

Universal Aviation

Supplier Code of Conduct

OVERVIEW

As an industry leader, Universal Aviation (UA) is committed to operating its business with honesty, fairness, and integrity. With over 60 years in the aviation services business, we are dedicated to working closely with third-party providers of goods and services to enhance our clients' experience worldwide.

We expect our third-party providers of goods and services (collectively, "Suppliers") to follow the standards set forth in this Code of Conduct (the "Code") when transacting business with, at the request of, or on behalf of UA and its subsidiaries and affiliates. The Code focuses on Regulatory Compliance, Data Privacy and Security, Business Practices and Ethics, Labor and Human Rights Practices, Compliance Monitoring, and Reporting and Notifications.

REGULATORY COMPLIANCE

Suppliers are expected to comply fully with applicable laws and regulations in the countries where they operate, and in addition:

- Comply with all economic sanctions, trade embargoes, export, re-export, and import laws and regulations.
- Comply with antitrust and fair competition laws.
- Refrain from participating in international boycotts not sanctioned by the U.S. government or applicable laws, including indirect participation through agents or subcontractors.
- Comply with the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and all applicable anti-corruption, anti-money laundering laws, as well as laws related to lobbying, gifts and payments to public officials, political and campaign contribution laws, and other regulatory requirements.
- Avoid offering or accepting bribes or kickbacks of any kind. UA prohibits all facilitation payments or tips paid on its, or its customers, behalf.

Failure to comply may result in suspension or termination of the supplier relationship and, where required, reporting to relevant authorities.

DATA PRIVACY AND SECURITY

Suppliers must comply with all applicable data privacy laws, including GDPR, CCPA/CPRA, Brazil's LGPD, and other relevant regional and national laws. Suppliers must also:

- Comply with data privacy and security requirements in their contract with UA.
- Maintain appropriate cybersecurity controls such as encryption, access management, and incident response procedures.
- Report any data security incident affecting UA's data within seventy-two (72) hours of discovery to ITSECURITY@UniversalAviation.aero.

BUSINESS PRACTICES AND ETHICS

Suppliers are expected to:

- Honestly and accurately record and report all business information, maintaining records for at least ten (10) years following delivery of goods or completion of services.
- Avoid conflicts of interest and prevent impropriety in dealings with UA employees and clients.
- Provide only modest, reasonable gifts, meals, and entertainment not exceeding \$100 (or local equivalent) per person, per year, unless otherwise approved by UA's Compliance Office.
- Protect UA's confidential, proprietary, and client information.
- Cooperate fully with UA's compliance investigations and audits and implement corrective action plans where deficiencies are identified.

LABOR AND HUMAN RIGHTS PRACTICES

Suppliers must:

- Provide a safe and healthy work environment and comply with health and safety laws
- Comply with all child labor laws and employ only workers meeting the legal minimum age.

- Prohibit harassment, discrimination, coercion, or inhumane treatment. Prohibit forced, involuntary, or slave labor and comply with the Modern Slavery Act 2015. Suppliers must ensure subcontractors also comply and certify their supply chains are free from such practices.
 - Provide wages and benefits that meet at least minimum legal requirements, paid on time and transparently.
 - Comply with applicable working hours laws and standards.
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COMPLIANCE MONITORING

- Suppliers must certify compliance with this Code on a risk-based frequency: at least annually for high-risk suppliers and biennially for low-risk suppliers.
 - Suppliers must maintain accurate documentation to verify compliance and provide it promptly upon request.
 - UA reserves the right to audit suppliers' books and records, with or without notice when legally required.
 - Failure to cooperate or provide accurate certifications may result in suspension, or termination.
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REPORTING AND NOTIFICATIONS

For questions, concerns, or to report violations:

Email: Chief Compliance Office (cco@universalaviation.aero)

Universal Aviation AlertLine: <https://universalalertline.com>

Website: www.universalaviation.aero - Telephone: 1-800-461-9330 (voice) - Telephone: 1-281-378-4183 (text)

SECURITY TEAM: ITSecurity@universalaviation.aero

Suppliers must notify UA within ten (10) business days of any material changes in ownership, beneficial owners, or legal status.

CONCLUSION

UA is committed to compliance, ethics, and human rights. We expect all suppliers to uphold these same standards. Violations of this Code may result in corrective action, suspension or termination of business, and may be reported to relevant authorities where required.