



International Trip Support

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## **CODE OF BUSINESS CONDUCT EXPECTATIONS FOR SUPPLIERS AND OTHER THIRD-PARTY BUSINESS PARTNERS**

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## 1. Scope

This policy applies to all external parties doing business with, or on behalf of, United Aviation Services FZCO and its consolidated subsidiaries (“UAS”). This policy does not apply to customers.

## 2. Summary

This policy outlines UAS’s expectations for ethical behavior and legal compliance by its business partners, including suppliers, external agents, resellers, alliance partners and others. The expectations are in line with internationally recognized platforms for socially-responsible corporations, including the United Nations Global Compact Principles, the International Labour Organisation, and the Global e-Sustainability Initiative.

This policy is also in line with the UAS Code of Business Conduct for UAS’s own employees. We are not asking our business partners to adhere to any expectations that we do not hold ourselves to, and we do not expect our business partners to engage in any conduct or behavior that we would not engage in ourselves.

## 3. Policy

It is UAS’s expectation that all business partners will understand and abide by the key principles outlined in this policy when conducting any business with, or on behalf of, UAS.

### A. Anti-Corruption:

All business partners must conduct all of its operations and activities in complete compliance with the U.S. Foreign Corrupt Practices Act of 1977, as may be amended from time to time (the “**FCPA**”), the U.K. Bribery Act 2010, as may be amended from time to time (the “**Bribery Act**”) and other relevant anti-corruption laws, including the local laws in countries where the company operates (collectively, the “**anti-corruption laws**”).

### B. Labor:

All business partners must comply with all local and international laws relative to employment matters.

- No person is employed who is below the minimum legal age for employment.
- Persons under 18 years of age are not engaged in hazardous work.



- Workers are free to leave their employment at will and are not subject to conditions of servitude or personal control.
- Employers shall not impose unreasonable restrictions on workers' freedoms to associate with one another or with responsible external workplace organizations.
- Working hours must comply with local laws and not be excessive on a regular basis.
- Reasonable pay shall be provided commensurate with the work performed.

**C. Work Environment:**

All business partners must comply with all local and international laws relative to health, safety and environmental matters.

- Workers must have access to clean toilet facilities, drinkable water and sanitary facilities for food storage.
- When employees must travel overnight for work purposes, company-provided accommodations shall be clean, safe and meet the basic needs of employees.
- Health and safety information and training shall be provided to employees periodically.
- Controls shall be in place to minimize the release of harmful emissions to the environment.
- Appropriate measures shall be in place to improve the environmental performance of products and services.

**D. Workplace Conduct:**

All business partners must comply with all local and international laws and ethical expectations relative to workplace conduct and behavior, nondiscrimination and respect for individuals.

- Individuals shall not be subject to any form of discrimination relative to a person's state of being, (*e.g., race, ethnicity, gender, age, religion, sexual orientation, gender identity*).
- Disciplinary practices and procedures shall be fair and consistently applied.
- Employees shall be treated with respect and dignity. Violations or abuses of any basic human rights will not be tolerated.



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- Physical or verbal abuse or other harassment and any threats or other forms of intimidation are prohibited.
- Sexual harassment of any kind will not be tolerated.
- Bribes, facilitating payments or favors of any kind, intended to obtain, retain or influence business decisions are prohibited.

UAS may periodically seek information about fulfillment of these expectations and expects its business partners to provide cooperation and information in response to reasonable requests relative to implementation of these principles.

**E. Business Partner Acknowledgment:**

In many business relationships, UAS will require a formal acknowledgment of this policy by the outside business partner. Signed forms can be sent to your UAS business contact or to the following email address: [compliance@uas.aero](mailto:compliance@uas.aero).

**4. References**

- Global e-Sustainability Initiative ([www.gesi.org](http://www.gesi.org))
- International Labor Standards ([www.ilo.org](http://www.ilo.org))
- United Nations Global Compact Principles ([www.unglobalcompact.org](http://www.unglobalcompact.org))