

Transparency in Supply Chains Act Ontic Engineering and Manufacturing 2021 Statement

Ontic Engineering and Manufacturing and its subsidiaries and affiliates is a value-based organization dedicated to being the world's leading provider of aviation support and aftermarket services with the overarching objective to deliver exceptions, long-term, sustainable value for all our stake holders. Our Vision, Mission and Values are aligned across all our businesses together as one team. Our Values describe our aspirations both as individuals and as a company and we endeavor to always behave in ways that are consistent them .

ONTIC Culture – The Ontic Effect

Our culture consists of four pillars; our vision, our mission, our promises and values, and our effect. Our Vision is that we are a new lease on life for the aerospace and defense industry. Our Mission is to be more than the sum of our parts. Our Promise and Values are to embrace challenge using a common-sense freedom to choose and create opportunities to make change for the better. Ultimately, our Effect is intended to be the most trusted partner that keeps aircraft flying safely and for longer by giving parts a new lease on life that keeps the world turning.



Our businesses and supply chains

We support our customers through our international group of businesses: Ontic Engineering and Manufacturing, Inc., Ontic Engineering & Manufacturing UK Ltd, Ontic APPH Ltd., Ontic Engineering & Manufacturing Asia-Pacific Pte Ltd, Firstmark Aerospace Corp., Centroid, Inc., Aircraft Belts, Inc. and Twin Commander Aircraft, LLC., collectively Ontic.

Ontic is a leading provider of high-quality and cost-effective solutions for the support of maturing and legacy aviation and aerospace platforms with six different locations in North America, Europe and Asia. The great majority of our operations and employees are in the USA and Europe.

Ontic has dedicated teams at its separate locations responsible for sourcing and managing supplier relationships. This is done while also adhering to our procedures and policies governing compliance with vetting of third-party business partners and the ethical conduct of Ontic's business.

Our policies

Ontic's commitment to ensuring that modern slavery and human trafficking is not taking place in our businesses or supply chains is embedded in business and ethical conduct policies. We recognize the importance of human rights and support the principles set forth in the UN Universal Declaration of Human Rights and we are committed to treating people according to merit and contribution, refraining from coercion and never deliberately causing harm to anyone.

Ontic's ethical business conduct governance known as its Code of Business Ethics includes policies, procedures and internal controls designed to address specific issues, conduct and risks. Ontic requires all employees, officers, and directors to conduct themselves according to the language of these policies and are required to avoid even the appearance of improper behavior.

We utilize our Third Party Vetting Policy to set out the guidelines and procedures that must be followed in assessing Ontic's business partners through due diligence. Depending on the relative risk identified as associated with a third party (determined using criteria such as country, proposed relationship etc.), we undertake standard or enhanced due diligence on all third parties, including suppliers, contractors and service providers.

Our employee handbook details open (or anonymous) reporting options for the disclosure of unethical conduct retaliation. Any actual or suspected unethical business practices must be reported. The procedure enables anyone working for an Ontic company who suspects that any unethical business practice is occurring (or is likely to occur) by any Ontic officer, director or employee or by any supplier, agent, distributor or other person providing services of acting on behalf of Ontic, to raise the matter immediately without fear of recrimination.

Our efforts to identify modern slavery risk in our businesses and supply chains

Verification

Ontic conducts due diligence on each of its suppliers, contractors and service providers pursuant to our Third Party Vetting Policy and other standard vendor management reviews, which result in a detailed understanding of our business partners, their businesses and what products or services they provide to Ontic businesses.

Audits

To the extent we audit our suppliers, we do so ourselves utilizing personal from our Quality or Supply Chain organizations. While we may visit suppliers on an unannounced basis or with short notice, audits are scheduled in advance to ensure appropriate supplier personnel are present to answer questions.

The effectiveness of our efforts

To date we believe Ontic has been high effective in preventing modern slavery and human trafficking from existing in our businesses and in avoiding undesirable business partners due to our existing policies and procedures. However, given the world is an ever evolving place , we intend to review and assess our existing internal controls to determine their effectiveness in managing risk to the integrity of our supply chain and adjust our policies and procedures accordingly.

Training

Our policies, standards and internal controls, together with our values and our focus on safety, underpin our approach to risk management. We are committed to being a responsible business and our leaders are responsible for embedding this into Ontic's culture, our decision-making and how we

work. To achieve this, Ontic has comprehensive training programs to ensure that our employees are appropriately informed and trained on Ontic's policies.

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