

# Disclosure of Unethical Conduct Policy

## 1. OVERVIEW

Signature Aviation US Holdco LP and its subsidiary companies (collectively “Signature” or “the Company”) are committed to preserving a stable and secure working environment for all team members. Signature takes any form of unethical business conduct very seriously. Signature expects all team members to operate within the law and apply the highest standard of business ethics at all times.

This Policy sets forth the **Disclosure Procedures** for anyone working in or for a Signature company who suspects that any unethical business practice is occurring (or is likely to occur), by any Signature officer, director or team member or by any supplier, agent, distributor or other person providing services to or acting on behalf of Signature, to raise the matter with the appropriate person without fear of recrimination. These Procedures apply to any person who works with or for any Signature company, including contractors and team members supplied through employment agencies.

## 2. REPORTABLE FORMS OF MISCONDUCT

You must report any of the following forms of misconduct when you reasonably believe that the misconduct has occurred or is likely to occur:

- A criminal offence;
- The breach of a legal or regulatory obligation;
- A miscarriage of justice;
- A danger to the health or safety of any individuals;
- Damage to the environment;
- Actions inconsistent with Signature’s policies or procedures; or
- Deliberate concealment of information relating to any of the above.

You will not be expected to produce unquestionable evidence to support your concern. All that is required is that you have a genuine concern in relation to the matters highlighted above and that you raise it in good faith.

***This Procedure is not intended to address personal complaints, matters covered by an existing grievance procedure, or issues that would normally be addressed under existing Signature Health Safety & Environments (HS&E) review or other reporting procedures.*** Rather, this Procedure relates to the disclosure of serious offensive or harmful conduct that, in the best interests of Signature and its workforce, should be disclosed and addressed on an expedited basis. It shall be a violation of this Policy for anyone in a position of authority to discourage such disclosure

## 3. DISCLOSURE PROCEDURE

It is hoped that you will feel able to raise any concerns over a legal or business conduct issue with the Manager to whom you report. If you feel you are not able to approach your Manager or

that he or she has not dealt with your concern properly, you should approach your Human Resources contact or the Signature Legal Department to disclose your concerns.

You may also report your concerns anonymously via the Ethics Hotline by calling the toll-free phone number posted at your location, or by filing a report online at <https://signatureaviation.alertline.com>. The call centers are operated by an external third party 24 hours a day, 7 days a week, with representatives available to take your report in whatever language you are most comfortable.

In the event you disclose your identity, your contact details will be released only to those with a direct need to know.

Reports of suspected or actual misconduct will be investigated according to the **Policy on Internal Investigations and Disclosures**.

Signature's Legal Department will determine whether it is necessary to inform any person or organization outside of Signature, such as a government or law enforcement agency. If you feel the matter should be drawn to the attention of an outside body, you should mention this to us as part of your disclosure.

Timely feedback will be provided where appropriate, to the disclosing team member and the individual or individuals suspected of being involved, including proposed action and what further steps that may be taken, subject to obligations of confidentiality.

#### **4. NON-RETALIATION**

Team members will suffer no detriment of any kind for coming forward in good faith, and any disclosure will be dealt with in the utmost confidence by Signature. You are protected from any adverse action by Signature or its management in making disclosures under this Disclosure Procedure when you make the disclosure in good faith, and you reasonably believe that the information, including any allegation, is true.

Signature will not tolerate retaliatory conduct. Allegations of retaliation will be investigated and anyone responsible for retaliating against individuals who have reported suspected misconduct or risks to Signature's business will be disciplined, up to and including summary dismissal.

This Disclosure Procedure is intended to provide all team members with a secure, confidential and expeditious means of addressing real concerns within our business, and should only be employed in that spirit.

***Any disclosure presented under this Procedure made in bad faith, motivated by malicious intent or otherwise known to be untrue by the disclosing team member, will be dealt with appropriately by the applicable Signature Human Resources management in conjunction with Signature's Legal Department, including possible disciplinary action, up to and including summary dismissal.***

#### **5. COMPLIANCE**

Adherence to this Policy is mandatory for all team members. Please contact the Signature Legal Department with any questions.

If you feel that you or someone else may have violated this Policy, you should report the incident immediately to your supervisor. If you are not comfortable bringing the matter up with your immediate supervisor, or do not believe your supervisor has dealt/will deal with the matter properly, please notify HR, IT, or the Signature Legal Department as soon as possible. You may also contact the Ethics Hotline anonymously at 1-888-708-0803 (from the US or Canada), or online at <https://signatureaviation.alertline.com>.

## 6. POLICY

This Policy is under the jurisdiction of the Signature Legal Department and will be periodically reviewed by the General Counsel. Final decisions related to this Policy will be made by the General Counsel.

<b>Corporate Policy</b>	<b>Title:</b> Disclosure of Unethical Conduct Policy		
	<b>Function:</b> Legal		
	<b>Reviewed:</b> January 2023	<b>Supersedes:</b> June 2021, March 2021, June 2017	<b>First Implemented:</b> 2004
	<b>Owner:</b> General Counsel	<b>Approver:</b> Board	Page <b>3</b> of <b>3</b>