

Avion Graphics' Pledge to Ethical Business Conduct

Avion Graphics pledges to conduct business in an integrous and ethical manner towards our customers, suppliers, competitors, employees, and all other stakeholders and interested parties.

Implementation

Avion Graphics pledges to uphold and enforce these principles internally by implementing them in the following ways:

- Promoting awareness and compliance from our employees which is consistent with our ethics policy through appropriate employee communication.
- Encouraging all our employees, supervisors and managers to report any ethical concerns that they may have regarding compliance with the principles adopted by Avion Graphics without fear of retaliation.
- Applying appropriate, proportionate and dissuasive sanctions for evidenced cases of non-compliance.

Zero Tolerance for Corruption

- Avion Graphics will comply fully with all anti-bribery laws applicable to the conduct of our business, such as the U.S. Foreign Corrupt Practices Act (FCPA) and those laws enacted pursuant to International Conventions (including, but not limited to, the 1997 OECD Convention and the 2003 United Nations Convention Against Corruption (UNCAC)).
- Avion Graphics will not offer, promise, or provide any undue financial or other advantage (e.g. payments, gifts, hospitality, as well as political contributions or charitable donations), to public officials, political parties or political candidates, or to any private party, in order to obtain or retain business or gain any other advantage in the conduct of our business (hereafter referred to as *Improper Advantage*).
- Avion Graphics shall enforce these principles internally and have communicated these principles to our employees outlining the prohibition of any Avion Graphics employee, supervisor or manager from offering, promising or providing, directly or indirectly, any *Improper Advantage* and will conduct informal training on these principles.
- Avion Graphics has made our business partners (i.e. subcontractors and suppliers) aware of the ethics principles of our company, and their responsibility to refrain from offering, promising or providing, directly or indirectly, any *Improper Advantage* to any Avion Graphics employees.

Use of Consultants or Other External Agents

Any advisors, agents, consultants and/or external marketing entities employed by Avion Graphics who assist in developing, expanding or maintaining Avion Graphics' business shall be made aware of the Avion Graphics policy on integrity and ethical business practices.

Managing Conflicts of Interest

Avion Graphics shall follow all applicable laws, regulations and directives concerning the employment or engagement of public officials including those dealing with conflicts of interest.

Respect for Proprietary Information

Avion Graphics shall keep all third-party proprietary information confidential and in accordance with the terms of its disclosure and in strict compliance with all applicable laws and regulations.

Avion Graphics will not solicit or accept a third party's proprietary information (whether provided by a customer or otherwise) unless the owner of the data has agreed to its release. If Avion Graphics receives a third-party's proprietary information without authorization, we:

- shall promptly cease dissemination and review of such information;
- shall promptly destroy or return such information; and
- shall inform the third-party of the incident and their response.

The above *Principles of Business Ethics Pledge* was officially adopted and implemented on July 1, 2018.



Craig Greiner, President/CEO



Michele Morris, Executive Vice President