



GLOBAL BUSINESS PARTNER CODE OF CONDUCT

The long-term success of the Heico Companies, L.L.C.'s ("Heico") as a business is dependent on many factors, one of which is always conducting business the "right way." Our Code of Conduct and Compliance Manual remind us that business results are never more important than ethical conduct and compliance with all applicable laws. This Global Business Partner Code of Conduct ("Code") sets forth the principles and ethical standards we expect the sales agents, distributors, resellers, consultants, service providers, buying agents, joint venture partners, and other providers of goods and services to, or on behalf of any Heico company (our "Business Partners") to meet. As our Business Partner, we require you to train your employees to understand and comply with this Code. Business Partners who knowingly violate laws or repeatedly fail to conform to these principles will not receive our business.

LEGAL COMPLIANCE

We expect each of our Business Partners to conduct business in full compliance with all applicable national, regional, state and local regulations and laws of the countries in which they operate. This includes all trade, export and import controls, chemical regulations and all applicable antitrust and fair competition laws. Business Partners must maintain accurate financial books and business records in accordance with all applicable legal and statutory requirements and accepted accounting practices.

ETHICAL BUSINESS PRACTICES

We conduct our business ethically and honestly. Heico strictly prohibits any of its Business Partners from engaging in any form of public sector or commercial bribery or any act intended to induce the recipient to misuse his or her position to obtain or retain an unfair business advantage or personal benefit. Further, our Business Partners should have policies and controls in place to prohibit and detect misuse of company assets, conflicts of interest, improper gifts, fraud and embezzlement. Our Business Partners should comply with the Gifts, Entertainment and Travel provision within our Code of Conduct when dealing with Heico Company employees and comply with both the letter and the spirit of such rules.

HUMAN RIGHTS

We are committed to treating our employees, our customers and each of our Business Partners with dignity and respect for human rights as set out in the United Nations Declaration of Human Rights. We expect that each of our Business Partners will have controls in place that:

- Prohibit child labor, forced or compulsory labor and human trafficking;
- Ensure compliance with applicable wage, hour and benefits laws, including minimum wage, overtime and maximum work week laws;
- Verify the employment eligibility of employees;
- Respect the right of employees to freely associate, organize and legally bargain collectively;



- Ensure a workplace free from discrimination and harassment;
- Prevent Conflict minerals, whose obtainment is linked to human rights violations, from being used by you or your subcontractors. Our Business Partners must meet the conflict mineral reporting requirements as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Securities and Exchange Commission; and
- Provide safe and healthy work environments for workers. All working conditions must comply with applicable laws and industry standards, including clean and safe housing.

CONFIDENTIALITY AND PRIVACY

Business Partners with access to confidential and proprietary information about any Heico company must not disclose that information to any other person or entity without our prior written consent. Additionally, all Business Partners must protect from unauthorized disclosure any private information regarding any Heico company customers or Heico company employees that they may receive, including home addresses, Social Security numbers, birth dates or medical information. Any unauthorized disclosure of confidential or private information related to any Heico company, its employees or customers must be reported immediately to Heico Compliance or the Heico Legal Group.

SPEAKING UP, NO RETALIATION

We encourage our employees and the employees of our Business Partners to speak up if something does not seem right. Our Business Partners are expected to report any concerns or suspected violations of this Code to any Heico Company manager or to the Help Line, 1-800-308-3904, available 24 hours a day, 7 days a week. All reports are confidential and may be provided anonymously where permitted by law. Business Partners must have a “no retaliation” policy that ensures that any employee may report concerns to any Heico Company employee without fear of retaliation or reprisal by the Business Partner’s management.

VERIFICATION OF BUSINESS PARTNER COMPLIANCE

Heico seeks to conduct business with Business Partners who do business in accordance with the principles articulated in this Business Partner Code. We may monitor and enforce this Code through audits, and we require our suppliers to allow us access to their facilities as well as all relevant records for such purposes. If a Business Partner violates this Code, we may terminate the business relationship or require the Business Partner to implement a corrective action plan. Our Business Partners must inform Heico immediately of any departure from this Business Partner Code, including regulatory compliance failures or other events that may put our businesses at risk or cause damage to our reputation.