



## CODE OF ETHICS AND BUSINESS CONDUCT

### Handbook

Daniel DiMase  
[integrity@aerocyonics.com](mailto:integrity@aerocyonics.com)

## Message from the Aerocyonics President & CEO to our Colleagues



Dear Colleagues:

Conducting business the right way means performing our job with integrity, both in our employment practices and our regular business dealings. Put simply, we have an ethical and social responsibility to act and make decisions in the best interests of our colleagues, the marketplace which we serve, and the community in which we live. As President and CEO, I am committed to conducting our business in compliance with all local laws and regulations in the markets we serve with honesty, integrity, and respect for others in the workplace. This commitment extends to every Aerocyonics officer, director, employee, contractor, and agent of the organization.

The Code of Ethics and Business Conduct establishes a common set of ethical standards and legal principles that are expected when dealing with our colleagues, customers, suppliers, and communities. The Code of Ethics and Business Conduct was developed to help apply legal and ethical practices in all of your business dealings at Aerocyonics. Following the Code of Ethics and Business Conduct will enable our company and employees alike to grow and succeed by building trust with our colleagues, customers, suppliers, markets we serve, and community in which we live.

Honesty, integrity, and ethics are a vital part of Aerocyonics' core principles as a company. Our Code of Ethics and Business Conduct demonstrates our commitment to ensure we carry out our mission with integrity, honesty, and respect. Our principles are contained in the Code of Ethics and Business Conduct, which consists of the policies relating to the ethical and legal standards of conduct that need to be followed by all doing business on-behalf of Aerocyonics.

The Code of Ethics and Business Conduct applies to everyone at Aerocyonics regardless of your position and level of responsibility. Since no handbook can cover every situation, and since there may be instances where you have a question regarding a specific legal or ethical issue, contact your manager, supervisor, an Aerocyonics' member of the Leadership Team for assistance or send an email with your concerns to [integrity@aerocyonics.com](mailto:integrity@aerocyonics.com).

We are committed to delivering quality products and services in compliance with the law in the markets we serve with honesty and integrity. We cultivate a culture of meeting all laws and regulations and business dealings held to the highest standard of ethical and social responsibility.

Sincerely,

A handwritten signature in black ink that reads "Daniel J. DiMase". The signature is written in a cursive style and is positioned above the printed name.

Daniel J. DiMase  
President & CEO

## Contents

Message from the Aerocyonics President & CEO to our Colleagues .....	1
Aerocyonics Values .....	4
Our Commitment .....	4
Guiding Principles .....	4
Responsibility for our Code of Ethics and Business Conduct (COEBC) .....	4
Respect in the Workplace .....	4
Diversity and Inclusion .....	4
Human Rights .....	5
Anti-Discrimination .....	5
Anti-Harassment .....	6
Health and Safety .....	7
Substance Abuse .....	7
Anti-Violence .....	7
Your Personal Responsibilities .....	8
Lead by Example .....	8
Seek Guidance and Report Violations .....	8
Integrity in the Markets We Serve .....	11
Product Quality .....	11
Responsible Marketing .....	12
Our Customers .....	12
Our Suppliers .....	12
Our Competitors .....	13
Ethics in Our Business Activities .....	14
Conflicts of Interest .....	14
Anti-Corruption .....	16
Anti-Bribery .....	17
Anti-Money Laundering .....	18
International Trade Controls .....	20
Political Activities .....	21
Business Gifts .....	21
Responsibility to Our Shareholders, Coworkers, and Colleagues .....	23
Accurate Business Records .....	23

Government and Public Disclosures .....	24
Records Information Management.....	24
Audits and Investigations.....	24
Company Resources and Asset Protection .....	25
Fraud .....	26
Confidential and Proprietary Information .....	27
Privacy .....	28
External Communications .....	29
Intellectual Property .....	29
Email, Internet, and Information Systems .....	30
Administering Our COEBC.....	31
Investigating Misconduct.....	31
Disciplinary Actions .....	31
Our COEBC is Not a Contract .....	31
Amendments to our COEBC.....	31
Acknowledgement .....	32
Disclosure of Waivers.....	32

## Aerocyonics Values

### Our Commitment

Deliver sustained growth through empowered people acting responsibly. Build trust with honesty, integrity, and respect.

### Guiding Principles

Care for our customers, markets we serve, and community we live in.

Only sell quality products and services which are safe and reliable.

Ask honest questions and speak with truth and candor.

Win with diversity and inclusion with perspectives of our employees, customers, suppliers, collaborating partners, and the markets we serve to make a meaningful difference.

Balance short-term and long-term growth.

Respect our colleagues and succeed together.

## Responsibility for our Code of Ethics and Business Conduct (COEBC)

Our COEBC applies to every employee, officer, director, contractor, and agent of the organization, regardless of your position and level of responsibility. It governs every business decision we make. The ultimate responsibility of following the COEBC and for maintaining the culture of ethical excellence falls on each of us individually.

### Respect in the Workplace

One of the guiding principles of Aerocyonics' values is to respect others and succeed together. Acting with respect is fundamental to our strength as an organization and contributes to our success. We treat our customers, suppliers, communities, and colleagues with dignity, fairness, and courtesy.

Success is achieved through another one of our guiding principles - win with diversity and inclusion with perspectives of our employees, customers, suppliers, collaborating partners, and the markets we serve to make a meaningful difference. We foster a culture of creativity, growth, diversity of thought, and innovation. We value the diverse perspectives of all our colleagues. That includes our employees, customers, suppliers, and the markets we serve in order to make a meaningful difference.

### Diversity and Inclusion

Diversity includes all the unique characteristics that make each of us. Our personalities, lifestyles, work experience, ethnicity, race, religion, gender, gender identity, sexual orientation, marital status, age, national origin, disability, veteran status, or other differences define who we are. We strive to attract, develop, and retain a workforce that is as diverse as the markets we serve, and to ensure an inclusive work environment that embraces the strength of our differences to succeed in what we do. Diversity and inclusion promote a creative culture and enable learning, innovation and growth.

Each of us plays an important role in creating a work environment in which employees and business partners feel valued and respected for their contributions. You promote diversity and inclusion when you:

- Respect the diversity of each other's talents, abilities, experience, and thoughts
- Value the input of others
- Foster an atmosphere of trust through truth and candor

Our business will grow and succeed through understanding the needs of our consumers and fostering creativity and innovation if each of us embraces diversity and inclusion in all aspects of our business interactions.

### Human Rights

Aerocyonics recognizes the importance of maintaining and promoting fundamental human rights in our operations and supply chain. We are committed to respecting the rights of workers throughout the value chain. We operate under programs and policies that:

- Promote a workplace free of discrimination and harassment
- Prohibit child labor, forced labor and human trafficking
- Provide fair and equitable wages, benefits, and other conditions of employment in accordance with local laws
- Provide humane and safe working conditions

We expect our suppliers and business partners to uphold these principles as well to minimize the risk of human rights abuses throughout the supply chain.

Always ensure your actions do not violate or contradict any of the basic human rights principles noted above. If you suspect human rights abuse within our operations or supply chain, say something and report it.

### Anti-Discrimination

All of us should have the opportunity to reach our full potential and contribute to Aerocyonics' success and make a difference in the markets we serve. To accomplish this, never discriminate or treat employees or job applicants unfairly in business that involves recruiting, hiring, training, promoting, compensation, or any other term or condition of employment.

Your employment decisions regarding employees and applicants must always be based on merit, qualifications, and job-related performance, without regard to non-job-related characteristics such as:

- Race, color, ethnicity, or national origin
- Gender or gender identity
- Sexual orientation
- Age
- Religion
- Disability
- Veteran status
- Marital status

- Political belief or activity
- Any other legally protected status

Making employment decisions based on any of these personal characteristics is always against our policies and is illegal under the laws of many countries. You must always act fairly and give qualified individuals the chance to develop their abilities to reach their full potential and advance within our company.

### Anti-Harassment

**Harassment is not tolerated in our workplace.**

Aerocyonics seeks to provide a work environment that is free from harassment of any kind and/or any other offensive or disrespectful conduct. Our company complies with all laws prohibiting harassment, and our COEBC prohibits harassment in the workplace.

Harassment includes unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment. While the legal definition of harassment may vary by jurisdiction, we consider the following non-exhaustive list to be unacceptable behavior:

- Sexual harassment
- Offensive language or jokes
- Racial, ethnic, gender or religious slurs
- Degrading comments
- Intimidating or threatening behavior
- Showing hostility toward others because of individual characteristics

Never act in a harassing manner or otherwise cause your colleagues to feel uncomfortable in their work environment. It is important to remember that harassment, sexual or otherwise, is determined by your actions and how they impact others, regardless of your intentions.

If you or someone else is the subject of discrimination or harassment, say something and report it.

### Questions & Answers:

#### **What is Sexual Harassment?**

Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. It may consist of verbal, visual or physical conduct of a sexual nature that is unwelcome or makes someone feel uncomfortable. It can take many forms, such as:

- Sexual advances, request for sexual favors or unwelcome demands for dates
- Sexually oriented jokes, pictures, text or email messages
- Explicit or degrading comments about appearance
- Display of sexually suggestive pictures or pornography



## Health and Safety

No matter where you work or what you do for the company, you are expected to put your health and safety first.

We are committed to safeguarding the health and safety of our employees, visitors, contractors, consumers and the community in the markets we serve. Our health and safety rules, policies and procedures are designed to help you work safely and protect our colleagues, whether you are at our facilities, telecommuting, or out in the field in the marketplace.

You should always say something and raise a concern if you:

- Are asked to do a task you consider unsafe
- Are asked to do a job you think you are not properly trained to perform and that may harm you or others
- See someone performing a task that you think is unsafe or that the person is not properly trained to do
- Suspect that a vehicle or piece of equipment is not operating properly and may be unsafe
- Observe or are made aware of an unsafe condition or a potential danger to yourself or others

Safety is everyone's responsibility – you must insist that work be performed safely, no matter what your job is.

## Substance Abuse

We have a vital interest in maintaining safe, healthful, and efficient working conditions. If you work under the influence of drugs or alcohol, you could pose an unacceptable safety risk to you and others. You are expected to perform your job duties free from the influence of any substance that could impair your job performance. We therefore strictly prohibit:

- Working under the influence of alcohol or illegal drugs
- Possessing, selling, using, transferring or distributing illegal drugs or controlled substances while working on the premises
- Working while impaired by a lawful prescription medication or over-the counter drug

If you have a drug or alcohol problem, you are encouraged to seek professional assistance.

We recognize that there may be opportunities where alcohol may be consumed at a work-related event. Please remember that you are representing yourself and Aerocyonics to our colleagues and must maintain a level of professionalism at all times.

## Anti-Violence

Aerocyonics' standards of conduct include a zero-tolerance policy for workplace violence. You are prohibited from engaging in criminal conduct or acts of violence, intimidation, coercion, or acts that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats or any expressions of hostility, intimidation, aggression or hazing.

Our company also prohibits the possession of weapons in the workplace. To the full extent permitted by local law, this prohibition extends to the company parking lots as well as our facilities. Our zero-



tolerance policy applies to behavior on company premises, as well as to the behavior of our employees engaged in Aerocyonics business anywhere in the world outside of our premises.

*Don't delay* – if you see something, say something and report threats or potential violence immediately.

### Your Personal Responsibilities

Your work must comply with the COEBC, policies and procedures of the organization, and applicable laws and regulations in the markets we serve. It is your responsibility to know and comply with the COEBC, policies and procedures that apply to the work you perform, and use them to guide the decisions you make.

Aerocyonics is committed to complying with all applicable laws and regulations in the markets we serve. Laws and regulations can be complex, and following our COEBC and established policies, procedures, and work instructions will help ensure your compliance and enable delivery of quality products and services which are safe and reliable.

### Lead by Example

Each of us must act with honesty, integrity and respect, especially leaders, supervisors and managers of the organization. While each employee is expected to follow the COEBC, it is especially important for leaders, supervisors and managers to lead by example and to mentor others to embrace our COEBC by:

- Encouraging ethical decision making
- Respecting team members input
- Asking honest questions
- Enabling individuals to feel comfortable raising concerns
- Preventing retaliation against those who speak up
- Helping in resolving issues raised
- Escalating issues when needed
- Rewarding integrity, honesty, and respect

We expect our leaders, supervisors and managers to reinforce the principles of our COEBC throughout all levels of our workforce.

### Seek Guidance and Report Violations

**It is your responsibility to ask honest questions and raise concerns when potential compliance issues arise.**

The COEBC cannot describe every possible situation that you may encounter in your daily work. If you cannot find answers in the COEBC, or if you have questions on how to interpret it, seek guidance. In addition, if you are aware of something that may be a violation of our core values, our COEBC, our policies, or applicable laws and regulations, you must speak up and report the issue so it can be addressed.

You have several channels to seek guidance or to report a violation:

- *Your immediate manager, next level manager, or supervisor:* Your managers and supervisors are excellent resources for providing guidance or concerns related to many ongoing job-specific

policies and processes, work responsibilities, co-worker issues, disciplinary disputes, promotion activities, and issues related to the work environment.

- *An Aerocyonics' member of the Leadership Team:* Aerocyonics fosters an open, cooperative, and dynamic environment in which employees and Aerocyonics alike can thrive. Aerocyonics provides an open-door policy in which employees are encouraged to take problems and solutions to the next level.
- *Compliance and Ethics Issues:* If you are aware of an issue involving an actual or potential COEBC, legal or regulatory violation, you should report the incident to a member of the Aerocyonics Leadership Team to address and resolve. Some examples of issues which should be reported include:
  - Accounting or auditing irregularities or misrepresentations
  - Fraud, theft, bribery and other corrupt business practices
  - Human rights violations
  - Discrimination or harassment
  - Actual or potential conflicts of interest
  - Guidance on any national, regional, tribal, state or municipal legal or regulatory requirements that applies to our company and/or to your job
- In addition to the resources listed above, we have set up an email where you can raise your compliance concerns, ask questions, or report suspected compliance violations by emailing to [integrity@aerocyonics.com](mailto:integrity@aerocyonics.com).

## Questions & Answers:

### **What should I do if my manager or supervisor asks me to perform a task that I believe might violate our COEBC, law or regulation?**

Raise your concerns openly and honestly with your manager or supervisor. If you are not satisfied with the response, or otherwise feel uncomfortable speaking with your manager or supervisor, raise the concern through the resources listed in under “Seek Guidance and Report Violations”. You should never knowingly violate the COEBC, a policy, the law, or regulations because a manager directs you to do so or because you failed to ask for guidance.

### **How do I know when I should seek guidance?**

If something does not feel right to you and you believe it is wrong, then it may not be the right thing to do. Ask yourself:

- Do I think this course of action is legal? Is it consistent with our values, COEBC, and policies?
- Could it be considered unethical or dishonest?
- Could the action hurt Aerocyonics’ reputation? Could it put our company at risk? Could it cause our company to lose credibility?
- Will the action hurt other people? Employees? Customers? Consumers? Investors?
- Will it reflect poorly on me as an individual or Aerocyonics? How would the headline look on the front page of the newspaper?

If you are unsure of the answers to any of these questions, you should seek guidance in making the right decision.

### *See Something, Say Something*

Our integrity email, [integrity@aerocyonics.com](mailto:integrity@aerocyonics.com) is available to all Aerocyonics employees, suppliers, consumers, contractors, subcontractors, and agents to report suspected violations of our COEBC.

To assist Aerocyonics in investigating your report, you are encouraged to communicate all of the information you are comfortable providing. The information will be kept confidential, except as needed to conduct a full and fair investigation. You may remain anonymous, except when disclosure is required by local law. Your identity and personal identifiable information will not be recorded in any report from an investigation, unless you voluntarily provide permission for such information. The important thing is not who is reporting, but what is being reported that matters.

### *Non-Retaliation*

Aerocyonics is committed to protecting the rights of individuals who report issues in good faith either through one of the reporting means described in our COEBC or to government authorities. Our company will not retaliate or permit retaliations against a person who is acting responsibly and in good faith:

- Reports what they believe is a violation of our values, our COEBC, our policies, the law or regulations



- Raises a compliance question or seeks advice about a particular business practice, decision, or action.
- Cooperates in an investigation of a potential violation.

Retaliation against an employee for reporting an issue in good faith is itself a violation of our COEBC. If you know or suspect that retaliation has occurred or is occurring, you should report it.

#### Questions & Answers:



#### **What happens when I report something through the [integrity@aerocyonics.com](mailto:integrity@aerocyonics.com) email?**

Information is sent directly to the President & CEO of Aerocyonics and reviewed with independent external legal counsel with expertise in handling compliance and ethics violations. Appropriate professionals will investigate concerns, and, if warranted, remedial actions will be taken.

## Integrity in the Markets We Serve

### *Our Commitment*

We treat all our colleagues in the markets we serve with fairness and integrity. This includes our consumers who purchase our products, distributors and resellers who sell our products, the communities we serve, as well as our competitors and suppliers. Underlying this commitment to integrity is our obligation to comply with all applicable laws and regulations wherever we do business.

### Product Quality

**We are committed to producing high quality products across all our brands.**

We maintain trust by manufacturing superior products, starting with the purchase of raw material and components, and continuing through to when the product gets to the consumer. Our guiding principle is to only sell quality products and services which are safe and reliable.

If you are involved in any aspect of developing, handling, packaging or storing our products or service offerings, you are expected to:

- Know the quality standards, policies, and procedures that apply to the products and services produced
- Follow good manufacturing practices and testing protocols
- Comply with all applicable laws and regulations

It is important to always be alert for situations that could compromise our products and services. Quality is everyone's job. If you see something that could negatively affect the quality of an Aerocyonics product or service, say something and report the issue immediately.

### Responsible Marketing

**If you are involved in marketing, always market our product responsibly with truth and integrity.**

Our product marketing must reflect our company's high ethical standards, be truthful, understandable to the consumer, and in compliance with all applicable laws and regulations. If you are involved in marketing, you should never:

- Overstate or misrepresent the qualities of our products or packaging
- Use misleading or untruthful statements in our advertising, labels, or packaging
- Make claims about our products or services without adequate substantiation and proper management clearance and legal guidance

You must ensure our marketing programs conform to applicable laws and regulations as well as to applicable policies of your function, including guidelines relating to marketing to children.

### Our Customers

**We treat our customers fairly.**

Integrity in the markets we serve requires each of us to treat our customers ethically, fairly, and in compliance with all applicable laws and regulations. When dealing with our customers, always:

- Earn their business on the basis of our superior products and services, competitive prices, and courteous customer service
- Present our products and services in an honest and forthright manner
- Avoid unfair or deceptive trade practices
- Communicate our sales programs clearly
- Deliver on your promises

Never sign any side letter or any other document that modifies or interprets an existing customer agreement or contract that relates to customer payments, interpretation or modification of a contract, or that waives customer performance without the prior review and approval of management with legal guidance.

Our contracts with customers must always reflect the importance and value we have with their business. All customer sales and trade spending agreements should be in writing and approved by management with legal guidance.

### Our Suppliers

**All interactions with suppliers must meet our high ethical standards.**

We hold our suppliers to the same standards of integrity to which we hold ourselves. An unethical or illegal act of a supplier may hurt Aerocyonics' reputation as a company and cause a loss of goodwill in the communities we serve. Therefore, all suppliers must comply with our Human Rights Policy, Conflicts of Interest Policy, Anti-Corruption Policy, Anti-Bribery Policy, and Anti-Money Laundering Policy in

Aerocyonics business dealings as a condition of doing business with us. Our suppliers include any third-party vendor, consultant, contractor, service provider or supplier of raw material, assemblies or services.

If you are responsible for selecting a supplier, you should base your decision on merit, quality of service, competitive pricing, and reputation.

When selecting and retaining suppliers, you should:

- Follow our applicable bidding, negotiating, and contracting processes
- Perform appropriate due diligence to determine that the supplier is a legitimate enterprise, with a reputation for integrity and ethical behavior, that does not engage in unlawful activities
- Avoid potential or actual conflicts of interest with suppliers

## Our Competitors

**Always compete with integrity and follow applicable antitrust and competition laws.**

Aerocyonics is committed to outperforming our competitors legally and ethically. Therefore:

- Never comment on competitors' products or services in an inaccurate or untruthful manner
- Only use legitimate means for obtaining competitive information
- Respect the confidential and proprietary information and intellectual property rights of our competitors and other third parties
- Always comply with antitrust and competition laws

When dealing with competitors, you should never enter into any agreement, whether formal or informal, written or verbal, to set prices or other terms of sale, coordinate bids, allocate customers, sales territories, or product lines, or engage in any other activity that violates applicable antitrust or competition laws. Never discuss such topics with a competitor, even in an informal setting such as a trade show or customer event.

It is also important to avoid activities that may appear to violate antitrust or competition laws. As an example, all written communications referring to our competitors should be business appropriate in tone and in a manner that refrains from language that could be construed as encouraging anti-competitive behavior.

Violations of antitrust or competition laws may result in severe legal penalties for our company and criminal charges for the individuals involved. Competition laws are complex and vary by country. Contact management to seek legal guidance. If you suspect an antitrust violation, say something and report it.

Agreements made between joint venture members about their operations of the joint venture are considered to be partner rather than competitor agreements, even if the partners are competitors outside of the joint venture. However, anti-competitive agreements between competing joint venture partners outside of the scope of the joint venture are prohibited. The exchange of competitively sensitive information between Aerocyonics, its joint ventures, or joint venture partners could be problematic. Therefore, prior to the exchange of information, seek guidance from the Aerocyonics Leadership Team or through the [integrity@aerocyonics.com](mailto:integrity@aerocyonics.com) email.



### Questions & Answers:

#### **How do I legitimately obtain competitive intelligence?**

Competitive intelligence can be obtained fairly and ethically from numerous publicly available sources, such as media reports, websites, trade journals, annual reports, government filings, speeches from company executives, and from customers in the context of meeting competitive offerings. Competitive intelligence should never be obtained from misrepresentation, trespassing, theft, invasion of privacy or obtaining information from co-workers about previous employers.

## Ethics in Our Business Activities

### *Our Commitment*

Our COEBC requires each of us to make ethical business decisions and to avoid conflicts of interest in all of our business dealings. Permitting corruption in our business activities is not tolerated and is completely inconsistent with Aerocyonics' focus on doing business the right way. Our commitment to integrity extends to all of our business relationships and to all interactions with government officials.

### Conflicts of Interest

**Avoid a conflict, or an appearance of a conflict, between your personal interests and those of the company.**

It is impossible to give an exhaustive list of situations that might present a conflict. However, among the most common situations that may constitute a conflict are:

- Holding an interest in or accepting free or discounted goods from any company or organization that does, or is seeking to do, business with Aerocyonics, by any employee who is in a position to directly or indirectly influence either the company's decision to do business, or the terms upon which business would be done with such company or organization.
- Holding an interest in an organization that competes with the company.
- Being employed by (including working as a consultant) or serving on the board of any organization that does, or is seeking to do, business with Aerocyonics or which competes with the company.
- Gaining personally, e.g., through commissions, loans, expense or travel reimbursements or other compensation, from any company or organization doing, or seeking to do, business with Aerocyonics.
- Spouse being employed or accepting employment with a competitor firm of Aerocyonics.

Our company's conflicts of interest policy is straightforward – every Aerocyonics officer, director, employee, contractor, and agent of the organization has an obligation to act in the best interest of our company at all times and to avoid any actual or potential conflict that may exist between the employee

(and employee's immediate family) and Aerocyonics. If you are aware of an actual or potential conflict, say something and disclose it.

Conflicts of interest may arise when an Aerocyonics employee, their family member or friend:

- Engages in activities that compete with, or appear to compete with, our company's interests
- Lets your business decisions be influenced, or appear to be influenced, by personal or family or friendships interests
- Uses Aerocyonics' property, information, or resources for personal benefit or the benefit of others
- Hires, supervise or has a direct or indirect line of reporting to a family member or someone with whom you have a romantic relationship
- Has outside employment that negatively affects your job performance or interferes with your Aerocyonics responsibilities
- Works for, provides services to, has a financial interest in or receives any personal benefit from a supplier, customer, competitor or a company that does or seeks to do business with Aerocyonics if such relationship or interest could influence, or appear to influence, your business decisions. In general, it will not pose a conflict of interest if you or a family member have a nominal stock ownership interest (generally, less than a 1% equity interest) in a supplier, customer or competitor, unless that equity interest constitutes more than a small portion of your overall investment portfolio and thus creates the potential for the appearance of a conflict of interest.

If at any time you think that you may have a potential or actual conflict of interest, you have an obligation to disclose the conflict promptly with our company so that a determination can be made to the existence and seriousness of an actual conflict. Many times, conflicts can be resolved through open and honest discussion. Certain material conflicts may require the acknowledgement of your confidentiality obligations, reassignment of roles, or recusal from certain business decisions.

**You must disclose potential conflicts of interest to our company. Remember, having a conflict of interest is not necessarily a COEBC violation, but failing to disclose it is.**

#### Questions & Answers:

##### **Who is considered to be a "family member" under the COEBC?**

A family member can be any of the following: spouse, domestic partner, parent, sibling, child, grandparent, grandchild, niece or nephew, aunt or uncle, cousin, stepchild, stepparent or in-law. It can also be anyone living in your household, or anyone you are dependent upon or anyone dependent upon you or one of your relatives. Remember, potential conflicts of interest are not limited to just relationships with relatives or family members. Conflict of interest may arise with anyone whom you have a friendship or personal relationship.





## Anti-Corruption

### **Business decisions influenced by corruption are strictly prohibited.**

Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. “Corruption” generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means. Corruption may involve payments or the exchange of anything of value and includes the following activities:

- Bribery (bribery of a government official or commercial bribery)
- Extortion
- Kickbacks

Corrupt activities are not only a violation of the COEBC, they can also be a serious violation of criminal and civil anti-bribery and anticorruption laws in various countries. Any offer of a payment or anything of value to influence a business decision or government action could be considered a bribe or kickback. You must never directly or indirectly offer, request, accept, or indicate a willingness to accept a bribe. Use caution, as even some non-cash gifts and benefits could be perceived as bribes.

There are specific rules and regulations for doing business with governments. Each of us must take responsibility for understanding how these rules apply to our jobs. In many countries, Aerocyonics and Aerocyonics employees must not provide meals, entertainment, gifts, or anything else of value to government officials and employees. You cannot discuss employment opportunities with government officials and employees outside of normal hiring practices. In all countries, you must not make any attempt to influence any government official or employee with regard to the award of a government contract other than through the standard procurement channels for specific solicitations.

We must only give or accept business courtesies that are for business purposes, are modest and infrequent, and are not prohibited by the law or policies that apply to all parties involved. Never provide gifts, entertainment, or transportation to government officials or customers that could violate laws, regulations, or customer policies.

Should you become aware of any potential or actual corrupt activities, say something and report it.

### Questions & Answers:

#### **What is “Anything of Value”?**

Corruption may involve the exchange of “anything of value”, which is very broad and could include goods, services or merchandise, such as cash, cash equivalents, gift cards, vouchers, hospitality, meals, event tickets, retail certificates, entertainment, travel perks, use of vacation homes, airfare or accommodations, special favors or privileges, such as educational or employment opportunities for friends or relatives, stock options, donations to designated charities, discounts, personal services, loans, co-signing of a loan or mortgage, excessive consulting fees or commissions, or a promise of future employment.



**If my U.S. Government customer asks me for a ride in my car, what should I do?**

Unless Aerocyonics is contractually required to provide transportation, you must politely say no. Most U.S. Government employees are aware of specific rules and regulations for conducting business with contractors and should not be offended. Should there be any further questions requiring clarification, direct your customer to your manager or the Aerocyonics contract administrator assigned to the contract which you are engaged.

**Anti-Bribery****You must comply with all applicable anti-bribery laws and regulations.**

No matter where you conduct business around the world, there is an anti-bribery law or regulation that applies to you. Most countries have anti-bribery laws that prohibit bribing a government official. Under some countries' laws, such as the United Kingdom's Bribery Act, bribing anyone (called "commercial bribery") is a crime. In addition, all Aerocyonics employees, regardless of personal location or place of business must comply with the U.S. Foreign Corrupt Practices Act (FCPA). The FCPA makes bribery of government officials a crime and applies anywhere Aerocyonics conducts business.

To comply with anti-bribery laws, no employees should ever offer, directly or indirectly, anything of value, including a gift or entertainment, to any government official or their representatives to:

- Obtain or retain business
- Influence business decisions
- Secure an unfair business advantage

These prohibitions apply to our business operations and to anyone acting on our behalf, including agents, consultants, suppliers, and contractors. For the purposes of our Anti-Bribery Policy and applicable anti-bribery laws and regulations, a government official is interpreted broadly to encompass a number of different categories and individuals. Please see the applicable questions and answers section for clarification with examples.

Not all government payments are problematic. For example, payments made to a government entity in the normal course of business, such as to pay taxes or when the government entity is a customer or supplier requiring payment for an invoice or return. However, payments of any kind for bribes or facilitating payments to government officials are prohibited and considered a violation of our Anti-Bribery Policy. If you receive a request from a government official for a bribe, you must decline the payment. If you are in a situation where you have a reasonably good faith belief that failure to make the payment may jeopardize your health or safety, you may make the payment. You must promptly report any demands for a bribe, or the actual payment of a bribe made under coercion, directly to the Aerocyonics Leadership Team or the [integrity@aerocyonics.com](mailto:integrity@aerocyonics.com) email.

Exchanging gifts and sharing entertainment in connection with a legitimate business purpose can foster constructive relationships with third parties. However, gifts and entertainment should never affect, or appear to affect, impartial decision-making by Aerocyonics employee or our colleagues. They should never be offered or received in exchange for preferential treatment.

Subject to a number of narrowly tailored exceptions to the Anti-Bribery Policy, all payments and gifts to, and entertainment of, government officials must be pre-approved in writing by the Aerocyonics

Leadership Team in collaboration with our legal counsel. All payments, both direct and indirect, made to government officials must be accurately recorded in our books and records.

If you are unsure whether you might be dealing with a government official, or have any other questions on complying with anti-bribery laws, you should contact the Aerocyonics Leadership Team or the [integrity@aerocyonics.com](mailto:integrity@aerocyonics.com) email.

If you are aware of any suspected bribery activity, say something and report it.

#### Questions and Answers:

#### **What are examples of a “government official” under our Anti-Bribery Policy?**

“Government officials” may include:

- All government employees, including employees of regulatory agencies or departments, such as environmental, licensing, tax and customs
- Any candidate for political office
- Any political party
- An official of a political party
- Representatives of public international organizations, such as the World Bank, International Red Cross or the World Health Organization
- Mayors or other local city officials
- Members of law enforcement, including the military, local police and other enforcement agencies
- Employees of state-owned enterprises, such as purchasing managers of government-run airlines, universities, school systems, hospitals, television stations, utilities (oil, gas, water, and electric companies), laboratories, defense contractors or other commercial enterprises that are owned, controlled or managed by a government
- Member of royal families
- Employees of public international charities such as UNICEF
- Spouses or immediate family members of any of the foregoing



#### **What is a “facilitating payment”?**

A facilitating payment is a payment made to a government official to expedite non-discretionary actions or services, such as providing police protection or mail service, processing visa, permit or licensing applications, or providing utilities such as phone service, water and electricity. These payments are prohibited at Aerocyonics.

#### Anti-Money Laundering

**If you suspect your customer or supplier is engaged in an illegal activity, report it.**

Aerocyonics complies with all laws and regulations that prohibit money laundering or financing for illegal or illegitimate purposes. "Money laundering" is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

You should always ensure that you are conducting business with reputable customers and suppliers, for legitimate business purposes, with legitimate funds. Check for "red flags" such as requests from a potential customer or supplier for cash payments or other unusual payment terms.

If you suspect money laundering activities, say something and report it.

#### Questions & Answers:

#### **What are some examples of "red-flags" that should be investigated and/or reported?**

"Red Flags" may include:

- Representatives or intermediaries acting in a suspicious manner
- Unnecessary representatives or intermediaries
- Requests for cash payments
- Payments in third countries other than where the services are performed or the service provider is based
- Payments to or benefits for an individual or company other than the service provider
- Excessive consulting fees or commissions
- Use of a local sales representative or other covered third party recommended by a government customer
- Requests for payments in advance or prior to an award of a contract or other business
- Requests for large contingency or "success" fees
- Request for reimbursement of extraordinary, poorly documented, and/or last-minute expenses
- Requests for payments to a numbered account
- Use of a shell or holding company that obscures ownership without a credible explanation



## International Trade Controls

**If you are involved in the import or export of goods that may include information, you must comply with trade regulations.**

Our business transactions are subject to various sanctions or trade controls, laws, and regulations, including:

- Government-imposed export controls, trade restrictions, trade embargoes, legal economic sanctions and boycotts
- Anti-boycott laws that prohibit companies from participating in or cooperating with an international boycott that is not approved or sanctioned by the U.S. Government.
- Sanctions by different governments around the world that restrict activities with certain countries, entities, or individuals

Export & Trade compliance laws and regulations cover the export and re-export of products, services, software, technology, technical data, as well as sanctions and anti-boycott requirements. Exports include physical exports and include oral, visual, or electronic exports of data, software and technology. U.S. export control laws also include technical data transfers to foreign nationals within the United States, disclosures of U.S. technical data in a foreign country to persons of third country nationality, re-exports of U.S. origin items from one foreign country to another, and exports of foreign-made items that incorporate more than 10% U.S. content.

U.S. laws generally prohibit U.S. companies from participating in any boycott, unless the U.S. Government has approved the boycott. Anti-boycott laws also require us to report any requests to engage in boycotts to appropriate government authorities. Say something and report the activity if you receive any requests for information or any contract terms that:

- Requests information about any person's past, present, or perspective relationship with boycotted countries or blacklisted companies
- Requests information about any person's race, religion, gender, or nationality
- Requests discrimination against individuals or companies on the basis of race, religion, gender, or nationality

The U.S. government also imposes sanctions on a number of countries in which U.S. persons, U.S. companies, and their foreign subsidiaries may not do business. The Office of Foreign Assets Control (OFAC) of the United States Department of Treasury frequently modifies the list of countries and/or the degree of restrictions in place with respect to any such country. Employees engaged in international trade have a responsibility for consulting the most current list which can be found at <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>. It is Aerocyonics policy that our company will not in any form do business, undertake any work in, or conduct product or service sales in countries subject to OFAC embargoes or sanctions, except as permitted under U.S. law.

This prohibition also applies to undertaking work in or selling products to any entity that is located in any of these countries, or to any entity that is owned or controlled by the government of any of these countries regardless of where the entity is located. Other countries with which Aerocyonics conducts business may impose similar trade sanctions and restrictions with respect to one or more of the same countries, entities, and individuals. The U.S. and other governments maintain several lists of entities

with which their companies cannot do business. If you are involved in international trade, you should routinely check those lists.

It is your responsibility to maintain compliance with international trade controls. If you suspect an export compliance issue, ask honest questions, seek answers, and report any issues discovered.

## Political Activities

**You are prohibited from using company resources for personal political activities.**

Aerocyonics encourages its associates to participate in their communities, which may include political activities. However, you may not use company funds or resources, or receive company reimbursement, for personal political activities, including contributions to political candidates or parties.

The U.S. federal government, states, localities, and some other countries have enacted laws regulating political contributions, political activities, and gifts in order to prevent improper influencing of public officials. For example, persons who are not United States citizens are not permitted to make political contributions to candidates in federal, state or local elections in the United States. Other countries also have laws regulating political contributions. Employees are urged to be sure their personal political contributions and activities are in compliance with applicable laws. Avoid even the appearance of using company resources for political activities.

On occasion, Aerocyonics may communicate information and its corporate opinions on issues of public concern that affect our company. These announcements are not intended to pressure you to adopt certain ideas or support certain causes. Your decisions to contribute your own time or money to any political or community activity are entirely personal and voluntary.

Aerocyonics follows all laws and regulations in promoting our company's position relative to government authorities and in making political contributions. No contribution of company funds, property, services or gifts can be made in support of any political candidate for elective office or any political party or party official in the United States or in any other country by the company, or in the name of the company designee, without pre-approval of the Aerocyonics Leadership Team. Corporate political contributions are strictly regulated and must always be approved by the Aerocyonics Leadership Team in consultation with our legal counsel.

## Business Gifts

**Business gifts must be lawful, authorized and appropriate.**

The practice of giving or receiving a customer's or supplier's business gift requires careful consideration by you and your manager or supervisor. Before any gift is exchanged, you should determine if it is permitted under our COEBC that may include functional policies.

You are prohibited from providing, offering, or receiving any gift that serves to, or appears to, inappropriately influence business decisions or gain an unfair advantage. However, under certain circumstances you may exchange business gifts that are intended to generate goodwill, provided that:

- The gift is given in good faith, without expecting any return favor or improper benefit or business advantage, is of nominal value (generally under \$75 USD or its equivalent), is provided openly and transparently, is given on behalf of Aerocyonics and not on behalf of any individual,

is reasonable and customary, is given infrequently, and does not otherwise create the appearance of impropriety

- The gift is not cash or a cash equivalent and meets all other requirements of our policies, including our Anti-Bribery Policy
- Your division or function does not have a “no gifts” policy in effect
- The gift is permitted under the laws that apply to the recipient and the recipient of the gift is authorized and permitted to accept the gift

“Business gifts” do not include company-sponsored sales contests or incentive programs. In addition, business hospitality, including meals and entertainment, is not prohibited as long as the nature and frequency of the occasion is reasonable, the occasion involves the active conduct of company business and the business hospitality otherwise complies with our policies for pre-approval and expense reimbursement.

“Hosting” is another strictly regulated activity that is prohibited by Aerocyonics. It involves paying for travel, accommodation, or daily living expenses for a third party (such as a government official or an employee of a commercial entity) in conjunction with their visit to an Aerocyonics office, site, or other location for the purposes of promoting, demonstrating, or explaining the benefits of Aerocyonics’ products or services. We must always follow the applicable laws, regulations and rules concerning the hosting of government officials, employees of commercial entities, and our business partners.

Gifts and entertainment to government officials can be illegal. Even a simple gift or meal to a government official can be illegal. Subject to a number of narrowly tailored exemptions identified in the Anti-Bribery Policy, you must obtain prior written approval from the Aerocyonics Leadership Team in collaboration with our legal counsel prior to giving or offering any gift, meal or entertainment to a government official.



#### Questions and Answers:

##### **What departments or functions have a “no gifts” policy?**

Employees who work in our procurement function and IT employees in roles that either directly support procurement or influence vendor selection must follow the procurement functions “no gifts” policy which prohibits the exchange of gifts of any kind, regardless of value. Always check with your manager or supervisor to confirm whether or not your department, function or work group has a “no gifts” policy.

##### **What types of gifts are commonly considered as nominal in value?**

Gifts that are infrequent and under \$75 USD or equivalent in most countries are considered nominal. Examples include branded promotional items, such as a t-shirt or hat given as a goodwill gesture to introduce our brands.

## Responsibility to Our Shareholders, Coworkers, and Colleagues

### *Our Commitment*

Acting responsibly with transparency, honesty and candor goes hand-in-hand with protecting shareholder value, our coworkers and colleagues alike. Each employee creates value for our shareholders by putting our company's interests first, maintaining accurate business records, and protecting and properly using company resources, information, and property.

### Accurate Business Records

**Your business records must be accurate and complete.**

Aerocyonics' focus on speaking with honesty and candor highlights our commitment to accuracy in our company's books and records. Business records, including our financial statements, contracts and agreements, must always be accurate and reflect a straightforward presentation of the facts. No matter what type of document or how insignificant it might seem, the information contained in a business record must always be truthful and complete. Financial records must reflect all components of the financial transactions and events. Likewise, all of your business transactions, no matter what the dollar amount, must be properly authorized, executed and recorded.

In addition, anything provided to a government official must be properly and accurately recorded in Aerocyonics' business records in accordance with our Anti-Bribery Policy.

You are accountable for the accuracy of the business records that you handle in the normal course of business. Never:

- Falsify, omit, misstate, alter or conceal any information or otherwise misrepresent the facts on a company record
- Encourage or allow anyone else to compromise the accuracy and integrity of our records

If you notice an inaccuracy in a company record, or a failure to follow our internal control processes, promptly say something and report it.



### Questions and Answers:

#### **What are considered "business records"?**

"Business records" include any document, or communication in paper or electronic form that is maintained in the course of business. This covers a wide variety of information, including: presentations, spreadsheets, payroll documents, time cards, attendance records, legal agreements, information in filings with government agencies, inventory records, invoices, purchase orders, market research tests, lab tests, quality control tests, travel and expense reports, inspection records, transportation logs, hazardous material records, accident reports, and business plans.



## Government and Public Disclosures

### **Our financial reporting obligations rely on Aerocyonics' accurate business records.**

Our shareholders, investors, and employees alike rely on our company, and the law obligates us, to accurately report on our business, our earnings and our financial condition. The disclosures we make in our public communications, regulatory disclosures and reports submitted to financial institutions investing in Aerocyonics and to governmental agencies must always be full, fair, accurate, timely and understandable.

If you are involved in any aspect of preparing our financial statements, or the certifications on which they rely, you must always follow our financial policies, our system of internal controls and generally accepted accounting principles.

Accurate financial reporting means you should never:

- Understate or overstate known or estimated liabilities or assets
- Accelerate or defer costs in violation of generally accepted accounting principles
- Fail to properly maintain supporting documents for business transactions
- “Channel stuff”, “trade load” or otherwise inflate or deflate quarterly annual sales by pulling forward or delaying shipments or intentionally selling larger quantities than the customer needs

If you are involved in responding to any government or customer audit, answer questions honestly.

## Records Information Management

### **Always maintain business records in accordance with our Records Information Management Policies.**

Aerocyonics generates a large volume of records and documents each day. The business records that you work with must be maintained, retained and destroyed in accordance with all legal and regulatory recordkeeping requirements. To manage your business records properly:

- Comply with our records information management policies for all documents, files, electronic records and emails
- Follow the retention periods specified in the Records Retention Schedule for your division, country or function
- Follow the instructions in a “legal hold” record retention notification

Consult the Aerocyonics Leadership Team in consultation with our legal counsel if you have any specific questions concerning the documents referred to in a legal hold notification. Destruction of documents subject to a legal hold notice, even inadvertently, could expose our company and you to civil and criminal liability.

## Audits and Investigations

### **Our auditors and investigators require your full cooperation and your honesty.**

During your employment with Aerocyonics, you may be asked to participate in an audit or internal investigation conducted by our internal auditors, external auditors, or at the request of the Aerocyonics Leadership Team and our legal counsel. When this happens, you are always expected to cooperate fully and communicate honestly.

You may also receive a request for documents or a request to meet with regulators or lawyers in connection with a legal proceeding or government investigation. If you receive such a request, you should immediately contact the Aerocyonics Leadership Team in collaboration with our legal counsel for assistance.

Effectively working with investigators or regulators as they conduct audits and inspections is critical to maintain our reputation and adherence to our core values. If you receive a request for information from a government or a government agency:

- Immediately contact and consult the Aerocyonics Leadership Team in collaboration with our legal counsel
- Treat regulators professionally, courteously, and respectfully
- Ensure the information you provide is honest, accurate, and not misleading

Never ignore requests for information, subpoenas, or any other request from a government or a government agency.

### Company Resources and Asset Protection

**You have an obligation to protect Aerocyonics' resources.**

Aerocyonics relies on you to use company resources honestly and efficiently. Resources include physical property, such as facilities, supplies, equipment, machinery, spare parts, raw materials, finished products, vehicles and company funds. They also include intangible assets, such as company time, confidential information, intellectual property and information systems. You should use company resources for legitimate business purposes and protect them from theft, loss, damage, improper disposal, or misuse.

The obligations to protect company funds and resources is particularly important if you have spending authority, approve travel and entertainment expenses, or manage budgets and accounts. Improper use, carelessness, or theft of any company asset negatively impacts our business. In very limited situations and with approval of your supervisor or manager, occasional personal use may be allowed as long as it does not interfere with your work or responsibilities and does not create a financial loss.

You must always:

- Ensure funds are properly used for their established purpose
- Obtain required approval before incurring an expense
- Accurately record all expenditures
- Verify that expenses submitted for reimbursement are business-related, properly documented, and comply with our policies
- Use company assets efficiently, responsibly, and for their intended business purpose



### Questions and Answers:

#### **What are some examples of misappropriating company resources?**

Taking product or supplies for personal use, charging personal expenses to the company, reselling scrap or waste product for your financial gain, or diverting assets through fraud or embezzlement are all examples of misappropriating company resources.

### Fraud

#### **Aerocyonics prohibits all Fraud.**

If you intentionally conceal, alter, falsify or omit information for your benefit or the benefit of others, you could be committing fraud and misusing company resources. Fraud may be motivated by the opportunity to gain something of value (such as meeting a performance goal or obtaining a payment) or to avoid negative consequences (such as discipline).



Examples of fraud include:

- Altering data to meet productivity goals
- Presenting false medical information to obtain disability benefits
- Falsely reporting time worked to earn more pay or to avoid discipline for being late or absent from work
- Misrepresenting sales or other information to meet performance goals
- Misstating financial information in our company's books and records
- Embezzlement
- Falsification of company records for personal gain or other reasons

The above list is not all-inclusive, but is intended to be representative of situations involving fraud. Employees are obligated to protect the company's assets and ensure their efficient use. The theft, carelessness and waste of company resources and assets are prohibited and could have a direct negative impact on the company's reputation and profitability.

Also avoid the appearance of fraud. For example, never spend company funds without prior approval. Similarly, never enter into an agreement on behalf of our company unless you are authorized to do so.

## Confidential and Proprietary Information

**You must protect the confidential and proprietary information of our company and our business partners.**

During your employment, you may acquire information about our company, our customers, suppliers, or joint venture partners that is sensitive, confidential or proprietary. If you use or come in contact with confidential or proprietary business information, whether the information is from Aerocyonics or another organization, you must use care and discretion to prevent its inadvertent disclosure.

Confidential information consists of information in any medium that should be kept within the company.

Always take reasonable and necessary precautions to protect any confidential information relating to Aerocyonics or another company to which you have access. Do not disclose any confidential business information to anyone outside of Aerocyonics, even to members of your own family, unless the disclosure is:

- Properly authorized
- In connection with a clearly defined, legitimate business need
- Subject to a confidentiality agreement or non-disclosure agreement approved by management in collaboration with legal counsel

Even within our company and among your co-workers, you must only share confidential information on a need-to-know basis.

When you are entrusted or come upon confidential or proprietary information:

- Avoid discussing confidential information where it may be overheard. This includes discussions in company locations such as break rooms
- Do not display or leave confidential business information in plain view, on computer screens, in fax machines, photocopiers, or printers while unattended
- Store papers with confidential business information in cabinets, bins, or drawers that are properly secured, such as locked areas
- Properly dispose of confidential information through shredding
- Do not put in trash cans or recycling bins
- Protect information and documents stored in computer systems

If you come into contact or are inadvertently provided with proprietary information of another company, do not further disseminate the information. Report the issue for further direction.

This obligation of confidentiality does not prohibit you from raising concerns of potential COEBC or legal violations either with the company or to government authorities. Your ability to report legal violations internally or to a government authority, either during or after your employment is not prohibited by any Aerocyonics policy or agreement.



### Questions and Answers:

#### **What information is considered “confidential” or proprietary?**

“Proprietary information” is information that a company wishes to keep secret. It could include everything from internal business processes, to business proposals, design plans, employment contracts, or suppliers used.

“Confidential information” includes non-public information that, if improperly disclosed, could be useful to competitors or harmful to Aerocyonics, our suppliers, or another third party. For example, earnings, forecasts, business plans and strategies, significant restructurings, potential acquisitions, formulas, pricing, sales information, research, new product development, undisclosed marketing and promotional activity, significant management changes, and audit reports would all qualify as “confidential information”.

### Privacy

#### **If you access personal information, keep it secure and use it only as authorized.**

Personal information broadly refers to any information that identifies or relates to an identifiable person. If you have access to this type of information or the systems that maintain it, you must comply with all applicable policies, laws, and regulations regarding the processing of such information.

You must:

- Only access, collect and use personal information that you need and are authorized to see for legitimate business reasons
- Disclose personal information only to authorized persons who have a legitimate business reason to know the information and who are obligated to protect it
- Securely store, transmit, and destroy personal information in accordance with applicable policies, laws and regulations
- Promptly report any actual or suspected violations of our policies, data breaches, or other risks to personal information to the Aerocyonics Leadership Team in collaboration with our legal counsel or through [integrity@aerocyonics.com](mailto:integrity@aerocyonics.com)

We value our customers’ trust and respect the privacy of their information. If you handle customers’ personal information, you play an important role in protecting the information from inappropriate or unauthorized use or disclosure. As a general rule, make sure access to personal information is limited to authorized persons with a “need to know” basis of the information.



### Questions and Answers:

#### **What personal information does Aerocyonics collect and what information must be protected?**

Aerocyonics may collect personal information regarding our employees and business partners that include consumers, suppliers, contractors, customers, and shareholders. Such personal information must be protected at all times until its secure disposal. Examples include contact information such as residential addresses, phone numbers, email addresses, government assigned identification numbers, financial information such as banking details, credit cards, salary and other compensation information, and employment data such as performance records, benefits, and leaves of absence.

### External Communications

#### **You are not authorized to speak on behalf of our company.**

If you are contacted to discuss company business with any members of the media, investors or market analysts, do not provide any information. Instead, politely advise the outside party that you are not authorized to discuss the subject, and refer them to a spokesperson designated to speak on behalf of the company for these affairs.

Similarly, when using personal social media, be clear that you do not speak on behalf of the company. You should always:

- Take every possible precaution to ensure that you are not disclosing any confidential or proprietary information about Aerocyonics or our business partners
- Refrain from using any Aerocyonics or third-party logos or trademarks without written permission from management

Do not post photos, images, videos or audio clips from our facilities on social media that may disclose confidential or proprietary information about Aerocyonics. In addition, never represent or leave the impression that the views you express on social media are the views of our company.

### Intellectual Property

#### **Always use our trademarks and other intellectual property properly.**

We broadly define intellectual property as all information that provides us a competitive advantage and whose access and/or public disclosure we want to control and protect. Examples of such information include our trademarks, brands, package designs, logos, copyrights, inventions, patents, trade secrets, engineering and manufacturing ideas and designs, and marketing and strategic business plans. Never allow a third party to use our trademarks or other intellectual property without proper authorization and a license agreement that has been approved by our legal counsel. Furthermore, our trademarks should never be used in degrading, defamatory, or otherwise offensive manner.

Our intellectual property also includes employees' work products. As a company employee, any work you create, in whole or in part in connection with your duties, and/or using company time, resources or information, belongs to Aerocyonics. For example, inventions, ideas, discoveries, improvements, artwork, processes, designs, software or any other material you may help to create or author in connection with your work for our company belongs to Aerocyonics. You should promptly disclose any invention related to our business, so that it may receive the same protection as other intellectual property of our company.

### Email, Internet, and Information Systems

**You must use company email and all Internet based applications and accounts responsibly and protect the security of our information systems.**

Our information technology systems constitute a critical component of our business operations and are provided for authorized business purposes. Your use of these systems must be in accordance with acceptable business purposes and in accordance with appropriate security policies.

To safeguard our information systems, never:

- Share your system passwords with anyone
- Leave laptops or other mobile devices unattended while traveling or in an exposed location where they can be stolen
- Leave computers unlocked while they are unattended
- Download unauthorized or unlicensed software on Aerocyonics computers
- Open attachments or utilize links from suspicious emails

If you suspect a data breach or become aware of any situation in which data has been compromised, including the loss or theft of a laptop or handheld device, immediately report the situation to your manager or supervisor.

You may engage in a reasonable incidental personal use of phone, email and the Internet as long as it does not:

- Consume a large amount of time or resources
- Interfere with your work performance or that of others
- Involve illegal, sexually explicit, political, discriminatory or otherwise inappropriate material
- Relate to outside business interests
- Violate our COEBC or any other company policy

While it is generally not our practice to monitor employees' use of our information systems, Aerocyonics reserves the right to monitor, record, disclose, audit, and delete without prior notice the nature and content of an employee's activity using our company's email, phone, voicemail, and other systems, to the extent permitted by local law.

## Administering Our COEBC

We take our COEBC seriously. Following the COEBC enables our company and colleagues alike to grow and succeed. We are committed to conducting our business in accordance with all applicable laws and regulations with honesty, integrity, and respect.

### Investigating Misconduct

**Aerocyonics takes seriously all reports of misconduct.**

All reports of suspected violations of our COEBC, the law, or regulations will be taken seriously and promptly reviewed. As appropriate, an investigator(s) will be assigned to review all reported incidents of alleged COEBC violations. The investigator(s) will:

- Act objectively in determining facts through interviews and/or review of documents
- Contact employees who may have knowledge about the alleged incident(s)
- Recommend corrective actions and/or disciplinary measures where appropriate

In accordance with applicable laws, Aerocyonics strives to:

- Protect the confidentiality of the individuals involved, to the extent practical
- Inform an employee of the accusations reported against him/her/them at a time when such a disclosure will not jeopardize the investigation
- Where permissible, allow employees to review and correct information reported

If asked, you must fully cooperate with an inquiry or investigation.

### Disciplinary Actions

**If you violate our COEBC, the company will take appropriate disciplinary action.**

You are expected to follow the COEBC, and comply with our policies, the law and applicable regulations while conducting business on behalf of Aerocyonics as a condition of employment. Violating the COEBC, our policies, the law or regulations may result in:

- Disciplinary action, up to and including termination of employment, depending on the nature and severity of the COEBC violation
- In the case of a violation of law, civil and/or criminal penalties may be imposed by a governmental agency or in court

### Our COEBC is Not a Contract

Our COEBC is not a contract. It does not convey any specific employment rights or guarantee employment for any specific period of time.

### Amendments to our COEBC

Our COEBC is reviewed periodically by our management team and our legal counsel to determine if revisions may be required due to changes in the law or regulations, or changes in our business or business environment. The Aerocyonics Leadership Team must approve any changes to the COEBC.



### Acknowledgement

Each year, Aerocyonics distributes its COEBC to its officers and employees and requires acknowledgement that they have read and understand our COEBC. They must certify their compliance with the COEBC and disclose any potential conflict of interest or any other possible exception to compliance with the COEBC. Failure to comply with the certification process can be a COEBC violation and can subject you to disciplinary action and/or impact your performance reviews at the company's discretion, where permitted by law. In no circumstance does your failure to read our COEBC, sign an acknowledgement or certify compliance exempt you from your obligation to comply with the COEBC.

### Disclosure of Waivers

Any waiver of our COEBC requires the prior written approval of the President and CEO, and in certain circumstances, our legal counsel. If required by applicable law or regulations, waivers will be promptly disclosed in compliance with the law and applicable regulations.