



M10TEK: Anti-Bribery & Corruption Policy

Introduction

M10TEK, LLC values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the organization's staff as well as others acting on the organization's behalf are key to maintaining these standards.

The purpose of this document is to set out the organization's policy in relation to bribery and corruption. The policy applies strictly to all employees, partners, agents, consultants, contractors and to any other people or bodies associated with M10TEK within all offices, areas and functions.

Understanding and recognizing bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest under the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing that person to act or to reward them for having acted in a way which a reasonable person would consider improper under the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

Purpose and Objective

This overview of M10TEK's Policy outlines the principles that M10TEK follows to achieve zero-tolerance against bribery and corruption. The objective of our anti-corruption policy is to ensure that appropriate anti-corruption and bribery procedures are in place across the globe to avoid any violations of relevant laws and regulations, including, among others, the U.S. Foreign Corrupt Practices Act.

Scope

This policy applies to all officers, employees, contractors and appointed third party representatives of M10TEK (including but not limited to agents, intermediaries and consultants)

in all locations. Violation of this policy will be severely sanctioned, including where appropriate disciplinary procedures, up to and including termination of employment or contracts and possible referral to the appropriate criminal or regulatory authorities.

M10TEK intends to review doing business with others who do not commit to the same standard of zero-tolerance of corruption, including joint ventures partners and third-party providers.

Policy

M10TEK, LLC will not tolerate bribery or corruption in any form.

- **No acceptance or offering of bribes and facilitating payments** - Strictly prohibited from giving or receiving bribes (i.e. personal benefit for any improper advantage) as well as facilitating payments (regardless of whether these are common practices in a particular country) which involve anything of value to government officials and/or decision makers in order to expedite or facilitate routine, non-discretionary actions
- **Charitable and political donations** - Prohibited from payment of donations that are linked to obtaining any improper advantage, including facilitating payments.
- **Gifts and Entertainment** - Prohibited from providing gift or entertainment to clients, prospects, government officials or their family members when such expenses are not incurred while conducting company business and/or do not satisfy this policy and our related policies.
- **Payment & Recordkeeping** - All relevant expenditures must be properly documented, approved and maintained for a minimum of 6 years.
- **Due Diligence on Third-Party Representatives** - Required to conduct an appropriate due diligence review on background, reputation, and business capability before engaging or contracting with any third-party representatives and to include anti-corruption provisions in any such contract.
- **Periodic training** - Required to carry out appropriate training to employees and third party's regarding the Anti-Corruption Policy and their role to ensure compliance.

Furthermore: The organization strictly prohibits the offering, giving, solicitation or acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- To or from any person or company wherever located, whether a public official or public body, or a private person or company

- By any individual employee, partner, agent, consultant, contractor or other person or body acting on the organization's behalf
- In order to gain any commercial, contractual or regulatory advantage for the practice in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- Normal hospitality
- Fast tracking a process which is available to all on the payment of a fee; and/or
- Providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to James Rosenberger who is the organization's Compliance Officer for Legal Practice (COLP).

The organization will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees, consultants, contractors or any other representative of M10TEK found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

Key risk areas

Bribery can be a risk in many areas of the organization. Below are the key areas you should be aware of in particular:

- Excessive gifts, entertainment and hospitality can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they are within reasonable limits and are authorized by a partner. Any gift or hospitality, either given or received, over the value of \$100.00 per person should be reported to the COLP.
- Facilitation payments are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The practice will not tolerate or excuse such payments being made.

- Reciprocal agreements or any other form of ‘quid pro quo’ are never acceptable unless they are legitimate business arrangements which are properly documented and approved by a partner. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.
- Actions by third parties for which the practice may be held responsible can include actions by a range of people, e.g. agents, contractors and consultants, acting on the practice’s behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorized and recorded.
- Record keeping can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent. The COLP is responsible for all record keeping.

Personnel responsibility and how to raise a concern

The prevention, detection and reporting of bribery or corruption are the responsibility of all partners and employees of the practice. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this to the COLP without delay.

Acceptance and Acknowledgement:

Signed: _____

Name: _____

Date: _____

Title: _____

Email: _____

EFFECTIVE DATE:

March 3rd, 2023

This document constitutes an Addendum to the Anti-Bribery and Corruption Policy to include the following changes to the *Purpose*.

PURPOSE:

The policy is applicable to M10TEK organizations to include: **M10TEK, LLC** and **M10 Technology Canada, Inc.** All parties will review and comply with the policies and procedures set forth as described. This addendum expands the purpose and scope to be inclusive of U.S. and Canadian entities of the organization.