



**GLOBAL HELICOPTER MMRO SPECIALISTS**



# **Business Conduct, Ethics and Compliance Program**

**VIHAEROSPACE.COM**

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## TABLE OF CONTENTS

**Introduction to Manual ..... 3**

**Manual Certification / Compliance Statement..... 3**

**List of Effective Pages ..... 4**

**Revision Record..... 5**

**VIH AEROSPACE: OUR COMPANY, OUR PEOPLE, OUR CUSTOMERS..... 6**

**OUR EVERYDAY MISSION, VISION, and CORE VALUES ..... 6**

**About VIH Aerospace ..... 6**

**Our Mission ..... 6**

**Our Vision ..... 6**

**Our Core Values ..... 7**

**Our Focus..... 7**

**Our Commitment ..... 7**

**OUR PRINCIPAL BEHAVIOURS..... 8**

**MESSAGES FROM OUR LEADERSHIP TEAM..... 9**

**OUR EMPLOYEES ..... 10**

**Equal Opportunity ..... 10**

**Diversity..... 10**

**No Harassment ..... 10**

**Drug Free Workplace..... 10**

**Personal Data Protection ..... 10**

**Environmental Protection, Health, and Safety ..... 11**

**Political Contributions and Activities..... 11**

**Personal Conduct ..... 11**

**COMMITMENT TO OUR CUSTOMERS ..... 11**

**Protection of Assets and Information..... 11**

**Protection of Business Information, Intellectual Property, and Other Non-Tangible Assets..... 11**

**Protection of Physical Property and Assets..... 12**

**Records Management ..... 12**



**Accuracy of Business Records and Disclosures** ..... 13

**VIH AEROSPACE’S ETHICS AND COMPLIANCE PROGRAM** ..... 14

**PREAMBLE**..... 14

**ETHICAL NORMS** ..... 14

**GIFTS AND ENTERTAINMENT** ..... 14

**Gifts** ..... 14

**Cash Gifts**..... 15

**Gifts of a Ceremonial or Commemorative Nature** ..... 15

**Entertainment** ..... 15

**Improper Payments** ..... 16

**Customers and Suppliers**..... 16

**Business Partners**..... 16

**Transactions With Governments**..... 16

**Conflict of Interest**..... 16

**FRAUD, CORRUPTION, AND NON-COMPLIANCE** ..... 18

**CANADIAN COMPETITION ACT AND ANTI-TRUST LAWS**..... 18

**INTERNATIONAL TRADE**..... 18

**Import Controls** ..... 18

**Export Controls**..... 19

**Money Laundering**..... 19

**Canadian Economic Sanctions and Boycotts** ..... 19

**Dealing With Ambiguity**..... 19

**PERSONAL COMMITMENT**..... 20

**ACKNOWLEDGEMENT OF OUR BUSINESS CONDUCT, ETHICS, AND COMPLIANCE PROGRAM**..... 20



## Introduction to Manual

VIH Aerospace Inc. (VIH Aerospace) (VIHA), a division of VIH Aviation Group, is the holder of Approved Maintenance Organization Certificate 91-00 issued pursuant to Canadian Aviation Regulation (CAR) 573. This Business Conduct, Ethics, and Compliance Policy Manual is the property of VIHA and must be returned upon request.

This policy manual dictates policies for Business Conduct, Ethics, and Compliance and defines personnel responsibilities of all VIHA employees.

All personnel involved in activities on behalf of VIHA will have access to, and will comply with the contents of this policy manual. Failure to comply with the contents of this policy manual will constitute grounds for disciplinary action, including dismissal for cause.

Any revisions to, or deviations from this manual will be authorized by the VIH Aerospace General Manager. All personnel are encouraged to bring any concerns or suggestions regarding this policy manual to the attention of the General Manager.

## MANUAL CERTIFICATION / COMPLIANCE STATEMENT

The policies and procedures contained within this manual shall be strictly adhered to at all times.

Signed: Ken Norie Date: 09 July 2018

Signatures on file with original document

Ken Norie – President, VIH Aviation Group



**LIST OF EFFECTIVE PAGES**

Page	Revision	Date	Page	Revision	Date
1	Initial Issue	04 July 2018			
2	Initial Issue	04 July 2018			
3	Initial Issue	04 July 2018			
4	Initial Issue	04 July 2018			
5	Initial Issue	04 July 2018			
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8	Initial Issue	04 July 2018			
9	Initial Issue	04 July 2018			
10	Initial Issue	04 July 2018			
11	Initial Issue	04 July 2018			
12	Initial Issue	04 July 2018			
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20	Initial Issue	04 July 2018			

The contents of this Policy Manual have been revised to describe the Business Conduct, Ethics, and Compliance Program of VIH Aerospace.

Signed: Arne Arneson Date: 09 July 2018

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 Signatures on file with original document

Arne Arneson – General Manager, VIH Aerospace





# VIH AEROSPACE: OUR COMPANY, OUR PEOPLE, OUR CUSTOMERS

## OUR EVERYDAY MISSION, VISION, AND CORE VALUES

At VIH Aerospace we are committed to our employees and our customers through our values and relationships.

The committal to our most valuable asset, our employees, is reflected through our everyday vision and values in providing a safe and comfortable work environment free of harassments and conflict. To our customers we dedicate our ethical approach and our commitment to safe and reliable services and products. Both of our employee and customer obligations are achieved and promoted through our everyday mission, vision, and values which have become the highest standard of professional norms in conducting our daily business.

### ABOUT VIH AEROSPACE

VIH Aerospace offers top quality, value-enhanced helicopter maintenance, manufacturing, repair and overhaul (MMRO) services; including Supplemental Type Certificate (STC) development, & integrations, delivered effectively and professionally to meet or exceed Original Equipment Manufacturing (OEM) specifications.

VIH Aerospace is equipped to meet the changing demands of global marketplace clients; offering helicopter maintenance services and STC'd products of the very highest standards...delivered on-time and on budget.

### OUR MISSION

To provide the highest standard of helicopter MMRO Services, targeted at enabling our customers to achieve their mission objects in a safe, reliable, & cost-effective manner.

### OUR VISION

To provide high quality products, services and innovations, quickly and efficiently. To be a globally recognized leader in delivering superior quality and customer support through provision of best-in-class helicopter maintenance, manufacturing, repair and overhaul services, by...

- **Providing leadership** that encourages best practice and strives for continuous improvement.
- **Working collaboratively** with our OEMs, partners, vendors and team to provide optimal MMRO solutions for our customers.
- **Forging and enhancing** partnerships that drive us toward achieving our vision.
- **Enabling our team** and providing opportunities for career development.
- **Implementing, supporting and encouraging** best practice and continuous process improvement.

### **OUR CORE VALUES**

- **Integrity** - being true to our vision and mission, employees, and customers
- **Respect** - for all stakeholders, staff, customers, vendors, OEMs, and partnerships
- **Trust** - promote honesty, ethical principles, fairness, respect, transparency, and citizenship in our daily activities
- **Teamwork** - working together to achieve our mission and vision
- **Innovation** - identifying improvements and integrating them into our business operations
- **Excellence** - striving for improvements and integrating them into our business operations

### **OUR FOCUS**

- VIH Aerospace's strategic focus is to meet and exceed customer, OEM, and 3rd party relationship expectations through the reliable and predictable provision of our services and products.
- By focusing on our core services of helicopter and component MMRO, we will ensure the viability of our business and create a platform from which we can build and expand our business model so that we remain a global customer-preferred organization with which to conduct helicopter MMRO business.

### **OUR COMMITMENT**

- VIH Aerospace is committed to fair employment practices and to the adherence of applicable employment laws. This includes complying with the laws that prohibit improper employment, discrimination, child or forced labour, and harassment of any type.



## OUR PRINCIPAL BEHAVIOURS

- **Be Accountable** – We hold ourselves and others accountable for our execution. We deliver on our commitments.
- **Enable Change** – We challenge the status quo by striving for continuous improvement opportunities.
- **Make Others Successful** – We approach our work with a keen focus on how we can help our customers and each other to be more successful.
- **Think VIH Aerospace Enterprise** – We apply an enterprise perspective and mindset in decisions and actions. We think about what we are doing, how we are doing it, and how we can help strengthen our customer experience and our company.
- **Listen and Communicate** – We take the time to encourage and engage in two-way communication which includes active listening. At VIH Aerospace everyone has a voice.
- **Debate and Support Decisions** – We encourage and demonstrate debate, then get behind the decision and provide support.
- **Put the Customer First** – We focus on understanding and addressing the needs of our customers. This applies to everyone within VIH Aerospace regardless of the role we play.
- **Understand How We Add Value** – In order to add value to our company, we have a clear picture of what and how we are doing daily.
- **Think Globally** – We understand the constantly changing world around us. We view our opportunities, challenges, and resource needs within a global context as it applies to growth, cost, and talent. We understand our competitiveness across every dimension.
- **Live Our Mission, Vision, and Values** – It is essential to the future of VIH Aerospace that each and every one of us take a personal responsibility for leadership regarding our principals and that we always dedicate ourselves to continuous improvement. In return we will have a culture that fosters a safe workplace, values diversity, encourages communication, and respects innovation.

## MESSAGES FROM OUR LEADERSHIP TEAM

**Arne Arneson – General Manager:** As a 25 year member of the VIH Aerospace team and a 30 year aviation professional, I am extremely proud of our employees and honored to be a part of a company which supports its employees and stands behind our Business Conduct, Ethics, and Compliance Program. In these days of continual change, it becomes increasingly important for each and every one of us at VIH Aerospace to know and understand what is expected of a world class MMRO company. Therefore it's imperative that all of us lead by example and maintain the highest degree of integrity and ethical behavior in our daily activities. I urge you to review the important principals outlined in this policy and reflect on how they impact you personally, how they impact our business, and how they impact our customers. I am confident that by conducting ourselves with integrity, we can continue to maintain high ethical standards while achieving solid business objectives. It is my trust and expectation that as we carry out our daily activities, we take ownership of our responsibilities as VIH Aerospace continues to be a company of Global Helicopter MMRO Specialists.



**Ian Teschke – Director of Maintenance:** At VIH Aerospace, our employees are our greatest asset and as managers, supporting them in their daily routine is the very least we can do. This effort is only possible through adherence of our Business Conduct, Ethics and Compliance Program. There may be times when making the right choice appears neither simple nor apparent, yet at times our actions must be guided by a clear understanding of our legal and regulatory requirements. Please read these policies carefully. They are our guidelines in upholding our ethical commitment. All VIH Aerospace employees are expected to comply not only with the word of these policies but also in the spirit they invoke in our daily dealings. Thank you for safeguarding the trust others have placed in us through our efforts to live our values and make the right decisions every day.

**Brian Thistle – Manager, Business Development, Sales, & Marketing:** Through enhancing our brand and reputation, VIH Aerospace has made great strides in improving our operations and growing our business. When we fail to live up to the standards we set for ourselves and our customers, we risk damaging our business and credibility. It is important to recognize that we live in complex times and that is why I urge everyone to read and understand these policies. It really comes down to doing the right thing. It matters to our customers and it matters to the future of our company. As you go about your day to day work, I trust that you will continue to value responsible and ethical conduct and our core values of Integrity, Respect, Trust, Teamwork, Innovation, and Excellence.





## **OUR EMPLOYEES**

### **EQUAL OPPORTUNITY**

It is our policy to employ, train, promote, and compensate individuals based on merit, job-related qualifications and abilities. VIH Aerospace is committed to providing equal opportunity in employment regardless of race, colour, religion, national origin, sex, age, sexual orientation, marital status, handicap, disability, or status.

### **DIVERSITY**

At VIH Aerospace we value the differences among our employees. Individual differences enrich the workplace and improve our ability to attract employees and work with customers in today's global MMRO marketplace. We believe a work environment which values individual differences and encourages the full contribution of every employee, creates a stronger company.

### **NO HARASSMENT**

Any type of harassment by or against any employee will not be tolerated. Sexual harassment is of special concern. Prohibited conduct includes the making of unwelcome sexual advances or engaging in any other conduct with sexual overtones which interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment.

### **DRUG FREE WORKPLACE**

Possession, usage, sale, or distribution of an illegal drug or controlled substance in the workplace or while conducting company business off premises is strictly prohibited. Illegal drugs and controlled substances have an adverse effect on employee performance, jeopardize the safety of co-workers, and constitute a risk to the business and interests of VIH Aerospace. Alcohol use may have an adverse effect on performance and safety and poses a risk to the business and interests of VIH Aerospace. An employee who reports to work under the influence of, or is unfit to work because of the effects of alcohol or drugs is subject to disciplinary action, up to and including termination of employment consistent with the requirements of local laws. VIH Aerospace reserves the right to search items on company property, including but not limited to offices, desks, computers, cars, and lockers at any time, to the full extent of local laws.

### **PERSONAL DATA PROTECTION**

It is VIH Aerospace's policy that we take appropriate steps to protect information relating to individuals, whether they are employees, customers, or suppliers. Our company is responsible for collecting, processing, and transferring personal data only for lawful and legitimate business purposes. Care must be used to safeguard the confidentiality and security of personal data and to respect individual privacy.



## **ENVIRONMENTAL PROTECTION, HEALTH, AND SAFETY**

VIH Aerospace is committed to being an environmentally responsible company and to providing a safe and healthy workplace for our employees. VIH Aerospace will comply with all applicable environmental, health, and safety laws and regulations not only in Canada, but in every country VIH Aerospace does business. Managers, supervisors, and company legal counsel are available to provide more information on applicable laws and regulations.

## **POLITICAL CONTRIBUTIONS AND ACTIVITIES**

Contributions of company funds or the use of company assets or facilities for the benefit of political parties or candidates anywhere in the world is prohibited unless approved in advance by the company legal counsel. VIH Aerospace encourages all employees to participate personally in the political process and to support the political parties and candidates of their choice.

## **PERSONAL CONDUCT**

It is the policy of VIH Aerospace to treat employees with fairness. In return, VIH Aerospace expects employees to adhere to the established standards of conduct and performance enabling all to work together to achieve our business objectives. General standards of conduct and performance apply throughout VIH Aerospace when employees are on duty or are in a situation where they can be readily identified as a representative of VIH Aerospace.

## **COMMITMENT TO OUR CUSTOMERS**

### **PROTECTION OF ASSETS AND INFORMATION**

VIH Aerospace and its employees must properly use, protect, and safeguard company property both tangible and intangible, as well as the property of our customers, suppliers, and business partners that is in our possession.

### **PROTECTION OF BUSINESS INFORMATION, INTELLECTUAL PROPERTY, AND OTHER NON-TANGIBLE ASSETS**

VIH Aerospace's policy is to safeguard the intellectual property assets and proprietary information of the company as well as that of third parties, including that of our customers, suppliers, and business partners. Our employees are expected to properly use, respect, and protect such information and assets, whether in paper or electronic form. This includes proprietary business information and other intellectual property such as patents, trade secrets, copyrights, trademarks, information technology (such as software and data) and all company records created or maintained in both paper and electronic format.



Any and all documents, inventions, writings, records, software codes, applications, or other intellectual property created by VIH Aerospace employees in the course of their duties with VIH Aerospace resources are considered works for hire and as such are deemed company property. These items must be appropriately protected, and considered confidential information.

Protection of non-public company information is especially important. Unauthorized use or release of information regarding plans, strategies, costs or prices, pending contracts, or unannounced products could jeopardize the company's competitive position or result in violations of securities laws, and is prohibited. In order to better protect non-public information, all proprietary company business information and information of our customers, suppliers, and business partners, should be disseminated internally only on a "need-to-know" basis.

For more information regarding recommended processes for protecting the company's intangible assets, please consult your immediate supervisor.

### **PROTECTION OF PHYSICAL PROPERTY AND ASSETS**

All VIH Aerospace employees must properly protect the security of our employees and our workplaces. This includes properly securing the physical property of the company and of our customers, including the government, suppliers, and business partners, which is in our care or possession. This applies to the physical assets of all kinds and types, including VIH Aerospace's facilities and the assets of employees and third parties who work at our facility or visit VIH Aerospace's facilities. It also applies to documents, materials, equipment, supplies, inventory, facilities, and communication equipment such as computers, cell phones, and personal digital devices.

For more information regarding recommended processes for protecting the company's information technology assets, please consult your immediate supervisor or our information technology department.

### **RECORDS MANAGEMENT**

VIH Aerospace receives thousands of records in the course of its business. Records are retained and disposed of as defined in the VIH Aerospace Company Procedures Manual (CPM), section 4.1. These procedures meet and exceed Canadian regulatory and International Quality Management Systems standards. Records will be disposed of in a manner consistent with the degree of confidentiality and sensitivity required by the information within the record. The company will comply with all requirements established by law that require the preservation of specific records, including legal holds that may be imposed by company legal counsel in connection with anticipated or actual legal litigation or investigations. Each employee should become familiar with and follow all applicable company policies and procedures that pertain to records management and careful communications.

For more information regarding records management, please consult the Company Procedures Manual (CPM), section 4.1, your immediate supervisor, or our Quality Assurance Manager.



## **ACCURACY OF BUSINESS RECORDS AND DISCLOSURES**

### **BUSINESS RECORDS**

Government agencies, customers and suppliers rely upon the integrity of our business records. All business records such as timecards, purchase orders, quality reports, certifications, and financial records, must accurately reflect the transactions of the company in accordance with all applicable requirements. VIH Aerospace will not create or permit false or misleading entries to be made in the records of the company under any circumstances.

### **PUBLIC DISCLOSURES**

VIH Aerospace requires full, fair, accurate, timely, and understandable disclosure in reports and documents that are filed with or submitted to our government agencies and in other public filings and communications. All employees who are involved in the preparation, review and dissemination of such information are subject to these requirements.



# VIH AEROSPACE'S ETHICS AND COMPLIANCE PROGRAM

## PREAMBLE

VIH Aerospace is a Canadian based company, committed to complying with all applicable laws and regulations, wherever we do business. Our employees, no matter where their work takes the globally, must be familiar with and comply with Canadian and International Laws that impact our global operation.

VIH Aerospace's Ethics and Compliance Program has been established to prevent, detect, and correct unethical or non-compliant behavior and to ensure that our business is always on the correct legal and ethical path.

## ETHICAL NORMS

VIH Aerospace commits itself to promoting the highest standard of professional ethical norms and values for our employees. Norms are established standards of conduct that are expected and maintained by society, companies, and/or professional organizations. Values represent the collective conception of what communities find desirable, important, and morally proper. Values also serve as the criteria for evaluating our own personal actions and the actions of others. As a company, VIH Aerospace realizes that we not only serve our customer expectations but also act as stewards of society in creating, facilitating, and executing the transactions that are part of our daily business. In this role, VIH Aerospace and its employees are expected to embrace the highest professional ethical norms and the ethical values implied by our responsibility to our customers, our government, and our laws. As a company, we must:

**Do No Harm.** This means consciously avoid harmful actions or omissions by embodying the high ethical standards and adhering to all applicable laws and regulations in the choices we make.

**Foster Trust.** This means striving for good faith and fair dealings

**Embrace Ethical Values.** This means building relationships and enhancing consumer confidence by affirming our core values of Integrity, Respect, Teamwork, Trust, Innovation, and Excellence.

## GIFTS AND ENTERTAINMENT

### GIFTS

Unless properly approved, VIH Aerospace employees should not give or receive business gifts of more than a nominal value to or from entities with whom the company does business as gifts can affect or might appear intended to affect the judgment of the person receiving the gift.

Where laws or business policy do not provide otherwise, gifts having a monetary value of \$75 CDN or less are permitted. The giving or receiving of gifts in excess of \$75 CDN requires the approval of the employee's direct supervisor, manager, or company legal counsel, depending on the situation. Any gifts, which are not permitted or have not been approved should be declined or turned over to the company.

Gifts to Government Officials in many countries are governed by laws and regulations and should not be made without first understanding what is legally permissible. Consultation with the company legal counsel will ensure that these laws and regulations are not violated.

### **CASH GIFTS**

A gift or receipt of cash, or cash equivalent such as a gift card, to an employee of a business partner or family member of such an employee, in connection with VIH Aerospace business, is strictly prohibited.

Questions regarding gifts should be resolved by the employee's direct supervisor, manager, or company legal counsel, depending on the situation.

### **GIFTS OF A CEREMONIAL OR COMMEMORATIVE NATURE**

Gifts of a ceremonial or commemorative nature in excess of \$75 CDN may be appropriate under certain circumstances. An example could be a framed photograph or plaque given to commemorate a project or special occasion. Factors to consider are whether the item is reasonable and customary, is in accordance with applicable laws, and is either to be given at a delivery of a product or service, or commemorates the conclusion of a sale, or other ceremony, where there is little risk that such an item will create an expectation of something in return and/or has limited resale value (e.g. inscribed with a customer's name or date of ceremony). As always, gifts of this nature should not be given for the purposes of affecting the judgement of the receiving party.

### **ENTERTAINMENT**

The giving or receiving of reasonable and customary meals and entertainment in the normal course of business is permitted in instances where laws or business unit policy do not provide otherwise.

Lavish meals or inappropriate entertainment should always be avoided.

VIH Aerospace employees must know and comply with all applicable restrictions on providing meals, entertainment, gifts, or gratuities to employees or agents of any government. Special care must be given when Government Officials are involved as the laws pertaining to Government Officials vary from country to country and even within country. In some jurisdictions virtually all gifts and entrapment of Government Officials is prohibited.

Questions regarding entertainment should be resolved by the employee's direct supervisor, manager, or company legal counsel, depending on the situation.





### **IMPROPER PAYMENTS**

Payment or acceptance of bribes, kickbacks or other improper payments while conducting VIH Aerospace business is prohibited. This prohibition applies to dealings with current or potential customers, suppliers, representatives, consultants, or other business partners seeking to establish a relationship with VIH Aerospace.

Many countries have enacted laws prohibiting bribery of Government Officials as well as commercial bribery. As VIH Aerospace deals with customers throughout the world, we are subject to the applicable laws governing the country, state, and local municipal government.

### **CUSTOMERS AND SUPPLIERS**

VIH Aerospace works to build strong relationships with our customers and suppliers based on lawful and honest business practices in the best interest of VIH Aerospace. We are committed to providing the highest standard of helicopter MMRO Services, targeted at enabling our customers to achieve their mission objects in a safe, reliable, and cost-effective manner.

When we contract for goods and services on behalf of VIH Aerospace, we should avoid doing anything that might compromise our objectivity or impair VIH Aerospace's reputation. Our purchasing decisions should always be based on appropriate business criteria such as price, quality, technical leadership, reliability, and the reputation of the supplier.

### **BUSINESS PARTNERS**

VIH Aerospace's business partners are an extension of our company and should be closely monitored carefully. When agents, sales representatives, dealers, distributors, consultants, or joint venture partners are engaging VIH Aerospace business, they are required to comply with applicable laws and to adhere to standards of business conduct consistent the policies outlined in this document.

### **TRANSACTIONS WITH GOVERNMENTS**

In doing business with Government Officials in any country, VIH Aerospace is committed to acting with honesty and integrity and will comply with all applicable laws and regulations. When we sell goods or services to any government, we must know and comply with applicable procurement policies.

### **CONFLICT OF INTEREST**

VIH Aerospace respects the rights of all employees in personal activities outside of work. However, each of us has the responsibility to avoid activities which conflict or appear to conflict with our job responsibilities or the interests of VIH Aerospace. Any employee activity which may involve a conflict of interest or even the appearance of a conflict of interest must first be approved by the employee's direct supervisor, manager, or company legal counsel, depending on the situation.

THE FOLLOWING ARE EXAMPLES OF CONFLICTS OF INTEREST:

- Engaging in employment or any other activity that interferes with our ability to devote the required time and attention to our job responsibilities at VIH Aerospace.
- Holding a significant financial interest in a current or prospective customer, supplier, or competitor of VIH Aerospace, or serving as an employee, consultant, or director of that business.
- Directing VIH Aerospace business to a supplier owned or managed by a relative.
- Supervising the job performance or compensation of a relative.
- Using confidential VIH Aerospace information or improperly using company assets for personal benefit or the benefit of others.

## **FRAUD, CORRUPTION, AND NON-COMPLIANCE**

### **CANADIAN COMPETITION ACT AND ANTI-TRUST LAWS**

The laws that govern the ways in which companies compete in Canada are governed by the Canadian Competition Act, Antitrust Laws in the USA, and Competition Laws in Europe and elsewhere. These laws are intended to prevent anticompetitive behavior such as price fixing, bid rigging, and other forms of collusion by businesses that should be competing vigorously on the basis of price, quality, and service. These types of acts or laws are enforced by national and state governments and by regional organizations. Penalties for violation can be very large fines for companies and fines and prison sentences for individuals.

VIH Aerospace requires that the company and its employees comply with the Competition and Antitrust Laws in all countries in which we do business. While the wording of the laws in all countries may differ, their goals are quite similar; to ensure that companies compete vigorously for business. The economic assumption behind such laws is that competition in the marketplace benefits the consumer by keeping prices low and quality of goods and services high. The laws also address situations in which one large company dominates its market so that effective competition is reduced.

VIH Aerospace's goal of offering products that are competitive in quality, reliability, and price is to be achieved without sacrificing business integrity. We will use only proper and legal means of gathering marketing and business information concerning competitors.

Application of the Competition Act and Antitrust Laws to actual situations can be complex. Prior to consultation close coordination with our company's legal counsel is essential to ensuring these laws are complied with and problems are avoided.

### **INTERNATIONAL TRADE**

Often VIH Aerospace conducts operations and trade across national borders. Various laws and regulations may apply to such trade including:

#### **IMPORT CONTROLS**

Employees who are involved in the importation of products or commodities must ensure that such items are given the correct classification, valuation, and country of origin and that all import documentation is accurate and complies with the applicable laws and regulations.

## **EXPORT CONTROLS**

Many countries have laws that restrict the export of goods and technology. Items which are for military purposes, or which may be involved in the development or production of products or technology for military purposes, are often a primary focus of such controls. The U.S. has controls, which restrict the export of certain products, services, technical data, and software to other countries, as well as the re-export of those items from one non-U.S. destinations to another. There are also U.S. trade embargoes against certain countries and individuals associated with those countries, as well as named terrorists and drug traffickers. VIH Aerospace operations worldwide must comply with all applicable U.S. export control laws as well as global export laws.

For more information, please contact our Controlled Goods Designated Official regarding policies and procedures necessary to comply with import and export control guidelines.

## **MONEY LAUNDERING**

People who are involved in bribery, narcotics trafficking, or other criminal activity may try to “launder” the proceedings of crime to hide them or to make those proceeds appear legitimate. Many countries now have laws against money laundering which prohibit the acceptance or processing of the proceeds of criminal activity. VIH Aerospace must comply with such laws and conduct business with only reputable customers. Employees who are involved in the receipt of payments from customers must perform appropriate due diligence to verify whether a payment should be accepted. Any issues suspected or identified must be reviewed by VIH Aerospace’s legal counsel.

## **CANADIAN ECONOMIC SANCTIONS AND BOYCOTTS**

Canadian laws as well as the laws of many other countries prohibits companies from participating in or cooperating in restrictive trade practices or economic boycotts imposed by other nations.

Canadian sanctions are imposed under the United Nations Act (UNA), the Special Economic Measures Act (SEMA), or the Justice for Victims of Corrupt Foreign Officials Act (JVCFOA). Contravening a Canadian sanctions law may be a serious criminal offence and as such, VIH Aerospace abides by these laws and closely monitors through the Canadian Government any of the countries who have been identified as prohibited in our business dealings. Any and all concerns should be dealt through your supervisor, manager or VIH Aerospace’s legal counsel.

## **DEALING WITH AMBIGUITY**

Sometimes, it is not easy to determine the ethical or “right” direction or decision to make in a particular work situation. There are many complex rules, regulations, and laws that govern the manner in which we must conduct our business. One purpose of our Ethics and Compliance Program is to provide guidance that will help direct an employee in making the right decision. **When the answer is not clear, ask.**



## **PERSONAL COMMITMENT**

### **ACKNOWLEDGEMENT OF OUR BUSINESS CONDUCT, ETHICS, AND COMPLIANCE PROGRAM**

I acknowledge that I have personally read and understand the VIH Aerospace Business Conduct, Ethics, and Compliance Program.

I know if I have any questions or concerns about compliance or any of the above statements, I must promptly direct my concerns to my immediate supervisor or manager.

I understand my obligation to promptly report to VIH Aerospace any violations of the Business Conduct, Ethics and Compliance Program that I suspect or know knowledge of today or which may come to my attention in the future, including any violation of law.

**Please Complete the Information Below by Printing Clearly.**

---

Name

---

VIH Aerospace Department

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Date

---

Signature