



GULF AIRCRAFT & ENGINEERING SERVICES

Anti-Bribery and Corruption Policy



REVISION 00

June 2024

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Gulf Aircraft & Engineering Services (GAES) (FZE) Anti-Bribery and Corruption Policy

1. Policy Statement

1.1 Gulf Aircraft & Engineering Services (GAES) (FZE) adopts a zero-tolerance approach to bribery and corruption. This policy extends to all business dealings and transactions in all countries and territories in which we operate. In case of any conflict between this policy and the laws of any country where business is conducted, the higher standard should always be applied.

1.2 In accordance with this policy and relevant laws and regulations, GAES shall:

(a) Not provide, solicit, or accept payments, gifts, or entertainment that constitute bribery, as defined herein;

(b) Maintain systems and controls designed to deter and minimize the risk of bribery;

(c) Make employees fully aware of the anti-bribery policy and foster an anti-bribery culture within GAES, featuring zero tolerance of bribery;

(d) Provide appropriate mechanisms for employees, clients, contractors, and any third parties to report suspected bribery or corruption, ensuring protection for those who do so.

2. Scope of Policy

2.1 This policy applies to all employees of GAES (whether permanent or temporary) and all business partners, including consultants, contractors, agents, suppliers of goods and services, customers, and any third parties.

3. Definition of “Bribe”

3.1 A bribe includes payment, offers, or promises to pay or provide anything of value, directly or indirectly, to obtain an improper personal or business advantage. GAES prohibits both the payment, offer, authorization of a bribe, as well as the receipt or acceptance of a bribe.

3.2 “Anything of value” should be interpreted broadly to include anything (whether monetary or non-monetary) that provides a benefit to the recipient. This may include favours, loans, loan guarantees, use of property, job offers, political contributions, or payment of expenses or debts.

4. Reporting Mechanisms

4.1 Employees, customers, contractors, and any third parties must report immediately when they:

(a) Uncover an instance of bribery;

(b) Suspect that a bribe has been, or is in the process of being, paid or received, or merely discussed;

(c) Receive or otherwise become aware of information suggesting that a bribe is in the process of being paid or received, or merely discussed.

4.2 Equally, reports must be made when:

(a) A related breach of policies and procedures has occurred;

(b) Information suggests that a related breach of policies and procedures has been or is in the process of being committed.

4.3 Reports can be made anonymously through the following:

Anonymous Hotline: +971 6 591 2601

Anonymous Email: anonymous@gaes.ae

4.4 Confidentiality and Anonymity: GAES is committed to protecting the identity of anyone who reports suspected instances of bribery or corruption. To ensure confidentiality and anonymity, the following measures are in place:

- **Dedicated Reporting Channels:** To ensure that reports are handled confidentially and effectively, GAES provides dedicated channels, specifically the hotline and email addresses listed in section 4.3, for reporting suspected bribery or corruption. These channels are managed by an independent compliance officer, ensuring the confidentiality of the reporter's identity and safeguarding against unauthorized access. This arrangement allows reporters to safely communicate their concerns through familiar and secure methods.
- **Encrypted Communications:** All communications through these channels are encrypted, ensuring that the details of the report and the identity of the reporter remain confidential. Access to this information is restricted to a select group of compliance officers who are specially trained in handling sensitive information.

4.5 Encrypted Communications: All communications through these channels are encrypted, ensuring that the details of the report and the identity of the reporter remain confidential. Access to this information is restricted to a select group of compliance members who are specially trained in handling sensitive information.

5. Escalation and Investigation

5.1 All reports will be treated in confidence and fully investigated. Every effort will be made to maintain anonymity if requested, although anonymity may be difficult to preserve if, as a result of investigations, the authorities are informed, or disciplinary action is taken.

5.2 Once a report is made, the matter should not be discussed with any person other than those responsible for investigating it until the information is made public.

5.3 Managers must act promptly upon receiving concerns and notify the reporting individual of any action taken. If further investigation is not deemed appropriate, a prompt and full explanation must be provided.

6. Responsibility of Managers

6.1 Managers have full authority to implement this policy within their areas of responsibility. Measures may include:

(a) Devising, implementing, and maintaining systems and controls to prevent bribery, minimize risk, and detect instances of bribery;

- (b) Ensuring employees are aware of GAES's anti-bribery policies and procedures;
- (c) Ensuring employees participate in anti-bribery training specific to their needs or job functions.

7. Responsibility of Employees

7.1 Employees are expected, as part of their normal duties, to:

- (a) Familiarize themselves with GAES's anti-bribery and related policies;
- (b) Participate in any anti-bribery training provided;
- (c) Comply with any policy and procedure manuals relevant to their jobs;
- (d) Immediately report any actual or suspected bribe;
- (e) Immediately report any allegation of bribery made by a third party;
- (f) Immediately report any breaches of policies and procedures.

8. Compliance and Consequences

8.1 The consequences of non-compliance with this policy could be severe. For an employee guilty of bribery:

- (a) The employee may face criminal penalties, including imprisonment and fines, varying according to the offence and its seriousness..
- (b) The employee will be subject to disciplinary action and potential dismissal for gross misconduct, resulting in loss of salary, bonus, pension entitlement, and other benefits.
- (c) The employee will be liable to civil legal action for the recovery of any misappropriated sums and/or for damages for any loss or damage suffered by the victim.

9. Communication and Training

9.1 GAES seeks to clarify to its employees the requirements of this policy through communication, consultations, and training. GAES encourages active participation of employees in developing and improving anti-bribery procedures.

10. Contact Information

10.1 For any questions regarding this policy or related policies, please contact:

GAES Compliance Officer: compliance@gaes.ae

10.2 A copy of all related policies can be obtained from the Compliance Officer.

LIST OF EFFECTIVE REVISIONS

SECTION	SUB- SECTION	Actual Revision	Date of revision
1. Policy Statement	1.1.	Rev 00	01 June 2024
1. Policy Statement	1.2.	Rev 00	01 June 2024
2. Scope of Policy	2.1.	Rev 00	01 June 2024
3. Definition of "Bribe"	3.1.	Rev 00	01 June 2024
3. Definition of "Bribe"	3.2.	Rev 00	01 June 2024
4. Reporting Mechanisms	4.1.	Rev 00	01 June 2024
4. Reporting Mechanisms	4.2.	Rev 00	01 June 2024
4. Reporting Mechanisms	4.3.	Rev 00	01 June 2024
4. Reporting Mechanisms	4.4.	Rev 00	01 June 2024
4. Reporting Mechanisms	4.5	Rev 00	01 June 2024
5. Escalation and Investigation	5.1.	Rev 00	01 June 2024
5. Escalation and Investigation	5.2.	Rev 00	01 June 2024
5. Escalation and Investigation	5.3.	Rev 00	01 June 2024
6. Responsibility of Managers	6.1.	Rev 00	01 June 2024
7. Responsibility of Employees	7.1.	Rev 00	01 June 2024
8. Compliance and Consequences	8.1.	Rev 00	01 June 2024
9. Communication and Training	9.1.	Rev 00	01 June 2024
10. Contact Information	10.1	Rev 00	01 June 2024
10. Contact Information	10.2.	Rev 00	01 June 2024