



Compliance statement: 017revA

Glenair Worldwide Ethical Business Practices Policy and Training Module

This Ethical Business Practices Policy is intended to comply with the United States FAR/DFARS requirements, United Kingdom Bribery Act of 2010, and similar regional, national or international laws.

The first Glenair Guiding Principle well states our position on ethical business practices:

Protect the reputation of the organization: It is your primary responsibility to behave in a manner which reflects well on Glenair. Our “zero tolerance” employee conduct policy prohibits all forms of unethical behaviour in the workplace.

To flesh out this Principle, here are some more specific directives:

1. Bribery prohibition— offering, promising or giving a bribe, as well as requesting, agreeing to or receiving a bribe to obtain or award favourable treatment in connection with a contract is prohibited.
2. Public official bribery prohibition—bribing a public official to obtain or retain business is Prohibited.
3. Kickback prohibition—providing or attempting to provide a kickback is prohibited, as is soliciting, accepting or attempting to accept a gratuity. “Kickback” means any money, fee, commission, credit, gift, gratuity, thing of value, or compensation of any kind which is provided to or received by, directly or indirectly, any customer or supplier to obtain or award favourable treatment in connection with a contract.
4. Gratuity prohibition—providing or attempting to provide a gratuity is prohibited, as is soliciting, accepting or attempting to accept a gratuity. “Gratuity” means any substantial entertainment or gift provided to or received by, directly or indirectly, any customer or supplier to obtain or award favourable treatment in connection with a contract. Reasonable and proportionate entertainment (such as a meal at a restaurant) and gifts (such as modest Glenair logo items) are not prohibited.
5. Use of Federally appropriated funds prohibition—no Federally (USA) appropriated funds can be used to influence an officer or employee of a governmental agency or a Member of the US Congress in connection with award of contract.
6. Facilitation payments prohibition—payment to officials (and others) simply to secure or expedite performance of normal duties (for example, granting a license or allowing goods to cross a border) is prohibited, even if the official demands such payment to act.
7. Other unethical business practices or behaviours are also prohibited.

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Violation of the Ethical Business Policy

Consistent with the *Glenair Guiding Principles*, Glenair takes a zero tolerance approach regarding violations of this Policy. Violation of this Policy will result in disciplinary action up to and including termination of employment, if employed by Glenair, Inc., Glenair UK Ltd. or any of their subsidiaries.

For Glenair Sales Representatives, violation of the Ethical Business Policy may result in termination of the sales representation contract. For Glenair Independent Contractors, violation of the Ethical Business Policy may result in termination of the contract. Failing to report known or suspected violations of the Ethical Business Policy is also a violation of the Policy and subject to same disciplinary action detailed above.

Persons who wish to report known or suspected violations of the Ethical Business Policy should notify the President, a Vice President, a Managing Director, or a Country Manager. The recipient of this notification will immediately notify the President to determine what action is warranted. All reports of violations will be investigated and appropriate action will be taken based on the results of the investigation. We will attempt to keep confidential who has reported the violation. If anonymity is desired, the report can take the form of writing with no signatory.

Date	Change History
Current January 2016	C001