

Foreign Corrupt Practices Act Anti Bribery and Anti Corruption Policy

Document reference: AVS ABC 001 | Version 1.0

Policy owner: President | Prepared October 23, 2026

Related policy: AVS COC 001 Code of Conduct

Approval requirement: Effective only when signed and dated by management

1 Purpose and scope

Aviation Spares Solutions, Inc. (AVS) prohibits bribery and requires compliance with the U.S. Foreign Corrupt Practices Act (FCPA) and other applicable anti-corruption laws. This policy governs aviation parts sourcing, sales, exchanges, leasing, consignment, repair management and all other AVS business worldwide.

It applies to directors, officers, employees and temporary personnel, and to agents, consultants, brokers and other representatives acting for AVS. Managers must communicate relevant requirements to business partners and obtain appropriate written commitments. This policy supplements the AVS Code of Conduct, AVS COC 001. Follow any stricter lawful customer requirement; pause and seek guidance if requirements conflict.

2 Prohibited conduct and the FCPA

No person acting for AVS may corruptly offer, promise, authorize or give money or anything of value, directly or indirectly, to a foreign official, foreign political party or party official, or candidate for foreign political office to obtain or retain business, direct business or secure an improper business advantage. An unsuccessful offer or an unpaid promise is still prohibited by this policy.

For FCPA purposes, foreign officials include officers or employees of non-U.S. governments, their departments, agencies or instrumentalities, public international organizations, and people acting in an official capacity for them. Personnel of government-owned or controlled airlines and other enterprises may qualify. Obtain qualified review before proceeding when official status is uncertain.

AVS also prohibits commercial bribery, kickbacks and requesting or accepting improper benefits. Anything of value can include cash, gifts, travel, entertainment, jobs, internships, discounts, donations or benefits for relatives. No amount makes a bribe acceptable. Do not use a third party to do what AVS cannot do directly, or deliberately ignore evidence that a benefit will be used improperly.

3 Gifts travel and hospitality

Any gift, meal, travel or hospitality offered or received must serve a legitimate business purpose, be modest and infrequent, be lawful, and comply with the recipient's rules. Obtain advance written approval from the President or an uninvolved authorized designee. Record the recipient, organization, business purpose, value and approval. No person may approve their own benefit or expense. Cash and cash equivalents are prohibited.

Do not offer gifts or hospitality to anyone evaluating, influencing or awarding an active bid or contract decision. Do not offer gifts or hospitality to any JetBlue personnel during an active RFP, renewal or negotiation. At other times, follow JetBlue's applicable disclosure and approval requirements as well as AVS approval requirements.

Proposed benefits involving public officials or personnel of government-owned entities require specific compliance review before any commitment. Travel must have a documented business agenda and reasonable costs; avoid personal extensions, family expenses or disguised allowances. Approval cannot authorize an improper payment.

4 Facilitation payments and personal safety

AVS prohibits facilitation payments to expedite routine government actions, even where a narrow legal exception might otherwise exist. This company rule applies to customs, permits, inspections and similar interactions. Official published fees paid to the authorized agency through normal channels may be paid with appropriate documentation.

If an immediate threat to health or physical safety creates an extortion situation, prioritize safety. As soon as safe, report the facts to the President or Vice President and accurately record any payment. Commercial pressure, possible lost business, shipment delay or a demand to meet a deadline does not justify bribery.

5 Agents suppliers and other intermediaries

Before engagement, the responsible manager must perform and document review proportionate to the party's role, location and risk. Confirm identity, relevant ownership and government connections, reputation, qualifications, the business need, proposed goods or services and reasonable compensation. Obtain uninvolved management approval and a written agreement describing goods or services, payment terms and anti-corruption obligations.

Investigate warning signs before proceeding, including unexplained commissions, requests for cash or unrelated accounts, concealed owners, vague services, unusual refunds, or an official insisting on a particular intermediary. Suspend the affected engagement or payment until concerns are resolved and documented. Do not split transactions or route payments through others to avoid review.

Monitor performance, invoices and changes in ownership or risk, with closer review of higher-risk representatives. Renew the review when circumstances change and at least annually for active higher-risk agents. Require relevant obligations to reach approved subcontractors; address breaches through corrective action, suspension or termination.

6 Accurate records and payment controls

Keep complete, accurate and timely records of transactions, commissions, expenses, gifts, discounts, credits and refunds. Record the true recipient, purpose, amount and supporting approval. False invoices, fictitious services, off-book funds, misleading descriptions and concealed payments are prohibited. These are AVS requirements for all business records.

Before payment, assigned personnel must verify the contract or purchase order, evidence of the goods or services, the payee, invoice and required approval. Use legitimate banking channels. Independently confirm changes to bank details through a trusted contact. An uninvolved reviewer must approve payments and expenses; where staffing limits segregation, management must document an independent compensating review.

Do not release a payment with an unresolved concern. Retain due diligence, agreements, receipts, approvals, training and investigation records under the company retention schedule and applicable legal or contractual requirements. Preserve records subject to a legal hold, investigation or audit, and correct errors transparently with an audit trail.

7 Conflicts donations and sponsorships

Disclose personal, family, financial or other interests that could affect objective decisions before participating in a transaction. An uninvolved decision-maker must approve documented safeguards, including recusal where needed. Disclose relevant conflicts directly to JetBlue.

Company charitable contributions, political contributions and sponsorships require prior written approval from the President or an uninvolved authorized designee, verification of the recipient and purpose, and accurate records. They must never reward an award decision, benefit an official improperly or disguise a bribe. Personal political activity must not use company resources or imply AVS support without authorization.

8 Reporting concerns

Report suspected bribery, suspicious payment requests, record falsification or other violations promptly to a manager, the President or the Vice President. Proof is not required for an honest report. Employees and outside parties may bypass the normal reporting line. Call (786) 842-1350 and request a private conversation with the President or Vice President.

Written reports may be addressed to either officer at Aviation Spares Solutions, Inc., 7930 West 26th Avenue, Units 3 and 4, Hialeah, Florida 33016, marked Private and Confidential. Anonymous written reports are accepted, although missing contact information may limit follow-up.

Report actual or suspected JetBlue-related violations to JetBlue Business Ethics and Compliance or its Business Integrity Hotline at 1-866-318-7453 or www.jblu.alertline.com. Anyone may report concerns to appropriate authorities without prior company approval. Preserve evidence and do not obstruct a report or investigation.

9 Fair review and protection from retaliation

AVS prohibits retaliation against anyone who honestly raises a concern, seeks guidance, refuses an improper payment or participates in a review, even if the concern is not substantiated. Report suspected retaliation through any reporting channel. Knowingly false allegations or fabricated evidence may result in action; an honest mistake does not.

If the President is implicated, report to the Vice President; if the Vice President is implicated, report to the President. An implicated person must not control the review. Where both are implicated or no internal route can reasonably be used, direct reporting to appropriate authorities remains available. AVS must arrange impartial review, using independent external expertise when needed.

Management must assess reports promptly, investigate as warranted, preserve evidence, document findings and verify corrective action. Share information only as necessary for a fair review, corrective action or legal duties, without promising absolute confidentiality. Violations may result in retraining, discipline up to termination, or termination of business relationships, subject to law and contract. Make required customer and authority disclosures.

10 Ownership implementation and review

The President owns this policy and must assign responsible personnel and appropriate resources for approvals, partner review, payment controls, training, reporting and records. No manager may waive a legal prohibition or authorize concealment. Personnel must seek qualified legal advice through uninvolved management when an FCPA issue cannot be resolved internally.

Before the effective date, management must confirm that reporting routes work, private handling and impartial escalation are assigned, and approval and payment controls are in place. Communicate the policy in a form personnel understand. Provide training on adoption, before relevant duties begin and at least annually, with additional instruction for higher-risk roles. Retain acknowledgments and training records.

Review this policy and its implementation at least annually and after material changes or incidents. Examine a proportionate sample of partner reviews, gifts and payments, track corrective actions and update controls. Retain version and approval history. Statements in bids and compliance questionnaires must be supported by the company's actual policies and practices.

Management approval

Approval makes this policy effective on the date entered below. Do not backdate approval.

Approved by: Angel Camacho, President

Signature: 

Effective date: October 23, 2026

Policy references reviewed October 23, 2026

Legal reference: U.S. Foreign Corrupt Practices Act, as amended. U.S. Department of Justice FCPA overview. <https://www.justice.gov/criminal/criminal-fraud/foreign-corrupt-practices-act>

Implementation reference: DOJ and SEC, A Resource Guide to the U.S. Foreign Corrupt Practices Act, Second Edition, Chapters 2 and 5. <https://www.justice.gov/criminal/criminal-fraud/fcpa-resource-guide>

Customer reference: JetBlue Business Partner Code of Conduct. <https://www.jetblue.com/our-company/business-partners>