

TransDigm Policy on Political Contributions and Engagement

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At TransDigm, our focus is on delivering long-term value through our role as a leading global designer, producer and supplier of highly engineered aircraft components, systems, and subsystems. We follow a consistent long-term strategy built around delivering reliable, highly engineered parts efficiently and on time. To do so, we employ thousands of people across nearly 70 manufacturing facilities in the United States.

TransDigm and our family of autonomous operating units are affected by federal government agencies in a variety of ways. Ultimately, the decisions of policymakers affect our company, our industry, our employees, and the communities we serve, as well as our shareholders.

As a result, from time to time we engage with policymakers and the political process in a thoughtful, transparent, and sustained way to inform about our business and public policy issues. In keeping with this principle, TransDigm seeks to engage with elected officials and other policymakers at the federal level.

As a company, we are committed to complying with applicable federal, state, and local laws governing political activities. Reflecting this commitment, we have adopted this Policy to govern the political activities of our company and our affiliated employee political action committee, and to ensure TransDigm's engagement with the political process is ethical, principled, transparent, and fully compliant with relevant legal requirements.

Corporate Contributions and Political Activities

TransDigm does not contribute corporate funds or make in-kind contributions to candidates for federal office or to the federal accounts of political parties. TransDigm does not reimburse or give any type of credit to any individual or organization for contributions or in-kind contributions to candidates for federal office or to the federal accounts of political parties. As a matter of corporate policy, TransDigm does not make any corporate Political Contributions in the United States or any other country—whether at the federal, state, or local levels. This includes refraining from making Political Contributions to state or local candidates, even where allowed by law. TransDigm does not make Political Contributions to independent expenditure-only political committees (also known as Super PACs). For purposes of this Policy, the term “Political Contribution” means any gift, loan, advance, expenditure or deposit of money or anything of value, made: (i) for the purpose of influencing any election for federal, state, or local office; or (ii) to pay debt incurred in connection with any such election. This includes any contribution to a registered candidate committee, political committee, or political party committee, as well as any expenditure made in support of or opposition to a candidate or political party.

Although allowed under applicable laws, TransDigm has also determined as a matter of policy not to spend corporate funds on independent expenditures or electioneering communications as defined under applicable laws.

TransDigm Group, Inc. Employee Political Action Committee

To enable eligible employees to pool resources to engage with the political process, TransDigm has established a non-partisan separate segregated fund or “PAC,” known as the TransDigm Group, Inc. Employee Political Action Committee (“Employee PAC”). Only eligible employees can contribute to the

Employee PAC, and all participation is strictly voluntary. Corporate funds are not contributed to the Employee PAC.

The Employee PAC is overseen by a PAC-specific Board of Directors (“Employee PAC Board”). The Employee PAC Board is regularly briefed and consulted on all Political Contributions made by the Employee PAC. The Employee PAC has also implemented appropriate internal and external controls to ensure that it is properly managed and complies with federally mandated contribution limits and restrictions.

As required by law, all Political Contributions accepted or made by the Employee PAC are reported regularly to the Federal Election Commission (“FEC”) and are publicly available. To find detailed information about Employee PAC contributions, visit the FEC’s website at <http://www.fec.gov>, or the FEC’s dedicated disclosure page for the Employee PAC at <https://www.fec.gov/data/committee/C00714329/>. TransDigm does not maintain state level PACs that make Political Contributions to state or local candidates.

Trade Associations

TransDigm may also be a member of other chambers of commerce, business leagues, and other associations at the federal, state, and local levels. These organizations may engage in policy outreach and public advocacy, and as a result TransDigm’s participation may be subject to disclosure or reporting under applicable lobbying regimes. TransDigm is committed to complying with all applicable lobbying laws and to reporting trade association activities, donations, and memberships as required by such laws.

Lobbying

TransDigm may participate in direct advocacy and lobbying on those publicly policy issues that we believe are relevant to our company, industry, and shareholders. TransDigm engages with federal policymakers through external lobbying firms, and as such we are listed as a client on such firms’ Lobbying Disclosure Act (“LDA”) registrations. These reports are publicly available at <https://lda.senate.gov/system/public/>. TransDigm is committed to complying with the LDA and similar state and local lobbying regimes and will register to the extent required under any applicable lobbying law.