



# GLOBAL AIRWAYS SUPPLIER CODE OF CONDUCT

Issue 1: Revision 0



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# Message to our suppliers

At Global Airways, we are committed to doing business ethically, transparently and with integrity.

As a vertically integrated organisation, we have embedded a shared understanding of and commitment to the behaviours expected from ourselves and each other. That understanding and commitment extends to our suppliers, who play a critical role in helping us maintain our standards of integrity and sustainability.



This is our 'Supplier Code of Conduct', which sets out the key principals of conduct and workplace standards we expect from all suppliers working with us. Our 'Supplier Code of Conduct' compliments our internal Code of Conduct, which outlines the standards and behaviours expected of all of us at Global Airways.

Our goal is to maintain relationships with all our partners based on honesty, fairness, and integrity. We appreciate that your organisation may have its own code of conduct. Our intention is not for this to replace your current code. Instead, we would ask that you review our 'Supplier Code of Conduct' to help your understanding of the expectations we have of our suppliers so we can work together to achieve our goals.

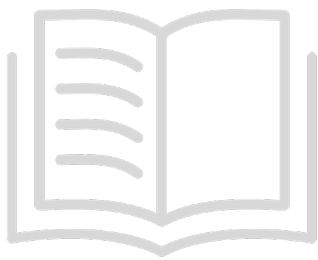
If you have any questions, please contact our Supplier Performance Management Team at ([globalcomms@g-airways.com](mailto:globalcomms@g-airways.com)).

Thank you for your support.

Regards,

# Introduction

Global Airways wishes to conduct business and build relationships with suppliers who share our values. This Supplier Code of Conduct is based on our Global Airways Code of Conduct, which sets out the principles we must all work by every day at Global Airways, wherever we



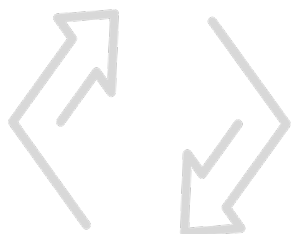
## Code Applicability

The Code is applicable to all suppliers and partners who supply products or services related to contracts or purchase orders with Global Airways and its associated companies.

It is our expectation that our suppliers will adhere and comply with the principles set out in this document. Failure to carry out work in accordance with this Supplier Code of Conduct could have damaging consequences for both the supplier and our business.

Global Airways reserves the right to audit against compliance to this Supplier Code of Conduct. Suppliers are expected to make available documentation demonstrating compliance with this Code if requested. Global Airways reserves the right to terminate contracts in the event of material breach of the principles set out in this Supplier Code of Conduct.

The Global Airways Supplier Code of Conduct is freely available to view and can be downloaded from [www.g-airways.com](http://www.g-airways.com)



## Communicating this Code

Global Airways suppliers are expected to assist Global Airways in enforcing this Supplier Code of Conduct by communicating it to any of its staff, sub-suppliers or other third parties engaged in the provision of goods or services to Global Airways and its associated companies.

# Our Principles

## 1. People & Workplace

### Health, Safety & Security

Health, safety and security is fundamental to our business, whether in the air or on the ground. It is our highest priority. We expect our suppliers to work and operate in compliance with all applicable health, safety and security laws, regulations, and industry standards.

### Fairness & Respect

Safe and ethical behaviour depends on all of us as individuals and, fundamental to that, is how we treat each other. Global Airways and its suppliers must treat each other with dignity and respect, and we should never engage in bullying or harassment.

Global Airways and its suppliers must ensure that workers are treated fairly and not unlawfully discriminated against.

We expect our suppliers to promote and provide work environments free from abuse, intimidation, and harassment and that allow people to raise concerns freely and without fear of retaliation.

### Employment Practices

Global Airways suppliers must comply with applicable wage and hour labour laws and regulations governing employee compensation and working hours.

Global Airways suppliers must not employ workers under the minimum legal age of employment in the jurisdiction where work is performed on behalf of Global Airways. Irrespective of the legal minimum age, suppliers shall ensure that all legal requirements including type of work, remuneration, working conditions and education requirements are met.



## 2. Customers & Stakeholders

### Our Customers

Global Airways is a customer service business. We aim to provide good value and service to our customers and to look after them, or their cargo, properly in many different circumstances. Together with our suppliers, we must treat our customers with fairness, care, respect and dignity, and in a professional and non-discriminatory way.

### Environment

Global Airways is committed to reducing its CO2 emissions in line with local and international goals, with additional interim targets along our journey. We measure and mitigate our impact on the environment, both on the ground and in the air, while responding to the demand for passenger and cargo air transport in the 21st century.

We expect our suppliers to adopt procedures and practices to minimise their impact on the environment, and to work collaboratively with Global Airways to help meet our environmental sustainability goals particularly in relation to climate, waste and noise.

### Political Engagement

We do not allow the use of Global Airways company funds or resources, including any Global Airways company brands, to support any political party or candidate.



### 3. Business Dealings

#### Compliance with Laws

When providing goods or rendering a service to Global Airways, suppliers must act in compliance with the applicable laws, rules, and regulations of the countries in which they operate on behalf of Global Airways and its operating companies.

#### Competing Fairly

Suppliers are expected to conduct their business in an open and honest manner and must carry out their business for Global Airways in compliance with competition laws.

#### Anti-Bribery

In their work for, or on behalf of Global Airways, suppliers must never offer, pay, request or accept anything of value to obtain an improper advantage, or improperly influence any kind of decision or action, whether directly or through a third party.

#### Gifts, Hospitality & Entertainment

1. Global Airways suppliers are not expected to offer any gifts, hospitality or entertainment to any employee or representative of Global Airways or its operating companies.
2. Global Airways suppliers must not provide any gifts, hospitality or entertainment to employees or representatives of Global Airways or its operating companies during a competitive tender.
3. Any gifts, hospitality or entertainment offered by a Global Airways supplier on behalf of Global Airways, or its operating companies must be approved by Global Airways in advance.



## Avoiding Conflicts of Interest

Global Airways suppliers must avoid situations where personal interests, such as family or financial interests, conflict with those of Global Airways or its operating companies (or may be perceived as such). If you encounter an actual, potential, or perceived conflict of interest, suppliers must report it to their contact at Global Airways or Global Airways associated company to ensure it is managed appropriately.

## Securities Laws Compliance

Global Airways suppliers must comply with securities laws and never engage in any insider dealing in relation to Global Airways.

## Tax Compliance

We expect Global Airways suppliers to comply with their tax obligations in the countries in which they operate. Global Airways suppliers must never facilitate the tax evasion of others of behalf of Global Airways.



## Trade Compliance

Global Airways suppliers must abide by all relevant international trade laws, including export control, sanctions and customs laws when providing services to Global Airways.

## Respecting Human Rights

We expect Global Airways suppliers to carry out work in a manner that respects the human rights of others. This means not accepting any form of forced, involuntary or child labour, human trafficking, and modern slavery anywhere in their business or supply chains.



## 4. Information & Assets

### Company Information & Assets

Global Airways information, assets, equipment, and supplies should only be used in the manner they are meant to be used and in compliance with relevant policies and procedures.

### Personal Data

Global Airways is firmly committed to protecting all personal data that we process in the course of our business. Global Airways suppliers must protect any personal data they collect or manage on behalf of Global Airways in accordance with obligations under applicable data protection laws.

### Accurate Records

Global Airways suppliers must maintain accurate, complete, and truthful company books, records, accounts, and communications in relation to the goods and services they provide to Global Airways.



### Public Statements

Anyone from a supplier organisation making public comments on behalf of Global Airways or its associated companies, such as press comments or statements on social media, should only do so with appropriate approvals and in a manner that is accurate and appropriate.

**DISCLAIMER** This document has been prepared by Global Airways and remains the property of the author. The information contained herein is private and confidential; distribution is by consent only to authorized recipients. The information as set out herein is valid at the time of writing (June 2021) and may be subject to change.

# Reporting a concern

We all have responsibility to speak up if we see or suspect a breach of this Supplier Code. Everyone is expected to raise a concern when they become aware of a situation in which the standards and behaviours in this Supplier Code are not being followed.

There are several ways you can report a concern. The first option is to speak with your contact at global Airways or a Global associated company, however if this is not possible, Global Airways maintains confidential reporting lines where individuals can raise an issue, anonymously if required.

## Your Voice Matters. Speak Up.



Speak to your contact at Global Airways



Send us an email to [globalcomms@g-airways.com](mailto:globalcomms@g-airways.com)

Anyone who raises or reports a concern in good faith will be protected against any detrimental treatment. We do not tolerate bullying, victimising, harassing or any other type of retaliation against anyone who raises a concern.

Concerns that are raised in bad faith, maliciously, for personal gain or where they are known to be untrue are not tolerated.

We encourage suppliers to provide a similar anonymous service for raising concerns where it is allowed by law.