



EVO Jet Services, Ltd. 244-248 Des Voeux Rd. Suite 701 / Central District, Hong Kong

Company Compliance Program

Module 1: General Business Conduct, Ethics, Conflicts of Interest

Module 2: US FCPA

Module 3: Sanctioned Countries and SDN's

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This page read and understood by name: _____ initialed _____



EVO Jet Services, Ltd. 244-248 Des Voeux Rd. Suite 701 / Central District, Hong Kong

MODULE 1 BUSINESS CONDUCT / COMPLIANCE PROGRAM

EVO Jet Services, Ltd. depends on exemplary conduct of its employees and management to reinforce its good name in the industry. Without a good name and reputation, EVO Jet and the families that depend on it cannot succeed.

Compliance with laws and EVO Jet polices and best practice is mandatory and is not an option for any employee.

The EVO Jet Compliance Policy is designed to protect the company and its employees and to ensure solid steady corporate growth that is free of conflicts of interest, violations of law, dishonesty and ethical misconduct.

EVO Jet relies on all of its employees and internal processes to maintain ethical, legal and fair conduct in all business dealings with customers, business partners and vendors. All EVO Jet employees have an obligation to take a personal interest and responsibility for protecting EVO Jet's good name by:

- Knowing the best practices of good work behavior:
Before taking any actions on behalf of EVO Jet, every employee must have learned EVO Jet's company policies, legal policies and company procedures. Without having read and understood EVO Jet's complete compliance policy rules and guidelines, employees are not permitted to take action on behalf of EVO Jet.
- Abiding by all local and international laws, follow the policies and procedures of the Company, behave ethically and respectfully towards all other personnel both inside and outside of EVO Jet.
- Upholding the highest ethical standards while under the employ of EVO Jet. Employees are also required to hold vendors, customers and partners to high ethical standards.
- Questioning and reporting any activities by either employees of EVO Jet, vendors, customers or business partners that may be in violation of EVO Jet standards of practice. Each employee should report, illegal, dishonest or unethical actions by the company or any of its employees, representatives, or customers and vendors.
- Contacting the Compliance Committee with questions at any time. Ask a question and wait for an answer before taking actions if a matter is questionable. Visit EVO Jet's compliance resource page at <https://www.evo-jet.com/compliancepolicies>

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EVO JET GUIDE TO BUSINESS CONDUCT

To be provided to Customers and Vendors

EMPLOYEE CONDUCT

Our business at EVO Jet is based on professionalism reflected in standards of work and ethics. Our professionalism translates to respect for each other as well as respect for laws, policies and procedures that exist to strengthen our performance, relationships and future ethical success.

All EVO Jet employees must therefore comply with the company's policies. No person may ask any EVO Jet employee to break the law, or go against the company's policies and procedures.

Health and Safety

EVO Jet and its employees will not risk health or safety for profit or other gain.

Employees must not use, own or deal with illegal drugs while employed by EVO Jet.

Employees are not permitted to work if under the influence of alcohol or illegal drugs or drugs that cause drowsiness or lack of awareness

Employees who create unsafe work conditions for themselves or others or who threaten or act violently while at work shall be immediately terminated.

Mutual Respect and Diversity

Diversity is an asset to EVO Jet. Employees must respect all people with whom they work regardless of culture, race, background, education, etc.

Harassment

EVO Jet does not tolerate any form of harassment whatsoever. Harassment is defined but not limited to these examples:

- Jokes, insults, threats, and other unwelcome actions about a person's race, color, gender, age, religion, national origin, ancestry, sexual orientation, citizenship, disability, veteran status, social or economic status or educational background.
- Unwelcome sexual advances, requests for sexual favors, and other unwelcome verbal or physical conduct of a sexual nature, or the display of sexually suggestive objects or pictures.
- Verbal or physical conduct that upsets another's work performance or creates a fearful or hostile work environment.

CONDUCT INVOLVING OUR BUSINESS PARTNERS

Our values, honesty, and behavior do not stop with our actions, or in our company. We expect the same from our suppliers, customers and others who do business with us.

Conflicts of Interest

- No employee should represent EVO Jet in a business deal if he or she, a family member or a close friend has a financial interest.
- No employee should take any business action for personal benefit, or to benefit a relative or close friend.

Proper Use

No receipt or payment of funds, property, service or anything else of value shall be received by, or made by, EVO Jet if it will be used for any unlawful purpose or for any purpose other than described in the documentation that supports the transaction.

Gifts and Entertainment

- No gift, favor, or entertainment should be accepted or provided if it will obligate or appear to obligate the person who receives it.
- Receiving or giving gifts of cash or cash equivalents is never allowed.
- Company employees may accept or give gifts, favors and entertainment only if they meet all of the following criteria:
 1. They are not against the law or the policy of the other parties' company.
 2. They are consistent with customary business practices in the country or industry.
 3. They are reasonably related to business relationships.
 4. They do not cost too much, and are consistent with any existing Business Unit guidelines.
 5. They cannot be viewed as a bribe, payoff or improper influence.
 6. Public disclosure of the facts would not embarrass the company or the employee.
 7. They do not violate our business values or ethics in any other manner.
- It is never acceptable to request or ask for personal gifts, favors, entertainment or services.
- To prevent conflicts around gift giving, it is often helpful at the start of a business relationship to discuss what is not allowed.

Fair Competition and Antitrust

EVO Jet representatives may not discuss or enter into a formal or informal agreement with any competitor about prices, or matters affecting price, production levels or inventory levels, bids, or dividing production, sales territory, products, customers or suppliers.

Agreements with customers or suppliers that establish the resale price of a product, limit a customer's right to sell products, or condition the sale of products on an agreement to buy other EVO Jet products are not allowed in many jurisdictions.

Sharing Information

Unless sharing information with external suppliers and customers is against the law, or company or business practice, EVO Jet encourages sharing information when it may improve the quality, or use of, our products. If EVO Jet proprietary information is given outside the company, Employees shall make sure a written confidentiality and non-disclosure agreement is prepared and signed and that proper controls are established to manage the flow of information.

Gathering and Using Competitive Information

EVO Jet employees:

- may only gather information by legal means.
- must never use any illegal or unethical means to get information about other companies.
- will not share confidential information from suppliers or customers with anyone outside EVO Jet without written permission.

- will be sure to follow the terms and conditions of agreements that are signed to protect information.

Customer Relations

- EVO Jet and its Employees will compete for business in a normal professional manner that is aggressive and legal
- EVO Jet and its Employees shall not misrepresent itself, its personnel, its services or its pricing.
- EVO Jet and its Employees shall not make any false claims about competitors and their services and pricing.
- EVO Jet and its Employees will follow local government regulations in the provision of products and services to clients.

Compliance with Applicable Law

- EVO Jet and its Employees must follow all laws, regulations and company policies that govern their work. Laws and regulations may differ, depending on the country or state in which we work. No excuse or pressure justifies breaking the law. Do not use a consultant, representative or contractor to break the law. In some countries, certain conduct is banned but the ban is not currently enforced. This does not excuse any illegal action by an EVO Jet employee.
- EVO Jet and its Employees shall base all purchase decisions on the best value received by EVO Jet for itself and its clients. Purchase of goods and services shall be evaluated only on the merits of price, quality, performance and suitability.
- EVO Jet and its Employees shall avoid reciprocal agreements or exchange of favors.
- The fee or price paid for goods and services by EVO Jet must represent the value of the goods or services provided.

EVO Jet and its Employees will not knowingly use suppliers who participate in the following activities:

- Supply unsafe products or services.
- Break laws or regulations.
- Use child labor or forced labor.
- Use physical punishment to discipline employees, even if when it is allowed by local law.

Money Laundering

Money laundering is the process by which individuals or entities try to conceal unlawful funds, or otherwise make these funds look legitimate. EVO Jet and its Employees will not condone, facilitate or support money laundering.

Anti-Corruption

EVO Jet policy prohibits bribery, or giving money or anything of value directly or through other parties, to any government official in order to influence their decision. Due to links with the United States by various means, EVO Jet shall adopt a comprehensive Compliance Program the specifically addresses compliance with the United States “Foreign Corrupt Practice Act.”

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International Trade

Since EVO Jet has links to the United States, all EVO Jet locations must comply with economic sanctions and trade embargoes imposed or approved by the United States Government.

CONDUCT REGARDING OUR BUSINESS RESOURCES

EVO Jet's shareholders trust the Employees to properly operate, buy, sell, use and protect the assets of the company, and to respect the property and rights of others.

Accuracy of Records and Reports

Employees shall be sure that any document, statement or communication they prepare or sign is correct and truthful.

Intellectual Property and Copyrighted Material

- EVO Jet and its Employees will respect and honor the intellectual property rights of others. We will not use the patent rights of others without first obtaining a license or the approval of EVO Jet legal counsel.
- Copyright laws protect many materials used in the course of our work. We may not reproduce, distribute, or alter copyrighted materials owned by others unless we have prior permission.

CONDUCT INVOLVING OUR COMMUNITIES

EVO Jet will be a good community partner. We will positively add to the communities where we do business.

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Code of Ethics - EVO Jet Services Ltd.

EVO Jet Services, Limited will conduct its business honestly and ethically wherever we operate in the world. We will constantly improve the quality of our services, products and operations and will create a reputation for honesty, fairness, respect, responsibility, integrity, trust and sound business judgment. No illegal or unethical conduct on the part of officers, directors, employees or affiliates is in the company's best interest. EVO Jet Services will not compromise its principles for short-term or long-term advantage. The ethical performance of this company is the sum of the ethics of the men and women who work here. Thus, we are all expected to adhere to high standards of personal integrity.

Officers, directors, and employees of the company must never permit their personal interests to conflict, or appear to conflict, with the interests of the company, its clients or affiliates. Officers, directors and employees must be particularly careful to avoid representing EVO Jet Services in any transaction with others with whom there is any outside business affiliation or relationship. Officers, directors, and employees shall avoid using their company contacts to advance their private business or personal interests at the expense of the company, its clients or affiliates.

No bribes, kickbacks or other similar remuneration or consideration shall be given to any person or organization in order to attract or influence business activity. Officers, directors and employees shall avoid gifts, gratuities, fees, bonuses or excessive entertainment, in order to attract or influence business activity.

Officers, directors and employees of EVO Jet Services Ltd. will always follow the laws of any country in which they are conducting business.

Officers, directors and employees of EVO Jet Services Ltd. will often come into contact with, or have possession of, proprietary, confidential or business-sensitive information and must take appropriate steps to assure that such information is strictly safeguarded. This information – whether it is on behalf of our company or any of our clients or affiliates – could include strategic business plans, operating results, marketing strategies, customer lists, personnel records, upcoming acquisitions and divestitures, new investments, and manufacturing costs, processes and methods. Proprietary, confidential and sensitive business information about this company, other companies, individuals and entities should be treated with sensitivity and discretion and only be disseminated on a need-to-know basis.

Officers, directors and employees will refrain from gathering competitor intelligence by illegitimate means and refrain from acting on knowledge that has been gathered in such a manner. The officers, directors and employees of EVO Jet Services Ltd. will seek to avoid exaggerating or disparaging comparisons of the services and competence of their competitors.

Officers, directors and employees will obey all Equal Employment Opportunity laws and act with respect and responsibility towards others in all of their dealings.

Officers, directors and employees will remain personally balanced so that their personal life will not interfere with their ability to deliver quality products or services to the company and its clients. Officers, directors and employees agree to disclose unethical, dishonest, fraudulent and illegal behavior, or the violation of company policies and procedures, directly to management.

Violation of this Code of Ethics can result in discipline, including possible termination. The degree of discipline relates in part to whether there was a voluntary disclosure of any ethical violation and whether or not the violator cooperated in any subsequent investigation. Remember that good ethics is good business.

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EVO Jet Services, Ltd. Business Ethics and Conduct STATEMENT BY OFFICER/DIRECTOR/EMPLOYEE

1. I have read the entire the Company Compliance Program and Code of Ethics of EVO Jet and hereby state I understand the policies and program and agree to abide by all the standards.

Yes _____ No _____

2. Are you aware of any illegal, unethical or improper practices or conduct anywhere within this Company?

Yes _____ No _____

If the answer to the preceding question is "yes", list here, in full and complete details, all such practices or conduct. (Use additional pages if necessary.)

3. Have any threats or promises been made to you in connection with your answers to the questions on this form?

Yes _____ No _____

If "yes" please identify them in full and complete detail and notify company management immediately.

I understand that I am required to report any illegal, dishonest or unethical actions by the company or any of its employees, representatives, or customers / vendors which come to my attention to the Compliance Committee at compliance@evo-jet.com.

I declare under penalty and perjury, under the laws of the _____ of _____ that the forgoing is true and correct. Executed this _____ day of _____, _____, at _____.

EMPLOYEE

COMPANY

Authorized Signature

Authorized Signature

Print Name and Title

Print Name and Title

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