



SUPPLIER CODE OF CONDUCT

At Aerojet Rocketdyne we are committed to the highest standards of ethics and business conduct. That commitment is reflected in our Values that guide us in our daily operations and business relationships: Accountability, Adaptability, Integrity, Excellence and Teamwork. The Supplier Code of Conduct sets forth the expectations we hold for every third party who works on our behalf and reflects the standards we set for our own employees. Suppliers are important to our success so we ask them to align their values and ethics with our own. Suppliers shall ensure staff is aware of the importance of ethical behavior and their contribution to product safety and conformance to contractual requirements.

Compliance with Laws

We expect our suppliers to fully comply with all laws and regulations applicable to the operation of their business and their relationship with Aerojet Rocketdyne.

not violate local law. We expect our suppliers to comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

Good Faith

We expect our suppliers to conduct all business in good faith, make all required disclosures, and avoid actual or apparent conflicts of interest (whether based on financial interests, family relationships, or any other circumstances).

Gifts/Business Courtesies

We expect our Suppliers to compete on the merits of their products and services and not to use the exchange of business gifts, meals or entertainment to gain an unfair competitive advantage. Our employees who are in any way involved in procurement decisions are subject to strict limitations and may not accept any business courtesy from a supplier with the exception of promotional items. In any business relationship, our supplier must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organization, and are consistent with reasonable marketplace customs and practices.

Export/Import Control

We expect our suppliers to ensure their business practices are in accordance with all applicable laws and regulations governing the export and import of domestic and foreign origin parts and components and related technical data.

Human Trafficking

We expect our suppliers to adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate. Our suppliers must refrain from

Anti-Corruption

We expect anyone conducting business on our behalf, including suppliers, from offering, making, or providing any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. We strictly prohibit facilitating payments intended to expedite or secure performance of a routine government action like obtaining a visa or customs clearance, even in locations where such activity may

violating the rights of others and address any adverse human rights impacts on their operations.

Conflict Minerals

We expect our suppliers to take steps to determine if their products contain conflict minerals (tin, tantalum, gold and tungsten) and if so, implement a supply chain due diligence process to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly benefit armed groups in the Democratic Republic of Congo or adjoining countries. We also expect our suppliers to respond timely to our annual survey regarding the use of conflict minerals in their products that are delivered to Aerojet Rocketdyne.

Harassment

We expect our suppliers to ensure their employees are able to perform work in an environment free from physical, psychological and verbal harassment, or other abusive conduct.

Non-Discrimination

We expect our suppliers to provide equal employment opportunity to employees and applicants for employment, without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability, so long as the essential functions of the job can be competently performed with or without reasonable accommodation.

Safety, Health & Environment

We expect our suppliers to operate in a manner that actively manages risk, conserves natural resources, and protects the environment. We expect our suppliers to comply with all applicable safety, health and environment laws and regulations. Suppliers should protect the health, safety and welfare of their people, visitors, and others who may be affected by their activities.

Quality

We expect our suppliers to take due care to ensure their work product meets our company's quality standards with zero escapes to Aerojet Rocketdyne. We expect suppliers to regularly review their quality scorecard and take action to achieve and maintain 100% quality performance. We expect our suppliers to have in place quality assurance processes to identify defects and implement corrective actions and to immediately notify us if you become aware of any discrepant hardware that has been delivered to Aerojet Rocketdyne or our customers. Effective processes should be in place to detect counterfeit parts and materials, and exclude them from the delivered product and to immediately notify us if you become aware of any counterfeit part that was used in a product delivered to Aerojet Rocketdyne. Suppliers shall ensure staff are adequately trained and provide evidence of training upon request.

Confidential/Proprietary Information

We expect our suppliers to properly handle and protect all sensitive information, including confidential, proprietary, and personal information and that contained in information systems which suppliers use to conduct business with Aerojet Rocketdyne. This also includes having the systems and processes in place that will safeguard and protect our sensitive information and inform us immediately if there is a release of our sensitive data. In addition, our information should not be used for any purpose other than the business purpose for which it was provided.



Reporting

We expect our suppliers to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. We expect our suppliers to take action to prevent, detect, and correct any retaliatory actions.

In the event that you become aware of misconduct related to our company business by any Aerojet Rocketdyne employee, any of your employees, or any employees of your business partners, we expect you will promptly notify our company. You may contact the Ethics & Compliance Office at ethics@rocket.com or the Ethics, Compliance & Safety Helpline: (855) 346-5043 or online reporting through link located on

www.rocket.com/ethics. This may require notification of any changes to any Aerojet Rocketdyne Annual Business Certification provided to support award of any purchase order, subcontract or agreement.

Disclaimer: The expectations set forth in this Code are not intended to conflict with or modify the terms and conditions of your contracts with Aerojet Rocketdyne. If a contract requirement is more restrictive than this Code, you must comply with the more restrictive contract requirement.