



## ANTI-FRAUD & BRIBERY POLICY STATEMENT

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**ANTI-FRAUD AND BRIBERY POLICY STATEMENT** The reputation of Air³ Limited for lawful and responsible business behaviour is of paramount importance and is one of its greatest assets. Air³ Limited is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices.

The Company has zero tolerance towards such behaviour. Losses due to fraud, bribery and all other corrupt business practices can be more than just financial in nature; they can potentially damage the Company's reputation as well.

The Company expects all employees and sub-contractors to:

- Act honestly and with integrity at all times and safeguard the Company resources for which they are responsible;
- Respect Air³ Limited customers, suppliers and other parties with whom it must interact to achieve its objectives by conducting business in an ethical, lawful and professional manner.

Within the Company, the responsibility to control the risks of unethical business practices occurring resides at all levels of the organisation.

The Company prohibits unethical conduct. We will:

- Communicate of a code of conduct to employees;
- Report and investigate allegations of fraud, bribery and other corrupt practices;
- Apply appropriate disciplinary procedures for employees who are found to have engaged in such practices;
- Monitor the effectiveness of such controls.

Air³ Limited will endeavour to take appropriate steps to ensure that all employees and sub-contractors:

- Meet all legal and regulatory requirements governing the lawful and ethical conduct of business;
- Ensure all breaches or suspected breaches are fully investigated and if appropriate, invoke disciplinary measures and take prompt action to remedy the breach and prevent any repetition;
- Provide information to all employees and further guidance if they have any questions or uncertainty regarding these requirements;
- Provide information to all employees on the procedures available to them to report any breach or suspected breach.

Air³ Limited expects that employees and sub-contractors do not engage in any illegal, improper or questionable conduct.

They must not receive, offer, promise, improperly influence payment, authorise payment or contract award (directly or indirectly), in return for anything of value, for example a bribe/kickback.

They must:

- Prohibit payments including 'facilitating' or 'expediting' payments to others in order to secure prompt or proper performance of routine duties;
- Prohibit the use of purchase orders or consulting agreements which channel payments or otherwise improperly reward customers or suppliers or their relatives or business associates;
- Ensure transactions are properly and accurately recorded

Peter Morgan  
Managing Director

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