

A man and a woman are in a control room. The man is sitting at a console with multiple monitors, pointing at one of them. The woman is standing next to him, looking at the same monitor. The room is dimly lit with blue light. There are several monitors and consoles visible. One monitor shows a technical diagram, and another shows a cityscape. The man is wearing a dark polo shirt, and the woman is wearing a checkered shirt. The overall atmosphere is professional and focused.

Rockwell Collins

Standards of
Business Conduct

**Rockwell
Collins**

Building trust every day



Ethics is good business and trust
is at the heart of all we do.

We operate in an industry that requires extraordinary trust. In the military, our war fighters' lives depend on the reliability of our products and services every day. Likewise, the lives of people on board commercial and business aircraft around the world depend on equipment designed and manufactured by our company.

But creating a foundation of trust requires much more than building high integrity products. It requires ethical relationships with others, compliance with laws and regulations, and personal accountability to the highest standard of business conduct. It requires communication and training about the importance of ethics, providing clear expectations about our Standards of Business Conduct, and creating an environment in which our people can bring forward concerns without fear of retaliation.

But ultimately, we build trust every day through our actions. Because it's not just the words we say – it's the choices we make. We must do the right thing, the right way, for the right reasons, every time.

In all of these ways, we maintain our commitment to unquestioned integrity at Rockwell Collins. Because of the importance of ethical business conduct within our company, I encourage you to keep this code of conduct in a convenient place for easy reference. Review it whenever you encounter any issues – or when you need resources to answer questions you may have about our Standards of Business Conduct.

Thank you for your individual commitment to ethical business conduct at Rockwell Collins. It's the right thing to do for our customers, our shareowners, and our people as we work together to build trust – every day.

A handwritten signature in black ink that reads "Clay". The signature is written in a cursive, flowing style.

Clay Jones,
Chairman, President and CEO

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A large, white, rectangular sign stands on a grassy area. The sign features the Rockwell Collins logo, which consists of the word "Rockwell" in a bold, black, sans-serif font above the word "Collins" in a similar font. A small orange square is positioned between the two words. Above the sign, three orange diagonal stripes are visible. In the background, there is a modern building with a dark facade and a large, leafless tree. The sky is clear and blue.

**Rockwell
Collins**

Building trust

Our shared vision of creating the most trusted source of communication and aviation electronic solutions depends on building trust. Trust has proven to be a foundation for our success. To demonstrate anything less than complete honesty, integrity and fairness to our customers, suppliers, shareowners and each other can undermine what we are all working so hard to achieve. As a critical component, our company maintains a vigorous and effective program to ensure that the letter and spirit of these Standards of Business Conduct are fulfilled.

Ethics policy and standards

It is our policy to conduct business honestly, ethically and in accordance with applicable laws of the U.S. and other countries and jurisdictions in which we operate. We are also committed to the highest ethical standards, and all employees and applicable third parties are expected to adhere strictly to our Standards of Business Conduct.

Our company's reputation for integrity is a valuable asset. We are guided at all times by the highest standards of integrity and personal conduct at work, whether we are dealing with coworkers or others. It is each employee's responsibility to be aware of, understand and adhere to our Standards of Business Conduct and the laws and regulations that are applicable to his or her job responsibilities.

Our ethics policy and our Standards of Business Conduct are designed to promote:

- › Honest and ethical conduct
- › Full, fair, accurate, timely and understandable disclosure in public communications
- › Compliance with all applicable laws, rules and regulations
- › Fair dealing with the company's customers, suppliers, competitors and employees, including properly maintaining the confidentiality of sensitive information
- › Protection and proper use of company assets
- › Prompt internal reporting of violations of law or the principles set forth in this document to appropriate personnel identified in this code of conduct
- › Accountability for adherence to these standards

Applicability

Our ethics policy (RC-ADM-POL-008) and this code of conduct, which we refer to as our Standards of Business Conduct apply to all Rockwell Collins employees, contract employees, consultants and representatives (hereafter referred to as "employees and applicable third parties"). Members of the Board of Directors of Rockwell Collins, Inc. are also covered under our ethics policy and our Standards of Business Conduct to the same extent as if they were employees of the Company.

Any waiver, including implicit waiver or pre-approval, of our Standards of Business Conduct, including a conflict of interests or corporate opportunity, in any material respect for any chief executive officer, principal financial officer, principal accounting officer or controller, any other executive officer, or a member of the Board of Directors of Rockwell Collins, Inc. must be reviewed and approved by the Board of Directors or a Board committee.

Ethical decision making

Our Standards of Business Conduct provide clear expectations for how to conduct business at Rockwell Collins. In all circumstances employees and applicable third parties are expected to operate with ethical conviction. However, it is not always easy to determine the right thing to do in a particular work situation. In some cases the complexity of the situation may mean the right decision is not clear. You may face situations in which,

although an action would not violate a law or a company policy, it does not seem to be the right thing to do. At Rockwell Collins it is important to consider the matter in the context of our ethical philosophy and standards. To assist you, the decision-making process provides a consistent approach to the evaluation of ethical dilemmas you may face in a fast-paced and challenging business climate.

When making decisions, consider the following elements:

Review the facts	<ul style="list-style-type: none">> What are the relevant facts?> Does it comply with our Standards of Business Conduct and related company policies?> Does it violate any laws or regulations?
Analyze the situation	<ul style="list-style-type: none">> How would my decision affect me or the company in the short- and long-term?> Could my decision adversely impact our company's ability to win business or our reputation as an honest and ethical company?
Consider the implications	<ul style="list-style-type: none">> How comfortable would I be if my actions were displayed on national television, the Internet, or in front of my leader or a loved one?> How will it look to others (i.e., will it create the appearance of impropriety)?
Use your resources	<ul style="list-style-type: none">> Where can I go to find additional information, assistance or guidance? Are there company policies or procedures in addition to our Standards of Business Conduct that can help me?> Do I need to contact my leader, the Ombudsman, Human Resources or the Office of the General Counsel?

Where to go for help

If you have questions about our Standards of Business Conduct as it applies to a specific situation, please refer to one of the resources listed below.

Leadership

Our leaders are available to discuss your ethical concerns or questions. They may refer you to another resource, but under most circumstances this should be your first point of contact.

Ombudsman

Contact the Ombudsman using the Ethics Line to get answers to your questions, seek guidance, express concerns or report suspected violations of our Standards of Business Conduct. Contact information for the Ombudsman is available at the back of this document.

Human Resources

Contact your local Human Resources representative or the Human Resources Service Center at 1-319-295-4747 with employee relations matters or issues involving employee-related concerns.

Office of the General Counsel

Contact the Office of the General Counsel (“OGC”) to obtain legal advice or assistance with interpretation of laws, regulations or company policies that address legal compliance matters. Contact information for members of the OGC is available on the OGC Webpage on Rockwell Collins Online.

Your role

We expect every employee to do the right thing, for the right reason, in the right way, every time. All of our employees must strive to succeed in all our business endeavors, but this success must never come at the expense of our ethical standards. To that end it is the personal responsibility of every employee to ensure that the company’s business is conducted in absolute compliance with applicable laws and company policies.

It is critical for you to understand our Standards of Business Conduct and to adhere to them in your work for Rockwell Collins.

If you are unsure about any aspect of the expectations set forth in this code of conduct, seek guidance from a leader, the Ombudsman, Human Resources or the Office of General Counsel.

Reporting concerns

Employees and applicable third parties with knowledge of a violation of our Standards of Business Conduct or the laws or regulations governing our business are expected to promptly report such violations to their leader, a Human Resources representative, the Ombudsman or the Office of the General Counsel.

Any leader receiving a report is expected to promptly report the matter to higher management and to the Ombudsman and take such further action as higher management or the Ombudsman may direct.

Rockwell Collins Ethics Line

Contact the Ombudsman using the Ethics Line or any of the other methods listed at the back of this document to ask questions, seek guidance, express concerns or report suspected violations of Rockwell Collins' Standards of Business Conduct. Reports to the Ombudsman may be made anonymously unless prohibited by local country laws. Confidentiality will be maintained to the extent permitted by law and by the company's need to conduct a thorough investigation and take appropriate actions.

Retaliation

Retaliation by any employee against an individual who reports a violation of law or company policy is strictly prohibited. No hardship, loss of benefit or penalty – which may include downgrading an employee's performance rating, limiting an employee's opportunities for assignments or advancement, excluding an employee from corporate or departmental functions, or general mistreatment – may be imposed on an employee as punishment for:

- Filing or responding to a good faith complaint, or
- Cooperating in an investigation.

Violation and sanction

Any employee who violates the law or any of the company's policies or these Standards of Business Conduct is subject to strict disciplinary action which, without limitation, may include discipline or other employment action up to, and including discharge.

Additionally, any employee who knowingly makes or refers a false allegation to the Ombudsman or management or deliberately provides false information or refuses to cooperate in an investigation shall be subject to strict disciplinary action.

Your role in reporting concerns and avoiding retaliation

If you have any questions about our ethical standards or would like to report a suspected violation of these Standards, you are expected to share your concern.

If a report of a potential violation is made against you, you are expected to cooperate with the company's investigation and take no retaliatory action against the person who reported or who you believe reported the matter.

If you are aware of, or should have been aware of a violation of law or these Standards and fail to make an appropriate report, you may also be subject to discipline. If unsure of your responsibility to report, contact the Ombudsman for guidance.

If you are a leader and fail to perform your duties adequately and this failure contributes to a violation or the continuation of an ongoing violation of law or any of our Standards of Business Conduct, you may also be subject to discipline.

Rockwell Collins Ombudsman

Ethics Line

U.S. toll free: 1-866-224-8137

International: +1-319-295-7714

email

Ombudsman@rockwellcollins.com





Building trust by creating a safe and secure environment for all employees

Rockwell Collins provides a work environment that allows employees the opportunity to contribute to the best of their abilities. We create a safe and secure environment for all employees and applicable third parties through compliance with environmental and safety rules and regulations. Any type of discrimination, harassment or workplace violence is not tolerated.

Employee health, safety and the environment

It is company policy to comply with all applicable environmental, health and safety laws and regulations, and encourage stewardship of the environment. Through continuous improvement programs we strive to exceed applicable environmental and employee health and safety standards by:

- Providing a safe work environment for all employees and applicable third parties
- Eliminating or minimizing the generation of hazardous and other wastes
- Conserving energy, water and raw materials.

Governments in many of the countries in which we operate have established strict standards for the storage, use, treatment and disposal of a variety of materials in order to promote employee health and safety. Failure to properly conduct our business operations can have serious and damaging consequences for our employees, neighborhoods, customers, shareowners and the environment.

Your role in employee health, safety and the environment

Make sure you understand the health, environmental and safety laws and regulations in the country in which you work and comply through adherence to applicable company policies and procedures.

Properly store and dispose of hazardous or controlled chemicals or materials, regardless of the size or amount.

Conduct your work in a manner that protects the health and safety of your coworkers and the environment. Report risks and violations to leadership, Environment, Safety and Health, Human Resources or the Ombudsman.

Discrimination, harassment and workplace violence

Discrimination, harassment, workplace violence or other behaviors that negatively affect an individual's work performance or create an intimidating, hostile or offensive work environment that is pervasive or severe enough to alter the conditions of an employee's job and create an abusive working environment are prohibited.

Discrimination

The company prohibits discrimination based on age, race, color, religion, national origin, gender, sexual orientation, physical or mental disability, and veteran status or other protected classes. This applies to all terms and conditions of employment.

Harassment and sexual harassment

The company is committed to providing a work environment free of all forms of harassment or sexual harassment, which includes:

- › Any unwelcome behavior, such as verbal or physical conduct designed to threaten, intimidate or coerce
- › Verbal taunting (including racial and ethnic slurs)
- › Negative stereotyping
- › Unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature in which:
 1. Submission to the conduct is either an explicit or implicit term or condition of employment;
 2. Submission to or rejection of the conduct by an individual is used as the basis for making employment decisions, including advancement, affecting such individual – known as “quid pro quo,” or “this for that.”

Your role in avoiding discrimination, harassment and workplace violence

You are responsible for your actions while conducting company business and are expected to treat coworkers, vendors, clients and customers with respect.

Do not treat another employee differently based on his or her age, race, color, religion, national origin, gender, sexual orientation, disability, veteran status, or other protected classes.

Ensure your safety and the safety of other employees is never put at risk by the words, threatening behavior or actions of anyone in the workplace.

If you observe a behavior which discriminates, harasses, threatens or endangers the safety of others, you are expected to inform your leader or another member of management, Human Resources or the Ombudsman.

Favoritism

Workplace violence

An employee who commits or threatens to commit a violent act – such as fighting in the workplace or striking another employee – or attempts to bring a weapon to work shall be subject to disciplinary action up to and including discharge. Violence or a threat of violence committed during non-work times or off company premises will likewise be subject to disciplinary action if the violence or threat of violence is determined to be work-related.

Preventing harassment, discrimination, threats and a hostile work environment is a matter of respecting each others' rights and dignity, which is a basic value at Rockwell Collins.

All hiring, evaluation, promotion and other business decisions made by company management and employees must be made solely based upon sound business considerations. Bias and favoritism – such as the influence of conflicting interests, or other improper influences – are prohibited. Favoritism is counterproductive to honesty and destroys trust. Fairness and honesty to our customers, suppliers, shareowners and each other builds trust.

Your role in avoiding favoritism

Ensure that relationships you build with your supervisor, peers or subordinates do not create or give the appearance of favoritism.

Exaggerated praise or muted criticism toward a supervisor or any other for the purpose of gaining favor must be avoided.

Ensure that all actions that may indicate favor are based strictly on job performance rather than age, race, color, religion, national origin, gender, sexual orientation, physical or mental disability, and veteran status or other protected classes.



Building trust through high integrity products and information

It is our company's policy to be ethical and honest with our stakeholders and each other to ensure we never compromise the trust placed in us. This includes complying with all laws governing our corporation and acting with integrity in the communities where we live and work.

Conducting business with integrity also extends to the quality and integrity of our products and safeguarding sensitive or confidential information.

Product integrity

Company products and services must be accurately represented to company customers and meet or exceed requirements for safety, reliability, quality and performance throughout their life cycle. Products must be designed, manufactured and tested in strict accordance with all contract requirements and deviations appropriately documented and approved. This requirement extends beyond products manufactured by the company to include components manufactured by suppliers and sold by the company or contained in one of our products.

Rockwell Collins is committed to providing the best quality, delivery and service. Our reputation depends on compliance with all applicable certifications and telecommunications regulations, together with diligent adherence to customer and contractual specifications. Any unauthorized deviation could violate the contract and adversely affect our customers' faith in the integrity of our products.

Your role in product integrity

In all work, ensure you are adhering to customer and contractual requirements.

If any deviations from a design or the contract requirements are necessary, ensure that they are properly documented and approved in accordance with company procedures before implementing.

All testing requirements and manufacturing procedures required by the contract or customer manufacturing instructions must be followed when building our products. If you are unclear about the contract requirements, contact your leader or the program leader for guidance.

Report any concerns with the integrity of our products or services to your leader, the Product Integrity Council or the Ombudsman.

Safeguarding sensitive information

All employees and applicable third parties are expected to proactively safeguard all information that could reasonably be considered sensitive company information, which includes company official, confidential, non-public and proprietary information, or information that could be of use to competitors or harmful to the company or its customers.

No employee – either directly or through an intermediary – may knowingly seek or obtain information from or concerning a customer, consultant, subcontractor, supplier, competitor or other party, unless the information is publicly available or provided with the written consent of the concerned party. This extends to confidential, proprietary or competition-sensitive information prepared by or for the government or another company. The obligation to preserve sensitive information belonging to another company or to Rockwell Collins continues after employment ends.

Employees and applicable third parties are expected to be aware of the sensitivity of the information they encounter or possess. Additionally, great care in the communication of company sensitive information must be taken to ensure it is shared with only those individuals who are authorized to receive or view the information.

Using another company's proprietary information without permission can have serious implications. Unauthorized disclosure of company sensitive or unauthorized possession or use of someone else's sensitive information – including that of competitors, customers, suppliers, subcontractors or individuals – could compromise customer trust in Rockwell Collins and may expose the company and the employee to legal liability. If governing laws are violated, the company and the person or persons involved in the violation could face substantial fines and imprisonment.

Your role in safeguarding sensitive information

Safeguard all Rockwell Collins sensitive information.

You should not share proprietary information belonging to your previous employer with any person at Rockwell Collins.

Always ensure proper authorizations are obtained before using proprietary information belonging to other companies.

If you accidentally receive or are shown information that you believe is proprietary information belonging to another company, ensure that you do not

view, share or distribute the information and immediately contact your leader and Intellectual Property Counsel for guidance.

Remember, your obligation to protect Rockwell Collins' sensitive information extends not only to your period of employment, but also after your employment with Rockwell Collins ends.

When disposing of sensitive information, ensure it is done in a manner consistent with company policy and procedure and that the information cannot be intercepted or accessed.

Data privacy

Rockwell Collins is committed to ensuring that personal data, such as personally identifying information, and financial data is processed in accordance with worldwide data protection legislation in the countries in which we do business and in which our employees hold citizenship. All employees and applicable third parties who are granted access to company-controlled personal data are required to safeguard such data. Personal data may only be collected if there is a specified, legitimate business purpose and such data shall not be processed in ways that are incompatible with the stated purpose. Data gathered must be relevant and not excessive to the purposes for which it is collected and used. Sensitive personal information can only be accessed or viewed by those who have obtained appropriate permission.

The company is the custodian of personal data belonging to employees and others with whom we conduct business.

The European Economic Area, other jurisdictions and many government agencies in the United States have passed various data protection laws and regulations requiring data that personally identifies individuals be protected from misuse, unauthorized access and transmission. Misuse could result in significant financial or social harm, including:

- › Discrimination based on age, race, color, religion, national origin, gender, sexual orientation, physical or mental disability, and veteran status or other protected classes
- › Identify theft
- › Access to money, goods, services, or any other thing of value

Violation of the laws and regulations governing data privacy can result in fines and penalties to the company or criminal prosecution to the individual who compromises the information.

Your role in data privacy

Ensure you are authorized to collect, access, view, or distribute personal information before doing so.

If your job requires access to personal data, protect that information from unauthorized access according to law and company policy.

In the event of a data security breach related to sensitive personal data, employees shall promptly notify the company's Data Privacy Administrator, Human Resources, or the Ombudsman.

Company books, records and reports

All company books and records must be maintained in accordance with good accounting practices and all applicable laws and regulations. No false, misleading or artificial entries may be made in the books and records of the company.

Accounting, internal controls and audit

The company has established and maintains an effective internal control system and audits to provide reasonable assurance that transactions are executed in accordance with proper management authorization and are properly reflected within the company's financial statements in accordance with U.S. and local statutory accounting principles, where applicable.

As a public company there can be no compromise in the proper maintenance of our books, records and reports. The information from these records becomes a building block for our public reports to shareholders and regulators as well as for prices charged to our customers.

Disclosure of material information

The company will provide fair, accurate, timely and understandable disclosures in its public communications. Information is considered "material" when an investor considers it important when deciding whether to buy or sell securities or stocks, or the information could be viewed as altering the "total mix" of information made publicly available.

Selective disclosure of material nonpublic information to certain investors (such as securities analysts or institutional investors) is strictly prohibited and violates U.S. Securities and Exchange Commission (SEC) rules. Failure to disclose material nonpublic information in public filings that make our public records misleading may subject the company or its employees to substantial fines or imprisonment.

Your role in accurate company books, records and reports

Immediately upon discovery, promptly report the following matters to the Corporate Controller or the Ombudsman:

- Fraud or deliberate error in the preparation, evaluation, review, audit, recording or maintenance of any public financial statement or record of the company;
- Deficiencies in or noncompliance with the company's internal accounting controls;
- Misrepresentation or a false statement regarding a matter contained in the public financial records, financial reports or audit reports of the company, or;
- Deviation from full and fair reporting of the company's financial condition, results or operations or financial statements.

Delegation of authority

The company has created a Delegation of Authority policy that addresses the approval requirements to authorize company business transactions. Financial transactions may not be authorized or completed without appropriate Delegation of Authority to authorize the transaction.

Time and cost charging

All documents related to time cards or entries, expense reports, general accounting records, purchasing records or manufacturing records shall be accurate and auditable. The company's labor distribution is recorded and charged accurately and completely. Employees are never to take any action that causes mischarging of time or authorize others to take action that causes mischarging of time.

Our employees and applicable third party representatives are expected to accurately and completely record the number of hours they have worked. Incorrect time charging or other business entries violate the trust of our customers, shareowners and vendors and may also violate the law.

The accuracy of the company's books and records begins with each of us. Whether the records are time cards, expense reports, general accounting records or purchasing or manufacturing records, we each have a personal responsibility to ensure that every document is complete and accurate.

Be aware of and operate in accordance with your authority limitations in authorizing and approving business transactions, such as purchasing materials, binding the company in agreements and authorizing expenditures.

Accurately and honestly document all time card entries, vacation time, expense reports and other records.

Ensure that any time charged to a government or customer contract is accurate and timely. Time records must be entered into the proper account using the designated reporting tools.



Building trust through relationships with others

When conducting business, Rockwell Collins will uphold the company's commitment to unquestioned integrity and create a framework to build trust with customers, suppliers, shareowners and others every day. Further, business decisions must not be influenced by personal considerations or interests. Building high integrity relationships starts with a foundation of trust. Whether we are dealing with customers, suppliers, or each other, we must ensure we operate with honesty and transparency in building and maintaining these relationships.

Conflict of interests

The company requires all employees and applicable third parties to avoid any conflict, or even the appearance of a conflict, between their personal interests and the interests of the company. A conflict exists when the interests, duties, obligations or activities of an employee or an employee's family member are, or may be, in conflict or incompatible with the interests of Rockwell Collins.

Business relationships

Employees or their immediate family members may not be involved with any undisclosed business that competes or does business with the company.

Personal relationships

Employees must avoid any relationships that could adversely affect, or have the appearance of adversely affecting, their judgment or actions in performing their duties for the company. These relationships include, but are not limited to, family members with whom the employee has a direct or indirect reporting relationship or a romantic or sexual relationship with another employee with whom the employee has a direct or indirect reporting relationship.

Your role in avoiding conflict of interests

Seek guidance when you or a family member are involved in a business activity or have a personal interest that could affect or have the appearance of affecting your objectivity in performing your duties and responsibilities at Rockwell Collins. Contact the Ombudsman or Human Resources for further guidance about making a disclosure and avoiding conflicts, or even the appearance of conflicts.

You must disclose relationships such as:

- › Involvement by you or a family member with a third party that has or could have a competing interest with Rockwell Collins;
- › A work relationship with a family member or someone with whom you have a business, personal or romantic relationship who may have a direct or indirect influence on the terms and conditions of your employment or on the company's business with a customer or supplier, and;
- › Opportunities you identify through knowledge you've gained at Rockwell Collins that you wish to pursue on your own.

Failure to disclose these relationships or others that create an actual or potential conflict of interests may result in loss of business and damage to the reputation of Rockwell Collins and the employees involved. It may also result in disciplinary action, which could include the loss of employment.

Source selection

Corporate opportunity

No employee shall take for themselves any corporate opportunities that are discovered through or as a result of his or her employment with the company. Employees and their immediate family members are not to use company property, information or position for personal gain. Employees and applicable third parties have a duty to the company to advance its legitimate interests when the opportunity to do so arises.

Rockwell Collins has an obligation to its customers, vendors and shareowners to ensure that business decisions are based on quality, price, delivery, service, experience and reputation. Further, business decisions must not be influenced by outside business relationships, personal considerations or interests. Avoiding the perception of a potential conflict is as important as avoiding an actual conflict. An actual conflict of interests does not need to be present to constitute a violation of company policy.

Any conflict of interests or potential conflict of interests must be disclosed and reviewed by the company to ensure that any identified or potential conflict is avoided or addressed.

It is the policy of the company to conduct all source selection activity – both as a customer and as a supplier – in accordance with the highest Standards of Business Conduct. The company engages in competitive source selection as set forth in our procurement policy. Source selection information includes competitive information submitted as part of, or in connection with, a bid or proposal to enter into a procurement contract or for certain commercial contracts. Such information shall be treated as confidential and may be disclosed only as necessary and as required or permitted by applicable laws, regulations and company procurement policy.

Procurement

Rockwell Collins' procurement personnel have the sole authority and responsibility to procure goods and services for the company. Procurement's responsibilities include initiating requests for pricing information, receiving responses from potential suppliers and making requests to change scope, quantities, delivery schedules, terms and conditions, pricing, and specification or quality requirements. Non-procurement personnel may obtain budgetary quotes from suppliers or subcontractors for design and other planning purposes.

Procurement personnel have the responsibility to process all requests to outside firms and individuals for purchases and prices of materials, supplies and services for the conduct of business. Unless otherwise specifically permitted by other company policy or procedure,

procurement personnel are the only individuals authorized to enter into contractual relationships with consultants or suppliers and to authorize changes when necessary.

Suppliers and contractors

The company engages in business relationships with suppliers that have demonstrated the highest standards of ethics and business conduct. This expectation is defined in the Rockwell Collins Supplier Code of Conduct.

We are expected to deal fairly and honestly with customers, competitors, public agencies, suppliers or subcontractors by ensuring that no data concerning customers or competitors is obtained or solicited contrary to law or regulation, and the confidentiality of procurement information is properly maintained.

The manner in which the company selects our suppliers and the character of the suppliers we select are highly reflective of the way we conduct business. It is through these relationships that the materials and components that we use in our products extend our reputation as the most trusted source of communication and aviation electronic solutions. Further, U.S. federal law requires that certain government acquisition rules related to ethics and business conduct are flowed down to subcontractors.

Your role in source selection

Ensure you engage procurement personnel to procure any goods or services for Rockwell Collins.

Ensure you are aware of government laws and regulations if you are involved in government contracts and supplier relationships.

Hold suppliers and subcontractors responsible for delivering quality materials and components that meet product specifications. Ensure they are complying with all ethical principles and government requirements we have flowed down to them.

If you become aware that a supplier or subcontractor has violated the law, our Supplier Code of Conduct, or company policy, you are expected to report the matter to your leader, appropriate procurement or subcontracts personnel or the Ombudsman.

Your role in solicitation compliance

Ensure that your personal interests in connection with making solicitations do not represent a conflict of interests with your duties and responsibilities on behalf of the company.

Any solicitation conducted should be for nonprofit or charity purposes and not for personal profit.

Personal interests on behalf of a charitable or non-profit cause that you promote in the workplace must be appropriate and not cause discomfort or be viewed as even creating the appearance of discrimination toward your coworkers.

Solicitation

Solicitation by employees and applicable third parties at work, on company premises or while using company resources, such as email, fax machines, computers or telephones, for personal business or employee profit as well as advertising or distribution of leaflets, products or brochures is prohibited.

Employee requests for support of non-profit or charitable causes are allowed as long as they are:

- > Respectful toward other employees;
- > Voluntary;
- > Not for personal gain;
- > Do not interfere with job performance, and;
- > Are non-discriminatory and non-threatening.

Rockwell Collins strives to create a work environment that is professional but comfortable for all employees. Solicitation for personal interests or gain can make others uncomfortable and can be counterproductive to building trusted work relationships. Additionally, using company resources for personal financial gain can limit the availability of those resources for business purposes and reflect negatively on Rockwell Collins in the marketplace.

Political and lobbying expenditures and activities

U.S. law prohibits corporations from making contributions in connection with U.S. federal elections. In addition, corporate political contributions in certain states and countries are illegal, or if legal, are subject to monetary limitations and regulatory notification requirements. All Rockwell Collins political contributions are subject to prior approval by the Senior Vice President, Washington Operations after consultation with the Senior Vice President, General Counsel and Secretary and the Senior Vice President, Chief Financial Officer.

The company is required to report to the U.S. Congress, all U.S. lobbying expenditures on a quarterly basis and all U.S. federal official honoring expenditures on a semi-annual basis. U.S. lobbying expenditures include the value of time spent and costs incurred by employees in any attempt to influence U.S. federal or state legislation and similar expenditures. U.S. official honoring expenditures include expenditures made by the company as a sponsor of events intended to honor or recognize certain legislative or executive branch officials, and similar expenditures.

All employees who incur U.S. lobbying or U.S. official honoring expenditures are required to report such expenditures to the company in support of the company's obligation to report such expenditures to the U.S. Congress.

Your role in the political process

Your personal participation in the political process, including any contributions, must not conflict with your job and may not be expressed as representing Rockwell Collins.

Unlike corporations, political action committees, like the Rockwell Collins Good Government Committee, are permitted to make political contributions. Eligible employees may voluntarily participate in the Rockwell Collins Good Government Committee.

If you have any questions about which activities you may participate in with respect to the political process, you should contact the Senior Vice President, Washington Operations or the Office of the General Counsel.



Building trust through compliance with laws and regulations

It is our expectation that every employee knows, follows and respects the laws and regulations of the jurisdictions in which they work. In cases where these laws or cultural customs differ from these Standards of Business Conduct, it is expected that employees and applicable third parties will follow whichever requires the highest standard of conduct.

Compliance with laws and regulations

It is Rockwell Collins' policy that directors, officers, employees and applicable third parties conduct the company's business in compliance with all applicable local, state, federal and foreign laws. Examples of these laws include:

Global business compliance

The company complies with local country legal, tax, accounting, employment and similar requirements when locating assets, facilities or employees in each applicable country.

Anti-corruption and anti-bribery – gratuities and business courtesies

Our employees and applicable third parties must conduct business with customers (including U.S. and non-U.S. Governments) and vendors without giving or accepting anything of value that would influence or appear to influence the outcome of a transaction. It is specifically prohibited for employees of Rockwell Collins and applicable third parties to offer anything of value, directly or indirectly, to a U.S. or non-U.S. government official in order to obtain or retain business or influence an official act or decision. To comply with the law, Rockwell Collins has established

requirements for offering and receiving gratuities and business courtesies. See Appendix A at the end of this document for more details. All employees are expected to know and follow these requirements.

Export, import and anti-boycott

Company employees and applicable third parties are expected to comply with all applicable export and import rules and regulations, whenever and wherever company business is conducted. Sharing, selling, sending, receiving or otherwise transferring export controlled company products, services or technical data to or from a foreign person or entity must be done in compliance with the U.S. export and import rules and the rules of the countries in which the information is being sent and received. Employees and applicable third parties are expected to be knowledgeable about export control laws and related export policies and procedures applicable to their jobs. It is also the company's policy to comply with anti-boycott laws and other regulations prohibiting assistance in the boycott of another country.

Your role in compliance with laws and regulations

All employees must comply with applicable laws and regulations in all of the countries in which we operate.

If you are involved in the establishment of business operations, or otherwise locating assets,

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facilities or employees outside your home country, seek guidance from the International Business Controller, the Vice President, Tax or the Office of the General Counsel to ensure compliance with local country laws and rules.

Any gratuity or business courtesy, whether offered or received, shall be carefully considered to ensure that it neither represents a violation of law or our policy, nor creates the perception of impropriety. This includes meals, gratuities, entertainment or transportation you want to offer to or is being offered from a customer or supplier. If after reviewing the specific Rockwell Collins guidelines on this subject you are still unsure whether a gratuity or business courtesy should be accepted or offered, contact the Office of the General Counsel or the Ombudsman.

Understand whether the information you possess contains technical data that requires an export license or agreement before it can be shared with a foreign person. Ensure that you handle technical data with care and do not carry or transmit it to a foreign destination or to a foreign national in the U.S. without an export license or agreement. Import and export restrictions may limit your ability to accept, transmit or carry the information.

Ensure you are familiar with our Export Compliance Manual and related export policies and procedures.

Antitrust and competition

It is the company's policy and good business to obey the antitrust and competition laws of every country in which the company does business. This includes prohibition of price fixing, bid rigging, market allocations of customers or territories, monopolization or attempted monopolization, and group boycotts.

Unfair methods of competition are also prohibited, including industrial espionage, inducing a competitor's customer to breach a contract, bribery, false or disparaging comments regarding a competitor's product and misleading advertising claims. Proposed contracts or other arrangements that may be perceived to involve exclusive dealing, tying arrangements or other restrictive agreements with suppliers and customers must receive the approval of the Office of the General Counsel prior to engagement.

Insider trading

Employees and applicable third parties must not benefit from, or enable others to benefit from trading in securities or stocks based on material information not available to the general public. Company employees and applicable third parties are prohibited from trading Rockwell Collins stock or stock of

another company – such as a customer, supplier, competitor, potential acquisition or alliance – while in possession of material nonpublic information about that company.

Insider trading is illegal and consequences of insider trading can be severe, including loss of employment, substantial fines and imprisonment.

Affirmative action and equal employment opportunity

The company will employ, promote and treat employees and applicants for employment without discrimination based upon age, race, color, religion, national origin, gender, sexual orientation, physical or mental disability and veteran status or other protected classes, and will comply with all applicable employment laws.

In today's global economy, understanding the laws of the countries in which we conduct business is critical to maintaining the reputation of Rockwell Collins and our ability to conduct business in the global marketplace. Compliance with applicable laws reflects the company's commitment to conduct business with the highest level of integrity with our suppliers, competitors, customers and shareowners.

Your role in compliance with laws and regulations

You should have a general awareness of the types of business arrangements that have antitrust implications and contact the Office of the General Counsel before entering into such arrangements.

If you have material nonpublic information about Rockwell Collins or other companies due to your role with Rockwell Collins, you are prohibited from trading in those companies' securities or stock, as well as from communicating such information to family, friends or any other person.

Ensure your hiring, promotion, advancement and compensation-related decisions are made in accordance with applicable employment laws.

You should consult with Human Resources or the Office of the General Counsel if you have questions about compliance with applicable employment laws.

Compliance with government rules and regulations

The company will comply with all government rules and regulations. Company employees and applicable third parties must communicate with government representatives in an honest and ethical manner and avoid any circumstance that could be considered deceitful, fraudulent or create the appearance of impropriety or a conflict of interests.

Procurement integrity

Employees and applicable third parties are prohibited from directly or indirectly attempting to improperly obtain, receive, possess or disclose any government source selection information when there is any reason to believe that obtaining such information is prohibited by law, regulation or fair business practices. For applicable procurements of the U.S. government and non-U.S. governments, there is a ban on either obtaining or disclosing certain contractor bid or proposal information or government source selection information.

Government source selection information includes competitive information submitted to a government agency as part of, or in connection with, a bid or proposal to enter into a government procurement contract or for certain commercial contracts. This may also include nonpublic information that has been prepared for use by the procuring agency in the evaluation of a contractor's bid or proposal.

Violations of applicable laws and regulations in performing under U.S. and non-U.S. government contracts can lead to substantial fines and penalties and in severe cases, suspension or debarment from receiving government contracts.

Your role in complying with government rules and regulations

It is expected that Rockwell Collins employees will deal with government representatives in an honest and ethical manner.

Make sure you understand the laws and rules related to government procurements and any limitations on working with government customers.

Government source selection information may contain competitor proprietary information. Always exercise caution should a third party offer to provide you with bid, proposal or source selection information and pay special attention to receiving or disclosing market intelligence, which may include a competitor's price, cost data or program evaluation criteria. Other confidentiality and nondisclosure restrictions may apply.

Truth in negotiations and proposals

When conducting business with the U.S. Government, the company is obligated to comply with the Truth in Negotiations Act (TINA). Where TINA is applicable, employees and applicable third parties are expected to ensure that the company provides accurate, complete and current cost or pricing data to the government or a prime contractor when the company is a subcontractor to that prime government contractor.

Contract costs

Only costs properly chargeable to a contract may be billed to or reimbursed by the U.S. or non-U.S. government. Intentionally overbilling the company's customers is strictly prohibited.

Cost and pricing information must be accurate and complete, and billing of charges must be accurate and only for allowable costs. Improper charging of costs may arise from various causes, including false or otherwise incorrect entries on time cards, subcontractor charges, classifications of costs between direct and indirect categories, expense accounts, or charges of time or materials to a work order or other cost account.

Cost and pricing information must always be presented accurately and truthfully to the government or a prime contractor. If you are unsure, contact the program manager or Government Compliance.

When working on a government contract, make sure you understand your cost structure and how costs are charged.

Always record cost information accurately and to the appropriate cost center.

Security

All employees and applicable third parties must deal with U.S. and non-U.S. government classified and proprietary materials in the proper manner, both as a matter of national security and to assure compliance with applicable laws, regulations and government contractual requirements. Unauthorized access, dissemination, acceptance or handling of that material is strictly prohibited.

Classified information and information “For Official Use Only” must be handled in accordance with law and government rules. Employees and applicable third parties must comply with all applicable laws, regulations and contractual requirements when seeking, obtaining, soliciting or accepting classified, confidential, proprietary or competition-sensitive information prepared by or for the government or another company. Failure to do so could result in harm to national security, penalties, suspension or debarment.

Government audits and investigations

Company employees and applicable third parties shall cooperate with designated officials of the U.S. government and other countries’ governments to facilitate timely and efficient performance of audits and examinations required under a contract. All records and data must be internally approved prior to release.

Your role in complying with government rules and regulations

If you receive classified information, make sure you have been cleared to receive such information or that the information is de-classified before you view it. Information labeled as “For Official Use Only” may also be restricted and require specific permission before viewing or using it. If you are unsure, contact the Office of General Counsel or Security to obtain guidance.

It is the responsibility of every employee to cooperate fully with any investigation of any alleged violation of law or these Standards of Business Conduct. This includes all government audits and investigations.

If you are contacted by a government regarding an allegation or investigation, immediately contact the Office of the General Counsel or the Ombudsman.

Recruiting and employment of current and former government employees

The company conducts its recruiting and hiring practices of current and former U.S. and non-U.S. government employees in accordance with the laws and regulations of countries in which the company operates and in a manner that will not create the appearance of impropriety.

Rockwell Collins employees and applicable third parties are prohibited from engaging in employment discussions with certain current U.S. or non-U.S. government employees. Employment discussions must not occur until the government official has provided formal notice of desired employment discussions to his or her respective branch, department, or agency as required by that government office or our policy.

Current and former U.S. government employees are subject to federal laws and regulations that may limit the ability of the company to recruit and hire certain individuals, and may limit the activities they are able to perform for the company.

Failure to comply with government regulations and rules can lead to criminal prosecution, fines, imprisonment or suspension and debarment. Further, any inappropriate action can result in damage to the company's reputation.

Depending on the circumstances, it may be against the law for you and a current or former government employee to discuss potential employment with Rockwell Collins.

Prior to engaging in employment discussions with current or former government employees or officials, seek guidance from leadership, the Office of the General Counsel or the Ombudsman. This guidance is necessary to ensure compliance with local country laws and regulations.



Building trust through personal accountability to the company's Standards of Business Conduct

Illegal or unethical behavior is against our company's policy and can damage our reputation or ability to conduct business. At Rockwell Collins, we believe upholding our Standards of Business Conduct is everyone's responsibility and our personal conduct reflects this commitment. To that end, we've worked hard to create a culture of shared accountability, in which everyone's conduct reflects the company's ethical standards that build trust in the marketplace.

Personal conduct

Employees and applicable third parties are expected to conduct themselves in accordance with the company's Standards of Business Conduct and in a manner consistent with applicable laws and regulations. For conduct not specifically addressed by our Standards of Business Conduct, employees and applicable third parties are expected to conduct themselves with the highest standards of personal conduct.

Controlled Substances

Employees and applicable third parties are prohibited from being under the influence of, having possession of, consuming or distributing alcohol, illegal drugs or inhalants, or being intoxicated while on company business, on company property or while using company-owned or provided assets.

Additionally, employees and applicable third parties may not be under the influence of legal drugs or inhalants as prescribed by a physician as long as such use adversely affects the employee's safety or the safety of coworkers or members of the public.

Use of company resources

All use of company resources will be granted only as it is necessary for the performance of work duties. Company assets are provided for the purpose of serving the business interests of the company and may not be used for any illegal purpose, to support a personal business venture, for political purposes or any purpose that would cause embarrassment to the company. This extends to use of company-owned or provided resources when on company travel. Excessive personal or inappropriate use of company property or assets is prohibited, including storing, accessing, or transmitting offensive, derogatory, defamatory, pornographic, improper or illegal content on any company computing resource.

Employees and applicable third parties are permitted to use company assets for personal reasons if their use is not excessive or inappropriate, is not illegal, does not threaten or harass, does not impact their ability to perform their work and does not incur any expense to the company.

Your role in personal conduct

Your work, access of company facilities or use of company-owned or provided assets must never be compromised through use of or impairment by alcohol or illegal drugs.

Use of prescription drugs as prescribed by a physician is not a violation of these standards as long as such use does not impair you from conducting your job productively and safely.

Do not use company computing resources excessively or inappropriately.

Restrictions on use of company resources extend to use while on company travel, including company-provided rental cars and after work hours. Make sure your use is always appropriate and for company business, as intended.

Your role in personal conduct

Do not use company computing resources or other assets for on-line gambling or to solicit participation in gambling activities.

Theft of any amount will not be tolerated. This extends to activities such as falsifying expense reports and misrepresenting information for personal gain.

As an employee, you are responsible for your actions and words and are expected to comply with our Standards of Business Conduct while conducting company business.

Do your part in building an environment that encourages and accepts a free exchange of ideas and perspectives, fostering diversity and inclusion.

Conduct yourself in a professional manner when representing the company or presenting yourself as a representative of Rockwell Collins.

Treat coworkers, vendors, clients, customers and contractors with respect in face-to-face or electronic communication.

Gambling

Use of company assets to engage in gambling for personal gain, such as use of your company computer to participate in on-line gambling and illegal gambling activities are prohibited.

Theft

Misappropriation, larceny, embezzlement, mischarging of time and other forms of theft are strictly prohibited and are a violation of law. Any theft, regardless of relative value or damage to the company, supplier or customer, will result in severe consequences for the employee who engages in such behavior.

Unprofessional behavior

Company employees and applicable third parties are expected to conduct themselves in a professional manner, consistent with our values. Unprofessional behavior or conduct on the job or while representing the company that negatively affects the company's business interests or reputation is prohibited.



Appendix A

Gratuities and Business Courtesies

All employees are expected to comply with the approval requirements set forth in the following charts. Monetary values are provided in U.S. Dollars to ensure compliance with U.S. laws. If using a different currency, converted amount must not exceed U.S. Dollar limitations.

Offering Gratuities and Business Courtesies¹

	Members of U.S. Congress, Congressional Staff and Executive Branch Political Appointees	Other U.S. Government (USG) Employees and USG Retained Consultants	USG Prime Contractors, Subcontractors, Suppliers and RC-Retained Consultants	U.S. State and Local Government Officials and Employees	Commercial (Non-Government) Consultants, Subcontractors and Suppliers	Commercial (Non-Government) Customers	International (Non-U.S.) Government Officials
Business Meals and Receptions	Not allowed without prior approval of the Senior Vice President, Washington Operations and the General Counsel or designee.	If <\$20 per person/meal, and <\$50 in the aggregate per year, requires prior approval by Direct Supervisor. If >\$20 per person/meal or >\$50 in the aggregate per year, requires prior approval by the General Counsel or designee.	Reasonable – not extravagant or frequent ²	Not allowed without prior approval of the General Counsel or designee	Reasonable – not extravagant or frequent. ²	Reasonable – not extravagant or frequent. ²	Reasonable – not extravagant or frequent. ²
Gratuities	Not allowed.	Not allowed except for logo or promotional items ≤\$20 aggregate value per person per year.	Not allowed without prior approval of Business Unit or Shared Services Group Head, as applicable and the General Counsel or designee (except that logo or promotional items ≤\$20 aggregate value per person per year do not require such prior approval).	Not allowed without prior approval of the General Counsel or designee	Not allowed without prior approval of Business Unit or Shared Services Group Head, as applicable (except that logo or promotional items ≤\$25 aggregate value per person per year do not require such prior approval).	Reasonable – not extravagant or frequent. If aggregate value >\$100 per year, requires prior approval by Business Unit or Shared Services Group Head, as applicable.	Foreign Corrupt Practices Act and in-country laws prohibit offering certain gratuities (contact Office of the General Counsel for guidance). If legally permitted, all gratuities require prior approval by the General Counsel or designee, except for Company logo items, promotional items, or host gifts under \$50 per person per year.
Entertainment (e.g., Concert, Golf, Theme Park or Other Ticketed Event) or Transportation	Not allowed without prior approval of the Senior Vice President, Washington Operations and the General Counsel or designee.	Not allowed.	Not allowed without prior approval of Business Unit or Shared Services Group Head and the General Counsel or designee as applicable.	Not allowed without prior approval of the General Counsel or designee	Not allowed without prior approval of Business Unit or Shared Services Group Head, as applicable.	Reasonable – not extravagant or frequent.	Foreign Corrupt Practices Act prohibits certain entertainment. Also, in-country laws vary (contact Office of the General Counsel for assistance). Requires prior approval by the General Counsel or designee.

Definitions

Gratuities – Items of value – such as cash, goods, services or use of property or facilities, either given or received by an employee or representative of the company in connection with the marketing, product information, procurement, public relations or other business activities of the company, its consultants, subcontractors or suppliers, or other interested and affected parties. These items are given voluntarily and beyond the company's obligation in return for, or in anticipation of, some service or courtesy.

Business courtesies – Reasonable accommodations – such as meals, refreshments, entertainment, transportation or lodging either offered or received by an employee or representative of the company in connection with marketing, product information, procurement, public relations or other business activities of the company, its consultants, subcontractors or suppliers, or other interested and affected parties.

Gratuity and Business Courtesy Approval Requirements

The comprehensive charts following this section titled “Offering Gratuities and Business Courtesies” and “Receiving Gratuities and Business Courtesies” state the specific approvals required in regard to each of the types of gratuities and business courtesies. All employees are expected to comply with the approval requirements set forth in these charts. It may be appropriate in the case of selected businesses to establish guidelines more restrictive than those permitted by our gratuity and business courtesy policy.

Receiving Gratuities and Business Courtesies¹

	USG Prime Contractors, Subcontractors, Suppliers and RC-Retained Consultants	Commercial (Non-Government) Consultants, Subcontractors and Suppliers	Commercial (Non-Government) Customers	International (Non-U.S.) Government Officials
Business Meals and Receptions	Reasonable – not extravagant or frequent.	Reasonable – not extravagant or frequent.	Reasonable – not extravagant or frequent.	Reasonable – not extravagant or frequent.
Gratuities	Not allowed except for logo or promotional items ≤\$20 aggregate value per employee per year from a single source.	Not allowed without prior approval of Business Unit or Shared Services Group Head, as applicable (except that logo or promotional items ≤\$25 aggregate value per employee per year from a single source do not require such prior approval.)	Reasonable – not extravagant or frequent.	Varies by in-country laws. If legally permitted, all gratuities require prior approval by the General Counsel or designee.
Entertainment (e.g., Concert, Golf, Theme Park or Other Ticketed Event) or Transportation	Not allowed.	Not allowed without prior approval of Business Unit or Shared Services Group Head, as applicable.	Reasonable – not extravagant or frequent.	Varies by in-country laws. Requires approval by the General Counsel or designee.

¹Rockwell Collins employees and applicable third parties may never offer or solicit gratuities or business courtesies and may never offer or accept cash or a cash equivalent as a gratuity.

²Rockwell Collins employees are expected to inquire about and understand any prohibitions or limitations of the recipient's employer before offering any business meal. The Rockwell Collins employee involved, and his or her manager, are responsible to ensure that (a) any business meal offered complies with our gratuity and business courtesy policy, the policy of the recipient's employer and all applicable laws, and (b) such meal does not create even an appearance of having been offered as an inducement for favorable treatment and does not reflect negatively on Rockwell Collins' reputation. Employees are expected to consult with the Office of the General Counsel, as necessary, to assure compliance with applicable laws and our gratuity and business courtesy policy.



How to contact the Ombudsman

To ask a question or report a potential violation:

Ethics Line

United States toll free	1.866.224.8137
France	33 5 61717726
Germany	49 6221512492
United Kingdom	44 1189359220
U.S. Virgin Islands	1.800.224.8137
Australia	0011.800.3545.5565
Brazil	0021.800.3545.5565
China, Italy, Netherlands, New Zealand, Philippines, Switzerland	00.800.3545.5565
Hong Kong, Japan, Singapore, Thailand	001.800.3545.5565
Korea	002.800.3545.5565
South Africa	09.800.3545.5565
Mexico	001.800.3545.5565
All other locations	1.319.295.7714

email: Ombudsman@rockwellcollins.com

For general ethics information:

World Wide Web (Internet): www.rockwellcollins.com

Rockwell Collins Online (Intranet): [Rockwell Collins Online > Our Company > Ethics](#)

Building trust every day.

Rockwell Collins delivers smart communication and aviation electronics solutions to customers worldwide. Backed by a global network of service and support, we stand committed to putting technology and practical innovation to work for our customers whenever and wherever they need us. In this way, working together, we build trust. Every day.

For more information contact:

Rockwell Collins
400 Collins Road NE
Cedar Rapids, Iowa 52498
+1.1.319.295.4085
www.rockwellcollins.com

Rockwell Collins Online
[Rockwell Collins Online > Our Company > Ethics](#)

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The information contained in this document is current as of the date of hard copy print. For the most current information, please view the on-line version of this document found on the World Wide Web at: <http://rockwellcollins.com/about/ethics/index.html>, or at Rockwell Collins On-line at: [Rockwell Collins Online > Our Company > Ethics](#)

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