

Business Ethics and Code of Conduct

General Principals

The successful business operation and reputation of MSP Aviation is built upon the principles of fair dealing and ethical conduct of our business and employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of our company is dependent upon our customers' trust and we are dedicated to preserving that trust. Employees owe a duty to our company, its customers, and shareholders to act in a way that will merit the continued trust and confidence of the public.

We will comply with all applicable laws and regulations and expect our directors, officers, managers, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

Health and Safety

The company is committed to providing a safe and healthy working environment for all its employees both on and off its sites. There is a program of regular health and safety audits and safety training. The company applies its standards to all visitors to its sites.

Environment

The company respects the environment and the need to protect it and minimize the impact its operations have on it. It is engaged in a continuous program of improvement on environmental issues.

Employees

All employees are treated with dignity and respect with equal employment opportunities given to all irrespective of their race, religion, gender, sexual orientation, maternity, marital status, family status, disability, age, or national origin. Employees are offered a safe and healthy workplace and the company will not tolerate any form of harassment.

Customers

The company will take all reasonable care to avoid misleading statements, concealment, and overstatement in all its advertising and public statements. It will seek to build long term partnerships with its customers by being always honest and straightforward in its dealings. It will respect the confidentiality of any information it may obtain in relation to its customers.

Suppliers

Suppliers will be chosen based on factors such as price, quality, delivery, service, and integrity. The company's choice of suppliers will be made objectively. Honesty and openness will be paramount in the company's dealings with its suppliers.

Competitors

The company will build its reputation based on its performance alone. It will compete vigorously and lawfully and will not compete unfairly with others. It will not seek to damage the reputation of its competitors either directly or by implication.

Government, Regulators, and Legislators

The company will seek to comply with all international, national, and local legislation affecting its operations. It will strive to follow the best practice in corporate governance. It will meet its tax obligations. It will not make any financial contributions or offer support to any political party.

Giving and Receiving Gifts and Entertainment

Employees will neither seek nor accept for themselves or others any gifts, favors, or entertainment without a legitimate purpose from any person or business organization that does or seeks to do business with, or is a competitor of MSP Aviation. Gifts, favors, and entertainment may be given to others at the expense of the company if these are consistent with customary business practice and are not excessive in value.

Bribes and Corrupt Practice

The company does not allow the direct or indirect offer, payment, solicitation, or acceptance of bribes in any form. The company has a separate Bribery Policy in place which examines in detail the procedures all employees must follow to avoid involvement in any situation which might lead to the offer of bribes. The

policy makes it clear that any employee found to be involved in any kind of corrupt practice is likely to be immediately dismissed and may well have committed a criminal act which could lead to prosecution.