TransDigm Group Incorporated

Whistleblower Policy and Procedures

Effective Date of July 24, 2024

Purpose: This Policy of TransDigm Group Incorporated (the "Company") addresses the Company's continuing commitment to ethical behavior by helping to foster an environment where employees can act without fear of retaliation. To that end, the Company has established procedures for reporting of wrongdoing or suspected wrongdoing. The procedures set forth herein include procedures for (i) the receipt, retention, and treatment of complaints received by the Company regarding wrongdoing generally; and (ii) the confidential, anonymous submission by employees of the Company or its subsidiaries of concerns regarding questionable accounting or auditing related matters.

The purpose of this Policy is to encourage all employees to disclose any wrongdoing that may adversely impact the Company, the Company's customers, shareholders, employees, investors, or the public at large. This Policy also sets forth a process to investigate reported acts of wrongdoing and retaliation. We encourage employees to discuss with their supervisors, managers or other appropriate personnel the best course of action in a particular situation.

Reports of Wrongdoing: The Company shall not take adverse employment action against an employee in retaliation for:

- any reports of wrongdoing made in good faith; or
- providing information or causing information to be provided in an investigation conducted by any state or federal regulatory agency or authority, a member of the U.S. Congress, any committee of Congress, or person at the Company with supervisory or similar authority over the employee, regarding any conduct the employee in good faith believes constitutes a violation of federal law regarding securities fraud, any rule or regulation of the Securities and Exchange Commission or any provision of federal law relating to fraud against the Company's shareholders; or
- participating in an investigation, hearing, court proceeding or other administrative inquiry in connection with a report of wrongdoing.

This Policy is intended to encourage reporting of wrongdoing by the Company's employees and presumes that employees will act in good faith and will not make false accusations. An employee who knowingly or recklessly makes statements or disclosures that are not in good faith may be subject to discipline, which may include termination. Employees who report acts of wrongdoing pursuant to this Policy can and will continue to be held to the Company's general job performance standards. Therefore, this Policy may not be used by an employee against whom legitimate adverse employment actions have been taken or are proposed to be taken for reasons other than prohibited retaliatory actions, such as poor job performance or misconduct by the employee as a defense against the Company's lawful actions.

Definitions: For purposes of this Policy:

(1) Good Faith. Good faith is evident when the report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe the report is true; but a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious, false or frivolous.

(2) Wrongdoing. Examples of wrongdoing include, but are not limited to, fraud, including financial fraud and accounting fraud, violation of laws and regulations, violations of Company policies, unethical behavior or practices, endangerment to public health or safety and negligence of duty.

(3) Adverse Employment Action. Examples of adverse employment action include, but are not limited to, demotion, suspension, termination, transfer to a lesser position, denial of promotions, denial of benefits, threats, harassment, denial of compensation and privileges as a result of the employee's report of wrongdoing, or any manner of discrimination against an employee in the terms and conditions of employment because of any other lawful act done by the employee pursuant to this Policy or Section 806 of the Sarbanes-Oxley Act of 2002.

Reports of Wrongdoing: We encourage employees who become aware of any wrongdoing or suspected wrongdoing to make a report as soon as possible by contacting the General Counsel or her/his designee (if a designee is selected, we will give notice of the selection to all employees). Employees may make such reports in writing, by telephone or in person. The current contact information for the General Counsel is:

General Counsel
TransDigm Group Incorporated
1350 Euclid Avenue, Suite 1600
Cleveland, Ohio 44115

(216) 706-2960

If an act of wrongdoing concerns the General Counsel or her/his immediate subordinates, the report of wrongdoing should be filed with the Audit Committee of the Board of Directors. Contact information for the Audit Committee Chairman is:

Chairman, Audit Committee
TransDigm Group Incorporated
1350 Euclid Avenue, Suite 1600
Cleveland, Ohio 44115

(216) 706-2960

Except as otherwise provided below with respect to confidential and anonymous submissions by employees of concerns regarding questionable accounting, auditing or internal accounting control matters, to the extent practical, we will not reveal the identity of any employee who makes reports pursuant to this Policy to persons in the employee's department, division or work location. The Company will make good faith efforts to protect the confidentiality of employees making reports; but the Company or its employees and agents may reveal the reporting employee's identity and confidential information to the extent necessary to permit a thorough and effective investigation.

Confidential and Anonymous Reports Relating to Questionable Auditing and Accounting Related Matters: In addition to the other procedures set forth herein, the Company has established and the Audit Committee has approved procedures by which employees and other persons may make confidential and anonymous submission of concerns regarding questionable auditing and accounting related matters involving the Company. Anyone wishing to make such a confidential and anonymous submission should contact Convercent via the Internet at www.convercent.com or by calling the following toll free 24-hour number 1-800-461-9330. The submission should be factual rather than speculative and should contain as much specific information as possible to allow for a proper assessment.

Treatment of Reports and Administration of Policy: The Audit Committee of the Company's Board of Directors is primarily responsible for the administration of this Policy. The Audit Committee will work closely with the General Counsel and the Company's internal auditors to ensure this Policy's effectiveness and may delegate to management and/or third parties, including professional advisors, responsibility for all or part of the administration of this Policy. The Audit Committee will receive quarterly summaries of all reports made pursuant to this Policy.

For each reported instance of wrongdoing, report or complaint of questionable accounting, auditing or internal control matters made hereunder (collectively, “Reports of Wrongdoing”) an inquiry or investigation will be initiated to determine if the report can be substantiated or has merit. That inquiry or investigation will be made by a person or persons (the “Investigating Person”) designated by the Audit Committee. Investigating Persons may include members of the Audit Committee, the General Counsel, the Company’s independent auditor or the Company’s Chief Financial Officer.

The Investigating Person will make a determination, in his or her reasonable judgment, whether a reasonable basis exists for commencing an investigation into the Report of Wrongdoing. The Investigating Person may conduct an initial informal inquiry. The purpose of the initial review of the Investigating Person is to screen the Reports of Wrongdoing so that the Audit Committee does not have to examine immaterial or spurious complaints. Nevertheless, the Audit Committee will have oversight authority over the screening process and may review, in its discretion, complaints received that were screened out for immediate reporting to the Audit Committee. If the Investigating Person does not screen out a Report of Wrongdoing he or she will promptly forward the Report of Wrongdoing to the Chairman of the Audit Committee along with his or her conclusions (even if preliminary or qualified) about the merits of the Report of Wrongdoing.

Following the receipt of any Report of Wrongdoing, the Audit Committee will investigate each matter reported and recommend that the Company or Board take appropriate corrective or disciplinary action. The Audit Committee may use employees of the Company and/or outside legal, accounting or other advisors, as appropriate, to conduct any investigation of a Report of Wrongdoing.

We will maintain a confidential file for each report or complaint for an appropriate time period. We may contact human resources or other appropriate management personnel to determine what employment action, if any, should be taken. Results of all investigations will be reviewed by the General Counsel and reported to the Audit Committee of the Board of Directors.

Claims of Retaliation: Claims of acts of retaliation should be submitted to the Chairman of the Audit Committee, who will immediately notify the applicable director of human resources or the Company’s outside counsel to initiate a confidential investigation.