

## **ANTI-CORRUPTION POLICY**

\_\_\_\_\_ (the “Company”) has adopted this Anti-Corruption Policy (the “Policy”) to enforce its commitment to complying with the anti-bribery laws in all countries in which it operates. Officers, employees or representatives of the Company may not, directly or indirectly, break or seek to evade the laws or regulations of any country in which it does business. Furthermore, the Company may not, directly or indirectly, offer or provide a bribe and all demands for bribes must be expressly rejected. Bribery includes any offer, promise, or gift of any pecuniary or other advantage, whether directly or through intermediaries, to a public official, political party, political candidate or party official or any private sector employee, in order that the official or employee act or refrain from acting in relation to the performance of their duties, in order to obtain or retain business or other business advantage. In addition, officers, employees or representatives of the Company may not “kick-back” any portion of a contract payment to employees of other parties to a contract or use other vehicles such as subcontracts, purchase orders or consulting agreements to channel payments to government officials, political candidates, employees of other parties to a contract, their relatives or business associates. A “kick-back” is a particular form of bribe which takes place when a person entrusted by an employer or public function has some responsibility for the granting of a benefit and does so in a way that secures a return (kick-back) of some of the value of that transaction or benefit for that person without the knowledge or authorization of the employer or public body to which the person is accountable.

Officers, employees and representatives of the Company who become aware of any illegal or questionable activity or find themselves subjected to any form of extortion or who are asked to participate in any way in bribery or kickback schemes shall promptly report these occurrences to senior management, without fear that their employment will be adversely

affected. Furthermore, the Company will provide training to its employees on this Policy, as well as, anti-bribery and anti-corruption laws.

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Company Name

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Signature

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Name

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Title

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Date