

DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

FINAL ASSESSMENT

CURTISS-WRIGHT CORPORATION

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

| Section | Number of Questions* | Score Based on Publicly Available Information |
|--|----------------------|---|
| 1. Leadership and Organisational Culture | 4 | 2/8 |
| 2. Internal Controls | 6 | 1/12 |
| 3. Support to Employees | 7 | 3/14 |
| 4. Conflict of Interest | 4 | 4/8 |
| 5. Customer Engagement | 7 | 1/14 |
| 6. Supply Chain Management | 5 | 1/10 |
| 7. Agents, Intermediaries and Joint Ventures | 10 | 1/20 |
| 8. Offsets | 4 | 0/8 |
| 9. High Risk Markets | 4 | 2/8 |
| 10. State-Owned Enterprises | 0 | N/A |
| TOTAL | | 15 / 102 |
| BAND | | F |

*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

1. Leadership and Organisational Culture

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| Question |
| 1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership? |
| Score |
| 1 |
| Comments |
| <p>There is evidence that the company has a publicly stated anti-bribery and corruption commitment, which is reflected in its Code of Conduct. This is endorsed by the company's leadership in the form of an introductory message from the Chairman and Chief Executive Officer. However, the company receives a score of '1' because this message does not explicitly mention anti-corruption or bribery.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx</p> <p>[p.1] Dear Fellow Employee:</p> <p>Curtiss-Wright has a strong commitment to ethics, integrity, and making decisions that comply with all applicable laws and regulations. These core values define the means by which we do business.</p> <p>In our work, we are frequently faced with a number of difficult business decisions. It is important to remember that what we decide in these situations can have unintended consequences and negatively impact the reputation of, and create legal liability for, Curtiss- Wright.</p> <p>To help guide our behavior and the way we do business, we developed the Code of Conduct. The principles illustrated in the Code amplify the honest and professional manner expected of every Curtiss-Wright employee and act as the foundation for understanding how to handle many of the situations you may encounter while working for Curtiss-Wright. The Code provides each of us with necessary information about how to act ethically and within the laws affecting our business.</p> <p>Our company's reputation with our customers, vendors, stockholders, and the communities we serve requires our professional excellence, solid judgment, and uncompromising integrity. Overall, businesses are becoming more and more challenging to manage. New laws, competition, budgetary restraints, technological innovations, business re-engineering, and the increasing globalization of business makes our operations even more demanding than in the past.</p> <p>These increased demands serve to highlight the importance of business ethics. Cutting corners to obtain or retain business is not our way. We don't take shortcuts; we conduct business properly. Our challenging environment requires an even greater commitment to our Code. We have zero tolerance for any violation of the provisions of the Code.</p> <p>I ask each of you to read the Code carefully, to affirm its principles, and to adhere to its requirements in all of your professional endeavors. While the Code cannot address every decision that you may face during your career at our company, it serves as a useful guide. Please keep it and refer to it as needed.</p> <p>If you are faced with a situation where you think Curtiss-Wright's values or compliance with the law may be in question, you should bring this to the attention of your supervisor. If you would prefer to report the matter to someone other than your supervisor, contact your Human Resources representative, Curtiss-Wright's Legal Department, the Curtiss-Wright Hotline at (844) 286-0072, or make a report online at www.curtisswright.ethicspoint.com. For international dialing instructions, go to www.curtisswright.ethicspoint.com. You may report anonymously if you are unwilling to provide your name.</p> <p>[p. 2] Remember, our reputation is earned one person at a time, and each of us contributes to that reputation. Thank you for always protecting Curtiss-Wright's integrity.</p> |

Sincerely,

David C. Adams
Chairman and Chief Executive Officer

[p. 7] Curtiss-Wright strictly prohibits bribes, kickbacks or any other form of improper payment, direct or indirect, to any representative of government, labor union, customer or supplier in order to obtain a contract, some other commercial benefit or government action. Curtiss-Wright also strictly prohibits any employee from accepting such payments from anyone. Please review Policy No. 11, Anti-Bribery, found along with the other Curtiss-Wright corporate policies at <https://www.mycurtisswright.com/> for detailed guidance on avoiding bribery and other corruption issues.

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| Question |
| <p>1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories:</p> <p>a) All employees, including staff and leadership of subsidiaries and other controlled entities; b) All board members, including non-executive directors.</p> |
| Score |
| 1 |
| Comments |
| <p>There is evidence that the company publishes an anti-bribery and corruption policy, which makes explicit reference to the prohibition of bribery, payments to public officials and commercial bribery. This policy clearly applies to all employees and board members as described in (a) and (b) in the question. However, the company receives a score of '1' because there policy does not make specific reference to facilitation payments.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx</p> <p>[p. 5] Curtiss-Wright Corporation and its subsidiaries (collectively, "Curtiss-Wright") operate their worldwide businesses in accordance with the highest ethical standards and relevant laws. Curtiss-Wright places the highest value on the integrity of each of its employees, officers, consultants, agents, and contractors (collectively, "Representatives"). All Representatives of Curtiss-Wright are responsible for complying with all applicable laws, rules, regulations, Curtiss-Wright policies, and this Code of Conduct (this "Code"). The code of conduct applicable to members of Curtiss-Wright's Board of Directors is set forth in the Corporate Governance Guidelines, which are available on Curtiss-Wright's website and from Curtiss- Wright's Law Department. Curtiss-Wright's corporate culture demands not only legal compliance, but also responsible and ethical behavior. Failure to comply with this Code, Curtiss-Wright policies, and applicable laws, rules, and regulations can have severe consequences for both the individuals involved and Curtiss-Wright, including disciplinary action, civil penalties or criminal prosecution under certain circumstances.</p> <p>The policies in this Code apply across Curtiss-Wright, in all businesses, countries, and regions, unless otherwise specifically noted. It covers all Representatives of Curtiss-Wright. The Code is not intended to cover all Curtiss-Wright policies or all laws, but instead should be used as a resource to determine the ethical appropriateness of a situation and where to seek guidance when in doubt. If a local law conflicts with a policy in this Code, you must comply with the law; if a local custom or practice conflicts with a policy in this Code, you must comply with the Code. In addition, if your business or region has a policy or practice that conflicts with this Code, you must comply with the Code. Your business or region may have policies and practices that require more of you than is required by this Code, and the same may be true of local law; in all of those instances, you must follow the stricter policy, practice, or law. Think of this Code as a baseline, or a minimum requirement, which must always be followed. If the applicable law conflicts with the Code but could permit different alternatives you must choose the one most closely aligned with the Code requirement. If in doubt contact a member of the Law Department.</p> <p>[p. 7] Curtiss-Wright strictly prohibits bribes, kickbacks or any other form of improper payment, direct or indirect, to any representative of government, labor union, customer or supplier in order to obtain a contract, some other commercial benefit or government action. Curtiss-Wright also strictly prohibits any employee from accepting such payments from anyone. Please review Policy No. 11, Anti-Bribery, found along with the other Curtiss-Wright corporate policies at https://www.mycurtisswright.com/ for detailed guidance on avoiding bribery and other corruption issues.</p> <p>Curtiss-Wright imposes certain limitations on offering and giving existing or potential commercial customers gratuities and business courtesies so long as they are not provided for the purposes of obtaining or retaining business or some other commercial benefit. Please review Policy No. 39, Gift and Entertainment Policy, found along with the other Curtiss-Wright corporate policies at https://www.mycurtisswright.com/ for detailed guidance on offering and giving gratuities and business courtesies to existing or potential commercial customers.</p> <p>[p. 9] The Foreign Corrupt Practices Act ("FCPA") prohibits Curtiss-Wright from making a payment or giving a gift to a foreign government official, political party or candidate or public international organization ("foreign official") for purposes of obtaining or retaining business. The FCPA applies to Curtiss-Wright everywhere in the world we do</p> |

business. A violation occurs when a payment is made or promised to be made to a foreign official while knowing that the payment will be used to unlawfully obtain or maintain business or direct business to anyone else. Employees should contact a member of the Law Department with questions.

[03] 2019 Proxy Statement (Document)

Accessed 05/07/2019

https://s1.q4cdn.com/395056968/files/doc_financials/2018/CW-Proxy-2019-Final.pdf

[p. 11] The corporate governance guidelines contain a code of conduct that applies to every Director. The Company also maintains a code of conduct that applies to every employee, including the Company's Chief Executive Officer, Chief Financial Officer, and Corporate Controller.

[02] Corporate Governance Guidelines (Document)

Accessed 05/07/2019

<https://www.curtisswright.com/investors/corporate-governance/corporate-governance-guidelines/default.aspx>

[p. 5] The Board has adopted this Code of Conduct (the "Code") for Directors of the Company. The Code provides guidance to Directors on ethics matters, provides a framework to report potential compliance issues and seeks to foster a culture of compliance and accountability. Directors who also serve as officers of the Company should read this Code in conjunction with the Company's Code of Conduct.

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| Question |
| 1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme? |
| Score |
| 0 |
| Comments |
| <p>There is no evidence that the company has a designated board committee or individual board member responsible for its anti-bribery and corruption programme. The company has a Committee on Directors and Governance but there is no publicly available evidence that specifically states that this committee's responsibilities include oversight of the anti-bribery and corruption programme.</p> |
| Evidence |
| <p>[02] Corporate Governance Guidelines (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/corporate-governance-guidelines/default.aspx [p.3] The Board shall establish such committees as are necessary for the Board to discharge its responsibilities and exercise its rights effectively. At a minimum, the Board shall establish committees on Audit, Executive Compensation and Directors and Governance. Any Director may attend a meeting of a Committee of which he is not a member unless it would be inappropriate for him to do so because of his/her personal interest in a matter to be considered at that meeting. The responsibilities of each Committee will be set forth in the committee charters adopted by the Board, subject to any changes the Board subsequently may deem desirable.</p> <p>[04] Committee on Directors and Governance Charter (Document) Accessed 06/07/2019 https://s1.q4cdn.com/395056968/files/doc_governance/2018/DG-Charter-Revision-June-2017.pdf [p.1] The purpose of the Committee is to carry out the responsibilities delegated by the Board relating to the Company's director nominations process and maintaining the Company's corporate governance polices.</p> <p>[p. 2] 4. The Committee shall provide leadership to the Board in assessing the Board's performance, developing recommendations to enhance the Board's effectiveness and overseeing the process of implementing agreed upon actions to improve performance.</p> <p>[...]</p> <p>6. The Committee will periodically review with the General Counsel the Company's policies and procedures for governing the operations of the Board and the Company's corporate governance framework. The Committee will recommend to the Board any changes, amendments and modifications to the policies and procedures it deems appropriate.</p> <p>7. The Committee will conduct an annual assessment of its operations and provide a report of the assessment to the full Board.</p> <p>[p. 3] 11. The Committee shall develop and recommend to the Board a set of corporate governance guidelines applicable to the Corporation. In addition, the Committee shall periodically review and update such principles.</p> <p>12. The Committee shall develop and recommend to the Board for approval standards for determining whether a director has a relationship with the Company that would impair the director's independence.</p> |

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| Question |
| 1.4. Is responsibility for implementing and managing the company’s anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company’s programme? |
| Score |
| 0 |
| Comments |
| There is no evidence that a specific executive or managerial-level employee has ultimate responsibility for implementing and managing the company’s anti-bribery and corruption programme. |
| Evidence |
| No evidence found. |

2. Internal Controls

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| Question |
| 2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces? |
| Score |
| 0 |
| Comments |
| <p>There is evidence that the company has a risk assessment procedure in place that informs its decisions and the design of the company's programmes. However, there is no publicly available evidence that this risk assessment procedure informs the design of the company's anti-corruption and bribery programme. Publicly available documents refer to 'compliance' generally and seem to focus on financial risk rather than anti-bribery and corruption risks.</p> |
| Evidence |
| <p>[03] 2019 Proxy Statement (Document) Accessed 05/07/2019 https://s1.q4cdn.com/395056968/files/doc_financials/2018/CW-Proxy-2019-Final.pdf [p. 12] The Audit Committee's primary responsibilities includes assisting the Board in fulfilling its oversight responsibility relating to the integrity of the Company's financial statements and the financial reporting process; the systems of internal accounting and financial controls; the qualifications and performance of the Company's internal audit function and internal auditors; the annual independent audit of the Company's financial statements; the appointment and retention (subject to stockholder ratification), compensation, performance, qualifications, and independence of the Company's independent registered public accounting firm; enterprise risk assessment and management; review of the Company's information security and technology program (including cybersecurity); and the Company's compliance with legal and regulatory requirements (including environmental matters) and ethics program.</p> <p>[p. 14] The Board of Directors oversees risk to help ensure a successful business at the Company. While the Chairman and Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, and other members of the Company's senior leadership team are responsible for the assessment and day-to-day management of risk, the Board of Directors is responsible for assessing the Company's major risks and ensuring that appropriate risk management and control procedures are in place.</p> <p>The Company relies on a comprehensive enterprise risk management program to aggregate, monitor, measure, and manage risk. The Company's enterprise risk management program is designed to enable the Board to establish a mutual understanding with management of the effectiveness of the Company's risk management practices and capabilities, to review the Company's risk exposure, and to elevate certain key risks for discussion at the Board level. While the Board has the ultimate oversight responsibility for risk management processes, various committees of the Board composed entirely of independent directors, also have responsibility for aspects of risk management. The Board and its committees are kept informed by various reports on risk identification and mitigation provided to them on a regular basis, including reports made at the Board and Committee meetings by management.</p> <p>The Audit Committee of the Board, acting pursuant to its written charter, serves as the principal agent of the Board in fulfilling the Board's oversight of risk assessment and management, including with respect to major strategic, operational, financial reporting, legal and compliance, information security and technology risks (including cybersecurity). The Company's Director of Internal Audit, who reports to the Audit Committee, facilitates the enterprise risk management program and helps ensure that risk management is integrated into the Company's strategic and operating planning process. The Director of Internal Audit regularly updates the Audit Committee on the Company's risk management program throughout the year through discussions of individual risk areas, as well as an annual summary of the enterprise risk management process. The Audit Committee also reviews and receives regular briefings concerning the Company's information security and technology risks (including cybersecurity), including discussions of the Company's information security and risk management programs. The Company's Chief Information Officer leads the Company's cybersecurity risk management program, which is fully integrated into the overall enterprise risk management program and overseen by the Audit Committee. The Audit Committee reviews</p> |

with management such risks and the steps management has taken to monitor, mitigate, and control such risks. The Chairperson of the Audit Committee then reports to the full Board on the risks associated with the Company's operations.

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| Question |
| 2.2. Is the company’s anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations? |
| Score |
| 0 |
| Comments |
| There is evidence that the company organises internal audits to ensure full compliance with all relevant laws, regulations and internal policies. The company also states that the Code of Conduct for Directors is reviewed on an annual basis. However, it is not clear from publicly available evidence that the anti-bribery and corruption programme itself is subject to audit or review, or whether findings are used to update the programme. |
| Evidence |
| <p>[07] Corporate Social Responsibility (Document) Accessed 06/07/2019 https://www.curtisswright.com/investors/corporate-governance/Corporate-Social-Responsibility/default.aspx [p. 3] Control and Compliance. Curtiss-Wright is committed to ethical business practice and creating the best possible work environment for all employees. An optionally anonymous global reporting system called EthicsPoint is available to all employees, in their local language, to report workplace issues or suggest improvements. Additionally, the Corporate Internal Audit and EH&S functions conduct multiple local inspections annually to ensure full compliance with all applicable laws, regulations, policies, and procedures.</p> <p>[02] Corporate Governance Guidelines (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/corporate-governance-guidelines/default.aspx [p. 8] L. Annual Review The Board shall review and reassess the adequacy of this Code annually and make any amendments to this Code that the Board deems appropriate.</p> |

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| Question |
| 2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels? |
| Score |
| 1 |
| Comments |
| <p>There is evidence that the company publicly commits to investigating allegations and incidents promptly and objectively. There is evidence that the company has specific procedures in place to involve the Legal Department and any other relevant business units in investigations. In addition, there is evidence that the company takes steps to ensure the independence of investigations through the use of an externally-operated hotline; however there is no evidence of how the company ensures this when evaluating reports internally.</p> <p>The company receives a score of '1' because it does not provide further details of its investigative procedure – both for reports received through the whistleblowing hotline and those reported directly – and does not stipulate documentation of cases beyond recording allegations through the hotline. There is also no evidence that the company commits to ensure whistleblowers are informed of the outcome, if they so wish. Furthermore, there is no evidence that summary information is reviewed by a central body at least on an annual basis.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 11] 3. Curtiss-Wright will provide the channels through which we are able to report suspected violations of our Code or other Company policy.</p> <p>4. To the extent possible, Curtiss-Wright will maintain the confidentiality of our communications about suspected violations that are made in good faith, except where law or policy may require disclosure.</p> <p>[p. 16] Senior Financial Officers will exhibit and promote the highest standards of honest and ethical conduct through the establishment and operation of policies and procedures that: [...]</p> <p>10. Provide a mechanism for members of the finance organization to inform senior management of deviations in practice from policies and procedures governing honest and ethical behavior.</p> <p>[p. 17] Curtiss-Wright employees have a duty to cooperate with requests for information when such requests are received from Curtiss-Wright management or auditors or when legitimate requests for information are received by Curtiss-Wright from governmental authorities. No Curtiss-Wright employee shall falsify, destroy or conceal documents when such documents have been requested. In addition, no Curtiss-Wright employee shall make false or misleading statements or withhold information from management, auditors, or government investigators or officials. Any employee who becomes aware of such conduct shall report it to the Office of the General Counsel.</p> <p>[p. 22] Employees shall report violations or possible violations of laws, regulations, company policies or this Code of Conduct to their supervisor. If you would prefer to report the matter to someone other than your supervisor, contact your Human Resources representative, Curtiss-Wright’s Legal Department, the Curtiss-Wright Hotline at (844) 286-0072, or make a report online at www.curtisswright.ethicspoint.com. [...] If you call the Curtiss-Wright Hotline, a trained representative will speak with you about the matter and will write down the points made during the telephone call. If you prefer to speak to the representative in a language other than English, an interpreter will be made available. After the telephone call is finished, a written report will be sent by the Curtiss-Wright Hotline representative to the Curtiss-Wright Legal Department for investigation, preserving the anonymity of those who request it. Online reports are entered by employees directly on the EthicsPoint secure server at www.curtisswright.ethicspoint.com.</p> <p>[p. 23] Allegations will be investigated at the direction of the Legal Department by the proper corporate, business unit or department personnel. Our investigations are impartial, objective, thorough, and timely.</p> |

[11] EthicsPoint – Curtiss-Wright Corporation (Webpage)

Accessed 24/10/2019

<https://secure.ethicspoint.com/domain/media/en/gui/42903/index.html>**OUR COMMITMENT**

Curtiss-Wright is an organization with strong values of responsibility and integrity. Our written standards and policies contain general guidelines for conducting business with the highest standards of ethics.

Curtiss-Wright is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your supervisor or management in instances where you believe violations of policies or standards have occurred.

In situations where you prefer to place an anonymous report in confidence, you are encouraged to use this hotline, hosted by a third party hotline provider, EthicsPoint. You are encouraged to submit reports relating to violations stated in our written standards and policies, as well as asking for guidance related to policies and procedure and providing positive suggestions and stories.

The information you provide will be sent to us by EthicsPoint on a totally confidential and anonymous basis if you should choose. You have our guarantee that your comments will be heard.

[12] EthicsPoint FAQs (Document)

Accessed 24/10/2019

<https://secure.ethicspoint.com/domain/media/en/gui/42903/faq.pdf>

[p. 2] Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

[p. 5] What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

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| Question |
| 2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations? |
| Score |
| 0 |
| Comments |
| <p>There is some evidence that the company takes steps to ensure the quality of its internal investigations, including those reported through whistleblowing channels. The company states that representatives from the Legal Department are responsible for receiving internal reports and that EthicsPoint representatives who receive allegations through the third-party hotline are properly trained.</p> <p>However, the company receives a score of '0' because there is no evidence that it has procedures in place to receive, handle and escalate, if necessary, complaints about the investigation process. There is also evidence that individuals outside the Legal Department that might be involved in investigations and properly trained, nor is there evidence that the company reviews its investigations procedure at least every three years or in response to any changes in the regulatory environment.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 22] ... If you call the Curtiss-Wright Hotline, a trained representative will speak with you about the matter and will write down the points made during the telephone call. If you prefer to speak to the representative in a language other than English, an interpreter will be made available.</p> <p>[p. 23] Allegations will be investigated at the direction of the Legal Department by the proper corporate, business unit or department personnel. Our investigations are impartial, objective, thorough, and timely.</p> <p>[12] EthicsPoint FAQs (Document) Accessed 24/10/2019 https://secure.ethicspoint.com/domain/media/en/gui/42903/faq.pdf [p. 1] Where do these reports go? Who can access them?</p> <p>Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.</p> |

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| Question |
| 2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities? |
| Score |
| 0 |
| Comments |
| <p>There is no clear evidence that the company commits to report material findings of bribery or corruption from investigations to the Board of Directors and, if necessary, to the relevant authorities. The company states that Directors must report any violations to the Chairman of the board-level Committee on Directors and Governance, however it is not clear that this applies to employees at other levels involved in handling investigations. The company also states that violations may be reported to government authorities, but there is no evidence that a specific senior individual has responsibility for ensuring this disclosure.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 5] Failure to comply with this Code, Curtiss-Wright policies, and applicable laws, rules, and regulations can have severe consequences for both the individuals involved and Curtiss-Wright, including disciplinary action, civil penalties or criminal prosecution under certain circumstances.</p> <p>[p. 17] Curtiss-Wright employees have a duty to cooperate with requests for information when such requests are received from Curtiss-Wright management or auditors or when legitimate requests for information are received by Curtiss-Wright from governmental authorities. No Curtiss-Wright employee shall falsify, destroy or conceal documents when such documents have been requested. In addition, no Curtiss-Wright employee shall make false or misleading statements or withhold information from management, auditors, or government investigators or officials. Any employee who becomes aware of such conduct shall report it to the Office of the General Counsel.</p> <p>It is our policy to cooperate with any reasonable request of government investigators at any level and in any of our locations. At the same time, Curtiss-Wright employees are entitled to the safeguards provided by applicable law, which may include the representation of counsel when investigators are seeking information concerning Curtiss-Wright operations for enforcement or ...</p> <p>[p. 18] ...investigatory purposes. To enable Curtiss-Wright to respond appropriately, any representative of any government agency who requests to interview an employee or seeks Curtiss-Wright data, copies of Curtiss-Wright documents or access to Curtiss-Wright files should be referred to the Office of the General Counsel. In addition, any employee that receives notice of a governmental investigation involving Curtiss-Wright must contact the Office of the General Counsel immediately.</p> <p>[p. 23] Failure to comply with the Code of Conduct may result in disciplinary action, up to and including termination, as appropriate, and may also require restitution or reimbursement from the employee and referral of the matter to government authorities under the guidance of the Law Department. Discipline may also be imposed for conduct that is considered unethical or improper even if the conduct is not specifically covered by this Code.</p> <p>[02] Corporate Governance Guidelines (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/corporate-governance-guidelines/default.aspx [p. 8] J. Compliance Procedures Directors shall communicate any suspected violations of this Code, including any violation of law or governmental rule or regulation, promptly to the Chairman of the Committee on Directors and Governance (or in the case of an issue involving the Chairman of the Committee on Directors and Governance, the members of the Committee on Directors and Governance). Alleged violations shall be investigated by the Committee on Directors and Governance or by a person or persons designated by the Committee on Directors and Governance and appropriate action shall be taken in the event of any violations of the Code.</p> |

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| Question |
| 2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes data on ethical or bribery and corruption-related investigations or disciplinary actions. |
| Evidence |
| No evidence found. |

3. Support to Employees

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| Question |
| 3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages? |
| Score |
| 1 |
| Comments |
| <p>There is evidence that the company provides training to its employees on the Code of Conduct, which includes the company’s anti-bribery and corruption policy and the whistleblowing options available to employees. The company states that this training is provided on an annual basis to all employees across the organisation.</p> <p>However, the company receives a score of ‘1’ because it is not clear that training is provided to all employees across all divisions and regions of operation or in all appropriate languages. Although the company states that the Code of Conduct is available to employees in all divisions and regions, it is not clear from publicly available evidence that this applies to training.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 5] All Representatives of Curtiss-Wright are responsible for complying with all applicable laws, rules, regulations, Curtiss-Wright policies, and this Code of Conduct (this “Code”). The code of conduct applicable to members of Curtiss-Wright’s Board of Directors is set forth in the Corporate Governance Guidelines, which are available on Curtiss-Wright’s website and from Curtiss- Wright’s Law Department.</p> <p>The policies in this Code apply across Curtiss-Wright, in all businesses, countries, and regions, unless otherwise specifically noted. It covers all Representatives of Curtiss-Wright.</p> <p>[p. 11] 2. Curtiss-Wright will provide training and educational materials, including this Code and various legal and other compliance materials, so that we are informed of Curtiss-Wright’s ethical standards and our requirement to comply with all laws and Company policies.</p> <p>[p. 23] All non-hourly Employees must complete an annual certification that they have read the Code and certify as to knowledge of actual or apparent violations of this Code. Copies of the Certification will be distributed once a year to each such employee. Failure to read the Code or sign the certification does not excuse an employee from compliance with the Code.</p> <p>[06] Corporate Social Responsibility (Document) Accessed 06/07/2019 https://www.curtisswright.com/investors/corporate-governance/Corporate-Social-Responsibility/default.aspx [p. 3] Training All employees receive annual training on the Code of Conduct, Ethics, Harassment, and Import / Export Control. Automated systems ensure compliance and employee participation and completion.</p> |

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| Question |
| <p>3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees:</p> <ul style="list-style-type: none"> a) Employees in high risk positions, b) Middle management, c) Board members. |
| Score |
| 0 |
| Comments |
| <p>There is no evidence that the company tailors its anti-bribery and corruption training to employees based on an assessment of their role and exposure to corruption risk. Although the company provides a dedicated Code of Conduct for board members, this document does not mention a requirement to undergo training on anti-bribery and corruption.</p> |
| Evidence |
| <p>No evidence found.</p> |

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| Question |
| 3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company measures or reviews the efficacy of its anti-bribery and corruption communications or training programme. |
| Evidence |
| No evidence found. |

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| Question |
| 3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company's incentive schemes incorporate ethical or anti-bribery and corruption principles. |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 5] All executive officers, managers, and supervisors, including the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, and Corporate Controller, have leadership responsibilities that include creating a culture of ethical business conduct and commitment to compliance, maintaining a work environment that encourages employees to raise concerns, and promptly addressing compliance concerns.</p> <p>[p. 11] To help us meet our ethical obligations, Curtiss-Wright will maintain a workplace environment that does not create pressures that would encourage any departure from ethical behavior or acceptable standards of conduct.</p> |

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| Question |
| 3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company commits to support or protect employees who refuse to act unethically. The company states its intention to create an ethical workplace but does not provide sufficiently clear evidence that it will support and protect those who refuse to act unethically, even where it might result in a disadvantage or loss of business. |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 5] All executive officers, managers, and supervisors, including the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, and Corporate Controller, have leadership responsibilities that include creating a culture of ethical business conduct and commitment to compliance, maintaining a work environment that encourages employees to raise concerns, and promptly addressing compliance concerns.</p> <p>[p. 11] To help us meet our ethical obligations, Curtiss-Wright will maintain a workplace environment that does not create pressures that would encourage any departure from ethical behavior or acceptable standards of conduct.</p> |

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| Question |
| 3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents? |
| Score |
| 0 |
| Comments |
| <p>There is evidence that the company promotes a policy of non-retaliation against both whistleblowers and employees who report bribery and corruption incidents. There is evidence that this policy applies to employees and representatives associated with the company, which is understood to include third parties and those employed by joint ventures.</p> <p>However, the company receives a score of '0' because it is not clear whether this Code applies to those engaged by the group as suppliers, and there is no mention of non-retaliation in the Code of Conduct for Suppliers and Customers. There is also no evidence that the company assures itself of its employees' confidence in this commitment through surveys, usage data, or other clearly stated means.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 1] Curtiss-Wright Corporation and its subsidiaries (collectively, "Curtiss-Wright") operate their worldwide businesses in accordance with the highest ethical standards and relevant laws. Curtiss-Wright places the highest value on the integrity of each of its employees, officers, consultants, agents, and contractors (collectively, "Representatives"). All Representatives of Curtiss-Wright are responsible for complying with all applicable laws, rules, regulations, Curtiss-Wright policies, and this Code of Conduct (this "Code"). The code of conduct applicable to members of Curtiss-Wright's Board of Directors is set forth in the Corporate Governance Guidelines, which are available on Curtiss-Wright's website and from Curtiss- Wright's Law Department. Curtiss-Wright's corporate culture demands not only legal compliance, but also responsible and ethical behavior. Failure to comply with this Code, Curtiss-Wright policies, and applicable laws, rules, and regulations can have severe consequences for both the individuals involved and Curtiss-Wright, including disciplinary action, civil penalties or criminal prosecution under certain circumstances.</p> <p>All executive officers, managers, and supervisors, including the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, and Corporate Controller, have leadership responsibilities that include creating a culture of ethical business conduct and commitment to compliance, maintaining a work environment that encourages employees to raise concerns, and promptly addressing compliance concerns.</p> <p>The policies in this Code apply across Curtiss-Wright, in all businesses, countries, and regions, unless otherwise specifically noted. It covers all Representatives of Curtiss-Wright.</p> <p>[p. 22] Any employee who in good faith raises an issue regarding a possible violation of law or Curtiss- Wright policy will not be subject to retaliation and their confidentiality will be protected to the extent possible, consistent with law and corporate policy and the requirements necessary to conduct an effective investigation. However, anyone who provides false, misleading, frivolous or malicious information may be subject to disciplinary action up to and including termination of employment.</p> <p>[04] Code of Conduct – Suppliers and Customers (Document) Accessed 06/07/2019 https://www.curtisswright.com/investors/corporate-governance/Code-of-Conduct--Suppliers-and-Customers/ Each supplier and customer shall comply with the letter and spirit of this Code of Conduct, and shall communicate any suspected violations promptly. Violations are to be reported by calling the Code of Conduct Helpline (1-800-554-7109 in the United States; or 08- 000280394 in the United Kingdom; or 0800-561119 in Switzerland; or 10-800-712-2380 in Northern China and 10-800-120-2380 in Southern China).</p> |

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| Question |
| 3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting? |
| Score |
| 2 |
| Comments |
| <p>There is evidence that the company has multiple channels to report instances of suspected corrupt activity and seek advice on the company's anti-bribery and corruption programme. Channels are sufficiently varied to allow the employee to raise concerns across the management chain and to an independent third party, through an externally-operated hotline. These channels allow for confidential and, wherever possible, anonymous reporting. There is evidence that the EthicsPoint hotline is available to all employees in all jurisdictions – including those employed by the group as third parties, suppliers and joint venture partners – and in all relevant languages.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx</p> <p>[p. 1] If you are faced with a situation where you think Curtiss-Wright's values or compliance with the law may be in question, you should bring this to the attention of your supervisor. If you would prefer to report the matter to someone other than your supervisor, contact your Human Resources representative, Curtiss-Wright's Legal Department, the Curtiss-Wright Hotline at (844) 286-0072, or make a report online at www.curtisswright.ethicspoint.com. For international dialing instructions, go to www.curtisswright.ethicspoint.com. You may report anonymously if you are unwilling to provide your name.</p> <p>[p. 5] Curtiss-Wright Corporation and its subsidiaries (collectively, "Curtiss-Wright") operate their worldwide businesses in accordance with the highest ethical standards and relevant laws. Curtiss-Wright places the highest value on the integrity of each of its employees, officers, consultants, agents, and contractors (collectively, "Representatives"). All Representatives of Curtiss-Wright are responsible for complying with all applicable laws, rules, regulations, Curtiss-Wright policies, and this Code of Conduct (this "Code"). The code of conduct applicable to members of Curtiss-Wright's Board of Directors is set forth in the Corporate Governance Guidelines, which are available on Curtiss-Wright's website and from Curtiss-Wright's Law Department. Curtiss-Wright's corporate culture demands not only legal compliance, but also responsible and ethical behavior. Failure to comply with this Code, Curtiss-Wright policies, and applicable laws, rules, and regulations can have severe consequences for both the individuals involved and Curtiss-Wright, including disciplinary action, civil penalties or criminal prosecution under certain circumstances.</p> <p>All executive officers, managers, and supervisors, including the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, and Corporate Controller, have leadership responsibilities that include creating a culture of ethical business conduct and commitment to compliance, maintaining a work environment that encourages employees to raise concerns, and promptly addressing compliance concerns.</p> <p>The policies in this Code apply across Curtiss-Wright, in all businesses, countries, and regions, unless otherwise specifically noted. It covers all Representatives of Curtiss-Wright.</p> <p>[p. 11] Curtiss-Wright will provide the channels through which we are able to report suspected violations of our Code or other Company policy.</p> <p>To the extent possible, Curtiss-Wright will maintain the confidentiality of our communications about suspected violations that are made in good faith, except where law or policy may require disclosure.</p> <p>[p. 17] Curtiss-Wright employees have a duty to cooperate with requests for information when such requests are received from Curtiss-Wright management or auditors or when legitimate requests for information are received by Curtiss-Wright from governmental authorities. No Curtiss-Wright employee shall falsify, destroy or conceal documents when such documents have been requested. In addition, no Curtiss-Wright employee shall make false or misleading statements or withhold information from management, auditors, or government investigators or officials. Any employee who becomes aware of such conduct shall report it to the Office of the General Counsel.</p> |

[p. 22] Employees shall report violations or possible violations of laws, regulations, company policies or this Code of Conduct to their supervisor. If you would prefer to report the matter to someone other than your supervisor, contact your Human Resources representative, Curtiss-Wright's Legal Department, the Curtiss-Wright Hotline at (844) 286-0072, or make a report online at www.curtisswright.ethicspoint.com. For international dialing instructions, go to the URL address listed in the previous sentence. You may also report a violation or possible violation by using the Certification at the end of this Code. Employees may report anonymously if they are unwilling to provide their name. (Reporting anonymously makes the investigation of allegations more difficult, since there is no ability to follow up with the employee to obtain additional detail and that the credibility of such reports may be more difficult to determine). If an employee provides his or her identity when making a report, Curtiss-Wright, to the extent permitted by law and consistent with the fair and uniform enforcement of this Code, will endeavor to keep confidential the identity of anyone who reports a suspected violation in good faith. To ensure strict confidentiality of suspected violations reported, the Curtiss-Wright Hotline is hosted and administered by an independent third party service provider, EthicsPoint. The Curtiss-Wright Hotline is available 24 hours a day, 365 days a year. If you call the Curtiss-Wright Hotline, a trained representative will speak with you about the matter and will write down the points made during the telephone call. If you prefer to speak to the representative in a language other than English, an interpreter will be made available. After the telephone call is finished, a written report will be sent by the Curtiss-Wright Hotline representative to the Curtiss-Wright Legal Department for investigation, preserving the anonymity of those who request it. Online reports are entered by employees directly on the EthicsPoint secure server at www.curtisswright.ethicspoint.com.

Reports made in or about a person in a member state of the European Union must comply with the data privacy laws of the EU and the member state. The reported topics must be related to the international fight against bribery, auditing and accounting, banking, or financial crime. If your concern pertains to other types of non-compliance issues, you are encouraged to report them to the HR Director for Europe at +44 1202 034230 or email at UKHRHelpdesk@one.curtisswright.com. If you would prefer to report the matter to someone else, contact the Office of the General Counsel at 1-973-541-3756. Anonymous reporting is discouraged. Reports will be processed in accordance with the laws of the member state."

[04] Code of Conduct – Suppliers and Customers (Document)

Accessed 06/07/2019

<https://www.curtisswright.com/investors/corporate-governance/Code-of-Conduct--Suppliers-and-Customers/>

[p. 4] Responsibilities of All Employees

Each supplier and customer shall comply with the letter and spirit of this Code of Conduct, and shall communicate any suspected violations promptly. Violations are to be reported by calling the Code of Conduct Helpline (1-800-554-7109 in the United States; or 08- 000280394 in the United Kingdom; or 0800-561119 in Switzerland; or 10-800-712-2380 in Northern China and 10-800-120-2380 in Southern China).

[11] EthicsPoint – Curtiss-Wright Corporation (Webpage)

Accessed 24/10/2019

<https://secure.ethicspoint.com/domain/media/en/gui/42903/index.html>

OUR COMMITMENT

Curtiss-Wright is an organization with strong values of responsibility and integrity. Our written standards and policies contain general guidelines for conducting business with the highest standards of ethics.

Curtiss-Wright is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your supervisor or management in instances where you believe violations of policies or standards have occurred.

In situations where you prefer to place an anonymous report in confidence, you are encouraged to use this hotline, hosted by a third party hotline provider, EthicsPoint. You are encouraged to submit reports relating to violations stated in our written standards and policies, as well as asking for guidance related to policies and procedure and providing positive suggestions and stories.

The information you provide will be sent to us by EthicsPoint on a totally confidential and anonymous basis if you should choose. You have our guarantee that your comments will be heard.

See the EthicsPoint FAQs for more information.

TO MAKE A REPORT

https://secure.ethicspoint.com/domain/media/en/gui/42903/code.pdf

Deutsch English Español Français 汉语[S]

HICS
FAQS

ATTENTION! This webpage is hosted on EthicsPoint's secure servers and is not part of the Curtiss-Wright Corporation website or intranet.

TO MAKE A REPORT

Select the country in which you are located.

✓ - Select -
⌵

- Belgium
- Brazil
- Canada
- China
- Costa Rica
- France
- Germany
- India
- Ireland
- Korea
- Mexico
- Netherlands
- Poland
- Portugal
- Singapore
- Spain
- Sweden
- Switzerland
- Taiwan
- UK
- United States

After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After 5-6 business days, use your report key and password to check your report for feedback or questions.

For Individuals in the European Union:

The Hotline only allows you to report concerns related to financial, accounting or auditing irregularities, fraud, bribery or anti-corruption.

If your concern pertains to other types of non-compliance issues, you are encouraged to report them to the HR Director for Europe at +44 1202 034230 or email at UKHRHelpdesk@one.curtisswright.com. If you would prefer to report the matter to someone else, contact the Office of the General Counsel at 1-973-541-3756.

[12] EthicsPoint FAQs (Document)
 Accessed 24/10/2019
<https://secure.ethicspoint.com/domain/media/en/gui/42903/faq.pdf>

[p. 2] If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged with

evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

[p. 4] Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity. If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity. I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

[p. 5] What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

[p. 6] Can I still file a report if I don't have access to the Internet?

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.

4. Conflict of Interest

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| Question |
| 4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members? |
| Score |
| 2 |
| Comments |
| <p>There is evidence that the company formally addresses conflict of interest as a corruption risk, and that it has a policy that defines conflicts of interest, including actual, potential and perceived conflicts. The policy explicitly covers all the categories of possible conflicts listed in the question guidance. The company states that this policy applies to all employees and board members, including those of subsidiaries.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx</p> <p>[p. 5] Curtiss-Wright Corporation and its subsidiaries (collectively, “Curtiss-Wright”) operate their worldwide businesses in accordance with the highest ethical standards and relevant laws. Curtiss-Wright places the highest value on the integrity of each of its employees, officers, consultants, agents, and contractors (collectively, “Representatives”). All Representatives of Curtiss-Wright are responsible for complying with all applicable laws, rules, regulations, Curtiss-Wright policies, and this Code of Conduct (this “Code”). The code of conduct applicable to members of Curtiss-Wright’s Board of Directors is set forth in the Corporate Governance Guidelines, which are available on Curtiss-Wright’s website and from Curtiss- Wright’s Law Department. Curtiss-Wright’s corporate culture demands not only legal compliance, but also responsible and ethical behavior. Failure to comply with this Code, Curtiss-Wright policies, and applicable laws, rules, and regulations can have severe consequences for both the individuals involved and Curtiss-Wright, including disciplinary action, civil penalties or criminal prosecution under certain circumstances.</p> <p>All executive officers, managers, and supervisors, including the Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, and Corporate Controller, have leadership responsibilities that include creating a culture of ethical business conduct and commitment to compliance, maintaining a work environment that encourages employees to raise concerns, and promptly addressing compliance concerns.</p> <p>The policies in this Code apply across Curtiss-Wright, in all businesses, countries, and regions, unless otherwise specifically noted. It covers all Representatives of Curtiss-Wright.</p> <p>[p. 9] Several governments, including the U.S., impose restrictions on the hiring of some government employees. Some of these restrictions may involve the ability of former senior government procurement officials from accepting positions with companies for which they had some oversight during their government tenure. Other restrictions prohibit former senior government officials from having direct contact with their former offices for some period of time. Managers must be aware of and comply with these conflict of interest laws and regulations covering government procurements, including circumstances under which current or former government employees may be offered, or can accept, employment with Curtiss-Wright.</p> <p>[p. 12] We and our immediate families will avoid any situation that may create, seem to create, or be perceived to create a conflict between our personal interests and the interests of Curtiss-Wright.</p> <p>A conflict, or appearance of a conflict, might arise, for example, by accepting a gift from a current or potential customer, supplier or competitor; owning a financial interest (other than shareholdings in a publicly traded company) in, or serving in a business capacity with, an outside enterprise that does or wishes to do business with, or is a competitor of, Curtiss-Wright; serving as an intermediary for the benefit of a third party in transactions involving Curtiss-Wright; using confidential Company information or other corporate assets for personal profit, conducting business for another enterprise during our normal working hours or using Company property to conduct business for another enterprise.</p> |

We will take necessary steps to avoid improper reporting relationships and not directly or indirectly supervise or report to persons with whom we have a family or a close personal relationship.

If a conflict of interest or appearance of a conflict of interest develops, the employee should disclose the issue to a member of the leadership team related to the business in which the conflict arises for review with the Law Department and appropriate action, if necessary.

[p. 17] Curtiss-Wright expects each employee to be fully attentive to the interests of Curtiss-Wright at all times. Accordingly, no employee may engage in any activity, including outside employment, which places his or her interest, or the interest of other persons or groups, ahead of the best interests of Curtiss-Wright. Outside employment or other interests that could detract from an employee's work performance must be approved in advance by the employee's supervisor. Under no circumstances may an employee compete against Curtiss-Wright.

[p. 20] When it is necessary to engage the services of an individual or firm to consult for or otherwise represent Curtiss-Wright, special consideration must be given to avoid any situation that may create, or appear to create, a conflict of interest between Curtiss-Wright and the person or firm employed.

[02] Corporate Governance Guidelines (Document)

Accessed 05/07/2019

<https://www.curtisswright.com/investors/corporate-governance/corporate-governance-guidelines/default.aspx>

[p. 5] Directors must avoid any conflicts of interest between themselves and the Company. If a Director believes that the Director has an actual or potential conflict of interest with the Company, the Director shall notify the Chairman of the Committee on Directors and Governance (or in the case of an issue involving the Chairman of the Committee on Directors and Governance, the members of the Committee on Directors and Governance) as promptly as practicable and shall not participate in any decision by the Board that in any way relates to the matter that gives rise to the conflict of interest.

A "conflict of interest" can occur when a Director's personal interest interferes in any way – or even appears to interfere with – the interests of the Company. A conflict situation can arise when a Director takes actions or has interests that may make it difficult to perform his or her work as a Director objectively and effectively. Conflicts of interest also arise when a Director, or a member of his or her immediate family, receives improper personal benefits as a result of his or her position as a Director. "Immediate family" includes a Director's spouse, parents, children, siblings, mothers-in-law and fathers-in-law, sons and daughters-in-law, brothers and sisters-in-law, and anyone (other than domestic employees) who shares such Director's home.

In situations where a Director may not be certain whether a particular situation raises a potential conflict with the Company's interests, the Director should consult with the General Counsel to obtain information necessary to make a determination. For example, the Director may not know whether a company with which he or she has a relationship is a potential customer, vendor or competitor of the Company. The following are examples of situations that may give rise to a conflict of interest.

- A Director has an investment in an actual or potential customer, vendor or competitor of the Company. If there is such an investment, the Director must disclose the investment to the Chairman of the Committee on Directors and Governance, who will then determine whether any action, such as recusal of the Director from Board actions

[p. 6]

- relating to the investment subject, is appropriate. Directors are not required to report their holdings of less than two percent of the stock of publicly traded companies.
- A Director lends money to, or borrows money from, an actual or potential customer, vendor or competitor of the Company, other than a bank or financial institution.
- A Director uses the Company's resources or his or her position to advance his or her financial or personal interests.
- A Director seeks or accepts any compensation that is or may be interpreted as having been offered in an attempt to influence the conduct or actions of the Director. The acceptance of advertising novelties, occasional business meals, or the exchange of gifts solely because of family or social relationships need not be reported.
- A Director or a firm of which a Director is a partner or shareholder furnishes any services to the Company or any actual or potential customer, vendor or competitor, whether or not the Director is paid for such services.

- A Director directly or on behalf of another deals in products or services that are or that might reasonably be expected to be, purchased, produced, furnished, utilized or sold by the Company, other than routine consumer transactions in goods or services under terms and conditions generally offered to the public or through the ownership of the stock of companies involved in such transactions.”
- A Director represents the Company in any transaction in which he or she knows that a relative has a significant interest.

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| Question |
| 4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases? |
| Score |
| 1 |
| Comments |
| <p>There is evidence that the company has procedures to identify, declare and manage conflicts of interest, including actual, potential and perceived conflicts. The company’s Code of Conduct describes potential punitive measures for breaches of the Code as a whole, which includes its policy on conflicts of interest.</p> <p>However, the company receives a score of ‘1’ because there is no evidence that all employee and board member declarations are held in a dedicated central register that is accessible to those responsible for oversight of the process and the policy does not provide examples of criteria for recusals.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 1] We have zero tolerance for any violation of the provisions of the Code.</p> <p>[p. 5] Failure to comply with this Code, Curtiss-Wright policies, and applicable laws, rules, and regulations can have severe consequences for both the individuals involved and Curtiss-Wright, including disciplinary action, civil penalties or criminal prosecution under certain circumstances.</p> <p>[p. 12] If a conflict of interest or appearance of a conflict of interest develops, the employee should disclose the issue to a member of the leadership team related to the business in which the conflict arises for review with the Law Department and appropriate action, if necessary.</p> <p>[p. 17] Curtiss-Wright expects each employee to be fully attentive to the interests of Curtiss-Wright at all times. Accordingly, no employee may engage in any activity, including outside employment, which places his or her interest, or the interest of other persons or groups, ahead of the best interests of Curtiss-Wright. Outside employment or other interests that could detract from an employee’s work performance must be approved in advance by the employee’s supervisor. Under no circumstances may an employee compete against Curtiss-Wright.</p> <p>[p. 20] When it is necessary to engage the services of an individual or firm to consult for or otherwise represent Curtiss-Wright, special consideration must be given to avoid any situation that may create, or appear to create, a conflict of interest between Curtiss-Wright and the person or firm employed.</p> <p>Curtiss-Wright will enter into representation or consultant agreements only with companies or individuals that have a demonstrated record of and commitment to the highest ethical standards. Efforts will be taken by Curtiss-Wright to ensure that agents, consultants, and representatives are aware of this Code and agree to abide by it.</p> <p>Curtiss-Wright will seek to inform our agents, consultants, and representatives of their responsibility to act in behalf of Curtiss-Wright consistent with the Code, other applicable Curtiss- Wright policies, and any applicable law or regulation. Specifically, sales agents must comply with Policy No. 11, Anti-Bribery, found along with the other Curtiss-Wright corporate policies at https://www.mycurtisswright.com/.</p> <p>[p. 23] 8. Curtiss-Wright does not expect to grant waivers or exceptions to this Code except under very limited circumstances where it is determined that doing so is in the Curtiss-Wright’s best interests and the matter does not involve any violations of applicable law or Curtiss-Wright’s ethical standards. Only Curtiss-Wright’s Board of Directors may grant a waiver or exception when a waiver involves executive officers, and the Board will promptly disclose it in accordance with stock exchange rules and requirements.</p> <p>9. Failure to comply with the Code of Conduct may result in disciplinary action, up to and including termination, as appropriate, and may also require restitution or reimbursement from the employee and referral of the matter to</p> |

government authorities under the guidance of the Law Department. Discipline may also be imposed for conduct that is considered unethical or improper even if the conduct is not specifically covered by this Code.

[02] Corporate Governance Guidelines (Document)

Accessed 05/07/2019

<https://www.curtisswright.com/investors/corporate-governance/corporate-governance-guidelines/default.aspx>

[p. 5] Directors must avoid any conflicts of interest between themselves and the Company. If a Director believes that the Director has an actual or potential conflict of interest with the Company, the Director shall notify the Chairman of the Committee on Directors and Governance (or in the case of an issue involving the Chairman of the Committee on Directors and Governance, the members of the Committee on Directors and Governance) as promptly as practicable and shall not participate in any decision by the Board that in any way relates to the matter that gives rise to the conflict of interest.

In situations where a Director may not be certain whether a particular situation raises a potential conflict with the Company's interests, the Director should consult with the General Counsel to obtain information necessary to make a determination. For example, the Director may not know whether a company with which he or she has a relationship is a potential customer, vendor or competitor of the Company. The following are examples of situations that may give rise to a conflict of interest.

[p. 8] Alleged violations shall be investigated by the Committee on Directors and Governance or by a person or persons designated by the Committee on Directors and Governance and appropriate action shall be taken in the event of any violations of the Code.

[...]

Waivers of this Code shall be granted only under exceptional circumstances. A waiver of this Code may be made only by the Board, and must be promptly disclosed in accordance with applicable law and the requirements of the New York Stock Exchange Corporate Governance Standards.

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| Question |
| 4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector? |
| Score |
| 1 |
| Comments |
| There is evidence that the company has a policy that addresses and acknowledges the risks associated with the employment of public officials. However, the company receives a score of '1' because this policy does not include specific controls to assess and regulate the potential risks associated with the employment of current or former public officials. |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 9] Several governments, including the U.S., impose restrictions on the hiring of some government employees. Some of these restrictions may involve the ability of former senior government procurement officials from accepting positions with companies for which they had some oversight during their government tenure. Other restrictions prohibit former senior government officials from having direct contact with their former offices for some period of time. Managers must be aware of and comply with these conflict of interest laws and regulations covering government procurements, including circumstances under which current or former government employees may be offered, or can accept, employment with Curtiss-Wright.</p> |

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| Question |
| 4.4. Does the company report details of the contracted services of serving politicians to the company? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company reports details of the contracted services of serving politicians. |
| Evidence |
| No evidence found. |

5. Customer Engagement

5.1 Contributions, Donations and Sponsorships

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| Question |
| 5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions? |
| Score |
| 0 |
| Comments |
| <p>There is evidence that the company generally prohibits corporate political contributions, however it does state that contributions may be permissible in certain circumstances, such as in support of local initiatives or referendums, providing that proper authorisation is given from individuals with legal expertise in the company. There is publicly available evidence that the company is associated with a Political Action Committee (PAC), however the company does not publish information about the PAC on its website.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 9] We will not give or encourage anyone else to give inducements of any kind to any government employee, or to any supplier under government or non-government contracts or subcontracts, in order to gain any business advantage or contract.</p> <p>[p. 19] Curtiss-Wright policy does not allow Curtiss-Wright funds to be used for political contributions, directly or indirectly, in support of any party or candidate in any election on the federal, state or local level.</p> <p>[p. 20] Wherever lawful, however, Curtiss-Wright may contribute to an occasional local initiative or referendum campaign where Curtiss-Wright’s interests are directly involved. Any such payments, however, require advance clearance from the Law Department.</p> <p>As interested citizens, Curtiss-Wright employees are free to make individual, personal contributions to candidates of their choice.</p> <p>[10] OpenSecrets – Curtiss-Wright Corp PAC Summary Page (Webpage) Accessed 23/10/2019 https://www.opensecrets.org/pacs/lookup2.php?cycle=2020&strID=C00420596</p> <p>Official PAC Name: CURTISS WRIGHT CORPORATION EMPLOYEES POLITICAL ACTION COMMITTEE Location: DAVIDSON, NC 28036 Industry: Air Transport; Aircraft parts & equipment Treasurer: OGILBY, GARY FEC Committee ID: C00420596 (Look up actual documents filed at the FEC)</p> |

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| Question |
| 5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company discloses details of any political contributions made, including those made under the exceptional circumstances described in its policy or those made by the Political Action Committee (PAC) with which the company is associated. |
| Evidence |
| No evidence found. |

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| Question |
| 5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries? |
| Score |
| 0 |
| Comments |
| <p>There is no evidence that the company has a policy that covers charitable donations or sponsorships. Based on publicly available information, the company does support charities and engage in sponsorships, however it is unclear whether there is a policy or procedure in place to ensure that such donations are not used as vehicles for bribery and corruption.</p> |
| Evidence |
| <p>[07] Corporate Social Responsibility (Document) Accessed 06/07/2019 https://www.curtisswright.com/investors/corporate-governance/Corporate-Social-Responsibility/default.aspx [p. 3] Corporate Philanthropy Curtiss-Wright applies its resources at the company level through two avenues:</p> <p>Charitable Contributions: Curtiss-Wright makes sizeable monetary donations annually to charities such as the United Services Organization (USO) as well as specific institutions dedicated to preserving the history of aviation, with which the Company is inexorably linked. Corporate Communications, in collaboration with senior management, determines how to deploy Curtiss-Wright resources with a focus on institutions supporting the Armed Forces, the aviation / aerospace industry, and the advancement of Science, Technology, Engineering, and Math (STEM) education.</p> <p>Sons and Daughters Scholarship Program: Curtiss-Wright strongly believes that cost should not prevent a student from gaining access to higher education. This program assists families of Curtiss-Wright employees by providing employees' dependent children the opportunity to apply for annual scholarships to offset educational costs. Selection is based on academic and demonstrated leadership qualifications. The program is administered by an independent third party and at no time does any officer or employee of Curtiss-Wright play a part in the selection. Up to 90 scholarships are awarded annually.</p> <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 21] Curtiss-Wright will comply with laws that prohibit a wide variety of activities associated with organized foreign economic boycotts, including: refusing to do business with boycotted countries, their nationals or blacklisted companies; furnishing information about the Curtiss-Wright's or any person's past, present or prospective relationship with boycotted countries or blacklisted companies; furnishing information about any person's race, religion, sex, national origin, or membership in or support of charitable organizations supporting a boycotted country; discriminating against individuals or companies on the basis of race, religion, sex or national origin; and paying, honoring or confirming letters of credit containing prohibited boycott provisions.</p> |

5.2 Lobbying

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| Question |
| 5.2.1 Does the company have a policy and/or procedure covering responsible lobbying? |
| Score |
| 0 |
| Comments |
| <p>There is no publicly available evidence that the company has a policy on lobbying. In its Code of Conduct, the company states that its lobbying activities are governed by federal and state legislation and are overseen by the Office of the General Counsel, however it does not provide any further details of specific values, behaviours and controls that constitute 'responsible' lobbying.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 19] B. We Comply with Lobbying Laws Federal and state laws govern Curtiss-Wright's political lobbying activities, and require that such activities and expenses be reported regularly and according to specific requirements. Accordingly, employees should coordinate all lobbying communications with the Office of the General Counsel.</p> |

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| Question |
| 5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes information on its lobbying aims, topics or activities. |
| Evidence |
| No evidence found. |

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| Question |
| 5.2.3 Does the company publish full details of its global lobbying expenditure? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company provides details about its lobbying expenditure. |
| Evidence |
| No evidence found. |

5.3 Gifts and Hospitality

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| Question |
| 5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption? |
| Score |
| 1 |
| Comments |
| <p>There is evidence that the company has a policy on the giving and receipt of gifts and hospitality, which outlines and places financial limits on the different types of promotional expense that employees may encounter. The company’s policy specifically recognises the risks associated with gifts and hospitality given to public officials in the U.S. and it is clear that this applies to all employees.</p> <p>However, the company receives a score of ‘1’ because there is no publicly available evidence that the company recognises the risks and has specific controls in place to cover promotional expenses given to or received from foreign public officials. There is also no evidence that all gifts and hospitality above a certain threshold are recorded in a central register that is accessible to those responsible for oversight of the process. The company appears to have a dedicated Gifts and Entertainment Policy, but this document is not publicly accessible.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 7] Curtiss-Wright imposes certain limitations on offering and giving existing or potential commercial customers gratuities and business courtesies so long as they are not provided for the purposes of obtaining or retaining business or some other commercial benefit. Please review Policy No. 39, Gift and Entertainment Policy, found along with the other Curtiss-Wright corporate policies at https://www.mycurtisswright.com/ for detailed guidance on offering and giving gratuities and business courtesies to existing or potential commercial customers.</p> <p>Where a customer or potential customer notifies Curtiss-Wright of a policy or preference in which it prohibits or limits gifts to the customer’s employees, Curtiss-Wright will respect such notification.</p> <p>[p. 8] Employees may not give U. S. Government employees anything of value. (Consult with the Law Department on rules for legislative branch employees). There are two exceptions to this prohibition: (1) Curtiss-Wright advertising or promotional items with a value of \$20.00 or less, such as golf balls, a sports shirt, a coffee mug, calendar, or similar item. (Value is measured by the cost to Curtiss-Wright or resale value, whichever is lower, recognizing that affixing the Curtiss-Wright or business unit logo to an item, such as a sports shirt or golf ball, may reduce the value of that item below its cost to Curtiss-Wright since there may be little retail value to an item bearing a company-specific logo. The determination of value should be made in good faith by the employee under the circumstances) (2) refreshments such as soft drinks, coffee, and donuts on an occasional basis in connection with business activities. (Note: Even though this policy may be more restrictive than the U.S. Government’s own policy with regard to federal Executive Branch employees, this policy shall govern the conduct of all Curtiss-Wright employees.) If a government agency, whether federal, state or local, has adopted a more stringent policy than Curtiss-Wright’s regarding gifts and gratuities, Curtiss-Wright employees and representatives...</p> <p>[p. 9] ...must comply with that more stringent policy. Please review Policy No. 39, Gift and Entertainment Policy, found along with the other Curtiss-Wright corporate policies at https://www.mycurtisswright.com/ for detailed guidance on offering and giving gratuities and business courtesies to U.S. Government employees.</p> <p>Employees should contact a member of the Law Department with questions and become familiar with Curtiss-Wright corporate policies that provide additional expectations in this area.</p> <p>The Foreign Corrupt Practices Act (“FCPA”) prohibits Curtiss-Wright from making a payment or giving a gift to a foreign government official, political party or candidate or public international organization (“foreign official”) for purposes of obtaining or retaining business. The FCPA applies to Curtiss-Wright everywhere in the world we do business. A violation occurs when a payment is made or promised to be made to a foreign official while knowing</p> |

that the payment will be used to unlawfully obtain or maintain business or direct business to anyone else. Employees should contact a member of the Law Department with questions.

[p. 10] All employees whose costs are allocated to government contracts or subcontracts must identify any expenses that are not allowable, paying special attention to such categories as alcohol, business meals and entertainment.

[p. 11] Curtiss-Wright imposes certain limitations on the receipt of gratuities and business courtesies from our suppliers or potential suppliers as they may be construed as an attempt to influence our business decisions. Please review Policy No. 39, Gift and Entertainment Policy, found along with the other Curtiss-Wright corporate policies at <https://www.mycurtisswright.com/> for detailed guidance on accepting gratuities and business courtesies.

[04] Code of Conduct – Suppliers and Customers (Document)

Accessed 06/07/2019

<https://www.curtisswright.com/investors/corporate-governance/Code-of-Conduct--Suppliers-and-Customers/>

[p. 2] We will not be influenced by gifts or favors of any kind from our suppliers or potential suppliers. Our businesses expect each employee to exercise reasonable judgment and discretion in accepting any gratuity or gift offered to the employee in connection with employment at one of our businesses.

6. Supply Chain Management

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| Question |
| 6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company requires the involvement of its procurement department in the establishment and oversight of its supplier base. |
| Evidence |
| No evidence found. |

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| Question |
| 6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company conducts anti-bribery and corruption due diligence on its supply chain. |
| Evidence |
| No evidence found. |

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| Question |
| 6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place? |
| Score |
| 1 |
| Comments |
| <p>There is some evidence that the company ensures that its suppliers have adequate anti-bribery and corruption policies and procedures in place. According to publicly available evidence, the company does this by requiring that its suppliers adopt its Code of Conduct for Suppliers and Customers, which specifically prohibits foreign and domestic bribery, gifts and conflicts of interest.</p> <p>However, the company receives a score of ‘1’ because there is no evidence that suppliers must have policies in place to prohibit facilitation payments or have systems in place to allow for whistleblowing. Furthermore, it is not clear how the company ensures these standards in practice or when this process is conducted throughout the business relationship.</p> |
| Evidence |
| <p>[06] Code of Conduct – Suppliers and Customers (Document) Accessed 06/07/2019 https://www.curtisswright.com/investors/corporate-governance/Code-of-Conduct--Suppliers-and-Customers/ [p. 1] Curtiss-Wright operates its worldwide business in accordance with the highest ethical standards and relevant laws. The Company places the highest value on the integrity of each of its suppliers and customers that wish to do business with Curtiss-Wright. All suppliers and customers of Curtiss-Wright are responsible for complying with all applicable laws, regulations and this Code of Conduct. Curtiss-Wright’s corporate culture demands not only legal compliance, but also responsible and ethical behaviour.</p> <p>Curtiss-Wright provides this Code of Conduct to its suppliers and customers worldwide for their guidance in recognizing and resolving properly the ethical and legal issues they encounter in conducting their business. In this Code of Conduct, the words “we” and “our” refer to Curtiss-Wright’s supplier(s) and customer(s).</p> <p>[...]</p> <p>Our businesses strictly prohibit bribes, kickbacks or any other form of improper payment, direct or indirect, to any representative of government, labor union, customer or supplier in order to obtain a contract, some other commercial benefit or government action. Our companies also strictly prohibit any employee from accepting such payments from anyone.</p> <p>[p. 2] In addition to the provisions of this Code, employees working with the U.S. government, state or local governments, or governments of those countries where we operate, have an additional obligation to know, understand and abide by the laws, regulations and ethical standards of those governments that may be more strict than those that apply to our non- government customers and suppliers.</p> <ul style="list-style-type: none"> • The Foreign Corrupt Practices Act (“FCPA”) prohibits our businesses from making a payment or giving a gift to a foreign government official, political party or candidate or public international organization (“foreign official”) for purposes of obtaining or retaining business. • In transactions involving the U.S. government, our businesses will adhere to the provisions of the Truth in Negotiations Act and we will make certain that cost and pricing data are current, accurate, complete, properly disclosed, documented and retained in appropriate files. <p>Our Relationship with our Suppliers</p> <p>We award business to our suppliers based on their ability to meet our needs and commitments, their reputations for service, integrity and compliance, their high standards for quality and delivery and their price structures.</p> <p>We Will Not Be Influenced by Gifts</p> |

We will not be influenced by gifts or favors of any kind from our suppliers or potential suppliers. Our businesses expect each employee to exercise reasonable judgment and discretion in accepting any gratuity or gift offered to the employee in connection with employment at one of our businesses.

[...]

We Avoid Conflicts of Interest

We will avoid any situation that may create, seem to create, or be perceived to create a conflict between our personal interests and the interests of our businesses.

[p. 4] Each supplier and customer shall comply with the letter and spirit of this Code of Conduct, and shall communicate any suspected violations promptly. Violations are to be reported by calling the Code of Conduct Helpline (1-800-554-7109 in the United States; or 08- 000280394 in the United Kingdom; or 0800-561119 in Switzerland; or 10-800-712-2380 in Northern China and 10-800-120-2380 in Southern China).

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| Question |
| 6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company takes steps to ensure that the substance of its anti-bribery and corruption programme and standards are required throughout the supply chain. |
| Evidence |
| No evidence found. |

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| Question |
| 6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes any data on ethical or anti-bribery and corruption-related investigations involving its suppliers, or the associated disciplinary actions. |
| Evidence |
| No evidence found. |

7. Agents, Intermediaries and Joint Ventures

7.1 Agents and Intermediaries

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| Question |
| 7.1.1 Does the company have a clear policy on the use of agents? |
| Score |
| 1 |
| Comments |
| <p>The company has a policy covering the use of agents and addresses some of the corruption risks associated with the use of agents (referred to as 'representatives'). There is evidence that this policy applies to all businesses within the organisation which might employ agents, including subsidiaries and joint ventures. However, the company receives a score of '1' because there is no evidence that the company commits to establishing and verifying that the use of agents is, in each case, necessary to perform a legitimate business function.</p> |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 5] Curtiss-Wright Corporation and its subsidiaries (collectively, "Curtiss-Wright") operate their worldwide businesses in accordance with the highest ethical standards and relevant laws. Curtiss-Wright places the highest value on the integrity of each of its employees, officers, consultants, agents, and contractors (collectively, "Representatives"). All Representatives of Curtiss-Wright are responsible for complying with all applicable laws, rules, regulations, Curtiss-Wright policies, and this Code of Conduct (this "Code").</p> <p>[...]</p> <p>The policies in this Code apply across Curtiss-Wright, in all businesses, countries, and regions, unless otherwise specifically noted. It covers all Representatives of Curtiss-Wright.</p> <p>[p. 20] When it is necessary to engage the services of an individual or firm to consult for or otherwise represent Curtiss-Wright, special consideration must be given to avoid any situation that may create, or appear to create, a conflict of interest between Curtiss-Wright and the person or firm employed.</p> <p>Curtiss-Wright will enter into representation or consultant agreements only with companies or individuals that have a demonstrated record of and commitment to the highest ethical standards. Efforts will be taken by Curtiss-Wright to ensure that agents, consultants, and representatives are aware of this Code and agree to abide by it.</p> <p>Curtiss-Wright will seek to inform our agents, consultants, and representatives of their responsibility to act in behalf of Curtiss-Wright consistent with the Code, other applicable Curtiss- Wright policies, and any applicable law or regulation. Specifically, sales agents must comply with Policy No. 11, Anti-Bribery, found along with the other Curtiss-Wright corporate policies at https://www.mycurtisswright.com/.</p> |

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| Question |
| 7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company states that it conducts anti-bribery and corruption due diligence on its agents or intermediaries. |
| Evidence |
| No evidence found. |

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| Question |
| 7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company aims to establish the beneficial ownership of its agents. |
| Evidence |
| No evidence found. |

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| Question |
| 7.1.4 Does the company’s anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities? |
| Score |
| 0 |
| Comments |
| There is evidence that the company’s Code of Conduct – which includes its anti-bribery and corruption policy – applies to agents and intermediaries. However, there is no evidence that agents and intermediaries are subject to anti-bribery and corruption clauses in their contracts which include audit and termination rights to detect, control and prevent breaches. |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 5] Curtiss-Wright Corporation and its subsidiaries (collectively, “Curtiss-Wright”) operate their worldwide businesses in accordance with the highest ethical standards and relevant laws. Curtiss-Wright places the highest value on the integrity of each of its employees, officers, consultants, agents, and contractors (collectively, “Representatives”). All Representatives of Curtiss-Wright are responsible for complying with all applicable laws, rules, regulations, Curtiss-Wright policies, and this Code of Conduct (this “Code”).</p> <p>[...]</p> <p>The policies in this Code apply across Curtiss-Wright, in all businesses, countries, and regions, unless otherwise specifically noted. It covers all Representatives of Curtiss-Wright.</p> |

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| Question |
| 7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company addresses incentive structures as a risk factor in agent behaviour, nor that incentive structures for agents are designed to minimise risks of anti-bribery and corruption. |
| Evidence |
| No evidence found. |

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| Question |
| 7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes any details of the agents currently contracted to act for or on behalf of the company. |
| Evidence |
| No evidence found. |

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| Question |
| 7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes any data on ethical or bribery and corruption-related investigations, incidents or the associated disciplinary actions involving agents. |
| Evidence |
| No evidence found. |

7.2 Joint Ventures

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| Question |
| 7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company conducts anti-bribery and corruption due diligence on its joint ventures. |
| Evidence |
| No evidence found. |

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| Question |
| 7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture partnerships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners? |
| Score |
| 0 |
| Comments |
| There is evidence that the company's Code of Conduct – which includes its anti-bribery and corruption policy – applies to all businesses and representatives, which is understood to include joint venture partnerships. However, there is no publicly available evidence to indicate that the company requires anti-bribery and corruption clauses in its contracts with joint venture partners, including audit and termination rights. |
| Evidence |
| <p>[01] Code of Conduct (Document) Accessed 05/07/2019 https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx [p. 5] Curtiss-Wright Corporation and its subsidiaries (collectively, “Curtiss-Wright”) operate their worldwide businesses in accordance with the highest ethical standards and relevant laws. Curtiss-Wright places the highest value on the integrity of each of its employees, officers, consultants, agents, and contractors (collectively, “Representatives”). All Representatives of Curtiss-Wright are responsible for complying with all applicable laws, rules, regulations, Curtiss-Wright policies, and this Code of Conduct (this “Code”).</p> <p>[...]</p> <p>The policies in this Code apply across Curtiss-Wright, in all businesses, countries, and regions, unless otherwise specifically noted. It covers all Representatives of Curtiss-Wright.</p> |

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| Question |
| 7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company commits to take an active role in preventing bribery and corruption in its joint ventures. |
| Evidence |
| No evidence found. |

8. Offsets

| |
|--|
| Question |
| 8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company addresses the corruption risks associated with offset contracting. |
| Evidence |
| No evidence found. |

| |
|--|
| Question |
| 8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on its offset obligations. |
| Evidence |
| No evidence found. |

| |
|--|
| Question |
| 8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf of the company's offset programme. |
| Evidence |
| No evidence found. |

| |
|---|
| Question |
| 8.4 Does the company publish details about the beneficiaries of its indirect offset projects? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes any details of its offset obligations and/or contracts. |
| Evidence |
| No evidence found. |

9. High Risk Markets

| |
|--|
| Question |
| 9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company acknowledges the corruption risks of operating in different markets, nor that risk assessment procedures are used to inform the company's operations in high risk markets. |
| Evidence |
| No evidence found. |

| |
|---|
| Question |
| 9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)? |
| Score |
| 0 |
| Comments |
| There is no evidence that the company publishes a list of subsidiaries or affiliated entities. |
| Evidence |
| No evidence found. |

Question

9.3 Does the company disclose its beneficial ownership and control structure?

Score

2

Comments

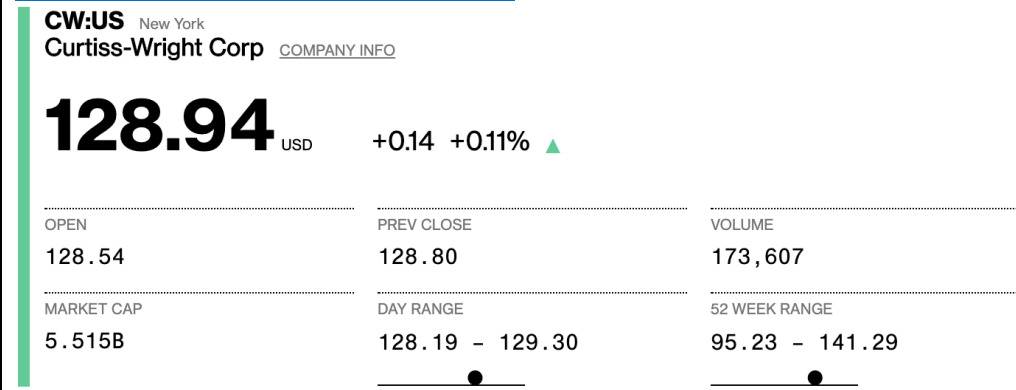
The company is a publicly listed company on the New York Stock Exchange and is therefore not required to disclose information about its beneficial ownership. The company is automatically awarded a score of '2'.

Evidence

[09] New York Stock Quote - Curtiss-Wright Corp (Webpage)

Accessed 27/07/2019

<https://www.bloomberg.com/quote/CW:US>



[03] 2019 Proxy Statement (Document)

Accessed 05/07/2019

https://s1.q4cdn.com/395056968/files/doc_financials/2018/CW-Proxy-2019-Final.pdf

[p. 49] Security Ownership of Certain Beneficial Owners and Management

The following table sets forth information as of February 18, 2019 for the beneficial ownership of common stock by (a) each stockholder who, to the Company's knowledge, is the beneficial owner of more than 5% of the outstanding shares of any class of Common Stock, (b) each current Director of the Company, (c) each nominee for election as a Director of the Company, (d) each of the executive officers of the Company named in the Summary Compensation Table above (the "Named Executive Officers"), and (e) all current Directors and executive officers of the Company as a group. The percentages in the third column are based on 42,848,732 shares of Common Stock issued and outstanding on February 18, 2019. In each case, except as otherwise indicated in the footnotes to the table, the shares shown in the second column are owned directly or indirectly by the individuals or members of the group named in the first column, with sole voting and dispositive power. For purposes of this table, beneficial ownership is determined in accordance with the federal securities laws and regulations. Inclusion in the table of shares not owned directly by the Director or Named Executive Officer does not constitute an admission that such shares are beneficially owned by the Director or Named Executive Officer for any other purpose.

| Name of Beneficial Owner | Number of Shares Beneficially Owned | Percentage of Class |
|--|-------------------------------------|---------------------|
| BlackRock, Inc. | 5,097,083 (a) | 11.9% |
| Singleton Group LLC | 3,762,960 (b) | 8.8% |
| The Vanguard Group | 3,643,153 (c) | 8.5% |
| David C. Adams | 103,164 (d)(e) | * |
| K. Christopher Farkas | 4,007 (d)(e) | * |
| Paul J. Ferdenzi | 26,765 (d)(e) | * |
| Dean M. Flatt | 8,454 (d)(g) | * |
| S. Marce Fuller | 12,472 (d)(g)(i) | * |
| Rita J. Heise | 4,669 (d)(f)(i)(j) | * |
| Bruce D. Hoechner | 887 (d)(f)(g) | * |
| Dr. Allen A. Kozinski | 18,876 (d)(f)(k) | * |
| Glenda J. Minor | -0- (d) | * |
| John B. Nathman | 6,567 (d)(f)(g) | * |
| Thomas P. Quinly | 73,259 (d)(e) | * |
| Robert J. Rivet | 7,388 (d)(g)(i) | * |
| Albert E. Smith | 22,431 (d)(f) | * |
| Glenn E. Tynan | 58,446 (d)(e) | * |
| Peter C. Wallace | 1,515 (d)(f)(g) | * |
| Directors and Executive Officers as a group (16 persons) | 370,402 (h) | * |

(a) Address is 40 East 52nd Street, New York, New York, 10022. The information as to the beneficial ownership of Common Stock by BlackRock, Inc. was obtained from Amendment No. 10, dated January 24, 2019, to its statement on Schedule 13G, filed with the Securities and Exchange Commission. Such report discloses that at December 31, 2018, BlackRock, Inc. possessed sole voting and sole dispositive power with respect to 4,894,108 and 5,097,083 shares of Common Stock, respectively.

(b) Address is 3419 Via Lido #630, Newport Beach, California, 92663. The information as to the beneficial ownership of Common Stock by Singleton Group LLC was obtained from Amendment No. 2, dated August 17, 2007, to its statement on Schedule 13D, filed with the Securities and Exchange Commission. Such report discloses that at August 17, 2007: (1) the Singleton Group LLC possessed shared voting and dispositive power with respect to 3,762,960 shares of Common Stock, (2) Christina Singleton Mednick possessed shared voting and dispositive power with respect to 3,762,960 shares of Common Stock, (3) William W. Singleton possessed shared voting and dispositive power with respect to 3,762,960 shares of Common Stock, and (4) Donald E. Rugg possessed shared voting and dispositive power with respect to 3,762,960 shares of Common Stock and sole voting and dispositive power with respect to 56 shares of Common Stock.

[p. 50]

(c) Address is 100 Vanguard Boulevard, Malvern, Pennsylvania 19355. The information as to the beneficial ownership of Common Stock by The Vanguard Group was obtained from Amendment No. 6, dated February 11, 2019, to its statement on Schedule 13G, filed with the Securities and Exchange Commission. Such report discloses that at December 31, 2018, The Vanguard Group: (1) possessed sole voting power with respect to 21,321 shares of Common Stock, (2) possessed sole dispositive power with respect to 3,620,582 shares of Common Stock, (3) possessed shared voting power with respect to 5,560 shares of Common Stock, and (4) possessed shared dispositive power with respect to 22,571 shares of Common Stock.

(d) Address is c/o Curtiss-Wright Corporation, 130 Harbour Place Drive, Davidson, North Carolina 28036.

(e) Includes shares of time-based restricted Common Stock owned by the Named Executive Officers as follows (and subject to forfeiture under the Company's 2005 Long-Term Incentive Plan and 2014 Omnibus Incentive Plan, as applicable) that vest on the third anniversary of the date of grant: David C. Adams, 16,015; K. Christopher Farkas, 1,287; Paul J. Ferdenzi, 2,934; Thomas P. Quinly, 35,4331; and Glenn E. Tynan, 5,527.

(f) Includes shares of restricted Common Stock owned by the Directors as follows (and subject to forfeiture under the Company's 2014 Omnibus Incentive Plan): Rita J. Heise, 2,363; Bruce D. Hoechner, 417; Allen A. Kozinski, 3,002; John B. Nathman, 1,077; Albert E. Smith, 3,002; and Peter C. Wallace, 1,515.

(g) Does not include shares of Common Stock granted to the Directors (under the Company's 2005 Stock Plan for Non-Employee Directors and 2014 Omnibus Incentive Plan, as applicable) that he or she has elected to defer receipt of until a later period as the Director neither has nor shares voting or investment power with respect to these shares and is not deemed the beneficial owner, as follows: Dean M. Flatt, 3,017; S. Marce Fuller, 18,697; Bruce D. Hoechner, 1,938; John B. Nathman, 1,940; Robert J. Rivet, 3,017; and Peter C. Wallace, 2,609.

(h) Includes shares of Common Stock as indicated in the preceding footnotes.

(i) Share total rounded down to the next whole number of shares respecting fractional shares purchased pursuant to a broker-dividend reinvestment plan.

(j) All of the shares held in Ms. Heise's revocable trust, over which Ms. Heise and her husband share voting and investment power.

(k) Includes 14,494 shares held in a revocable trust of Mr. Kozinski and his wife, over which Mr. Kozinski and his wife share voting and investment power.

Question

9.4 Does the company publish a percentage breakdown of its defence sales by customer?

Score

0

Comments

There is evidence that the company publishes the total value and percentage breakdown of sales by business segment, with reference to defence sales. The company also publishes that 34% of its net sales were derived from the U.S. Government. However, the company receives a score of '0' because it does not indicate the percentage breakdown of customers for the defence business segment specifically.

Evidence

[05] 2018 Annual Report (Document)
 Accessed 06/07/2019
https://s1.q4cdn.com/395056968/files/doc_financials/2018/CW-2018-Annual-Report-Final-w-10K.pdf

[p. 10]
Segment Financial Information

Years ended December 31 (Dollars in millions, except percentages; unaudited)

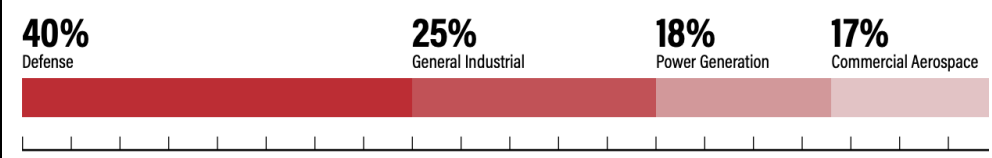
| Sales | 2018 | 2017 | Change |
|-----------------------|-------------------|-------------------|-----------|
| Commercial/Industrial | \$ 1,209.2 | \$ 1,162.7 | 4% |
| Defense | 554.4 | 555.5 | (0%) |
| Power | 648.3 | 552.9 | 17% |
| Total Sales | \$ 2,411.8 | \$ 2,271.0 | 6% |

| Operating Income (Expense) | 2018 | 2017 | Change |
|-------------------------------|-----------------|-----------------|-------------|
| Commercial/Industrial | \$ 182.7 | \$ 168.1 | 9% |
| Defense | 128.4 | 109.3 | 17% |
| Power | 98.9 | 81.1 | 22% |
| Total Segments | \$ 410.0 | \$ 358.6 | 14% |
| Corporate & Other | (36.3) | (33.5) | (9%) |
| Total Operating Income | \$ 373.6 | \$ 325.1 | 15% |

| Operating Margins | 2018 | 2017 |
|--------------------------------|--------------|--------------|
| Commercial/Industrial | 15.1% | 14.5% |
| Defense | 23.2% | 19.7% |
| Power | 15.2% | 14.7% |
| Segment Margins | 17.0% | 15.8% |
| Total Operating Margins | 15.5% | 14.3% |

Note: Amounts may not add to the total due to rounding.

End Market Sales



[p. 19] Defense
 Sales in the Defense segment are primarily to the defense markets and, to a lesser extent, to the commercial aerospace market. The businesses in this segment provide a diversified offering of products including: Commercial

Off-the-Shelf (COTS) embedded computing board-level modules, data acquisition and flight test instrumentation equipment, integrated subsystems, instrumentation and control systems, ...

[p. 20] ... turret aiming and stabilization products, and weapons handling systems. The businesses within our Defense segment are impacted primarily by government funding and spending, driven primarily by the U.S. Government. Our products typically support government entities in the aerospace defense, ground defense, and naval defense industries. As a result, we have varying degrees of content on most fighter jets, unmanned aerial vehicles (UAVs), helicopters, ground vehicle platforms, and naval vessels. Additionally, we provide avionics and electronics, flight test equipment, and aircraft data management solutions to the commercial aerospace market. Our defense businesses supporting government contractors typically utilize more advanced and ruggedized production and service processes compared to our commercial businesses and have more stringent specifications and performance requirements. The businesses in this segment typically market and distribute products through regulated government contracting channels.

[p. 20] In 2018, 2017, and 2016, our foreign operations as a percentage of pre-tax earnings were 39%, 40%, and 42%, respectively.

Government Sales

Our sales to the U.S. Government and foreign government end use represented 40%, 39%, and 38% of total net sales during 2018, 2017, and 2016, respectively.

[p. 21] Customers

We have hundreds of customers in the various industries we serve. No commercial customer accounted for more than 10% of our total sales during 2018, 2017, or 2016.

Approximately 34% of our total net sales for 2018, 33% for 2017, and 32% for 2016 were derived from contracts with agencies of, and prime contractors to, the U.S. Government.

[08] Curtiss-Wright Corporation News Release 08/05/2019 (Document)

Accessed 08/07/2019

[https://s1.q4cdn.com/395056968/files/doc_financials/2019/Q1/CW-1Q'19-EarningsPressRelease-Final-\(1\).pdf](https://s1.q4cdn.com/395056968/files/doc_financials/2019/Q1/CW-1Q'19-EarningsPressRelease-Final-(1).pdf)

[p. 12]

| | Three Months Ended | | |
|------------------------------------|--------------------|-------------------|------------|
| | March 31, | | |
| | 2019 | 2018 | Change % |
| Sales: | | | |
| Commercial/Industrial | \$ 293,507 | \$ 296,641 | (1%) |
| Defense | 121,022 | 118,901 | 2% |
| Power | 163,785 | 131,980 | 24% |
| Total sales | \$ 578,314 | \$ 547,522 | 6% |
| Operating income (expense): | | | |
| Commercial/Industrial | \$ 39,446 | \$ 39,225 | 1% |
| Defense | 17,653 | 19,728 | (11%) |
| Power | 24,219 | 15,342 | 58% |
| Total segments | \$ 81,318 | \$ 74,295 | 9% |
| Corporate and other | (9,273) | (9,797) | 5% |
| Total operating income | \$ 72,045 | \$ 64,498 | 12% |
| Operating margins: | | | |
| Commercial/Industrial | 13.4 % | 13.2 % | |
| Defense | 14.6 % | 16.6 % | |
| Power | 14.8 % | 11.6 % | |
| Total Curtiss-Wright | 12.5% | 11.8% | |
| Segment margins | 14.1 % | 13.6 % | |

[p. 13]

| | Three Months Ended | | |
|-----------------------------|--------------------|-------------------|------------|
| | March 31, | | |
| | 2019 | 2018 | Change % |
| Defense markets: | | | |
| Aerospace | \$ 78,787 | \$ 79,153 | 0% |
| Ground | 20,758 | 22,519 | (8%) |
| Naval | 131,088 | 103,489 | 27% |
| Total Defense | \$ 230,633 | \$ 205,161 | 12% |
| Commercial markets: | | | |
| Aerospace | \$ 103,221 | \$ 99,404 | 4% |
| Power Generation | 96,480 | 98,319 | (2%) |
| General Industrial | 147,980 | 144,638 | 2% |
| Total Commercial | \$ 347,681 | \$ 342,361 | 2% |
| Total Curtiss-Wright | \$ 578,314 | \$ 547,522 | 6% |

10. State-Owned Enterprises (SOEs)

| |
|---|
| Question |
| 10.1 Does the SOE publish a breakdown of its shareholder voting rights? |
| Score |
| N/A |
| Comments |
| N/A |
| Evidence |
| |

| |
|--|
| Question |
| 10.2 Are the SOE's commercial and public policy objectives publicly available? |
| Score |
| N/A |
| Comments |
| N/A |
| Evidence |
| |

| |
|---|
| Question |
| 10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process? |
| Score |
| N/A |
| Comments |
| N/A |
| Evidence |
| |

| |
|--|
| Question |
| 10.4 Is the SOE's audit committee composed of a majority of independent directors? |
| Score |
| N/A |
| Comments |
| N/A |
| Evidence |
| |

| |
|---|
| Question |
| 10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value? |
| Score |
| N/A |
| Comments |
| N/A |
| Evidence |
| |

List of Evidence & Sources

| No. | Type <i>(Webpage or Document)</i> | Name | Download Date | Link |
|-----|--------------------------------------|--|---------------|---|
| 01 | Document | Code of Conduct | 05/07/2019 | https://www.curtisswright.com/investors/corporate-governance/code-of-conduct/default.aspx |
| 02 | Document | Corporate Governance Guidelines | 05/07/2019 | https://www.curtisswright.com/investors/corporate-governance/corporate-governance-guidelines/default.aspx |
| 03 | Document | 2019 Proxy Statement | 05/07/2019 | https://s1.q4cdn.com/395056968/files/doc_financials/2018/CW-Proxy-2019-Final.pdf |
| 04 | Document | Committee on Directors and Governance Charter | 06/07/2019 | https://s1.q4cdn.com/395056968/files/doc_governance/2018/DG-Charter-Revision-June-2017.pdf |
| 05 | Document | 2018 Annual Report | 06/07/2019 | https://s1.q4cdn.com/395056968/files/doc_financials/2018/CW-2018-Annual-Report-Final-w-10K.pdf |
| 06 | Document | Code of Conduct – Suppliers and Customers | 06/07/2019 | https://www.curtisswright.com/investors/corporate-governance/Code-of-Conduct--Suppliers-and-Customers/ |
| 07 | Document | Corporate Social Responsibility | 06/07/2019 | https://www.curtisswright.com/investors/corporate-governance/Corporate-Social-Responsibility/default.aspx |
| 08 | Document | Curtiss-Wright Corporation News Release 08/05/2019 | 08/07/2019 | https://s1.q4cdn.com/395056968/files/doc_financials/2019/Q1/CW-1Q'19-EarningsPressRelease-Final-(1).pdf |
| 09 | Webpage | New York Stock Quote - Curtiss-Wright Corp | 27/07/2019 | https://www.bloomberg.com/quote/CW:US |
| 10 | Webpage | OpenSecrets – Curtiss-Wright Corp PAC Summary Page | 23/10/2019 | https://www.opensecrets.org/pacs/lookup2.php?cycle=2020&strID=C00420596 |
| 11 | Webpage | EthicsPoint – Curtiss-Wright Corporation | 24/10/2019 | https://secure.ethicspoint.com/domain/media/en/gui/42903/index.html |
| 12 | Document | EthicsPoint FAQs | 24/10/2019 | https://secure.ethicspoint.com/domain/media/en/gui/42903/faq.pdf |