



# **BUSINESS CODE OF CONDUCT AND ETHICS MANUAL**

<b>Zenith Aviation, Inc.</b>	<b>Ethics</b>
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**DISCLAIMER:**

Zenith Aviation maintains the most current version of this manual and all of its subsections on the company's Quality Shared Drive in electronic form. We do not regularly print updated forms or documents, so the information found herein may be dated and/or obsolete.

This version was reviewed and printed on \_\_\_\_\_ and as such more current information may be available. Please contact the undersigned if you would like to review the electronic version.

Thank you

**Angela Shawaryn**  
**Vice President / General Manager**  
Zenith Aviation

<b>Zenith Aviation, Inc.</b>	<b>Ethics</b>
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**Management Approval**

Name	Signature	Date
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**1. Zenith Aviation Business Code of Conduct and Ethics—Overview**

Zenith Aviation is committed to the highest standards of business conducts and ethics.

This manual (the “Code”) documents the business practices and principles that support this commitment to ethics. All employees are expected to read and understand the Code and its application to their work.

Officers and supervisors are expected to promote a sense of commitment to the spirit and letter of the Code. Supervisors are also expected to ensure that all vendors conform to standards when working for or on behalf of Zenith Aviation. A supervisor’s ability to promote and develop compliance will be a significant factor in evaluating performance. In addition, employees who make exemplary efforts to implement and uphold Zenith Aviation legal and ethical standards will be recognized for their effort in their performance reviews.

The Code cannot possibly describe every practice or principle related to honest and ethical conduct. The Code addresses conduct that is particularly important to proper dealings with the people and entities with whom we interact, including our coworkers, clients, contractors, suppliers, the governments that regulate our activities and members of our community, and establishes our commitment to the highest ethical standards. From time to time we may adopt additional policies and procedures with which employees and managers are expected to comply. However, it is the responsibility of each employee to apply common sense, together with his or her own highest personal ethical standards, in making business decisions where there is no stated guideline in the Code or in our other policies and procedures. Unyielding personal integrity is the foundation of corporate integrity. The integrity and reputation of Zenith Aviation depends on the honesty, fairness and integrity of every employee.

Conduct by members of your immediate family, significant others or other persons who live in your household may potentially result in ethical issues to the extent that they involve Zenith Aviation. For example, acceptance of inappropriate gifts by a family member from one of our suppliers could create a conflict of interest and result in a Code violation attributable to you. Consequently, in complying with the Code, you need to consider not only your own conduct, but also that of your immediate family members, significant others and other persons who live in your household.

We encourage you to ask questions and voice concerns without fear of any form of retaliation.

Violations of the Code will not be tolerated. Any employee who violates the standards in the Code may be subject to disciplinary action, up to and including termination of employment and, in appropriate cases, civil legal action or referral for criminal prosecution.

## **2. Respect for Employees of All Backgrounds**

As a Zenith Aviation employee, you are critical to our success, and we will treat you with fairness and respect.

Zenith Aviation is an equal opportunity employer. We do not tolerate discrimination against applicants or employees based on race, religion, gender, age, marital status, national origin, sexual orientation, citizenship status, or disability. We prohibit discrimination in decisions concerning recruitment, hiring, compensation, benefits, training, termination, promotions, or any other condition of employment or career development.

We are committed to providing a work environment that is free from discrimination or harassment. We will not tolerate the use of discriminatory slurs, unwelcome unsolicited sexual advances or harassment, or any other remarks, jokes or conduct that creates or fosters an offensive or hostile work environment. Employees at all levels of the organization must act with respect and civility towards clients, coworkers and outside firms.

Being treated fairly means that managers will evaluate you according to your merits, not according to arbitrary factors.

## **3. Legal Compliance**

Obedying the law, both in letter and in spirit, is the foundation of this Code. Our success depends upon every employee operating within legal guidelines and cooperating with local, national and international authorities. It is therefore essential that you understand the legal and regulatory requirements applicable to your business unit and area of responsibility. While we do not expect you to memorize every detail of the relevant laws, rules, and regulations associated with your employment, we want you to be able to determine when to seek advice from others. If you have a question in the area of legal compliance, it is important that you talk with your supervisor or a corporate officer.

Violation of domestic or foreign laws, rules and regulations may subject an individual, as well as Zenith Aviation, to civil and/or criminal penalties. Be aware that conduct and records, including emails, are subject to internal and external audits, and to discovery by third parties in the event of a government investigation or civil litigation. It is in everyone's best interest to know and comply with our legal and ethical obligations.

## **4. Conduct on Company Business**

Dishonest or illegal activities while on company business will not be condoned and can result in disciplinary action, including dismissal and criminal prosecution. The following illustrates

activities that are against company policy, and which will not be tolerated on company premises, in company vehicles or while engaged in company business:

- Consumption and storage of alcoholic beverages, except where legally licensed or authorized by an officer of the company
- The use of controlled substances, such as drugs or alcohol. The unlawful manufacture, distribution, dispensation, possession, transfer, sale, purchase or use of a controlled substance
- Driving vehicles or operating company equipment while under the influence of alcohol or controlled substances
- Illegal betting or gambling
- Carrying weapons of any sort on company premises, in company vehicles or while on company business. Even employees with permits or licenses cannot carry weapons on company property or while on company business.

The company reserves the right to inspect any property that might be used by employees for the storage of their personal effects. This includes desks, lockers and vehicles owned by the company. It is a violation of company policy to store any contraband, illegal drugs, toxic materials or weapons on company property.

## **5. International Business Laws**

Employees are expected to comply with the applicable laws in all countries to which they travel, in which they operate and where we otherwise do business, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries. The fact that in some countries certain laws are not enforced or that violation of those laws is not subject to public criticism will not be accepted as an excuse for noncompliance. In addition, we expect employees to comply with U.S. laws, rules and regulations governing the conduct of business by its citizens and corporations outside the U.S.

These U.S. laws, rules and regulations, which extend to all our activities outside the U.S., include:

- The Foreign Corrupt Practices Act, which prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatment, and requires the maintenance of accurate books of account, with all company transactions being properly recorded
- U.S. Embargoes, which restrict or, in some cases, prohibit companies, their subsidiaries and their employees from doing business with certain other countries identified on a list that changes, or specific companies or individuals
- Export Controls, which restrict travel to designated countries or prohibit or restrict the export of goods, services and technology to designated countries, denied persons or



denied entities from the U.S., or the re-export of U.S. origin goods from the country of original destination to such designated countries, denied companies or denied entities;

- Anti-boycott Compliance, which prohibits U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott that is fostered or imposed by a foreign country against a country friendly to the U.S. or against any U.S. person

If you have a question as to whether an activity is restricted or prohibited, please seek assistance from your supervisor before taking any action, including giving any verbal assurances.

## **6. Antitrust**

Antitrust laws are designed to protect the competitive process. These laws generally prohibit:

- Agreements, formal or informal, with competitors that harm competition or customers, including price fixing and allocations of customers, territories or contracts
- Agreements, formal or informal, that establish or fix the price at which a customer may resell a product
- The acquisition or maintenance of a monopoly or attempted monopoly through anti-competitive conduct

Certain kinds of information, such as pricing, production and inventory and, particularly with respect to federal government procurement, competitors' bid and proposal information and "source selection information," may not be exchanged with competitors, regardless of how innocent or casual the exchange may be and regardless of the setting, whether business or social. See paragraph 18 for more detail on Government ethics.

We must conduct all interactions with competitors, including social activities, as if they were completely in the public view, because they may later be subject to probing examination and unfavorable interpretation.

Understanding the requirements of antitrust and unfair competition laws of the various jurisdictions where we do business can be difficult, and you are urged to seek assistance from your supervisor whenever you have a question.

## **7. Conflicts of Interest**

A conflict of interest occurs when a person's personal interest may interfere in any way with the performance of his or her duties or the best interests of Zenith Aviation. A conflicting personal interest could result from an expectation of personal gain now or in the future or from a need to satisfy a prior or concurrent personal obligation. Zenith Aviation expects all employees to be free from influences that conflict with the best interests of the organization. Even the appearance of a

conflict of interest where none actually exists can be damaging and should be avoided. Whether a conflict of interest exists or will exist can be unclear. Conflicts of interest are prohibited unless specifically authorized as described below.

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer of Zenith Aviation, please discuss the matter with your supervisor.

Factors that may be considered in evaluating a potential conflict of interest are, among others:

- Whether it may interfere with the employee's job performance, responsibilities or morale
- Whether the employee has access to confidential information
- Whether it may interfere with the job performance, responsibilities or morale of others within the organization
- Any potential adverse or beneficial impact on our business
- Any potential adverse or beneficial impact on our relationships with our customers or suppliers or other service providers
- Whether it would enhance or support a competitor's position
- The extent to which it would result in financial or other benefit (direct or indirect) to the employee
- The extent to which it would result in financial or other benefit (direct or indirect) to one of our customers, suppliers or other service providers
- The extent to which it would appear improper to an outside observer

The following are examples of situations that may, depending on the facts and circumstances, involve conflicts of interests:

- Employment by (including consulting for) a competitor, customer or supplier or other service provider. Activity that enhances or supports the position of a competitor to the detriment of Zenith Aviation is prohibited, including employment by a competitor. Employment by or service on the board of a customer or supplier or other service provider is generally discouraged and you must seek authorization in advance if you plan to take such action.
- Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business or competes with us. In addition to the factors described above, persons evaluating ownership for conflicts of interest will consider the size and nature of the investment; the nature of the relationship between the other entity and Zenith Aviation; the employee's access to confidential information and the employee's ability to influence Zenith Aviation decisions. If you would like to acquire a financial interest of that kind, you must seek approval in advance.

- Soliciting or accepting gifts, favors, loans or preferential treatment from any person or entity that does business or seeks to do business with us
- Soliciting contributions to any charity or for any political candidate from any person or entity that does business or seeks to do business with us
- Taking personal advantage of corporate opportunities

### **8. Corporate Opportunities**

Employees may not take personal advantage of opportunities that are presented to them or discovered by them as a result of their position or through their use of corporate property or information, unless authorized by their supervisor, as described in Paragraph 7, above – “Conflicts of Interest.” Even opportunities that are acquired privately by employees may be questionable if they are related to our existing or proposed lines of business. Employees may not use their position with Zenith Aviation or its corporate property or information for improper personal gain, nor may employees compete with Zenith Aviation in any way.

### **9. Maintenance of Corporate Books, Records, Documents and Accounts**

The integrity of Zenith Aviation records depends on the validity, accuracy and completeness of the information supporting the entries to our books of account. Therefore, corporate and business records should be completed accurately and honestly. The making of false or misleading entries, whether they relate to financial results or test results, is strictly prohibited. Zenith Aviation records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, creditors, employees and others with whom we do business. Our accounting records are also relied upon to produce reports for our management, and creditors. As a result, it is important that our books, records and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities. We require that:

- No entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities, or misclassifies any transactions as to accounts or accounting periods
- Transactions be supported by appropriate documentation
- Employees comply with our system of internal controls
- No cash or other assets may be maintained for any purpose in any unrecorded or "off-the-books" fund

In addition:

No employee may take or authorize any action that would cause our financial records or financial disclosure to fail to comply with generally accepted accounting principles or other applicable laws, rules and regulations; and

All employees must cooperate fully with our accounting and internal auditing departments, as well as our independent public accountants and counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records are accurate and complete.

Any employee who becomes aware of any departure from these standards has a responsibility to report his or her knowledge promptly to a supervisor.

### **10. Fair Dealing**

We strive to outperform our competition fairly and honestly. Advantages over our competitors need to be obtained through superior performance and delivery of our products and services, not through unethical or illegal business practices. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance our interests. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, please talk with your supervisor.

You are expected to deal fairly with Zenith Aviation customers, suppliers, employees and anyone else with whom you have contact in the course of performing your job. No employee may take unfair advantage of anyone through misuse of confidential information, misrepresentation of material facts or any other unfair dealing practice.

Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favors.

### **11. Gifts and Entertainment**

Business entertainment and gifts are meant to create goodwill and sound working relationships and not to gain improper advantage with customers or facilitate approvals from government officials. Unless permission is received from a supervisor, entertainment and gifts may not be offered, provided or accepted by any employee unless consistent with customary business practices and not (a) of greater than nominal or token value, (b) in cash, (c) consisting of travel or lodging, (d) susceptible of being construed as a bribe or kickback or (e) in violation of any laws. These principles apply to our transactions everywhere in the world, even where the practice is widely considered "a way of doing business." Under some statutes, such as the U.S. Foreign Corrupt Practices Act, giving anything of value to a government official to obtain or retain

business or favorable treatment is a criminal act. Talk with your supervisor about any proposed entertainment or gifts if you are uncertain about their appropriateness.

### **12. Protection and Proper Use of Company Asset**

All employees are expected to protect Zenith Aviation assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. Our property, such as office supplies, computer equipment and software, records, customer information, manpower, Zenith Aviation names and trademarks, physical plants and products, are expected to be used only for legitimate business purposes, although incidental personal use may be permitted.

Employees need to be mindful of the fact that we retain the right to access, review, monitor, and disclose any information transmitted, received or stored using our electronic equipment, with or without an employees or third party's knowledge, consent or approval. Any misuse or suspected misuse of our assets needs to be immediately reported to your supervisor.

### **13. Expense Reimbursement**

Expenses actually incurred by an employee in performing company business must be documented on expense reports in accordance with company procedures. In preparing expense reports, employees should review appropriate procedures for the expense report in order to be reimbursed for business expenses.

### **14. Company Credit Card**

Company credit cards are provided to employees for convenience in conducting company business. No personal expenses can be charged on company credit cards except as specifically authorized by company procedures. Any charged personal expenses must be paid promptly by the employee. Company credit cards should not be used to avoid preparing documentation for direct payment to vendors. Where allowed by local law, charges on company credit cards for which a properly approved expense report has not been received at the time of an employee's termination of employment might be deducted from the employee's last paycheck. The company will pursue repayment by the employee of any amounts it has to pay on the employee's behalf.

### **15. Software and Computers**

Computerized information and computer software appear intangible, but they are valuable assets of the company and must be protected from misuse, theft, fraud, loss and unauthorized use or disposal, just as any other company property. Use of corporate-provided desktop computers, laptops, and phones must be customer service or job related. Employees cannot access company records of any kind for their personal use. Misappropriation of computer space, time or software includes, but is not limited to, using a computer to create or run unauthorized jobs, operating a

computer in an unauthorized mode or intentionally causing any kind of operational failure. Personal computers can be used for company-sanctioned education programs as well as personal use incidental to company business use with the permission of your supervisor. However, personal use cannot be allowed for personal financial gain. It is also understood that personal computers will occasionally be used at home with the permission of your supervisor.

### **16. Political Contributions**

Federal law and many state laws prohibit contributions by corporations to political parties or candidates. The term “political contributions” includes, in addition to direct cash contributions, the donation of property or services, and the purchases of tickets to fundraising events. Employees can make direct contributions of their own money, but such contributions are not reimbursable. In addition, employees can make contributions to a company-sponsored Political Action Committee. Where corporate political contributions are legal in connection with state, local or foreign elections, such contribution shall be made only from funds allocated for that purpose, and with the written approval of the president of the company making the contribution. The amounts of contributions made shall be subject to inter-company allocation. It is improper for an employee to use his position within the company to solicit political contributions from another employee for the purpose of supporting a political candidate or influencing legislation. It is also improper for an employee to make a political contribution in the name of the company.

### **17. Confidentiality**

Among Zenith Aviation most important assets are its trade secrets and other confidential business information. Employees who have received or have access to trade secrets or other private or confidential information belonging to Zenith Aviation or any third party must maintain the confidentiality of that information. Such confidential information may include business, marketing and service plans, financial information, databases, configuration of our computer systems, customer lists, pricing strategies, marketing materials, personnel data, personally identifiable information pertaining to our employees (e.g., salary, bonus or performance-review data), customers or other individuals (including, for example, names, addresses, telephone numbers and social security numbers), and similar types of information provided to us by our customers, suppliers and partners. This information may be protected by patent, trademark, copyright, and trade secret laws.

Except when disclosure is authorized or legally mandated, you may not share Zenith Aviation or Zenith Aviation customers' or suppliers' confidential information with third parties or others within Zenith Aviation who do not have a legitimate business purpose for receiving that information. Unauthorized use or distribution of this information could also be illegal and result in civil liability and/or criminal penalties.

Employees also need to take care to not inadvertently disclose trade secret, private, or other confidential information. Materials that contain confidential information, such as memos, notebooks, computer disks and laptop computers need to be stored securely. Be cautious when discussing sensitive information in public places like elevators, airports, restaurants and "quasi-public" areas within Zenith Aviation, such as break rooms. All Zenith Aviation emails, voicemails and other communications are considered proprietary and may not be forwarded or otherwise disseminated outside of Zenith Aviation, except where required for legitimate business purposes.

### **18. Federal Government Procurement Integrity**

This policy applies to ALL federal government procurements in which Zenith Aviation is a competitor, regardless of whether Zenith Aviation is competing as a prime contractor, as a member of a joint venture or as a subcontractor. It also applies to the modification and extension of existing federal government contracts and subcontracts. Zenith Aviation employees may not, directly or indirectly:

- Make an offer or promise of future employment or business opportunity, or engage in discussions concerning future employment or business opportunities, with a procurement official
- Offer, give or promise to a procurement official any money, gratuity or other thing of value
- Solicit or obtain, prior to contract award, any proprietary or source selection information from any officer or employee of the subject agency
- Disclose proprietary or source selection information to any person other than an individual authorized by the contracting officer to receive such information

No discussions of any nature whatsoever concerning future employment or business arrangements (including consulting agreements) should be held between Zenith Aviation employees and any government employee, government contract employee or government consultant substantially involved in a federal procurement in which Zenith Aviation is interested, either as a prime, a joint venture member or a subcontractor. This prohibition begins at the inception of any procurement activities for a procurement in which Zenith Aviation is reasonably likely to be a competitor, e.g. issuance of a request for information, or other activities undertaken in preparation for the conduct of procurement and continues through award of the contract. The prohibition applies to all government employees who are involved in the procurement, and would include the contracting officer, the contracting specialist, any technical representatives, all members of any evaluating or source selection panels, the procuring authority, all persons involved in drafting the specifications or other solicitation provisions, and all subordinate persons acting at the direction of any of the persons named above. The Executive Vice President/General Manager should be contacted regarding applicability of this provision prior to talking with the government employees involved.

No gifts, gratuities or other things of value may be given to any government employee who is involved in a procurement in which Zenith Aviation is interested, either as a prime, a joint venture member, or a subcontractor. The time period and persons to whom it is applicable are the same as described in the preceding section on employment discussions. Prohibited gifts and gratuities can include minor items such as lunches, drinks, special discounts on items for the government employee's personal use or any other item of value. Generally there is an exemption for unsolicited items, other than money, having a market value of \$20 or less per gift, with a \$50 annual aggregate maximum for the Company. If there is any doubt as to whether an item qualifies as a gift, gratuity or other item of value, contact the Executive Vice President/General Manager prior to giving such an item to a government employee.

Zenith Aviation employees should not, during the procurement process, solicit or obtain any proprietary or source selection information from any government employee.

“Proprietary” information includes the following:

- Information contained in a bid or proposal of an offeror, other than Zenith Aviation
- Cost or pricing data of an offeror other than Zenith Aviation
- Any other information submitted to the government and designated as proprietary by an offeror other than Zenith Aviation

Source selection information includes all information (1) the disclosure of which would jeopardize the integrity of the procurement, and (2) which is required to be stored in such a manner to prevent disclosure. The following are examples of source selection information:

- Listings of offers and prices
- Listings of bidders and/or prices prior to opening
- Source selection plans
- Technical evaluation plans
- Technical evaluations of competing proposals
- Cost or price evaluations of proposals
- Competitive range determinations
- Rankings
- Source selection board reports and evaluations
- Other information marked as source selection information

Disclosure of Proprietary/Source Selection Information Proprietary and source selection information which comes, by any means, into Zenith Aviation's possession may not be disclosed to individuals not authorized to receive such information. In other words, if an employee receives information which constitutes proprietary or source selection information, the employee cannot



disclose that information to others, even if the source of the information is someone other than a government employee. If proprietary or source selection information comes into an employee's possession, such fact should be reported immediately to the employee's supervisor as well as to the Executive Vice President/General Manager, and such information provided to the contracting officer.

If Zenith Aviation submits information to the Government that Zenith Aviation wants to protect from disclosure, then the information must be marked as proprietary. The cover page of the bid or proposal and each page that contains proprietary information must be marked as proprietary. The Executive Vice President/General Manager should be consulted if there is any question as to whether information is appropriately marked as proprietary.

### **19. Environmental Policy**

Zenith Aviation is committed to protecting human health and the environment. This commitment requires that our company integrate employee health and safety and environmental consideration into all aspects of our facilities, operations and processes. It further requires that we operate in a manner that is environmentally responsible and that ensures the protection of the health and safety of our employees and the public. We make every effort to recognize and respond to community and employee concerns about these issues. Employees are responsible for conducting their work activities in a safe and environmentally responsible manner and for bringing to their supervisor's attention any actual or potentially dangerous condition. Particular attention should be paid to the disposal of waste materials, erosion control and discharges into the air, soil or water. Federal, state and local environmental laws and regulations govern these matters and it is essential that each employee become familiar with those laws and regulations as they relate to your work and that care is taken to assure that the laws and regulations are followed.

### **20. Media/Public Discussions**

The Executive Vice President/General Manager for Zenith Aviation is its designated contact for media inquiries. All inquiries or calls to Zenith Aviation from the press should be referred to Angela Shawaryn, (540) 361-7700 – EXT 206, or ashawaryn@zenithaviation.com.

### **21. Waivers**

Any waiver of this Code for officers may be authorized only by the President/CEO or Executive Vice President/General Manager.

### **22. Your Responsibility**

It is the responsibility of all Zenith Aviation employees to read and comply with the Business Standards and Ethics Manual, to seek advice and guidance when questions arise and to report

violations of the Zenith Aviation Business Standards and Ethics Manual of which they have knowledge. Employees are encouraged to raise such issues with their supervisor first. In the event that is not possible they can contact the Executive Vice President/General Manager. The company will treat such reports as confidential as possible. You may make an anonymous report if you desire. In any case, company policy prohibits direct or indirect retaliation on anyone reporting any violation.

All Zenith Aviation employees are required to cooperate in internal investigations to any alleged violation of company policies. No employee is permitted to destroy or alter documents, or electronic records, lie, or mislead an investigator (internal or external). No employee is permitted to obstruct the collection of information relating to an investigation or any legal action. If requested by Zenith Aviation, employees are also required to cooperate with investigations conducted by the government. Employees are required to notify management immediately if one learns that a government agency or any third party is conducting such an investigation or asking for information pertaining to a suspected violation of law. The Executive Vice President/General Manager will help employees review information before it is released to the investigative organization.

### **23. Questions and Reporting**

It is Zenith Aviation's top priority and every employee's obligation to uphold the policies in this manual. If you have any questions regarding the policies contained in this booklet, please contact the Executive Vice President/General Manager. Zenith Aviation's employees must report any incidents of unlawful or unethical conduct, conflicts of interest, unsafe conditions, lack of proper security for information or property, or other conduct inconsistent with Zenith Aviation's policy. Reporting suspected violations of the Zenith Aviation's Ethics policy will not adversely affect your employment at Zenith Aviation's (i.e. employees will not be demoted, suspended, or terminated for reporting a violation).

In order to foster a comfortable reporting environment, you may report any violation or suspected violation directly in person or anonymously using any of the following reporting avenues

- Your supervisor
- All levels of management
- Human Resources

If the investigation indicates that a violation of the Code has occurred, Zenith Aviation's management will take action that we believe appropriate. If we determine that an employee is responsible for a Code violation, he or she will be subject to disciplinary action up to, and including termination of employment and, in appropriate cases, civil action or referral for criminal prosecution. Appropriate action may also be taken to deter any future Code violations.