



ANTI-CORRUPTION POLICY

Global Helicopter Service GmbH is a German based international aviation operator, approved by EASA, specialising in a wide range of commercial helicopter services primarily based on the Bell 412/212. As our main business activities are abroad, we are regularly faced with business practices which do not correspond to the GHS commitment to ensure that we conduct business in accordance with highest professional and ethical standards.

In our daily operations we are frequently confronted with unfair and corrupt practices. Avoiding and preventing these corrupt practices now and in the future is essential to ensure the protection of the general business climate as well as GHS's credibility in the eyes of our customers. Adherence to good governance creates an environment where corruption struggles to flourish in so doing protecting sustainable economic development, ethical values and justice, the negative effect on society and the rule of law. GHS are committed to strong business values and ethical behavior thereby ensuring the competitive advantages of transparency, a cleaner corporate image, more trustworthy business relationships, lower costs and no exposure to lawsuits.

The law alone is not enough to end corruption and this GHS ANTI CORRUPTION POLICY will guide our company to avoid and counteract corruption and bribery. We support the concept that every company has to implement its own anti-corruption regulations reinforce good governance and avoid corrupt practices within its own structure to prevent the immediate and direct costs to the company and the broader commercial effects of corruption on the market sector.

Global Compact

As a signatory to the United Nations Global Compact, Global Helicopter Service GmbH is actively engaged with other companies and nongovernmental organizations in the fight against corruption. We support the Global Compact's 10 principles and in particular "Principle 10" which states: "Businesses should work against corruption in all its forms, including extortion and bribery."

Our ANTI CORRUPTION POLICY should be seen in this context. The executive board as well as the management of Global Helicopter Service GmbH are aware of their responsibilities and have created the following codex to avoid corrupt business practices. The principles apply to all individuals working at Global Helicopter Service GmbH or any other business partners and officials associated with Global Helicopter Service GmbH.

A handwritten signature in blue ink, appearing to be 'D. Goldfuss', is positioned above the name and title of the CEO.

Dominik Goldfuss
CEO, Global Helicopter Service GmbH

Human Rights

Global Helicopter Service GmbH devoutly respects the international proclaimed human rights. Especially for our Africa-based team it is very important to make sure that no human rights be will be abused, neither in their proximity, nor in their periphery.

Labour

In promoting equal opportunity for all we help create an inclusive and ethical culture. We respect the dignity and individual rights of employees and third parties with whom we have business relations. We uphold both the right to freedom of association and the right to engage in collective bargaining in accordance with applicable laws and regulations. We condemn forced or child labour and any form of exploitation or discrimination and strictly comply with applicable laws.

Environment

We strive for environmentally responsible procurement and are always attempting to use natural resources in order to perform our services sustainable. We provide a healthy and safe workplace for our employees by complying with all applicable health and safety laws and our Safety Management Manual (SSM).

Anti-Corruption

Global Helicopter Service GmbH takes a zero tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and to implementing and enforcing effective systems to counter bribery. We adhere to all laws relevant to countering bribery and corruption and are bound by the laws of the German Federal Republic. We take our legal responsibilities very seriously. Invariably all of our suppliers must comply with the anti-corruption laws that govern operations in the countries in which they do business. A business practice is considered “corrupt” if other than normal legal methods are used to achieve an objective, especially if someone is bribed.

According to § 334 StGB together with the Law against international bribery (IntBestG), the fight against bribery is defined as follows: Bribery is liable to prosecution when

- Officials, judges and soldiers or
- Officials who work for or members of international organisations (e.g. the United Nations or Medics Sans Frontiers) or
- Politicians or Members of Parliament

are bribed, for example to

- Obtain a contract, or
- An authorisation for a new product, a company, a subsidiary etc., or
- In order to achieve any other kind of economic or financial advantage

This law is not only applicable to foreign officials but also to officials within the European Union. Individuals as well as companies can be called to account for bribery or extortion. Depending on the extent of the misconduct, according to German law it is punishable with a fine or prison sentence. The applicable law is not the one of the country where the offence occurred, but in the case of German citizens the German law. Our employees and any other person associated with Global Helicopter Service GmbH must be made aware of this fact. Even a small “baksheesh” is a misconduct and can lead to prosecution. Global Helicopter Service provides its service mainly in Africa and does explicitly not endorse the “baksheesh-tradition”.

Principles to avoid corruption and bribery

1) Transparency

Since corruption takes place in seclusion it is a basic rule that all business processes within the company are handled in a transparent manner. The procedures and daily business is kept transparent for all employees and everyone else involved. It is therefore important to:

- issue reports via IQSMS
- document all transaction and negotiations
- file all relevant documents

2) Increase awareness

Our employees must be made aware of the topic corruption. If everyone actively counteracts corruption the basis for this problem will be erased.

3) Define sectors

It is de facto important to define sectors within the company which are most at risk from corruption and bribery. All departments which are in charge of new acquisitions and new contracts, as well as the departments which have direct contact with suppliers and clients are considered to be especially vulnerable. We are aware of the risks and are able to focus on acting fair, honest and incorruptible.

The following forms of self-control are an aid to avoid corruption in the relevant departments:

- Rota systems between the managers of the departments
- The obligation for every employee to issue reports on IQSMS
- Mutual obligation concerning the signature of documents
- The principle of having more than two eyes on the topic

4) Gifts and meals

Normal and appropriate hospitality, given and received, to or from third parties is not generally prohibited. The giving or receipt of gifts or meals may be admissible, provided that:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage
- it complies with German law
- it is given in the company's name, not in an individual person's name
- no cash or cash equivalents are included
- it is infrequent, reasonable and appropriate in the circumstances (e.g. small Christmas gifts)
- it is given openly, not secretly
- it is not offered to, or accepted from, any governmental institution

5) Exemplary function

It is of great importance that the executive board gives a good example. Thus the management of Global Helicopter Service GmbH has set a good example and has shown its strict rejection of corruption with every new contract won.

6) Constant inspections

To verify that the principles of the ANTI CORRUPTION POLICY are respected the management regularly carries out spot check. This is also part of GHS's Safety Management Manual (SMM).

7) Safety Management

If an employee notices any suspect behaviour, he or she is obliged to contact the SMS Department. Reports can be made anonymous and the SMS is sworn to secrecy but is its duty to follow up every dubious circumstance and search for evidence.

8) No concealment of suspicious cases

Of there should be an accusation for corruption and subsequently proof of corruption of bribery within our company, Global Helicopter Service GmbH is obliged to clarify the case. We do not consent to any concealment of suspicious cases. If a corruption case is confirmed, we will take suitable measures and act according to the regulations established with the contract of employment.