



Code of Conduct



A Message from Alan

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A Message from Alan



Alan Crawford
Chief Executive Officer

**We are a company built on values.
Let’s make sure we live them.”**



Why This Code Exists

This Code of Conduct sets the expectations for how we behave.

Whether that is in the office, with our customers, in the field, online, and everywhere in between. It applies to every Acron Aviation colleague, business partner, contractor, consultant, supplier, and third party acting on our behalf.

If you’re ever unsure about what to do, ask yourself:

- > Is this legal?
- > Is this aligned with our values?
- > Would I be okay if this was published online tomorrow? If you’re still uncertain, ask for help.

This Code is grounded in our Founder's Mentality culture of empowerment and accountability. Everyone at Acron Aviation is trusted to make decisions, take ownership, and act like a founder.

You are empowered to act, and you are accountable for those actions.



Our Values How We Work

At Acron Aviation, our values aren’t just words they’re the behaviors we expect from ourselves and each other every day.

These values drive our performance, shape our culture, and help us build trust with customers, colleagues, and communities.

Here’s what each value means, why it matters, and how we expect you to live it.



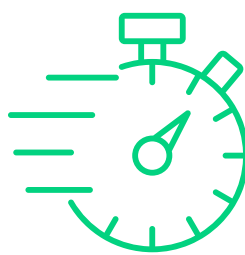
1

Customer First

We believe the customer is at the center of everything we do.

- > Think of the customer first in every decision.
- > Answer every query within 24 hours don’t hide behind email.
- > Use the phone or video when needed connect like a human.
- > Be realistic with commitments, and then overdeliver.
- > Value customer input listen with respect and empathy.

Why it matters: We thrive when our customers trust us. Putting their needs first helps us build lasting partnerships and solve real problems.



2

Move Fast

Speed matters. We’re not afraid to fail we’re afraid to move too slowly.

- > Make fast, informed decisions.
- > Push decision-making to those closest to the information.
- > Attack waste and be lean in your thinking.
- > Value progress over perfection.
- > Understand our legacy but don’t be bound by it.

Why it matters: Fast, focused action helps us stay ahead in a competitive industry. Speed without sacrificing quality is our edge.



Our Values How We Work

Together, these values form the foundation of our culture and fuel the success of our mission to innovate and create safer skies.



3

Own It

We act like founders because this is our company.

- > Take full responsibility for your actions and results.
- > Hold your colleagues accountable, with empathy.
- > Never say “that’s not my job.”
- > Bring a “whatever it takes” mentality.
- > Ask for help when you need it.

Why it matters: When we all act like owners, we create a culture of trust and performance. Empowered people make empowered decisions.



4

Speak Candidly

We believe in truth told with respect.

- > Be open, transparent, and authentic.
- > Share the truth, good or bad, as soon as possible.
- > No assholes. We’re direct, but we’re kind.
- > Invite blunt feedback, and give it constructively.
- > Aim for a candor score of 8 out of 10.

Why it matters: Honest conversations lead to better results. We don’t let problems fester we surface them and solve them together.



Doing the Right Thing, Every Time.

You are our culture. Every action matters.

Through this Code we are making a commitment to each other to:

Act **ethically, honestly, and transparently**

Comply with all **law and regulations**, this Code and our **policy framework**

Live our **Founder's Mentality**: You are empowered to act and accountable for what you do

Hold ourselves and each other **accountable**

Speak Up: No Retaliation

Speak Up: No Retaliation

We count on each other to raise concerns early. Speak up if something feels wrong. We will never tolerate retaliation against anyone who reports in good faith.

Where to report:

- > Your manager or team lead
- > Human Resources or Legal
- > The Acron Aviation Ethics Hotline (anonymous option available)



Health and Safety



Health and Safety

Nothing we do is more important than keeping people safe.

At Acron Aviation, we are committed to maintaining a work environment where safety is embedded in everything we do from our factory floors to our offices, from our testing labs to our customer sites. Safety is not a department; it is everyone’s responsibility.

Our Commitment:

We aim for zero harm physically, mentally, and emotionally. We meet or exceed all applicable safety regulations and go further by building a culture where people look out for one another.

What We Expect From You:

- > Always follow all safety procedures and protocols no shortcuts:
- > Report hazards or unsafe conditions immediately to your supervisor, the Health & Safety team, or through the Acron Aviation Safety system.
- > Take part in all required safety training and refreshers.
- > Use proper personal protective equipment (PPE) and maintain it in good condition.
- > Stop work immediately if a task seems unsafe or if you feel unprepared or untrained.
- > Support a culture of learning, report incidents and near misses so we can learn and improve.
- > Participate in safety drills, inspections, and audits as required.



Why It Matters

Lives are at stake, ours, our customers’, and those who rely on the integrity of our aviation systems. A safe workplace protects people, performance, and our mission.

A Safe Workplace



A Safe Workplace

We believe in creating a workplace that’s safe, respectful, and inclusive for everyone.

What we expect:

- > Treat people fairly and respectfully, regardless of background, beliefs, gender, race, or identity.
- > No discrimination, harassment, bullying, or offensive behavior.
- > Speak up when you see something wrong.

Appropriate Use of Social Media:

- > Be respectful and professional in all your posts, even on personal accounts.
- > Never share confidential or proprietary Acron Aviation information online.
- > Avoid posts that damage our reputation or hurt others.

Modern Slavery:

- > No forced labor, human trafficking, or unethical sourcing across our supply chain.
- > Report any suspicion of violations.

No Drugs or Alcohol at Work:

- > Be fit to work. No impairment, ever.



Why It Matters

Candor is at the core of our values, and without respect and inclusion we cannot have candid conversations.



Anti-Corruption and Bribery

We compete on merit not favors. Bribes, kickbacks, and unethical behavior have no place here.

This means:

- > Never offer, give, or accept bribes or favors
- > Gifts, meals, and entertainment must be modest and transparent
- > Complete our regular training
- > Follow our Anti-Corruption Policy at all times

Why It Matters

Corruption is not only unethical it’s illegal. Even one incident can expose Acron Aviation to severe legal penalties, criminal charges, reputational damage, and loss of customer or government trust. As we grow and operate in global markets, we must be especially vigilant.

Integrity is one of our most valuable assets and it’s non-negotiable.



Conflicts of Interest



Conflicts of Interest

We trust you to always act in Acron Aviation’s best interests. A conflict of interest happens when your personal interests, whether financial, professional, or relational, interfere with your ability to make objective decisions on behalf of Acron Aviation.

Even the appearance of a conflict can damage trust. If you’re not sure whether something poses a conflict, disclose it.

Watch out for:

- > Personal relationships influencing business decisions
- > Side jobs that interfere with your work
- > Investments in competitors or partners

Disclosure and Oversight:

- > Disclose any potential or actual conflicts of interest to Legal, HR, or your direct manager.
- > Disclosures will be reviewed confidentially and fairly.
- > In some cases, a management plan may be created to reduce or eliminate the conflict.



Why It Matters

Candor is our foundation, and trust comes from candor. Conflicts of interest, real or perceived, can undermine team confidence, damage relationships, and expose Acron Aviation to risk.

Trade Compliance



Trade Compliance

Acron Aviation conducts business globally, and we are committed to full compliance with all applicable export, import, and trade compliance laws wherever we operate.

What this means:

- > Follow all laws governing the export and import of goods, technology, software, and services.
- > Know whether your work involves export-controlled data or items and understand your obligations.
- > Obtain the required licenses and approvals before sharing controlled data or shipping products internationally.
- > Accurately classify products and keep complete, truthful shipping and customs documentation.
- > Follow our Trade Compliance Policy at all times

You must not:

- > Engage in transactions with sanctioned countries, entities, or individuals unless properly authorized.
- > Mislabel, undervalue, or misrepresent any item or shipment.
- > Share controlled technical information with foreign nationals without a proper license.



Why It Matters

Trade compliance protects national security and keeps Acron Aviation trusted and authorized to do business globally. Mistakes can lead to serious legal penalties and reputational damage.

Working with Government and Third Parties



Working with Governments and Third Parties

Extra care is needed when working with government officials or on public contracts.

Do:

- > Get proper approvals before engaging with government reps
- > Follow all due diligence steps for third parties
- > Document everything

Why It Matters

Governments hold us to the highest standards. Whether we’re responding to a public tender, hosting regulators, or working with third-party suppliers on government projects, our behavior must be beyond reproach. Even small compliance failures can result in legal penalties, contract loss, or disqualification from future opportunities.



Protecting Company Assets



Protecting Company Assets

Our tools, systems, time, and information are critical resources, and they must be used responsibly to protect the integrity of Acron Aviation. These assets enable us to operate efficiently, deliver exceptional value to customers, and maintain our competitive edge. It’s essential that every employee takes ownership of protecting these resources.

Use them responsibly.

- > Don’t misuse equipment or data
- > Keep intellectual property and trade secrets confidential
- > Report theft, fraud, or misuse immediately

Why It Matters

Every asset at Acron Aviation represents value we’ve created together. Protecting these resources keeps our business secure, our innovation safe, and our customers’ trust intact. If our assets are lost, leaked, or abused, we don’t just lose tools we risk losing our competitive edge and our reputation.



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Cybersecurity

Strong cybersecurity practices help us prevent breaches, maintain the integrity of our systems, and ensure compliance with data privacy laws.

What you must do:

- > Use strong, unique passwords and multi-factor authentication (MFA) for all accounts. We will have mandatory minimum security requirements we all must follow.
- > Don’t share confidential information unless necessary for business purposes. This includes customer data, proprietary company information, or intellectual property. Only disclose this information to those who need it to perform their duties, and always ensure it’s done securely.
- > Be alert for phishing or suspicious activity. Be cautious of unsolicited emails or messages asking for sensitive information, especially when they contain links or attachments. Always verify the source before clicking. If you receive something suspicious, report it immediately. Complete the refresher training courses to ensure you are aware of the latest scams and threats.
- > Follow our IT Security Policies at all times. These policies set the standards for securing company devices, networks, and data. Ensure that you adhere to guidelines regarding device security, software installations, and data storage.



Why It Matters

Cyber threats are constant and evolving. A single mistake can lead to data breaches, customer loss, regulatory penalties, and reputational damage. Strong cybersecurity isn’t optional; it’s part of how we build trust and protect our business. Every employee is a line of defense and social engineering cyber attacks are ever increasing.



Data Protection

Special care for personal and customer data:

So much of our work involves handling personal information (names, emails, payment information, health records, etc.), you must:

- > **Collect only what’s necessary, and use it only for legitimate business purposes**
- > **Limit access** to those with a need to know
- > **Store data securely** and encrypt when required
- > **Retain data only as long as necessary**, and then delete it in accordance with Acron Aviation’s retention policies

Why It Matters

Data is one of our most valuable assets. Failing to protect personal, proprietary, or customer data can lead to regulatory fines, lawsuits, and irreversible damage to our reputation. Our ability to innovate and grow depends on maintaining trust, and that trust starts with how we handle information. A data leak or breach doesn’t just impact systems, it impacts people.



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Environmental Responsibility & Sustainability

We are committed to minimizing our impact on the planet and promoting sustainable practices across our business.

Do your part by:

- > Reducing waste and energy usage
- > Complying with environmental laws and policies
- > Supporting greener ways of working

Why It Matters

As an aviation company, our environmental footprint matters not just to regulators and customers, but to future generations.

Responsible practices help us meet global climate goals, reduce costs, mitigate legal risk, and earn the trust of stakeholders who care deeply about our environmental impact.



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Product Safety

At Acron Aviation, product safety is not negotiable. We design, build, and deliver solutions that are critical to the safety of people in the air and on the ground. That responsibility drives everything we do.

Our commitment:

- > Safety is embedded in our culture, systems, and daily decisions.
- > We follow all applicable regulatory and certification standards.
- > Every employee, supplier, and partner must be relentless in identifying and addressing potential risks.

What we expect from you:

- > Report any product-related safety concern immediately no exceptions.
- > Follow established safety and quality protocols without shortcuts.
- > Refuse to release or approve any product that does not meet our full safety requirements.
- > Raise your hand if something seems off even if it slows things down.

Why It Matters

Lives depend on the integrity of our products. We will never compromise on safety for any reason.





Counterfeit Materials

We design and deliver products that lives may depend on. That means every component must meet our quality and safety standards - with no exceptions. The use of counterfeit, unapproved, or suspect materials is strictly prohibited.

What this means:

- > Only source parts and materials from approved, verified suppliers
- > Follow all procurement and inspection procedures, including receiving inspection, traceability, and certification reviews
- > Be alert for warning signs of counterfeit or tampered materials, such as irregular labeling, missing documentation, or unusual pricing
- > Never substitute components or materials without prior engineering and quality approval
- > Report any suspected counterfeit parts immediately to the Quality lead
- > Cooperate fully with investigations into counterfeit risks, including containment, traceability, and supplier audits



Why It Matters

Counterfeit or non-conforming materials can cause product failures, safety incidents, and regulatory violations. They threaten our reputation, customer trust, and safety. By staying vigilant and committed to quality, we help ensure that every part that goes into our systems is something we stand behind, without compromise.



Political Contributions and Lobbying

Acron Aviation is committed to conducting all political activity with integrity, transparency, and in strict compliance with the law.

Key guidelines:

- > Acron Aviation does not use company funds for direct political contributions unless explicitly permitted by law and reviewed and approved by Legal and the VP, Strategy.
- > Employees must obtain pre-clearance for any personal political contributions or fundraising that might involve Acron’s interests, particularly:
- > Contributions to candidates or causes impacting our industry
- > Activities tied to lobbying groups
- > Any political activity where the employee has a leadership role
- > All approved political contributions must be documented and auditable.

Lobbying activities:

- > Must be approved by the VP, Strategy
- > Must comply with all federal, state, and local laws

Transparency and oversight:

- > Acron submits required lobbying disclosures (e.g., Form LD-203)
- > We maintain detailed logs of all political contributions and lobbying payments
- > Gifts, meals, or gratuities to government officials are never permitted in violation of ethics rules



Why It Matters:

Political influence must never compromise our integrity or reputation. We must avoid even the appearance of impropriety when it comes to political involvement.

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Final Word

No set of rules can cover every situation. This Code is a foundation, not a ceiling. Let our values guide your judgment, and never hesitate to ask questions.

When in doubt, speak up.

Together, we’re building a future of safer skies.

