

## **Skytruck Air/Sea Transport Inc. – Anti-Bribery Policy**

Skytruck Air/Sea Transport Inc. (the Company) maintains an Anti-Bribery Policy prohibiting any improper or unethical payment to government officials anywhere in the world by any Company officer, employee or agent of the Company.

No Company officer, employee or agent has the authority to offer payments of money or anything else of value, whether directly or indirectly, to a government official to induce that official to affect any governmental act or decision in a manner that will assist the Company or any of its subsidiaries or divisions, or any of its associates or agents, to obtain or retain business.

Every Company employee and agent has the obligation to record accurately and fairly all of their transactions involving any expense of the Company or any other transaction involving the disposal or transfer of Company assets.

The Policy extends to all Company operations anywhere in the world, including all subsidiaries, divisions, agents, consultants or other representatives, as well as to any joint venture or other business enterprise in which the Company is a participant.

### **Penalties**

Violations by any Company associate of the U.S. Foreign Corrupt Practices Act (FCPA) or local anti-bribery laws will result in corrective action, including possible termination of such employee's employment with the Company. Violations by any Company employee or agent can also result in severe penalties for both the Company and such individuals under the FCPA and any other local anti-bribery laws.

The FCPA specifically prohibits a company from reimbursing an officer, director, stockholder, employee, or agent for fines imposed for violations of the FCPA, so any fines for violations for which you are responsible will be paid from your personal assets. In addition, the Company will cooperate fully with law enforcement authorities in the investigation and prosecution of alleged violations of anti-bribery laws.

### **Prohibited Payments to Government Officials**

No Company employee or agent may promise, offer or pay money or give anything else of value to a governmental official in order to:

- influence any act or decision;
- cause the official to commit or omit any act in violation of his or her lawful duties;
- secure any improper advantage;

or induce the official to use his or her influence to affect any act or decision of a government, in order to assist the Company (or such associate or agent) in obtaining, retaining or directing business.

In addition to direct payments of money, other examples of prohibited payments to a government official would include:

- excessive gifts, or travel and entertainment expenses for government officials;
- contributions to any political party, campaign or campaign official;
- and charitable contributions and sponsorships made at the direction, or for the benefit, of a government official.

The following persons are considered "government officials":

- officers and employees of any government, department, agency, bureau, authority, instrumentality or public international organization;
- persons acting in an official capacity on behalf of a government;
- employees of entities that are owned or controlled by a government;
- and candidates for political office.

Prohibited payments apply to payments to any government official, regardless of rank or position.

## **Areas of Concern**

The following situations, among many other situations, could expose the Company and the individuals involved to a risk of a violation, and need to be reported as set forth below:

- Requests or demands by a government official for a bribe.
- Requests or suggestions by a government official that the Company make a charitable donation to a particular charity.
- Requests by a government official for employment either on his or her own behalf or on behalf of another.
- A government official with whom the Company is dealing has a reputation for receiving questionable payments.
- A demand or strong suggestion by a government official that a particular local representative should be retained for any purpose.
- A non-governmental person with whom the Company is dealing has a known family or other significant relationship with government officials.

- A request for an unusual or excessive payment, such as a request for over-invoicing, unusual up-front payments, unusual commissions, a request for payments to be made to a third party (or to a third country), to a foreign bank account, in cash or otherwise untraceable funds.
- A proposed agent or representative has little or no expertise or experience in the area (whether geographic, professional or otherwise) in which it will represent the Company.
- A proposed agent or representative refuses to provide written assurances that he or she will not make any improper payments.
- A proposed agent or representative with whom the Company seeks to do business requests an unusually high commission.
- A proposed agent or representative with whom the Company is conducting business fails to provide standard invoices.
- A potential governmental customer requests an unusual credit or rebate with or from the Company in return for its business.

Unusual bonuses or other amounts paid to agents or representatives of the Company.

## **Reporting Violations**

Any transaction, no matter how small or seemingly insignificant, that might give rise to a violation of this Policy must be reported promptly by calling the Company's President at 718-528-4200 or by sending a detailed e-mail to [rolfg@skytruck.com](mailto:rolfg@skytruck.com).

Your calls, detailed notes and/or emails will be dealt with confidentially and only by those recipients who have a need to know for the sole purpose of carrying out the necessary investigations and follow-up.

As long as a report is made honestly and in good faith, you have the commitment of the Company and of the Company's Board of Directors that you will be protected from retaliation and that your rights will be enforced.

## **Administration of Policy**

The President and Chief Executive Officer, who will be responsible for reporting any violations of the Anti-Bribery Policy to the Company's Board of Directors, will administer the Policy.