



Code of Conduct Policy

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A Message from ARC's President and CEO

Dear ARC Colleague,

We are grateful to have you as a valued employee of ARC. You are a member of an organization that is passionate about *how* we work. Integrity and credibility are immeasurable corporate assets, particularly for a company with functions that embrace financial settlement and data analytics. When these assets are lost, they are almost impossible to regain. For that reason, we strive to make sound and ethical choices that serve our customers, improve the travel ecosystem, and inspire our team.

Thanks to the effort and dedication you put forth daily, ARC has built a reputation as an exceptional place to work and a company that can be trusted. We rely on you, our employees, to maintain and enhance that reputation; you are the “face” of ARC.

The following Code of Conduct is the cornerstone of ARC's culture. It explains the principles that define our company. I encourage you to read the Code thoroughly and reflect on its meaning. We developed this Code as a guide for you in addressing common challenges and situations you may face at ARC. That said, it is impossible to anticipate everything. Throughout the Code we have identified individuals from whom you can receive guidance and ask questions. We have also provided mechanisms to raise concerns anonymously if you desire. In either case, your information will be treated confidentially, without a possibility for retribution or reprisals.

We have established a policy of conducting our affairs in compliance with the letter and spirit of the law and adhering to the principles of business ethics. When you sign it, you renew your personal commitment to practice and promote it every day. The entire Executive Team and I are fully committed to working with you to maintain ARC's highly regarded reputation for future generations.

Thank you for your cooperation and commitment.

Sincerely,

A handwritten signature in black ink that reads 'Lauri Reishus'.

Lauri Reishus
ARC President and CEO



1. Introduction

ARC is committed to maintaining the highest standards of ethical business conduct and following all applicable laws and regulations. **We strive to always do the right thing.** Most of the time knowing what the right thing to do is easy, but sometimes it is not. We have created this Code of Conduct and the policies and procedures we reference to help you when you have questions. This Code will not give you every answer to every question, but it will provide you with some general guidance and let you know where to go if you have questions that you cannot answer yourself.

Following the Code of Conduct is part of the commitment we make to ARC and to our fellow employees. If you do not comply with this Code of Conduct, you could put yourself, other employees, and ARC itself at risk.

2. ARC's Mission, Vision, and Culture

At ARC, our work is guided by our mission, our vision and our culture.

ARC's mission is to advance and unify the global air travel community by delivering trusted solutions, proven expertise and flexible technology. ARC's vision is to be the partner and platform every enterprise in air travel counts on to succeed.

ARC's culture can be best understood through our culture statements, which are:

- I. **We collaborate.** We see the big picture. We know the purpose of each project we touch; our priorities as a company; and what our customers want.
- II. **We think big.** We remove barriers and share information freely. We partner across teams, across locations and with our customers. We move past blame and finger pointing to think and act as a team.
- III. **We explore new ideas.** We try new things without fear. We are endlessly curious and willing to learn when things don't go as expected.
- IV. **We embrace challenges.** We solve problems when we see them and bring creative thinking to contentious issues.
- V. **We help our customers thrive.** We are experts in air travel and provide solutions that help our customers succeed.
- VI. **We are passionate and empowered.** We believe in autonomy and make decisions at the right level. We own the end result and are proud of our work.



3. Your Responsibilities

All ARC employees must always use the highest standards of behavior while working for ARC. This means that you must comply with all ARC policies and procedures as well as any applicable laws and regulations. If you have any questions or concerns about what to do in a business situation, ask!

Before doing any business activity, ask yourself these questions:

- I. Is it illegal?
- II. Is it unethical?
- III. Does it violate any ARC policy or procedure?
- IV. Would you or ARC be embarrassed if it became known?

If the answer to any of the questions above is “Yes”, then do not do it! If you are not sure of the answer to any of the questions above, please seek guidance.

If you are a people manager, you have additional responsibilities. You must lead by example. It is your responsibility to create an environment where the people who report to you understand their responsibilities and feel comfortable raising questions and concerns to you.

4. Where Do I Find ARC’s Policies & Procedures?

All of ARC’s policies and procedures can be found on ARC Central.

5. Speak Up!

If you see or hear things that just don’t seem right, if you see or learn of any illegal or unethical conduct, or if you suspect a policy violation, speak up!

We need to know about your concerns so we can address those concerns quickly and properly. When you speak up, you help protect yourself, your co-workers and ARC.

If you speak up in good faith and raise a concern or report a suspected policy violation, you are doing the right thing. **ARC will not tolerate retaliation of any sort for you doing the right thing. Period.**

There are many ways to speak up. You can report your concerns to:

- I. Your manager.
- II. Your manager’s manager.



- III. The head of your department.
- IV. A member of ARC's Executive team.
- V. ARC's Chief Compliance Officer.
- VI. ARC's Human Resources Department
- VII. ARC's Audit Committee chairman (angie.owens@aa.com)
- VIII. Anonymously through an independent helpline, NAVEX Global's EthicsPoint, either by phone at 1-866-294-5698 or at www.ethicspoint.com. The helpline is available 24 hours a day, seven days a week.

ARC will handle your report with discretion. However, keep in mind that we have to look into the matter and ARC may have a legal obligation to make information about the matter available to third parties.

What happens if you speak up? Each case is unique and we will look into each matter.

- I. In some instances, we might not need to take action.
- II. In other instances, if the facts warrant, we will take corrective action to improve our practices or take corrective action against employees who have broken the law or violated company policy.
- III. In some cases, we may report matters to law enforcement for possible prosecution and we may need to self-report to the government.

If ARC hears about a potential violation of this Code of Conduct or of any policy or procedure, ARC will investigate. Determining the truth of any allegation of a policy violation is very important to us. To properly investigate, we may need your help. If you are asked to help with an investigation, you must cooperate with your truthful participation. ARC will keep all investigations as confidential as we can, and if you are a people leader, you are required to keep all aspects of any investigation that you are part of confidential as well.

To the extent appropriate, we will also report back to you on what we found.

6. Equal Employment Opportunity

As an equal opportunity employer, ARC makes employment decisions without regard to race, religious creed, color, age, sex, national origin, ancestry, citizenship status, religion, marital status, sexual orientation, gender identity, disability, military service or veteran status, genetic information, or any other classification protected by applicable federal, state, and local laws and ordinances. We apply this policy not only with respect to hiring, but also placement, performance management, promotion, transfer, demotion, layoff, termination, recruitment, advertising, pay, and other forms of compensation, training, and general treatment during employment.

7. Respectful Workplace

ARC is committed to having a professional workplace that is supportive and allows every employee to achieve their fullest potential. ARC strives to maintain a respectful workplace based on tolerance and inclusion. This means that any illegal discrimination or harassment of any employee by another employee, contractor, or other third party will not be tolerated. This also means that we are committed to a safe work environment without violence. For details about our commitment, please see ARC's Employee Handbook.

8. Conflicts of Interest

When you are working for ARC, we expect you to do your best for ARC. This means you need to avoid anything that is, or may even appear to be, a conflict of interest. Please reference ARC's Employee Handbook to help you determine if you have an actual or potential conflict of interest.

9. Information Security at ARC

ARC has a lot of information that may be considered to be sensitive and confidential. We strictly follow policies and procedures to help ensure that such information always stays safe, and you play a big role. Make sure that you review ARC's Information Security policies and procedures so you can help keep sensitive information secure.

10. Legal Considerations

If you have any questions about any legal issue, including dealing with competitors, the proper treatment of customers' financial information, or working with the federal government, you can review the Employee Handbook, the Government Contracts Code of Business Ethics and Conduct, the Legal Department's internal website, or talk to ARC's in-house attorneys – they will be happy to help.

11. Conclusion

All ARC employees should read, understand, and follow this Code of Conduct and the policies and procedures it references. ARC maintains the right to change these terms, but we will notify you of any substantive change. Remember — if you have any questions or concerns, please ask.

12. Exceptions

The Chief Information Officer, in conjunction with the VP, Enterprise Risk & CISO, will review all written exception requests on a case-by-case basis and will only approve those requests where a sufficiently compelling business reason exists. Prior to this occurring, these written exception requests must first be pre-approved by the appropriate departmental VP to ensure Executive Team knowledge, concurrence and acceptance of the risks involved in the requested action.

13. Summary of Responsibilities

Below is a RACI chart which constitutes the core roles and responsibilities associated with this policy.

Responsible (R), Accountable (A), Consulted (C), Informed (I) (RACI) Chart					
Code of Conduct					
Code of Conduct Functions	CFO	Managing Director, People & Culture	Senior Legal Counsel	VP, Enterprise Risk & CISO	User Community
Sponsor	R	A	C	I	
Initiator	A	R	C	I	
Develop & Submit	C	A	R	I	
Review	R	R	C	I	
Implementer	A	R	A	I	I
Evaluator	R	R	R	C	I
Maintainer	I	C	C	R	I



14.Supporting Documents and References

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Document	Source	Applicability
ISO 27001	ISO 27001 Catalogue	Management Framework
PCI 3.2.1	PCI Document Library	Compliance Framework