

Standard terms of business

MJ Sections Ltd including its subsidiaries (collectively MJ Sections Aerospace Group) is committed to the highest standards of ethics and business conduct. As stated in our code of ethics, MJ Sections Ltd employees must comply with the law, honour their commitments, act in good faith and uphold MJ Sections Ltd Values. Employees who act on behalf of MJ Sections Ltd are expected to treat compliance to this code of conduct as a key element of their daily working lives. We pride ourselves on high standards of service and the professional and ethical conduct of all our employees.

Our suppliers & customers are critical to our success and, in order to provide superior products and services in a responsible manner, we require them to meet our expectations for ethics and compliance.

This code of conduct applies to all our customers, employees and suppliers and we would expect that all business associates of MJ Sections Ltd will have their own internal codes of ethics and conduct.

You are responsible for ensuring that your directors, employees, representatives, and business partners understand and comply with the expectations set forth in this code.

Compliance with laws

At a minimum, MJ Sections Ltd, our customers and suppliers must maintain full compliance with all laws and regulations applicable to the operations of their business. This includes compliance to all applicable laws prohibiting any form of corruption, bribery, sales or shipments to embargoed countries and the restriction of imports or exports where necessary.

Bribery and corruption

Anything which constitutes or creates an unfair or improper business advantage should be avoided. It is unacceptable to pay a bribe in any amount, to anyone, anywhere, for any reason whatsoever, whether on MJ Sections Ltd behalf, your behalf or on behalf of others. Accordingly, we must never offer or accept, promise, authorise or provide, directly or indirectly anything of value (including business gifts or courtesies) with the intent of effect of inducing anyone.

Conflict of interest

We should avoid all conflicts of interest or situations giving the appearance of a conflict of interest in all our dealings. Employees should recognise personal relationships and situations where it will be difficult to apply objectivity.

International trade compliance

We conduct our business in strict compliance with all applicable laws and regulations governing the export, re-export and transfer of goods, technical data, software and services; import of goods, economic sanctions and embargoes.

Information protection

We must respect the legitimate proprietary rights and intellectual property rights of MJ Sections Ltd and others. We must take proper care to protect sensitive information, including confidential, proprietary, technology and personal information in order to ensure protection to intellectual property rights.

Competition on the merits and fair play

MJ Sections Ltd will only compete strictly on the basis of the merits of our products and services. We do not collude with our competitors on pricing matters, products, bids or sales agreements. We expect our business associates to do the same. We do not engage in deceptive practices whether on our behalf or on behalf of others and we will never denigrate any of our competitors, their products or services.

Child labour

MJ Sections Ltd do not condone the use of child labour. We ensure that no child labour is used in the performance of our work, whether or not related to our business requirements. The term "child" refers to any person under the minimum legal age for employment where the work is performed.

Quality

MJ Sections Ltd has established a quality management system to meet our customers diverse needs. This involves a structured system of written practices for all our activities which allows us to deliver products and services on time, to the correct specification. We expect all our suppliers to comply with all quality control requirements, both dictated by industry governing legislation and via specific customer requirements. As a minimum all suppliers quality management system will comply to the requirements of AS9100, AS13100 (including identifying organisational type) and customer specific requirements as defined on the purchase order. Any supplier must notify M.J Sections of any significant changes to its QMS or business operations immediately.

In the event of a work transfer being required the supplier will be required to comply with the requirements set out within the customer specifications and any additional activities identified as part of a risk-based approach to the change.

Right of access to investigate non conformance, review quality/manufacturing records and/or to demonstrate conformance of the products must be made available and facilitated by the supplier.

Integrity

At MJ Sections Ltd integrity is fundamental to our core values and principles through both personal and professional behaviour. We are committed to conducting our business honestly and fairly. We demonstrate our understanding of these values and principles and uphold them in every action and decision. All employees of MJ Sections Ltd are expected to share these values and principles. To this end:

No employee shall engage in personal activities or pursue financial or business interests which might give rise to, or give the appearance of, conflicts of interest with MJ Sections Ltd or which might compromise their ability to meet the responsibility of their job.

MJ Sections Ltd employees who have access to privileged information (including proprietary and confidential information, whether belonging to MJ Sections Ltd or others) must not use it to achieve personal gain for themselves or others.

MJ Sections Ltd employees must ensure proper and responsible use of all MJ Sections Ltd assets, including physical property, intangible assets, IT equipment and communication resources.

Conflict minerals

MJ Sections Ltd is committed to sourcing materials from companies that share our values around human rights, ethics and environmental responsibility. We expect all our suppliers to abide by the requirements of our supplier code of conduct and to comply with all legal standards and requirements. We are committed to complying with any requirements that are applicable to our company under the Conflicts Mineral Rule. We strive to work with our customers and supply chain partners in implementing conflict minerals compliance programmes.

Health safety and the environment

MJ Sections Ltd promotes environmental excellence across all our sites and expects the same throughout our business associates in order to reduce our environmental footprint. We actively reduce the production and encourage the recycling of waste; whilst also promoting hybrid car usage throughout our employees. These beliefs are communicated throughout the organisation in compliance with environmental legislation and ISO14001:2015

We ensure we comply with all health and safety laws, regulations and directives and also conduct our operations in a manner that provides safe and healthy work environments for our employees and business invites.

Criminal finances act 2017

MJ Sections Ltd value our reputation for ethical behaviour and for financial probity and reliability. We recognise that over and above the commission of any crime, any involvement in the facilitation of tax evasion involving ourselves or any of our business associates will also reflect adversely on our image and reputation.

MJ Sections Ltd will not tolerate tax evasion, or the facilitation thereof under any circumstances, whether committed by or facilitated by a client, company employees, or associated businesses that we deal with.

MJ Sections Ltd are committed to fighting tax evasion and have ensured that rigorous policies and procedures are in place to detect and prevent the facilitation of tax evasion offences throughout our business.

MJ Sections Ltd undertake due diligence on all personnel and business associates to mitigate the risk of facilitation of tax evasion offences and, as part of our due diligence procedures, all appropriate agreements with third parties entered into after 31 December 2017 contain suitable provisions to enable termination of such agreements where associated personnel or businesses are not complying with the provisions of the Criminal Finances Act 2017.

Code compliance

All entities are responsible for ensuring compliance to this code of conduct with their directors, officers, employees, representatives and suppliers.

Any questions you may have with the above should be raised with MJ Sections Ltd and will be treated confidentially and investigated properly and promptly whether it be raised internally or externally.

MJ Sections Ltd operates a whistle-blower policy that protects individuals against actions being taken against them for raising concerns in good faith.

Counterfeit materials

All suppliers must have implemented a counterfeit material process that is compliant to the requirements of AS9100 and AS6174 or AS5553 (as applicable) or customer specific requirements (as per specified on relevant purchase order). In the event of counterfeit material being identified the supplier must inform the company within 3 working days of it being confirmed.

Company awareness

All suppliers must ensure that all personnel within their organisation understand their contribution to product and/or service conformity, product safety and the part they play in the ethical behaviours of the business.