

# Facilitation Payments Policy

\* \* \*

*ITP Aero is part of the Rolls-Royce group of companies and is subject to the same standards of behaviour as the rest of Rolls-Royce. ITP Aero has adopted this Policy based on the equivalent Rolls-Royce Group Policy. This Policy is mandatory and applies to all employees and workers of ITP Aero, including the parent company and all its subsidiaries. This Policy sets the minimum standard that must be followed. Where local laws, regulations or rules impose a higher standard, that higher standard must be followed.*

\* \* \*

**© Copyright - Industria de Turbo Propulsores S.A. (2018)**

The information in this document is the property of Industria de Turbo Propulsores S.A. under copyright and with copyright permission to all the companies of ITP Aero group.

## Introduction

In most of the countries where ITP Aero does business, Facilitation Payments are considered a form of bribery and are illegal. As part of its zero-tolerance approach to bribery and corruption as set out in section 2.5 of the ITP Aero Code of Conduct, ITP Aero prohibits the making of Facilitation Payments whether or not they are permitted by local or other laws. Paying Facilitation Payments could cause serious harm to ITP Aero and Rolls-Royce.

ITP Aero is part of the Rolls-Royce group of companies and so is subject to equivalent standards of behaviour to the rest of Rolls-Royce. ITP Aero has adopted this Facilitation Payments Policy (“Policy”) based on the Rolls-Royce Global Facilitation Payments Policy. It contains the same fundamental requirements, but is appropriately amended to reflect the fact that ITP Aero remains a corporate entity and does not have access to all of the Rolls-Royce policies, processes and systems, which rely upon a network connection. In spite of this, ITP Aero employees are expected to adhere to these equivalent standards.

This Policy is mandatory and applies to all employees of ITP Aero and its subsidiaries (“ITP Aero” or “Company” or “employees”). It also applies to third parties, such as Advisers (promoters, agents, consultants and brokers) representing ITP Aero. This Policy sets the minimum standard that must be followed. Where local laws, regulations or rules impose a higher standard, that higher standard must be followed. Breaches of the ITP Aero ABC policies, including this Policy, are not acceptable and may result in disciplinary action up to and including dismissal.

### This Policy:

- Provides a framework for our approach to Facilitation Payments
- Sets out our Facilitation Payment standard

#### Your responsibility

To read, understand and comply with this policy;

Raise any questions or concerns you might have. There is advice on how you can do so in Section 2.

#### Your manager’s responsibility

To understand this policy and make sure that they do not ask you to work in a way that contravenes it.

## Common terms

### Facilitation Payment

Payment made to facilitate or expedite decisions or actions by government agencies or government officials. This definition of Facilitation Payment does not include the payment of fees to expedite, fast track or speed up a service in accordance with an official and published price list.

### Company

This means any company within the *ITP Aero* group, including the parent company (*Industria de Turbo Propulsores S.A.U.*) and its wholly owned subsidiaries or any other company in which they have a controlling and/or majority shareholding.

### ITP Aero

This means as applicable either the whole ITP Aero group or any Company thereof as defined above

# 1 Facilitation Payments Policy

## 1.1. Policy

---

**With respect to Facilitation Payments, you must not:**

1.1.1. Make Facilitation Payments (no matter how small the payments are); or

1.1.2. Allow others (including promoters, advisers, agents, consultants, distributors and logistics providers) to make Facilitation Payments on behalf of ITP Aero.

## 1.2. All employees

---

**With respect to requests for Facilitation Payments, you must:**

1.2.1. Decline to make the payment and report the request to you own Line Manager and the Ethics & Compliance Manager or a Head of Ethics; and

1.2.2. Report as soon as possible if you know or suspect a breach of this Policy by you or by another person, including those acting on behalf of ITP Aero who are not ITP Aero employees (for example, promoters or logistics providers). Reports should be made to the Ethics & Compliance Manager, or a Head of Ethics or the I ITP Aero Ethics Line.

## 1.3. All employees

---

**If your health, safety or freedom (or that of your family, colleagues or people you are travelling with) could be at risk if you do not make a Facilitation Payment, you must:**

1.3.1. Never put yourself or your family members in dangers

1.3.2. If time permits, and doing so does not put yourself or your family in danger, obtain help and guidance from your Line Manager, the Ethics & Compliance Manager or a Head of Ethics; and

1.3.3. If guidance is not available, or if advised to, make the payment and promptly report the payment and the circumstances to the Ethics & Compliance Manager or a Head of Ethics.

## 1.4. All employees

---

**If you have made a Facilitation Payment, the Company:**

1.4.1. Will not take disciplinary action against you if you genuinely believed that your health, safety or freedom or that of your family, colleagues or people you are travelling with would have been in danger if you had not done so.

## 2 Where to find out more

If you have any questions or need further information, you can contact:

- Name: Belén González Villajos  
Role: ITP Aero Ethics & Compliance Manager  
Address: Industria de Turbo Propulsores S.A., Francisca Delgado, 9, 28108, Alcobendas, Madrid  
Telephone: +34 912 054 635  
Mobile: +34 627 165 965  
Email: [belen.gonzalez@itpaero.com](mailto:belen.gonzalez@itpaero.com)
- Name: Manuel P. González San Segundo  
Role: ITP Aero Executive Director of Organization & Resources  
Address: Industria de Turbo Propulsores S.A., Francisca Delgado, 9, 28108, Alcobendas, Madrid  
Telephone: +34 912 060 144  
Mobile: +34 607 428 158  
Email: [manuel.gonzalez@itpaero.com](mailto:manuel.gonzalez@itpaero.com)
- The ITP Aero Ethics Line  
Available at the intranet [ecm.itpaero.com](http://ecm.itpaero.com) and the website [www.itpaero.com](http://www.itpaero.com)

## 3 Other documents you should read

- The *ITP Aero* Code of Conduct
- The ABC Policies and guidance documents on the *ITP Aero* intranet Ethics & Compliance site