

ANTI-BRIBERY AND CORRUPTION POLICY

The core values of honesty, integrity and transparency are central to **Airland Logistics'** relationships with its employees, representatives and joint venture partners.

To ensure that **Airland's** core values are reflected in all of its business dealings, **Airland** is committed to upholding both the letter and spirit of the laws, regulations and international standards that apply to its operations.

Airland is an international company with executive offices in Copenhagen, Denmark; Perth, Australia; Johannesburg, Cape Town and Durban, South Africa; Dubai, United Arab Emirates; Toronto, Canada; Ulaanbaatar, Mongolia; and operations throughout Africa, Asia and other areas in the world.

The United States, Denmark, Australia and South Africa have all implemented the OECD Convention on combating Bribery of Foreign Public Officials in International Business Transactions ["OECD Convention"]. The United States have long established and upheld the OECD principles in their Foreign Corrupt Practices Act of 1977 ["FCPA"].

In 2000, Denmark implemented the OECD Convention by amending the Danish Criminal Code. In 1999 Australia implemented the OECD Convention in the Commonwealth Criminal Code (the "Australian Criminal Code") and in 2004 South Africa established the Prevention and Combating of Corrupt Activities Act ["PACCA"].

This legislation forms a key part of the legislative framework within which **Airland** operates. Additionally, it is possible that in some limited circumstances, **Airland's** operations may arguably be subject to the Bribery Act (U.K.). **Airland** will endeavour to ensure that its employees, representatives and joint venture partners comply with these laws.

Ethics and behaviour are individual responsibilities, and high standards of behaviour are expected of all **Airland** employees and representatives, including joint venture partners, regardless of their position in, or relationship with **Airland**.

Airland has prepared this Guide to ensure that all employees and representatives, including joint venture partners, are able to understand and adhere to the provisions of the FCPA, the Danish Criminal Code, the Australian Criminal Code, PACCA and laws of the United Arab Emirates relating to bribery of foreign public officials ["the Anti-Bribery Laws"].

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Airland employees and representatives, including joint venture partners, are expected to adhere to all of the laws and regulations that govern **Airland's** conduct. Violation of the law by any **Airland** employee or representative, including a joint venture partner, will not be tolerated. A violation of the law, or unethical behaviour which may affect **Airland's** reputation, will be subject to immediate disciplinary action, which, in the case of employees, may include the termination of employment.

Airland reserves the right to terminate any association or business relationship with any **Airland** representative, including a joint venture partner that violates the law.

This Guide only represents a part of **Airland's** compliance program. **Airland** employees and representatives, including joint venture partners, are expected to be familiar with, and adhere to, **Airland's** compliance programme in its entirety, including **Airland's** Code of Business Conduct and this Guide.



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Airland Logistics
May 2013