

Code of Ethical Conduct for Suppliers, Contractors, and Consultants

1. 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 United Nation's Universal Declaration of Human Rights and applicable law, including the United Kingdom's Modern Slavery Act 2015.

Our employees, officers and directors must conduct themselves in accordance with the Signature's **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 on our [website](#). (collectively, "**Ethical Conduct Policies**").

We expect our suppliers, contractors, and consultants (collectively, "**Suppliers**") to conduct business fairly, impartially, and in an ethical and proper manner. Suppliers must adhere to the principles of our Ethical Conduct Policies, including compliance with all applicable laws, fair business practices, respect for human rights, environmental stewardship, and the delivery of high-quality, safe products and services.

Suppliers are also expected to communicate and enforce these principles throughout their own supply chains. This may include implementing supply chain management processes that incorporate the requirements of this Code of Ethical Conduct.

2. SUPPLIER OBLIGATIONS

Each Supplier agrees:

- **Ethics; Improper Payments & Fair Dealing.** To uphold the highest standards of integrity in all business interactions; to maintain accurate books and records; to avoid corruption, extortion, embezzlement, or bribery (including promising, offering, giving or accepting); and to comply with all laws and regulations applicable to their business, including all relevant 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 all applicable environmental laws and regulations; to provide workers a safe and healthy workplace; to avoid adverse environmental impact; and to strive to reduce energy, waste and natural resource consumption through 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 lawful delivery of products and services.

- **Fair Employment Practices.** To comply with applicable laws and regulations governing wages, hours, and working conditions; to allow workers to choose freely whether to organize or join associations for the purpose of collective bargaining as permitted by local law; and to prohibit all forms of discrimination, harassment and retaliation.
- **Human Rights.** To respect the human rights of their own employees and those throughout their supply chain; to never use, support, or engage in forced or indentured labor, or practices involving coercion, deception, or abuse of power—including human trafficking, slavery and child labor; to comply with all applicable laws and regulations relating to the prevention of human slavery, human trafficking, and child labor; and to implement policies and controls 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's confidential and proprietary information; and to comply with all laws and directives providing for the protection, transfer, access, processing, and storage of personal information.
- **Intellectual Property.** To respect the intellectual and other property rights of Signature and third parties, including all patents, trademarks, copyrights, and other proprietary rights.
- **Competition Law.** To comply with all applicable competition (antitrust) laws; and to refrain from coordinating conduct with others in ways that improperly restrict competition.
- **Controllershship.** To ensure that all invoices, custom forms, or similar documentation submitted to Signature or to governmental authorities (or audited by third parties in relation to transactions involving Signature) accurately describe the goods and services provided and their pricing; and to ensure that all records, communications, and financial reporting are accurate and honest.
- **Conflict of Interest.** To notify Signature of any actual or potential conflicts of interest as soon as they are identified.

3. RESPONSIBILITY

All Suppliers are expected to self-monitor their compliance with this Code of Ethical Conduct and maintain a management system designed to ensure compliance with its principles and all applicable laws and regulations. Suppliers must identify and mitigate operational risks and are expected to promote continuous improvement of their business operations.

Signature will assess its Suppliers' compliance with the commitments outlined in this Code and in our Ethical Conduct Policies. Violations of these commitments may result in consequences up to and including termination of the business relationship.

If any Supplier has cause to believe that any team member or representative of Signature has engaged in improper or unethical behavior, or if the Supplier itself has violated this Code or the Ethical Conduct, we expect the Supplier to report such concerns to Signature's Ethics Hotline, a senior executive of Signature, and/or a member of Signature's Legal Department. A report to Signature's Ethics Hotline may be submitted at <https://signatureaviation.alertline.com>.

Supplier Policy	Title: Code of Ethical Conduct for Suppliers, Contractors, and Consultants		
	Function: Legal		
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	Owner: Chief Legal Officer	Approver: Board of Directors	Page 3 of 3