



## AIREXPLORE CODE OF ETHICS AND BUSINESS CONDUCT

**REGARDLESS THE PLACE OF OPERATION, AIREXPLORE IS DETERMINED TO DO BUSINESS THE LEGAL WAY AND COMMITTED TO FOLLOW ETHICS AND INTEGRITY PRINCIPLES.**

*AirExplore has zero tolerance policy on corruption, cartels, human rights violations and breaches of safety and health protection rules.*

*This Code of Ethics and Business Conduct applies to all AirExplore employees (the term employee used hereunder includes all individuals who work full-time or part-time under a contract of employment and also covers independent contractors who are not originally treated as employees) and since we consider it important in our business relations, we therefore also expect our business partners to comply with these ethics and integrity principles and provisions.*

*Business partners include all regulatory entities, suppliers, service providers, external vendors, customers, advisors, corporates giving co-operation and other contracted partners of AirExplore. We, expect to follow the highest standards of ethics and business conduct including but not limited to the following.*

**Ethical Values and Principles** – *ethical values and basic principles such as law-abiding, responsibility, integrity, respect, honesty, fairness, caring, reliability and accountability are expected to adhere continuously.*

**Human rights** – *shall respect human rights provisions arisen from the United Nations Declaration on Human Rights.*

**Fair labor practices** – *we shall not tolerate any form of forced, bonded and child labor, in addition we shall commit to implement a fair policy of employment and remuneration in compliance with applicable laws.*

**Occupational Safety and Health Protection (OSHP)** – *regardless of our core activities, OSHP strategy shall comply with the relevant safety and health protection laws and regulations at all times.*

**Avoidance of discrimination** – *we shall not discriminate against anybody at all times of any professionally non-relevant trait or situation like sex, marital status, age, ethnic origin, color, religion and political conviction, disability or sexual orientation.*

**Communication** – *we and our business partners are expected to follow the highest standards of conduct in all verbal and written communication based on mutual trust, including all means of used communication systems.*





**Anti-Harassment** – we shall not engage in behavior that could be characterized as offensive, intimidating, humiliating, including sexually humiliating, malicious or insulting.

**Confidentiality** – we shall maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized or legally mandated. All confidential or proprietary information includes any non-public information that would be harmful to the relevant company or useful of helpful to competitors if disclosed. Business partners shall respect that valuable, confidential ideas, strategies and other types of business information created or developed by AirExplore considered as company property.

**Avoiding insider trading** – we shall not unlawfully use insider information for material gain or disclose insider information to unauthorized persons. Business partners must never spread false market rumors having significant impact on goodwill.

**Assets** – we shall protect the AirExplore assets and ensure their efficient use. All assets shall be used only for legitimate business purposes.

**Conflicts of interest** – each and every employee shall avoid any conflict of interest and shall not leave conflicts of interest unresolved unless approved by the Company. Employees shall never use or attempt to use their position to obtain any improper personal benefit for themselves, for their families, or for other person(s). Each employee who is aware of a conflict of interest or is considered that a conflict might develop, is required to discuss this matter with Company.

**Fair competition and fair dealing** – we shall conduct our operation in accordance with the norms of fair competition and in compliance with applicable competition laws. Moreover, we also do not seek competitive advantages through illegal or unethical business practices.

**Compliance with laws, rules, policies, regulations and standards** – it is our commitment to comply with all applicable laws, rules, policies, regulations and standards. It is a personal responsibility of each employee to adhere the standards and restrictions imposed by those laws, rules, policies and regulations.

**Privacy** – we shall respect people's privacy and comply with personal data protection regulation (GDPR). We only acquire and keep personal information that is necessary and provide adequate information to data owners in compliance with the regulation.



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For and on behalf of AirExplore, s.r.o.  
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