



Anti-Bribery and Corruption Policy INTRODUCTION

The Ethics Policy establishes the ethical standards of A1R Services Limited and underpins the behaviours we expect of everyone engaged by us when conducting business on our behalf. It is a statement of how we strive to ensure we maintain our reputation as a good corporate citizen. That policy reinforces our Vision & Philosophies and enables us to build and maintain the first class reputation that our customers, employees and suppliers are entitled to expect of us. Our ethical approach affects all areas of the Company. This Anti-Bribery and Corruption Policy and Procedure ("the Anti-Bribery Policy") forms part of our Ethics Policy and represents a commitment to doing what is right.

When working for A1R Services Limited, you are agreeing and are obliged to:

- uphold this commitment;
- ensure you understand the requirements of Anti-Bribery Policy and the standards, instructions and associated compliance processes; and
- always follow them.

OUR POLICY STATEMENT ON BRIBERY AND CORRUPTION

Policy statement

The Company expects its employees to demonstrate honesty, integrity and fairness in all aspects of their business dealings and exercise appropriate standards of professionalism and ethical conduct in all their activities. The Company expects the same approach to doing business from its business partners and suppliers.

Pursuant to this the Company will not tolerate bribery¹ or corruption² in any form and has a 'zero tolerance' approach to any breach of this policy.

Application

This means that the Company and its employees will never seek, accept or give a bribe, facilitation payment, kickback or other improper payment. We must also always ensure that we operate with appropriate transparency in all our business dealings.

If you are in any doubt as to whether something is appropriate ask yourself how your fellow employees would view your conduct, or how you would feel if your conduct featured on the front page of a national newspaper. If you are in any doubt as to whether something is right ask your line manager or seek guidance from the HR dept. or Legal specialist. If you are still uncomfortable or are concerned by the actions of others you can also use the confidential Whistleblowing helpline at 0800 915 1571 if you consider that it would be inappropriate to report the issue through line management or have any concern about confidentiality.



Our Policy

We will take appropriate steps to ensure that:

1. We do not, directly or indirectly, offer, promise, give, accept or demand a bribe or other undue advantage (including excessive gifts and hospitality) in order to obtain or retain business, or gain any other improper advantage.
2. We do not offer, nor give in to demands, to make illicit or illegal payments to agents, public officials (at whatever level), or the employees of business partners or anybody else that we do business with.
3. We engage and remunerate agents and other third parties only for legitimate services and adopt appropriate transparency in our approach.
4. We promote employee awareness of, and compliance with, company policies against bribery and corruption through appropriate dissemination of our own procedures (including disciplinary procedures) policies and training programmes on induction and subsequently.
5. We adopt management control systems that discourage bribery and corruption, and adopt financial and tax accounting and auditing practices that prevent the establishment of "off the books" secret accounts or the creation of documents which do not properly and fairly record the transactions to which they relate.
6. We do not make illegal or inappropriate contributions to candidates for public office or to political parties or to other political organisations.
7. We raise awareness of the need to combat bribery and corruption with our business partners by publication of this Policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption.

Jason McMullen Managing Director
A1R Services Limited
August 2011

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A1R Services Limited
August 2011

1 Definition: The receiving/offering/giving/providing/requesting/accepting of a financial or other advantage, in order to seek to induce a person or to induce a person to give improper assistance in breach of their duty, or to otherwise influence someone with the underlying purpose of obtaining/retaining business, or an advantage in the course of business. "Bribery" for this purpose includes so-called "facilitation" or "grease" payments, defined as non-discretionary payments made



to government or public officials to speed up routine administrative processes, even if such payments are nominal in amount.

2 Definition: The misuse of entrusted power/breach of duty for personal gain