Anti-Bribery and Corruption Statement

A J Walter Aviation Limited ("AJW") operates globally, and we pride ourselves on our reputation of acting fairly and ethically in all business transactions with customers, suppliers and strategic partners.

AJW condemns corruption in all its forms, and we will not tolerate behaviour in violation of anticorruption laws. We have implemented robust policies, procedures and controls to prevent such activities. This includes mandatory face-to-face and online training for all employees and representatives, thorough due diligence on all business partners, suppliers and customers to ensure they share our commitment to ethical business practices and a policy highlighting our zero tolerance to bribery and corruption. Moreover, compliance with anti-bribery laws are added as mandatory requirements in our agreements with suppliers, customers, employees and representatives.

We have in place a confidential reporting channel for employees and stakeholders to report concerns and suspicions of bribery and we regularly review and monitor our policies and procedures to ensure their effectiveness and compliance with evolving legal and regulatory requirements.

UK anti-corruption laws apply to AJW's employees and representatives whether conducting business in the UK or internationally. Compliance with this statement is a shared responsibility of every individual representing the business, both in the UK and overseas.

AJW is dedicated to fostering a culture of integrity, honesty, and accountability across all levels of our organisation. We believe that by upholding the highest ethical standards, we can build trust with our customers, partners, and stakeholders while contributing to a fair and competitive business environment globally.

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Clyde Buntrock, CEO

Date 20/3/2024