Policy: Ethics and Business Conduct

Reference: CA-EBC 1_Ethics and Business Conduct Policy_v1 **Issuing date:** September 2007

Meggitt PLC and all subsidiary companies will conduct business fairly, impartially, and in full compliance with all applicable laws and regulations, including the Common Industry Standards adopted by the Aerospace and Defense Industries Association of Europe. Meggitt is firmly committed to integrity and honesty in all its business relationships; including those with customers, suppliers, communities and amongst its employees. The highest standard of ethical behaviour is expected from Meggitt employees, directors and from those who act on the Company's behalf in the performance of their professional responsibilities and in their own personal conduct.

A Code of Conduct as adopted by the Board will be provided to all employees and directors. This will advise employees and directors of their ethical responsibilities and how the Company will help in ensuring that these responsibilities can be fulfilled.

Other related policies and procedures will be adopted from time to time to assist in the implementation of this Policy. These will include Standards of Business Conduct for US Government Contracting. These additional policies and procedures will be made available to all employees and directors, as applicable.

An Ethics and Business Conduct Programme will be implemented across the Group. This will include training and awareness presentations which will be made available to all employees and directors. There will be regular monitoring of the Ethics and Business Conduct Programme and of compliance with the Code of Conduct.

The Board delegates responsibility for oversight of the Ethics and Business Conduct Policy to the Ethics and Export Compliance Committee. The Chief Executive and Group Corporate Affairs Director will have executive responsibility and will report at least twice a year on these matters to the Ethics and Export Compliance Committee and at least once a year to the full Board. Managing Directors, Presidents and General Managers are responsible for local implementation of this policy.

Originally approved by the Board on 12 May 2005 and updated and re-approved by the Board on 27 September 2007.