

Management Commitment Statement

Date: May 20, 2026

TO: All Topcast Employees and Business Partners

SUBJECT: Management Commitment Statement

Top Aviation Supplies Limited and its subsidiaries (including Topcast Aviation Supplies Co., Ltd., collectively “**Topcast**”) hereby affirm their enduring commitment to compliance and ethical business conduct across all jurisdictions in which they operate, including but not limited to the United States (US), European Union (EU), United Kingdom (UK), Australia (AU), Singapore (SG), Hong Kong (HK), and the People’s Republic of China (PRC). This commitment forms an integral part of our corporate governance framework and reflects our obligation to comply with applicable laws, regulations, and international standards. The Board of Directors and Executive Team endorse the following principles which guide our global operations.

Code of Conduct and Reporting Integrity

Topcast’s Code of Conduct is the cornerstone of our commitment to ethical behavior across the organization and applies to all employees, officers, and directors. Compliance with this Code is mandatory, and violations may result in disciplinary action in accordance with company policy and applicable law. All personnel must identify, disclose, and appropriately manage any actual or potential conflicts of interest to safeguard the integrity of business decisions.

To foster transparency and accountability, Topcast provides secure, confidential, and anonymous channels for reporting concerns. Individuals are encouraged to raise issues in good faith without fear of retaliation. Retaliation against any person who reports a concern or participates in an investigation is strictly prohibited.

All reports are promptly and thoroughly investigated, and corrective actions are taken where necessary. Whistleblower protections and reporting procedures are clearly communicated to all employees, reinforcing our commitment to a culture of transparency, trust, and ethical conduct. The Code of Conduct and relevant compliance procedures are reviewed and updated regularly to reflect evolving legal requirements, industry standards, and best practices. Employees receive periodic training to ensure awareness and understanding of their responsibilities under the Code.

Export Control and Sanctions Compliance

Topcast acknowledges that international trade is governed by complex regulatory frameworks, including export control laws and economic sanctions administered by authorities such as the U.S. Department of Commerce’s Bureau of Industry and Security (BIS), the Office of Foreign Assets Control (OFAC), the United Nations Security Council and equivalent authorities in other

jurisdictions. Topcast is firmly committed to ensuring that all transactions involving goods, technology, and services are conducted in full compliance with these requirements.

To achieve this objective, Topcast implements robust compliance measures, including but not limited to the thorough screening of customers, suppliers, intermediaries, and all external parties involved in our transactions. We ensure accurate product classification under applicable export control lists and obtain all required licenses prior to any export activities. In addition, Topcast maintains formal policies and procedures, and a comprehensive control matrix embedded within our system to ensure consistent application of these measures. These controls collectively reinforce our dedication to strict adherence to legal and regulatory obligations. Under no circumstances will Topcast tolerate, permit, or engage in any attempt to evade, bypass, or otherwise circumvent applicable sanctions or export restrictions.

Anti-Bribery and Corruption (ABAC)

Topcast adopts a zero-tolerance stance toward bribery, corruption, and facilitation payments and requires strict adherence by its officers and employees in accordance with laws, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, Hong Kong Prevention of Bribery Ordinance, the Criminal Law of the People's Republic of China and the Anti-Unfair Competition Law of the People's Republic of China (AUCL), and any applicable local anti-corruption statutes, each as amended from time to time. No form of bribery, kickbacks, or improper inducements is permitted in any business transaction.

To uphold this commitment, Topcast implements robust controls on gifts, hospitality, and charitable contributions, conducts due diligence on third parties, and requires all employees to complete anti-bribery and corruption training. These measures ensure transparency, mitigate risk, and reinforce our zero-tolerance approach to unethical practices.

Anti-Money Laundering (AML)

Topcast is committed to complying with all applicable anti-money laundering laws and regulations designed to prevent illicit financial activities. To meet these obligations, Topcast implements customer due diligence (CDD) and know-your-customer (KYC) procedures for customers with higher risk exposure and maintains internal controls to mitigate financial crime risks and ensure ongoing monitoring and compliance reviews to ensure adherence to legal obligations.

Data Privacy and Protection

Topcast recognizes its legal and ethical obligation to safeguard personal and confidential information in strict compliance with global data protection laws, including the EU General Data Protection Regulation (GDPR), HK's Personal Data (Privacy) Ordinance (PDPO), China's Personal Information Protection Law (PIPL), and all other applicable privacy regulations. We ensure that all collection, processing, and transfer of personal data is lawful, transparent, and purpose-driven. In addition, Topcast delivers mandatory data security and protection training to employees to reinforce compliance and accountability.

Competition and Antitrust Compliance

Topcast maintains a fair and competitive marketplace in full compliance with applicable antitrust and competition laws. Any form of anti-competitive behavior is strictly prohibited, including but not limited to the price fixing, bid rigging, market allocation, or other unlawful practices. Compliance is not merely about avoiding violations, it is an integral part of our commercial strategy. Employees engaged in sales, procurement, or strategic negotiations must ensure that all interactions with competitors, customers, and business partners uphold both the letter and the spirit of competition laws. Through these principles, Topcast protects market integrity and strengthens trust in our business relationships.

Environmental, Social and Governance (ESG)

Topcast is dedicated to embedding sustainability and ethical responsibility into its distribution and repair service operations. We actively implement practices that reduce environmental impact, promote social accountability, and uphold strong governance standards throughout our global supply chain. In line with these commitments, Topcast strives to reduce carbon emissions and optimize resource utilization in logistics and warehousing, foster diversity, equity, and inclusion within our workforce, and ensure that all sourcing and procurement activities meet the ethical and compliance standards.

The Board and Executive Team are dedicated to ensuring adequate resources, maintaining strong oversight, and continuously enhancing our compliance program. Compliance is a collective responsibility, and we expect all employees and business partners to uphold these standards.

For and on behalf of the Board of Directors



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Chief Executive Officer