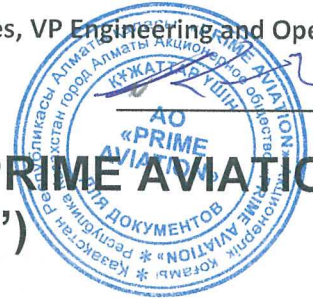


CONDUCT AT WORK POLICY OF PRIME AVIATION JSC (the “Company”)



This Policy is issued with the aim to establish a principle that all employees have a right to work in a business environment free from discrimination and harassing conduct, including sexual harassment. Discrimination on the basis of an employee's (colleague's) nation, region, religion, language, ancestry, age, disability, sex, marital status, sexual orientation is prohibited between members of the staff of the Company under this Policy.

This Policy is issued to all employees of the Company for further awareness. The Policy is included in Q Pulse software and each employee of the Company must be familiar with the provisions of this Policy.

Under this Policy all employees are responsible for ensuring that the workplace is free from any type of discrimination or harassment. The Company will not tolerate offensive or inappropriate behaviour at work. All employees shall avoid any action or conduct, which could be viewed as harassment.

Some examples of harassment:

Verbal:

Jokes, insults and innuendoes (based on race, sex, age, disability, etc.), degrading sexual remarks, referring to someone as a babe; whistling; cat calls; comments on a person's body or sex life, or pressures for sexual favours.

Non-Verbal:

Gestures, staring, touching, hugging, patting, blocking a person's movement, standing too close, brushing against a person's body. The display of sexually suggestive or degrading pictures, derogatory video or drawings, electronic transmission or the use of social media for this purpose.

Sexual harassment

Sexual harassment includes unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexually harassing nature.

Claim and Investigation

Any employee who has a complaint of harassment at work by anyone, should first clearly inform the harasser that his/her behaviour is offensive or unwelcome and request that the behaviour stop. If the behaviour continues, the employee shall immediately bring the matter to the attention of HR Manager or his/her direct Manager. Reports are acceptable in written or verbal forms, by e-mail or phone or written explanation of situation. The HR Manager and the direct Manager are obliged to maintain confidentiality at all times.

An investigation will be conducted by the Conduct Review Board of the Company. Involved parties will be afforded an impartial hearing and the opportunity to state their case. If the investigation supports charges of discrimination or harassment, disciplinary action will take place and may include termination of employment.

If you have any questions regarding this Policy, please contact the HR Manager.