



De Havilland Aircraft of Canada Limited

Supplier Code of Conduct

October 2022

A. Introduction and Purpose

De Havilland Aircraft of Canada Limited (“DHC”) is committed to ethical business practice. Our goal is to demonstrate the best practices with regard to ethics and integrity in all of our dealings with customers, suppliers, governments and other stakeholders. This is a corporate priority and a shared responsibility by DHC and its respective affiliates, including De Havilland Flight Operations Limited, Longview Aviation Asset Management Corp., Longview Aviation Capital Corp., Longview Aviation Services Inc., Longview Distribution Services Limited, Viking Air Limited, Viking Aerospace US Limited and 2219292 Alberta Limited (operating as Pacific Sky Training) and such other owned and/or managed subsidiaries as designated by DHC from time to time (collectively, the “DHC Entities” or the “company” and individually, a “DHC Entity”), including the DHC Personnel (as the term is defined below) of each of the DHC Entities.

Consistent with the DHC Code of Ethics and Business Conduct that applies to our employees, this Supplier Code of Conduct (the “Supplier Code”) is based upon generally accepted standards of ethical business conduct. For the purposes of this policy, “suppliers”, “third parties” or “third party agents” include suppliers, representatives, consultants, contractors, agents, sponsors, joint venture partners, advisors and any other party and their respective employees who are working on behalf of any DHC Entity, whether as agents or independent contractors and further includes third party business associates, intermediaries or individuals to which a DHC Entity may outsource its services, processes or any business activity, including their respective subcontractors and employees.

We expect our suppliers to comply with this Supplier Code and all applicable laws and regulations wherever they operate and to cause their affiliates, suppliers, employees and contractors to perform obligations for the DHC Entities consistent with the standards set out in this Supplier Code.

In the event that this Supplier Code imposes stricter requirements than local laws or regulations, or in the event that local laws or regulations impose stricter requirements than this Supplier Code, we expect our suppliers to comply with the stricter requirements.

For purposes of greater certainty, the obligations set out in this Supplier Code are in addition to, and do not limit, suppliers’ obligations to any of the DHC Entities under any agreements with any of the DHC Entities.

B. Ethics & Legal Compliance

(i) Business Integrity

Our suppliers are required to comply with this Supplier Code and are expected to maintain high standards of ethics, professionalism and honesty in all their interactions with employees, customers, shareholders, suppliers, governments and the community, and comply with all applicable federal, provincial, state and local laws.

(ii) Anti-Bribery & Anti-Corruption Compliance

Our suppliers are expected to comply with all applicable laws in the jurisdiction in which they operate regarding bribery and corruption and refrain from engaging in any form of corruption, including kickbacks, extortion and the promising, offering, approving, giving or accepting of payments or gifts that are, or could be viewed as, an attempt to influence an individual’s actions, business decision or creating a sense of obligation. Each of the DHC Entities prohibit facilitation payments, even if they may not be illegal in a particular jurisdiction. Facilitation payments are typically small, unofficial payments, made to secure or expedite the performance of a routine government action by a government employee or official, such as providing routine police protection or processing permits.

(iii) Fraud

Suppliers must act with integrity in all their dealings and must not engage in any type of fraudulent activities.

(iv) Conflicts of Interest

Our suppliers are naturally involved in business relationships with people and organizations in addition to our suppliers' relationship with the DHC Entities. It is expected that these relationships will not, and will not reasonably appear to, compromise suppliers' relationship with the DHC Entities or suppliers' ability to make impartial and objective business decisions in connection with the supply of goods and/or services to the DHC Entities.

(v) Fair Competition and Anti-Trust Laws

Our suppliers are expected to adhere to fair business practices and to comply with all applicable laws in the jurisdiction in which they operate relating to marketing/anti-spam, competition standards and advertising.

(vi) Intellectual Property Rights

Our suppliers are expected to respect the intellectual property rights of each DHC Entity and others, and to comply with their contractual and other obligations pertaining to intellectual property rights.

(vii) Data Privacy

Suppliers must abide by all applicable data privacy laws and regulations when handling any personal information concerning the employees and clients of any of the DHC Entities. Suppliers must immediately report unauthorized use, disclosure, or loss of DHC personal information to the DHC Compliance Office at dhc.compliance@dehavilland.com

C. Labour

(i) Respect and Dignity

Our suppliers are expected to be committed to a workforce free of harassment and unlawful discrimination and they are expected to refrain from engaging in discrimination based on race, national or ethnic origin, religion, age, sex, gender identity, sexual orientation, marital status, family status, medical test results, disability or conviction for which a pardon has been granted or in respect of which a record suspension has been ordered.

Each of the DHC Entities support diversity and employment equity. Suppliers must offer equal employment opportunities and fair compensation (e.g. minimum wage, maximum hours of work, days of rest) without any discrimination.

(ii) Child labour

We will not engage in nor support the use of child labour and will not tolerate the use of child labour by our suppliers. For the purpose of this Supplier Code, child labour covers all type of work carried by employees under the age of 15 years old, excluding when such employment forms the basis of vocational training or takes form of educational program. However, for employment or work which by its nature or circumstances is not suitable for a person under the age of 18 years old, child labour shall mean employees under the age of 18 years old.

(iii) Freely Chosen Employment

It is expected that all work for our suppliers is voluntary, and workers are free to leave at any time or terminate their employment. Forced or involuntary labour, slavery or trafficking of persons shall not be used by any of our suppliers. This includes transporting, harbouring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. While workers may be asked to provide government-issued documentation as identification, it is expected that they will not be required to surrender government-issued identification, passports or work permits as a condition of employment.

(iv) Freedom of association

Suppliers must acknowledge and respect the principle of freedom of association and the right to collective bargaining of their employees.

D. Health & Safety

Our suppliers are expected to comply with all applicable health and safety laws and perform all services in a diligent manner in respect of health and safety matters. Furthermore, suppliers must take appropriate action, such as implementing and enforcing policies, standards, procedures, contingency measures and management systems, in order to prevent occupational illnesses and work-related accidents, and to provide a safe and healthy workplace for its employees; and provide the applicable DHC Entity with the necessary documentation and data to help ensure the safe and healthy use by the applicable DHC Entity and its stakeholders of the supplier's products. Where appropriate, our suppliers are expected to implement and train their workers on policies, programs and procedures to address the health and safety matters applicable to each supplier's workplace.

It is expected that our suppliers require their workers to report fit for work, such that their ability to work safely is not impaired for any reason. Their workers should be free of the negative effects of alcohol, drugs, medications or any other substance that could cause impairment.

E. Environment

Our suppliers are expected to strive to reduce the impact of their activities and of the performance of their products on the environment. Additionally, our suppliers are expected to strive to adopt standards, procedures, contingency measures, and management systems to ensure that their operations are managed safely, ecologically and in a sustainable way. At a minimum, suppliers must comply with all applicable environmental laws and regulations, in each case, applicable to each supplier's products or operations, and to provide data necessary for each DHC Entity and its customers to meet its environmental compliance obligations.

F. Governance and Implementation

We may verify each of our suppliers' compliance with this Supplier Code. Such verification may be conducted by way of a supplier's self-evaluation or an audit by or on behalf of the applicable DHC Entity who may visit a supplier's facilities with appropriate prior notice (when practicable in the circumstances).

DHC encourages its suppliers to implement policies, procedures, tools and indicators necessary to ensure compliance with the principles listed above. Furthermore, suppliers are expected to manage, monitor and develop their own supply chains in such a manner to ensure compliance with the requirements under this Supplier Code

Compliance with this Supplier Code is an important criterion that is taken into consideration our selection of suppliers.

G. Anonymous Reporting & Reporting Concerns

We expect our suppliers to provide their employees and business partners with access to adequate reporting channels to raise legal or ethical issues or concerns, including, without limitation, reports of a violation of this Supplier Code by our suppliers or their business partners, without fear of retaliation, including opportunities for anonymous reporting.

Should our suppliers have any questions or concerns, or if any compliance issues arise, or in the event that you become aware of misconduct related to the business of any DHC Entity undertaken by any DHC Personnel, any of your employees, or any employees of your business partners, we expect you to promptly notify DHC, by contacting any one of the following resources:

- the individual with whom you are liaising at the applicable DHC Entity;
- the DHC Compliance Office at dhc.compliance@dehavilland.com; or
- on a confidential and/or anonymous basis, the DHC Reporting Hotline at <http://lvav.ethicspoint.com>, through our mobile intake site at <http://lvavmobile.ethicspoint.com> or by telephone at 1-884-938-1635 (telephone only available in North America).