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MarathonNorco Aerospace’s Policy Statement on Conflict Minerals

MarathonNorco Aerospace (“MarathonNorco”) is committed to complying with the requirements regarding the use of “Conflict Minerals” under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, and the related rules and regulations issued by the U.S. Securities and Exchange Commission (“SEC”).

The rules and regulations require us to determine the extent to which our products contain Conflict Minerals originating from the Democratic Republic of the Congo and certain adjoining countries (“Covered Countries”) by analyzing the products we manufacture and the raw materials and components we purchase—through supply chain due diligence if Conflict Minerals are sourced from the Covered Countries. “Conflict Minerals” is currently defined as tin (cassiterite), tungsten (wolframite), tantalum (columbite-tantalite or coltan) and gold. The purpose of these rules and regulations is to reduce the funding of armed groups engaged in conflict and human rights abuses.

Conflict Minerals reporting via Form SD is due to the SEC on May 31 of each year for the prior calendar year.

In order to comply with the applicable rules and regulations, MarathonNorco (through TransDigm Group, Inc.) commits to:

- Attempt to identify the presence of Conflict Minerals in our supply chain that are necessary to the functionality or production of our products.
- Develop processes to determine whether Conflict Minerals in our supply chain originate from Covered Countries or are derived from recycled or scrap sources.
- If necessary, perform supply chain due diligence in accordance with the OECD due diligence framework, or other similar standard.
- Inform our suppliers of the SEC reporting requirements related to Conflict Minerals.
- Prepare an appropriate disclosure for MarathonNorco’s required SEC filings on Conflict Minerals.

In addition to the foregoing commitments, we expect our suppliers to perform similar due diligence on the sources of Conflict Minerals in their supply chains and make their findings available to us.