

Code of Conduct

Elbit Systems Germany GmbH & Co KG

1. General principles

Elbit Systems Deutschland GmbH & Co. KG (hereinafter referred to as "Elbit") aligns its business actions and decisions with generally applicable ethical values, in particular integrity, credibility and respect for human dignity. Elbit promotes transparency, responsible management and control in the company in an appropriate manner.

Elbit conducts its business in accordance with the laws and official rules of the countries in which Elbit operates, as well as in accordance with the principles laid down herein, which must be observed by all employees at all hierarchical levels as well as the governing bodies without exception. Unfair or even illegal practices are not compatible with these business principles. In particular, any kind of bribery and corruption is prohibited.

All business records must be in accordance with the law and the company's own policies. Business records must be created, maintained and stored correctly and securely. This applies regardless of whether the reports are internal or external.

Care must also be taken to ensure that records cannot be subsequently altered to conceal or misrepresent the underlying transaction they reflect, if necessary. There must be no assets that are not recorded in the accounts.

2. Conduct towards customers, competitors, business partners and third parties

Elbit respects the rules of fair and open competition and does not enter into any agreements that influence competition in an improper manner.

Company employees must not engage in formal or informal anti-competitive agreements that fix or coordinate prices, manipulate bidding processes, limit supply or divide or control markets. They must not exchange current, recent or future price information with competitors.

If a contract is awarded on the basis of a formal and public invitation to tender, Elbit will neither discuss nor coordinate offers - outside of a bidding consortium - with other bidders.

Elbit expressly opposes any form of corruption at home or abroad and already avoids the appearance of trying to influence business decisions through unfair business practices.

No employee may exploit the company's business connections for his or her own benefit or to the detriment of the company. This means in particular that no employee grants or accepts unauthorised private benefits (e.g. money, material assets, services) in business dealings that are likely to influence an informed decision. This also applies to regions where such activities may not violate the laws applicable there.

Invitations, such as to business meals or events, which are in accordance with recognised business practices and appropriate, may be extended and accepted if they do not serve the purpose of undue favouritism.

Employees must not offer, promise, make or accept, or agree to accept, payments of money or anything of value to government officials, political parties, candidates for public office or any

other person. This also applies to the prohibition of so-called "facilitation payments" intended to expedite or ensure the performance of a routine official action. Payments for the personal safety of an employee are permitted if there is an imminent risk to the health or safety of the employee.

The engagement of consultants, agents and other contract intermediaries must not be used to circumvent the prohibition of bribery.

Donations are made only on a voluntary basis and without expectation of anything in return. Donations and sponsorships must not be designed to covertly promote decisions in the interest of Elbit. Remuneration similar to donations is prohibited. This is understood to mean benefits that appear to be granted as remuneration for a service, but whose value significantly exceeds the value of the service.

Elbit does not tolerate money laundering. All employees are required to strictly comply with anti-money laundering laws. They must also immediately report any suspicious payment information or other transactions that may indicate money laundering to the management.

Employees involved in the import or export of goods, services or technical information must know and comply with the relevant laws, directives and regulations. This also includes any existing economic sanctions and embargoes. Furthermore, they must ensure that they have complete import or export documents. If the export of products and technical data is regulated in the country concerned, employees must obtain the appropriate licences and other government approvals before exporting.

3. Suppliers and supply chain

Elbit expects its suppliers to comply with the guiding values of this Code of Conduct and encourages them to adopt the same content in relation to their own supply chain.

Suppliers must not attempt to gain an advantage of any kind by acting fraudulently, deceiving others, making false claims or allowing another person representing them to do so. Suppliers shall not engage in cartels or activities that would unlawfully restrict or impair competition.

As soon as Suppliers become aware of or have sufficient reason to believe that they themselves or one of their sub-suppliers in the supply chain are in breach of this Code of Conduct or its own Code, Elbit must be informed immediately in writing. This duty to inform shall apply in particular in the event that official investigations or legal proceedings are initiated against the Supplier or one of its sub-suppliers and at least one of the reasons for this can be found in the non-compliance with standards from this or a comparable Code.

For evaluation purposes, Elbit may require its Suppliers to fill out a suitable self-disclosure form or to update the same.

4. Avoidance of conflicts of interest

Elbit expects loyalty from its employees. All employees are obliged to avoid any situation from which a conflict may arise between their personal interests and the interests of Elbit. A conflict of interest may arise when an employee takes actions or pursues interests that may make it difficult to objectively and effectively perform his or her duties and discharge his or her responsibilities to Elbit. This also includes a conflict between the interests of Elbit and the personal interests of close relatives, friends or acquaintances of the employee.

The relationships of Elbit and its employees and their business partners must be characterised by transparency, especially in purchasing and sales. This also applies to relationships with former employees and in particular with relatives of employees who directly or indirectly supply Elbit with goods or services.

5. Dealing with information

Elbit's employees are obliged to maintain strict confidentiality about company and business secrets and other internal matters. This shall apply accordingly to information about contractual partners and customers that is not publicly accessible. The duty of confidentiality shall continue to apply after termination of the employment relationship.

A significant asset of Elbit is its intellectual property. This includes, in particular, patents, trademark rights and rights of use protected by copyright. It is Elbit's corporate policy to establish, responsibly use, preserve, protect and defend all rights to commercially significant intellectual property. Elbit respects the intellectual property of other natural persons and legal entities and uses the corresponding information or processes exclusively in accordance with the respective licence agreements or within the scope of legal requirements.

In addition to the general confidentiality regulations, data secrecy in accordance with the German regulation about the protection of personal data („Datenschutzgrundverordnung“) must be observed. Personal data is only collected, processed and used insofar as this is permitted by law, serves legitimate purposes and is necessary for the fulfilment of tasks. All employees must handle and protect personal data in accordance with the applicable laws.

Elbit uses security and safety measures of technical and organisational nature in order to protect personal data against manipulation, loss, destruction or against access by unauthorised third parties. These security measures are continuously adapted and improved in line with the latest developments.

6. Principles of social and environmental responsibility

Social responsibility is an indispensable component of value-based corporate governance and an essential factor for sustainable corporate success.

Elbit respects and supports internationally recognised human rights.

In this context, Elbit is also in constant dialogue with its suppliers to avoid that its products contain raw materials and minerals from conflict regions. Elbit expects its suppliers to conduct appropriate due diligence and to provide supporting information on their sources and supply chain for raw materials and minerals upon request. If the supply chain of the material supplied is "indeterminable" or otherwise unknown, the supplier is expected to either obtain the appropriate certifications or phase out the material.

The prohibition of child labour is respected. The term "child" includes all persons under the age of 15 years or the minimum employment age set by the International Labour Organisation (ILO) in the country where the work is performed, whichever is higher.

The prohibition of all forms of modern-day slavery, including human trafficking, forced labour, indentured servitude or servitude, shall be observed.

Discrimination against employees and third parties will not be tolerated by Elbit. Elbit firmly opposes unacceptable treatment of employees, in particular sexual and/or verbal harassment.

Elbit promotes equal opportunities for its employees.

Elbit recognises the freedom of association and freedom of assembly of its employees. Elbit observes the applicable laws and labour standards with regard to appropriate remuneration and maximum working hours. This naturally includes compliance with all provisions of the law regulating a general minimum wage in Germany. Elbit ensures fair working conditions overall.

Elbit has established measures to protect the health, safety and welfare of employees, clients, contractors, visitors and other persons who may be affected by its activities. Occupational health and safety is ensured within the framework of legal requirements.

Sustainable environmental and climate protection as well as resource efficiency are important corporate goals for Elbit. Both in the development of products and in the operation of production facilities, Elbit takes care to minimise any impact on the environment and the climate. Elbit expects its suppliers to improve the efficiency of their energy and water consumption and use of natural resources, to minimise hazardous waste, to ship goods in appropriate external packaging, to promote reusable/recycled packaging materials and to manage their air emissions responsibly.

Elbit appeals to the responsibility of its employees to treat natural resources with care and to contribute to the protection of the environment and climate through their individual behaviour.

7. Compliance with the Code of Conduct

Elbit shall familiarise its employees with the contents regulated in this Code of Conduct and explain the obligations resulting therefrom. Elbit communicates the principles of the Code of Conduct to its business partners.

The behavioural requirements set out in this Code of Conduct are binding on the company's employees as part of their employment contract and must therefore be complied with.

Elbit takes all necessary steps to enforce the core values and guidelines contained in this Code of Conduct through appropriate organisational measures as well as processes in all business areas.

Ulm, July 2022