

Southern Air, Inc.

Code of Ethics

The purpose of this ethics policy is to communicate Southern Air, Inc. values and outline Company expectations of employees and business partners. This policy shall apply to all employees of and business partners associated with Southern Air, Inc.(herein referred to as “the Company”). Southern Air, Inc. is committed to the highest standards of social and business practices. All employees of and business partners associated with Southern Air, Inc. are expected to observe the highest possible standards of integrity as they conduct day to day operations, complying with all applicable Local, State and Federal laws, regulations and rules.

Employees are expected to read, understand and comply with this policy at all times. It is the responsibility of the employee to ask for clarification if anything in this policy is not clear. This policy is designed to be a guideline and cannot cover every possible situation which may arise in day-to-day operations of the Company. Employees should ask Management about situations which are not directly covered by this policy. Employees are expected not only to comply with this policy but also to report known violations to Management.

Discrimination

Southern Air, Inc. is an equal opportunity employer and shall treat all employees and partners fairly. The Company does not discriminate on the basis of age, color, religion, disability, race/ethnicity, veteran status, gender or marital status.

The Company shall not tolerate harassment of or discrimination against any employee, applicant for employment or business partner by an employee or business partner in the workplace or on Company jobsites.

Conduct

The Company’s policy is to maintain a work environment free from all forms of harassment, discrimination and inappropriate conduct and to insist that all employees and business partners be treated with dignity, respect and courtesy. Employees are expected to conduct themselves in a professional manner at all times when conducting Company business. Any conduct that fails to show appropriate respect to others including fellow employees, customers, and suppliers violates the Company’s values. The following are examples of unacceptable conduct: insults, threats, intimidation, profanity, ridicule, vulgarity, discrimination, harassment, physical or verbal abuse, sexually explicit humor, conversation, or behavior, gossip, slurs or stereotyping, unwelcome sexual advances, unwelcome touching or invasion of personal space, ignoring the rights of others, and insensitivity to the beliefs and customs of others. Any act that involves theft, fraud, embezzlement, or misappropriation of any property, including that of Southern Air, Inc. or any of its employees, suppliers, or customers, is strictly prohibited. Activities conducted on behalf of the Company must reflect the standards of honesty, loyalty, trustworthiness, fairness, accountability and concern for others.

Southern Air, Inc. encourages employees to do the right thing. This includes reporting all violations of the law or of Company policies. Management will investigate all such reports and will take appropriate action. Retaliation against any employee for the good faith reporting of a suspected violation or for participating in any investigation of a suspected violation will not be tolerated

Health and Safety

Southern Air, Inc. is committed to providing a safe and healthy environment for its employees and business partners. The Company recognizes that a healthy and safe workplace comes from a culture of minimizing risk through employee training, effective and consistently applied policies and procedures, and leadership support through all levels of the Company. The Company and employees together will ensure that all Southern Air, Inc. equipment and machinery is operated within manufactures parameters and is maintained and kept in good working order. The Company strictly prohibits the use of any illegal substances or the consumption of alcohol by the employees and business partners in the workplace and on all Company job sites.

Hiring Third Parties

Sales agents, consultants, independent contractors, temporary workers and suppliers of the Company are expected to observe the same standards of conduct as Southern Air, Inc. employees when conducting business with or for the Company. No employee may indirectly or through agents, do anything the employee is prohibited from doing hereunder. Integrity is a key consideration for the selection of subcontractors and vendors. Thorough due diligence shall be conducted before retaining any sales agent, consultant, representative, independent contractor, external temporary worker or supplier.

Product Safety

Southern Air, Inc. provides quality products and services that are designed and installed to meet applicable industry standards, codes, regulations, laws and contractual requirements. The Company strives to ensure that all products and services are safe for its customers and the public. Delivering our products and services in this manner fulfills the Company's commitment to its core values while also enhancing the Company's competitive position in the marketplace and inspiring the confidence of its customers.

Confidentiality

During the course of day-to-day business employees and business partners of Southern Air, Inc. are exposed to information that is considered confidential to the Company. Confidential information includes, but is not limited to, strategic plans, sales data, customer lists, financial information, product designs, information regarding negotiations with suppliers and customers, agreements or dealings with suppliers and customers, business operations and processes, personal and company related employee information, software, trademarks, and similar information from customers or suppliers. Disclosure of any confidential information could result in significant damage to the Company and its ability to conduct

business. Disclosure of confidential information to any person or organization, directly or indirectly, without prior written consent from the Company is prohibited. Using confidential information for commercial or other purposes other than conducting Company business is prohibited and may be illegal. The responsibility to maintain the confidentiality of company information survives an employment termination or the termination of a supplier agreement.

Accurate Records & Reports

Every employee of Southern Air, Inc. has the responsibility to maintain accurate and complete records and reports. Employees may not make any false statements, misleading or artificial entries, or material omissions or misrepresentations in any of the company books, financial records, or other documents or communications. All financial transactions shall be fully and completely documented and recorded in the Company's accounting records. Any report, document, or statement submitted to the government or communicated publicly must be accurate, complete, and timely. Safeguarding the Company's assets and records is the responsibility of all employees and representatives. Employees should use and maintain assets with care and respect, while guarding against waste and abuse.

Privacy

Southern Air, Inc. is committed to respecting the privacy rights of its employees and customers. The Company has implemented a standard of limited access and a variety of security measures to maintain the safety of personal and confidential information. It is the responsibility of every employee to respect and maintain the privacy of Southern Air, Inc. customers and fellow employees. Employee and customer information should not be used for personal benefit or for the benefit of others.

Outside Business Interests

Southern Air, Inc. recognizes and respects the rights of employees to take part in financial, business, employment, or other activities outside of their jobs with the Company. These activities must be lawful and free of any potential conflicts with employees' responsibilities with the Company. A conflict of interest arises when an employee uses his or her position at Southern Air, Inc. for personal gain or when the employee's personal interests conflicts with or is put ahead of the Company's interests. All employees must avoid any actions or relationships that could conflict with, or appear to conflict with, the interests of the Company. Examples of conflicts of interest include but are not limited to:

- Accepting or offering payments, gifts or favors from or to companies doing business with the Company
- Taking personal advantage of opportunities you discovered through the use of Company property, information, or position
- Using the Company's name, reputation, information or assets for personal gain
- Any outside business interests that affect an employee's job performance with Southern Air, Inc.
- Directly or indirectly working for a competitor of the Company

It is the responsibility of the employee to advise company management of any potential or actual conflicts of interest and to consult management if it is unclear whether a situation is considered a conflict of interest.

Non-Solicitation

Under no circumstance should an employee or partner of Southern Air, Inc. at any time present or solicit a bribe to or from any third party to coerce business for or with the Company or for personal gain. Any employee found offering or soliciting bribes to or from any third party will face disciplinary action up to and including termination. Any business partner found offering or soliciting bribes will no longer be allowed to conduct business with the Company.

Antitrust & Competition

It is Company policy to compete fairly and vigorously. All employees must comply with antitrust and competition laws. All product and service development, manufacturing, purchasing and sales efforts must conform to the highest ethical standards. Antitrust laws prohibit agreements or understandings among actual or potential competitors to fix or control prices, fix bids, or boycott specified suppliers or customers, or limit the production and sales of product lines. Other laws prohibit controlling the resale pricing of distributors and dealers, publicly disparaging a competitor, misrepresenting Company products or services, stealing trade secrets or offering or paying bribes or kickbacks.

Compliance with Applicable Laws

All employees and business partners of Southern Air, Inc. shall, at all times act, in accordance with the laws, rules and regulations of the governing jurisdictions in which Southern Air, Inc. conducts business.

Violations of Code of Ethics

Any violation of this Code of Ethics by any employee of Southern Air, Inc. is grounds for disciplinary action up to and including dismissal. Any violation of this Code of Ethics by a business partner may lead to disassociation from the Company.