

Community Involvement and Charitable Giving Framework

BBA Aviation's Approach to Corporate Social Responsibility in the Community is to "identify opportunities to benefit local communities where we operate through community involvement and charitable giving".

1. Benefit local communities

BBA Aviation and its subsidiaries give priority to donation requests that benefit local communities where BBA Aviation companies operate. Requests from employees or others to donate company time, money or other benefits to international or national or other charities or organisations that do not have such a focus will be declined, other than in exceptional humanitarian relief situations or as part of matching employee fundraising or similar employee activities.

BBA Aviation and its subsidiaries will consider donating company time, money or other benefits to registered charities or appropriate public sector or not for profit organisations, but will not donate to private individuals, to unregistered organisations, to associations which are not registered charities or to political or religious organisations.

2. Requests for an employing company to donate company cash or other benefits

Any request from an employee for their employing company to donate company cash or other benefits should be forwarded to their designated local company representative, together with an explanation of how any donation would benefit the local community.

Where suppliers, customers, advisers, subsidiaries or other associates of BBA Aviation request donations from BBA Aviation or its subsidiaries as a company (as distinct from requesting donations from employees in a personal / individual capacity) such request should be forwarded to their designated local company representative.

Each business will set up an application and decision-making process for such requests from employees and others.

3. Company matching employee fundraising

Where 10% or more of the employees in a facility are participating in a fundraising event in their own time, the company may make a donation up to matching the funds the employees have raised from other sources, subject to locally set limits. The company may support a group of employees participating in an event fundraising for any registered charity, not necessarily one that is local to the facility. This matching of fundraising only applies to fundraising that employees participate in, not fundraising by employees' families or friends.

Each business will set up an application and decision-making process for such requests from employees.

4. Employee volunteered time in company time

BBA Aviation and its subsidiaries recognise their responsibility to their local communities and support the engagement of employees with the communities of which they are a part. Employees may be permitted to volunteer company time during the working day. Each business will set up a process for reviewing and responding to such requests. Any permission given will be subject to review in the light of business requirements at the time. This is not intended to affect what employees do in their own time.

5. Safety and insurance

It is important that when participating in community and charitable activities neither employees nor members of the general public are exposed to inappropriate risk. To ensure the safety of our employees and third parties and to ensure adequate insurance protection, all companies must adopt a risk-based approach to assessing potential involvement in such activities, have suitable safety policies to protect employees and third parties who might be affected by such activities and disclose to Group Risk Management those activities that might be regarded as 'hazardous' to employees or third parties. This disclosure must be sufficiently in advance of the event to allow the arrangement of suitable insurance to protect the Company.

Each business will set up a process within their application and decision making process for reviewing, risk assessing and, as necessary, reporting such events, under the responsibility of their designated local company representative.

6. Parent company donations

BBA Aviation plc's Charitable Giving Committee, made up of representatives from across the businesses and chaired by the Group Secretary, will meet at least twice a year (by phone) to review applications from employees or employing companies for parent company donations. Successful applications are likely to be in respect of organisations which have current local connections (through donations made in the previous 12 months under paragraphs 2, 3 or 4 above) and organisations which are connected with aviation, engineering or education.

7. Requests that will be declined

A donation request will always be declined if it could appear that accepting such a request:

- might be linked to a competitive procurement or bidding process
- might tarnish BBA Aviation's reputation
- might put the company, its employees or the general public at risk
- might be intended to influence the business judgement of any party
- might put an employee in a position where they have a conflict of interests or could otherwise be perceived to be in breach of BBA Aviation's Code of Business Ethics or related policies

February 2010