

Statement of Business Ethics

At Bigorre Aerospace Corporation (BAC), we are proud of our legacy of integrity, innovation, and excellence. This statement outlines the core ethical principles and commitments that define how we do business and what is expected of every employee and representative of BAC.

Our Ethical Foundation

Since our founding in 1987, BAC has built a culture based on:

- Mutual trust and respect
- Individual responsibility and sound judgment
- Commitment to excellence in everything we do

We rely on every employee to uphold these principles, particularly when facing difficult decisions. If you encounter a situation where you are unsure how to proceed, you are encouraged to seek guidance from your manager or a designated ethics representative.

Our Commitments to Stakeholders

We recognize our responsibility to a wide range of stakeholders—employees, customers, shareholders, suppliers, and communities.

BAC's business conduct is guided by the following commitments:

To Our Employees

- Equal opportunity in a safe and respectful work environment
- Fair pay, comprehensive benefits, and opportunities for advancement
- A culture of fairness, dignity, and professional growth

To Our Customers

- High-quality products and services at fair prices
- Reliable customer service and product support

To Our Shareholders

- Responsible management that aims for long-term value and returns

To Our Suppliers

- Fair, open, and ethical business relationships
- Supplier selection based on quality, price, service, and shared values

To Our Communities

- We recognize our responsibility to maintain a clean and healthy physical environment. We strive to establish appropriate relationships with our neighboring communities, schools, local governments, and the families of employees

Procurement Integrity

What's Prohibited

- No acceptance or offering of kickbacks, bribes, or improper gifts
- No special treatment in procurement or sales due to personal gain
- No favors that could compromise objectivity or create conflicts of interest

Gifts and Entertainment

- Never accept or offer anything that could influence business decisions
- All transactions must stand up to public and internal scrutiny
- Special rules apply to U.S. Government business—no gifts or courtesies to federal employees.

Behavioral Integrity Standards

BAC maintains high standards of behavior and expects employees to act with professionalism and respect. Our core policies include:

- Equal opportunity and non-discrimination
- Diversity and inclusion
- Confidentiality of personal and company information
- A drug-free workplace
- Zero tolerance for sexual harassment or any form of intimidation

Further details are contained in the Employee Handbook, and on official bulletin boards.

If You See Something, Say Something

If you witness behavior that goes against our ethical standards, speak up. Report concerns to your manager, HR, or through BAC's ethics reporting channels. You will be protected against retaliation for good-faith reports.

Living the BAC Way

Ethical business is not just a requirement—it's part of our identity. By joining BAC, employees commit to conducting themselves with honesty, fairness, and integrity. Together, we'll continue to build a company that leads with values and earns trust around the world.

Our Bottom Line: Ethical conduct always comes first.

Human Rights & Anti-Trafficking Compliance

Human Trafficking Compliance Plan

U.S. Regulation FAR 52.222-50

Purpose

Bigorre Aerospace Corporation (BAC) is opposed to human trafficking in all forms and is supportive of the U.S. Federal Acquisition Regulation 52.222-50 Combating Trafficking in Persons (hereafter referred to as FAR 52.222-50) to combat human trafficking, and will ensure the risk of such practices is mitigated within the business. FAR 52.222-50 prohibits U.S. Government contractors and their agents from engaging in any form of trafficking in persons, defined to mean the recruitment, harboring, transportation, provision or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, debt bondage or slavery and sex trafficking. To comply with FAR 52.222-50 all applicable businesses engaged in contract with the U.S. Government must develop a Compliance Plan to ensure such mitigation of risks.

Applicability

BAC's Human Trafficking Compliance Plan applies to all acquisition activities in support of BAC contracts or subcontracts with the U.S. Government for supplies or services with no exception.

The plan is to be adhered to by employees, suppliers, contractors, subcontractors, subcontractor employees and agents of BAC, including subsidiaries and joint ventures controlled by BAC, performing work under a U.S. federal government contract.

Appropriateness

A Compliance Plan must be appropriately tailored to the size and complexity of the U.S. Government contract, and to the nature and scope of the activities to be performed. BAC reserves the right to review and revise its Human Trafficking Compliance Plan should the nature and complexity of its contracts with the U.S. Government change.

Compliance Plan

Training and Awareness: Human Trafficking Awareness Training is conducted annually for all employees and on an as needed basis to reinforce the U.S. Government's and BAC's zero tolerance policy. Training materials are available to contractors and third parties upon request.

Supplier Code of Conduct: BAC maintains a Supplier Code of Conduct. This Supplier Code of Conduct expresses the expectations we hold for Suppliers, including adherence to regulations prohibiting human trafficking and compliance with all applicable local laws in the country or countries in which they operate. Suppliers must refrain from violating the rights of others and appropriately address any adverse human rights impacts of their operations.

Recruitment, Wages and Housing: BAC prohibits misleading or fraudulent recruiting practices during all recruitment activities. BAC will only use recruitment companies who do not charge recruitment fees to the employee and will review upon engagement recruitment companies' terms of business to ensure compliance.

BAC will take measures to ensure employee wages meet applicable country legal requirements or will explain any variance. In the event that BAC or its contractors,

suppliers and agents intend to provide or arrange housing in connection with performing work under a contract that meets the requirements, housing will meet host country housing and safety standards.

Contractors, Suppliers and Agents: The requirement to adhere to FAR 52.222-50 is mandatory to all contractors, suppliers and agents BAC engages with. This requirement is to be flowed down to all sub-tier contractors, suppliers and agents who engage in business indirectly with BAC. The substance of FAR 52.222-50 will be included in subcontracts and in contracts with agents. However, requirements for a Compliance Plan apply only to any portion of the subcontract that meets the same prime contractor thresholds. BAC requires contractors, suppliers and agents to comply with all applicable local, state and national government laws and regulations of the local region they are conducting operations in. Upon request, information will be made available to all contractors, suppliers and agents on combating human trafficking including copies of this plan and internal training materials. BAC reserves the right to observe contractor premises for any violations of FAR 52.222-50 and to take appropriate action and remedies if a problem arises, and to terminate any contract should a report of violation be substantiated.

Reporting Violations: Should employees or contractors, suppliers and agents be unsure as to whether a specific action would be a violation of FAR 52.222-50, they should consult BAC's legal department. All employees or contractors, suppliers and agents are required to report information or knowledge of human trafficking internally. If the employee does not feel comfortable reporting this information internally, they should contact the Global Human Trafficking Hotline at 1-844-888-FREE or via email help@befree.org. Retaliation against an individual who has reported a violation will not be tolerated.

Posting: BAC displays FAR 52.222-50 Combating Trafficking in Persons posters including making available the phone number of the Global Human Trafficking Hotline (U.S.) 1-844-888-FREE and email address of help@humantraffickinghotline.org.

Certifications: Annually after receiving an award, BAC will certify that;

- 1) it has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any agent, subcontractor or subcontractor employee engaging in prohibited activities and,
- 2) After having conducted due diligence, to the best of BAC's knowledge and belief, neither it nor any of its agents, subcontractors or their agents are engaged in trafficking activities; or if abuses related to any of the prohibited trafficking activities have been found, BAC or its subcontractor has taken the appropriate remedial and referral actions.



COMBATING TRAFFICKING IN PERSONS

U.S. DEPARTMENT OF DEFENSE

STOP Human Trafficking

Force, fraud, or coercion to compel a person to provide labor, services, or commercial sex.

Victims come from all backgrounds and can be women, men, and children.

Any minor (under 18 years of age) involved in commercial sex is a victim of human trafficking.

Recognize SIGNS

Physical/Environmental Indicators include signs of abuse, no identification, confined to worksite.

Psychological/Behavioral Indicators include submissive, anxious, lack of free will.

REPORT IT

Chain of Command

Local Law Enforcement

DoD Inspector General Hotline

1-800-424-9098 or visit <http://www.dodig.mil/hotline>

National Human Trafficking Hotline

1-888-373-7888.



For more information go to:

CTIP.defense.gov/



**There's no
One face**



Sustainability

The need for sustainable transportation has never been more pressing.

With the rising concern for the environment and its resources, designers and engineers are constantly working towards finding ways to make transportation more eco-friendly.

The future of transportation lies in conscious design and responsible sourcing, where sustainability and functionality coexist.

At Bigorre Aerospace Corporation, sustainability is at the heart of everything we do.

From the materials we use to the way we operate, we are committed to reducing our environmental impact and contributing to a cleaner, healthier world.

Our LED environment friendly products are just one example of our dedication to reducing carbon emissions, and we are constantly pushing the boundaries of R&D to develop even more low power consumption solutions.

We believe in the power of repair and refurbishment, recognizing that every product has the potential for a long and fruitful life cycle.

We are committed to ensuring that our products are lightweight and easy to repair.

We will continue to seek out ways to reduce our carbon footprint, minimize waste, and operate in a way that respects our planet and its resources.

Ultimately, we see our sustainability efforts as a reflection of our values.

We are dedicated to making a difference, and we are proud to offer products that align with the values of conscious design, responsible sourcing, and long-term thinking.

We believe that by working together, we can create a brighter, more sustainable future for all.

