

[Textron Policy on Use of Information Technology](#)

[Additional Information](#)

SAFEGUARDING PROPRIETARY INFORMATION






TEXTRON'S TRUE NORTH

We properly use, protect, and safeguard intellectual property assets and other proprietary information – whether it is that of the Company or a third party.

Second only to our people, our Proprietary Information is our greatest asset. To protect our competitive position, each of us has a responsibility to properly handle Textron's Proprietary Information. And to fulfill our contractual and legal obligations, we must properly handle the Proprietary Information of third parties entrusted to us.

POINTING THE WAY

Each of us is expected to properly use, respect, safeguard and secure all Proprietary Information, in any form (written, electronic, or otherwise), whether it belongs to Textron or a third party.

-  Only share Proprietary Information with others who are both authorized to receive it and have an actual business need to know the information to perform their job duties
-  Enter into non-disclosure agreements with third parties if it's necessary to disclose Proprietary Information outside the Company
-  Know and follow your Business Unit's policies relating to Proprietary Information, document marking, and transfer restrictions
-  Protect the Proprietary Information belonging to a previous employer and do not share it with anyone inside Textron
-  Honor your obligation to treat information as confidential even if you leave Textron and return all Proprietary Information upon termination of employment

HELPING YOU STAY ON THE RIGHT COURSE

Don't discuss confidential matters with family members or business or social acquaintances or in places where the information may be overheard, like airports, elevators, or restaurants.

ROADMAP

Proprietary Information includes any proprietary, confidential, intellectual property, or trade secret information, whether or not marked, in any form, that is not publicly known, including Classified Information, Controlled Unclassified Information (CUI) and other information received from third parties we are obligated to keep confidential.

Intellectual Property includes our inventions, technical data and computer software, research and processes, as well as trade secrets, know-how, copyrighted materials, trademarks, and patents.

Controlled Unclassified Information (CUI) is information the Government creates or possesses, or that an entity creates or possesses for or on behalf of the Government, that requires safeguarding or dissemination controls pursuant to and consistent with applicable law, regulation and government-wide policies, but is not classified information.

Classified Information is any information required by a government agency to be marked with classified markings and protected against unauthorized disclosure.

TIP

Classified and CUI Information are subject to special safeguarding rules and requirements. If you are entrusted with access to information under a government contract that requires special handling, be sure you are familiar with (and strictly following) the laws, regulations, contractual obligations, and other requirements relevant to that material. Your Security or Legal department can provide guidance.

Resources

[Textron Employee Policy on Information Technology](#)

[Additional Information](#)

PERSONAL DATA PROTECTION







TEXTRON'S TRUE NORTH

We take personal data protection seriously and have effective privacy protections in place when processing personal data.

There are a variety of domestic and international laws governing the collection, processing, and transfer of personal data. At Textron we take care to comply with these laws in each jurisdiction where we operate.

POINTING THE WAY

We must always use care when collecting, processing and transferring personal data.

-  Respect the privacy of others and safeguard the confidentiality and security of personal data to which you may be given access
-  Only collect and use personal data for lawful and legitimate business reasons
-  Limit access to personal data to those who truly need to know; limit the amount of personal data provided to the smallest amount necessary for those persons to perform their job duties
-  Be especially attentive when transferring personal data to an authorized third party, particularly when the transfer occurs outside the country of origin
-  Use non-disclosure agreements, contract clauses or similar measures to safeguard personal information
-  Be aware of and respect local privacy laws

ROADMAP

Personal Data is any information that can be used to identify a specific individual, including their government identification number, email address, name, physical address, biometrics, or economic, cultural or social characteristics.

TIP

Immediately report any concerns you may have regarding data security, whether a suspected data breach or inadvertent transfer of Personal Data, to your Business Unit's Privacy Lead or Textron's Enterprise Privacy Lead. Local laws, in some cases, set strict time limits for reporting the loss of or inadvertent transfer of Personal Data.

Resources

[Textron Personal Data Protection Policy](#)

[Textron Information Security Policy](#)

[Additional Information](#)

INFORMATION GOVERNANCE

TEXTRON'S TRUE NORTH

We maintain our records responsibly, in accordance with the law and Company policy.

Our policies ensure that business records are maintained and protected as required by law, are available when needed, and are disposed of when no longer useful.

POINTING THE WAY

To manage your business records properly:

- Familiarize yourself with our policies on how and where to store business records
- Keep records only as long as necessary for a legitimate business purpose or as legally required
- Follow the guidance specified in your business's record retention schedule and comply with all legal holds
- Know where your business stores its records and maintain them in an organized manner so they can be located when needed
- Securely dispose of records in a manner consistent with confidentiality and the sensitivity of the record

ROADMAP

A business record is any type of record received or created by Textron in the course of business. Records include traditional documents like emails, letters, reports, drawings, and photographs, but they can also take on more modern forms like databases, instant messages, dashboards, and data lakes. If you have any question about what constitutes a business record, consult your Legal department.

TIP

The Textron Legal department may issue a "Legal Hold" that directs you to preserve records. If you receive a Legal Hold notice you must follow its instructions, even if they conflict with a retention schedule. Failure to comply with a Legal Hold, even inadvertently, could expose Textron and you to civil and criminal liability. Consult with your Legal department if you have any questions about a Legal Hold notice.

Resources

[Additional Information](#)

DEDICATION TO SAFETY & ENVIRONMENT

Individually and collectively, we are committed to developing workplaces that are safe for everyone – now and in the future. We also understand our responsibility to ensure a sustainable future for the planet.

SAFETY & ENVIRONMENT

TEXTRON'S TRUE NORTH





We are committed to being an environmentally responsible company and to providing a safe and healthful workplace for our employees.

We comply with applicable environmental, health and safety (EHS) laws and regulations in every country in which we do business and with Textron EHS policies and standards.

POINTING THE WAY

At Textron, we understand our responsibility to ensure a sustainable future for the planet and we are focused on reducing the energy and natural resource intensity of our operations and our products. We are also committed to the health and safety of our employees and will continuously improve our processes, require individual accountability and demonstrate leadership to achieve zero injuries. All workplace injuries and environmental incidents must be reported in accordance with applicable laws and regulations and Textron EHS Policy.

Reports of Significant Events must be made to the Corporate EHS group immediately via the EHS Reporting Hotline 1.800.750.1715 (within the US) or 1.352.547.1715 (outside the US) or via email to significantevents@textron.com. Significant events include:

-  Amputations, overnight hospital stays, fatalities, and other severe injuries
-  Inquiries by government agencies or private parties
-  Fires, explosions, property losses, business interruptions (due to any of the foregoing)
-  Spills, releases, and significant "near misses"









Report any threats, intimidation, or acts of violence to your manager or HR Business Partner. If you feel that you or someone else is in imminent danger, contact local law enforcement authorities immediately.

ROADMAP

In recognition of the fact that global regulations vary and in order to establish consistent expectations with respect to EHS performance across our locations, Textron has developed Enterprise EHS Policies and Standards. All Textron locations must comply with the Textron Global EHS Standards unless a more stringent applicable federal, state or local law exists. If you have any questions, EHS managers and your Business Unit Legal department are available to provide support.

HELPING YOU STAY ON THE RIGHT COURSE

Employee actions must be guided by Textron's EHS Operating Principles:

-  No job or activity is worth risking injury
-  All injuries and environmental incidents are preventable
-  Working safely and in an environmentally responsible manner is a condition of employment
-  Each of us is responsible for the safe behavior of ourselves and others
-  EHS is led by senior management and implemented by line management, with each level accountable to the one above and responsible for the one below
-  We will design and integrate EHS into our products, facilities and our management processes
-  All employees will be provided the necessary knowledge, skills and abilities to work safely
-  Strong EHS performance is good business

Resources

[EHS Policies & Standards](#)

[Additional Information](#)

DRUG & ALCOHOL-FREE WORKPLACE



TEXTRON'S TRUE NORTH

Textron promotes a safe and healthy working environment for our employees by maintaining a drug-free workplace.

Illegal drugs and alcohol can have an adverse effect on employee performance, jeopardize the safety of co-workers, and present a risk to the business and interests of the Company.

POINTING THE WAY

Textron's policy prohibits the following:

-  Possession, use, sale, purchase, manufacture, dispensing, or distribution of an Illegal drug while on Company property, while in a Company vehicle, or while conducting Company business or attending a Company-sponsored event off premises
-  Working, reporting for work, or operating a Company vehicle while under the influence of an Illegal drug or alcohol, or in an impaired condition

ROADMAP

Illegal Drugs include not only drugs whose use, possession, sale, or distribution is prohibited by federal, state, or local law, but also Controlled Substances and Prescription Drugs that are used in a manner that is inconsistent with a valid physician's prescription

Controlled Substances are defined under U.S. Federal law and include Marijuana (cannabis) as a Controlled Substance. Consult Textron's Drug and Alcohol-Free Workplace Policy for more information

Prescription Drugs are those lawfully prescribed by a licensed physician, physician assistant or other licensed health practitioner

HELPING YOU STAY ON THE RIGHT COURSE

Due to the nature of their activities, some Business Units may have stricter or more detailed policies. Always know your Business Unit's requirements.

Certain employee positions, including pilots, mechanics, truck drivers, and other safety-sensitive positions may be subject to additional testing and drug free workplace requirements in accordance with applicable Federal Laws.

TIP

Alcohol is sometimes served at business or social events sponsored by the Company. In addition, employees occasionally entertain customers as representatives of the Company. Moderate use of alcohol is acceptable at these events.

TIP

Anyone reasonably suspected of being in possession of contraband on Textron property, in a Company vehicle, or while conducting Company business is subject to search. Textron reserves the right to search all items located on Company property, such as offices, desks, computers, cars, and lockers to the full extent permitted by applicable law.

Resources

[Textron Drug and Alcohol-Free Workplace Policy](#)

[Additional Information](#)

HUMAN RIGHTS

TEXTRON'S TRUE NORTH

We are committed to promoting and supporting fundamental human rights in our operations.

POINTING THE WAY

We back our commitment to human rights by:

- Maintaining a workplace free of discrimination and harassment, where all employees and others visiting our facilities are treated with dignity and respect
- Providing equal employment opportunity
- Promoting an inclusive and diverse work environment
- Providing equitable compensation and benefits that recognize and reward performance
- Following fair employment practices and applicable employment laws wherever we have operations
- Not tolerating human trafficking activities
- Maintaining a safe work environment
- Championing environmentally sound practices
- Requiring our suppliers to comply with the Textron Code of Conduct for Suppliers and Other Business Partners

TIP

The Federal Acquisition Regulation requires some U.S. Government contractors to have detailed human trafficking policies or specific compliance plans. Know the particulars if your Business Unit has one and be sure you understand and follow its requirements.

Resources

[Textron's Statement on Human Rights](#)

[Textron's Code of Conduct for Suppliers and Other Business Partners](#)

[Additional Information](#)

ROADMAP

Human trafficking may include:

- ✦ Child labor
- ✦ Commercial sex acts and sex trafficking
- ✦ Obtaining labor or services through
 - Coercion
 - Physical threats or restraints
 - Withholding of passports
- ✦ Misleading or fraudulent recruiting and employment practices, such as
 - Charging recruiting fees
 - Denying access to an employee's identity or immigration documents
 - Failing to disclose key terms and conditions of employment

REPORTING

A large, dark blue-tinted photograph of an industrial factory floor. In the foreground, a worker wearing a black cap, safety glasses, and a high-visibility work jacket is looking down at a tablet device. In the background, another worker is visible near a large, complex piece of machinery, possibly a turbine or engine component, which is being worked on. The scene is dimly lit, with light coming from overhead fixtures, creating a professional and technical atmosphere.

REPORTING VIOLATIONS

Each of us has an obligation to promptly report suspected or known violations of the *Business Conduct Guidelines*, law, or Company policy.

RESPONDING TO REPORTS

Doing the right thing means reporting misconduct when you are aware of it. At Textron, we take all reports of possible misconduct seriously and investigate where necessary. We take confidentiality seriously too and will only share information including the identity of the parties as needed.

We can't do anything about misconduct if we don't know about it. When you bring suspected violations to our attention by reporting them, you give Textron the ability to resolve issues before they can become bigger problems.

If a violation is substantiated, we will take steps to correct the situation, including appropriate disciplinary action against anyone who has violated the BCGs, the law, or Company policy – which may include termination of employment.

Textron expects every employee to cooperate fully and honestly in any investigation.

ZERO TOLERANCE FOR RETALIATION

Textron is committed to creating an environment where individuals can raise questions or concerns without fear of retaliation. Textron will not tolerate acts of retaliation against anyone who makes a good faith report or cooperates in an investigation – even if the concern raised turns out to be unfounded. Anyone found to have engaged in retaliation will be subject to disciplinary action.

A **Good Faith** report is one that you believe to be true. Anyone making a report not in good faith is subject to disciplinary action.

Retaliation can occur when an adverse job-related action is taken against someone specifically because they made a complaint or participated in an investigation. It might include discipline, threats, poor performance reviews, denying promotions or benefits, exclusion from projects, meetings, or company activities, or job or shift reassignment.

REPORTING RESOURCES & HELPLINE

Part of our commitment in guiding you to the right result – Textron’s True North – is making sure you have the resources to get there. So, whether you wish to report a suspected violation of the BCGs or other unlawful or unethical conduct, or you simply have a question and seek advice, Textron has many options available to you.

YOU MAY MAKE REPORTS OR SEEK GUIDANCE FROM:

- Your supervisor
- Your Human Resources Business Partner (or your Business Unit Advisor network)
- Any member of your local management team
- Your Business Unit Ethics & Compliance Team
- Your Business Unit Legal department
- Textron’s Ethics & Compliance department
- Textron’s Executive Vice President and General Counsel
- Textron’s Ethics & Compliance *Helpline*

TEXTRON’S ETHICS & COMPLIANCE HELPLINE

Textron’s Ethics & Compliance *Helpline* is one of many resources available for asking questions, raising concerns, or reporting suspected misconduct.

The Textron *Helpline* is available online and via telephone and is managed by an independent third party. This means that you can make truly anonymous reports where permitted by law. Reports made to the *Helpline* are furnished by the third party to Textron’s Ethics & Compliance Department for further handling.

The *Helpline* is available 24 hours a day, 7 days a week, 365 days a year, in multiple countries and languages.


 www.textron.com/helpline

 **1.800.892.9871**

[toll free in the U.S. & Canada]

[International Numbers](#)


YOU MAY CONTACT TEXTRON’S ETHICS & COMPLIANCE DEPARTMENT DIRECTLY AT:

 **Textron Inc.**
40 Westminster Street
Providence, RI 02903
Attn: Ethics & Compliance Dept.

 **ecompliance@textron.com**
 **1.401.457.6006**

TEXTRON BOARD OF DIRECTORS

Concerns, including those about accounting, internal accounting controls, and auditing matters may also be reported to the Textron Board of Directors or the Audit Committee:

 **Textron Inc.**
40 Westminster Street
Providence, RI 02903
Attn: [Board of Directors or Audit Committee]

 **textrondirectors@textron.com**
 **1.866.698.6655 or 1.401.457.2269**

The requirement in these BCGs to report suspected or known violations to someone within the Company should not be construed as preventing reports of possible violations to appropriate government authorities.