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1 INIRODUCIION & SCOPE

This policy offines Top Aces' (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 interent to our sector, we are committed to establishing and ustfoundation 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 RESPONSE LILES

21 WhatWe iT

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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 in pact

43 Waste Management Placices

Given the nature of our operations, effective vaste management is a critical pionity for our company. We are committed to implementing responsible waste management practices that mitigate health isls, reduce liability, and safegured 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 Manuel. All Top Aces personnel are required to understand, enclose, and contribute to the implementation of our EHS Policy and its guiding principles. Specifically regarding hazardous waste, stringent measures are in place to ensure propercollection, treatment, storage, and disposal. Notably, we collaborate with reputable third party entities that handle hazardous waste disposal with utnost safety and responsibility, alongside centern hverdosneelisted fot

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Upon orboarding employees are expected to participate in comprehensive briefings on fight 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 veekly operations briefings, monthly business unit reviews, and quarterly updates to serior leadership and the Board

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