

## **Precision Heli-Supports Ethics Policy**

(Abbreviated from the Tumeq Employee Handbook)

Precision Heli-Support follows the Values and Ethics set forth by our parent company, TUMEQ, LLC. (A Kuskokwim Subsidiary.)

### **The Values and Ethics of Tumeq, LLC and Operation Companies**

It is the Company's policy and that of its operating companies that each employee conducts his or her business affairs with such standards of integrity that no conflict of interest exists or can be reasonably implied or construed. The basic value that guides us is this:

**Respect for others; including shareholders, customers, partners and co-workers.**

**Honesty and integrity in all of our daily activities.**

Each employee should know and live by this value. In living this value, each employee and all of the stakeholders will proudly state "we are proud to be associated with this great company."

#### **Purpose**

The Company operates in an exceedingly competitive and complex environment. The competitive aspect could lend itself to intentional ethical shortcuts, or because of complexity to unintentional ones. The purpose of the Code of Business Conduct is to spell out what is expected of employees in the course of their daily actions.

#### **Scope**

The Code of Conduct is applicable to all executives, managers, and employees of Tumeq, LLC and its operating companies without exception

#### **Implementation**

The Tumeq, LLC Employee Handbook is available to all employees. Precision Heli-Support provides access to this handbook through the PHS server. Additionally, it is required that each employee received, read and understands the Code. The code will be reviewed annually and modified as required.

#### **A Program Built on Trust**

Each individual employee is considered a valuable asset, to be respected and nurtured, both as an empowered individual and as a team member. The company has remained focused on the individual and is committed to providing a safe workplace that is free from harassment and discrimination where each employee is encouraged to set high goals.

#### **Compliance with the Laws**

We are committed to comply with Federal, State and Local laws, rules and regulations and actively promote awareness, understanding of and compliance with all applicable laws, specifically to include all environmental laws in the performance of work on contracts with the U.S. Government.

#### **Safe and Healthy Workplace**

We are committed to provide a safe and healthy work environment, to comply with all Federal, State and Local health and safety laws and regulations, and any government contract clause setting forth the requirements to comply.

### **International Behavior**

We follow the codes of conducts and rules of business of countries where we do business and abide by their laws. Conduction business internationally can sometimes present difficult ethical choices when conflict exists between the U.S. Federal Acquisition Regulations, U.S. laws and Local laws. Note that while working overseas, you and the Company are not only subject to the laws of the Host Nation, but to certain U.S. laws. If a PHS employee is travelling overseas, the Human Resources Department will provide additional training.

### **Conflict of Interest**

We do not take any role in any outside concern that would adversely influence our responsibilities to the Company. When faced with potential conflict, we communicate with supervisors and others to implement safeguards and take steps to prevent such a conflict from materializing. We make full disclosure and withdraw ourselves from discussion and decisions when our personal interest appears to interfere with the Company's business interests.

### **Rights and Property**

We respect the rights and property of others, including their intellectual property and only accept their confidential or trade secret information after we clearly understand our obligations as defined in a non-disclosure agreement or similar document. We Protect and preserve the Company's assets, including business opportunities and intellectual property, for the Company's benefit and not for our personal benefit.

### **Fairness in Competition**

We compete fairly, observing the market's complex procurement rules, always mindful of the fine line between aggressive competition and unethical behavior. We assure that those who seek to do business with the Company, have fair opportunities to compete for our business.

### **Accuracy of Information**

We provide full and accurate information for use in internal and external reports. We keep records that are verifiably accurate.

### **Report Unethical Behavior**

We actively encourage every employee, manager and officer to recognize and report any concern about possible illegal or unethical behavior, and we ensure that such reports made in good faith will be acted upon responsibly and without retaliation.

### **Open Workplace**

We create a workplace where we feel free to express our opinions and to raise questions and concerns in a safe and supportive environment, without fear or harassment, retribution or retaliation by peers or managers.

## **Compliance, Procedures, Policies and Rules**

All employees of Tumeq, LLC and its operation companies are expected to comply with the Company Values and Code of Business Conduct. All managers are expected to ensure that employees in their organizations comply with the Company Values and the Code of Business Conduct. All employees are expected to address any noncompliance that comes to their attention. Violation of these provisions is a violation of Company policy and may result in disciplinary action up to and including termination.

Regular and alternative communication channels are available to help ensure compliance, whether an individual employee needs help applying these requirements to his or her own situation, or the employee is bringing the incident forward for review or corrective action.

**-Take Direct Action.** The best and most effective approach is to fix it on the spot. Merely highlighting and discussing the issue will result in actions that achieve the desired goal.

**-Consult Your Supervisor.** Your supervisor knows your assignment and circumstances better than anyone else. Company supervisors can often help you find your answers and solutions.

**-Talk with Human Resources.** If for any reason you cannot communicate with your supervisor or local managers, you should contact Human Resources. HR is there to help you resolve many issues. You may consult them anytime. Call (843) 856-2495; email [hr@tumeq.com](mailto:hr@tumeq.com); or use the email report process. (See below.)

**-Contact the Tumeq Ethics Officer.** At any time, for any reason, you can contact the Tumeq Ethics Officer for answers to your questions. Call (843) 856-2495 or email the [ethics@tumeq.com](mailto:ethics@tumeq.com).

The Company has established with a third party vendor, InTouch, Inc. an email reporting system that provides the opportunity for employees to email a message to Company management in complete anonymity, or you may also elect to provide your contact information. The email is sent to InTouch, Inc. where it can be sanitized of sender information, if anonymity is elected, before being sent to the Company Ethics Officer. Note that email reporting can be used for any purpose; to report ethics violations, unsafe practices, or anything you believe should be brought to senior management's attention. This email can also be used to call attention to pleased customers or exceptional work or actions by employees.

**Email Report Address:  
TellTumeq@getintouch.com**