

Message from Company Director

Great companies are measured on what they stand for and we are no exception. Our Code of Conduct captures the way we operate.

As well as complying with all laws and regulations wherever we operate, we apply our Code of Conduct to help us make the right decisions in everything we do. It gives our customers, employees, partners, suppliers, investors - and the many communities we serve - the confidence to trust us and do business with us.

Whether it's improving safety and reliability, delivering better service for our customers in tune with wider public considerations, all of us at HawkEye Drone Services Ltd are working hard to ensure that our company is on a solid foundation for the future. Strong performance is critical to our success, but just as important is how we go about achieving results—with honesty and respect, without taking shortcuts, and by operating ethically and with integrity in all that we do.

To help guide and align our behaviours as we make business decisions that impact our daily operations, we rely on our **Code of Conduct**, which outlines our values and describes our standards for conduct and compliance. It supports our continuing commitment to honest and ethical conduct and compliance with both the letter and the spirit of all provisions and regulations, and our company's policies, standards, and procedures.

Use our values and this Code as guides whenever you have a question regarding our operations. For additional guidance, you can reach me direct.

Managing Director



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Our Values

“Our values guide our behaviour, and collectively, our behaviours determine how we are perceived as a company”.

We act with integrity and communicate honestly and openly:

- Deal with people and issues openly, directly and respectfully
- Take actions that are consistent with words
- Do the right thing even if unpopular
- Openly give, invite and receive guidance and feedback

We are passionate about meeting our customers’ needs and delivering an excellent service:

- Demonstrate a passion for understanding and meeting the needs of our customers, clients and their customers
- Take active responsibility for the quality of service we provide to customers and others
- Are open to change and readily implement better ways of doing things
- Have high performance expectations and a mindset of excellence
- Are innovative in identifying new opportunities and approaches for our customers and ourselves

We are accountable for all of our own actions: these include safety, protecting the environment, and supporting our communities:

- Maintain an absolute commitment to safety for ourselves and others
- Take accountability for actions, decisions and results vs. blaming
- Demonstrate through actions a commitment to the well-being of the community and the environment
- Can be counted on to deliver and meet goals and objectives
- Have a “can do” attitude and bias for action

We work together as a team and are committed to excellence and innovation:

- Take ownership of team goals and are accountable for own part in the process
- Promote teamwork among groups; discourage “we vs. they” thinking
- Listen to input from teammates to reach the best solution
- Hold ourselves and others accountable for results
- Work to create partnerships and to collaborate across functions

We respect each other and celebrate our diversity:

- Treat fellow employees and customers with respect
- Appreciate and value each other and our diverse backgrounds and life experiences
- Effectively collaborate as a member of a diverse team; seek out diversity of thought

Our Work Decisions

Use the “**STAR**” method to make work decisions:

Stop, Think, and Act Responsibly.

Stop, Think, & Act

Responsibly

Apply HawkEye Drone Services Ltd values to all work decisions. Deal fairly with HawkEye Drone Services Ltd customers, suppliers, competitors, and employees. Don't take unlawful advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other practice involving unfair dealing.

Never knowingly violate laws, regulations, policies, standards, or procedures, even if you think doing so would lower costs, increase earnings, or satisfy a customer. Ensure awareness of the requirements associated with each individual flight specification. Your supervisor can't order you to take an action that intentionally violates this Code, a law, a regulation, or a company policy, standard, or procedure.

Ensure our decisions and actions do not give the appearance of impropriety. Consider how our actions and decisions will be perceived by others. If unsure, seek opinions of others, such as other commercial drone pilots.

Use this decision-making checklist:

- Have I verified the significant facts?
- Is it legal and ethical, and does it meet our internal requirements?
- Will my actions impact personal, client/customer or public safety?
- Have I made a decision that feels right and is fair and just?
- How would it look in a newspaper or on the Internet?
- How would my decision or actions be judged by others?
- Will I feel comfortable with my decision?
- If I'm not sure of something, have I asked for advice?

Introduction

This Code of Conduct establishes a set of standard expectations for all our Directors and Pilots conduct. Not to engage in any on-duty conduct that would impair our job performance, cause damage to HawkEye Drone Services Ltd, clients or public property, jeopardize our safety or the safety of others, or negatively affect HawkEye Drone Services Ltd reputation or image.

Compliance Obligations

'We' are responsible for knowing and complying with the requirements applicable to our work activities, including those described in this Code and those described in company guidance documents (policies, standards, procedures and manuals).

Adherence To The Code Of Conduct

HawkEye Drone Services Ltd strives to demonstrate the highest standards of ethical conduct. The company does not grant waivers to its conduct or compliance standards.

Discipline

Failure to comply with this Code or company guidance documents may result in disciplinary action, suspension or termination of licence. Discipline decisions can vary depending on the severity of the misconduct and the pilots disciplinary record, years of service, and job duties.

There are some serious violations of the Code that may result in termination including:

- Improper use of alcohol
- Acts or threats of violence
- Accessing or storing sexually suggestive or explicit materials using company assets, including computers, mobile phones or other electronic devices
- Falsification of company records

On safety matters, HawkEye Drone Services Ltd takes a behaviour-based approach to discipline. Discipline is considered only when a pilot acts in a reckless manner, demonstrates a pattern of carelessness or non-compliance, puts the clients/customers, co-workers or the public at risk by intentionally violating the Code of Conduct.

Raising Concerns

We are all expected to communicate honestly and openly with supervisors and others in leadership positions and, in good faith, raise concerns—including those about safety, possible misconduct, and violations of laws, regulations or internal requirements.

When concerns are raised, Managing Director and other leadership positions are expected to:

- Listen to understand
- Take concerns seriously
- Take any appropriate action in response to investigation findings
- In a timely manner, follow-up raised the concern

How to Raise Concerns

If you encounter questionable activities concerning HawkEye Drone Services Ltd, immediately bring them to HawkEye Drone Services Ltd attention by contacting directly.

Investigations

HawkEye Drone Services Ltd takes allegations of misconduct seriously and takes appropriate action. All reported violations of the Code of Conduct are investigated by one or more of the following:

- Company Directors
- CAA
- Corporate Representatives

Never obstruct or fail to cooperate with an investigation.

Employee Conduct Standards

Safety

The safety of the public, employees and contractors is our highest priority. The company's commitment to a safety-first culture is reinforced with our Safety Principles and HawkEye Drone Services Ltd Safety.

Safety Principles

Nothing is more important than public and employee safety.

We must create an environment at HawkEye Drone Services Ltd where employees feel free to raise all safety-related issues without peer pressure or fear of reprisal. This includes near hits and unsafe situations of any kind.

We must encourage open and honest communication on safety, so that we identify and eliminate unsafe situations and avoid incidents and injuries.

To enhance safety and prevent future incidents, we will adopt a voluntary non-punitive self-reporting system for unsafe occurrences and hazardous situations.

We acknowledge and reward safe behaviour and practices to encourage our employees and to reinforce continuous learning.

HawkEye Drone Services Ltd takes a behaviour-based approach to discipline. Discipline is considered only when an employee acts in a reckless manner; demonstrates a pattern of carelessness or non-compliance; puts the employee, co-workers or the public at risk by intentionally violating the Code of Conduct.

HawkEye Drone Services Ltd Safety Commitment

- We will train, equip and qualify our people to work safely.
- We will identify and address the underlying causes of incidents to prevent them from recurring.

Computer and System Security

Managing Directors are responsible for ensuring the security of HawkEye Drone Services Ltd.

Do these:

- Use only approved, authorized and properly licensed software on HawkEye Drone Services Ltd computer systems.

Don't do these:

- Don't share passwords or other access credentials with any other person or group, and don't use another person's password.
- Don't store inappropriate or pirated content on company equipment.

Social Media

These days, the reach of social media is wider than ever. While social media can help HawkEye Drone Services Ltd build and strengthen relationships with our customers, employees and community members, it also has the potential to negatively impact the public's perception of HawkEye Drone Services Ltd or your personal or professional reputation.

When we refer to social media activity, it includes:

- all types of posts and other communications on the Internet;
- posts on social networking sites such as Facebook, Twitter and LinkedIn;
- blogs and other online journals and diaries;
- posts of video or audio on media-sharing sites, such as YouTube or Flickr.

Social media activity also includes permitting, or failing to remove, posts by others where the employee can control the content of posts, such as on a personal page or blog.

HawkEye Drone Services Ltd respects 'all's' right to participate in social media and understands that your time outside of work is each's your own. HawkEye Drone Services Ltd also values its established brand reputation and goodwill relationships, which are important corporate assets.

If you engage in social media activity that identifies you as a HawkEye Drone Services Ltd employee, or your work at HawkEye Drone Services Ltd, even if done off premises and while off-duty, you could affect HawkEye Drone Services Ltd reputation and that of our clients.

Do these:

- Recognize that social media activity is subject to relevant HawkEye Drone Services Ltd policies, standards, and procedures. This includes but is not limited to, this Code of Conduct as well as requirements for protecting confidential information.
- Feel free to visit or participate on HawkEye Drone Services Ltd -sponsored social media sites. All participation on these sites is purely voluntary.

Don't do these:

- Don't represent in any social media content that you are authorized to speak on behalf of HawkEye Drone Services Ltd, or that HawkEye Drone Services Ltd has reviewed and approved your content, without the prior written approval of External Communications.
- Don't post photographs or video of the non-public areas of a client's premises, or of processes, operations or products without HawkEye Drone Services Ltd prior written approval.

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Company Records

When we do our work, we generate, receive, and use, company information. Information is created every day. Each employee must manage HawkEye Drone Services Ltd information carefully and responsibly, and be accountable for identifying records from information. Company records must be stored, managed and disposed of in accordance with specific Company procedures.

Supplier information includes pricing and contract information.

- Never disclose supplier information to a third party without appropriate approval and a legitimate business reason.
- We must comply with any nondisclosure agreement or the confidentiality provisions of an applicable supplier/vendor agreement.

Community Activities

HawkEye Drone Services Ltd is committed to supporting the communities we serve in various ways, such as encouraging our employees to volunteer and providing shareholder- funded financial contributions to community organizations.

HawkEye Drone Services Ltd does not support organizations that, in their bylaws, policies, or practices, discriminate on the basis of race, colour, religion, age, sex, national origin, ancestry, physical or mental disability, medical condition, veteran status, marital status, pregnancy, sexual orientation, gender identity, gender expression, genetic information, or any basis prohibited by law.

News Media Inquiries

Immediately refer any media inquiries to the Managing Director or approved representative available 24 hours a day, seven days a week to respond to the news media.

If the media asks to speak with a HawkEye Drone Services Ltd subject matter expert, Managing Director coordinates on behalf of HawkEye Drone Services Ltd. Under no circumstances are contractors permitted to represent themselves to the media as speaking on behalf of HawkEye Drone Services Ltd or our clients unless they are expressly authorized by the Managing Director.

In the case of an emergency, reporters arriving on the scene will try to gather information from any available source. If forced by the situation to respond to reporters, do not attempt to improvise an answer, do not speculate, and do not downplay the seriousness of the situation. Direct all reporter inquiries to company Managing Director and, if they are not on the scene, then to

the 24-hour media line 07399983373. Let them know that your priorities are to focus on safety for our customers and on completing the work.

Investor Inquiries

Questions about shareholder accounts and other administrative matters should be directed through our website and or to our Registered Office: 23-27 King Street, Bedfordshire. LU1 2DW.