

ASES Gift & Hospitality Policy

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1 Introduction

As set out in the ASES Aviation Services & Support Inc (ASES) Anti-Bribery and Anti-Corruption Policy it is prohibited for anyone acting on behalf of ASES to offer or accept bribes (the act of offering or accepting illegal direct or indirect gifts or payments to influence the judgment or conduct of a person in a position of trust).

In this context, Section 3 of this Policy sets out the basic “Gift and Hospitality” policy rules.

This ASES Gift and Hospitality Policy (“Policy”) should be read in combination with the Anti-Bribery and Anti-Corruption Policy and sets out the rules and guidelines for Gifts and Hospitality in more detail.

These principles apply to all staff of ASES and to our agents, consultants, distributors, suppliers or others acting on behalf of ASES or with whom we do business, including operations conducted by subsidiaries or (joint-venture) partners.

Every director, officer and employee of ASES, and any third party acting on behalf of ASES, shall familiarize themselves with, understand and fully comply with this Policy. This Policy may be communicated to relevant third parties. Those who manage or supervise others have an additional responsibility – they must lead by example and ensure that their staff have received the necessary information and resources to respect this Policy. This responsibility includes monitoring staff compliance with the Anti Bribery and Anti-Corruption Policy and this Policy, and supporting employees who raise questions or concerns in an honest and sincere way.



2 Definitions

For the purposes of this Policy:

- **Gifts** include any payment, cash, favour, reimbursement, loan, or present, consisting of money or not, preferential treatment or anything else of value which is promised, given or received in connection with a potential or existing business relationship.

- **Hospitality** includes any form of social amenity, meal, service, entertainment and travel facilities or anything else of value which is given or received in connection with a potential or existing business relationship.

- **Advantages** includes Gift and Hospitality, as defined above.



3 Rules for offering or accepting Gifts & Hospitality

3.1 Gifts

You may only give or accept reasonable and proportional Gifts for legitimate business reasons under the following conditions:

- The Gift is reasonable in terms of its cost, quantity and frequency, and appropriate for the seniority of the recipient and the underlying business purpose;
- The Gift is strictly offered or accepted by the business counterparty himself/herself and not extended to the benefit of their family, (non-accompanying) partner and/or friends.
- The Gift is offered or accepted in an open and transparent manner and, if publicly disclosed, would not embarrass ASES or damage its reputation;
- It is agreed that the offer or acceptance of a Gift shall in no way affect a decision subsequently made by the recipient. When considering Gifts for a potential customer or from a potential supplier, extra care should be taken. You must not offer/accept Gifts (other than nominal items) to/from a customer when important business decisions are being made (for example you are negotiating a contract or during a tender process);
- The exchange of Gifts is authorized by the laws and regulations of applicable local laws and Turkey (check with ASES Management (see Section 7), if necessary);



Gifts are sent to the professional address of the recipient or, if you are the recipient, to your professional address;

- You should be able to answer any inquiries about Gifts;
- The expenditure related to the Gift is duly accounted for in the books and records of ASES in a traceable manner;
- The receipt of the Gift is reported to and discussed with your hierarchical manager. Gifts exceeding a value of EUR 50 per person per event requires prior approval as described in section 4.
In the event that prior approval for a Gift exceeding the value EUR 50 proves impossible, approval may be requested without undue delay after acceptance. Should such approval be denied then the authorized approver (see Section 4) decides on the appropriate action (e.g. return the Gift, store the Gift at a central location at a professional address or destroy the Gift).
- Offering a Gift is discussed with and approved by your hierarchical manager. Gifts exceeding a value of EUR 50 per person per event requires prior approval as described in Section 4.

The principles of this Policy do not apply on advantages offered or received related to organized, sponsored or attended marketing events, if such advantages are planned, budgeted and/or approved in advance by an ASES Management Team member and comply with applicable laws. Nevertheless, the costs related to the marketing event should be reasonable and proportional and have a legitimate business reason to avoid the risk of bribery.

Contact your Manager (see Section 7) if you are unsure about offering or accepting a Gift. Note that you remain personally responsible for offering or accepting any Gifts.



3.2 Hospitality

For Hospitality, the same rules apply as for Gifts as mentioned under Section 3.1 above. For Hospitality, prior approval is required for amounts of EUR 100 per person per event (see Section 4).

If you offer Hospitality, you must always attend the event personally. If you are offered Hospitality, the person offering this Hospitality should be present during the event.

3.3 Customer travel

Since ASES operate in the aerospace/airline industry, upgrades and free or reduced-price tickets may be offered.

Offering or accepting upgrades, or free or reduced-price tickets in a business context is only allowed (i) for/from existing business contacts for legitimate business reasons, (ii) if it has no impact on decision making, and (iii) if it is reasonable and proportionate.

- For offering or accepting upgrades, prior approval is required by the hierarchical manager. If prior approval cannot be obtained in time, upgrades must be reported to the hierarchical manager as soon as possible.
- Approval for offering free or reduced-price tickets to third parties must be obtained in line with internal procedures or, if such internal procedures are not in place, according to the prior approval process in section 4.
- For employees on duty (and other members of staff) travel rules apply; accepting free or reduced-price tickets requires prior approval by the hierarchical manager.

Private use of upgrades, or free or reduced-price tickets received from business contacts, is not allowed.



3.4 Political charitable donations and political contributions

No political charitable donations or political contributions, including sponsorship, on behalf of ASES are allowed.

3.5 Public Officials and Government Employees

Offering Advantages to public officials or government employees is often highly regulated by complex local laws that are strictly enforced by authorities; you must be particularly vigilant in this area. This includes knowledge of the local rules and ensuring prior approval. Also, you must not offer Advantages to third parties, such as the family members of public officials, if such Advantages are intended to influence an official in an indirect and corrupt way.

3.6 Solicitation and extortion

This category of payments relates to any action intended to influence decision-making or get something by force. Solicitation is a request for money, information or help. Extortion is a practice of obtaining something, especially money, through force or threats. You are not allowed to actively solicit or extort payments from others. In the event that a third party solicits a payment or attempts to extort money, you should inform your manager (see Section 7).



4 Prior approval process

In certain cases, this Policy defines amounts above which prior approval must be obtained.

The ASES Management Team member or a member of the Board of Directors will approve/deny the request.

The individual responsible for granting or denying approval will maintain a record of the decisions made.

5 Control, audit and investigation

Management is responsible for complying with this Policy. Internal Auditors can perform audits on the implementation and compliance with the rules of this Policy. If there is cause to believe a failure to observe this policy, Internal Auditors, Security Services or other internal or external experts are empowered to launch an investigation.

6 Policy non-compliance

6.1 Disciplinary sanctions

Any violation of this Policy may lead to criminal, civil and/or disciplinary sanctions, including as the case may be termination of employment by ASES against the will of the employee, in accordance with the applicable laws and rules of the relevant company.

6.2 Speak up process and Whistleblowing procedures

ASES allows staff to report, situations or behaviours that they consider contrary to this Policy, as well as a number of other compliance concerns.



7 Contacts

If you have any questions regarding the subject of this Policy, please do not hesitate to contact your direct Manager or a member of the Board of Directors.



Annex Overview of Gift & Hospitality categories

Subject to (i) the criteria included under section 3 and (ii) using good judgment and acting responsibly, in practical situations, the following guidelines apply

Category	Examples	Offering – active	Accepting – passive
Gifts	Presents, company goodies, etc.	Maximum of EUR 50 per person per event	Maximum of EUR 50 per person per event
Hospitality	Treating business contacts to meals, entertainment, etc.	Maximum of EUR 100 per person per event	Maximum of EUR 100 per person per event
Customer travel	Upgrades, free or reduced-price tickets	Only for existing business contacts for legitimate business reasons, like training, etc.	Only from existing business contacts for legitimate business reasons, like training, etc.
Political charitable donations and political contributions, including sponsorship	Payments to governmental charities, politicians or government officials. Political sponsorships.	Not allowed	Not applicable
Solicitation and extortion	Any action intended to influence decision making or obtain something by force	Not allowed	Inform your manager

