



A E R A L I S

COMPANY STATEMENT

Anti Bribery and Corruption

AERALIS is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. AERALIS has a zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships whatever country we operate in.

AERALIS will uphold all laws relating to bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK including the Bribery Act 2010 with regard to our conduct both at home and overseas.

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees, consultants, contractors must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager.

Additionally under the Bribery Act 2010 AERALIS could be guilty of 'failure to prevent bribery' if someone associated with AERALIS is found guilty of bribery which was intended to obtain or keep business or a business advantage for AERALIS, even though AERALIS did not authorise that activity and even if they were unaware of it. The defence that AERALIS may use in such circumstances is if it is able to show that AERALIS had 'adequate procedures' in place designed to prevent such unauthorised activity.

AERALIS will do all it reasonably can to ensure it deals with reputable, honest and ethical people and organisations by making appropriate enquiries to identify any such risks.

Additionally, AERALIS will take appropriate steps to ensure that all employees, consultants and contractors are aware of AERALIS' anti bribery and corruption policy

AERALIS recognises that bribery and corruption are punishable by up to ten years imprisonment and a fine. If our company is found to have taken part in corrupt activities we may be subjected to an unlimited fine, be excluded from tendering for public contracts and face serious damage

T H E F U T U R E O F A I R F O R C E F L E E T S

to our reputation. We commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

Our policy is developed in accordance with the six principles set out by the Ministry of Justice in its guidance to the Bribery Act 2010.

1. Proportionate procedures – procedures to prevent bribery by persons associated with it are proportionate to the bribery risks it faces and to the nature, scale and complexity of the commercial organisation’s activities. They are also clear, practical, accessible, effectively implemented and enforced.
2. Top-level commitment. The top-level management of the business (be it a board of directors, the owners or any other equivalent body or person) are committed to preventing bribery by persons associated with it. They foster a culture within the organisation in which bribery is never acceptable.
3. Risk Assessment – assessing the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment is periodic, informed and documented.
4. Due diligence. – applying due diligence procedures, taking a proportionate and risk-based approach, in respect of persons who perform or will perform services for or on behalf of the organisation, to mitigate identified bribery risks.
5. Communication (including training) – ensure that its bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication, including training, that is proportionate to the risks it faces.
6. Monitoring and review. – monitor and review procedures designed to prevent bribery by persons associated with it and make improvements where necessary.

Application of Policy

Our anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Mandatory training is provided to and undertaken by all AERALIS employees, sales associates and Board members.

