COBI

Bristow

CODE OF BUSINESS INTEGRITY

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MESSAGE FROM THE CEO

TO ALL EMPLOYEES OF BRISTOW AND ITS WORLDWIDE SUBSIDIARIES, AFFILIATES, AND CONTROLLED JOINT VENTURE COMPANIES

Among Bristow's most cherished assets are Our Core Values - Safety, Integrity, Passion, Teamwork, and Progress. Our Core Values and the Code of Business Integrity (COBI) have been integral to our culture and success. Conducting our business in a manner consistent with our Core Values and COBI enables us to win and keep the trust and confidence of our clients, regulators, and other stakeholders.

Stakeholder confidence is earned every day, with every action we take. Protecting our reputation is everyone's job, and COBI will help all of us comply with the law and maintain the highest standards of ethical conduct.

I ask each of you to read COBI carefully and think about how our Core Values underscore and guide your everyday decisions and actions on the job. If you are unsure of what constitutes proper conduct or believe you are in a situation that may violate, or lead to a violation of, COBI, please follow the outlined reporting procedures. I also ask you to be proactive in reporting any possible breaches of our Core Values and COBI.

In addition to each of us being personally accountable for compliance, managers and supervisors have a particular responsibility to foster a culture in which living our Core Values is central to the way we conduct our business. Our leaders are responsible to ensure their teams are trained in all five Core Values and COBI.

Thank you for your commitment to helping us to grow, fulfill our responsibilities to our stakeholders, and continue to enjoy an outstanding reputation.

Chris Bradshaw
Bristow Group President and CEO

SAFETY • INTEGRITY • PASSION • TEAMWORK • PROGRESS

INTRODUCTION

COBI provides a framework to guide your behavior. It is not designed to address every compliance situation that you may encounter. Rather, COBI is designed to supplement your judgment, common sense, and knowledge of what is right and wrong. You should avoid any circumstances that would violate the letter or spirit of COBI. When in doubt, consult additional resources such as the Compliance Department, Bristow's policies and procedures or the contacts mentioned throughout this booklet.

As a global organization, we are subject to the laws and regulations of different countries. COBI forms the principles for conduct expected by our Company. Where local customs, laws, or regulations differ from COBI, you should apply whichever sets the highest standard of behavior. If you are in doubt, always seek assistance before proceeding.

YOUR RESPONSIBILITIES AS AN EMPLOYEE:

- *Understand and comply with COBI and Bristow's policies and business practices.*
- *Conduct business according to the highest legal and ethical standards.*
- *Report concerns of known or suspected misconduct immediately.*
- *Seek guidance from your supervisor, the Chief Ethics and Compliance Officer, Legal Department or HR if you have questions.*

IN ADDITION, COBI IMPOSES HEIGHTENED EXPECTATIONS ON SUPERVISORS. THOSE WHO SUPERVISE OTHER EMPLOYEES ARE EXPECTED TO:

- *Lead by example in promoting ethical behavior.*
- *Ensure that your team members understand COBI's requirements and have the resources they need to comply.*
- *Hold your team members accountable for performing to the highest legal and ethical standards.*
- *Encourage employees to speak up and seek guidance when needed.*
- *Respect your colleagues and treat all employees fairly.*

WAIVERS

COBI applies to Bristow Group Inc. and its subsidiaries, certain affiliates, and controlled joint ventures ("the Company" or "Bristow") and to all employees, officers, and directors of the Company. We all must comply with COBI. There will be no waiver of any part of COBI, including for any director or officer, except by a vote of the Bristow Board of Directors or a designated Board committee that must first determine whether there is a clear showing that a waiver is in the best interests of the Company. In the event that a waiver is granted to a director or officer, the notice of such waiver shall be promptly disclosed in accordance with applicable laws, rules, and regulations.

TRAINING

In order to promote awareness and understanding of various compliance topics and risk areas, the Company utilizes both in-person and online training. Training topics include COBI, anticorruption, data privacy and protection, and trade compliance, among others. Training is a critical part of Bristow's compliance program, and completion of training courses is mandatory.

Because supervisors play an important role in ensuring that their team members understand COBI, company policies, expected standards of conduct and any other requirements that are applicable to their teams, supervisors receive periodic reports that include the names of their team members who have not completed required training courses.

ACKNOWLEDGEMENT

Employees are required to acknowledge understanding of and compliance with COBI upon hire and every other year thereafter.

OVERSIGHT AND MONITORING

Bristow's Compliance Committee is chaired by the Chief Ethics and Compliance Officer and is composed of members of the Executive Leadership Team, the Chief Information Security Officer, and the Director of Internal Audit. The Committee meets at least quarterly and has oversight responsibility of the Company's compliance and ethics program. The Committee's primary responsibilities are to understand and support business integrity and compliance initiatives and to ensure compliance with COBI, policies, and applicable laws. Reports from this Committee are presented at the first meeting of the Audit Committee of the Board that occurs thereafter.

WHERE TO FIND FURTHER INFORMATION

COBI and other related policies are available online through the Company's intranet page under the Content Hub tab.

Any questions regarding the content or application of these policies should be directed to the Chief Ethics and Compliance Officer at compliance@bristowgroup.com.

SPEAK UP

If you have a concern or suspicion regarding potentially improper activity, don't keep it to yourself. As stated in the Reporting Concerns and Nonretaliation Policy, Bristow employees are required to report any suspected violation of COBI, company policies, the law or expected standards of conduct. You do not have to be certain that a violation has occurred; a good faith belief that a violation could have occurred is sufficient.

IF YOU ARE UNSURE WHETHER TO SEEK GUIDANCE OR RAISE A CONCERN, ASK YOURSELF:

- Are your actions legal?
- Are your actions consistent with Bristow's Core Values?
- Do your actions comply with COBI and other Bristow policies?
- What would others, including the public, think about your actions?

You are encouraged to discuss concerns with appropriate supervisory personnel, the Chief Ethics and Compliance Officer, the Legal Department, or HR. If you prefer to remain anonymous or are not comfortable engaging one of the appropriate persons mentioned above, please report your concerns through the Bristow Ethics and Compliance Hotline.

(888) 840-4147 U.S. ONLY

The Hotline is staffed by an independent third-party organization, operating 24 hours a day, seven days a week. You may choose to remain anonymous - you do not have to share your identity.

(770) 582-5277 NON-U.S. ONLY

If you are calling from outside of the U.S., tell your local telephone operator that you would like to place a reverse charge call to the U.S. (available in most countries). If the operator requires your name to place the call, but you choose to remain anonymous, you can say "Bristow."

HTTPS://BRISTOWGROUP.TNWREPORTS.COM

You may also access the Hotline through the Company's intranet page or, alternatively, at the address above. Again, you may choose to remain anonymous.

You also have the option of sharing your concerns by mail:

Chief Ethics and Compliance Officer
3151 Briarpark Drive
7th Floor
Houston, TX 77042 USA

Chairman, Audit Committee
c/o Corporate Secretary
3151 Briarpark Drive
7th Floor
Houston, TX 77042 USA

We strive to investigate all concerns promptly and fairly, and all reported concerns are presumed to be made in good faith.

Please understand that it may be difficult or impossible for Bristow to thoroughly investigate reports that are made anonymously. So if you decide to remain anonymous, please include in your report as much detailed information as possible, and please also make sure to visit the Ethics and Compliance Hotline to answer any questions that the investigators may have left for you.

NON-RETALIATION

Bristow will not tolerate any form of retaliation against employees who make good-faith reports and/or participate in investigations for known or suspected ethical or legal misconduct. If you believe you or others have been subjected to retaliation, you should immediately notify HR, the Chief Ethics and Compliance Officer, the Legal Department, or the Bristow Ethics and Complaince Hotline. For more information, see the Reporting Concerns and Nonretaliation Policy.

BRISTOW CONNECTS THE LINES.

SAFETY, RELIABILITY, PERFORMANCE. YOURS AND OURS.

DEMONSTRATING INTEGRITY TO ONE ANOTHER AND OUR COMMUNITIES

THIS SECTION CONTAINS GUIDANCE ON THE FOLLOWING:

Target Zero, Employment Practices, Human Rights, Substance Abuse (Drugs and Alcohol)

TARGET ZERO

Safety is a Core Value. It's also everyone's responsibility. What is our Target Zero safety vision? Zero accidents and zero harm. Our customers expect it. Our shareholders expect it. Your loved ones expect it, and so should you. Target Zero is more than a vision - it's Bristow's commitment and rallying cry. It's also our common global framework for talking about safety at Bristow.

To achieve Target Zero, we all need to be safety leaders – every day.

TARGET ZERO

WHAT SHOULD I DO?

- Be responsible for your own safety and the safety of your fellow workers.
- Fully understand all regulations, policies, and procedures that apply to the work you do.
- Take every opportunity to participate in safety improvements.
- Raise your own safety awareness as well as the safety awareness of others.
- Challenge unsafe acts and conditions, and exercise your authority to *Stop Work*, if necessary.
- Ensure that everyone on your team is aware of potential hazards and our safe system of work before starting any work.
- Notify your supervisor of any hazards or threats to a safe environment, and promptly submit a report via the BeSAFE system.

QUESTION

While refueling a helicopter that is scheduled for an upcoming flight, John notices a small crack in the tail boom. What should John do?

ANSWER

John should immediately use his Stop Work authority. At Bristow, each of us has a right to stop a flight or other work if we observe an unsafe situation. In the unlikely event that John is unable to exercise his Stop Work authority, he should promptly report the situation to his line manager, the head of flight operations, a safety manager, a local HR representative, or the Legal Department. Bristow will protect him from retaliation.

The aviation industry is highly regulated. Bristow and its employees are bound by federal, state, and local laws, as well as the laws of other countries where we operate. It is critical that we follow these laws and regulations. You are responsible for knowing and adhering to applicable laws and regulations that apply to your position.

EMPLOYMENT PRACTICES

At Bristow, we strive to promote an environment that is inclusive of all people and their unique abilities, which requires that we treat everyone – our colleagues, customers, suppliers, and other business partners – with respect and dignity. Accordingly, we do not tolerate any forms of discrimination or harassment based on race, color, religion, sex (including pregnancy), sexual orientation, gender identity, ethnicity or national origin, citizenship, age, marital status, veteran status, genetic information, and disability.

These principles and requirements also apply to the recruiting and hiring of new employees, and to developing, promoting, and compensating current employees. In other words, we hire and retain employees based on their abilities, achievements, experience, and performance.

A few examples of harassment include:

- Unwelcome remarks, gestures, or physical contact;
- Display or circulation of offensive, derogatory, or explicit images;
- Racial/ethnic slurs or offensive jokes (explicit or innuendo);
- Bullying/intimidation; and
- Verbal or physical abuse or threats.

If you feel that you have experienced, witnessed, or heard of incidents of unequal treatment or harassment in violation of our policies, you must immediately notify your supervisor or HR representative or make a report through the Ethics and Compliance Hotline. Bristow will promptly investigate each report and take corrective action, as necessary. Anyone who makes a report or participates in an investigation will be protected against retaliation.

For more information, please refer to your region's Employee Handbook.

WHAT SHOULD I DO?

- Respect all coworkers, clients, consultants, and other business partners.
- Consider how your actions are perceived.
- Tell people if you find their actions offensive or hostile.

QUESTION

Sheila's line manager has asked her several times to meet for drinks after work. She has repeatedly told him that she is not interested. Recently, her supervisor stated that meeting up with him would go a long way toward a promotion. What should Sheila do?

ANSWER

The line supervisor's conduct makes Sheila feel uncomfortable and constitutes harassment. She should report the matter to her local HR representative, the Compliance Department, or the Ethics and Compliance Hotline. Bristow will protect her from retaliation.

- Report occurrences of discrimination or harassment to a supervisor, HR representative, or through the Ethics and Compliance Hotline.

HUMAN RIGHTS

As stated in our Sustainability report, Bristow seeks to play a positive role in the communities in which it operates by conducting itself in a way that respects human rights. Our operations and policies uphold the principles of the international human rights standards, including the U.N. Guiding Principles on Business and Human Rights.

Bristow is committed to:

• Providing fair and equitable wages, benefits, and other employment conditions in accordance with applicable laws;

• Recognizing employees' right to freedom of association and movement;

• Providing safe working conditions, free of danger and exploitation;

• Prohibiting forced or child labor; and

• Promoting a workplace free of discrimination and harassment.

Bristow also adheres to following various antislavery and human trafficking initiatives and laws, including the Modern Slavery Acts of the UK and Australia, and Norway's Transparency Act, and we encourage our business partners and suppliers to do the same.

In short, we promote a culture of ethical and lawful behavior consistent with COBI, our Core Values, and our policies.

FREEDOM OF ASSOCIATION

Bristow respects its employees' right to freedom of association, including the right to join or form trade unions and bargain collectively. The Company will neither favor nor discriminate against members of trade unions or similar external representative organizations.

SUBSTANCE ABUSE (DRUGS AND ALCOHOL)

We are committed to maintaining a safe and productive work environment free from the adverse effects of drugs and alcohol. Employees who work under the influence of drugs or alcohol represent a risk to coworkers, Company assets, the community at large, and to themselves. As a result, we do not tolerate the possession, purchase, sale, transfer, use, or presence in an employee's system of any prohibited drugs while on Bristow's premises, working on our behalf, or operating Bristow vehicles or equipment, including aircraft.

Aircrew, aviation, and safety-sensitive staff must present themselves in a fit state for work, meaning they must comply with airworthiness authority directives and applicable laws and regulations.

WHAT SHOULD I DO?

- Never possess, distribute, or be under the influence of alcohol or drugs while at work.
- Report any known or suspected use, possession, sale, or distribution of drugs or alcohol on Company premises or while working on the Company's behalf.
- Report anyone who you suspect may be under the influence of alcohol or drugs at work.
- Share with your immediate supervisor the use of any prescribed medication that could affect your performance.
- Do not allow the use of alcohol or drugs during non-working hours to negatively affect your job performance.

For more information, consult your HR Business Partner or see the Substance Abuse Policy.

Drugs include any substance, whether ingested, inhaled, or injected that has known mind-altering or function-altering effects upon the human body, or impairs one's ability to safely perform work as defined by applicable laws and regulations.

FINANCIAL INTEGRITY

THIS SECTION CONTAINS GUIDANCE ON THE FOLLOWING:

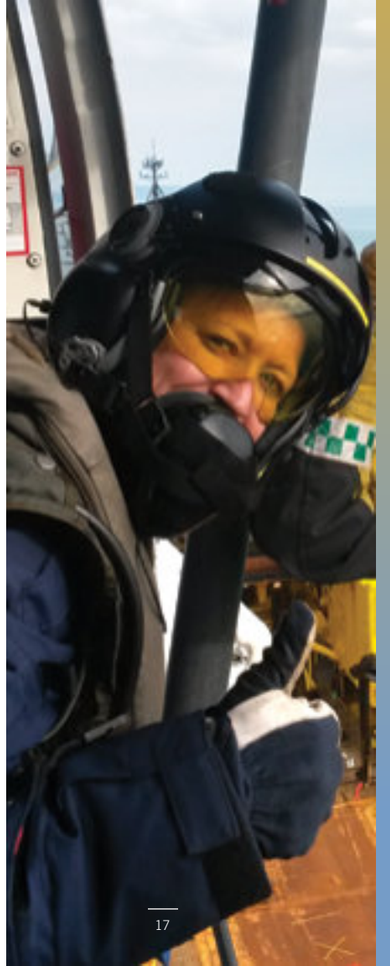
Accuracy of Company Records, Internal Financial Controls, Record Retention, Insider Trading, Taxes

ACCURACY OF COMPANY RECORDS

Our ability to make responsible business decisions depends upon the accuracy and integrity of our records. Our obligation to make accurate representations to our shareholders, government agencies, and others depends on compliance with this requirement. Accordingly, you must never hide, alter, falsify, or disguise the true nature of any business transaction.

Records contain information that is evidence of a business activity and can include inventory records, expense reports, accounting entries, time sheets, marketing data, and contracts.

Bristow is required to file reports and other documents with various regulatory authorities, including the U.S. Securities and Exchange Commission (SEC) and the New York Stock Exchange. Employees involved in the preparation and submission of these reports and other public disclosures must ensure that the information presented is full, fair, accurate, timely, and understandable. Inaccurate, misleading, or dishonest financial reporting can result in civil or criminal penalties for both the Company and the employees involved.



QUESTION

Toward the beginning of the financial quarter, a customer asks Emilio for an addendum to its existing contract to add additional services at a new location. In order to improve last quarter's results, Emilio considers dating the addendum two weeks prior. Can he do this?

ANSWER

No. This would be a violation of law and Company policy. Entering accurate sale dates is critical to reflecting true Company financial statements at quarter and year end. Inserting a date on a contract that mischaracterizes the true timing of the transaction violates our responsibility to create and maintain accurate books and records.

INTERNAL FINANCIAL CONTROLS

As a publicly traded company, we are required by law to ensure that:

- all transactions, assets, and liabilities have been properly recorded on a timely basis;
- all transactions have been authorized by management and made in accordance with applicable laws and regulations; and,
- Company assets are adequately safeguarded.

We must also ensure that all transactions, assets, and liabilities are recorded in accordance with U.S. Generally Accepted Accounting Principles (GAAP) and, where applicable, other local or statutory principles.

You should never structure or record any transaction, asset, liability, or reimbursement request, or engage in any other conduct, in an attempt to circumvent Bristow's system of internal controls.

For more information, please consult Internal Audit or the Legal Department.

RECORDS RETENTION

Company policy and applicable laws require that we retain certain records for specified periods of time. These records must be properly managed and disposed of when no longer needed. Please make yourself aware of retention guidelines prior to the disposal or destruction of any Company records.

Legal Holds: During litigation, threatened legal action, or government investigations, we may be required to prevent the destruction or alteration of records. You must not knowingly destroy or discard information that is subject to such a "legal hold." If government investigators or Company auditors, lawyers or management request information or documentation, we must cooperate by providing an accurate and complete response to the request.

For more information, see our Records Management Policy or contact Compliance@bristowgroup.com.

INSIDER TRADING

In the course of your work, you may have access to material, nonpublic information ("insider information") that relates to Bristow or its financial position. Examples include the gain or loss of a significant customer, planned mergers or acquisitions, financial results, negotiations with a potential business partner, or any other information that is considered confidential.

Employees who have insider information must keep it confidential and may not buy or sell Bristow securities (or derivatives relating to such securities) until at least 24 hours after the information has become public; provided, however, that such purchase or sale of Bristow securities must occur during an open trading period or, in the case of certain employees, only after receiving prior authorization from the Compliance Committee. You are also forbidden by law from providing insider information about Bristow to others who may trade on the basis of this information (also known as "tipping").

These prohibitions also apply to trading in the securities (or derivatives relating to such securities) of other companies about which you may gain insider information by way of your employment with Bristow.

Material, non-public, information includes any information that has not been disclosed to the public and that a reasonable investor likely would consider important in deciding whether to buy or sell a security. Examples of public disclosure include public filings with securities regulatory authorities and the issuance of company press releases. Whether you have material information does not depend upon your position in the Company -- it depends on what you know.

For more information, please see our Insider Trading Policy.

TAXES

It is Bristow's policy to pay all applicable taxes levied against us or our operations. In accordance with applicable laws, including US Internal Revenue Code and the UK's Corporate Criminal Offense, employees are prohibited from assisting any person or company, including our customers, joint ventures, or other employees, from evading any applicable taxes or committing tax fraud, including other related financial crimes. This prohibition applies to all jurisdictions in which Bristow operates.

FINANCIAL INTEGRITY – WHAT SHOULD I DO?

- Understand what a record is so that you can properly report, retain, and destroy it consistent with our Records Management Policy.
- Accurately record all expenses, assets, liabilities, and revenues in a timely manner.
- Do not conceal or mischaracterize the true nature of any business transaction.
- Abide by all internal controls.
- Report immediately any accounting or auditing irregularities, including incidents of suspected fraud.
- Do not trade or encourage others to trade securities or derivatives based upon material, nonpublic information.
- Cooperate fully with all litigation holds and investigations.

QUESTION

Lara uses the information that she acquires while working at Bristow to make personal investment decisions, including whether or not to purchase Bristow stock for her retirement account. Is this allowable?

ANSWER

Lara must be extremely careful that she is not trading the securities of any company, including Bristow, with the use of material information that has not been publicly disclosed. If she does, she could be violating insider trading laws and subject to civil and criminal penalties.

INTEGRITY IN BUSINESS DEALINGS WITH OTHERS

THIS SECTION CONTAINS GUIDANCE ON THE FOLLOWING:

Compliance with Laws, Anti-Corruption, Money Laundering, Gifts and Hospitality, Charitable Contributions, Political Contributions, Fair Competition, Export Controls and Other International Business Restrictions, Anti-Boycott Laws

COMPLIANCE WITH LAWS

We maintain the highest ethical standards and comply with all applicable laws and regulations when conducting Company business. You are prohibited from assisting any person or company, including customers and joint venture partners, in any activity that contributes to the violation of any law or regulation. Pay particular attention to the laws and regulations that are relevant to your role at Bristow. If unsure, seek guidance from an appropriate supervisor or the Legal Department.

ANTICORRUPTION

Bristow's values include integrity and fairness, and we expect the same of our third party business partners. Bribery and corruption are strictly prohibited and have no place in our business dealings or Company culture.

Many countries have enacted laws that prohibit the bribery of government officials. Laws including the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act apply to Bristow and it employees even when conducting business outside the United States and the United Kingdom. Bristow also prohibits commercial bribery – that is, the payment of bribes to non-government officials. Both individuals and companies are subject to severe penalties for violating antibribery laws, which can include significant fines and prison.

FOREIGN GOVERNMENT OFFICIALS

These include employees of stateowned or controlled enterprises such as national oil companies, officers or employees of any branch of government, representatives of public international organizations (such as the United Nations), political candidates, and the immediate family members of any such officials.

BRIBERY

*Providing **anything of value,** including cash, gifts, entertainment, or other favors, in order to secure an improper business advantage. Bribery can occur directly or indirectly, such as through a business partner or a family member of a government official.*

QUESTION

Who is covered by the U.S. FCPA and U.K. Bribery Act?

ANSWER

Employees, consultants, agents, and other parties acting on Bristow's behalf, regardless of their geographic location, are potentially subject to the FCPA and U.K. Bribery Act.

You must never offer, provide or promise to provide, to provide anything of value if the purpose of doing so is to:

- Influence someone's actions or judgment relating to our services.
- Gain improper advantage when selling our services.
- Influence a foreign government official's use of discretionary or non-discretionary authority.

Note that bribes and other improper payments are illegal whether they are made with Company funds or an employee's personal funds.

Although allowed under the FCPA, facilitation or "grease" payments are prohibited by Company policy and the laws of many of the countries in which we operate. These payments are made to accelerate routine government action, such as customs inspection or visa processing. The only circumstances under which an employee may make an otherwise improper payment to a government official is to avoid threats to health, safety or welfare. If such a payment is made, it must be promptly reported to the Chief Ethics and Compliance Officer and documented in accordance with our Anticorruption Policy.

Remember that the Company and its employees may be held legally responsible for any improper payments made by a third party acting on Bristow's behalf. For this reason, Bristow has instituted certain due diligence procedures that we must all follow when engaging business partners, sales agents, consultants, and other representatives.

QUESTION

Juanita is responsible for approving the invoices of a vendor that provides assistance with obtaining foreign work visas for Bristow employees. On one invoice, she notices an itemized charge of "cash" for $250. What should she do?

ANSWER

The purpose of the itemized charge is not readily apparent and could be evidence of a bribe paid to secure work visas for Bristow's benefit. Juanita should not approve the invoice. Instead, she should refer the matter to the Compliance Department or the Legal Department.

WHAT SHOULD I DO?

- Never offer, make or accept anything of value meant to improperly influence business decisions.
- Accurately record all transactions.
- Immediately report suspected bribery or corruption to the Compliance Department.
- Be alert for red flags that may indicate the payment of bribes by third-party business partners. For additional information, please consult our Anticorruption Policy and our Engaging Intermediaries Policy.
- Consult the Compliance Department with any questions.

MONEY LAUNDERING

Money laundering is the disguising of the origins of illegally obtained money so that the money appears to be legitimate. Bristow is committed to complying with all applicable anti-money laundering laws, rules, and regulations. We must conduct business only with reputable and legitimate partners. Pursuant to Bristow's Anti-Money Laundering Policy, you must avoid any transactions that are structured in a way that could be viewed as concealing illegally obtained funds or illegal conduct. For example, requests to make overpayments, attempts by business partners to make payments in cash or cash equivalents, or payments by someone who is not a party to a contract could be indications of money laundering. You should report any such suspicious transactions to the Legal Department.

QUESTION

George takes a customer to play golf on the average of once per week at a cost of USD 100.00 per round. He never seeks pre-approval from his managers. Is this allowable?

ANSWER

No. While the individual rounds of golf may be below the threshold requiring pre-approval, frequent hospitality with the same person requires such approval where it may give rise to an appearance of impropriety. Paying for a weekly round of golf with the same customer likely violates this standard.

GIFTS AND HOSPITALITY

Our philosophy is that business should be won or lost based solely on the merits of our services. We nevertheless recognize that building business relationships often involves the exchange of reasonable and customary gifts and hospitality. All gifts and hospitality given to any third party must be reasonably related to a clear business purpose and customary within that business relationship. The anticorruption laws referenced in the previous section are easy to violate inadvertently, Employees must be mindful when exchanging gifts and hospitality.

As stated in our Gifts, Hospitality and Charitable Contributions Policy, you should never offer or receive gifts or hospitality that would give rise to an appearance of impropriety, including those that are:

- Paid or received in cash or cash equivalents.
- Based on the quantity or volume of products or services to be purchased or sold.
- Offered in return for a specific decision or outcome – ("you scratch my back, I scratch yours.")
- Made with the expectation that it will influence a decision.
- Contrary to the law or the policies of the other person's employer.

Gifts are generally permitted if they are of nominal value, such as advertising trinkets bearing a Company logo – hats, T-shirts, pens, and similar items.

You may be required to obtain preapproval from your supervisor to give or receive gifts in excess of the amounts specified in the Gifts, Hospitality and Charitable Contributions Policy.

Similarly, hospitality (e.g., business meals) and entertainment (e.g., tickets to a sporting event) must be reasonable and not so frequent as to suggest a pattern.

You may be required to obtain preapproval from your supervisor to give host or attend a meal or event that exceeds the amounts specified in the Gifts, Hospitality and Charitable Contributions Policy.

Remember that it is not acceptable to repeatedly offer gifts and/or hospitality to the same recipient, even if each individual occurrence is of nominal or lower value.

As mentioned, there is inherent and heightened risk when providing anything of value to non-U.S. government officials. Employees are urged to review both the Gifts, Hospitality and Charitable Contributions Policy and the Anticorruption Policy prior to offering or providing gifts or hospitality to foreign government officials.

each individual occurrence is of low value. If in doubt, seek advice from the Chief Ethics and Compliance Officer.

You should not provide employees of the U.S. government with any gift or hospitality other than minimal refreshments during meetings (e.g., soft drinks or snacks with a retail value of $20 or less) unless prior approval is obtained from the General Counsel.

Regardless of value, remember that you must avoid any behavior that could be construed as an attempt to influence the decision of the recipient. When in doubt, seek advice from the Chief Ethics and Compliance Officer.

CHARITABLE CONTRIBUTIONS

Charitable contributions, including those made through Bristow Uplift, play an important role in how Bristow supports the communities in which we operate. The Gifts, Hospitality and Charitable Contributions Policy includes rules and considerations applicable to contributions made on the Company's behalf, including:

- Contributions should be transparent.
- Contributions should fulfill a genuine need that has been established through local consultation.
- Charitable organizations should be bona fide and well managed.
- There should be a tangible local connection (e.g., a donation to a hospital used by a Company employee).
- There should be no reasonable chance of the contribution being misconstrued as a bribe.
- The contribution should not be given as a condition of or in order to influence a business decision.

Please refer to the Gifts, Hospitality and Charitable Contributions Policy for the rules and processes governing charitable contributions made by the Company. Contributions made through Bristow Uplift must adhere to the Bristow Uplift Mission Statement and Program Charter.

POLITICAL CONTRIBUTIONS

Bristow is politically neutral and does not make frequent or high-dollar political contributions. Employees may not make political contributions on behalf of the Company or use company resources for political purposes. For additional information, please refer to the Lobbying and Communications with Government Officials Policy and the Corporate and Personal Political Activities Policy.

FAIR COMPETITION

Our Core Values require commitment to competing fairly and earning and retaining business opportunities by delivering best-in-class services. Fair competition laws (also known as "antitrust" laws in the United States) prohibit practices or activities that unfairly restrict competition. The penalties for violating these laws are severe and can include prison time.

Employees must be mindful and avoid any formal or informal agreements or understandings with competitors to:

- Fix or coordinate prices or wages.
- Boycott certain customers or suppliers.
- Share information about prices, profits, or profit margins.
- Allocate markets, territories, or customers.
- Share any information that gives Bristow a business advantage.

Moreover, employees should limit interactions with competitors to the extent possible and always avoid discussion of the matters listed above. If a competitor engages you in a conversation concerning these topics, end the discussion immediately and contact the Legal Department.

You should likewise avoid any formal or informal agreements with other third parties, including suppliers or customers, that could unfairly limit competition in the marketplace. If you have questions about the legality of any proposed agreement, please consult the Legal Department.

QUESTION

Tamara recently attended a trade association meeting where several competitors discussed the need to agree on price cuts that would satisfy pricing while maintaining margins. Some competitors suggested a joint effort to ensure no competitor cut prices beyond a certain percentage. Tamara did not comment but left the meeting. Soon thereafter, multiple competitors cut prices by the agreed percentage. What should Tamara do?

ANSWER

Tamara acted appropriately by leaving the meeting. She should immediately report what occurred to the Legal Department. Bristow must always make independent decisions that are in its best interests. You should never participate in any discussions with competitors concerning the fixing of prices or other anti-competitive behavior. Instead, you should make it clear that such conversations are improper.

EXPORT CONTROLS AND OTHER INTERNATIONAL BUSINESS RESTRICTIONS

In an effort to serve national security and foreign policy goals, several countries impose controls and restrictions on international business and the transfer (both imports and exports) of certain goods. Applicable laws include the U.S. International Traffic in Arms Regulations (ITAR), the U.S. Export Administration Regulations (EAR), the U.K. Export Control Order 2008, EU Regulations, and the laws of the other countries in which we operate. Whether export control regulations require the Company to obtain authorization for a transaction can depend on the type of goods, services, software or technical information that is being transferred, the destination, and the ultimate end-user. If goods, services, software or technical information is sent from the United States to another country, the reexport of that item – or export from abroad of an item with U.S. – origin content – may require authorization from both the U.S. government and the local country's government.

In addition to the physical movement of goods, export controls can also apply to the release of technical information and software within the United States to a national of another country. Release of technical information that constitutes an export or re-export can occur, for example, in person, through a telephone conversation, or in an email communication.

QUESTION

Edward is a supply chain manager in the United Kingdom. He has been asked to process a shipment of aircraft parts to Nigeria. The aircraft parts were originally manufactured in the United States. Does he need to comply with United States export laws in shipping the parts from the United Kingdom to Nigeria?

ANSWER

Yes. Because the aircraft parts originated in the United States, Edward must strictly comply with United States export laws. Edward should consult with the Compliance Department to determine whether an export license is needed.

Failure to abide by export control laws can lead to civil or criminal penalties against Bristow and/or its employees, including the removal of export privileges.

Finally, countries may use other tools to prohibit or severely restrict business dealings, including customs requirements, embargoes, and economic sanctions. The governments of the U.S. and the U.K., for example, routinely impose sanctions on countries (e.g., Russia), organizations (terrorist groups, drug traffickers) and individuals (government officials, known terrorists).

If you are not sure whether a license or other form of government authorization is needed to import, export or re-export goods, services, software or technical information, consult the Compliance Department (ExportCompliance@bristowgroup.com) or the regional Export Compliance Manuals.

ANTI-BOYCOTT LAWS

U.S. anti-boycott laws prohibit U.S. companies from cooperating with boycotts imposed by other countries.

Boycotts are agreements to abstain from using, buying, or dealing with a particular country or entity as an expression of disfavor or a means of coercion.

Boycott-related requests are typically subtle and indirect and are often contained in invitations to tender, commercial contracts, and shipping documents.

A “boycott-related request” is a request to take any action that has the effect of furthering or supporting a foreign boycott in which the U.S. is not participating.

In general, Bristow employees may not:

- Refuse or agree to refuse to do business with or in a boycotted country;
- Refuse to employ or discriminate against any U.S. person based on race, religion, sex, or national origin;
- Furnish information (or knowingly agree to furnish information) about any person’s affiliations or business relationships with or in a boycotted country or with a national/ resident of a boycotted country; or
- Implement a letter of credit that contains a condition or requirement that furthers or supports unsanctioned boycotts.

OUR VALUES GUIDE US FROM THE START. IT’S THE BRISTOW WAY

INTEGRITY IN MANAGING COMPANY ASSETS

THIS SECTION CONTAINS GUIDANCE ON THE FOLLOWING:

Conflicts of Interest, Confidentiality and Data Privacy, Communications and Social Media, Protection and Use of Company Assets

CONFLICTS OF INTEREST

As described in Bristow's Conflict of Interest Policy, a conflict of interest arises whenever your personal interests (or those of close relatives or people with whom you are in close personal or business contact) interfere with the Company's interests. Often, even the appearance of a conflict of interest can be just as damaging to your reputation or the Company's reputation as an *actual* conflict of interest.

Any actual or apparent conflict of interest, or any relationship with a third party that might influence, or appear to influence, the exercise of your judgment must be disclosed to your supervisor and vetted by the Compliance Department so that the conflict can be addressed.

QUESTION

Alan's brother-in-law owns a company that supplies high quality aircraft parts. Alan believes that Bristow would benefit from doing business with his brother-in-law. What should he do?

ANSWER

Alan should disclose the situation to his supervisor and the Compliance Department and should refrain from participating at any level in the decision of whether or not to hire his brother-in-law's company.

Here are some common examples of conflicts of interest:

- Conducting business on Bristow's behalf with an organization in which a family member or close friend works or has an ownership interest
- Having a direct reporting relationship over someone with whom you share a close personal relationship. For more information, refer to your region's Employee Handbook
- Having an affiliation or ownership interest in a company with which Bristow conducts business or competes against.
- Taking personally (or for another person) any opportunity that may be of interest to the Company
- Accepting any personal advantage given to you in your capacity as an employee of the Company except for allowable gifts and hospitality. Refer to the appropriate section in COBI

Review the Conflicts of Interest Policy or consult your supervisor or the Compliance Department if you have any questions.

WHAT SHOULD I DO?

- Always act in the best interests of the Company and never allow personal interests to interfere with your ability to make sound, objective business decisions
- Immediately disclose any potential conflict of interest to your supervisor, who can work with the Compliance Department to determine whether there is a conflict
- Remove yourself from any decision concerning the management of the potential conflict of interest
- Obtain guidance and/or preapproval from the Compliance Department of any actual or apparent conflicts of interest before proceeding

CONFIDENTIALITY AND DATA PRIVACY

Strict laws, like the General Data Protection Regulation (GDPR), and Company policy require that we protect and safeguard confidential information and personal data, whether the information or data belongs to Bristow or to others.

Any such information and data may be shared only on a need-to-know basis within the Company. Employees are prohibited from making any unauthorized disclosure or transfer of confidential information or personal data without appropriate approval from management or the data subject themselves. When in doubt, err on the side of consulting the Compliance Department (dataprivacy@bristowgroup.com) and Bristow's Global Data Privacy Policy.

QUESTION

Hendrik is working on a customer proposal that contains confidential information related to the customer's business. He needs to forward the proposal by email to another Bristow employee, Heidi, so that they can collaborate. Should Hendrik trust Heidi to maintain the document's confidentiality?

ANSWER

As the owner of the document, Hendrik is responsible for classifying it as "Confidential" and taking steps to reduce the chances of its intentional or accidental disclosure to unauthorized persons. Such steps could include the placement of a "do not forward" statement in the email to Heidi.

Confidential information is any information that provides Bristow with an advantage over competitors that do not have this information. Examples include:

- *pricing*
- *financial results*
- *sales plans*
- *strategy documents*
- *other internal correspondence*

Confidential information also includes the personal information of our employees, customers and business partners (referred to as Personal Data).

Accidental disclosure of confidential information can be as harmful as intentional disclosure. We need to be particularly careful of what we say in our day-to-day interactions with customers and other third parties in social settings. Be careful with handling electronic information to prevent inadvertent disclosure. Protect Company computers and other data devices from theft and damage.

We must also protect the confidential information entrusted to us by third parties, such as customers and suppliers. Disclosure of such information to unauthorized individuals is strictly prohibited without the written authorization of the entrusting party. Please remember that the penalties for violating applicable laws, including the GDPR and similar data-privacy laws, are severe.

Similarly, particular care must be exercised by those who handle personal data. We store sensitive personal information about our employees, such as bank account information, medical information, and trade union membership. Personal data may be collected, used, transferred and disclosed in strict compliance with applicable law. Bristow respects the right to privacy, and the Company works diligently to protect personal data from intentional or inadvertent disclosure or misuse.

In the event you receive confidential information or personal data originating from a competitor or other third party that did not intend to release it, you should immediately contact your supervisor or the Legal Department without acting on the information received. The unauthorized use of such information could subject Bristow to allegations of misappropriation.

Finally, special care is required when publicly releasing information concerning the Company's business, strategies, activities, and plans. The disclosure of this information could influence investors trading in the Company's securities. All media contact and public statements concerning Company business should be coordinated with Bristow's Chief Financial Officer.

COMMUNICATIONS AND SOCIAL MEDIA

Remember that your oral and written communications are a reflection of Bristow. Information conveyed in any communication should be accurate, truthful, and never misleading. You should not make false or disparaging statements about Bristow, its employees, other persons, or businesses. If you become aware of any such false or misleading statements, please promptly report them to the Legal Department.

All social media used for business-related purposes is managed by Global Communications. When it comes to your personal use of social media, exercise good judgment when posting comments related to Bristow, particularly about our commercial business, and avoid disclosing any material, non-public information. Improper posts on social media can have significant public implications for the Company. You should always make clear that you are not communicating on behalf of the Company; rather, you are expressing your own opinions.

Please also remember that, to the extent allowed by law, the Company reserves the right to monitor its information systems, which may include employees' activities and communications. You should have no expectation of privacy when using Company-provided technology such as email or mobile phones.

For additional information, please refer to Bristow's Social Media Policy and the Employee handbook.

PROTECTION AND USE OF COMPANY ASSETS

We must protect the Company's assets and ensure that they are used only for legitimate business purposes. Bristow's assets include equipment, buildings, tools, funds, accounts, supplies, computer programs, information technology, documents, know-how, data, patents, trademarks, copyrights, and any other resources or property of the Company, such as employee time during work hours.

As a Bristow employee, any work you create, in whole or in part, in connection with your work duties, and/or using company time, resources, or information, belongs to Bristow.

Theft, wasteful use of resources, and fraudulent activities are detrimental to the Company's interests and are therefore prohibited.

We must also be vigilant when it comes to access to our assets by others. Any such access to the Company's intellectual or physical assets must be limited to authorized persons for a legitimate business purpose.

WHAT SHOULD I DO?

- Ensure that Company assets are used only for legitimate business purposes.
- Obtain proper authorization before selling, loaning, or giving away Company assets.
- Do not allow personal phone calls or emails to interfere with your workday.
- Report suspected theft, waste, or fraud to your supervisor or through the Ethics and Compliance Hotline.

Updated November 2023

ACKNOWLEDGMENT

I CONFIRM THAT I HAVE READ AND UNDERSTOOD THE BRISTOW CODE OF BUSINESS INTEGRITY

Signed

Name (Please Print)

Location

Date

Please sign and return this acknowledgment to Compliance@bristowgroup.com.

airnorth
together we fly

Bristow

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