



Code of Business Ethics

2026

Values of Airswift



Airswift operates in many institutional, economic, political, social and cultural environments that are in constant and rapid development. Due to the complexity of the situations in which we operate, it is important we define clearly the values that we accept, acknowledge and share, as well as the responsibilities assumed by everyone inside and outside of Airswift. For this reason, our Code of Business Ethics has been produced.

Our Code of Business Ethics lays down a stringent set of principles and procedures covering a range of matters where our integrity is required. It includes policies to prevent corruption and bribery, to maintain confidentiality in the business, to prevent conflicts of interest between the Company and those who work for it and with it, as well as helping people stay safe.

We at Airswift acknowledge that all activities must be performed in full respect of the law, in fair competition, with honesty, integrity and good faith, with due respect for the legitimate interests of our employees, shareholders, commercial and financial partners and the communities where we are present. The Code must be respected by every person working with Airswift and is of paramount importance for the good functioning, reliability and reputation of our business, all of which are crucial factors for our success.

I expect all those who work for or on behalf of Airswift to, without any distinction or exception whatsoever, be committed to respecting these principles in performing their roles and responsibilities, and to make sure that others respect them. The conviction that we are acting in favour or to the advantage of Airswift can never in any way justify acts or behaviour that conflict with these principles.

Airswift's integrity is essential to its success.

A handwritten signature in black ink, appearing to read "James Allen".

James Allen
Chief Executive Officer

Why Have a Code of Business Ethics?

Our Code of Business Ethics is our central point of reference for anyone associated with our business. It is a standard that we have set for ourselves to ensure that no matter where you are in the world you can be sure that anyone associated with Airswift will be morally just in their actions.

The Code of Business Ethics has been designed to assist our employees to comply with all laws and regulations governing our business, and outlines steps to prevent, detect and report any misconduct that may occur.

Our Values



Growth



Excellence



Life



Integrity

What Do We Expect?

Moral integrity is a constant duty for any person working for Airswift and characterises the conduct of our entire organisation. The Code of Business Ethics applies, without exception, to all personnel working for or on behalf of Airswift. The Code applies to all operations under group control.

Airswift's Business Ethics Officer is responsible for:

- Reporting all matters in relation to his/her work to the Board
- Ensuring that matters in relation to anti-bribery and corruption are also made known to and are available to the Quality & Compliance Manager (Global)
- Raising matters with the Board at his/her discretion
- Ensuring that the Company is aware of corruption issues and puts in place and maintains measures to prevent corruption by Airswift, its employees or those associated with it (including advisors, customers and suppliers), including the education and training of staff
- Ensuring that the Company's procedures and practices are adequate to prevent persons associated with Airswift from bribing and being bribed, and are kept up to date
- Conducting audits of Airswift's actions in this area and undertaking investigations
- Liaising with external bodies and advisors on matters to do with bribery and corruption
- Keeping up to date on developments concerning the law and practices concerning bribery and corruption issues

Country Managers/Department Managers are responsible for:

- Identifying bribery and corruption risks in their respective countries and/or departments
- Conducting due diligence as an element of corporate good governance
- Communicating, enhancing awareness and enforcement of the policies and procedures within their respective countries and/or departments

- Ensuring clear financial controls such as adequate bookkeeping, auditing and approval of expenditure
- Ensuring transparency of transactions and disclosure of information
- Reporting all matters in relation to bribery/ corruption to the Business Ethics Officer

All employees are responsible for:

- Preventing bribery and corruption within Airswift and respecting the principles outlined in the Code of Business Ethics in performing their roles and responsibilities
- Making sure that others respect the principles outlined in the Code of Business Ethics
- Reporting all matters in relation to actual or suspected bribery/corruption to the Business Ethics Officer

From Clients

We expect our clients to respect our Code of Business Ethics and to adhere to our working principles. If their guidelines are less stringent, we expect them to follow our code as a matter of course.

From Partners/Suppliers

Other parties, including consultants, agents or suppliers, who are engaged to work on behalf of Airswift will be made aware of the Code by the staff member engaging such party. We expect each of these parties to operate in compliance with the Code, with this commitment being a contractual requirement where possible.

Variations in local laws and customs

The Code sets out the business conduct requirements we expect regardless of operating location. Where differences exist as a result of local customs, norms, laws or regulations, the highest standard of behaviour should be applied. Any areas of doubt in this regard must be raised directly with the Regional VP, Business Ethics Officer or Group CEO.

What happens if I don't follow the code?

We have a zero-tolerance policy for breaches of the Code of Business Ethics. Any such breaches will be taken very seriously and may result in disciplinary action up to and including dismissal. For some breaches, applicable law may impose criminal penalties, fines and/or imprisonment.

Avoiding Conflict of Interest

What is a conflict of interest?

A conflict of interest occurs when an individual's private interest interferes in any way with the interests of the Company as a whole. By way of example, actual or potential conflicts of interest may arise in following situations:

- Economic and financial interest of employees and/or employee's family in activities of suppliers, contractors and competitors;
- Use of one's position in the Company, or of information acquired during one's work in such a way as to create a conflict between one's personal interests and the interest of Airswift;
- Performing any type of work for suppliers, contractors and competitors;
- Accepting money, favour or benefits from persons or firms that have, or intend to have, business relationships with Airswift

Resolving a Conflict of Interest

Airswift acknowledges and respects the right of employees to take part in investments, businesses and other kinds of activities, provided that these activities are not related to, and do not interfere with, the activities that such employees perform in the interest of Airswift, are permitted by law, and are compatible with the duties of being Airswift personnel.

However, Airswift personnel shall avoid any situation and activity where a conflict of interest may arise, or which can interfere with their ability to make impartial decisions in the best interest of the Company and in full accordance with the Code. Any situation that may constitute or give rise to a conflict of interest shall be immediately reported to your line manager. In particular, all personnel shall avoid conflicts of interest between personal and family activities and their tasks within the business. That is not to say that employees cannot hold stocks and shares in the companies which are Airswift's customers or suppliers. They can, but if they do and a staff member is working with such a customer or supplier, he or she will be expected to raise that with their manager.

Such an interest where it directly relates to a matter or project being worked on by a staff member should be made known to the Business Ethics Officer. If for any reason the staff member is not to continue to act on the matter, he or she will be informed of that by the Business Ethics Officer.

Engaging in Political Activities

In accordance with applicable laws, Airswift exercises its right and responsibility to make its position known on relevant issues. As an individual, you have the right to personally participate in the political process, including making personal political contributions. However, you need to make it clear that your personal views and actions are not in any way related to Airswift.

Under no circumstances is it acceptable to use Company funds to support any political agenda. If you are attending any demonstration or walk out, you must have the appropriate permissions. If you are unsure, please speak to your line manager or Airswift's Business Ethics Officer.



Global Business

Assessing Risks

Where Airswift identifies risks in its operations, we will assess those risks and, depending on the outcome of the assessment, further due diligence may be required. If we are not satisfied that the risks involved in the review can be mitigated, we will in some cases decline to do further business with those involved.

International Trade Sanctions

As a multinational company, Airswift must adhere to all trade sanctions and trade laws applicable in the jurisdictions in which we operate. The laws impose restrictions on with whom and where we conduct business. In particular, as we have a large presence in the USA and the European Union, we abide by the latest international sanctions lists updated by the US Office of Foreign Asset Controls (OFAC) and the UK Government's Office of Financial Sanctions Implementation (OFSI). Every new client and business opportunity is reviewed against our sanctions audit procedures to ensure Airswift operates in compliance with these programmes.

Money Laundering

Money laundering is the concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses. Airswift understands you will rarely be in a position to violate money laundering laws; however, you should be on the lookout for any suspicious payments and report them to the appropriate persons.

Human Trafficking and Forced Labour

Human trafficking is the act of recruiting, transporting, transferring, harbouring or receiving a person, through any coercive means (such as threat, use of force, deception or abuse) for the purpose of exploitation. Airswift has a zero-tolerance approach to modern slavery in its supply chain.

Forced labour is work or a service that is taken from a person under the menace of a penalty and for which the person has not offered themselves voluntarily. Airswift considers both to be highly immoral and believes that all workers should be treated with dignity and respect at all times. Airswift will do its utmost to ensure that its suppliers, partners, clients or contractors are not associated with any human trafficking or forced labour in any way.

Fair and Open Competition

Competition or antitrust laws are commonplace in global business and ensure that every business transaction is open and transparent. Airswift will not enter into any agreements that might restrict trade or even create the appearance that we have entered into any such agreement.

Government & Public Officials

Airswift has respect for governmental authority and maintains honest and ethical relationships with governments and their officials. All staff members and consultants must respect and obey the laws of the cities, states and countries in which we operate.

All information provided to government officials should be true and accurate and protective of the Company's legitimate business interests. In accordance with our zero-tolerance policy towards bribery and corruption, the giving of anything of value, directly or indirectly, to government officials or political candidates with a view to obtaining or retaining business or any other illegal payments is strictly prohibited.

The group makes no contributions or donations or equivalent for political purposes.

Facilitation Payments

Facilitation payments are small bribes paid to facilitate routine Government action. They are sometimes demanded in overseas countries and undermine corporate anti-bribery procedures such as this. The Government recognises the problems that commercial organisations face in some parts of the world and in certain sectors.

If asked for a "facilitation payment" or something of that nature, you should refuse to make any such payments, seeking justification for why the payments are necessary and commercially justifiable, pointing to Airswift's corporate position. Almost every country prohibits the bribery of its own officials. In addition, many countries have anti-bribery/anti-corruption laws that make it illegal to bribe officials of other countries.

Tax Evasion

Tax evasion is illegal and may involve practices such as understating turnover, overstating deductible expenses, false invoicing or backdating documents. Anyone associated with Airswift may not, directly or indirectly, be knowingly involved or allow Airswift to participate in any form of practice that would be construed as tax evasion.

Bribes (Federal Corrupt Practices Act – UK Anti Bribery Act 2010)

Each of these acts broadly describe bribery as the giving or offering of anything of value to government officials or others for the purpose of gaining or retaining a business advantage.



Prohibition on Improper Payments

Airswift employees and anyone acting on behalf of Airswift are prohibited from directly or indirectly making, promising, authorising, or offering anything of value to a government official or any other person on behalf of the Company in order to:

- Secure an improper advantage
- Obtain or retain business
- Direct business to any other person or entity

This prohibition includes payments to third parties where the Company employee or representative knows, or has reason to know, that the third party will use any part of the payment for bribes.

Reporting Suspected Violations

Any Company employee or person acting on behalf of the Company who suspects that this policy may have been violated must immediately notify the Business Ethics Officer.

Employees who, in good faith, report suspected legal, ethical, or policy violations will not suffer any adverse consequences for doing so.

When in doubt about the appropriateness of any conduct, the Company requires that you seek additional guidance before taking any action that may subject the Company to potential FCPA or UK Bribery Act liability.

Health, Safety & Environment

Health and Safety Compliance

Safety is one of the Core Values of Airswift. Airswift aims to provide and maintain a safe and healthy work environment for our employees, contractors, suppliers and guests. Every employee shares in the responsibility for health, safety and protection of the environment around them, and it is Airswift's goal to prevent any/all occupational accidents, injuries, and illnesses. Airswift understands that this will only be achieved by a full commitment to safety by all employees, from senior management down. It is the responsibility of every employee to promote safe working practices at all times throughout every phase of job operation.

Stop Work Authority

All Airswift employees have the authority and responsibility to stop any task or operation where there are concerns or questions regarding the health and safety of an employee, potential for loss, or a potential impact to the environment. The employee may exercise Stop Work Authority by raising to the appropriate authority, and employees should not return to work until the hazard has been effectively rectified.

Protecting the Environment

We at Airswift are constantly striving to reduce our environmental impact. We operate our facilities with the necessary permits, approvals and controls, and continue to learn more and better ways to go beyond compliance with the environmental laws and standards that apply to us. We recognise we have a key role and can have a positive impact on the environment by displaying good choices and using opportunities to encourage best practice. In this way, Airswift can help create more sustainable communities in which to live and work. Using the Reduce, Re-use & Recycle theory in all of our initiatives, we encourage all employees to come up with ideas and participate in environmental programs for each business unit.

Security in the Workplace

Airswift is committed to providing a secure environment for all personnel in our facilities and job sites. We are continuously working on enhancing our efforts around safety and security. Again, safety and security is everyone's responsibility; as a collective, we all can contribute to a secure work environment.

Weapons and Violence in the Workplace

Weapons of any kind that may be used to harm others are not permitted in any Airswift workplace, whether they be for personal or professional reasons.

Airswift does not tolerate any threatening remarks, gestures or physical violence directed towards anybody on any of its worksites or towards a colleague outside of working hours. Any disruptive behaviour that affects the workplace or any of its teams is deemed unacceptable.

Drug and Alcohol Free Workplaces

Employees have the responsibility to ensure that they are free from the influence of alcohol and drugs at the start and for the duration of their period of work. They must comply with the total ban on the consumption of alcohol by staff during the business hours of their place of work, including breaks.

Any employee taking over-the-counter or prescription medication must advise their supervisor/line manager so appropriate action can then be taken to check that the individual is safe to work and ensure they are working in a safe environment.

Transparency in Financial Transactions

Full Audit Trails

All Airswift employees are expected to cooperate fully with all internal and external audits. They must not give false or misleading information and should always endeavour to provide complete and accurate information. Employees should not destroy any record or document that may be used as part of an audit or investigation.



Accurate Accounting

The accuracy of Airswift's accounts depends on all of its employees inputting any information including changes and amendments correctly. All employees are required to verify any financial information provided before submittal. Senior management should take responsibility to ensure that appropriate financial controls are in place in all locations at all times.



Gifts and Hospitality

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices.

The purpose of business hospitality and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers.



No gift or entertainment should ever be offered, given, provided or accepted by any Company employee, director or officer, family member of an employee, director or officer, or agent unless it is for the right reasons.

Gifts and hospitality can be given and received as long as they are in accordance with our Anti-Bribery and Corruption procedure which mandates;

- Gifts are consistent with customary business practices
- Gifts are not excessive in value
- No cash or cash equivalent gifts
- The gift cannot be construed as a bribe or payoff
- The giving of a gift or hospitality does not violate any laws or regulations

IT Security/Data Protection

Data Protection

People working at Airswift have access to information owned by Airswift, its employees, and sometimes third parties.

This information may include:

- Financial data
- Business plans
- Technical information
- Employee and customer details
- Other sensitive data
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Unauthorised access, use, or disclosure of this information may damage Airswift or the third party. Therefore, you are not permitted to access, use, or disclose such information unless you have been properly authorised to do so.

Unauthorised access, use, or disclosure may also constitute a violation of laws, including privacy regulations.

Privacy & Confidentiality

Airswift has a wide variety of assets, including physical assets, proprietary information, and intellectual property. Employees are responsible for protecting the property entrusted to them and for helping to safeguard Airswift's assets in general.

To do this, you must be aware of and understand Airswift's procedures and how they help manage all Company assets appropriately.

Permissible Use of IT & Email

Airswift's IT resources, including communication systems and Internet connections, are to be used for conducting Airswift business or for other incidental purposes authorised by your line manager or applicable Group.

Access to Airswift's IT environment from any device or storage media (whether provided by Airswift or not) may be checked for:

- Installed software
- USB storage
- Firewalls
- Administrator information
- Additional network connections
- Encryption
- Anti-virus or malicious software

These checks are carried out for the purpose of protecting Airswift's business and detecting unacceptable use of IT resources.

Unacceptable use of Airswift's IT resources includes:

Processing, sending, retrieving, accessing, displaying, storing, printing or otherwise disseminating material and information that is:

- Fraudulent
- Harassing
- Threatening
- Illegal
- Racially or sexually oriented
- Obscene
- Intimidating
- Defamatory
- Otherwise inconsistent with a professional environment

Social Media

Any private use of social media must not breach confidentiality obligations and should not compromise Airswift's reputation or business interests.

Airswift requests that if you participate in social media you use good judgement and show respect towards your colleagues, business partners and communities. Also, you may not speak on Airswift's behalf unless authorised to do so.

Document and Record Retention

Airswift's business requires that we acquire and maintain personal and commercial information, documents and records.

Accordingly, we have policies in place to manage the retention and destruction of these records. These policies should be followed unless you are notified that the required documentation may be required for audit, investigation or litigation.

Treating Co-workers Fairly

Fair Employment Practices

Airswift is fully committed to ensuring that all employees, irrespective of level, are treated fairly and with due respect. Certain characteristics are 'protected characteristics' under equal employment laws and the protection given can apply where an individual is unfavourably treated in relation to their own characteristics or the characteristics of those associated with them (for example, their partner or child).

Airswift strictly prohibits and does not tolerate discrimination against employees, applicants, or any other covered persons because of race, color, religion, creed, national origin or ancestry, ethnicity, sex (including pregnancy), gender (including gender nonconformity and status as a transgender individual), age, physical or mental disability, citizenship, past, current, or prospective service in the uniformed services, genetic information, or any other characteristic protected under applicable law.

Equal Opportunities

This policy applies to all aspects of employment, including recruitment and selection, performance management, training, promotion, pay and conditions. We also extend our commitment to the communities in which we operate.

Harassment Free Work Place

Discrimination, bullying or harassment of any kind against colleagues or anyone with whom you deal with during your employment from Airswift will not be tolerated and could result in disciplinary action. We do not tolerate any form of abuse or harassment. This includes actions that can reasonably be considered as offensive, intimidating or discriminatory, as well as any form of sexual harassment.

Everyone who works with or on behalf of Airswift has a responsibility to ensure that this policy is properly observed and fully complied with. People around the world can live by very different belief systems (sometimes based on religious or political beliefs). You should never pass judgement on the way other people live their lives, and always show respect for other cultures and belief systems. If you are travelling for or on behalf of Airswift you should make yourself aware of local customs and adhere to any local etiquette.

Serious offences such as deliberate harassment will normally be regarded as gross misconduct and may result in disciplinary action



Diversity and Inclusion

We value and respect the differences between our people and strive to create a workplace where everyone feels seen, heard and understood. Working together in an inclusive environment enables us to harness the collective and complementary skills, knowledge, background and network of our people.

Valuing diversity and inclusion is an element of our culture and integral to our strategy to be a market leader delivering excellent service to our clients. It's also a responsibility and commitment shared by all Airswift employees.

Doing the Right Thing

Why is it important to raise concerns?

Airswift understands there will be occasions when wrongdoing occurs in the workplace. This is why encouraging employees and colleagues to raise concerns as part of normal day-to-day practice is important. When concerns are raised at an early stage, corrective action can be put in place to ensure bad practices or illegal activities can be halted before they escalate further. Our employees have both a right and a duty to speak up when they become aware of a potential issue.

Who should I talk to if I have a concern?

You should not bury concerns if you feel that reporting them would be disloyal to your colleagues, manager(s) or Airswift as a business. Airswift has an open reporting culture, that encourages and supports the reporting of concerns about misconduct, regulatory breaches or other malpractice. We have a structure in place for the voicing of those concerns. The most direct reporting option is your line manager, or a more senior manager in your department or region.

If you have a question about the requirements or policies in this Code, or are concerned that any violation of a Company policy is occurring or has occurred, report this immediately to any one of the following:

- Your line manager or supervisor
- Business Ethics Officer
- HR Department
- Regional Legal Counsel or General Counsel
- Airswift's Compliance and Ethics Hotline



Compliance and Ethics Hotline

Should you discover a situation that you believe would be best addressed through this process, you are free to decide to whom you should report the matter, based on their seniority or position within the Company.

Whomever you choose to make your report to, you can be assured of the Company's understanding and protection.

What will happen if I contact you with a concern?

Airswift's employees are empowered to bring to the attention of management any issues or areas of concern regarding unacceptable business conduct or unscrupulous activities, discretely and without fear of consequence. Employees who make a complaint in good faith should not be concerned about experiencing any adverse consequences for having done so. Our employees will not be penalised or retaliated against in any way with regard to their employment, nor harassed or threatened for reporting such concerns.

Matters reported to the Company will be treated in strictest confidence, subject to requirements of applicable law. The Business Ethics Officer will conduct a thorough investigation and report findings to Senior Management where appropriate. The Business Ethics Officer and relevant senior management will then decide on the appropriate course of action. The investigation will also aim to identify where controls failed and determine root cause, in order to decide the corrective action required to prevent re-occurrence. In cases where there is evidence of criminal behaviour, Airswift may bring that behaviour to the attention of the proper authorities.

Airswift acknowledges that it is never easy to report a concern, particularly one that may relate to an unlawful act. However, we strongly encourage you to come forward with any concerns at the earliest opportunity, so that matters can be dealt with promptly and effectively before problems escalate.

You may approach the Business Ethics Officer directly by emailing your concerns to: **confidential@airswift.com**. This email address is only accessible by the Business Ethics Officer.

Alternatively, you can call the Business Ethics hotline on: +44 (0) 800 260 6717 This hotline is also only accessible to the Business Ethics Officer.



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