COMPASS CARGO AIRLINES

GENERAL CODE OF CONDUCT

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1. Environmental Commitment

At Compass Cargo Airlines, we recognize our responsibility to minimize our environmental impact. We are committed to:

• Reducing greenhouse gas emissions through efficient fuel use and advanced technology.

• Implementing waste reduction and recycling programs.

• Promoting the use of environmentally friendly materials and practices.

• Complying with all relevant Bulgarian and international environmental laws and regulations, including EASA and ICAO standards.

2. Employee Health and Safety (H&S)

The health and safety of our employees are paramount. We are dedicated to:

• Providing a safe and healthy working environment.

• Conducting regular safety training and drills.

• Ensuring all operations comply with EASA, ICAO, and national safety regulations.

• Reporting and investigating any incidents promptly and thoroughly.

3. Labor Relations

We believe in fostering a respectful and collaborative working environment. Our commitments include:

• Respecting employees' rights to freedom of association and collective bargaining.

• Engaging in fair and transparent negotiations with employee representatives.

• Addressing labor disputes promptly and fairly.

4. Career Management and Training

Investing in our employees' development is crucial to our success. We are committed to:

• Providing continuous training and development opportunities.

• Supporting career progression and professional growth.

• Ensuring all training programs align with industry standards and regulatory requirements.

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• Conducting due diligence on all financial transactions.

• Training employees on anti-money laundering regulations and procedures.

• Reporting any suspicious activities to relevant authorities.

11. Anti-Competitive Practices

We believe in fair competition and adhere to all relevant laws. Our commitments include:

• Avoiding any anti-competitive agreements or practices.

• Training employees on competition laws and regulations.

• Ensuring compliance with Bulgarian and international competition laws.

12. Sustainable Procurement

We are committed to sustainable procurement practices. Our policies include:

• Working with suppliers who adhere to ethical and environmental standards.

• Conducting regular assessments of our supply chain.

• Prioritizing suppliers that demonstrate a commitment to sustainability and compliance with EASA and ICAO standards.

Implementation and Monitoring

Compass Cargo Airlines will regularly review and update this Code of Conduct to ensure its relevance and effectiveness. We expect all employees and business partners to adhere to these principles and will provide the necessary training and resources to support compliance. Regular audits and assessments will be conducted to monitor adherence and address any violations promptly.

Approved by: Galin Pankov , CEO

[Date] 05 January 2024