

## Anti-bribery and corruption Policy

### Policy Brief & Purpose

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

This policy defines Star Aviation Services position on bribery and corruption in the workplace, to ensure managers and workers understand their obligations.

There are two primary objectives of this policy:

1. To set out the minimum required standards for preventing bribery and corruption within the company of Star Aviation;
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 at Star Aviation.

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 Star Aviation operated.

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

### Scope

This policy applies to all employees and contractors of Star Aviation. It also applies at any Star workplace (which may be Star premises, a client's premises or another place where work-related activities are conducted); and to conduct outside of work, when that conduct has the potential to affect workplace relationships or the workplace environment.

### Definitions of bribery and corruption

#### *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.

## Star Aviation's commitment

Star is committed to ensuring a working environment free of bribery and corruption.

- 1.1. Star Aviation is committed to maintain the highest standards of honesty, integrity and ethical conduct;
- 1.2. Star Aviation is against bribery and corruption;
- 1.3. Star Aviation, its employees and contractors confirm that they will not seek to influence others, either directly or indirectly, by paying or receiving bribes or kickbacks, including but not limited to payments by Star Aviation employees or contractors 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. Star Aviation's Code of Conduct defines ethical behaviour and requires standards of conduct.

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the intention of influencing, inducing or rewarding improper performance;
- 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 (where the payment is not a legitimate payment pursuant to local written law);
- accept a payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them which will be obtained through improper performance by you or Star Aviation;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with the intention of influencing improper performance by you or us in return;
- threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

## Responsibility and commitment to promptly investigate

All Star Aviation employees and contractors have a responsibility to detect, prevent and report instances not only of bribery and corruption, but also of any other suspicious activity or wrongdoing in connection with Star Aviation.

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. Report the issue or concern to your direct Manager. If it involves your direct Manager, please raise to [hr@staraviationservices.com.au](mailto:hr@staraviationservices.com.au)

Star commits to promptly, fairly and impartially investigating any reports of bribery or corruption.

## Record Management

Star Aviation must keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

All accounts, invoices, notes and other documents and records relating to dealings with third parties, such as customers, suppliers and business contacts, should be prepared and maintained with accuracy and completeness. No accounts are to be kept “off the record” to facilitate or conceal any improper payments. You must ensure all expense claims incurred to third parties are submitted in accordance with the Records Management Policy.

## Consequences of breach of this policy

Disciplinary action will be taken against a person who is found to engage or be associated with bribery or corruption.

