



ELBIT SYSTEMS SUPPLIER CODE OF CONDUCT

1. Introduction

Welcome to Elbit Systems Ltd.'s ("ESL") and our wholly owned subsidiaries (collectively "us" or the "Company") *Supplier Code of Conduct* ("Code").

Conducting our business honestly, ethically and properly is critical to the Company's continued success. The purpose of this Code is to support and enforce the commitment of our suppliers, offset / industrial collaboration business partners, contractors, subcontractors, consultants and other business partners (collectively "Suppliers" or "Supply Chain") to ethical and compliant business conduct.

In addition to the specific provisions of the Code and any other Company policies, procedures, or contractual obligations we may ask you to follow, we expect members of our Supply Chain to conduct their business activities ethically and in compliance with all laws and regulations. This Code is intended to promote a culture that complies with not only the letter, but also the spirit of Company policies and market best practices.

This Code is based upon the Company's *Code of Ethics and Compliance* and its supportive and implementation procedures and policies, available for review on our website, www.elbitsystems.com under "Global Footprint - Ethics & Conduct".

While the Code contains standards to be followed, no one document can cover all situations and in the absence of a specific provision addressing explicit circumstances, we expect you to act reasonably and ethically.

2. Conducting Your Business

We require our Suppliers to maintain ethical and transparent conduct in all business dealings not only with the Company, but in any interactions with third parties.

The Company's reputation is based on delivering systems and products that create value for our customers. In order to maintain this reputation, and our business integrity, we strive for excellence in all that we do, including conducting ourselves according to recognized international standards. We expect our Supply Chain to follow ethical and compliance practices similar to our own.

You should refer to this Code's principles when ethical and compliance issues arise. Each of the principles in this Code is fundamental to how we do business.

3. Compliance with Laws

You must comply with all applicable laws and regulations of the countries in which operations are managed or services provided.



If, for whatever reason, following the Code would conflict with a legal requirement, you must comply with the law.

4. Security Policies

We are a global defense company, and therefore subject to defense and homeland security laws and regulations and to specific guidelines dictated by governmental authorities and our security department. We are dedicated to upholding the highest standards of security to protect our assets, information, facilities, IT systems and personnel. Recruitment and business

relations are also subject to applicable standards of security clearance.

As a member of our Supply Chain, you must therefore adhere to applicable security related laws and security guidelines provided to you addressing the nature of our collaboration and your scope of work, with special emphasis and measures relating to classified and export-controlled information and items.

5. Human Rights

Our Supply Chain is expected to treat people with dignity, mutual respect, remain receptive to diverse opinions, promote equal opportunity for all and foster an inclusive and ethical culture, in accordance with the relevant International Labor Organization (ILO) Conventions and ESL's Human Rights Policy. Suppliers must refrain from violating the rights of others and address any adverse human rights impacts of their operations.

1) Child Labor

Suppliers must ensure that child labor is not used in the performance of work and ensure age-appropriate employment that does not deprives children of their childhood, potential and dignity. The term "child" refers to any person under the minimum legal age for employment where the work is performed provided the legal age is consistent with the minimum working ages defined by the ILO.

2) Human Trafficking

We fully support the elimination of human trafficking and slavery from the Supply Chain and do not tolerate any trafficking in persons. Suppliers must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which activities are undertaken as well as those relevant to the collaboration with us and the requirements of our customers.

3) Forced Labor, Modern Slavery and Indentured Labor

As part of our Supply Chain, you are committing to the prevention of forced labor, modern slavery and prohibition of forced labor in any form. This encompasses a commitment to refrain from benefiting from the outcomes of items acquired and work performed involuntarily and under the menace of any penalty, using violence or



intimidation, or by more subtle means such as manipulated debt, retention of identity papers, or threats of denunciation to immigration authorities.

6. Employment Practices

1) Harassment

Suppliers are expected to take measures to ensure that their employees and other parties working under their responsibility are afforded an employment environment that is safe, free from physical, sexual, psychological and verbal harassment, work-place bullying or other abusive conduct.

2) Non-discrimination

Suppliers must provide their existing and prospective employees with equal opportunity without regard to protected characteristics, such as race, color, sex, age, disability or sexual orientation.

Employment practices should include equal remuneration for work of equal value for men and women.

3) Wage and Benefits

Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. Deduction from wages as a disciplinary measure should be applied in accordance with relevant domestic laws and regulations.

4) Free Association

Suppliers are expected to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

7. Anti-Bribery and Corruption

1) Anti-Bribery and Corruption Laws and Regulations

Suppliers must comply with the anti-bribery and corruption laws, directives and regulations that govern operations in the countries in which business is conducted. When doing business with us, this also includes compliance with Organization for Economic Co-operation and Development ("**OECD**") Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the U.N. Convention Against Corruption, the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.



In any business relationship, Suppliers must ensure that: (i) the offering or receipt of any gift or business courtesy is permitted by law and regulation, and (ii) these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practice.

Note that although standard give-away items with a nominal value may sometimes be permitted in appropriate situations, government agencies and companies have regulations prohibiting their employees' acceptance of items of value from contractors or suppliers.

2) Zero Tolerance Policy

The Company has a "zero tolerance" policy against bribery and corruption, by Suppliers or via our Supply Chain, whether done directly or indirectly and whether with respect to activities performed for the Company or Supplier's collaboration with other third parties.

3) Illegal and Improper Payments or Benefits

Doing business the right way, means never providing or receiving anything of value to obtain a business advantage or favorable treatment or exerting undue influence, including offering, giving, asking for or taking any form of bribe or kickback. This extends to payments and gifts of cash or in-kind, made directly or through others.

Additionally, facilitating payments intended to expedite or secure performance of a routine governmental action for Company's benefit, such obtaining a visa or customs clearance, are prohibited even in locations where such activity may not violate local law.

4) Gifts/Business Courtesies

The Company and our Supply Chain compete solely on the merits of our products and services. Suppliers should not try to influence a business decision or otherwise gain an unfair competitive advantage by offering gifts, meals, travel expenses, entertainment, employment or other business courtesies.

5) Offers of Employment

Offers of employment to employees or representatives of our customers or end users, or their close relatives, could be viewed as an attempt to improperly influence decisions relating to our business. Therefore, Suppliers are expected to exercise caution in hiring activities to avoid the possibility or perception of undue influence.

6) Fraud and Deception

Our Supply Chain must avoid gaining any advantage of any kind by acting fraudulently, deceitfully, making false claims, or allowing anyone else to do so. This includes defrauding or stealing from the Company, a customer or any third party, and any kind of theft, embezzlement, fraud or misappropriation of property.



8. Competition and Anti-Trust

We compete fairly and within the law. As such, our Suppliers should comply with applicable competition and anti-trust laws of the relevant territories applicable to their activities. These laws prohibit formal or informal understandings, agreements or arrangements that unfairly and unlawfully restrict competition such as price fixing, exchange of pricing information, bid rigging or participation in cartels.

9. Insider Trading

ESL is a publicly listed company with securities traded on the Tel Aviv Stock Exchange and on the Nasdaq. Non-public information, disclosed or obtained in the course of doing business with the Company may be deemed information that is subject to insider trading restrictions. Therefore, Suppliers must refrain and ensure their representatives undertake to refrain, from making any use of such information that would constitute a violation of U.S and Israeli securities laws relating to use of inside information. Use (including disclosure) of inside information by the Supplier, its employees or anyone associated with the Supplier, may be considered a violation of insider trading provisions under U.S and Israeli securities laws and/or any other applicable law.

10. Conflicts of Interest

1) General

Suppliers are expected to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest and provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of the Company and the Supplier or its employees' personal interests or the interests of Supplier's employees' close relatives, friends or associates.

Such conflict of interest may include having a personal relationship with a Company employee involved in purchasing decisions, owning shares in a competing company, or entertaining a job offer to any of our employees or their relatives or associates.

When doing business with us, we expect our Suppliers to timely notify the Company of any potential conflicts of interests that may have an impact on our collaboration.

2) Offers of Gifts and Entertainment to Our Employees

According to our Code of Ethics and Compliance, our employees are generally prohibited from accepting items of value, gifts and entertainment, personal benefits and participation in Suppliers' external activities and Supplier's promotional events.

Therefore, if offering such business courtesies, you must ensure that the offering or receipt of any gift or business courtesy is of a standard give-away, reasonable and of nominal value and in accordance with our Company's policies. Cash and cash equivalents (such as vouchers and gift cards) are prohibited.



Gifts of significant value that may influence a decision or may be perceived to influence a decision concerning potential and existing business with you are therefore strictly prohibited.

11. Maintain Accurate Records

You are expected to keep appropriate records to demonstrate compliance with this Code, as well as all applicable laws and regulations. This includes creating accurate records and not altering any record entry to conceal or misrepresent the underlying transaction represented by such records. Regardless of format, all records made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on applicable legal document retention requirements.

12. Information Protection

The Company is committed to ensuring that all our privacy-protected information, commercially sensitive, confidential and proprietary information as well as information of our customers and business partners is protected to the full extent required by the law and our contractual commitments.

Therefore, our Suppliers must protect the sensitive, confidential and proprietary information of our Company and those of customers and business partners from unauthorized access, destruction, use, and disclosure through appropriate means and comply with all the applicable laws and contractual requirements governing the parties' collaboration. Unauthorized use or distribution of proprietary information, classified information or private / personal information through any means, including social media, AI tools etc., violates this Code and may also violate applicable law, as well as regulatory and contractual requirements.

Proprietary Information includes trade secrets, intellectual property, trademarks, copyrights, business, marketing, financial, human resources, technical and administrative information not released to the public. You must safeguard proprietary information of the Company or third-party proprietary information provided by the Company. It cannot be shared with a third party without the Company's express written permission.

Classified Information includes data and items that for reasons of national security must be safeguarded and maintained in accordance with applicable laws and regulations in support of a government program. To receive this information your facility must possess the appropriate government-approved security clearance. It is important to remember that release of classified information to unauthorized persons is prohibited and poses a risk to national security.

Private / Personal Information: In the event of possession of information which qualifies as "Personal Data" under applicable privacy and data protection legislation, you commit to comply with the relevant provisions of applicable data protection legislation and with the relevant guidelines and instructions as provided by us.



13. Cyber Security

The Company expects its Suppliers to follow and understand the cybersecurity landscape and mitigate the emerging risk of information systems by implementing appropriate IT cybersecurity protocols. This includes taking the necessary information security measures, for both computer systems and portable electronic devices, to protect against malware and unauthorized access and disclosure of any information provided, developed or acquired by the Supplier in connection the parties' collaboration. When collaborating with us, the Supplier must comply with our cybersecurity requirements.

If there is a suspicion that a possible data security breach involving data of the Company and/or its customers or business partners has occurred, Supplier must immediately report such breach to the Company and strictly comply with our cyber security protocol and instructions.

14. Publications and Interactions with the Media

As a public Company, the Company is subject to applicable securities laws of the U.S. and Israel which regulate the disclosure of information concerning the Company. The Company controls the release of its publicity, press releases or media interviews that include a reference to the Company, our affiliated companies, our customers, our end users or our cooperative activities with you.

Suppliers should not publish (including on different social media platforms), discuss or disclose information relating to the Company or their activities with the Company, without obtaining Company's prior approval.

15. Environment, Health, and Safety

As a global company, we are committed to comply with local and global EHS regulations and leading EHS standards in our operations and expect our Supply Chain to support these efforts and implement environmental sustainability priorities so that we can improve the processes and systems throughout their lifecycle to protect the environment.

Additionally, we require our Suppliers to provide information required to support our strategy and reporting obligations.

1) Environmental, Health and Safety Management

Suppliers must comply with all applicable environmental, health and workplace safety laws and regulations. Suppliers are also expected to take all measures to prevent contamination, pollution and negatively impacting natural resources and establish an appropriate management system for environmental, health and safety compliance.

2) Sustainability; Conservation of Natural Resources

Suppliers are expected to operate in a manner that actively manages risk, conserves natural resources and protects the environment in the communities within which Suppliers operate.



3) Protection of Workplace Health and Safety

Suppliers are expected to provide and protect the health, safety and welfare of their employees, contractors, visitors and others who may be affected by their activities.

16. Global Trade Compliance, Sanctions, and Export Controls

Suppliers must comply with all international embargoes and observe international sanctions imposed by the United States, European Union, United Kingdom, United Nations and domestic sanctions. This includes restrictions on transactions with certain countries, entities, and individuals.

Suppliers must also ensure that their business practices are in accordance with all applicable laws, directives and regulations governing the import and export (including re-export) of parts, components, technical data, software and services.

Truthful and accurate information relating to import and export authorization processes should be provided in the processes of handling import and export licenses and/or approvals.

In the event of a violation or suspected violation of the law or relevant export-control regulations, Supplier should immediately inform the Company of the circumstances pertaining to the potential violation, and cooperate where applicable, with the Company's Trade Compliance representative.

17. Responsible Sourcing of Minerals

Our policy is to use "conflict free" tin, tantalum, tungsten, and gold ("**3TG**") in our products, and we support industry actions to increase Supply Chain transparency to facilitate the ability of companies to source conflict free 3TG. Our Reasonable Country of Origin Inquiry (RCOI) activities and other 3TG-related activities are consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the related Supplements for gold and for tin, tantalum and tungsten, and we comply with Rule 13p-1 (under the Securities Exchange Act of 1934). Suppliers are required to provide information requested by the Company to enable us to timely comply with all our due diligence, on the source and chain of custody of these minerals and require the same from their next tier suppliers.

18. Counterfeit Parts

Suppliers are expected to purchase authentic materials/components directly from the original manufacturers or through the authorized or franchised distributors. In addition, Suppliers should implement and maintain effective methods and processes appropriate to your products to minimize the risk of introducing counterfeit parts and materials into products to be delivered to us. Notification is expected in the event of counterfeit product(s) or components if such were supplied to us, so that we can exclude them from the product delivered to our customers.



19. Government Procurement

1) Compliance with Government Contracting Regulations

Governments are the largest user of the Company's goods and services, so it is crucial that our Supply Chain is compliant with the laws and regulations relating to government contracting in the countries in which they are supporting our projects.

In working with the Company in any government procurement process, Suppliers will not improperly obtain, use, disclose or request government internal information regarding to the procurement procedures or proprietary information.

2) Marketing, Representation and Lobbying on Company's Behalf

Suppliers are not authorized, directly or through others, to engage in marketing, representation or lobbying activities designed to influence government policies, or the award or administration of government contracts, on our behalf or on behalf of our projects, without our prior approval and authorization.

20. Suppliers' Ethics and Compliance Program Expectations

1) Ethics and Compliance Policies

Commensurate with the size and nature of your business, you are expected to establish management systems to support compliance with laws and regulations, as well as with the expectations expressed within this Code. You are encouraged to implement your own written code of conduct and to flow-down those principles to your supply chain and entities that furnish you with goods and services. We expect you to maintain effective programs to encourage your employees to make ethical, value-driven choices in your business dealings - beyond compliance with laws, regulations and contract requirements.

2) Whistleblower Protection and Non-Retaliation

Suppliers should provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. Suppliers should also take action to prevent, detect, and correct any retaliatory actions. Reporting concerns may be reported to the Supplier's relevant Company's "focal point" or to the channels detailed in Clause 24 below.

21. Suppliers Accountability for their Business Partners

Our Suppliers are expected to flow-down the principles of this Code, to their business partners and their suppliers, involved in our business activities and to ensure compliance by undertaking auditing, and oversight to prevent and detect misconduct.

We expect our Supply Chain to exert reasonable due diligence to prevent and detect corruption, sanctioned parties,



money-laundering issues, human rights abuses and fraud in all business arrangements, including partnerships, joint ventures, offset / industrial collaboration agreements and the hiring of intermediaries such as agents or consultants.

22. Due Diligence – Provision of Information

The Company may conduct due diligence on Suppliers and business partners depending on the nature of the engagement and scope of collaboration. Suppliers are expected to cooperate with us by providing the requested information and replying truthfully and candidly to questions and requests for clarifications if applicable.

23. Right to Audit

We reserve the right to periodically review our Suppliers' business practices and applicable records to ensure compliance with contractual undertakings, legal requirements and this Code. Suppliers are therefore expected to comply with our reasonable inquiries related to the work performed for us and cooperate with audits and investigations, including permitting us and/or our representatives to assess compliance with the expectations set forth in this Code. Such assessments may include on-site inspection of facilities and review of associated books, records and other documentation.

24. Reporting Concerns

1) Self-Monitoring and Reporting

Suppliers are expected to self-monitor and align their compliance principles with this Code, and promptly report any integrity concern involving or affecting the Company, whether or not the concern involves the Supplier. The Company will accept reports, complaints and concerns raised anonymously.

When requested, Suppliers are expected to assist the Company in investigating concerns.

2) Reporting Point of Contact

Prompt reporting is crucial and therefore we expect our Supply Chain to report any concerns by contacting the Company's representatives via the following channels:

Reporting Channels

Corporate Legal Department

Chief Legal Officer / Chief Ethics Officer / Chief Anti-Bribery and Corruption Officer

Telephone: +972 (077) 2947755

Email: legal.ethics.compliance@elbitsystems.com

supplychaincompliance@elbitsystems.com

Address: Advanced Technology Center, POB 539, Haifa 3100401 Israel



Chair of Audit Committee of the Board of Directors

Advanced Technology Center, POB 539, Attn: Chair of the Audit Committee, Board of Directors at Elbit Systems Ltd. Haifa, 3100401 Israel.

Email : auditcommittee.elbit@gmail.com

All reports of violations will be promptly and efficiently investigated and, if found to be accurate, acted upon in a timely manner.

3) External Reporting

Nothing in this Code, or any contractual undertaking with the Company and its employees prohibits, conflicts or restricts the Supplier from communicating, cooperating, or filing a complaint with, or making disclosures or a report to, any governmental or law enforcement branch, agency or entity with respect to possible violations of any law or regulation.

4) Non-Retaliation Policy

We strictly prohibit retaliation against anyone who, in good faith, raises an ethical concern, reports a possible violation, or cooperates with a Company's investigation into a concern.

25. Additional Relevant Company's Policies

The Company publishes and updates from time to time, policies and procedures that may be applicable to this Code. These policies are publicly accessible on our website www.elbitsystems.com.

We strongly encourage our Supply Chain to familiarize themselves with these policies:

- *Anti-Bribery and Corruption Compliance Policy;*
- *Whistleblower and Investigations Procedure;*
- *Procedure on Anti-Bribery and Corruption Due Diligence;*
- *Business Entertainment and Gifts Policy;*
- *Supplier Code of Conduct;*
- *Human Rights Statement and Company's Policy;*
- *Insider Trading Policy;*
- *Conflict Minerals Compliance Policy and Conflict Minerals Report*

26. Applicability of this Code

This Code of Conduct is automatically applied and embedded into any contractual relationship between the Company and the Supplier. By entering into a contract or purchase order with the Company, the Supplier agrees to accept and adhere to the principles and guidelines outlined in this Code, and commits to the principles set out herein for all existing contracts (if any), and for all business and contractual relationship with Elbit.



This Suppliers Code of Conduct represents a minimum standard of best practices. It shall be governed by the law of the contract or purchase order (if any).

In the event there is no contract or purchase order, this document shall be governed by the laws of Israel.

In the event that the expectations of this Code are not met, the business relationship may be reviewed, and corrective action will be pursued subject to the terms of the related procurement contracts.