

Updated October 26, 2015

Jeppesen Has Adopted the Boeing Company Code of Basic Working Conditions and Human Rights

Code of Basic Working Conditions and Human Rights

This Code of Basic Working Conditions and Human Rights represents the commitment of the Company to fundamental standards that make Jeppesen a good place to work. Jeppesen people are our most vital asset. The individual and collective contributions of Jeppesen people at all levels are essential to the success of the company. In recognition of this, Jeppesen has developed policies and practices designed to assure that our employees enjoy the protections afforded by the concepts set forth in this Code.

Jeppesen is committed to the protection and advancement of human rights in its worldwide operations, and the concepts in this Code are generally derived from Jeppesen policies and practices already in place, but which have not previously been summarized in a single document. While parts of this Code reflect our review of working standards and human rights concepts advanced by other groups, such as the International Labor Organization, the Universal Declaration of Human Rights, and the Global Sullivan Principles, this Code represents Jeppesen's statement of its own standards on these subjects, rather than those of a third party.

Jeppesen worldwide operations take place in an increasingly diverse universe, so circumstances can arise where legal, regulatory or other requirements may necessitate applying or interpreting this Code in ways that assure compliance with applicable local law. In any event, however, we believe that the concepts in this Code represent important

fundamental values that should underlie all aspects of the employment relationship.

Non-Discrimination and Harassment

It is the policy of Jeppesen to attract and retain the best qualified people available without regard to race, color, religion, national origin, gender, sexual orientation, gender identity, age, physical or mental disability, or veteran status. Our nondiscrimination policy applies to applicants as well as employees and covers all terms and conditions of employment, including recruiting, hiring, transfers, promotions, terminations, compensation and benefits. Discrimination or harassment based on any of the above factors is prohibited, as is retaliation against a person who has made a complaint or given information regarding possible violations of this policy.

Freedom of Association

We recognize and respect employee rights to join or not join any lawful organization of their own choosing. We are committed to complying with laws pertaining to freedom of association, privacy and the National Labor Relations Board (NLRB).

Environment, Health and Safety

We are committed to providing employees with a safe and healthful workplace, protecting the environment wherever we conduct business and striving for excellence in safety, health and environment stewardship.

Work Environment and Compensation

We are committed to promoting a work environment that fosters communication, productivity, creativity, teamwork, and employee engagement. As a global company, we seek to provide employees with compensation and benefits that are fair and equitable for the type of work and geographic location (local market) where the work is being performed, and competitive with other world-class companies.

Hours of Work and Work Scheduling

Each Jeppesen organization establishes work shifts and schedules as appropriate to meet business needs and to comply with applicable laws.

Expectations for our Suppliers

We are committed to the highest standards of ethical and business conduct as it relates to the procurement of goods and services. Our relationships with our third-party providers, including our consultants and contract labor, are defined by contracts, which are based on lawful, ethical, fair, and efficient practices. As a company we have outlined the expectations for basic working conditions and human rights in our supply chain.

Slavery, Human Trafficking, Forced Labor and Child Labor

Jeppesen believes that the employment relationship should be voluntary, and the terms of employment must comply with applicable laws and regulations. We are therefore opposed to slavery, human trafficking, forced labor and child labor and are committed to complying with

applicable laws prohibiting such exploitation.

We will inform our employees about this Code, and we will also encourage the partners and suppliers in our worldwide supply chain to adopt and enforce concepts similar to those in this Code. Employees who believe there may have been a violation of this Code should report it through established channels, and no retaliatory action will be tolerated against anyone who comes forward to raise genuine concerns about possible violations of this Code. Jeppesen may conduct assessments, as needed, to measure compliance related to the above commitments, using systems and processes it chooses. Jeppesen will periodically review this Code to determine whether revisions are appropriate. Any such revisions shall be promptly published on the Jeppesen website.