



**Spirit AeroSystems Holdings, Inc. and Spirit AeroSystems, Inc. (collectively, “Spirit”)**

**Finance Code of Professional Conduct**

**Revised October 21, 2020**

Spirit’s Chief Executive Officer (CEO), Chief Financial Officer (CFO), Corporate Controller, and employees of the finance organization hold an important and elevated role in corporate governance in that they are uniquely capable and empowered to ensure that all stakeholders' interests are appropriately balanced, protected, and preserved. This Finance Code of Professional Conduct provides principles which are expected to be adhered to and advocated. These principles of ethical business conduct encompass rules regarding individual and peer responsibilities, as well as responsibilities to Spirit employees, the public, and other stakeholders. The CEO, CFO (or other principal financial officer), Corporate Controller (or other principal accounting officer), and all Finance employees are expected to abide by this Code. This Code is complementary, and does not replace, responsibilities all employees have as outlined in existing Spirit Code of Conduct and Ethics and Business Conduct requirements and procedures. Any violations of this Code may result in disciplinary action, up to and including termination of employment.

All employees covered by the Finance Code of Professional Conduct will:

- Act with honesty and integrity, including the ethical handling of actual or apparent conflicts of interest in personal and professional relationships.
- Provide stakeholders with information that is accurate, full, objective, fair, relevant, timely and understandable, including information in our filings with the U.S. Securities and Exchange Commission and in our other public communications.
- Comply with applicable rules and regulations of federal, state, provincial and local governments, and other appropriate private and public regulatory agencies with jurisdiction over us, including the New York Stock Exchange.
- Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing one’s independent judgment to be subordinated to other interests.
- Respect the confidentiality of information acquired in the course of one’s work except when authorized or otherwise legally obligated to disclose, and not use confidential information acquired in the course of one’s work for personal advantage.
- Proactively promote and be an example of ethical behavior as a responsible partner among peers, in the work environment and the community.
- Exercise responsible use, control, and stewardship over all Spirit assets and resources that are employed by or entrusted to us.
- Not coerce, manipulate, mislead, or unduly influence any authorized audit or interfere with any auditor engaged in the performance of an internal or independent audit of Spirit's system of internal controls, financial statements, or accounting books and records.
- Promptly report known or suspected violations of this Code in accordance with the Code of Business Conduct.
- Accept accountability for adherence to this Financial Code.

Please be aware that persons who knowingly make a report that is false or that willfully disregard its truth or accuracy, or engage in any other bad faith use of the reporting system, may be deemed to be in violation of other company policies.

Consents obtained pursuant to the Finance Code of Professional Conduct, or waivers of any provision hereof, may be made only by the Board of Directors or a committee thereof. Any amendment to the Finance Code of Professional Conduct may be made only by the Board of Directors or an appropriate committee thereof. If a waiver of the Finance Code of Professional Conduct is granted for any Senior Officer or if the Finance Code of Professional Conduct is amended, appropriate disclosure will be made promptly in accordance with the rules and regulations of the SEC and the requirements of the New York Stock Exchange.

**Your Personal Commitment to the  
Spirit Finance Code of Professional Conduct**

I acknowledge that I have received and read the Spirit Finance Code of Professional Conduct and understand my obligations as an employee to comply with the Code.

Please sign here: \_\_\_\_\_ Bems: \_\_\_\_\_ Date: \_\_\_\_\_

Please print your name: \_\_\_\_\_