

COMPANY POLICY: Flightcell Ethics Policy

POLICY NUMBER:	300-00006
POLICY AIM:	<i>To provide guidelines and establish procedures for ethical conduct by all directors, employees, contractors, suppliers, resellers and distributors</i>
REVISION NO:	1.0
EFFECTIVE DATE:	10 June 2026
APPROVED BY:	Directors – CW, HN, JW
APPLIES TO:	All directors, employees, contractors and suppliers

OBJECTIVES

Business Vision

Flightcell International Limited (FIL) is committed to being a leading global aviation communications organisation driven by quality, safety, integrity, product leadership and customer service excellence, connecting industry with market leading intuitive products and services.

In upholding FIL's vision, it is expected that all employees behave ethically to promote a company culture that upholds responsibility, fairness and good conduct in all that we do. FIL extends the requirement for ethical behaviour to all suppliers, sub-tiers, resellers and distributors that we work with.

REQUIREMENTS & GUIDELINES

Compliance with Regulations and Laws

FIL operates in accordance with all relevant local, national and international regulations and laws including prohibitions on corruption, modern slavery and child labour. FIL requires all our suppliers, sub-tiers, resellers and distributors to comply with all applicable local, national and international regulations and law.

Conflicts of Interest

FIL wishes to ensure that any employees acting on behalf of the Employer behave in an impartial and transparent manner. As such, it is vital that FIL manages conflicts of interest. A conflict of interest does not necessarily mean that the employee has acted improperly, and the conflict may be actual, potential or perceived. Any actual, potential or perceived conflicts of interest must be disclosed including relevant personal or financial interests that could impact FIL.

Personal and Proprietary Information

Privacy is extremely important to FIL. It is committed to ensuring that personal information and proprietary information is protected and only used appropriately and in accordance with any applicable legislation. Where appropriate we may also seek further or specific consent relative to personal information held.

Anti-bribery and Anti-corruption

FIL does not tolerate the offering or accepting of bribes or any form of corruption.

Non-Retaliation

Employees are encouraged to report suspected illegal, unsafe, unethical behaviour or violations by other employees, the employer or suppliers, resellers and distributors. Reports can be made confidentially to your manager or the appropriate organisation or body. You will not suffer any detriment because of any good faith attempt to bring to light matters of concern. All concerns will be investigated promptly as per the Flightcell International Limited Employee Handbook.

Enforcement

Violations of this policy may result in disciplinary action, up to and including termination or legal consequences.

Monitoring of Objectives

This policy will be reviewed periodically to ensure alignment with AS9100 requirements and FIL's objectives.

POLICY QUESTIONS & FEEDBACK

Any questions or feedback relating to this policy should be directed to your manager.