



ANTI-BRIBERY AND CORRUPTION POLICY

1. PRINCIPLES

PCI Labs, (the Company) is committed to ensure that our business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. It is vital for us to maintain this reputation as it generates confidence in our business and trust with our business partners.

Bribery and corruption exposes the Company, its employees and business partners to the risk of criminal prosecution, in addition to harming the Company's reputation. Therefore it is vital that we ensure that our employees and those who work on our behalf understand their responsibilities and operate to high ethical standards. This is why we have a zero tolerance approach towards bribery and corruption. We have adopted this policy and communicate this message to assist those working with us uphold it.

2. POLICY

PCI Labs opposes all forms of bribery and corruption, irrelevant of whether it is large or small; initiated by corrupt officials, companies or individuals; or it takes place in the public or private sector.

We prohibit the offering of a bribe in any form, including kickbacks, facilitation payments or the use of other routes or channels to provide improper benefits to customers, agents, contractors, suppliers or employees of any such party or government officials. This includes payments to family members of public or company officials.

PCI Labs may be liable if any person 'associated' with the company bribes another person intending to obtain or retain business or a business advantage for the Company. Failing to prevent bribery by those working on our behalf, even indirectly (such as through subsidiaries, agents, contractors, suppliers and intermediaries) can lead to prosecution. For the purposes of this policy, the term "Agent" is defined as representatives, consultants, brokers, contractors or any other intermediary that provides services on behalf of PCI Labs.

We expressly prohibit any employee or person associated with the Company from accepting a bribe, facilitation payment or kickback from customers, agents, contractors, suppliers or employees of any such party for their own benefit or that of their family, friends, associates or acquaintances. This includes payments from family members of public officials.

What is Bribery?

Bribery is the offer, promise, giving, demanding or acceptance of an advantage in monetary or any other form, as an inducement or reward for the improper performance of a function or activity, which is expected to be performed in good faith, or impartially by someone in a position of trust. Bribery is a criminal act.

Anti-Bribery and Corruption (ABC) Program

Senior management with executive responsibility is committed to PCI Labs ABC Program that contains measures designed to prevent and detect bribery and corruption. The Program contains the following elements:

1. A policy, which articulates the Company's commitment to prevent violations of anti-corruption laws in all jurisdictions in which we operate;
2. The assessment of risk of bribery and corruption within the Company and the development of effective, efficient and transparent controls to reduce exposure to those risks;
3. Communication of the ABC policy and all relevant elements of the ABC Program to all employees throughout the Company and to our business partners and supply chain;
4. The adoption of standard ABC wording in contracts and renewals with all agents and business partners;



5. The adoption of appropriate and proportionate due diligence on business partners, subcontractors and suppliers coupled with a requirement that they implement adequate procedures for the prevention of bribery and corrupt practices and pass this obligation onto their own supply chains;
6. Training of all relevant individuals throughout the Company so that compliance with our policies and procedures is the duty of all relevant employees at all levels and so that individuals can recognize bribery and corruption and take steps to avoid the same;
7. The use of financial and accounting procedures, including a system of internal controls, designed to ensure no one individual is able to unduly influence a business decision of the Company and to ensure the maintenance of fair and accurate books, records and accounts which cannot be used to hide bribery or corruption;
8. Annual audits and reviews of the Company's ABC risk assessments, policies, and procedures to monitor, evaluate and improve their effectiveness.

Responsibilities

Senior Management is responsible for the oversight of the ABC Program and to monitor compliance.

Local Management is responsible for ensuring that the ABC Program is implemented into their business and is communicated to all employees and service providers.

Employees must remain vigilant and report any suspicion of bribery, corruption or improper business