

# Southern Air Systems Ltd

## Anti-Bribery Policy

Policy underlining working standards, and commitment to ethical trading practices  
from Southern Air Systems Ltd Employees, Customers and Suppliers

### 1. Policy Statement

Southern Air Systems Ltd is committed to conducting its business ethically, transparently, and with integrity. We have zero tolerance for bribery, corruption, or any form of unethical conduct. This commitment is central to our values, and we expect the same from all individuals and entities associated with our operations, including employees, directors, agents, suppliers, subcontractors, and consultants.

### 2. Scope of Application

This policy applies to:

- All employees of Southern Air Systems Ltd, including full-time, part-time, temporary, agency, interim, and contract staff
- Company directors
- Any third party working on behalf of or representing Southern Air Systems Ltd, including consultants, agents, and subcontractors

All individuals covered under this policy are expected to read, understand, and comply with its provisions and are required to report any concerns or breaches immediately.

### 3. Definition of Bribery

Bribery refers to the offering, giving, receiving, or soliciting of any item of value as a means to influence the actions of an individual or organisation holding a position of power. Examples include:

- Cash payments or kickbacks
- Gifts, entertainment, meals, or travel
- Donations or sponsorships given in exchange for business advantage
- Preferential treatment or any other benefit that could be construed as a form of inducement

### 4. Legal Framework

This policy aligns with the UK Bribery Act 2010, which outlines the following offences:

- Offering, promising, or giving a bribe
- Requesting, agreeing to receive, or accepting a bribe
- Bribing a foreign public official
- Failing to prevent bribery committed by associated persons

Violations of the Act may result in criminal prosecution of individuals and the company, including fines and imprisonment.

## 5. Prohibited Conduct

You must not:

- Offer, promise, give, or authorise a bribe, either directly or through a third party
- Request, receive, or agree to accept a bribe or improper advantage
- Facilitate, condone, or ignore bribery or unethical conduct by others
- Engage in any conduct that may breach the UK Bribery Act or this policy

Engaging in such conduct will be treated as gross misconduct and may result in disciplinary action, including termination of employment or engagement, as well as potential criminal proceedings.

## 6. Gifts, Hospitality, and Entertainment

Southern Air Systems Ltd recognises that modest gifts and hospitality may be part of customary business practice. However, to ensure transparency and prevent bribery, the following rules apply:

- Gifts and hospitality must be proportionate, reasonable, and not intended to improperly influence decision-making
- All gifts and hospitality whether offered, provided, or received must be logged in the company's Hospitality Register
- Prior approval from a line manager or director is required for any gift or hospitality exceeding £50 (or the locally defined nominal threshold)
- Offering or accepting lavish, frequent, or otherwise inappropriate gifts or hospitality is strictly prohibited

## 7. Responsibilities and Reporting

All employees and representatives of Southern Air Systems Ltd have a duty to:

- Familiarise themselves with this policy
- Avoid actions or decisions that may breach its provisions
- Report concerns, incidents, or suspected violations promptly to their line manager

Reports will be handled confidentially and investigated fairly, without retaliation against the reporting individual.

## 8. Training and Awareness

Southern Air Systems Ltd will provide training to ensure employees and representatives understand their obligations under this policy and the UK Bribery Act. Ongoing awareness initiatives may include refresher courses, internal communications, and case studies to reinforce best practices.



Please complete the following questionnaire to confirm you have read and understand this policy and agree with our terms of service.

To open, please click the below link or scan the QR code.

[https://forms.office.com/Pages/ResponsePage.aspx?id=CDny9ui0uj0uzx\\_fzqq4Cwxq\\_e3YoinVVLqi-eMGcY9gVUN0ZZSjlPM0FDSENPQUNKNzRHVEg5MzU4Ri4u](https://forms.office.com/Pages/ResponsePage.aspx?id=CDny9ui0uj0uzx_fzqq4Cwxq_e3YoinVVLqi-eMGcY9gVUN0ZZSjlPM0FDSENPQUNKNzRHVEg5MzU4Ri4u)