

Policy No TAMS 126

Original Issue Date:	APR 22, 2024
Revision Date:	APR 22, 2024
Issued By:	TOPACES INC.
Policy Owners:	VP Legal Affairs, General Counsel and Chief Compliance Officer Chief Human Resources Officer

TOP

DOC # TAMS 126


Approved by: VP Legal Affairs & CHRO

Revision date: 2024 APR 22

Revision # 0

TAMS 131.15 - Policy Template Rev 1



	DOC # TAMS 126	Approved by: VP Legal Affairs & CHRO
	Revision date: 2024 APR 22	Revision # 0
TAMS 131.15 - Policy Template Rev 1		


1 INTRODUCTION & SCOPE

This policy outlines TopAces' (or "the Company") approach and business practices concerning environmental, social and governance (ESG) matters. We recognize the importance of our environmental and social responsibilities, as evidenced by our stakeholders' interests, including investors, customers, regulators, employees, and communities. Despite the unique challenges inherent to our sector, we are committed to establishing a robust foundation that ensures our relevance, resilience, and fosters sustainability and stakeholder trust throughout our ESG journey.


This document encompasses specific ESG considerations deemed pivotal for the Company, applicable across all TopAces business units and subsidiaries.

2 ROLES AND RESPONSIBILITIES

2.1 What We it

		
	DOC # TAMS 126	Approved by: VP Legal Affairs & CHRO
	Revision date: 2024 APR 22	Revision # 0
TAMS 131.15 - Policy Template Rev 1		


3

	DOC # TAMS 126	Approved by: VP Legal Affairs & CHRO
	Revision date: 2024 APR 22	Revision # 0
TAMS 131.15- Policy Template Rev 1		

In 2023 Top Aces introduced a Hybrid Working Model Policy, offering employees the ability to work both remotely and in the office based on their roles, providing flexibility and autonomy. This initiative reduces commuting frequency, resulting in decreased carbon emissions from vehicles. Additionally, it lowers energy consumption in office buildings, contributing to reduced overall environmental impact.

43 Waste Management Practices

Given the nature of our operations, effective waste management is a critical priority for our company. We are committed to implementing responsible waste management practices that mitigate health risks, reduce liability, and safeguard the environment, while upholding compliance with relevant laws and regulations. Our waste management strategy and protocols are outlined in our Environment, Health & Safety (EHS) Policy Manual. All Top Aces personnel are required to understand, embrace, and contribute to the implementation of our EHS Policy and its guiding principles. Specifically regarding hazardous waste, stringent measures are in place to ensure proper collection, treatment, storage, and disposal. Notably, we collaborate with reputable third-party entities that handle hazardous waste disposal with utmost safety and responsibility, alongside certem hvenchismelsted fit

	DOC # TAMS 126	Approved by: VP Legal Affairs & CHRO
	Revision date: 2024 APR 22	Revision # 0
TAMS 131.15 - Policy Template Rev 1		

Upon onboarding, employees are expected to participate in comprehensive briefings on flight safety, the SMS, and employee health and safety protocols. Additionally, an annual safety briefing/training session is conducted for all personnel directly involved in operations, including pilots, technicians, and operations staff.

A Global Safety Committee, comprising safety representatives from all business units, convenes quarterly to address safety matters comprehensively. Furthermore, safety is integrated systematically into various organizational forums, including the weekly operations briefings, monthly business unit reviews, and quarterly updates to senior leadership and the Board.

A safety dashboard monitoring key performance indicators is maintained and a six-monthly report is provided to the Board.

DOC # TAMS 126

Approved by: VPI Legal Affairs & CHRO

	DOC # TAMS 126	Approved by: VPI Legal Affairs & CHRO
	Revision date: 2024 APR 22	Revision # 0
TAMS 131.1.5 - Policy Template Rev 1		

TOP

DOC # TAMS 126

Approved by: VP Legal Affairs & CHRO

Revision date: 2024 APR 22

Revision # 0

TAMS 131.15 - Policy Template Rev 1

