



SALTCHUK AVIATION FAMILY OF COMPANIES

Supplier Code of Conduct

The Saltchuk Aviation, LLC (SA) Family of Companies and Brands:



Saltchuk Aviation Family of Companies Values

We are Safe.

- **We put safety first.** Nothing is more important than having every one of us go home to our families without having been injured at work.

We are Reliable.

- **We take care of our customers.** We deliver reliable and dependable service to our customers. To make this happen, we recruit and employ people who share our values, continually reinvest in our assets, and work hard to improve our business every day.
- **We conduct business with honesty and integrity.** Fair and open dealings with others are the cornerstone of the way we interact with each other, our customers, vendors, and stakeholders. We are always honest and ethical in the performance of our Company's business and meet the highest standards of business behavior. We believe that ethical conduct is an important part of achieving operational excellence and financial success.

We are Committed.

- **We are committed to each other.** Our collective success depends on the dedication and engagement of each of us. We take pride in exceptional performance. We work to create opportunities for growth and advancement. We are building a supportive, mutually respectful culture that helps us achieve our shared goals through strong teamwork. At Saltchuk Aviation, we want each of our companies to be a place where we would be proud for our children to work.
- **We are committed to protecting the environment.** We operate in a way that minimizes negative impacts on the environment. Our goal is to be an industry leader and innovator in our stewardship of the environment.
- **We are committed to our communities.** We take pride in being good corporate citizens. We intend to be an economic and social asset in every community we touch.

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Introduction to the Saltchuk Aviation Family of Companies

Supplier Code of Conduct

The Saltchuk Aviation Family of Companies (SA) is committed to conducting business with integrity and strives to always engage in the highest ethical practices in all of our activities, including source selection, negotiation, award decisions, and administration of purchasing and sourcing activities. We seek to establish mutually beneficial, long-term relationships with business partners who help our business and share our values. This Supplier Code of Conduct explains our expectations and provides guidance for meeting those expectations and for reporting issues of concern.

This Code applies to all Suppliers, as defined below. The Saltchuk Aviation Family of Companies requires Suppliers and their employees, agents, and subcontractors to comply with the Saltchuk Aviation Supplier Code of Conduct and with the laws of the countries in which they operate. For example, in the United States this includes the Foreign Corrupt Practices Act and laws and regulations set forth by the Coast Guard, Occupational Safety and Health Administration, Treasury Department, Justice Department, Department of Transportation, and the Environmental Protection Agency. Suppliers who do not follow the letter and spirit of this Code, the law, and all relevant policies run the risk of jeopardizing their relationship with the Saltchuk Aviation Family of Companies, including termination of the relationship. The Saltchuk Aviation Family of Companies also expects Suppliers to have training and communication procedures in place to ensure that workers understand the standards in this Code. And, it is the Supplier's responsibility to ensure that its employees, contractors, or agents comply with this Code. If any issue or concern comes to light during our relationship, it should be reported to a member of Saltchuk Aviation Family of Companies management or the SA contract compliance officer immediately.

Throughout this Supplier Code of Conduct ("Code"), "Saltchuk Aviation, LLC", "Saltchuk Aviation," "Company," "Saltchuk Aviation," "Saltchuk Aviation Family of Companies", "and "SA" are used to refer to Saltchuk Aviation, LLC, and each and all of its subsidiary companies, including Aeko Kula, LLC dba Aloha Air Cargo and/or Aloha Tech Ops, Northern Air Cargo, LLC; StratAir, LLC; StratAir Puerto Rico, LLC; StratAir Aviation Services, LLC; Northern Air Maintenance Services, LLC; NAS Aircraft Leasing Company, LLC; and Saltchuk Aviation Shared Services, LLC. "Suppliers" refers to all of Saltchuk Aviation Family of Companies' suppliers, agents, business partners, consultants, contractors, vendors, and licensees that are working on Saltchuk Aviation Family of Companies behalf.

Questions, Concerns, and Reporting

How to Raise Concerns and Report Violations

The Saltchuk Aviation Family of Companies expects our Suppliers and other third-parties to report known and suspected violations of this Code, laws, regulations, and rules. In order for the Company to correct inaccuracies and unethical or illegal conduct as soon as possible, report the matter to your manager, a member of senior management or the SA contract compliance officer (Ann Campbell, Chief Administrative Officer, **907-249-5163**). Suppliers are required to cooperate with any investigation or audit and share information openly and honestly as necessary.

Ethics Hotline

In addition to the reporting avenues discussed above, Suppliers and their workers may also contact our Ethics Hotline at **1-800-270-7513 (Toll-Free Domestic US)**, **1-206-736-7020 (International or Other US)** or www.saltchuk.com/HOTLINE to share information about known or suspected incidents or violations. The hotline is hosted by a third party and is available 24 hours a day, seven days a week. Suppliers may report anonymously, where local laws allow. We investigate all reports of misconduct, and every effort will be made to ensure confidentiality during and after the investigation.

Protection From Retaliation

The Saltchuk Aviation Family of Companies strictly prohibits acts of retaliation against any Supplier or individual for reporting a possible violation in good faith. “Good faith” does not mean that you must be positive that your report is correct, but rather that you are providing all of the information you have and that you believe it to be true at the time you report.

Operating Safely

Adhering to Safety Procedures

Safety is the core of the Saltchuk Aviation Family of Companies' business, and we take it very seriously. Everyone in the Supplier's workplaces must adhere to the applicable safety laws and regulations. This means—but is not limited to—ensuring that workers use appropriate protective equipment and operate only the authorized equipment they have a business reason to use.

Workers should be fully certified, authorized, and capable of performing their job duties. We expect our Suppliers to ensure a safe working environment for their employees and to have Injury and Illness Prevention Programs in place. When accidents do occur on the premises of, or while performing work for, a Saltchuk Aviation Company, Suppliers must report them immediately to the Company and to appropriate agencies (for example, OSHA). Suppliers must also agree to share their safety records with the Company upon request.

Suppliers' commitment to safety should extend to never tolerating any threats or acts of violence, including intimidation, bullying, and attempts to instill fear in others. Note that weapons are not allowed on any Company property or inside the Company facilities—unless the Company is required by local law to allow an individual to possess a weapon on Company premises.

Protecting the Environment

Suppliers must comply with all environmental laws and regulations and conduct their operations in an environmentally responsible manner. We encourage Suppliers to minimize the use of non-renewable resources, reduce and recycle waste, and minimize the environmental impact of their operations where possible.

Enforcing Drug and Alcohol Policies

Suppliers' workers may never come to work at a SA Company facility under the influence of alcohol, illegal drugs, or misused prescription medication, and Suppliers should have appropriate drug and alcohol policies in place. Since some SA Companies are regulated by state and federal transportation laws that impose strict drug and alcohol regulations, it is the Supplier's responsibility to know and follow these laws.

Showing Respect for Others

The Saltchuk Aviation Family of Companies promotes workplaces where everyone is treated with respect and dignity. As part of this commitment, the Company abides by all applicable employment laws, including wage and hour laws, and expects Suppliers to do the same.

To be clear, conduct that creates an intimidating, offensive, or demeaning environment for another person, whether through verbal remarks, physical advances, bullying or visual displays, is never acceptable. We expect our Suppliers to ensure that their employees do not engage in harassing conduct.

Likewise, organizations are made stronger by respecting and fostering a diversity of backgrounds, cultures, and opinions. For this reason, we do not work with Suppliers who condone discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on a legally protected trait, including, race, age, gender, sexual orientation, gender identity, gender expression, national origin, disability, veteran status, economic status, marital status, political ideology, religious beliefs, or genetics.

Suppliers must report any such conduct committed by any Company employee to the Company's senior management, or the Ethics Hotline,

Securing and Properly Using Company Resources

Protecting Company and Customer Property

The Saltchuk Aviation Family of Companies may entrust Suppliers with valuable and costly items—such as machinery, equipment, computer systems, and vehicles. This equipment must be used only for intended and authorized business purposes. Suppliers must not leave sensitive information, equipment, or other assets or property in places where they could be lost, stolen, damaged, or inappropriately accessed.

Safeguarding Confidential Information and Intellectual Property

Suppliers with access to confidential Company business information may not disclose that information to other parties without the Company's consent. This includes pricing, costs, customer or employee lists, operating systems, policies and practices, and engineering and technical information that is not readily available to the public. Confidential information must be adequately safeguarded from loss, theft, damage, or disclosure to any unauthorized parties—regardless of location. An “unauthorized party” is one that does not have a legitimate business reason and permission to know the information.

Be particularly cautious in your use of social media or handheld devices capable of capturing or disseminating information while on Company premises. Anyone who works on behalf of Saltchuk Aviation Family of Companies must protect the company from even the inadvertent disclosure of confidential information and intellectual property.

Securing Privacy of Personal Information

Suppliers with access to Company employees' personal information must ensure that such information is adequately safeguarded in accordance with all applicable data privacy and information security laws and regulations. Suppliers must implement appropriate measures and internal controls for paper records, computer systems, portable electronic devices, laptops, and other storage devices to assure the protection of this information. Suppliers must immediately notify the Company of any actual or potential data security breach involving the Company or its personal information.

Maintaining Appropriate Business Conduct

Managing Accounting and Business Records

All financial books, records, and accounts must accurately reflect the terms of the contract and conform both to generally accepted accounting principles and internal controls. Any suspected fraud or financial irregularities involving a SA Company must be reported to the Company's senior management, the SA contract compliance officer, or to the Ethics Hotline. Suppliers must create, retain, and dispose (if necessary) of business records in full accordance with applicable legal and contractual requirements. This information should be readily available to the Company when needed or upon request.

Avoiding Conflicts of Interest

Suppliers' workers and their family members cannot receive—or appear to receive—improper benefits through the relationship with the Company or allow other activities to conflict with our relationships. A conflict of interest exists any time there is a choice between a personal interest (financial or otherwise) and a Company interest. Conflicts can arise in many situations; however, some common examples include:

- Suppliers that employ or are partially or fully controlled by a Company employee or an employee's family member, or where the Company is the Purchasing Agent for Supplier's services
- Improper benefits (such as loans or favors) that the Supplier, a worker, or a family member receives through the relationship with the Company
- Acting upon information learned through the relationship with the Company to gain an improper benefit or take advantage of a business opportunity that belongs to the Company

Suppliers are expected to disclose conflicts of interest to the SA contract compliance officer for review. This should be done before entering into any business transaction that could result or be seen as a conflict and should include potential conflicts that could arise during the course of work. Having a conflict is not necessarily a violation of this Code, but not disclosing an emerging or recent conflict is a violation.

A "family member" includes a spouse, domestic partner, significant other, parent, child, grandchild, or in-law.

Exchanging Appropriate Gifts and Entertainment

While exchanging customary business courtesies is appropriate, giving or receiving a gift or offer of entertainment is not appropriate if it is extravagant, creates a sense of obligation or the appearance of bias, or is done with the intent to influence a business decision. To this end, neither workers nor their family members may give or receive lavish or extravagant gifts, including:

- Equipment
- Cash or cash equivalents such as gift cards, vouchers, or loans
- Discounts
- Favored personal treatment

Accepting a small memento, such as a coffee mug, t-shirt, or other nominal gift, is permitted providing that the circumstances are customary and giving or receiving the gift is legal under all applicable laws.

As discussed above, for guidance on whether to give or receive a particular item, please disclose or discuss the matter with the SA contract compliance officer.

Understanding Antitrust and Promoting Fair Competition

Suppliers are expected to comply with all applicable antitrust and competition laws and regulations, and may not make any express or implicit agreements that violate the letter and spirit of these laws. We also expect our Suppliers to be vigorous and truthful in any sales and marketing activities undertaken on the Company's behalf.

Complying With Anti-Corruption Laws

Suppliers must not tolerate, permit, or engage in bribery, embezzlement, extortion, kickbacks, or other forms of corruption, either directly or through an agent. Suppliers will conduct business in full compliance with laws that govern the jurisdictions in which they conduct business, including those dealing with antitrust, bribery, kickbacks, corruption, the U.S. Foreign Corrupt Practices Act, and other prohibited business practices.

Similarly, the Company does not condone, facilitate, or support money laundering, which includes any attempt to conceal illicit funds or otherwise make these funds appear legitimate. Such activities are highly destructive to the marketplace and our business relationships and are not tolerated by the Saltchuk Aviation Family of Companies.

Handling International Trade With Integrity

We are subject to global trade laws, including exports and re-exports from the U.S. and other countries, as well as national and multinational sanctions and regulations. Violations of trade control laws, including failing to obtain export licenses or permits, can have severe consequences for Saltchuk Aviation and the organizations and individuals involved. Suppliers must ensure that they comply with all trade control laws.

Auditing and Inspecting

The Saltchuk Aviation Family of Companies reserves the right to conduct audits and inspections to verify that a Supplier's business operations meet the expectations outlined in this Code. Such audits and inspections may include review of financial information, safety records, facilities, housing accommodations, policies or other documentation as necessary and allowed by local law. Remediation plans may be developed for significant deficiencies, and failure to address significant deficiencies within a reasonable time may result in cancellation of contracts. In addition to any other rights Saltchuk Aviation may have under its agreement with the Supplier, the Company may request the immediate removal of any employee or representative who behaves in a manner that is inconsistent with this Code, a Company policy, or the law.

Acknowledgement

Suppliers must not under any circumstances:

1. Collude or offer facilitation payments, bribes, gifts or benefits to the Company or anyone acting on the Company's behalf. All Vendors must report any such offers.
2. Place any undue pressure on Company employees or other personnel acting on the Company's behalf to execute their work in a manner other than as directed by the Company.
3. Request, demand, or otherwise place undue pressure on Company personnel or other personnel acting on the Company's behalf to amend inspection or audit results or other business records.
4. Interfere with Company personnel or its designated vendor during audits or inspections.

Suppliers agree:

1. To acknowledge and follow the Saltchuk Aviation Family of Companies Supplier Code of Conduct.
2. To report any actual or possible conflict of interest to the SA contract compliance officer or to the Ethics Hotline.
3. To provide a safe environment where Company employees and others acting on the Company's behalf can work freely, efficiently, and constructively.
4. As requested by the Company, to allow unannounced inspections and audits to verify compliance with the Saltchuk Aviation Family of Companies Supplier Code of Conduct and to sign reports acknowledging the findings and results of the inspections and audits.

Suppliers may directly contact the Saltchuk Aviation Family of Companies senior management, or the SA contract compliance officer (Ann Campbell, SA Chief Administrative Officer, **907-249-5163**) with any questions and or concerns.

The Ethics Hotline number is **1-800-270-7513 (Toll Free Domestic US) or 1-206-736-7020 (International or Other US)**, or you may go online at www.saltchuk.com/HOTLINE. This service is operated by an independent third-party and is available **24 hours a day 7 days a week** and your identity may remain **anonymous**, as allowed by local law.

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Supplier Certification

Please complete the following certification, return a copy to the Company, and retain a copy for your records.

Entity Name: _____

Office Address: _____

I represent that _____ (Entity name) reviewed, understands, and agrees to follow this Saltchuk Aviation Family of Company Supplier Code of Conduct (“Code”). We understand that our questions concerning the Code can be directed to a member of senior management, the SA contract compliance officer or to the Ethics Hotline.

I further certify on behalf of _____ (Entity Name) that:

1. We have not violated any provision of the Saltchuk Aviation Family of Companies Supplier Code of Conduct.
2. We are not aware of any violation of the Saltchuk Aviation Family of Companies Supplier Code of Conduct by others.
3. We know the telephone number for the Ethics Hotline is **1-800-270-7513 (Toll-Free US) or 1-206-736-7020 (International and Other US)**.
4. We know the telephone number for the SA contract compliance officer is **1-907-249-5163**
5. We know that the Compliance Web address is **www.saltchuk.com/HOTLINE**.
6. We do not have a Conflict of Interest with SA, except for *[if none, please state none below]* :

We are not currently, nor in the past have we or relate to a non-U.S. Government official or entity, except for that disclosed below *[if none, please state none below]*:

Name: _____

Signature: _____

Title: --- _____

Date: _____