

# Airswift Policy Statement on Anti-Bribery and Anti-Corruption



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At Airswift, we act with passion daily, to accomplish the targets we set for ourselves. We conduct our business with the commitment to maintain the highest standards of management. We act with integrity and honesty. We are ethical in all our business operations and engagements.

This Airswift Anti-Bribery and Anti-Corruption Policy Statement covers all our business interactions and association involving Airswift and read together with our Code of Business Ethics (CoBE) and Anti-Bribery and Corruption Procedure (ABC). It defines the principles for ethical conduct we are committed to. We have zero tolerance for bribery and corrupt activities.

## We make the following commitments:

1. Airswift is committed to complying with all applicable laws, regulations and standards or, where internal policies require a higher standard, will apply and comply with the higher standard.
2. Our Top Level Management are dedicated to implementing strong policies and procedures to prevent bribery and corruption, while continuously improving the Anti-Bribery Management System (ABMS). Business Ethic Officer (BEO) oversees the implementation of our compliance and ethics programmes and ABMS, and has direct access to the CEO and Governance Board for effective management and grievance handling.
3. We have zero tolerance for any form of corrupt business practices, whether committed directly or indirectly.
4. We also have zero tolerance for our employees and others whether acting for themselves or on behalf of others, who solicit, offer, or accept bribes in relation to our business and operations. As part of our employment contracts, all employees are required to adhere to our CoBE and other policies and procedures on bribery and corruption. Violation of the CoBE will result in disciplinary measures being taken.
5. We will implement risk-proportionate measures to prevent bribery and corruption by any director, employee, contractor or third party representing or providing services for or on behalf of Airswift.
6. We have various channels for grievance-raising and encourage our employees to report any improper conduct to us guided by the Airswift Whistleblowing Policy.

A handwritten signature in black ink, reading 'Janette Marx'. The signature is fluid and cursive, with a large, sweeping 'J' and 'M'.

**Janette Marx**

Chief Executive Officer



[airswift.com](https://airswift.com)

Airswift Holdings Ltd.  
ABMS Policy Statement  
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