GROUP CONFLICT OF INTEREST POLICY

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1. INTRODUCTION

1.1 Melrose Industries PLC and its Business Lines (comprising the GKN Aerospace Engines and Airframes businesses) ("**Melrose**", "**Company**", "**Group**" or "**we**") has a policy of seeking to avoid Conflicts of Interest (as defined in paragraph 4) where possible. However, where Conflicts of Interest do occur, they should be managed by reporting them to relevant members of management, the Legal and/or Human Resources ("**HR**") functions in accordance with this Policy, and following the actions detailed herein to help manage or, where possible, resolve the Conflict of Interest.

2. POLICY STATEMENT

2.1 The purpose of this Policy is to:

2.1.1 assist in identifying Conflicts of Interest (as defined by this Policy);

2.1.2 explain the system for disclosure, management, or reporting of Conflicts of Interest;

2.1.3 provide guidance to those responsible for dealing with and resolving personal and organisational Conflicts of Interest; and

2.1.4 where possible, assist in the resolution of Conflicts of Interest in order to protect the reputation of the Group and its employees.

2.2 This Policy has been approved by the board of directors of Melrose Industries PLC ("**Melrose Board**").

2.3 The Group General Counsel is responsible for the contents of the Policy, and the Group General Counsel and Chief Human Resources Officer are jointly responsible for taking reasonable measures to ensure awareness of the Policy.

2.4 Throughout the Group we must establish a "culture" of compliance with this Policy. The executive team and HR team of each Business Line takes responsibility for ensuring effective transmission of this Policy throughout the business, together with the provision of relevant guidance and training, and appropriate safeguards, monitoring, and resources, in order to ensure compliance with this Policy.

2.5 Failure to comply with this Policy may result in appropriate action being taken against an employee (as defined in paragraph 3.1 below), which may include: (i) formal disciplinary measures, and (ii) adjustments to discretionary bonus elements and performance ratings, where permissible under applicable laws, regulations and labour practices.

3. SCOPE

3.1 This Policy applies to all individuals working at all levels throughout the Group, including members of the Board, Executive Committee, directors, managers, employees (whether permanent, fixed-term, or temporary), contractors, trainees, apprentices, casual workers /agency staff, volunteers, or any person working for the Group throughout the world (referred to collectively as "**employee(s)**") and relates to any Conflicts of Interest arising in connection with GKN Aerospace activities.

4. WHAT IS A CONFLICT OF INTEREST?

4.1 A conflict of interest is a personal interest (whether financial, familial or social) which affects, may affect or appear to affect, the ability of an employee or person working for the Group to:

4.1.1 make objective decisions on behalf of the Group;

4.1.2 act in the best interests of the Group; or

4.1.3 fulfil their contractual or employment (or similar) related obligations to the Group,

(“**Conflict of Interest**”).

4.2 For the purpose of this Policy, the term Conflict of Interest includes actual, perceived and potential Conflicts of Interest. These can be categorised as follows:

4.2.1 an **actual** Conflict of Interest is one that has arisen;

4.2.2 a **perceived** Conflict of Interest is one which a reasonable person would consider likely to compromise objectivity; or

4.2.3 a **potential** Conflict of Interest is a situation which could but has not yet developed into an actual or perceived Conflict of Interest.

Further guidance is available in Appendix A of this Policy.

4.3 There may be scenarios where a Conflict of Interest is considered an 'organisational’ rather than a ‘personal’ conflict of interest, this is known as an ‘OCI’. An OCI may arise or need to be considered in connection with material governmental contracts. Further guidance is available in Appendix B of this Policy.

5. EMPLOYEE OBLIGATIONS

5.1 At the time of onboarding all employees are required to complete a Conflict of Interest disclosure form (“**Disclosure Form**”) prior to commencing work for the Group. The Disclosure Form will be issued by the relevant local HR function and any Conflict of Interest disclosed using the Disclosure Form shall be registered in the local Conflicts of Interest Register in accordance with this Policy.

5.2 All employees shall, during their employment with the Group, seek to identify, avoid and mitigate any Conflict of Interest by following these guiding principles:

5.2.1 **Identify**: Consider if a situation that constitutes a Conflict of Interest might arise. Such as, a situation where your personal interests influence your decision-making on behalf of the Group.

5.2.2 **Avoid**: Wherever possible, avoid putting yourself in a conflict situation in the first place. For example, you may avoid working in the same team as a family member or you do not pursue a role outside of your existing commitments to the Group which may conflict with your position within the Group. Your local HR function and your line manager can help you to determine how best to avoid a Conflict of Interest.

5.2.3 **Mitigate**: In case of a Conflict of Interest, effectively mitigate such a Conflict of Interest by taking these steps:

STEP 1 Promptly notify an L1/L2/L3 Manager and a member of your local HR function if a Conflict of Interest exists or arises.

Note: notification should be made to **your** line manager and local HR function where the Conflict of Interest concerns you. Where the Conflict of Interest concerns **another employee**, you should notify their line manager and local HR site manager. If the respective line manager is not an L1/L2/L3 Manager or there is some other reason for notifying another person (e.g. line manager on holiday), another person may be notified provided they are an L1/L2/L3 Manager. Where you do so, you should ensure the original line manager and relevant member of the HR function are copied into any correspondence.

STEP 2 Work with the L1/L2/L3 Manager and local HR function, to whom you have notified of the Conflict of Interest, fulfil their requirements as provided for in paragraph 7 below.

Note: You must ensure that any Conflict of Interest is discussed openly, in a straightforward manner, giving as much information as you are able to, and, if possible, is resolved as soon as practically possible.

STEP 3 Provide all information required by the L1/L2/L3 Manager and relevant member of the HR function to enable them to prepare a statement in respect of the identified Conflict of Interest which can be registered in the Conflict of Interest register which shall be established (if not already in existence) and maintained by the local HR function ("**Conflict of Interest Register**").

STEP 4 In respect of any Conflict of Interest which relates to you, notify the relevant line manager and relevant member of the local HR function to whom you made aware of the Conflict of Interest in accordance with Step 1 should there be any subsequent changes to the circumstances affecting the original entry in the Conflict of Interest Register.

5.3 If there is a known or suspected breach of this Policy you must notify the Head of Legal and HR VP of your respective Business Line as soon as possible. If you have a legitimate factual basis to believe that your line manager, and the Head of Legal and/or the HR VP of your respective Business Line will be, or have been, unable to properly address a suspected breach of this Policy, you may use the Employee Disclosure Hotline to report a known or suspected breach.

6. BOARD, EXECUTIVE COMMITTEE AND SENIOR MANAGEMENT OBLIGATIONS

Melrose Board

6.1 Members of the Melrose Board must:

6.1.1 report any Conflict of Interest that they may have as follows:

(a) the CEO should report to the Group General Counsel;

(b) the CFO should report to the CEO and the Group General Counsel;

(c) the Chair of the Melrose Board should report to the Senior Independent Director and the Company Secretary; and

(d) any other member of the Melrose Board should report to the Chair of the Melrose Board and the Company Secretary,

6.1.2 upon request, provide a declaration, at least annually, to the Group General Counsel which confirms (as applicable) that they have no Conflicts of Interest to disclose or that they have a Conflict of Interest to disclose, together with full details of the same.

6.1.3 Any Melrose Board-level Conflicts of Interest shall be reviewed by the Nomination Committee in accordance with its Terms of Reference.

Executive Committee

6.2 Members of the Executive Committee (excluding the CEO, CFO and Group General Counsel) must:

6.2.1 report any Conflict of Interest that they may have to the CEO and Group General Counsel; and

6.2.2 upon request, provide a declaration, at least annually, to the Group General Counsel which confirms (as applicable) that they have either no Conflict of Interest to disclose, or a Conflict of Interest to declare, together with full details of the same.

6.3 The Group General Counsel must report any Conflict of Interest that they may have to the CEO or the Chair of the Melrose Board, and provide the declaration listed in paragraph 6.2.2 above to the CEO or the Chief Human Resources Officer.

Senior Management

6.4 L2/L3 Managers should report any Conflict of Interest to a member of the Executive Committee. All other employee obligations as described in this paragraph 5.2 will apply similarly.

7. REPORTING OBLIGATIONS

L1/L2/L3 Manager Reporting Obligations

7.1 As an L1, L2 or L3 Manager, you must:

7.1.1 work with your local HR function to assess any Conflict of Interest that is reported to you, or that you otherwise become aware of;

7.1.2 determine if a Conflict of Interest exists (with support from your local HR function, and the Head of Legal of your respective Business Line if you are in doubt over the existence of a Conflict of Interest);

7.1.3 once determined, submit a report to your local HR function in respect of the Conflict of Interest which has been identified;

7.1.4 discuss and determine the best course of action to resolve, manage or terminate the Conflict of Interest, in consultation with the relevant members of your local HR function and the Head of Legal of your respective Business Line and subsequently the employee(s) concerned;

7.1.5 request that the local HR function record the Conflict of Interest in their local Conflict of Interests Register along with a statement as to the relevant facts and decisions taken;

7.1.6 check regularly with the concerned employee(s) if the agreed remedial actions to resolve, manage or terminate the Conflict of Interest have been and continue to be implemented, keep the relevant members of the local HR function informed of any important updates regarding the identified Conflict of Interest;

7.1.7 make requests to the local HR function to amend the register entry when any changes occur or when the Conflict of Interest no longer exists; and

7.1.8 review on an annual basis, and discuss with your local HR function, any Conflicts of Interest that have been registered in the Conflict of Interest Register on your request, to ensure remedial actions are being managed as agreed.

Local HR function Reporting Obligations

7.2 As a member of the local HR function, it is your responsibility to:

7.2.1 review the report submitted to you in accordance with paragraph 7.1.3 above, and support the L1/L2/L3 Manager in discussing and determining the best course of action to resolve, manage or terminate the Conflict of Interest;

7.2.2 register the Conflict of Interest in and maintain your local Conflict of Interests Register in accordance with any requests received pursuant to paragraph 7.1.5 above and disclosures received in accordance with paragraph 5.1;

7.2.3 ensure that a copy of the entry into the Conflict of Interest Register, whether disclosed in accordance with paragraph 5.1 or 5.2, is recorded on the relevant employee's personnel file;

7.2.4 provide the L1/L2/L3 Manager with appropriate support to ensure they are able to review and monitor any Conflicts of Interest registered in your Conflicts of Interest Register and support them with the implementation of any remedial actions required in accordance with the terms of this Policy.

7.3 The relevant L1/L2/L3 manager and/or the local HR function should notify the Head of Legal of their respective Business Line of:

7.3.1 an actual Conflict of Interest where they feel the Group's position has been or may appear to have been compromised;

7.3.2 any significant Conflict of Interest; and

7.3.3 any Conflict of Interest where they consider that appropriate remedial steps cannot be agreed with the concerned employee(s),

further steps may be required as directed by the relevant Head of Legal.

8. HR VP, HEAD OF LEGAL AND BUSINESS LINE PRESIDENT

8.1 The HR VP, Head of Legal and President of each Business Line should review and discuss, on a half yearly basis, all Conflicts of Interest relevant to their Business Line. Should further information be required, or a case needs to be discussed further, the relevant HR VP will contact the L1/L2/L3 Manager who dealt with the report and the local HR function who registered the Conflict of Interest in their Conflicts of Interest Register.

8.2 The relevant Head of Legal should notify the Group General Counsel of:

8.2.1 an actual Conflict of Interest where they feel the Group's position has been or may appear to have been compromised;

8.2.2 any significant Conflict of Interest; and

8.2.3 any Conflict of Interest where they consider that the L2/L3 Manager has failed to agree appropriate remedial steps with the concerned employee(s),

further steps may be required as directed by the Group General Counsel.

9. STATUTORY DIRECTORS OF GROUP COMPANIES

9.1 If you are a statutory director of any company within the Group, the UK Companies Act (or its local law equivalents) may impose on you certain additional requirements for managing Conflicts of Interest. Please liaise with your Head of Legal in the first instance who can advise on these requirements.

10. HOW TO RECORD A CONFLICT OF INTEREST

10.1 Any Conflict of Interest identified in accordance with paragraph 5.1 of this Policy, namely via the Disclosure Form, shall be registered in the local Conflict of Interest Register by the local HR function who is responsible for the relevant employee's onboarding process.

10.2 Any Conflict of Interest identified in accordance with paragraph 5.2 of this Policy shall be registered by the local HR function who has supported the relevant L1/L2/L3 Manager to whom the Conflict of Interest was reported to.

10.3 When recording a Conflict of Interest, all information that could be considered as relevant should be provided.

10.4 Please contact your local HR function for further details regarding local Conflict of Interest Registers.

11. MISCELLANEOUS

11.1 Nothing in this Policy restricts your right to: (a) report to, communicate with, or participate in investigations by any US government agency without prior authorisation or notice to the Group, and to receive any related monetary award; and (b) engage in legally protected activity, including protected activity under US labor law.

11.2 This policy prohibits retaliation against anyone who, in good faith, raises a concern under this Policy, or reports to a US government agency, or participates in an investigation or proceeding; violations of this non-retaliation policy will result in discipline, up to and including termination.

APPENDIX A - CONFLICT OF INTEREST GUIDANCE

1. The following guidance illustrates the application of this Policy in various contexts. The examples provided below are not exclusive and are designed to provide guidance only. It is your responsibility to read, understand and apply the Policy correctly, and to seek further guidance if you need it. Where an action is prohibited under this Policy, it is highlighted as such.

2. The following scenarios may give rise to a Conflict of Interest:

2.1 Employment of family members and personal friends:

2.1.1 Access to employment and development opportunities within the Group must be based on an individual's ability, qualifications and suitability for the relevant opportunity and decisions in respect of the same must be free from any Conflict of Interest. Reporting relationships (i.e. who you report into), whether direct or indirect, with a family member, a personal friend or any other person you are in a personal relationship with may create a conflict of interest.

2.1.2 All recruitment and selection activities shall be in accordance with applicable law and your site's local recruitment practice policy as may be adopted and/or amended from time to time.

2.2 Doing business with family members and personal friends:

2.2.1 Employees **must not** conduct business on behalf of any part of the Group with any members of their families or personal friends, nor may they represent any part of the Group in business dealings with any company or organisation with which an employee, a member of their family, or a personal friend has a significant affiliation.

2.3 Referrals:

2.3.1 An employee whose work includes the provision of referrals to others (for example but not limited to purchasing and procurement of supplies) **must not** make referrals to any business in which they, an immediate family member or a co-worker has an interest in any manner, direct or indirect. This includes, by way of example, referrals to providers of medical services, property or insurance agents, financial counsellors or building contractors.

2.3.2 It is equally important to avoid the perception of pressure or influence to use a specific business or service. Employees whose duties include referral activity should provide a list of several qualified persons or businesses wherever possible.

2.4 Outside Employment:

2.4.1 Employees have a primary employment responsibility to their role within the Group. Typically, employees may be prohibited from additional employment outside of that in accordance with the terms of their contracts of employment and/or local workplace policies.

2.4.2 Employees **must** discuss with an L2/L3 Manager any work they undertake which is in addition to their employment with the Group that may impair their ability to use their best efforts in fulfilling their primary employment obligations to the Group.

2.4.3 Employees **must not** work for, or provide any services to, any third party which transacts with the Group. This includes our customers, suppliers, business partner or any other third party we deal with.

2.4.4 Employees **must not** work for, or provide any services to, a competitor or potential competitor of the Group save in the case of work-related unions. Please refer to local workplace and employee handbook policies (as applicable / appropriate) for specific details regarding outside employment with potential or actual competitors of the Group.

2.4.5 Employees **must not** work for or provide services for third parties in a manner that breaches Employee confidentiality agreements with the Group or breaches Employee responsibilities to protect trade secrets or proprietary business information of the Group.

2.4.6 Employees **must not** foster any relationship with any supplier, customer, competitor or other business partner of the Group that compromises their ability to conduct business objectively, and in the best interests of the Group. Please also refer to the Group's Anti-Bribery and Corruption Policy for further guidance.

2.5 Interests in other businesses:

2.5.1 Any personal interest in another business that could impair an employee's judgment or objectivity in carrying out their duties and responsibilities on behalf of the Group must be avoided. It is also important to avoid even the appearance of impropriety.

2.5.2 Employees (or members of their immediate families) **must not** have any interest or investments in any privately owned third party company which transacts with the Group. This includes our customers, suppliers, business partner or any other third party we deal with.

2.5.3 Where that third party is publicly listed, employees can hold a maximum of 5% (direct or indirect) investment of the issued share capital.

2.5.4 Employees **must not** have any interest or involvement in or with any competitor of the Group, irrespective of whether it is privately owned or publicly listed (except in respect of non-discretionary investments, e.g. tracker or managed funds).

2.5.5 Any non-discretionary investments falling into the categories above should be notified to the relevant Head of Legal to be considered on a case-by-case basis.

2.6 Outside Directorships, Non-Executive Director and/or Trustee roles:

2.6.1 If you are or intend to become the company director, officer, partner, or Trustee of another entity, trust, partnership, joint venture, charity, or similar, which is external to the Group, you are **required to declare** it to an L2/L3 Manager and further fulfil the employee obligations in accordance with paragraph 5.1.

2.6.2 An employee **may not** accept a position as a director, officer or Trustee of any third party with which the Group does business or with any competitor of the Group.

2.7 Charitable, Civic or Public Service:

2.7.1 In all civic or public service activity, our employees are expected to abide by the principles of honesty, openness and sincerity and to avoid embarrassment to themselves, and the Group. In order to avoid Conflict of Interest situations, before agreeing to take on civic or public service activity employees **must ensure** that their affiliation with the Group is known to the civic or public organisation. Our employees must disqualify themselves from any decision-making process by the organisation, which involves issues related to the purchase of GKN Aerospace products or community related impact.

2.8 Company time and assets:

2.8.1 Each employee is expected to devote their full time and attention to Company matters during their regular hours of work and for whatever reasonable additional time may be required to satisfy their job duties. The use of Company time and facilities to further outside business interests of any employee is **not permitted** and employees may face disciplinary action should this occur.

2.8.2 On some occasions it may be appropriate to use Company assets for non-Company business, for example to support a charitable or educational activity. Any such proposed use **must** be approved in accordance with the Delegation of Authority.

APPENDIX B

ORGANIZATIONAL CONFLICTS OF INTEREST (OCI) for U.S. Government Work

1. LEGAL FOUNDATION AND SCOPE

1.1 Regulatory Authority

This Appendix implements the requirements of Federal Acquisition Regulation (FAR) Subpart 9.5 – Organizational and Consultant Conflicts of Interest (OCI). It provides a framework for identifying, assessing, mitigating, and disclosing OCIs in connection with GKN Aerospace's performance of contracts and subcontracts under U.S. Government programs.

Note: *The FAR Council has proposed relocating OCI rules from Subpart 9.5 to Subpart 3.12 under the Preventing Organizational Conflicts of Interest in Federal Acquisition Act. Until finalized, FAR Subpart 9.5 remains in effect.*

1.2 Definition

Per FAR 2.101, an "Organizational Conflict of Interest (OCI)" arises when, due to relationships or other activities, a company or its affiliates:

- May be unable or potentially unable to render impartial assistance or advice to the Government;
- May have impaired objectivity in performing contract work; or
- May gain an unfair competitive advantage.

1.3 Applicability

This Appendix applies to all GKN Aerospace employees, departments, and affiliates involved in performing or supporting U.S. Government work—whether directly as a prime contractor or indirectly as a subcontractor. OCIs are particularly relevant in work involving:

- Systems engineering and technical direction
- Technical evaluation or acquisition support
- Development of specifications or statements of work
- Advisory or consulting services

2. TYPES OF ORGANIZATIONAL CONFLICTS OF INTEREST

2.1 Unequal Access to Information (FAR 9.505-4)

Occurs when GKN Aerospace gains access to non-public, competitively useful information in the performance of one contract or subcontract and may later compete (directly or through a prime) for related work.

Indicators:

- Proprietary or source selection information unavailable to other offerors
- Relationships that may offer insight into competitor pricing, designs, or evaluation plans

Mitigation Measures:

- Internal firewalls and access restrictions
- Personnel segregation
- NDAs and no-use agreements

- Time-based exclusions from future competitions
- Coordination with the prime contractor, if applicable

2.2 Biased Ground Rules (FAR 9.505-1, 9.505-2)

Arises when a company helps establish procurement requirements, source selection evaluation criteria, or technical specifications that could influence or favor its participation in a subsequent competition.

2.2.1 Systems Engineering and Technical Direction

GKN Aerospace may be restricted from future participation if it provides technical direction or early-phase design work that could bias subsequent procurements.

2.2.2 Preparing Specifications or Work Statements

If GKN Aerospace assists in preparing specifications or work statements for a competitive acquisition, it may be restricted from supplying those items.

Mitigation Measures:

- Exclusion from future related work
- Organizational separation of specification authors and delivery teams
- Independent review of work products
- Coordination with the prime to ensure alignment with mitigation plans

2.3 Impaired Objectivity (FAR 9.505-3)

Arises when GKN Aerospace is in a position to evaluate its own performance, the work of an affiliate, or the work of a competitor in support of a U.S. Government program.

Mitigation Measures:

- Use of third-party evaluators
- Firewalls or separate business units
- Segregation of personnel
- Disclosure and coordination with the prime contractor or contracting officer

3. COMPANY RESPONSIBILITIES

3.1 Pre-Proposal Assessment

Before submitting a proposal, whether directly to a U.S. Government agency or via a prime contractor, GKN Aerospace shall assess the potential for OCI by reviewing:

- Existing and recent (past three years) contract work
- Any access to non-public or proprietary information
- Involvement in defining procurement requirements
- Relationships with other contractors or subcontractors on the effort

Assessment Questions:

- Do we have non-public information that could provide a competitive advantage?
- Have we been involved in defining requirements or evaluation criteria?
- Would we be evaluating ourselves or an affiliate?

- Are there prior roles or relationships that could impair objectivity?

3.2 Mitigation Planning

If a potential OCI is identified, GKN Aerospace will develop a mitigation plan. Where acting as a subcontractor, coordination with the prime contractor is required. When acting as a prime, any proposed mitigation measures must be disclosed to the contracting officer, if required. Mitigation planning can include:

Avoidance Strategies:

- Decline to pursue the opportunity
- Modify scope of proposed work to remove conflict
- Separate advisory from delivery roles

Mitigation Techniques:

- Internal firewalls
- Personnel reassignment or separation
- Use of different organizational units or affiliates
- NDAs and information handling restrictions
- Time-based recusal from related work
- Prime contractor mitigation compliance, if applicable

Neutralization (if permitted):

- Release of protected information to all offerors, consistent with any NDA restrictions
- U.S. Government-authorized publication of source data

3.3 Documentation

All OCI reviews and mitigation efforts must be documented and retained for a minimum of seven years. Documentation must include:

- Description of the opportunity
- Contracts and relationships reviewed
- Risk findings
- Mitigation plan details
- Legal and management approvals
- Prime contractor coordination (if applicable)
- Periodic review plans (if applicable)

4. PROCUREMENT INTEGRITY ACT (PIA) COMPLIANCE

4.1 Overview

The Procurement Integrity Act (41 U.S.C. §§ 2101–2107, implemented in FAR 3.104) prohibits the improper disclosure or receipt of procurement-sensitive information and imposes restrictions on the post-employment activities of former U.S. Government personnel. These prohibitions apply equally to prime contractors and subcontractors.

4.2 Key Prohibitions

Employees must not:

- Solicit, obtain, or use source selection or contractor bid/proposal information without proper authorization
- Disclose such information internally or externally except as authorized
- Use such information for personal, commercial, or competitive gain

Examples of Protected Information:

- Competitor pricing or proprietary data
- Technical evaluations
- Source selection plans or scoring criteria
- Internal U.S. Government deliberations

4.3 Post-Government Employment Restrictions

Hiring of former U.S. Government personnel must comply with PIA restrictions (e.g., 1-year compensation bans or permanent bans on participation in certain matters). Legal review is required before extending offers to individuals previously involved in large U.S. Government procurements.

4.4 Subcontractor Considerations

When acting as a subcontractor:

- GKN Aerospace will report any potential PIA issues to the prime contractor, unless otherwise required to report directly to the U.S. Government
- Information protections and access controls must be consistent with prime contractor requirements and applicable flowdowns
- Any required certifications or disclosures will be provided to the prime contractor, as applicable

4.5 Controls and Prevention

- Annual PIA training for proposal and contract teams
- Internal access restrictions to procurement-sensitive information
- Employment screening for former U.S. Government personnel
- Reporting procedures for suspected violations

5. PRIME CONTRACTOR COORDINATION (WHEN SUBCONTRACTING)

When performing as a subcontractor:

- GKN Aerospace will comply with all flowdown obligations and reporting requirements related to OCI and PIA
- All disclosures, certifications, and mitigation plans will be coordinated with the prime contractor

- Prime contractor directives or mitigation frameworks will be adopted and enforced internally, as applicable
- Disclosures to the U.S. Government will be made through the prime unless otherwise directed by regulation or subcontract terms

When acting as a prime:

- GKN Aerospace will assess and manage OCIs in accordance with FAR 9.5
- All required disclosures and certifications will be submitted directly to the contracting officer
- Waiver requests, if applicable, will be coordinated through Legal and submitted per FAR 9.503

6. TRAINING AND MONITORING

6.1 Training

All personnel involved in U.S. Government contracting must complete annual training on:

- OCI types, risks, and mitigation procedures
- PIA restrictions and information handling rules
- Reporting protocols and disclosure requirements
- Prime contractor coordination responsibilities

6.2 Monitoring

- Periodic review of active contracts and subcontracts for emerging OCI risks
- Annual update of this Appendix and training content
- Internal audits to validate implementation of mitigation plans and documentation
- Legal review of flowdown clauses in new subcontracts