

## **Anti-bribery and Anti-corruption policy (Issue 2 – June 2020)**

Aeromet will operate with the highest integrity in terms of dealings with customers, suppliers, employees, and any other stakeholders. This policy outlines the principles of bribery and corruption and explains the measures Aeromet will take to ensure its employees operate in an ethical manner.

### **What is bribery?**

A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Act, namely:

- giving or offering a bribe;
- receiving or requesting a bribe; or
- bribing a foreign public official.

### **Gifts and hospitality**

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from Third Parties unless otherwise specifically stated. Any gifts or hospitality:

- must not be made with the intention of improperly influencing a third party or worker to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- must comply with local law in all relevant countries;
- must be given in the name of the organisation, not in an individual's name;
- must not include cash or a cash equivalent;
- must be appropriate in the circumstances;
- must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift;
- must be given openly, not secretly; and
- in the case of gifts, they must not be offered to, or accepted from, government officials or representatives, politicians or political parties, without the prior approval of the Aeromet Chief Executive Officer or Chief Financial Officer

Aeromet appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable both in the UK and any other relevant country. The intention behind the gift should always be considered.

## **What is not acceptable?**

It is not acceptable for any worker (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or the Aeromet will improperly be given a business advantage, or as a reward for a business advantage already improperly given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure;
- accept payment from a third party where it is known or suspected that it is offered or given with the expectation that the third party will improperly obtain a business advantage;
- accept a gift or hospitality from a third party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by Aeromet in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

## **Facilitation payments and “kickbacks”**

Aeromet does not make, and will not accept, facilitation payments or “kickbacks” of any kind, such as small, unofficial payments made to secure or expedite a routine government action by a government official, or payments made in return for a business favour or advantage.

## **Charitable Donations and Sponsorship**

Aeromet only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices and which are in accordance with Aeromet’s internal policies and procedures.

## **Record keeping**

Aeromet keeps appropriate financial records and has appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

## **Responsibilities and raising concerns**

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Workers are required to notify Aeromet as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, are

asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. Aeromet reserves the right to terminate our contractual relationship with non-employee workers if they breach this policy.

If any third party is aware of any activity by any worker which might lead to, or suggest, a breach of this policy, they should raise their concerns with Aeromet's Chief Executive Officer or Chief Financial Officer.

Signed on behalf of Aeromet International Limited

Signature:

A handwritten signature in blue ink, appearing to read "Howard Kimberley", written over a faint horizontal line.

Name: Howard Kimberley

Position: Chief Executive Officer

Date:

A handwritten date in blue ink, "July 2016", written over a faint horizontal line.