

CODE OF CONDUCT FOR ETHICAL BUSINESS OF AIR TRANSPORT SERVICES GROUP, INC.

A. General Policy Statement

At Air Transport Services Group, Inc. and its subsidiaries (the “Company”)¹, we value our People, Safety, Teamwork, Quality, Customer Satisfaction, and Trust. These values provide a framework for all employees and all members of the Board of Directors of the Company (the “Board”) as well as contractors, suppliers, and other business partners as deemed necessary by the Company (collectively the “Conducting Parties”) as we conduct business and carry out our day-to-day responsibilities. This Code of Conduct for Ethical Business (the “Code of Conduct”) is not intended to serve as a substitute for our values, but rather to serve as important guidelines in helping us conduct business in accordance with our values. Compliance requires meeting the spirit, as well as the literal meaning of the laws and regulations that govern sound business practices, as well as the individual policies of the Company.

The reputation of any company is solely dependent on the ethical conduct of its leadership and workforce. Every person associated with the business of the Company is responsible for ensuring that the reputation and integrity of the Company is protected at all times. This Code of Conduct is intended to be a set of guidelines highlighting key issues that may arise while conducting business. It is not intended to be a comprehensive list of every situation one may encounter. *Whenever you are in doubt regarding a provision of this Code of Conduct, you should contact your immediate supervisor, a member of senior management, your Human Resources Department, your Compliance Officer, or the Chief Legal Officer. References to the Chief Legal Officer throughout this Code include their designee or other attorneys within the Legal Department, who will coordinate with the Chief Legal Officer.*

B. Conducting Party Responsibilities

Read, understand and comply with this Code of Conduct and other company policies. If you have any questions regarding this Code of Conduct or other policies, discuss them with your immediate supervisor, a member of senior management, your Human Resources Department, your Compliance Officer, or the Chief Legal Officer.

Conducting Parties have a duty to report any suspected violations of this Code of Conduct or any Company policy or any law or regulation applicable to the Company. Report any suspected violation to your immediate supervisor, a member of senior management, your Human Resources Department, the Chief Legal Officer (via telephone at (937) 366-2686 or email at josh.carter@atsginc.com) or the Company CEO (via email at greg.mays@atsginc.com). Such matters may also be reported by calling the Company’s Compliance and Ethics Hotline (FaceUp) at (833) 501-0940 or using the FaceUp website: <https://faceup.com/c/atsginc>. Reports made using the FaceUp hotline or website can be anonymous. Both the phone number and website are monitored 24 hours a day, 7 days a week.

Understand that the Company prohibits any form of retribution or retaliation towards any person for reporting in good faith a suspected violation of law, regulation or Company policy, or for cooperating with or participating in investigations or proceedings related to workplace issues. Conducting Parties who become aware of suspected retribution or retaliation should report it to their immediate supervisor, a member of senior management, Human Resources

¹ For purposes of this Code of Conduct, references to the Company shall include the Company’s subsidiaries, except where the context otherwise requires.

Department, Compliance Officer, the Chief Legal Officer, or through the FaceUp hotline or website. All complaints of retribution or retaliation will be promptly and confidentially investigated, and employees who are found to have engaged in retaliation will be subject to disciplinary action, up to and including termination (See also your company's Workplace Harassment Policy).

If a report of a potential violation of a law, regulation, or Company policy is made against you, your business unit, or your colleague(s), you are expected to fully and honestly cooperate with the Company's investigation, maintain confidentiality, and take no retaliatory action against the person(s) who reported or who you believe reported the matter. Unjustified refusal to cooperate with an investigation, or intentional obstruction of the investigation, may result in corrective action, up to and including termination of employment. Also, employees must not provide false, misleading, or incomplete information, destroy or alter relevant documents or records, or attempt to influence the statement of others. Doing so may result in disciplinary action, up to and including termination. Cooperation includes, but is not limited to:

- Attending investigation meetings or interviews;
- Providing complete and truthful information, including documents, emails, messages, or other records within the employee's control that relate to the investigation;
- Answering questions to the best of the employee's knowledge and correcting any mistaken or incomplete information if later discovered in a prompt manner; and
- Maintaining confidentiality and not discussing or disclosing the investigation, interview questions, or investigation records or materials with coworkers or others, except as explicitly authorized by the investigator or Chief Legal Officer or as otherwise authorized by law.

Understand that if you are aware of, or reasonably should have been aware of, a violation of law, regulation, or Company policy and fail to make an appropriate report, you may be subject to discipline, up to and including termination. If you are unsure of your responsibility to report, contact your immediate supervisor, a member of senior management, your Human Resources Department, your Compliance Officer or the Chief Legal Officer.

C. Core Requirements

All employees and Board members acting on behalf of the Company must fully comply with this Code of Conduct.

All Conducting Parties will strictly observe all laws and regulations in the performance of their duties on the Company's behalf and will conduct the Company's affairs in keeping with the highest moral and ethical standards, including as set forth in the Company's Anti-Bribery & Anti-Corruption ("ABAC") Compliance Policy which includes the Foreign Corrupt Practices Act ("FCPA"). Conducting Parties are also expected to reasonably observe applicable laws and regulations outside of the workplace and conduct themselves ethically and responsibly.

The Company is an equal opportunity employer. It is and shall continue to be the Company's policy that all persons are entitled to equal employment opportunity regardless of race, color, religion, gender or sex, sexual orientation, gender identity, national origin, age, marital status, disability, veteran status, ancestry or any other status or condition protected by applicable state or federal laws, including but not limited to pregnancy, childbirth, or related medical conditions.

The Company is committed to providing a work environment free of any form of harassment or discrimination. Harassment of or discrimination against any employee on the basis of any status or characteristic protected by law is strictly prohibited (see also, your company's sexual harassment policy).

The Company expects and is entitled to the complete and undivided loyalty of all employees and Board members. A conflict of interest occurs when an individual's private interest interferes in any way with the interests of the Company. This situation may arise when a director, officer, or other employee takes actions or has interests that may make it difficult to perform their work objectively and effectively. Conflicts of interest also arise when a director, officer, or other employee, or a member of such person's family or household, receives improper personal benefits as a result of the director's, officer's, or other employee's position with the Company. Examples of such improper benefits include but are not limited to accepting gifts, favors, or entertainment of greater than a de minimis value, preferential treatment for family or friends, improper discounts or services, kickbacks or side deals, holding a financial or other interest in a competitor or vendor, and using Company resources for personal gain. A conflict of interest is deemed to exist whenever, as a result of the nature or responsibilities of their relationship with the Company, a director, officer or other employee is in a position to further any personal financial interest or the financial interest of any member of such person's family. No employee or Board member shall have any relationships, dealings or investments that may create any personal interest that actually or potentially conflicts with the interests of the Company. Employees and Board members are required to avoid any situation or interest that could influence or appear to influence their objective decision making in the performance of their responsibilities to the Company (see also, your company's conflict of interest policy). Board members and executive officers must promptly disclose to the Chief Legal Officer the nature of any conflict of interest or any material transaction or relationship that could be expected to give rise to a conflict of interest or the appearance of a conflict of interest. (see also, your company's Conflict of Interest Policy).

Company employees and Board members and certain other Conducting Parties are entrusted with considerable intellectual property and are expected to protect it at all times. The Company's employees, Board members, and such Parties are expected to safeguard patents, trade secrets, trademarks, copyrights, software, technical data and other proprietary information. Likewise, the Company respects and will protect the intellectual property rights of others. Unauthorized use of the intellectual property rights of others may expose the Company to civil lawsuits and damages and is strictly prohibited (See also, your company's Social Media Use Policy).

Company employees, Board members and certain other Conducting Parties are entrusted with information that the Company considers confidential and proprietary, including information about our customers and others with whom we do business. Safeguarding this information is of the utmost importance and is critical for sustaining long-term relationships important to the Company's success. Unless required by your job or by law, no Company employee, Board member, or Conducting Party should discuss or share confidential information with anyone inside or outside the Company. Company employees who regularly handle confidential information may be required to sign a confidentiality agreement as a condition of employment. Confidentiality agreements may also be required on a case-by-case basis due to the nature of a specific project or assignment (see also, your company's confidentiality policy and the Company's Insider Trading Policy).

D. Management Responsibilities

All members of management are responsible for maintaining a workplace that fosters the values and principles described in this Code of Conduct

All Conducting Parties are expected to promptly report any information concerning deficiencies in the design or operation of disclosures and internal controls or any actual or alleged fraud, whether material or not.

Upon receipt or awareness of a complaint of a suspected violation of law, regulation or Company policy by an employee or other person doing business with the Company, report such complaint in accordance with the reporting obligations set forth herein. Regardless of how small, report all suspected violations to senior management in a timely fashion. In addition to any other reports made under this Code of Conduct, immediately inform a member of the Legal Department upon becoming aware of potential violations of law or regulation.

Management is responsible for taking prompt corrective action to investigate and fix any identified weaknesses or problems, as well as to take appropriate disciplinary action whenever necessary to ensure compliance.

E. Compliance, Reporting, Waivers, and Amendments

Any Company employee who has any questions concerning this Code of Conduct or its application should discuss the matter with their immediate supervisor, senior management, Human Resources Department, Compliance Officer or the Chief Legal Officer.

Understand the options you have to raise a concern regarding a suspected violation of law, regulation or Company policy by an employee or other person doing business with the Company. **Conducting Parties have a duty and obligation to report any suspected violation that may occur. Company employees should contact their immediate supervisor, a member of senior management, their Human Resources Department, the Chief Legal Officer (via telephone at (937) 366-2686 or email at josh.carter@atsginc.com) or the Company's Chief Executive Officer (via email at greg.mays@atsginc.com), to report a suspected violation. In lieu of contacting one of the persons described above, employees may report such matters by calling the Company's Compliance and Ethics Hotline (FaceUp) at (833) 501-0940 or using the FaceUp website: <https://faceup.com/c/atsginc>. Reports made using the FaceUp hotline or website can be anonymous. Both the phone number and website are monitored 24 hours a day, 7 days a week.**

Board members should report a suspected violation of law, regulation or Company policy by an employee, board member or other person doing business with the Company directly to the Chief Legal Officer (via telephone at (937) 366-2686 or email at josh.carter@atsginc.com) or on an anonymous basis by calling or emailing the hotline provided in the foregoing paragraph.

Company employees who violate this Code of Conduct are subject to disciplinary action up to and including termination of employment. Managers who fail to perform their responsibilities adequately under this Code of Conduct where this failure contributes to a violation or the continuation of an ongoing violation of law, regulation or Company policy, may be subject to the same degree of discipline.

Contractors, suppliers, and other business partners who violate this Code of Conduct are also subject to disciplinary action up to and including termination of any contract with the Company, initiation of legal proceedings by the Company, and/or filing reports with applicable regulatory or law enforcement authorities.

Any Company employee who is not a director or executive officer of the Company and who seeks a waiver to this Code of Conduct should direct the request to their immediate supervisor, a member of senior management, the Human Resources Department, Compliance Officer or the Chief Legal Officer. No waiver of any portion of this Code of Conduct is effective unless and until such approval is made by the Chief Legal Officer.

The Board has the sole authority to grant waivers to this Code of Conduct for directors and executive officers. Any request by a director or executive officer for a waiver to this Code of Conduct should be directed to the Chief Legal Officer for presentation to the Board.

To the extent this Code of Conduct conflicts with the code of conduct of a subsidiary of Air Transport Services Group, Inc., this Code of Conduct will govern. If the code of conduct (or similar policy) of a subsidiary of Air Transport Services Group, Inc. provides greater specificity than this Code of Conduct, such specificity shall apply to employees of that subsidiary, except to the extent it conflicts with this Code of Conduct.

Any amendment or modification of this Code of Conduct shall require Board notification.

Last Reviewed: April 21, 2026

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