



## CODE OF CONDUCT

### 1. INTRODUCTION

1.1. AirTLG Code of Conduct is the way we implement our company's values. We recognize and uphold that everything we do in connection with our work at AirTLG will be, and should be, measured against the highest possible standards of ethical business conduct. We set the bar that high for practical as well as aspirational reasons: Our commitment to the highest standards helps us recruit great people, develop great products, and attract loyal clients. Respect for our clients, for the opportunity, and for each other are foundational to our success, and are something we need to aspire.

1.2. We expect all of our Board members and employees to know and follow the Code. Failure to do so can result in disciplinary action, including termination of employment. Moreover, while the Code is specifically written for AirTLG Teammates – which include Board members and employees, we expect members of our extended staffs (temps, vendors, and independent contractors) and others who may be temporarily assigned to perform work or services for AirTLG to follow the Code in connection with their work for us. Failure of a member of our extended staffs or other covered service provider to follow the Code can result in termination of their relationship with AirTLG.

1.3. Should anyone have a question or concern, you are strongly recommended to seek clarify with your immediate superior. You may also send a question or raise a concern of a suspected violation of our Code or any other AirTLG policy through the AirTLG Helpline ([singa@airtlg.com](mailto:singa@airtlg.com)) or with a government agency.

2. **NO RETALIATION.** AirTLG prohibits retaliation against any Teammates who reports or takes part in an investigation of a possible violation of our Code, policies, or the law.

3. **SERVE OUR CLIENTS.** Our clients value AirTLG not only because we deliver great products and services, but because we hold ourselves to a higher standard in how we treat our clients and others. Keeping the following principles in mind will help us to keep that high standard:

3.1. **Integrity.** Our reputation as a company that our clients can trust is our most valuable asset, and it is up to all of us to make sure that we continually earn that trust. All of our communications and other interactions with our clients should increase their trust in us.

3.2. **Usefulness.** Our products and services should make AirTLG more useful for all our clients. We have many diverse

types of clients, from small businesses to large hospitality properties, but one guiding principle: “Make ourselves useful!”

3.3. **Responsiveness.** Part of being useful and honest is being responsive: We recognize relevant client's feedback when we see it, and we do something about it. We take pride in responding to communications from our clients, whether questions, problems, or compliments. If something is broken, fix it.

3.4. **Take Action.** Any time you feel our clients are not being well-served, do let someone in the company know about it. Continually improving our products and services takes all of us, and we are proud that AirTLG partners with our clients and take the initiative to step forward when the interests of our clients are at stake.

### 4. SUPPORT AND RESPECT EACH OTHER

4.1. AirTLG has an unwavering commitment to prohibiting and effectively responding to harassment, discrimination, misconduct, abusive conduct, and retaliation. To this end, AirTLG adheres to these Guiding Principles:

4.1.1. **Commitment:** AirTLG is committed to a respectful, safe, and inclusive working environment for all employees and members of the extended staffs.

4.1.2. **Care:** AirTLG creates an environment with an emphasis on respect for each individual at all levels of the company, including specifically by supporting and showing empathy to employees and members of the extended staffs throughout and after the complaint process.

4.1.3. **Transparency:** AirTLG is open and transparent as a company about the frequency with which complaints arise regarding harassment, discrimination, misconduct, abusive conduct, and retaliation, and the company's approach to investigating and responding to those allegations.

4.1.4. **Fairness & Consistency:** AirTLG ensures that individuals are treated respectfully, fairly, and compassionately in all aspects and applies policies, procedures, and outcomes consistently regardless of who is involved.

4.1.5. **Accountability:** AirTLG upholds all individuals responsible for their actions, and ensures that where right, those individuals hold others accountable too.

4.2. Consistent with the Principles, Teammates are expected to do their utmost to create a supportive work environment, where everyone has the opportunity to reach their fullest potential, and



be free from harassment, intimidation, bias, and unlawful discrimination.

4.2.1. Equal Opportunity Employment. Employment here is based solely upon individual merit and qualifications related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled.

4.2.2. Harassment, Discrimination, and Bullying. AirTLG prohibits discrimination, harassment and bullying in any form – verbal, physical, or visual, as discussed more fully in our Policy Against Discrimination, Harassment and Retaliation. If you believe you have been bullied, harassed, or discriminated against by anyone at AirTLG, or by our partner or vendor, we strongly encourage you to immediately report the incident to your superior. Similarly, superiors and managers who learn of any such incident should immediately report it to the Board member. We will promptly and thoroughly investigate any complaints and take right action.

4.2.3. Drugs and Alcohol. Our position on substance abuse is simple: It is incompatible with the health and safety of our Teammates, and we DO NOT allow it. Consumption of alcohol is not banned at our offices but use good judgment and never drink in a way that leads to impaired performance or inappropriate behavior, endangers the safety of others, or violates the law. Illegal drugs in our offices or at sponsored events are strictly prohibited. If a manager has reasonable suspicion to believe that a Teammate's use of drugs and/or alcohol may adversely affect the Teammate's job performance or the safety of the other Teammates in the workplace, the manager may request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the Teammate's appearance, behavior, or speech.

4.2.4. Safe and Healthy Workplace. We are committed to a safe, healthy, and violence-free work environment. Behavior that poses risk to the safety, health, or security of our Teammates, or guests is prohibited. If you become aware of a risk to the safety, health, or security of our company, you should report it to your superior immediately. If it is life-threatening or an emergency, call your local police, fire, or other emergency responders first, and then report it to AirTLG.

## 5. AVOID CONFLICTS-OF-INTEREST

5.1. When you are in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of AirTLG or our clients, you may be faced with a conflict of interest. All of us should avoid

conflicts of interest and circumstances that reasonably present the appearance of a conflict.

5.2. When considering a course of action, ask yourself whether the action you are considering could create an incentive for you, or appear to others to create an incentive for you, to benefit yourself, your friends or family, or an associated business at the expense of AirTLG. If the answer is "Yes", then the action you are considering is likely to create a conflict-of-interest situation, and you should avoid it.

5.3. AirTLG highlights some common situations where conflict-of-interest may arise. It is important to understand that as circumstances change, a situation that previously did not present a conflict-of-interest may now present one. AirTLG provides guidance in several areas where conflicts of interest often arise:

5.3.1. Personal Investments. Avoid making personal investments in companies that are AirTLG competitors or business partners when the investment might cause, or appear to cause, you to act in a way that could harm AirTLG. You should also consider (1) any overlap between your specific role at AirTLG and the company's business, (2) the significance of the investment, including the size of the investment in relation to your net worth, (3) whether the investment is in a public or private company, (4) your ownership percentage of the company, and (5) the extent to which the investment gives you the ability to manage and control the company. Investments in venture capital or other similar funds that invest in a broad cross-section of companies that may include AirTLG competitors or business partners generally do not create conflicts of interest. However, a conflict of interest may exist if you control the fund's investment activity.

5.3.2. Outside Employment, Advisory Roles, Board Seats, And Starting Your Own Business. Avoid accepting employment, advisory positions, or board seats with AirTLG competitors or business partners when your judgment could be, or could appear to be, influenced in a way that could harm AirTLG. Additionally, because board seats come with fiduciary obligations that can make them particularly tricky from a conflict-of-interest perspective, you should notify your superior before accepting a board seat with any outside company. Finally, do not start your own business if it will compete with AirTLG.

5.3.3. Business Opportunities Found Through Work. Business opportunities discovered through your work here belong first to AirTLG, except as otherwise agreed to by AirTLG.

5.3.4. Inventions. Developing or helping to develop outside inventions that (1) relate to AirTLG's existing or reasonably anticipated products and services, (2) relate to your position at AirTLG, or (3) are developed using AirTLG corporate resources may create conflicts-of-interest. If you have any questions about potential conflicts or intellectual property ownership involving an



outside invention or other intellectual property, consult your superior.

5.3.5. Personal Relationships at Work. Certain relationships within AirTLG may compromise or be seen to compromise your ability to perform your job responsibilities, may create uncomfortable or conflicted positions, and may raise issues of fairness, favoritism, or harassment. Therefore, be mindful of how your relationships within AirTLG could affect or be perceived by others. Romantic, physical or familial relationships are not allowed between a Teammates where one individual is in a position to exercise authority or supervision over the other. This prohibition includes any situation where one person is in the reporting line of the other.

5.3.6. Accepting Gifts, Entertainment, And Other Business Courtesies. Generally, acceptance of inexpensive “token” non-cash gifts is permissible. In addition, infrequent and moderate business meals and entertainment with clients and infrequent invitations to attend local sporting events and celebratory meals with clients can be proper aspects of many AirTLG business relationships, provided that they are not excessive and do not create the appearance of impropriety. Before accepting any gift or courtesy, consult the superior get his/her approval.

5.3.7. Use Of AirTLG Products and Services. Avoiding potential conflicts-of-interest also means that you should not use AirTLG products, services, internal tools, or information in a way that improperly benefits you or someone you know or creates the appearance that you have an unfair advantage over clients outside of AirTLG.

## 6. PRESERVE CONFIDENTIALITY

6.1. AirTLG may occasionally get some press/media attention around our product and services, and that is usually fine. However, certain kinds of company information, if leaked prematurely into the press or to competitors, can hurt our business interests. Our responsibilities extend beyond not revealing Confidential AirTLG material – we must also:

6.1.1. Properly secure, label, and (when appropriate) dispose of Confidential AirTLG material.

6.1.2. Safeguard Confidential information that AirTLG receives from others under non-disclosure agreements.

6.1.3. Take steps to keep our trade secrets and other confidential intellectual property secret.

6.2. Confidential Information. Make sure that information that is classified as “Need to Know” or “Confidential” in AirTLG document is managed in appropriately. At times, a particular project or negotiation may require you to disclose Need to Know or Confidential information to an outside party: Disclosure of that information should be on an “only as needed” basis and only

under a non-disclosure agreement. In addition, it is mandatory to seek your superior’s involvement in conducting a prior security assessment of the outside party that is to receive the confidential information. Be sure to conduct the right due diligence and have the appropriate agreement in place before you disclose the information.

6.3. AirTLG Partners. Just as you are careful not to disclose confidential AirTLG information, it is equally important not to disclose any confidential information from our partners or clients. Do not accept confidential information from other companies without first having all parties sign an appropriate Non-disclosure Agreement. Even after the agreement is signed, try only to accept as much information as you need to conduct your business objectives.

6.4. Competitors/Former Employers. We respect our competitors and want to compete with them fairly. But we do not want their confidential information. The same goes for confidential information belonging to any AirTLG’s former Teammates.

6.5. Outside Communications. Teammates are to ensure that your outside communications (including online and social media posts) do not disclose confidential proprietary information or represent (or otherwise give the impression) that you are speaking on behalf of AirTLG unless you are authorized to do so by the company. The same applies to communications with the press/media. In general, before making any external communication or disclosure, you should consult with your superior.

## 7. PROTECT AIRTLG’S ASSETS

7.1. AirTLG has a well-earned reputation for generosity with our Teammates benefits and openness with confidential information shared within the company. Our ability to continue these practices depends on how well we conserve company resources and protect company assets and information.

7.2. Intellectual Property. AirTLG’s intellectual property rights (our trademarks, logos, copyrights, trade secrets, “know-how”, and patents) are among our most valuable assets. Unauthorized use can lead to their loss or serious loss of value. You must respect all copyright and other intellectual property laws, including laws governing the fair use of copyrights, trademarks, and brands. You must never use AirTLG’s (or its affiliated entities’) logos, marks, or other protected information or property for any business or commercial venture without pre-clearance from your superior. Likewise, respect the intellectual property rights of others. Inappropriate use of others’ intellectual property may expose AirTLG and you to criminal and civil fines and penalties. We strongly encourage you to report any suspected misuse of trademarks, logos, or other AirTLG intellectual property to the board members.



7.3. **Company Equipment.** AirTLG has the tools and equipment we need to do our jobs effectively but counts on us to be responsible and not wasteful with the AirTLG stuffs we are provided for. Company funds, equipment, and other physical assets are not to be requisitioned for purely personal use.

7.4. **Physical Security.** Always secure the important equipment, and your personal belongings, even while on AirTLG's premises. Always wear your badge visibly while on site. Do not tamper with or disable security and safety devices on the company's systems.

7.5. **Use of AirTLG's Equipment and Facilities.** Anything you do using AirTLG's corporate electronic facilities (e.g., our computers, mobile devices, network, etc.) or store on our premises (e.g., letters, memos, and other documents) might be disclosed to people inside and outside the company. For example, AirTLG may be required by law (e.g., in response to a subpoena or warrant) to monitor, access, and disclose the contents of corporate email, voicemail, computer files, and other materials on our electronic facilities or on our premises. In addition, the company may monitor, access, and disclose employee communications and other information on our corporate electronic facilities or on our premises where there is a business need to do so, such as protecting employees and clients, maintaining the security of resources and property, or investigating suspected employee misconduct.

## **8. ENSURE FINANCIAL INTEGRITY AND RESPONSIBILITY**

8.1. Financial integrity and fiscal responsibility are core aspects of corporate professionalism. The money we spend on behalf of AirTLG is not ours; it belongs to the company. Each person at AirTLG – not just those in Finance – has a role in making sure that money is appropriately spent, our financial records are complete and accurate, and internal controls are honored. This matters every time we expense something to AirTLG, sign a new business contract, or enter into any deals on AirTLG's behalf. AirTLG maintains a system of internal controls to reinforce our compliance with legal, accounting, tax, and other regulatory requirements in every location in which we operate. Stay in full compliance with our system of internal controls. The followings are some core concepts that lie at the foundation of financial integrity and fiscal responsibility here at AirTLG.

8.1.1. **Spending AirTLG's Money.** A core AirTLG value has always been to spend money wisely. When you submit an expense for reimbursement or spend money on AirTLG's behalf, make sure that the cost is reasonable, directly related to company business, and supported by appropriate documentation. Always record the business purpose (e.g., if you take someone out to dinner on AirTLG, always record in our expense reimbursement tool the full names and titles of the people who attended as well as the reason for the dinner) and comply with other submission

requirements. If you are uncertain about whether you should spend money or submit an expense for reimbursement, check with your superior. Managers are responsible for all money spent and expenses incurred by their direct reports and should carefully review such spend and expenses before approving.

8.1.2. **Signing a Contract.** Each time you enter into a business transaction on AirTLG's behalf, there should be documentation recording that agreement, approved by your superior. Signing a contract on behalf of AirTLG is important. Never sign any contract on behalf of AirTLG unless all of the following are met:

8.1.2.1. You are authorized to do so under our Signature Authority and Approval Policy. And the contract has been approved by a board member.

8.1.2.2. You have studied the contract, understood its terms and decided that entering into the contract is in AirTLG's interest. All contracts at AirTLG should be in writing and should contain all of the relevant terms to which the parties are agreeing – AirTLG does not permit "side agreements," oral or written.

8.1.3. **Recording Transactions.** If your job involves the financial recording of our transactions, make sure that you are fully familiar with all of the AirTLG policies that apply.

8.1.4. **Reporting Financial or Accounting Irregularities.** No one should ever interfere in any way with the auditing of AirTLG's financial records. Similarly, you should never falsify any record or account, including time reports, expense accounts, and any other AirTLG records. If you suspect or observe any of the conduct mentioned above or, for that matter, any irregularities relating to financial integrity or fiscal responsibility, no matter how small, immediately report them to a board member.

8.1.5. **Hiring Suppliers.** As AirTLG grows, we enter into more deals with suppliers of equipment and services. We should always strive for the best possible deal for AirTLG. This almost always requires that you solicit competing bids to make sure that you are getting the best offer. While price is important, it is not the only factor worth considering. Quality, service, reliability, and the terms and conditions of the proposed deal may also affect the final decision.

8.1.6. **Retaining Records.** It is important that we keep records for an appropriate length of time. The AirTLG Records Retention Policy suggests minimum record retention periods for certain types of records. These are great guidelines, but keep in mind that legal requirements, accounting rules, and other external sources sometimes specify longer retention periods for certain types of records, and those control where applicable.

## **9. OBEY THE LAW**

9.1. AirTLG takes its responsibilities to comply with laws and regulations very seriously and each of us is expected to



comply with applicable legal requirements and prohibitions. While it is impossible for anyone to know all aspects of every applicable law, you should understand the major laws and regulations that apply to your work. A few specific laws are easy to violate unintentionally and so are worth pointing out here:

9.1.1. Trade Controls. U.S. and international trade laws control where AirTLG can send or receive its products and/or services. These laws are complex, and apply to:

- 9.1.1.1. Imports and exports from or into the U.S.
- 9.1.1.2. Imports and exports of products from or into other countries, with additional concerns when those products contain components or technology of U.S. origin.
- 9.1.1.3. Exports of services or providing services to non-U.S. persons.

9.1.2. If you are in any way involved in sending or making available AirTLG products and services from one country to another, work with your superior to be absolutely sure that the transaction stays well within the bounds of applicable laws.

9.1.2. Competition Laws. Most countries have laws – known as “antitrust,” “competition,” or “unfair competition” laws – designed to promote free and fair competition. Generally speaking, these laws prohibit (1) arrangements with competitors that restrain trade in some ways, (2) abuse of intellectual property rights, and (3) use of market power to unfairly disadvantage competitors. Certain conduct is absolutely prohibited under these laws, and could result in your imprisonment, not to mention severe penalties for AirTLG. Examples of prohibited conduct include:

- 9.1.2.1. Agreeing with competitors about prices.
- 9.1.2.2. Agreeing with competitors to rig bids or to allocate customers or markets.
- 9.1.2.3. Agreeing with competitors to boycott a supplier or customer.

9.1.3. Other activities can also be illegal, unfair, or create the appearance of impropriety. Such activities include:

- 9.1.3.1. Sharing competitively sensitive information (e.g., prices, costs, market distribution, etc.) with competitors.
- 9.1.3.2. Entering into a business arrangement or pursuing a strategy with the sole purpose of harming a competitor.
- 9.1.3.3. Using AirTLG’s size or strength to gain an unfair competitive advantage.

9.1.4. Anti-bribery Laws. Like all businesses, AirTLG is subject to a lot of laws, both U.S. and non-U.S., which prohibit bribery in virtually every kind of commercial setting. The rule for us at AirTLG is simple – DO NOT bribe anybody, anytime, for any reason.

9.1.5. Non-Government Relationships. You should be careful when you give gifts and pay for meals, entertainment, or other business courtesies on behalf of AirTLG. We want to avoid the possibility that the gift, entertainment, or other business courtesy could be perceived as a bribe, so it is always best to supply such business courtesies infrequently and, when we do, to keep their value moderated.

9.1.6. Dealing with Government Officials. Offering gifts, entertainment, or other business courtesies that could be perceived as bribes becomes especially problematic if you are dealing with a government official. “Public/Government Officials” include any government employee; candidate for public office; or employee of government-owned or -controlled companies, public international organizations, or political parties. Several laws around the world, including the U.S. Foreign Corrupt Practices Act, specifically prohibit offering or giving anything of value to government officials to influence official action or to secure an improper advantage. This not only includes traditional gifts, but also things like meals, travel, political or charitable contributions, and job offers for government officials’ relatives. Never give gifts to thank government officials for doing their jobs. By contrast, it can be permissible to make infrequent and moderate expenditures for gifts and business entertainment for government officials that are directly tied to promoting our products or services (e.g., providing a modest meal at a day-long demonstration of AirTLG products). Payment of such expenses can be acceptable (assuming they are permitted under local law) but may require pre-approval from AirTLG board member.

## 10. CONCLUSION

10.1. AirTLG aspires to be a unique company. It is impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another’s good judgment to uphold a high standard of integrity for ourselves and our company. We expect all AirTLG Teammates to be guided by both the letter and the spirit of this Code. Sometimes, identifying the right thing to do is not an easy call. If you are not sure, do not be afraid to ask questions of your superior or our board members.

10.2. Our opened communication is at [singa@airtlg.com](mailto:singa@airtlg.com).

*Updated in January 2020*