

## CODE OF CONDUCT & ETHICS POLICY

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### MISSION

We believe in **air freight** industry where everyone has the unique opportunity to develop new **green capabilities** in an atmosphere of cooperation and mutual support.

We solve the most difficult air freight issues and challenges from 1 kg transportation to 100t charter flight and GSA global sales **worldwide**.

We **create green conditions** for the development and support of our partners, feel their headaches and generate the solutions to improve their business models and profitability.

### 1. PURPOSE

**Air Cargo Green Capabilities Sarl** is a young, fast-developing company providing different kind of services for air cargo operations and consulting for air freight transportation from Europe to China, USA and the Middle East.

The correlations with our suppliers, customers and partners are one of fundamental tools and keys to success and building of long-term sustainable cooperation. We are committed to ensure that our business relationships meet to relevant laws, regulations, and ethical standards as well as new initiative of environmental responsibility, culture integrity and sustainability.

The Code of Conduct and Ethics Policy of **Air Cargo Green Capabilities Sarl (ACGC Sarl)** outlines the principles, values, and standards of behavior expected from all employees, contractors, vendors, and authorized users while representing the organization. This Policy serves as a guide to ensure ethical conduct, integrity, and compliance with the highest standards of business ethics.

The Company's Code of Conduct and Ethics Policy is posted on the Company's website, at <http://www.aircgc.com>.

### 2. SCOPE

The purpose of this Policy is to:

- Promote a culture of honesty, integrity, and transparency within **ACGC Sarl**
- Establish clear expectations for ethical behavior in all business activities.
- Ensure compliance with applicable laws, regulations, and industry standards.
- Safeguard the reputation and interests of **ACGC Sarl**, its stakeholders, and the broader community.

### 3. CORE VALUES

At **ACGC Sarl**, we are guided by the following core **Values**:

- **People's business:** In people's integrity we trust.
- **Openness:** We conduct ourselves with honesty, sincerity, and consistency in all interactions and transactions.
- **Health:** We support healthy and sport initiatives. We believe that it builds up new energy for the business and people involved.
- **Cooperation:** We work together towards our common goal with patience and affection.
- **Diversity:** We treat all individuals with dignity, respect diversity, and value the opinions and perspectives of others.
- **Labor:** We believe that Labor provides the individual with the ability to be independent, to flourish, to develop and find a meaning to life.
- **Knowledge:** We take responsibility for our actions, decisions, and their consequences.
- **Transparency:** We provide accurate, complete, and clear information to stakeholders, both internally and externally.
- **Development:** We strive for excellence in our work, continually improving our skills and processes.
- **Integrity:** We conduct ourselves with honesty, sincerity, and consistency in all interactions and transactions.

### 4. POLICY STATEMENTS

#### Conflicts of Interest

- Employees must avoid situations where their personal interests conflict with the interests of **ACGC Sarl**. Any actual or potential conflicts of interest must be disclosed promptly to the appropriate personnel.

#### Confidentiality

- Employees must maintain the confidentiality of **ACGC Sarl's** sensitive information, as well as the personal and proprietary information of colleagues, customers, and partners. Confidential information should only be shared with authorized individuals or as required by law.

#### Compliance with Laws and Regulations

- Employees must adhere to all applicable laws, regulations, and industry standards. Ignorance of the law is not an excuse for non-compliance.

### **Ethical Decision-Making**

- Employees are expected to make ethical decisions, considering the best interests of **ACGC Sarl**, its stakeholders, and the broader community. When faced with ethical dilemmas, employees should seek guidance from appropriate channels.

### **Non-Discrimination and Harassment**

- **ACGC Sarl** is committed to maintaining a workplace free from discrimination and harassment based on race, gender, age, religion, disability, or any other protected category. Such behavior will not be tolerated.

### **Use of Company Resources**

- Employees should use company resources, including time, property, and equipment, responsibly and for business purposes. Unauthorized use of company resources for personal gain is prohibited.

### **Reporting Violations**

- **ACGC Sarl** encourages employees to report any suspected violations of this Code of Conduct and Ethics Policy through established channels, such as supervisors, managers, or the HR Department. Reports can be made confidentially, and retaliation against whistleblowers is strictly prohibited.

## **5. RESPONSIBILITIES**

- **Employees:** Responsible for familiarizing themselves with this Policy, adhering to its principles, and reporting violations or concerns.
- **Supervisors and Managers:** Responsible for promoting ethical behavior within their teams, addressing ethical concerns promptly, and serving as role models of ethical conduct.
- **HR Department:** Responsible for disseminating, interpreting, and enforcing this Policy, as well as conducting ethics training and awareness programs.

## **6. COMPLIANCE AND CONSEQUENCES**

Failure to comply with this Code of Conduct and Ethics Policy may result in disciplinary actions, up to and including termination of employment, in accordance with **ACGC Sarl's** policies and procedures.

## 7. POLICY REVIEW

This Code of Conduct and Ethics Policy will be reviewed annually or more frequently if necessary. Updates or changes to the Policy will be communicated to all relevant personnel to ensure continued adherence to ethical guidelines.

**Air Cargo Green Capabilities Sarl / Luxembourg / 01.05.2024**

