

Signature Aviation Code of Ethical Conduct for Suppliers, Contractors, and Consultants

SUPPLIER OBLIGATIONS

Each Supplier Agrees:

Ethics; Improper Payments & Fair Dealing. To uphold the highest standards of integrity in all business interactions; to transparently conduct and accurately reflect in its books and records its business dealings; to avoid engaging in any corruption, extortion, embezzlement or bribery (including promising, offering, giving or accepting); and to comply with all laws and regulations applicable to the conduct of its business, including all applicable anti-bribery and anti-corruption laws.

Working with Governments. To maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery; and to provide supporting data to Signature Aviation when requested.

Environment, Health & Safety. To comply with applicable environmental laws and regulations; to provide workers a safe and healthy workplace; to not adversely affect the environment; and to strive to reduce energy, waste and natural resource consumption by implementing conservation and substitution measures.

Trade Controls & Customs Matters. To comply with applicable export and import laws and regulations; and plan for and obtain all necessary authorizations and licenses to ensure timely and compliant delivery of their product.

Fair Employment Practices. To comply with applicable laws and regulations governing wages and hours; to allow workers to choose freely whether to organize or join associations for the purpose of collective bargaining as provided by local law; and to prohibit discrimination, harassment and retaliation.

Human Rights. To respect the human rights of your employees and those in your supply chain; to never use, engage in or support practices that condone the use of forced, prison or indentured labor, or workers subject to any form of compulsion, coercion, deception or other abuse of power, which includes human trafficking, slavery and child labor; comply with all applicable laws and regulations

OVERVIEW

Signature Aviation is committed to conducting business fairly, impartially and in an ethical and proper manner. We support the protection of human rights around the world and are guided by fundamental principles such as the U.N.'s Universal Declaration of Human Rights and applicable law, including the Modern Slavery Act 2015.

Our employees, officers and directors must conduct themselves in accordance with the Signature Aviation **Code of Business Ethics** and seek to avoid even the appearance of improper behavior. Copies of our Code of Business Ethics and other policies on ethical conduct can be found at <https://www.signatureaviation.com/corporate-responsibility/ethics> (collectively, "**Ethical Conduct Policies**").

We expect each of our suppliers, contractors and consultants (collectively, "**Suppliers**") to conduct business fairly, impartially and in an ethical and proper manner. In addition, we expect each of our Suppliers to adhere to the principles of our Ethical Conduct Policies concerning compliance with all applicable laws, conducting business fairly and ethically, respecting human rights, conserving the environment, and providing high quality, safe products and services.

Suppliers are expected to cascade these principles to their own suppliers. This may involve the establishment of supply chain management processes that integrate the requirements of this Code of Ethical Conduct.

relating to the prevention of slavery, human trafficking, child labor, forced labor and the ethical treatment of people; and to adopt policies and establish systems to procure tantalum, tin, tungsten, and gold from sources that have been verified as conflict free, and to provide supporting data on your supply chain when requested.

Security & Privacy. To respect the privacy rights of individuals; to safeguard Signature Aviation proprietary information; and to ensure compliance with laws and directives providing for the protection, transfer, access and storage of personal information.

Intellectual Property. To respect the intellectual and other property rights of Signature Aviation and third parties, including all patents, trademarks and copyrights.

Competition Law. To comply with competition (antitrust) laws in the countries where they operate or sell product or services; and to not co-ordinate market conduct with others in a way that improperly restricts competition.

Controllership. To ensure that all invoices and any customs or similar documentation submitted to Signature Aviation or governmental authorities or audited by third parties in connection with transactions involving Signature Aviation accurately describe the goods and services provided or delivered and the price thereof and ensure that all documents, communications and accounting are accurate and honest.

Conflict of Interest. To notify Signature Aviation of any actual or potential conflicts of interest as soon as they are known.

RESPONSIBILITY

All Suppliers are expected to self-monitor their compliance with this Code of Ethics and commit to maintaining a management system designed to ensure compliance with the principles set forth herein, all applicable laws and regulations, to identify and mitigate any related operational risks, and to facilitate continuous improvement of the Supplier’s business operations.

Signature Aviation will assess its Suppliers’ compliance with the foregoing commitment to our Ethical Conduct Policies and violations of this Code of Ethical Conduct may jeopardize a Supplier’s relationship up to and including termination of the business relationship.

If any Supplier has cause to believe that any agent or employee of Signature Aviation has behaved improperly, unethically or otherwise violated the Ethical Conduct Policies or such Supplier has violated our Ethical Conduct Policies or this Code of Ethical Conduct, we expect the Supplier to report such behavior to the Signature

Aviation Ethics Hotline or to a senior executive of Signature Aviation and/or a Signature Aviation’s Legal Department. Signature Aviation’s Ethics Hotline can be reached at <https://signatureaviation.alertline.com>

Supplier Policy	Title: Signature Code of Ethics for Third Parties	
	Function: Legal	
	Reviewed: December 2020	
	Owner: General Counsel	Page 2 of 2