

## ANTI-FRAUD AND BRIBERY POLICY STATEMENT

At Air<sup>a</sup> Limited, safeguarding our reputation for lawful and responsible business conduct stands as a cornerstone of our values. We are resolute in our commitment to prevent, deter, and detect instances of fraud, bribery, and all forms of corrupt practices. Our stance on such behaviour is unequivocal: zero tolerance.

We acknowledge that the ramifications of fraud, bribery, and corruption extend beyond mere financial loss; they can tarnish the very fabric of our Company's reputation. Therefore, Air<sup>3</sup> Limited holds every employee and subcontractor to the highest standards of honesty, integrity, and ethical conduct, reinforcing the following expectations:

- Act with unwavering honesty and integrity, diligently safeguarding the Company's resources entrusted to them.
- Treat Air<sup>3</sup> Limited's customers, suppliers, and all stakeholders with respect, conducting business ethically, lawfully, and professionally.
  - Within our organization, the responsibility for mitigating the risks associated with unethical business practices rests at every level. We adamantly prohibit such conduct, underscoring our commitment through the following measures:
- Communicate and uphold a clear code of conduct for all employees.
- Promptly investigate and address any allegations of fraud, bribery, or corruption.
- Implement appropriate disciplinary measures against employees found engaging in such practices.
- Continuously monitor and enhance the effectiveness of our controls.
  Air<sup>3</sup> Limited is dedicated to ensuring that all employees and subcontractors adhere to legal and regulatory requirements governing ethical business conduct. To this end, we pledge to:
- Thoroughly investigate and address any breaches or suspected breaches of legal and ethical standards.











Anti-Fraud & Bribery Policy

- Provide comprehensive guidance to employees and subcontractors, addressing any questions or uncertainties regarding these requirements.
- Equip all employees with information on available reporting procedures for any breaches or suspected breaches.

We expect our employees and subcontractors to uphold the highest standards of conduct, refraining from any form of illegal, improper, or questionable behavior. Specifically, they are prohibited from:

- Accepting, offering, promising, or improperly influencing payments or contracts, directly or indirectly, in exchange for anything of value, such as a bribe or kickback.
- Engaging in 'facilitating' or 'expediting' payments to secure prompt or proper performance of routine duties.
- Utilizing purchase orders or consulting agreements to illicitly reward customers, suppliers, or their associates.

Furthermore, we emphasize the importance of accurately recording all transactions, ensuring transparency and accountability across all our dealings.

At Air<sup>3</sup> Limited, we stand united in our commitment to upholding the highest ethical standards and preserving the trust and integrity upon which our Company is built.

Signed:

For and on behalf of Air3 Limited Peter Morgan -

Managing Director

Date: February 2025







