



# ANTI-BRIBERY AND CORRUPTION POLICY

## Introduction

HeliOperations conducts all of its business in an honest and ethical manner, taking a zero-tolerance approach to bribery and corruption. It is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery, complying with the Bribery Act 2010 in respect of its conduct both at home and abroad.

The purpose of this policy is to:

- a) set out the responsibilities of the Company, and of those working for it, in observing and upholding its position on bribery and corruption; and
- b) provide information and guidance to those working for HeliOperations on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals. If the Company is found to have taken part in corruption, it could face an unlimited fine as well as damage to its reputation. It therefore takes its legal responsibilities very seriously.

In this policy, 'Third Party' means any individual or organisation that staff come into contact with during the course of their work, and includes (but is not limited to) suppliers, business contacts, agents, advisers, and government and public bodies.

## Who is covered by the Policy?

This policy applies to all individuals working for the Company at all levels (whether permanent, fixed-term or temporary), and includes volunteers, agents or any other person associated with the Company (collectively referred to as "Employees" in this policy).

## What is Bribery?

The Act defines bribery as giving or receiving a financial or other advantage in connection with the 'improper performance' of a position of trust, or a function that is expected to be performed impartially or in good faith.

## Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

The giving or receipt of gifts or hospitality is permitted if all of the following requirements are met:

- if it is of a value in excess of £100 then it is recorded in the Hospitality Book, which is kept in the Office and reviewed regularly by the Directors;
- it complies with local law;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers) unless specifically authorised by the CEO;
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- gifts should not be offered to, or accepted from, government officials or representatives without the prior approval of the CEO.

HeliOperations 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 and the intention behind the gift should always be considered.

### **What is Not Acceptable?**

It is not acceptable for an Employee (or someone on his/her behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that an advantage for the Company will be received, or to reward an advantage already received;
- 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 that he/she knows or suspects is offered with the expectation that it will obtain an advantage for them;
- accept a gift or hospitality from a third party if he/she knows or suspects that it is offered or provided with an expectation that a business advantage will be provided by the Company in return;
- engage in any activity that might lead to a breach of this policy.

### **Donations**

The Company only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made in the Company's name or on behalf of the Company without the prior approval of the CEO.

### **An Employee's Responsibilities**

All Employees must ensure that he/she reads, understands and complies with this policy.

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 Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

An Employee must notify the CEO as soon as possible if he/she believes or suspects that a breach of this policy has occurred, or may occur in the future.

Any Employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other Employees if they breach this policy.

### **Record-keeping**

The Company keeps financial records and all Employees must make their line manager aware and keep a written record of all hospitality or gifts accepted or offered, which will be subject to review.

### **How to Raise a Concern**

All Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Concerns should be reported by following the procedure set out in the Whistle Blowing Policy.

### **Protection**

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.