

SUPPLIER CODE OF CONDUCT

(For Suppliers, Vendors, Contractors and Service Providers engaged with a GSSA / Airline Services Company)

1. Purpose

This Supplier Code of Conduct ("**Code**") sets out the minimum standards of ethical, legal, operational and professional conduct expected from all suppliers, vendors, contractors, consultants, subcontractors and service providers ("Supplier") engaged by the Company in connection with airline representation, cargo handling, ground support, logistics, aviation services and related business operations.

The Supplier shall comply with all applicable laws, regulations, industry standards and contractual obligations while conducting business with the Company.

2. Compliance with Laws

Supplier shall comply with all applicable laws, regulations, industry standards, and governmental requirements relevant to its operations, including labour and employment laws, aviation, cargo, customs and airport regulations, workplace health and safety requirements, environmental laws, anti-bribery, anti-corruption and anti-money laundering laws, data privacy and cybersecurity obligations, and applicable trade control, export control, economic sanctions, and international trade regulations.

Supplier shall obtain, maintain and renew all licenses, permits, registrations, approvals, certifications and authorizations necessary for the lawful conduct of its business operations and for the performance of services provided to the Company. Supplier shall promptly notify the Company of any suspension, revocation, investigation or non-compliance relating to such approvals or regulatory requirements.

3. Human Rights and Labour Standards

Supplier shall uphold internationally recognized human rights principles and fair labour practices in all its business operations and employment relationships.

a. Forced Labour: Supplier shall strictly prohibit and shall not engage in any form of forced, bonded, indentured, trafficked, prison or involuntary labour. Employees shall not be subjected to coercion, threats, unlawful withholding of wages, retention of identity documents or any practice restricting freedom of movement or lawful employment.

b. Child Labour: Supplier shall not employ any person below the minimum legal working age prescribed under applicable laws and regulations. Supplier shall maintain appropriate age verification procedures and comply with all applicable laws relating to young workers.

c. Fair Employment Practices: The Supplier shall maintain fair, lawful, and ethical employment practices and comply with applicable labour laws relating to wages, benefits, working hours, overtime, rest periods, and working conditions. The Supplier shall ensure a safe and respectful workplace free from harassment, abuse, discrimination, retaliation, or any inhumane treatment, and shall promote equality, dignity, mutual respect, and equal opportunity for all employees.

d. Non-Discrimination

Supplier shall not discriminate on the basis of race, religion, gender, nationality, disability, age or any other legally protected status.

4. Health, Safety and Security

Supplier shall provide and maintain a safe, secure, and healthy workplace for its employees and representatives in compliance with applicable health, safety, airport, cargo, and aviation security regulations. Supplier shall maintain appropriate safety measures, emergency procedures, sanitary facilities, safe working conditions, and ensure employees are fit for duty and free from alcohol or drug abuse during work.

5. Ethics and Business Integrity

Supplier shall conduct its business in a lawful, ethical, and transparent manner with high standards of integrity and professional conduct. Supplier shall not engage in bribery, corruption, kickbacks, fraud, misleading practices, conflicts of interest, or misuse of confidential information, and shall comply with applicable anti-corruption and business ethics laws while maintaining appropriate internal controls and compliance procedures.

6. Confidentiality and Data Protection

Supplier shall protect all confidential, commercial, operational, and customer information received from the Company or airline principals, use such information only for authorized business purposes, maintain appropriate security measures, and not disclose such information to any third party without prior written consent, except as required by law.

7. Environmental Responsibility

Supplier shall conduct its operations in an environmentally responsible manner and comply with applicable environmental laws and regulations, while taking reasonable efforts to minimize waste and pollution, promote efficient use of resources, properly manage hazardous substances and emissions, and support sustainable practices in aviation and logistics operations.

8. Prohabited Wildlife Trade

The Supplier shall comply with all applicable wildlife trafficking laws, statutes and regulations from time to time in force including but not limited to, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

9. Subcontractors and Third Parties

Supplier shall ensure that its subcontractors, agents and third-party service providers engaged in connection with services to the Company comply with the principles and standards set out in this Code. Supplier shall remain responsible for the acts and omissions of its subcontractors and representatives.

10. Documentation, Audit and Compliance Monitoring

Supplier shall maintain accurate records to demonstrate compliance with this Code and applicable laws. The Company reserves the right to request relevant documents, conduct



reasonable audits or inspections, and require corrective action in case of non-compliance. Failure to comply with this Code may result in suspension or termination of the business relationship, subject to applicable contractual terms.

11. Acceptance

By providing goods or services to the Company, the Supplier acknowledges and agrees to comply with this Supplier Code of Conduct and to uphold the standards contained herein throughout the business relationship.