

Unical Aviation Inc. (Unical) is an aerospace company that provides maintenance, repair, and overhaul of aircraft parts. Unical is the trusted supplier of used serviceable material for the global aerospace industry by purchasing used and after-market aircraft parts to resell to our customers. Although Unical is not a manufacturer, we purchase and sell to entities all over the world with the exception of Russia, Cuba, Iran, North Korea, Syria, Iraq, Belarus, and the Crimea region of the Ukraine as defined in the 15 CFR 746. All inventory we purchase or sell is traceable to airlines or FAA/EASA approved manufacturers as a source and traceable through documentation. Given this traceability from globally reputable airlines and FAA/EASA approved manufacturers subjected to external governmental oversight, who usually also operate under their own codes of ethical conduct similar to Unical's (outlined below), the threat of child or forced labor within Unical's supply chain is effectively zero.

Nevertheless, to ensure that Unical's supply chain is free from any child or forced labor, Unical requires adherence to the following requirements from all of its suppliers. In addition, Unical imposes the same ethical conduct upon its organizational members and employees; and ensures compliance with these ethical standards through its internal employment policies and ongoing monitoring and training of its staff.

#### Unical's Ethics Requirements

A. All Sellers to Unical Aviation are expected to conduct their affairs in accordance with the following principles:

1. Obedience to the law,
2. Always acting in good faith,
3. Maintaining an egalitarian workplace built on trust, mutual respect, integrity, and diversity,
4. Communicating openly, respectfully, and effectively, and
5. Constant consideration of the impact of our decisions on our stakeholders, both up and down the supply chain.
6. Sellers must ensure consistency with Unical's values and principles throughout their operations and supply chains, adhering to laws that prohibit slavery and related practices. The use of forced labor, including prison, indentured, bonded labor, and modern slavery, is strictly prohibited.
7. Child labor is forbidden, and Sellers must comply with relevant laws, employing workers meeting the minimum legal age requirements.
8. Sellers are obligated to comply with wage and hour regulations in their respective places of operation.
9. Applicable occupational health and safety standards must be met in facilities and operations.

B. As an international organization, Unical Aviation recognizes that inherent differences with regards to law, politics, economics and culture exists within each country we chose to

conduct business with. We are committed to conduct our affairs in each country fairly and humanely. We expect this from all our suppliers as well.

C. All Sellers to Unical are prohibited from engaging in corrupt practices such as bribery, extortion, espionage, fraud, and theft.

#### Additional Awareness Requirements

- A. Sellers shall ensure that their employees are aware of:
- a. Their contribution to product or service conformity,
  - b. Their contribution to product safety, and
  - c. Their contribution to the importance of ethical behavior.

These requirements are provided to all sellers within Unical's supply chain at the time of placing Purchase Orders. Acceptance of any Unical Purchase Order by a seller constitutes acceptance of and a promise to adhere to the terms and conditions thus mentioned.

I, David Vollrath, approve this report under paragraph (4)(a) of Bill S-211.



David L. Vollrath II

Chief Operating Officer

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Unical Aviation Inc.

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