

ETHICS AND BUSINESS CONDUCT POLICY

HeliOperations will conduct its business with honesty and integrity and we will comply with the laws and regulations of the UK and each foreign country in which we operate. Any real or apparent inconsistency between UK and foreign law must be referred to the CEO.

We are committed to the highest standards of ethical conduct in our dealings with our employees, customers and suppliers, and expect the same in return from them, whilst promoting a work environment that is positive, diverse and open.

HeliOperations recognises good ethics are good for business and regular meetings and feedback with employees and customers will ensure the Company is up to date with trends, guidance, employee needs, sustainability, corporate ethics and business compliance.

Ethics Awareness Training and Business Conduct Training

All employees will receive ethics awareness training and business conduct compliance training. Ethics awareness training discusses our business conduct standards and prepares employees to recognize and react to situations that may require ethical decision making.

Business conduct compliance training focuses on the ethical, contractual, and legal responsibilities that apply and the potential consequences of violations. Business conduct compliance training also helps prevent and detect criminal conduct and reinforces legal compliance.

Making Inquiries and Reporting Violations

If you have good reason to believe that a violation of laws, regulations, policies or procedures has occurred, or you are asked to violate the same, you are responsible for reporting the violation or suspected violation, or any instances of significant employee misconduct, directly to your manager. Depending on the circumstances, failure to report a violation or a suspected violation may itself violate the policy.

Violations of laws, regulations, policies, procedures, or the Code may result in disciplinary action, up to and including termination of employment.

