

# Anti-Bribery Policy

Policy: TAP-SA-002 Issued: 2016-05-19



## INTRODUCTION

Tempo is committed to fair and open business conduct throughout the world. Underlying this commitment is the conviction that businesses should compete on the basis of price, quality and service, and in full compliance with applicable law. Tempo Aerospace Inc, its employees and agents and the contractors it engages shall work in accordance with the laws of the markets in which they conducts business.

One of the applicable laws is the Corruption of Foreign Public Officials Act (the CFPOA). CFPOA focuses on anti-bribery provisions that prohibit the promise, payment or giving of money or anything of value to any foreign official for the purpose of obtaining or retaining business or gaining an improper advantage.

CFPOA applies to a wide variety of situations, including payments to foreign government officials, payments to foreign airline officers, relationships with foreign representatives and consultants, charitable and political contributions, maintenance of books and records, procurement payment procedures, and industrial participation transactions. Violations of the CFPOA may subject Tempo and Tempo employees to criminal or civil liability or both, including imprisonment and substantial penalties and fines.

## REQUIREMENT

Violations also subject Tempo to administrative sanctions such as suspension or debarment from government contracting and ineligibility for export licenses. As a result, each agent and those they employ have the responsibility to fulfill the Tempo commitment to comply with the CFPOA, including the duty to seek interpretation or assistance when in doubt.