



Ga
TELESIS®

Intelligently Defining Aviation®

SUPPLIER CODE OF CONDUCT

PREPARED BY: ENTERPRISE RISK MANAGEMENT

www.gatelesis.com

1. EXECUTIVE SUMMARY

At GA Telesis, we take pride in conducting our business in a professional and ethical manner. We take our responsibilities to our employees, customers, suppliers, investors and other stakeholders, and the communities in which we operate seriously and strive to meet the highest standards of behavior and decision-making. Exemplary business conduct depends on all of us accepting responsibility for upholding our high standards, and consequently, we expect all of our suppliers and their employees, officers, directors, agents and others acting on their behalf to understand and comply with this Code in the day-to-day conduct of their business.

This Code sets the standards of ethical conduct that we require from our suppliers when doing business with or on behalf of GA Telesis. Further, as our suppliers operate in different legal and cultural environments, the standards set forth in this Code operate as a benchmark for acceptable conduct and where applicable local laws impose greater obligations on a supplier, the supplier must comply with such laws and regulations.

2. HUMAN RIGHTS

We expect our suppliers to be committed to, and have respect for, the protection and preservation of human rights. Suppliers are expected to comply with applicable international and local legal requirements in their countries of operation. Suppliers must treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all and foster an inclusive and ethical culture.

2.1. HARASSMENT

Suppliers must respect people and promote a work environment that is free from harassing, coercive, or disruptive conduct, including sexual harassment, and conduct that creates an intimidating, hostile or otherwise offensive environment wherever they operate in the world, in addition to treating everyone fairly, showing consideration for their needs and listening to and understanding their viewpoints.

2.2. NON-DISCRIMINATION

We take pride in the fact that our workplace is inclusive and reflects the diversity of the communities in which we operate. Our suppliers must also provide equal opportunities to all employees and applicants and not discriminate based on race, religion, national origin, gender, sexual orientation, disability, or any other basis.

2.3. PROHIBITING CHILD LABOR

Suppliers must adhere to minimum age provisions of national labor laws and regulations, and, where national law is insufficient, consider international standards (e.g., ILO's Convention). Suppliers must work towards the elimination of child labor with the belief that societies that permit child labor are jeopardizing their future and that of future generations.

2.4. RELIGIOUS ACTIVITIES

The rights of individuals to take part in religious activities must be recognized and suppliers must maintain a neutral position with respect to religion.

2.5. FREEDOM OF OPINION

It must be recognized that every individual has a right to freedom of opinion and expression, and that this right guarantees that no one may be harassed on account of their opinions.

3. HEALTH, SAFETY & ENVIRONMENT - HSE

GA Telesis expects all of its suppliers to provide their employees with a safe and healthy workplace to prevent accidents and injury and to take a proactive approach to health and safety by implementing policies, systems and training designed to prevent accidents and protect workers' health.

3.1. HEALTH & SAFETY

Every effort must be made to ensure that risks of accidents, injury and exposure to health risks are minimized. Our working partners are expected to identify, assess and take measures to eliminate potential safety risks. Employees should be informed of potential safety risks and instructed on proper, safe behavior and the corresponding safety measures to be implemented. Should such measures not afford adequate hazard management, employees should be provided with suitable personal protective equipment.

3.2. ENVIRONMENTAL OBLIGATIONS

Business activities have a significant impact on climate and the environment. Suppliers must aim to minimize the ecological footprint of their entire business and strive to become climate neutral. Suppliers must pledge to protect the environment by minimizing their environmental impact and working to preserve natural resources in all their operations and business activities. Our working partners must confirm that they have taken measures and have obtained the necessary approvals to comply with environmental regulations.

4. BUSINESS ETHICS

4.1. AVOIDING CONFLICTS OF INTEREST

Business decisions must always be made on a fair and impartial basis. Suppliers accepting, offering, or providing gifts, services or hospitality could leave them and GA Telesis open to accusations of unfairness, partiality, or deceit, and place our ethical reputation at risk. No gift, hospitality, entertainment, or other benefit should be accepted or provided if it will obligate, unduly influence, or appear to obligate or unduly influence the receiver.

4.2. INTEGRITY AND FAIR COMPETITION

When entering into business relationships with GA Telesis, suppliers must undertake to uphold fair business standards in advertising, sales and competition and maintain a high ethical standard in accordance with this Code and good business practice. Suppliers cannot violate any international anti-corruption conventions, applicable anti-corruption laws or regulations of the countries in which they operate, and cannot engage in any form of bribery or corruption, including without limitation extortion, embezzlement, or fraud in any form.

4.3. PROTECTING WHISTLEBLOWERS

Suppliers are expected to provide a complaint mechanism for employees to report workplace complaints and compliance violations in accordance with local laws and regulations without fear of retaliation. Suppliers are also expected to take action to prevent, detect, and correct any retaliatory actions.

5. GLOBAL & LOCAL TRADE PROTOCOLS

5.1. EXPORT CONTROLS

Trade embargoes and economic sanctions prohibit or severely restrict business activities with certain countries and their nationals, as well as business activities with specifically listed entities and persons. Suppliers must ensure strict compliance with all applicable US, UK, EU, and other applicable export laws and regulations and must provide regular training so that everyone is familiar with the key elements of such laws and regulations.

5.2. ANTI-CORRUPTION / ANTI-BRIBERY

No bribe may be provided, offered to or accepted from any person in exchange for recommending, purchasing or supplying products or for a commitment to continue to do so. Nothing may be offered, provided, or accepted in a manner or on conditions that would have an inappropriate influence on a person's action or conduct, or that would create the appearance of doing so.

Suppliers always must adhere to the highest levels of honesty, integrity and ethics when conducting business and must be in compliance with the United States Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act 2010 ("UK Bribery Act") and other applicable anti-bribery laws and regulations that prohibit making or promising to make payments for the purpose of obtaining or retaining business.

5.3. INSIDER TRADING

Suppliers may not use non-public information about any company or its business to trade in the company's stock or pass such information along to others so that they may do so.

5.4. RECORD KEEPING

Suppliers must maintain accurate, timely and complete financial records. These financial and accounting records serve as a basis for managing suppliers' businesses and are essential in fulfilling responsibility to shareholders and other business partners.

6. SANCTITY OF INFORMATION

6.1. PRIVACY & CONFIDENTIALITY

All suppliers must properly handle sensitive information, including confidential, proprietary, and personal information. Information cannot be used for any purpose other than the business purpose for which it was provided unless there is prior authorization from the owner of the information. In regard to protection of proprietary information, suppliers must comply with all applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

6.2. COMPANY PROPERTY, RECORDS, AND INFORMATION

Where applicable, suppliers must protect physical assets, including facilities, equipment, inventory and supplies from loss, theft, or damage. Suppliers must have protocols in place to protect the exclusive information of others, including personal information, from unauthorized access, destruction, use, modification, and disclosure.

6.3. INTELLECTUAL PROPERTY

Suppliers must respect and, when appropriate, protect intellectual property rights, including copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, and other intangible property.

7. GUIDANCE & ACKNOWLEDGEMENT

7.1. GUIDANCE

If you have any concerns regarding suspected violations of this Code or need help understanding this Code, applicable laws, or other requirements and how they apply in a particular situation, GA Telesis encourages you to contact us through our General Counsel. All reports and other communications will be kept confidential to the extent practicable.

7.2. ACKNOWLEDGEMENT

The undersigned has read and understood this Supplier Code of Conduct and agrees to comply with the terms hereof.

Supplier Name:

By: _____

Name:

Title:

Date: