



WFS FACILITATION PAYMENTS POLICY



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1. PURPOSE

WFS's Code of Conduct and Anti-corruption policy require us to comply with international anti-corruption and anti-bribery laws including, but not limited to, the U.S. Foreign Corrupt Practices Act 'FCPA', the French anti-corruption law also known as 'Sapin 2' law, the UK Bribery Act of 2010 'UKBA', and any other applicable anti-bribery laws in countries in which WFS does business.

In line with our Code of Conduct, WFS strictly prohibits its employees from giving or offering bribes, whether to public officials or private parties, or permitting a third party to do so on WFS's behalf, in order to obtain, retain or secure any improper business advantage. WFS employees are also prohibited from receiving a corrupt payment of money, or anything of value, in connection with their employment with our company. The purpose of this Policy is to make clear that in keeping with these principles, "Facilitation Payments" as defined below, are strictly prohibited.

2. SCOPE

This Policy applies to all WFS legal entities (subsidiaries, branches, representative offices, joint-ventures, partnerships, etc.) and any other entities in which WFS is a shareholder. In instances where WFS owns a minority of the entity shares or does not exercise effective control, WFS will use its best efforts to persuade such entity(ies) to adopt this or a materially similar Policy.

3. FACILITATION PAYMENTS

"Facilitation Payments" also known as "Expediting" or "Grease payments", are financial payments made to a public or government official, political party or party official with the purpose of expediting or securing the performance of a routine governmental action or function (e.g. customs clearance, obtention of an operation license or permit, access to restricted areas, etc.).

In general, a facilitation payment is requested by low-level, low-income officials, as an "incentive" for speeding up an administrative process or providing a service to which the payer is legally entitled without making such payment.

4. RESPONSIBILITY AND ENFORCEMENT

Although Facilitation Payments may be permitted under certain anti-corruption laws, they are nonetheless a form of bribery that is illegal under other anti-corruption laws such as the 'UKBA' or 'Sapin 2', and in most of the countries where they are paid. In accordance with WFS's Code of Conduct and Anti-corruption Policy, all Facilitation Payments are prohibited.

This Policy must be complied with by all employees working at all levels and grades for WFS, including Executives, senior managers, directors and employees (whether permanent, fixed-term or temporary) wherever located. Any Employee violating this Policy will be subject to disciplinary sanctions in accordance with the local rules in effect within WFS.

WFS also requires that any third party working for the company, without being an employee of WFS (consultants, subcontractors, suppliers, partners, service providers, or any other third party acting on behalf of WFS), complies with this Policy.

5. REFERENCES

If you have any questions concerning this Policy, please contact:

- the WFS Compliance Officer at fmascorro@wfs.aero, or
- the Group General Counsel at cdthomas@wfs.aero.

