



KALITTA AIR Anti-Corruption/Bribery Policy and Code of Business Ethics and Conduct

Kalitta Air is fully committed to the highest standards of behavior and integrity and complies with all laws and regulations governing its operations regardless of its location. Kalitta Air has implemented comprehensive Anti-Corruption Policy and Code of Business Ethics and expects all its employees, agents, service providers and anyone else doing business on behalf of Kalitta Air, to strictly follow any applicable Anti-Corruption and Business Ethics laws and the enclosed Kalitta Air Anti-Corruption Policy and Code of Business Ethics.

Anti-Bribery

Definition

In plain language bribery means: paying money, promising to pay money, authorizing to pay money, or offering or promising anything of value to a person in a position of trust in order to unduly influence the judgment or conduct of that person.

In legal terms bribery means to offer, promise or give, whether directly or through intermediaries, any undue pecuniary or other advantage to a public official, political candidate, party, party official, a private sector employee or individual (each a "recipient"), for that recipient or for a third party, (i) in order that the recipient acts or refrains from acting in relation to the performance of official or fiduciary duties, (ii) in order to obtain or retain business or other improper advantage in the conduct of business.

Policy

Kalitta Air, its employees, agents, subcontractors, suppliers, and service providers acting on behalf of Kalitta Air do not engage in the bribery of any public official, political candidate, party, party official, private sector employee or individual. Furthermore, Kalitta Air, its employees, agents, subcontractors, suppliers, and service providers acting on behalf of Kalitta Air also prohibit their employees to accept bribes.

Kalitta Air, its employees, agents, subcontractors, suppliers, and service providers acting on behalf of Kalitta Air shall (i) comply with all applicable country laws relating to anti-corruption or anti-bribery, including but not limited to legislation implementing the Organization for Economic Co-operation and Development "Convention on Combating Bribery of Foreign Public Officials in International Business Transactions" (the "OECD Convention") or other anti-corruption/anti-bribery convention; (ii) comply with the requirements of the Foreign Corrupt Practices Act, as amended, (FCPA) (15 U.S.C. §§78dd-1, *et. seq.*), regardless of whether Kalitta Air is within the jurisdiction of the United States; and (iii) neither directly nor



indirectly, pay, offer, give, or promise to pay or give, any money or anything of value, to a non-U.S. public official or any person in violation of the FCPA and/or the International Bribery Act of 1998.

In addition, Kalitta Air and Kalitta Air's service providers do not use third parties (i.e. agents, subcontractors and intermediaries) to channel payments to any person or persons, including public officials, on their behalf.

Facilitation Payments

Definition

A facilitation payment is a small payment to a public official with the purpose of securing or expediting the performance of a routine governmental, non-discretionary action to which the payer is legally entitled.

Examples for routine governmental actions are:

- Obtaining permits, licenses, or other official documents to qualify a person to do business in a foreign country
- Processing governmental papers, such as visas and work orders
- Providing police protection, mail pickup and delivery
- Scheduling inspections associated with contract performance or inspections related to transit of goods across country or inspections related to customs clearance
- Secure customs clearance procedure
- Providing phone services, power and water supply, loading and unloading cargo

Policy

Kalitta Air and service providers acting on behalf of Kalitta Air direct all their employees not to make any facilitation payments, even in countries where facilitation payments are not prohibited by law and are local business practice. Kalitta Air and service providers acting on behalf of Kalitta Air will use their best efforts to fully eliminate facilitation payments in their business operations worldwide.

In addition Kalitta Air and Kalitta Air's services providers do not use third parties (i.e. agents, subcontractors and intermediaries) to make facilitation payments on their behalf.

Gifts, Hospitality, Entertainment

Definition

Gifts are benefits given to an institution or an individual, in either the public or the private sector without the intent of achieving a business advantage in return other than goodwill and reputational benefits. Example: office trinkets.

Hospitality and entertainment include occasional invitations to ordinary sports, theatre or other cultural events as well as invitations to modest meals / refreshments or customer events.

Expenses encompass the reimbursement of travel and accommodation expenses to third parties or Kalitta Air employees for visiting company sites or for other business-related travel.

Policy

Kalitta Air allows the offering and the receiving of gifts, hospitality, entertainment and expenses if they are:

- in line with relevant laws and acceptable according to local culture;
- offered/promised/given or received openly and unconditionally;
- given without the intention of obtaining or retaining any direct business advantage;
- of reasonable/modest value, i.e. insignificant compared with local average salaries;
- given or received on an infrequent basis (not exceeding 2 times per year);
- in good taste, i.e. not offending the sensibilities of others in relation to disability, gender, culture, nationality, etc.;
- properly recorded and documented.

Any gift, hospitality, entertainment or expense that does not meet all of the above criteria is prohibited, as it may be used as a subterfuge to bribery.

Political Contributions

Definition

A political contribution (also referred to as political donation) is usually defined as a contribution made to a politician or a political campaign or a political party. This includes payments made directly or indirectly (i.e. through an acquaintance or any other intermediary), and contributions in cash or in-kind.

Policy

Kalitta Air prohibits political contributions in any form made by or on behalf of the company. Personal contributions by Kalitta Air employees or by Kalitta Air's service providers may be made if they are not made with the intention or result of directly or indirectly benefiting Kalitta Air and if no Kalitta Air funds are involved.

In addition, Kalitta Air and Kalitta Air's service providers do not use third parties (i.e. agents, subcontractors and intermediaries) to make political contributions on their behalf.