

# ACE Aviation Ethics Reporting Program

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*May 1, 2010*

Laws and rules establish minimum standards of conduct in today's society while ethics carry yet a higher standard.

All employees must lead by example. It is about building trust with our colleagues, customers, suppliers, shareholders and government.

It is the responsibility of employees at all levels in the performance of his or her duties to comply with the Corporate Policy and Guidelines on Business Conduct ("Code of Conduct") and related workplace policies. You have an additional responsibility to report any violation.

## **Compliance with Law**

The establishment of ACE Aviation's Ethics Reporting Program, which allows employees to report any form of financial misconduct, was driven by new Ontario Securities Commission regulations in Canada and the Sarbanes-Oxley Act in the United States. The rules in both countries state, in part, "...the audit committee must establish procedures for...the confidential, anonymous submission by employees of the issuer of concerns regarding questionable accounting or auditing matters."

## **Financial and Accounting Records**

Financial and accounting records including contracts and other reports will be maintained in accordance with generally accepted accounting principles and ACE Aviation's internal controls system and accounting policies.

## **Theft, Fraud and Embezzlement**

Theft, fraud and embezzlement represent violations of the Code of Conduct and the laws of our society. In their most general forms, fraud and embezzlement are acts to appropriate or steal through willful deception, deceit or trickery.

## **Conflict of Interest**

It is our policy to conduct business on the basis of legitimate business considerations. Employees are expected to perform their duties conscientiously, honestly and in the best interests of ACE Aviation including its subsidiaries. Employees must not use their position or knowledge gained as a result of their position for private or personal gain.

Situations involving conflicts of interest may not always be clear. Where clarification is required, please contact the Corporate Secretary of ACE Aviation at (514) 422-5812 or by e-mail at [carolyn.hadrovic@aircanada.ca](mailto:carolyn.hadrovic@aircanada.ca).

## Compliance Procedures

Where concern exists relative to any of the following three categories:

1. Financial reporting and accounting irregularities;
2. Fraudulent or dishonest activities; or
3. Conflict of interest

Then employees should consider:

- Discussing the concern with his/her manager; or
- Filing a confidential, anonymous report via the ACE Aviation Ethics Reporting Hotline. This can be done on-line by contacting the independent reporting service provider, ClearView Strategic Partners, at [www.clearviewconnects.com](http://www.clearviewconnects.com). You can also report your concern by telephone to its hotline at 1-877-333-2095 in Canada and the United States (24 hours / 7 days a week).

Disciplinary action or reprisal will not be taken against any employee who, in good faith, makes a report concerning a breach of the Code of Conduct.