



## Global Anti-Bribery and Corruption Policy

*Vadatech Inc. is committed to conducting its business ethically and in compliance with all applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act (UKBA) and similar laws in other countries that prohibit improper payments to obtain a business advantage. This document describes Vadatech's Policy prohibiting bribery and other improper payments in the conduct of Vadatech's business operations and employee responsibilities for ensuring implementation of the Policy.*

### **Purpose**

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that Vadatech's business is conducted in a socially responsible manner.

### **Policy**

Vadatech strictly prohibits bribery or other improper payments in any of its business operations. This prohibition applies to all business activities, anywhere in the world, whether involving government officials or other commercial enterprises. A bribe or other improper payment to secure a business advantage is never acceptable and can expose individuals and Vadatech to possible criminal prosecution, reputational harm or other serious consequences.

This Policy applies to everyone at Vadatech, including all officers, employees and agents or other intermediaries acting on Vadatech's behalf. Each officer and employee of Vadatech has a personal responsibility and obligation to conduct Vadatech's business activities ethically and in compliance with all applicable laws based on the countries wherein Vadatech does business. The company has zero tolerance for any corruption in business activity. Employees are expected to adhere to both the spirit and the letter of this policy concerning all aspects of Vadatech's business anywhere in the world. Improper payments prohibited by this policy include bribes, kickbacks, excessive gifts or entertainment, or any other payment made or offered to obtain an undue business advantage. These payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly related to the conduct of Vadatech's business. Violation of this policy may result in disciplinary action up to and including summarily termination.

The VP of Operations will be the compliance officer and has overall responsibility for the program, supported by the executive leadership of Vadatech.

The compliance officer is responsible for giving advice on the interpretation and application of this policy, supporting training and education, and responding to reported concerns. The prohibition on bribery and other improper payments applies to all business activities, but is particularly important when dealing with government officials. The U.S. Foreign Corrupt Practices Act and similar laws in other countries strictly prohibit improper payments to gain a business advantage and impose severe penalties for violations.