

**Crown Aviation Holdings Inc.**  
**(the “Company”)**

**Safe Workplace Policy**  
**(adopted as of May 30, 2024)**

This Safe Workplace Policy (the “**Policy**”) has been adopted by the Board of Directors of the Company and applies to all directors, officers, employees, consultants, and all and every other form of worker of the Company without limitation (the “**Crown Aviation Team Members**”). This Policy applies always and in all places without limitation to all interpersonal communications by and between Crown Aviation Team Members regardless of whether expressed in person or electronically (such as via email, text, social media, and all other forms of digital correspondence).

**Workplace Bullying and Harassment - Defined:**

- a) All and any inappropriate conduct or comments by Crown Aviation Team Members towards any other person, regardless of if the other person is a Crown Aviation Team Member, that causes the other person, acting reasonably, to feel humiliated or intimidated;
- b) Unwelcome sexual advances or solicitations; requests for sexual favors; and other verbal and non-verbal, or physical conduct of a sexual, or otherwise offensive nature;
- c) Offensive comments, jokes, innuendoes, sexually suggestive gestures, sexually degrading words, phrases, images, videos, memes, and all other forms of media used to describe an individual, and other sexually oriented statements;
- d) Visual conduct such as derogatory and/or sexually oriented posters, photography, cartoons, drawings, or gestures that causes another person, acting reasonably, to feel humiliated or intimidated;
- e) Verbal aggression or insults, calling someone derogatory names, spreading malicious rumors, vandalizing personal belongings, or harmful hazing/initiation practices and all other acts or actions of a similar nature.

**Acceptable Conduct:**

Workplace bullying and harassment is not acceptable and will never be tolerated at the Company. Crown Aviation Team Members will be treated in a fair and respectful manner regardless of their race, religion, sexual orientation, belief systems, cultural norms or for any other reason. Crown Aviation Team Members are responsible for respecting the rights of their fellow Crown Aviation Team Members and for taking reasonable and appropriate measures to prevent discrimination and harassment from occurring in the workplace.

Every member of the Crown Aviation Holdings Inc. Management Team (the “**Crown Aviation Management Team**”) is responsible for creating a constructive and inclusive atmosphere that is free of discrimination and harassment, sexual or otherwise, and is always responsible for informing all Crown Aviation Team Members that discrimination and harassment is not and never will be tolerated at the Company and that

all or any such conduct is subject to disciplinary action which may include termination of employment or cancellation of contracts for cause and with immediate effect.

The Company considers sexual harassment to be of a particularly serious and heinous nature. Sexual harassment is strictly prohibited at the Company and investigations of all reports of sexual harassment may be referred to subject matter experts including the police who may pursue criminal charges against all or any offending party with the full and unfettered support of the Company and the Crown Aviation Management Team without limitation.

**Responsibilities of Crown Aviation Team Members:**

1. Comply with the Company policies and procedures on Workplace Bullying and Harassment.
2. Not engage in the bullying and/or harassment of any person for any reason at any time in any place.
3. Promptly report all incidents of Workplace Bullying and Harassment to the Crown Aviation Management Team in the strictest of confidentiality.

**Responsibilities of Crown Aviation Management Team:**

1. Attentively listen to every report of Workplace Bullying and Harassment.
2. Collect all information that a responsible person, acting reasonably, would deem necessary to conduct a proper investigation of Workplace Bullying and Harassment.
3. Resolve the report in accordance with the local Workers Compensation Board (i.e. subject matter experts, such as: Workers' Compensation Board and/or the local police service) and the Company's policies and procedures.

**Reporting Instances of Workplace Bullying and Harassment Procedure:**

1. Report incidents of Workplace Bullying and Harassment by describing all the details of the alleged incident in detail (to the best of your abilities) and submit your written account in the strictest of confidentiality to the Crown Aviation Management Team.
2. Report Incidents as soon as possible after experiencing or witnessing an incident of Workplace Bullying and Harassment. Timely reporting of Workplace Bullying and Harassment helps the investigating authority make good, proactive, and informed decisions to ensure incidents are efficiently investigated and effectively resolved.
3. Provide as much information as possible in your report. Include (to the best of your abilities) the names of all people involved, any witnesses, where the events occurred, when the events occurred, and what behaviors, words, attitudes, actions, and/or events led to your filing a report of Workplace Bullying and Harassment.
4. Attach supporting documents such as emails, handwritten notes, text messages, photographs, physical evidence, damaged personal belongings, and all or any other materials that could help substantiate your report and bring about a resolution.

**Company Action Plan:**

Respecting the highest levels of confidentiality and care, the Crown Aviation Management Team will investigate all reports of Workplace Bullying and Harassment and respond to all complainants as quickly and effectively as possible. The investigation of Workplace Bullying and Harassment may include private and confidential meetings with other persons including, but not limited to, Crown Aviation Team Members

and/or the Crown Aviation Management Team. If a reasonable determination of an occurrence of Workplace Bullying and Harassment is made, corrective action will be taken which may include criminal charges being levied against the offending party, or parties, if deemed appropriate by the police.

Your report will, to the fullest extent possible, be kept in the strictest of confidentiality such that only those on a “need to know basis” will be made knowledgeable of the existence of your report and the resulting investigations derived from your report. Notwithstanding the foregoing, and without limiting best efforts to maintain confidentiality, the investigation of reports of Workplace Bullying and Harassment may require disclosure to certain Crown Aviation Team Members and/or the Crown Aviation Management Team and other persons to gather pertinent information and conduct a comprehensive investigation of the facts.

The Company expressly prohibits all forms of retaliation against any Crown Aviation Team Members and/or Crown Aviation Management Team for the filing of a report of Workplace Bullying and Harassment, or for assisting in the investigation of any such report, without limitation. However, if after investigating a report of Workplace Bullying and Harassment the Company and the investigating authorities, acting reasonably, determine the report is not bona fide, or that a party has knowingly provided false information in any such report, disciplinary action (which may include termination for cause) may be taken against such party who provided or assisted in the provision of such false information.

If the Company and the investigating authorities, acting reasonably, determine that a party or parties is guilty of Workplace Bullying and Harassment, disciplinary action will be taken against the offending party or parties which may include termination for cause and criminal charges being filed against the offending party, or parties, if deemed appropriate by the police.

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**Acknowledgment and Agreement:**

Having read, understood, and agreed to all the terms and conditions of this Workplace Bullying and Harassment Policy; I, the undersigned, agree to be bound by the terms and conditions contained herein without limitation of any kind.

Signed: \_\_\_\_\_

Name:

Title:

Date:

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Crown Aviation Holdings Inc. | A growth by acquisition company