



AUTHORISED BEECHCRAFT REPRESENTATIVE



# ABSOLUTE AVIATION GROUP



AUTHORISED CESSNA REPRESENTATIVE

Anti-Bribery and Corruption Policy		
Policy #: GP_LEG1701	Effective date: 24 February 2017	Last Revision: June 2019
Policy Custodian:	Legal Department	

## Purpose:

There are two primary objectives of this policy:

1. To set out the minimum required standards for preventing bribery and corruption within the Absolute Aviation Group;
2. To provide a summary of the statements and policies that are relevant, in whole or in part, to address anti-bribery and corruption requirements in the Absolute Aviation Group.

This policy reflects not only our cultural and ethical commitment to preventing bribery but also compliance with applicable legal and regulatory requirements in various jurisdictions in which the Absolute Aviation Group Operates.

This policy serves to guide and reinforce the ethical conduct of our employees, contractors and consultants by setting forth the Absolute Aviation Group's zero-tolerance of bribery and corruption.

## Scope:

The policy applies to all employees within the Absolute Aviation Group. The scope of this policy is all business activities conducted within the Group whether with the private or public sector.

## Regulatory Background:

Bribery is a commercial offence in many countries and corrupt acts expose the Absolute Aviation Group and its employees to the risk of prosecution, substantial fines and imprisonment, as well as endangering the reputation of the business.

The King IV Report on Corporate Governance recommends a hybrid form of governance that meets regulatory requirements and incorporates appropriate voluntary standards of excellence as defined in codes of practice. Absolute Aviation Group supports this recommended compliance framework and meets both regulatory and voluntary standards of excellence in its drive to prevent bribery and corruption in all its business operations worldwide.

The Absolute Aviation Group supports the objectives of the South African legislation of 2004 on the Prevention and Combating of Corrupt Activities Act and the Organisation for Economic Cooperation and Development (OECD) Anti-Bribery Convention, to which South Africa is a signatory.



The policy recognises all applicable legal and regulatory requirements in the countries in which the Absolute Aviation Group operates. It recognises the requirements of the UK Bribery Act, the US Foreign Corrupt Practices Act and other legislation which may be specific to certain any of the Absolute Aviation Group entities and/or operations.

### Definitions:

**Bribery:** *Where a person offers, promises, gives or receives, demands, solicits or accepts something of value, whether it is a financial or other advantage to/from another person with the intention to bring about the improper performance by that other person of a relevant function or activity or to reward such improper performance. It also includes situations where the offer or acceptance of the advantage is in itself improper.*

**Corruption:** *The abuse of power for personal gain. Bribery and fraud are aspects of corrupt practices.*

**Associated person:** *Person who performs services for or on behalf of the organisation.*

### Policy Statement:

#### **1. The Absolute Aviation Group policy on Anti-bribery and Corruption:**

- 1.1. The Absolute Aviation Group is committed to maintain the highest standards of honesty, integrity and ethical conduct;
- 1.2. The Absolute Aviation Group is committed to fight against bribery and corruption, in both private and public sector transactions;
- 1.3. The Absolute Aviation Group and its employees confirm that in dealing with public officials, other corporations and private citizens, we will not seek to influence others, either directly or indirectly, by paying or receiving bribes or kickbacks, including but not limited to payments to local officials by Absolute Aviation Group employees or agents for the completion of routine governmental administrative action (so-called facilitation payment), or by any other measure that is unethical or that will tarnish our reputation for honesty and integrity. Even the appearance of such conduct must be avoided;
- 1.4. Unethical conduct may or may not constitute illegal or corrupt behaviour. The Absolute Aviation Group's Code of Conduct defines ethical behaviour and requires standards of conduct.

#### **2. Procedures for preventing Bribery and Corruption:**

- 2.1. The procedures adopted by the Absolute Aviation Group to prevent bribery and corruption include applying appropriate due diligence procedures and taking a risk based approach to ensure compliance with all applicable laws and regulations relates to anti-bribery and corruption;
- 2.2. A high-level risk assessment is implemented to assess key compliance risks including the risks of bribery and corruption and any other related risks in applicable legislation;



2.3. The response to the risk assessments is proportionate to the related business risk, the business context and surrounding circumstances. Each Absolute Aviation Group company, division or business unit is responsible for implementing a proportionate response, including, but not limited to:

- Annual Training and communication of policies that is comprehensive and ongoing;
- Procedures to prevent and detect bribery and corruption, including procedures to prevent facilitation payments;
- Approved guidelines on contractual arrangements with third parties in high risk areas and other associated persons, including requirements for compliance with all applicable laws and regulations related to anti-bribery and corruption.
- Procedures to monitor and review processes including the investigation, response and reporting of violations, incidents and other weaknesses as well as implementing areas for improvement.

#### **Roles and Responsibilities:**

Management of each company, division and business unit have the responsibility to ensure compliance with this policy and the discretion to define the process, procedures and other mechanisms by which the policy is implemented.

It is the responsibility of operational management to ensure that all procedures are implemented in accordance with this policy and divisional policies, where applicable.

#### **Raising concerns and seeking guidance:**

If any person becomes aware of a circumstance or action that violates or appears to violate this policy on bribery and corruption, they are encouraged to contact their supervisor or manager.

Absolute Aviation Group is committed to ensure that no employee suffers any occupational detriment as a result of reporting a genuine concern in good faith.

#### **Breach of Policy**

It is the responsibility of every employee to comply with this policy and failure to do so could amount to gross misconduct and a material breach of the contract of employment.

Furthermore, Absolute Aviation Group could be held criminally liable for failing to prevent bribes wherever in the world they are paid. The penalties for a corporate body that fails to prevent bribery are severe and including criminal liability, an unlimited fine and serious reputational damage.

All cases of alleged bribery and corruption will be investigated and followed up by the application of all available remedies. Employees who commit an act of bribery or corruption, violate the Absolute Aviation Group's Code of Conduct or breach this policy will be subject to disciplinary action, up to and including termination with cause.

#### **Approval and Ownership**



Owner	Title	Date
Alida Reynecke	Group Legal Advisor	15 February 2017
Approved By	Title	Date
Neil Howard	Group Chief Executive Officer	24 February 2017

#### Revision History

Version	Revision Date	Description	Next review Date
V1.0	Annually		Next review: February 2018
V1.1	January 2018	Revision done	January 2019
V1.2	January 2019	Revision done	January 2020
V1.2	June 2019	Letterhead change	June 2020