



January 28, 2014

TO: Fellow SkyLink Aviation Inc. Professionals

The Board of Directors (the "Board") of SkyLink Aviation Inc. ("SkyLink") approved amendments to SkyLink's Code of Business Conduct and Ethics ("Code") which includes our Anticorruption Compliance Policy and Procedures Manual.

All of SkyLink's employees, officers and directors must read and use this Code to ensure that each business decision follows our commitment to the highest ethical standards and the law. Failure to take SkyLink's annual FCPA/CFPOA/ Code and Bill 168 training can result in loss of any potential bonus and even termination of your employment. Adherence to this Code and to our other official policies is essential to maintaining and furthering our reputation for fair and ethical practices among our customers, shareholders, employees and communities.

The Board and SkyLink's senior management firmly believe that no individual or entity connected to SkyLink its subsidiaries or its joint ventures has any duty that is more critical than compliance with the Code any and all statutes that prohibit corrupt conduct.

It is the responsibility of every one of us to comply with all applicable laws and regulations and all provisions of this Code and the related policies and procedures. Any individual or entity that fails to comply with the Code and anticorruption laws does so at enormous personal risk and seriously endangers SkyLink.

Each of us must report any violations of the law or this Code. Failure to report such violations and failure to follow the provisions of this Code may have serious legal consequences and will be disciplined by SkyLink and SkyLink will deal with any such violations or failures to report promptly and strictly. Discipline may include termination of your employment.

The Code addresses many but not all of the issues that may arise in connection with the application of the Policies and Procedures (as defined in the Anticorruption Compliance Policy contained in the Code.) Situations that involve ethics, values and violations of certain laws are often very complex. **WHEN IN DOUBT – ASK!** Teresa Champion, Company Counsel and Chief Compliance officer can be reached at **00+1+703.318.4001**.

If you do not understand a provision of this Code, are confused as to what actions you should take in a given situation, or wish to report a violation of the law or this Code, you should follow those compliance procedures. Those procedures will generally direct you to talk to either your immediate supervisor or the Chief Compliance Officer, Teresa Champion at **00+1+703.318.4001**. There are few situations that cannot be resolved if you discuss them with your immediate supervisor or the Chief Compliance Officer in an open and honest manner.

WHEN IN DOUBT – ASK! Teresa Champion, Company Counsel and Chief Compliance Officer

00+1+703.318.4001.