

Conflict of Interest Statement – Coordination

All coordination activities are performed on the basis that outcomes are fair, impartial and non-discriminatory. All members of the coordination team are trained and routinely monitored to ensure compliance with these core principles.

Transparency

ACL Asia Pacific (ACL) will exceed the industry standard level of transparency allowing all interested stakeholders the ability to assess coordination decisions and hold ACL to account for the decisions made. ACL will always make itself available to explain its coordination decisions and provide an explanation as how a decision was made based on the applicable slot Regulation and industry best practice.

Internal Review

Slot decisions related to any party that could be or perceived to be a conflict of interest will be reviewed as follows. This includes but not limited to decision related to members of ACL or its subsidiaries.

Decision	First Review	Second Review
Slot decision with no impact on the historic precedent of a slot	Coordination Manager	N/A
Slot decision with an impact on the historic precedent of a slot	Coordination Manager	Head of Coordination
Allocation of a New Slot	Coordination Manager	Head of Coordination
Retime of a slot at Initial Coordination	Coordination Manager	N/A
Alleviation decision impacting all or more than one airline	Coordination Manager	N/A
Alleviation Decision impacting the potential conflicted party only	Coordination Manager	Head of Coordination
Any decision that could be a conflict of interest.	Coordination Manager	Head of Coordination

Decision Monitoring and Publication

ACL will log all decisions required under this policy including a brief description of the circumstances and the reason for the decision. In the matter of the allocation of a new slot or a retime into a peak period, ACL will in addition publish the justification for such action on its website.

Compliance

As part continuous training program, ACL will ensure that all members of the team will be trained on what may constitute or be perceived to be a conflict of interest. This will include the following areas:

1. Avoid personal or financial interests
2. Recognising and preventing preferential treatment
3. Maintaining confidentiality
4. How to disclose potential conflicts
5. Upholding ethical standards

After the training, each member of staff will be asked to commit to meet the standards required to comply with this policy.

Bribery

ACL has a comprehensive policy based on the Bribery Act. Each year all members of ACL are required to complete mandatory training.

Coordination Team

All employees have a duty to the Company to be entirely free from the influence of any conflicting interests when they represent the Company in any business dealing or make any recommendation which may influence an action of the Company.

Unless prior permission is received from the Chief Executive Officer an employee shall not, directly or indirectly:

- a) Accept any payment, gift, benefit, entertainment, or other favour of more than nominal value from any person or entity doing or seeking to do business with the Company
- b) Accept or ask for airline tickets for personal use if the objectivity and independence of their decision making might be influenced or if it could be perceived that their decision making might be influenced
- c) Benefit personally from any purchase or sale of goods or services by the Company, except through commissions or other benefits provided by the Company in the ordinary course of business
- d) Enter into a transaction with the Company for their own account or divert a business opportunity from the Company for their own benefit
- e) Extend credit on behalf of the Company to a customer where the proceeds are used to repay a debt owing to him or her or a member of his or her immediate family
- f) Have any ownership interest in any entity doing business with the Company or competing with the Company, except through widely held equity aggregating less than 1 % of the outstanding equity of such entity
- g) Serve as an officer, director, employee, or consultant for any entity or person which is a competitor of the Company, or which does or is seeking to do business with the Company
- h) Utilise any Confidential Information concerning, or obtained from the Company to obtain any unfair or improper personal advantage

A breach of the above could lead to disciplinary action.

Whistle Blowing

Should any member of the ACL team believe that a colleague is acting in a way that contravenes this policy is encouraged to use the whistle blowing policy as detailed in the ACL staff handbook. This includes an independent external helpline should the matter relate to allegations against their manager or more senior member of staff.