

## **CPI AEROSTRUCTURES, INC.**

### **Whistleblower Policy**

CPI Aerostructures, Inc. (“CPI Aero” or “Company”) is committed to high standards of ethical, moral and business conduct, to fostering a workplace that is conducive to open communication regarding the Company’s business practices and ethical standards, and to complying with applicable law. In line with this commitment, this policy aims to provide an avenue to raise concerns and provide reassurance that any employee will be protected from unlawful retaliation or victimization for “whistleblowing” or otherwise bringing issues to CPI Aero’s attention. It is the intent of CPI Aero to adhere to all laws and regulations that apply to the Company. The support of all employees, all independent contractors and suppliers who provide services to CPI Aero is necessary to achieve compliance with applicable laws and regulations.

If a current or former CPI Aero employee, independent contractor or supplier reasonably believes that a policy, practice or activity of the Company or of a Company representative is in violation of law, employees or independent contractors must bring the matter to the attention of CPI’s Ethics Officer, April Galena, via written complaint at [EthicsConcern@cpiaero.com](mailto:EthicsConcern@cpiaero.com) so that the Company may investigate and correct such practice. CPI Aero will investigate all good faith complaints.

A current or former employee, independent contractor or supplier who makes a disclosure to a public body must first make a good faith effort to notify CPI Aero of the activity, policy or practice.

There is no obligation to notify CPI Aero in the following limited instances where: (a) there is an imminent and serious danger to the public health or safety; (b) the employee, contractor or supplier reasonably believes that reporting would result in a destruction of evidence or other concealment of the activity, policy or practice; (c) such activity, policy or practice could reasonably be expected to lead to endangering the welfare of a minor; (d) the employee, contractor or supplier reasonably believes that reporting would result in physical harm to the employee or any other person; or (e) the employee, contractor or supplier reasonably believes that the Ethics Officer, April Galena, is already aware of the activity, policy or practice and will not correct such activity, policy or practice.

CPI Aero will not retaliate against any employee, former employee, independent contractor or supplier who takes action, in good faith, as set forth above.

The protection described herein is only available to employees and former employees who comply with this policy. Nothing in this policy protects individuals from the consequences of their own unethical or unlawful conduct, including submitting false or baseless allegations. Individuals who deliberately make false or baseless allegations are subject to disciplinary action, up to and including termination.