

# Code of Conduct

Act with Integrity



COLLINS AEROSPACE | PRATT & WHITNEY | RAYTHEON

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# A message from the chairman and CEO

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Dear colleagues,

At RTX, we play a critical role in helping connect people through commercial aviation and in defending democracy across the globe. Our customers rely on our unmatched portfolio and talented global workforce each and every day to tackle the world's hardest challenges.

**In delivering on our mission, it's vital that we remain grounded in our RTX values.**

Safety, Trust, Respect, Accountability, Collaboration and Innovation – these are not just words. They are the values we work by, providing a core set of principles and shared imperatives that serve as the foundation for our RTX Code of Conduct and a guide for how we engage with our customers, our other third-party stakeholders, and our coworkers.

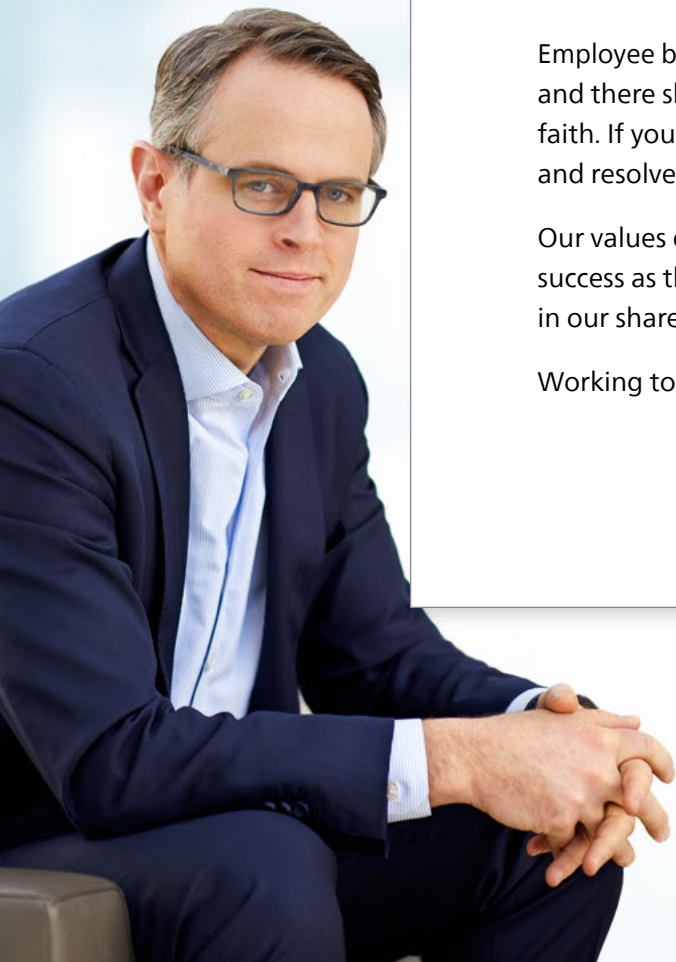
We all have a responsibility to drive a strong ethical culture to ensure that RTX is a trusted partner in the marketplace, and a great place for our employees to feel seen, valued, respected and protected. We must hold ourselves and our teams accountable to living our values through our actions and behaviors, as outlined in our Code of Conduct.

Employee behavior that runs counter to our values will not be tolerated, and there should never be any hesitation in raising a concern in good faith. If you see something, say something. All issues will be addressed and resolved appropriately, with zero tolerance for any retaliation.

Our values define what it means to be a member of the RTX team. RTX's success as the world's premier aerospace and defense company is rooted in our shared commitment to doing the right thing – always.

Working together, we will help create a safer, more connected world.

Chris Calio



# Our values

## Creating the future we want

At RTX, our values of safety, trust, respect, accountability, collaboration, and innovation guide our actions and decisions. These values help us focus on what is important and create the future we want, fostering a cohesive and supportive organization.

## Filling the gaps between the rules

We follow global laws, regulations, and internal policies while upholding integrity. When rules are unclear, our values fill the gaps to guide our choices and conduct.

## Can versus should

Just because we can do something doesn't mean we should. Our values challenge us to always consider the right thing to do, ensuring integrity in our actions toward each other, our company, our customers, and our communities.



### Values



#### Safety

We prioritize safety in every aspect of our work.



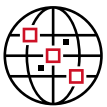
#### Trust

We act with integrity and do the right thing.



#### Respect

We embrace diverse perspectives and treat others the way they want to be treated.



#### Accountability

We honor our commitments, expect excellence and take pride in our work.



#### Collaboration

We share insights, learn together and perform as a team.



#### Innovation

We experiment, design, build and transform with speed and agility.

# About our Code

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## Why it matters

Our Code of Conduct, "Act with Integrity," guides us to perform our best individually and collectively. It promotes ethical decision-making and helps build a strong culture of compliance to achieve our business goals with integrity.

## Who the Code is for

The Code applies to all employees, officers, directors, and certain business partners. Everyone is expected to follow the Code, and violations can lead to disciplinary action, including termination.

## Our decision process

This Code helps us act compliantly and ethically, but it doesn't cover all situations. When facing a dilemma, we use our best judgment and:

- **Involve the right people:** Ensure different viewpoints are considered for informed decisions.
- **Ask: "Can we do it?"** Ensure compliance with laws and policies.
- **Ask: "Should we do it?"** Ensure actions foster trust, respect, and integrity.
- **Ask: "How best can we do it?"** Consider impacts for improving our culture with every decision.



## Our responsibilities

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At RTX, we succeed together with colleagues, customers, and partners. We each are responsible for doing the right thing.

We must:

- Understand and comply with the Code, RTX values and company policies.
- Follow all applicable laws and regulations.
- Keep commitments and lead by example.
- Seek guidance from and report concerns to a member of the Ethics & Compliance team to ensure that we act ethically and compliantly at all times.
- Cooperate with investigations.
- Never retaliate against those who raise concerns in good faith.

### Special responsibilities for leaders

Leaders and supervisors must:

- Regularly communicate the importance of the Code, our values and policies.
- Lead by example and promote a positive work environment, recognizing that perception matters.
- Emphasize that the means are always as important as the ends.
- Listen to our employees and address questions and concerns promptly.
- Never ask others to violate the law, the Code or the RTX values.
- Support ethics and compliance initiatives.
- Never engage in or tolerate retaliation.



# Keeping everyone safe and well

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Nothing is more important to us than safety, the first of our core values. This includes the safety of our products, of those who use them and of every person in and around our workplaces. We never compromise on the safety, quality or excellence of our products and services. We also create a working environment where all employees feel safe to raise concerns and confident to speak up.

## Why it matters

Ensuring our products are safe and work as designed helps us maintain our reputation, paving the way for future competitions. With lives at stake, we embrace our responsibility by having the confidence to speak up when we see something that concerns us and by applying a mission-assurance mindset in our daily work.

## How we make it happen

We ensure safety and well-being by:

- Following safety guidelines, policies, and laws.
- Reporting injuries, hazards, and near misses promptly.
- Looking out for each other and promoting safe work practices.
- Creating a work environment where all employees feel confident speaking up and know they are being heard.
- Encouraging healthier choices for physical and psychological well-being.
- Prohibiting illegal drugs or other controlled substances, alcohol, weapons, and violence in the workplace.

Delivering safe, high-quality products and services means that we:

- Prioritize safety, quality and excellence in all design, sourcing, manufacturing, delivery, installation, maintenance, and repair.
- Meet or exceed government regulations and industry standards.
- Contact customers for any required contract changes.
- Prevent the use of counterfeit parts and ensure conformity.
- Complete all inspections and testing accurately and on time.

We expect leaders to empower employees to raise safety or quality concerns, even if it halts production, and to foster a culture of continuous improvement.



# Treating each other with respect

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We listen and treat each other with respect and compassion to promote a positive work environment, where we can all feel empowered to give our best effort.

## Why it matters

We serve each other and customers best by actively listening and communicating respectfully. Considering others' perspectives builds trust and avoids misunderstandings. Speaking up about inappropriate behavior helps prevent anyone from feeling disrespected or intimidated, creating a supportive work environment that empowers excellence.

## How we make it happen

Treating each other with respect means we:

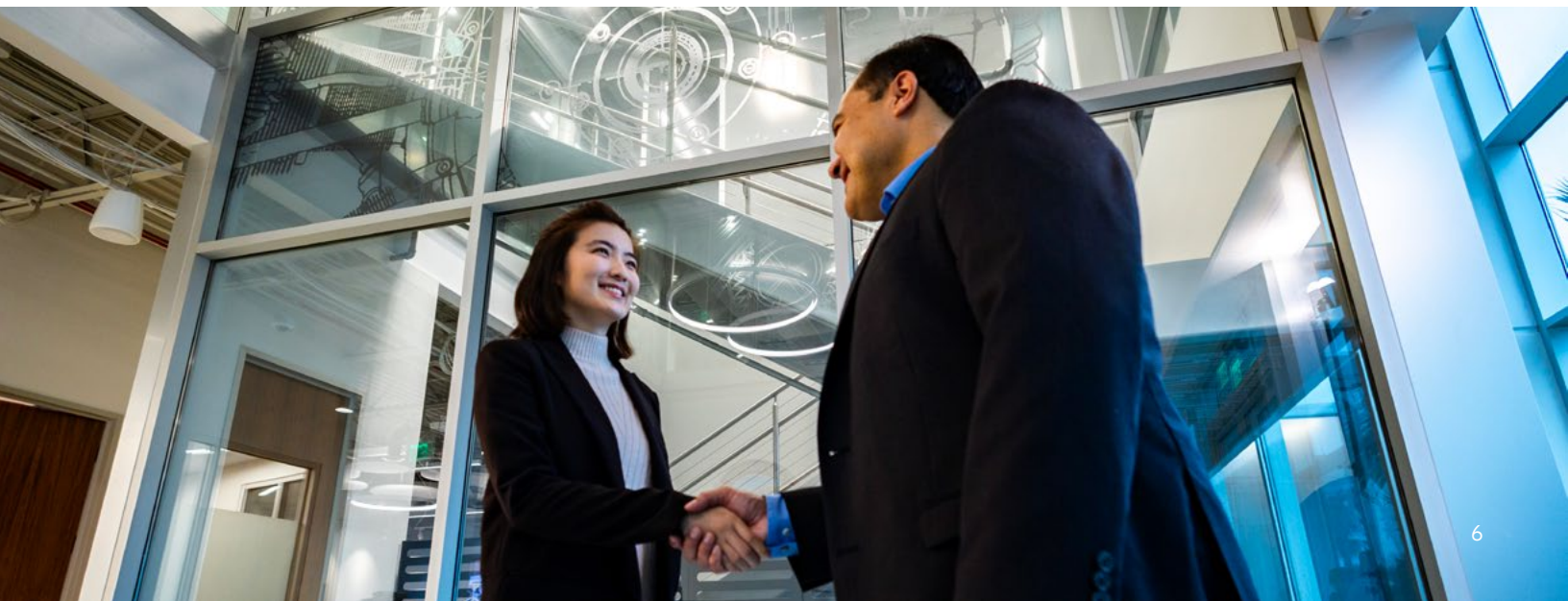
- Be mindful of how words and actions are received.
- Do not tolerate degrading or intimidating behavior.
- Listen actively and be open to different viewpoints.
- Address issues privately, not publicly.
- Seek Human Resources guidance for difficult discussions.
- Stay vigilant for signs of harassment or bullying.
- Avoid degrading or disparaging language based on protected characteristics.
- Report suspected harassment or bullying through appropriate channels.
- Foster a culture where concerns can be raised, knowing that retaliation will not be tolerated.

## Harassment is not tolerated

RTX does not tolerate harassment. We protect our people from any words or actions that create an intimidating, hostile, or offensive work environment. In many countries, including the U.S., harassment is illegal when based on legally protected characteristic(s) of the employee, such as:

- Sex.
- Sexual orientation.
- Gender identity or expression.
- National or ethnic origin or citizenship.
- Social origin, including caste.
- Religion or creed.
- Disability.
- Military or veteran status.
- Marital status.
- Any other category protected by applicable law.

Whether in person or online, harassment is not just what is intended but how others perceive it. It can be what a person says or writes, what a person does, or what a person wears or displays on a workstation or shares electronically.



# Promoting equal opportunity

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We provide everyone with the same chance to succeed based on their merits and measurable skills, without discrimination.

## Why it matters

We attract and develop talent transparently and fairly, focusing on values, culture, skills, and experience. Promoting equal opportunity helps us recruit, retain, and develop the best people, enhancing our pursuit of excellence. Fair treatment increases engagement and productivity, supporting our drive to create innovative and dependable products.

## How we make it happen

Promoting equal opportunity means that we help each other develop and reach our full potential and always:

- Base hiring and promotion decisions on qualifications and performance – never on favoritism or bias.
- Prohibit discrimination based on characteristics protected by applicable law, including:
  - Age.
  - Ancestry.
  - Disability.
  - Race.
  - Color.
  - Genetic information.
  - Military or veteran status.
  - Religion (including religious dress) or creed.
  - National, ethnic or social origin, including caste.
  - Sex, sexual orientation or gender identity or expression.
  - Medical condition.
  - Marital status.
  - Citizenship status
- Provide reasonable accommodations for disabled employees or those with specific religious requirements, as necessary.

# Dealing honestly and fairly

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We are fair, truthful and transparent in all our business dealings.

## Why it matters

Our reputation for integrity and honesty builds trust with customers and partners. Truthful communication about our products and services ensures we meet commitments and provide candid assessments. Fairness with business partners strengthens relationships, helping us deliver safe, reliable products. Competitors respect our commitment to fair competition.

## How we make it happen

Dealing honestly and fairly in the marketplace means that we:

- Market and sell products truthfully based on merits.
- Maintain integrity in bidding and negotiate contracts in good faith.
- Do not engage in collusive behaviors like bid rigging or price fixing.
- Focus on positive attributes of our products and do not disparage competitors.
- Only use intellectual property or sensitive data that we are authorized or otherwise have a right to use.
- Comply with all applicable laws and regulations.
- Ensure representatives, consultants, and partners follow these standards.



# Preventing bribery and corruption

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We succeed on the strengths of our people and products – never through bribery or other corrupt practices.

## Why it matters

We win business and select partners honestly and fairly, building trust and committing to ethical conduct. Corruption is illegal. It harms millions, prolongs poverty, and destabilizes economies. We reject corruption and use our influence to help stamp it out globally.

## How we make it happen

Preventing bribery and corruption means that we:

- Win based on the merits of our products and services.
- Never offer or accept bribes or kickbacks.
- Avoid promising anything of value to gain business.
- Follow company policies and values for business gifts.
- Record all transactions accurately and truthfully.
- Comply with anticorruption laws everywhere we operate.
- Choose partners carefully and monitor their conduct.
- Never use third parties for improper actions.

# Creating, maintaining and disclosing accurate books and records

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We keep accurate books and records, which is required by law and helps us to operate effectively and provide timely and truthful information to those who rely on it.

## Why it matters

Accurate record-keeping upholds RTX's commitment to financial integrity, quality and safety. Complete and accurate records enable sound business decisions and protect our reputation for truthfulness. Misstating financial results can lead to serious penalties.

## How we make it happen

Creating, maintaining and disclosing accurate books and records means that we:

- Record all transactions completely, accurately, and timely.
- Follow accepted accounting principles, policies, and controls.
- Never set up secret funds or liabilities.
- Use precise wording in records.
- Correct errors promptly and notify affected parties.
- Comply with records retention policies and legal hold notices.
- Accurately record gifts, hospitality, and sponsorships.
- Speak up about concerns on financial integrity.
- Maintain effective internal controls.



# Selecting and collaborating with the right partners

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We choose our business partners based on merit and shared values and treat them fairly.

## Why it matters

We collaborate with partners who provide expertise, resources, efficiency, and innovation to help us deliver reliable products on time and on budget. Our partners must share our ethical and safety standards, commitment to compliance and passion for making a positive impact.

## How we make it happen

Selecting and collaborating with the right partners means that we:

- Choose partners who meet our needs and share our values.
- Evaluate based on quality and safety record, price, service, reliability, and availability.
- Conduct due diligence to ensure partners are qualified and reputable.
- Monitor partner performance regularly.
- Expect compliance with anti-bribery laws and other laws and regulations.
- Treat all partners fairly and with integrity.
- Avoid conflicts of interest.
- Do not accept inappropriate gifts or favoritism.
- Ensure collaborations meet antitrust and competition laws.
- Formalize relationships in writing.
- Seek partnerships with small, disadvantaged, and minority-owned businesses.

# Serving government customers

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We value our government customers and comply fully with the special rules and regulations that apply to each of them.

## Why it matters

We work closely with government entities worldwide, following specific rules and regulations for contracts, pricing, and deliverables. By competing fairly and complying with all requirements, we serve our government customers well and build their confidence in us as a reliable supplier.

## How we make it happen

Serving government customers means that we:

- Take the time to learn the rules, ask questions and seek out guidance.
- Understand and confirm our ability to comply with all requirements before entering into contracts, and comply with those requirements throughout performance.
- When disclosure is required, ensure cost or pricing data are current, accurate, and complete.
- Engage constructively with government customers regarding contract performance.
- Account for contract costs (including employee time-charging) accurately.
- Comply with restrictions on gifts, gratuities, employment offers, etc., to government officials and their relatives.
- Protect classified information and promptly report escapes or threats.
- Safeguard government property through proper storage, tracking, labeling and security measures.

# Competing fairly and legally

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We compete vigorously, yet always fairly and legally, wherever we do business.

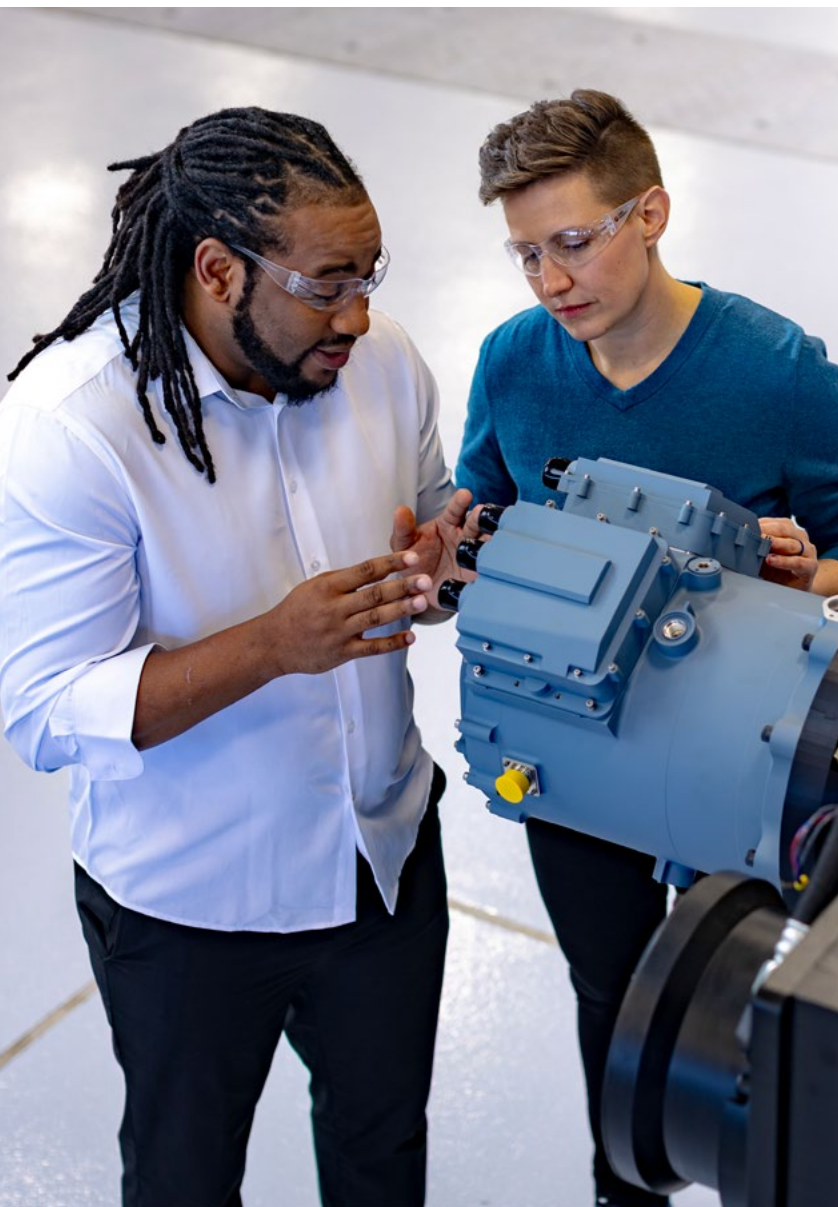
## Why it matters

Competition drives us to be more efficient and innovative, benefiting us and our customers with better value. Anticompetitive practices distort the marketplace, which can lead to higher prices and poor-quality products. They also harm government customers and taxpayers. We compete fairly and legally because it's the right thing to do and protects our reputation.

## How we make it happen

Competing fairly and legally means that we:

- Act independently, not in coordination with competitors, unless in a legitimate business arrangement, such as a joint venture or teaming relationship.
- Never share bid details with others unless lawful and necessary.
- Seek approval before participating in trade associations and other groups that require frequent contacts with competitors.
- Consult Legal before engaging in practices that could harm competition.
- Report competition concerns to Ethics & Compliance or Legal.



## Gathering competitive intelligence

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We gather information and learn about the marketplace and our competitors only through legal and ethical means.

## Why it matters

In a global marketplace, learning about our competition through appropriate means helps us hone our products and anticipate customer needs. We must never violate the law or compromise our integrity to obtain nonpublic information, or misuse the legitimate intellectual property of others. We treat customers and competitors fairly and honestly, as we expect to be treated.



# Doing business globally

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As a global company, we follow all applicable laws governing international trade, including export and import controls, sanctions and U.S. anti-boycott laws and regulations.

## Why it matters

RTX's civil and military products and technologies (including data and software) are vital to the national security of the United States and to the countries where we operate and do business. As a global company with customers, suppliers, partners, employees and regulators worldwide, we must follow all applicable export and import controls, sanctions, and U.S. anti-boycott laws. Meeting our trade compliance obligations helps ensure that our products, technologies, and services go where they are supposed to go to compliantly and that they are used appropriately. Failure to comply can violate the public trust and damage RTX's reputation.

Meeting our trade compliance obligations helps:

- Safeguard national security and support foreign policy.
- Prevent weapons proliferation and product diversion.
- Protect products and technologies from misuse or unauthorized access.
- Maintain the trust of our customers and regulators.
- Compete compliantly and effectively in global markets.
- Support global operations.

Failure to comply can harm national security and our ability to serve customers, resulting in loss of trust and significant fines.

## How we make it happen

Meeting our trade compliance obligations means that we:

- Identify and correctly classify products and technologies.
- Mark controlled items appropriately.
- Safeguard products and technology.
- Screen all parties to transactions against sanctioned country and restricted party lists.
- Ensure appropriate authorizations are in place for exports, re-exports, retransfers and imports prior to the transfer.
- Manage authorizations and maintain accurate records.
- Correctly value imported goods.
- Appropriately report fees and commissions paid to representatives or consultants.
- Avoid boycott-related activities and report boycott requests.



# Avoiding conflicts of interest

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We make smart choices in the best interests of our company, unaffected by personal interests or relationships.

## Why it matters

We never let personal interests interfere with RTX's decisions. Good judgment helps us maintain excellence and innovate without distraction. Even the appearance of a conflict can be harmful, so we promptly disclose and manage conflicts.

## How we make it happen

Avoiding conflicts of interest means that we:

- Identify potential conflicts proactively.
- Comply with conflict-of-interest laws and regulations.
- Disclose conflicts according to policy.
- Remove ourselves from decisions where conflicts exist.
- Avoid decisions influenced by personal gain or relationships.
- Win business based on trust, not inappropriate gifts.
- Stay loyal to RTX and avoid using company resources for personal gain.
- Give our best effort at work without outside job distractions.

# Protecting our intellectual property and confidential business information

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We safeguard our intellectual property (IP) and confidential information from misuse, misappropriation, destruction and loss.

## Why it matters

RTX's intellectual property assets protect our continuing work to create the world's most innovative aerospace and defense products and create a platform for future innovation and growth.

## How we make it happen

Protecting our intellectual property means that we:

- Access and use RTX intellectual property and information only as necessary to perform our duties.
- Share confidential information only with those authorized and with a business need to know.
- Ensure necessary agreements to protect our intellectual property and confidential information are in place before engaging with third parties.
- Promptly disclose new inventions that we create so they may be evaluated in time for patenting.



# Respecting others' intellectual property and commercial rights

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We respect the IP and commercial rights of others as we would want them to respect ours.

## Why it matters

It would violate our values of trust and respect to take credit for or steal any ideas that are not our own. In addition, the use of others' protected rights without permission is against the law and could expose us to legal, financial and reputational risk.

## How we make it happen

Respecting others' intellectual property and commercial rights means we:

- Report suspected theft, improper disclosure or misuse of proprietary information, suspected counterfeit products, trademark misuse, or IP misappropriation.
- Do not bring to RTX or use IP or proprietary information gained through prior employment.
- Only use third party works, including images, content, publications or other content found on the internet, if we have licenses to allow that use.
- Recognize others' copyrights, logos, trademarks, trade names, and designs in our marketing and other publications.

# Preventing insider trading

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We never use or share inside information about RTX or other companies for trading securities.

## Why it matters

We may access information useful to investors through our work. Protecting this information honors our value of trust. Insider trading is illegal and provides an unfair advantage.

## How we make it happen

Preventing insider trading means:

- Never trade shares while aware of inside information until it's public.
- Do not share inside information with anyone outside RTX, including family.
- Share inside information with colleagues only on a need-to-know basis.
- Protect inside information from accidental disclosure.
- Never "short sell" or hedge RTX shares.



# Protecting personal information

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We protect the privacy of personal information by limiting its use and collection for legitimate business purposes permitted by law.

## Why it matters

In the digital age, data privacy is crucial. RTX collects, stores, uses, and shares personal information to run our business and comply with legal obligations. Personal information must be used appropriately and kept safe to meet legal requirements and protect our reputation.



# Valuing our diverse talents, ideas and contributions

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The unique skills, experiences and abilities of our global workforce bring collective strength, wisdom and innovation.

## Why it matters

It is essential for our internal culture, teams and environment to be prepared and equipped to unlock our fullest potential in the evolving world around us and are able to bring the best solutions forward in the work we do.

## How we make it happen

Powering our work through collaboration, mutual respect and common purpose means that we:

- Actively seek alternative opinions and encourage others to speak up.
- Listen respectfully to benefit from different thoughts and ideas.
- Speak up when a viewpoint is missed or overlooked.
- Ask for and be open to feedback on improvement.

# Protecting our planet

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We address climate challenges and commit to improving the environmental impacts of our products and businesses.

## Why it matters

Sustainability is one of our customers' and the world's biggest challenges. We can do our part by designing innovative solutions to improve our customers' environmental footprints as well as manage our own.

## How we make it happen

We focus on:

- Adhering to environmental laws and safe disposal of hazardous waste.
- Advancing sustainable technology and innovation.
- Reducing energy and greenhouse gas emissions.
- Minimizing resource usage.
- Expecting sustainable practices from key suppliers.



# Respecting and protecting human rights

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We are committed to good citizenship and engaging with others to promote better working conditions for all.

## Why it matters

Our global footprint allows us to fight for safer working conditions and equal opportunities. We protect our workers and promote positive change by holding ourselves and our business partners and communities accountable for respecting human rights, including environmental responsibility, equal opportunities, fair wages, and safe working conditions.

## How we make it happen

Respecting and protecting human rights mean that we:

- Promote responsible sourcing and hold partners to our standards.
- Work with partners committed to fighting human trafficking and supporting human rights.
- Condemn and prohibit child or forced labor.
- Follow policies and regulations on conflict minerals.

# Engaging in the political process

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We engage thoughtfully in the political process while advocating for our interests.

## Why it matters

We have a legitimate stake in political priorities and outcomes. Responsible political participation helps us stay engaged and invested in our communities.

## How we make it happen

When participating in the political process:

- Actively seek alternative opinions and encourage others to speak up.
- Avoid contacting government officials on behalf of RTX without verifying compliance with company policy.
- Do not make corporate contributions to political parties or candidates.
- Consult Ethics & Compliance and Global Government Relations if you plan to run for or hold public office, to avoid conflicts of interest.
- Follow rules on lobbying, political activity and related disclosures.
- Never apply improper influence on government agencies.
- Make clear when engaging in politics as private citizens that your views and actions are your own, not those of RTX
- Use personal resources, not RTX's, for political activities.

# Getting help

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We pride ourselves on acting with integrity and supporting each other, especially in challenging moments. If you see or suspect a violation of the law, a regulation, the Code or company policy, you are empowered and expected to act. There are many resources available to support all employees, and concerns can be reported anonymously, subject to local law.

**RTX prohibits retaliation against anyone who raises ethical concerns in good faith or cooperates with investigations.** Retaliation, such as firing, demotion, or harassment, will result in discipline, including possible termination.

**Good faith** means having sensible reasons to believe a violation occurred and reporting it respectfully and truthfully. You may raise concerns with another supervisor (of any level), Human Resources, an Ethics & Compliance Officer, Legal, Contracts and Compliance, or through the Speak Up Hub.

Visit the **Global Ethics & Compliance microsite** for current reporting channels and contact information.

## What happens if you raise a concern?

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When a violation of the law, Code, or policy is reported, RTX will conduct a thorough investigation, maintaining confidentiality as much as possible.

RTX treats all parties with respect during investigations. Employees and partners must be truthful, transparent, and cooperative. Cooperation may involve interviews, providing documents, or otherwise supporting the investigation. Where possible, reporters will be informed of the investigation outcome.

If a violation is confirmed, disciplinary measures may include counseling, warnings, suspension, or termination. Possible illegal conduct will be referred to law enforcement. Global Ethics & Compliance and Human Resources will ensure fair and consistent disciplinary processes and will investigate claims of retaliation.

## Waivers

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Waiver of all or part of this Code or RTX policies issued to implement it will be granted only in exceptional circumstances and only after approval by the executive vice president and general counsel. Any waivers for directors and executive officers must be approved by both the executive vice president and general counsel, and the Board's Governance & Public Policy committee, and any waivers will be disclosed promptly as required by law, regulation and company policy.