

ANTI-BRIBERY POLICY

CHC is committed to conducting its business with the utmost integrity and by the principles set out in the UK Bribery Act 2010.

CHC expects its employees and business partners to respect and support our core values of trust, honesty, and integrity.

CHC does not tolerate the offering, giving, requesting, receiving, or acceptance of bribes in any form.

A bribe is a financial payment or other form of reward that is intended to induce or influence an individual, company, or public body to perform their functions improperly. This may include showing partiality, acting in bad faith, or acting in a way that is inconsistent with a position of trust.

Bribes, for this Policy, include facilitation payments, kickbacks, and any other reward, favor or payment designed to induce or influence the recipient to perform his or her functions improperly.

In the case of a foreign public official, it is not permitted to offer a payment or other reward to a foreign public official that may influence that official to give an advantage to our business, whether intended to induce improper performance.

Hospitality designed to improve business relations which is proportionate to the circumstances, and which is not for an improper purpose is not usually regarded as a bribe.

No employee, agent, consultant or business intermediary acting for CHC may offer, give, request, receive or accept any bribes, whether directly or indirectly.

What does this mean for me?

- Any alleged or suspected incident of bribery will be subject to a formal investigation and may lead to disciplinary action against any employee involved. Unlawful conduct or any behaviour that breaches this Code will be treated as gross misconduct and may result in dismissal. Employees may be suspended during the course of the investigation, and the matter may be reported to the police where appropriate.
- Employees who engage or do business with third parties who act on behalf of CHC or represent CHC should ensure that this Code is drawn to their attention. CHC expects such third parties to comply with this Code and with the applicable law relating to bribery.
- CHC reserves the right to terminate immediately any contract or business relationship with any agent, consultant, or other business intermediary where bribery has occurred.

Procedures to Mitigate Risk

- Training for employees and those working for CHC or representing CHC in a business capacity.
- Written commitments from those we work with to engage with the principles in this Code.
- CHC will work with its business partners to develop and improve good practices and to seek to eliminate bribery and corruption. It will select business partners who have adopted similar policies and objectives and will avoid doing business with those who act unlawfully or in a way that is not consistent with ethical business principles.

Monitoring and Compliance

- The Company Directors will review procedures and will monitor their effectiveness.
- Designated individuals within each business area, together with the Managing Director/Directors have responsibility for the implementation and development of such procedures.
- All employees must comply with this Code and support and promote its principles in their business function.
- Any employee having a question or concern about this Code, the administration of CHC policies and procedures designed to prevent bribery, or any issue where guidance is sought on a particular set of circumstances may raise it with their line manager or Company Director.
- Any employee who suspects that bribery has occurred or that there has been any other breach of this Code should report it so that it can be formally investigated.

Signed 

Date: 22/07/2025

Name: Howard Chamberlain – Managing Director

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