



Policy on Anti-Corruption

Contact: Al Cordoba

Last Updated: February 28, 2019

Objective

This policy is designed to help Qualex staff comply with the Qualex Anti-Corruption Policy and the anti-corruption laws that govern business around the world.

Policy Text

Ethical Standards

Qualex is committed to ethical business practices and we expect our employees and the employees of our partners to conduct business with high ethical standards and in compliance with the law.

Qualex only does business with trustworthy and ethical partners.

Qualex agrees in its contracts with partners to provide anti-corruption training to our employees. By completing this course, you help satisfy this training requirement.

At Qualex, our partners' success is our success. We value our partners and we win together by doing business ethically and honestly.

Corruption fosters poverty, disease, and crime. Corruption hinders economic and social development, and is bad for business. It distorts competition and hinders partners' ability to fairly participate in customer opportunities

Bribes not allowed

Qualex prohibits corruption of government officials and the payment of bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector.

Qualex must never, under any circumstances, pay or offer to pay a bribe.

Qualex will comply with all applicable laws against bribery, corruption, inaccurate books & records, inadequate internal controls, and money-laundering, including the U.S. Foreign Corrupt Practices Act ("Anti-Corruption Laws").



Compliance with Anti-Corruption Laws

Qualex shall conduct with high ethical standards and comply with all applicable anti-corruption laws. We shall NOT, directly or indirectly, promise, authorize, offer, or pay anything of value to any government official to improperly influence any act or decision for the purpose of promoting the business interests of Qualex.

Facilitating Payments Prohibited

Qualex prohibits bribes of any kind, including facilitating payments.

A facilitating payment is a payment made to secure or expedite a routine government action by a government official.

Due Diligence

Qualex requires that certain partners undergo due diligence procedures, typically called "vetting" before they are permitted to start or renew a business relationship with Qualex.

Partners must comply with Qualex's procedures and requests for information for due diligence or "vetting" of partners.

Money Laundering Prohibited

Qualex shall not use its relationship with a partner to disguise or attempt to disguise the sources of illegally obtained funds.

No Payment of Travel, Gifts, or Hospitality Expenses

Qualex is prohibited from paying expenses for travel, lodging, gifts, or hospitality for government officials.

Accurate Books and Records

Qualex must record payments and other compensation in our corporate books, records, and accounts in a timely manner and in reasonable detail.

No undisclosed or unrecorded accounts may be established for any purpose.

False, misleading, incomplete, inaccurate, or artificial entries in the books and records are prohibited.

Qualex must also develop and maintain a system of internal controls to prevent the payment of bribes and provide reasonable assurance that financial statements and reporting are accurate.



No Personal Funds

Qualex employees should not use personal funds to accomplish what Qualex prohibits or to circumvent Qualex policies and procedures.

No Retaliation

Qualex prohibits retaliation against any employee who has, in good faith, reported a red flag or a possible violation of the law or Qualex's Anti-Corruption Policy.

No employee will suffer adverse consequences for refusing to pay or take a bribe, even if this results in the loss of business to Qualex.

Enforcement

Qualex is subject to criminal and civil penalties from government authorities for violating anticorruption laws.

Qualex may also refer any staff who violates its anti-corruption policy to government authorities for criminal prosecution or other enforcement action, or bring suit for damages.

Reporting Concerns

Employees must report concerns, red flags, and any possible or suspected violation of the law to Qualex Chief Data Officer using the resources described in the Reporting section.

Standards for Subcontractors

Qualex holds our subcontractors and their representatives to the same standard that Qualex applies to its representatives.

Qualex should conduct our own due diligence before hiring subcontractors and representatives to ensure they are legitimate business enterprises, qualified to perform the function for which they are being retained, trustworthy, and ethical.

Global Enforcement

Corruption is a global issue. Every country in which Qualex operates prohibits corruption.

In addition, the U.S. Foreign Corrupt Practices Act (FCPA) extends to Qualex and its partners' activities worldwide.

Anti-corruption laws are enforced globally and across borders.



Avoiding Corruption

Now that you understand the basic requirements of Qualex's Anti-Corruption Policy, let's learn more about how to avoid corrupt or suspicious payments.

What Is a Bribe?

A bribe is offering, promising, authorizing, or giving anything of value to anyone, directly or indirectly, to obtain an improper benefit such as obtaining or retaining business for Qualex or its partners.

Offering, promising, authorizing, or giving

Offering or promising a corrupt payment is prohibited, even if the payment is not made or refused. A bribe does not have to be successful to be illegal.

Even if the official does nothing in return, if you corruptly pay or promise something of value to an official, it is a bribe.

Anything of value

A bribe can take many forms. "Anything of value" includes cash, gifts, travel, hospitality, loans, charitable donations, favors, or job opportunities.

There is no minimum amount for something to be considered a bribe—even small payments can be bribes.

To any type of recipient

Most anti-corruption laws focus on bribes for government officials, although some countries also prohibit private sector bribery.

Qualex prohibits bribes in all forms, regardless of whether the recipient is in the public or private sector.

Directly or indirectly

Even if you don't make the improper payment yourself, you can be liable if you authorize somebody else to do so, or ignore their doing so.

Qualex can be held responsible for the actions of its employees and subcontractors.

To obtain a benefit for Qualex or its partners

Any attempt to improperly influence or affect the decision-making of an individual is prohibited. This includes attempts to influence the award or retention of a contract, reduce duties or fees, guarantee more timely delivery, expedite an approval or permitting process, or affect the outcome of a government decision.

Conducting business ethically and within the law is the right thing to do.



Who Is a Government Official?

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Government officials include:

- Employees of a government entity
- Elected officials
- Private persons acting on behalf of a government entity
- Officers and employees of companies owned or controlled by the government
- Candidates for political office
- Political party officials
- Employees of public international organizations (for example, the World Bank)

It isn't always easy to identify government entities or their employees. Any of these people may be considered government officials:

- A doctor or lawyer employed by a state agency or a state-owned enterprise
- A political party official
- A consultant for a government official
- An employee of a company owned or controlled by the government
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- An employee of a government entity or agency

No Travel, Gifts, or Hospitality

An improper benefit to an official can take many forms. Paying the travel expenses of a government official, or providing gifts or hospitality, can be improper if they are lavish or unrelated to a legitimate business purpose.

Qualex recognizes that small gifts or tokens of esteem or gratitude can be an appropriate way for business people to display respect for each other and might be customary in some business deals. However, lavish, expensive, or extravagant gifts, travel, or hospitality may be viewed as bribes if given with an improper purpose.

Hiring

Qualex should not use employment opportunities to improperly influence the decision making of government officials.

Offering a job to a government official, or employing the official's friends or relatives, may be viewed as offering "something of value" to the official that may constitute a bribe if there is an improper purpose.



Charitable Donations

Many companies, engage in charitable giving to their communities. However, Qualex may not use charitable donations as a way to bribe officials.

If an official makes a promise or threat related to a donation request, the request must be denied and reported.

Companies have been penalized for making donations to charities favored by government officials in order to induce the officials to direct business to the company. Even though the charities were legitimate organizations, the payments from the companies were intended to corruptly influence officials, and therefore violated anti-corruption laws.

What Are Red Flags?

When dealing with customers, suppliers and representatives, watch out for warning signs of an increased risk of improper or corrupt behavior ("red flags").

A red flag is anything that creates a suspicion of improper or corrupt behavior.

Here are some examples of red flags:

- Excessive commissions
- Unreasonably large discounts
- Contracts that do not accurately reflect the actual economics of the deal
- Non-standard terms, or unusually complex terms or billing practices
- Insufficient or non-transparent documentation
- "Consulting agreements" that include only vaguely described services

Report Red Flags

If you see a red flag, you must report it to Qualex. You can report to Qualex through several methods, which are described in the Reporting section.

You will never suffer adverse consequences for taking the action of reporting a red flag in good faith.

Accuracy & Transparency

Anti-Corruption laws require more than not paying bribes. They also require that companies have accurate records, strong internal controls, and do business in a transparent manner.

Accurate Books and Records

Qualex is required both by anti-corruption laws to keep accurate books and records.

Accurate books and records help ensure compliance with anti-corruption laws.



False, misleading, incomplete, inaccurate, or artificial entries in books and records are prohibited.

Requirements for Accuracy and Transparency

Strong Internal Controls. Qualex should develop and maintain a strong system of internal controls to prevent the payment of bribes and provide reasonable assurance that financial statements and reporting are accurate.

Explicit and Transparent Contracts and Pricing. Contract terms, conditions, and pricing should be explicit and transparent, and reflect the actual economics of the deal.

Provide Proof of Execution. Qualex should provide Proof of Execution (PoE) to justify payment of certain funds, for example, channel incentives or Business Development Funds (BDF).

No Undisclosed Accounts. Qualex should not have undisclosed or unrecorded accounts, and only use the bank accounts authorized to make and receive payments.

Avoid Shell Companies and Offshore Accounts. Qualex should avoid the use of shell companies incorporated in other countries, and avoid the use of offshore bank accounts for payments.



Reporting & Resources

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Learning Activity: Consequences of Corruption

What are the consequences for violating anti-corruption laws?

A. You can go to jail.

B. Qualex can be prosecuted by government authorities and barred from conducting business.

C. Qualex, and you personally, can be required to pay large penalties and fines.

D. Customers will not do business with Qualex and your reputation can be harmed.

F. You and Qualex can be subject to civil lawsuits.

G. All of the above

Solution: (G)

EMPLOYEE CERTIFICATION:

I, Alain Dbayan, certify that I have read, understand, and agree to abide by this policy while employed by Qualex. If I have any questions now or in the future, or see any red flags, I will report them to the CDO.

DocuSigned by:

A handwritten signature in black ink, appearing to read "Alain Dbayan", is written over a horizontal line.

63CAEE2D1387437...

Signature

3/19/2019

Date



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Date



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Learning Activity: Consequences of Corruption

What are the consequences for violating anti-corruption laws?

A. You can go to jail.

B. Qualex can be prosecuted by government authorities and barred from conducting business.

C. Qualex, and you personally, can be required to pay large penalties and fines.

D. Customers will not do business with Qualex and your reputation can be harmed.

F. You and Qualex can be subject to civil lawsuits.

G. All of the above

Solution: (G)

EMPLOYEE CERTIFICATION:

I, _____, certify that I have read, understand, and agree to abide by this policy while employed by Qualex. If I have any questions now or in the future, or see any red flags, I will report them to the CDO.

Signature

Date



Policy on Anti-Corruption

Contact: Al Cordoba

Last Updated: February 28, 2019

Objective

This policy is designed to help Qualex staff comply with the Qualex Anti-Corruption Policy and the anti-corruption laws that govern business around the world.

Policy Text

Ethical Standards

Qualex is committed to ethical business practices and we expect our employees and the employees of our partners to conduct business with high ethical standards and in compliance with the law.

Qualex only does business with trustworthy and ethical partners.

Qualex agrees in its contracts with partners to provide anti-corruption training to our employees. By completing this course, you help satisfy this training requirement.

At Qualex, our partners' success is our success. We value our partners and we win together by doing business ethically and honestly.

Corruption fosters poverty, disease, and crime. Corruption hinders economic and social development, and is bad for business. It distorts competition and hinders partners' ability to fairly participate in customer opportunities

Bribes not allowed

Qualex prohibits corruption of government officials and the payment of bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector.

Qualex must never, under any circumstances, pay or offer to pay a bribe.

Qualex will comply with all applicable laws against bribery, corruption, inaccurate books & records, inadequate internal controls, and money-laundering, including the U.S. Foreign Corrupt Practices Act ("Anti-Corruption Laws").



Compliance with Anti-Corruption Laws

Qualex shall conduct with high ethical standards and comply with all applicable anti-corruption laws. We shall NOT, directly or indirectly, promise, authorize, offer, or pay anything of value to any government official to improperly influence any act or decision for the purpose of promoting the business interests of Qualex.

Facilitating Payments Prohibited

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A facilitating payment is a payment made to secure or expedite a routine government action by a government official.

Due Diligence

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Money Laundering Prohibited

Qualex shall not use its relationship with a partner to disguise or attempt to disguise the sources of illegally obtained funds.

No Payment of Travel, Gifts, or Hospitality Expenses

Qualex is prohibited from paying expenses for travel, lodging, gifts, or hospitality for government officials.

Accurate Books and Records

Qualex must record payments and other compensation in our corporate books, records, and accounts in a timely manner and in reasonable detail.

No undisclosed or unrecorded accounts may be established for any purpose.

False, misleading, incomplete, inaccurate, or artificial entries in the books and records are prohibited.

Qualex must also develop and maintain a system of internal controls to prevent the payment of bribes and provide reasonable assurance that financial statements and reporting are accurate.



No Personal Funds

Qualex employees should not use personal funds to accomplish what Qualex prohibits or to circumvent Qualex policies and procedures.

No Retaliation

Qualex prohibits retaliation against any employee who has, in good faith, reported a red flag or a possible violation of the law or Qualex's Anti-Corruption Policy.

No employee will suffer adverse consequences for refusing to pay or take a bribe, even if this results in the loss of business to Qualex.

Enforcement

Qualex is subject to criminal and civil penalties from government authorities for violating anticorruption laws.

Qualex may also refer any staff who violates its anti-corruption policy to government authorities for criminal prosecution or other enforcement action, or bring suit for damages.

Reporting Concerns

Employees must report concerns, red flags, and any possible or suspected violation of the law to Qualex Chief Data Officer using the resources described in the Reporting section.

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Global Enforcement

Corruption is a global issue. Every country in which Qualex operates prohibits corruption.

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Anti-corruption laws are enforced globally and across borders.



Avoiding Corruption

Now that you understand the basic requirements of Qualex's Anti-Corruption Policy, let's learn more about how to avoid corrupt or suspicious payments.

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Offering, promising, authorizing, or giving

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Even if the official does nothing in return, if you corruptly pay or promise something of value to an official, it is a bribe.

Anything of value

A bribe can take many forms. "Anything of value" includes cash, gifts, travel, hospitality, loans, charitable donations, favors, or job opportunities.

There is no minimum amount for something to be considered a bribe—even small payments can be bribes.

To any type of recipient

Most anti-corruption laws focus on bribes for government officials, although some countries also prohibit private sector bribery.

Qualex prohibits bribes in all forms, regardless of whether the recipient is in the public or private sector.

Directly or indirectly

Even if you don't make the improper payment yourself, you can be liable if you authorize somebody else to do so, or ignore their doing so.

Qualex can be held responsible for the actions of its employees and subcontractors.

To obtain a benefit for Qualex or its partners

Any attempt to improperly influence or affect the decision-making of an individual is prohibited. This includes attempts to influence the award or retention of a contract, reduce duties or fees, guarantee more timely delivery, expedite an approval or permitting process, or affect the outcome of a government decision.

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Qualex recognizes that small gifts or tokens of esteem or gratitude can be an appropriate way for business people to display respect for each other and might be customary in some business deals. However, lavish, expensive, or extravagant gifts, travel, or hospitality may be viewed as bribes if given with an improper purpose.

Hiring

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Charitable Donations

Many companies, engage in charitable giving to their communities. However, Qualex may not use charitable donations as a way to bribe officials.

If an official makes a promise or threat related to a donation request, the request must be denied and reported.

Companies have been penalized for making donations to charities favored by government officials in order to induce the officials to direct business to the company. Even though the charities were legitimate organizations, the payments from the companies were intended to corruptly influence officials, and therefore violated anti-corruption laws.

What Are Red Flags?

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Report Red Flags

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Accuracy & Transparency

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DocuSigned by:

Ankit Agrawal

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Signature

3/19/2019

Date



Policy on Anti-Corruption

Contact: Al Cordoba

Last Updated: February 28, 2019

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Signature

Date



Policy on Anti-Corruption

Contact: [Al Cordoba](#)

Last Updated: [February 28, 2019](#)

Objective

This policy is designed to help Qualex staff comply with the Qualex Anti-Corruption Policy and the anti-corruption laws that govern business around the world.

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Strong Internal Controls. Qualex should develop and maintain a strong system of internal controls to prevent the payment of bribes and provide reasonable assurance that financial statements and reporting are accurate.

Explicit and Transparent Contracts and Pricing. Contract terms, conditions, and pricing should be explicit and transparent, and reflect the actual economics of the deal.

Provide Proof of Execution. Qualex should provide Proof of Execution (PoE) to justify payment of certain funds, for example, channel incentives or Business Development Funds (BDF).

No Undisclosed Accounts. Qualex should not have undisclosed or unrecorded accounts, and only use the bank accounts authorized to make and receive payments.

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Learning Activity: Consequences of Corruption

What are the consequences for violating anti-corruption laws?

A. You can go to jail.

B. Qualex can be prosecuted by government authorities and barred from conducting business.

C. Qualex, and you personally, can be required to pay large penalties and fines.

D. Customers will not do business with Qualex and your reputation can be harmed.

F. You and Qualex can be subject to civil lawsuits.

G. All of the above

Solution: (G)

EMPLOYEE CERTIFICATION:

I, _____, certify that I have read, understand, and agree to abide by this policy while employed by Qualex. If I have any questions now or in the future, or see any red flags, I will report them to the CDO.

Signature

Date



Policy on Anti-Corruption

Contact: [Al Cordoba](#)

Last Updated: [February 28, 2019](#)

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This policy is designed to help Qualex staff comply with the Qualex Anti-Corruption Policy and the anti-corruption laws that govern business around the world.

Policy Text

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Qualex only does business with trustworthy and ethical partners.

Qualex agrees in its contracts with partners to provide anti-corruption training to our employees. By completing this course, you help satisfy this training requirement.

At Qualex, our partners' success is our success. We value our partners and we win together by doing business ethically and honestly.

Corruption fosters poverty, disease, and crime. Corruption hinders economic and social development, and is bad for business. It distorts competition and hinders partners' ability to fairly participate in customer opportunities

Bribes not allowed

Qualex prohibits corruption of government officials and the payment of bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector.

Qualex must never, under any circumstances, pay or offer to pay a bribe.

Qualex will comply with all applicable laws against bribery, corruption, inaccurate books & records, inadequate internal controls, and money-laundering, including the U.S. Foreign Corrupt Practices Act ("Anti-Corruption Laws").



Compliance with Anti-Corruption Laws

Qualex shall conduct with high ethical standards and comply with all applicable anti-corruption laws. We shall NOT, directly or indirectly, promise, authorize, offer, or pay anything of value to any government official to improperly influence any act or decision for the purpose of promoting the business interests of Qualex.

Facilitating Payments Prohibited

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Due Diligence

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Money Laundering Prohibited

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No Payment of Travel, Gifts, or Hospitality Expenses

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No Personal Funds

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No Retaliation

Qualex prohibits retaliation against any employee who has, in good faith, reported a red flag or a possible violation of the law or Qualex's Anti-Corruption Policy.

No employee will suffer adverse consequences for refusing to pay or take a bribe, even if this results in the loss of business to Qualex.

Enforcement

Qualex is subject to criminal and civil penalties from government authorities for violating anticorruption laws.

Qualex may also refer any staff who violates its anti-corruption policy to government authorities for criminal prosecution or other enforcement action, or bring suit for damages.

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Employees must report concerns, red flags, and any possible or suspected violation of the law to Qualex Chief Data Officer using the resources described in the Reporting section.

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Anti-corruption laws are enforced globally and across borders.



Avoiding Corruption

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Offering, promising, authorizing, or giving

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Even if the official does nothing in return, if you corruptly pay or promise something of value to an official, it is a bribe.

Anything of value

A bribe can take many forms. "Anything of value" includes cash, gifts, travel, hospitality, loans, charitable donations, favors, or job opportunities.

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To any type of recipient

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Directly or indirectly

Even if you don't make the improper payment yourself, you can be liable if you authorize somebody else to do so, or ignore their doing so.

Qualex can be held responsible for the actions of its employees and subcontractors.

To obtain a benefit for Qualex or its partners

Any attempt to improperly influence or affect the decision-making of an individual is prohibited. This includes attempts to influence the award or retention of a contract, reduce duties or fees, guarantee more timely delivery, expedite an approval or permitting process, or affect the outcome of a government decision.

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Companies have been penalized for making donations to charities favored by government officials in order to induce the officials to direct business to the company. Even though the charities were legitimate organizations, the payments from the companies were intended to corruptly influence officials, and therefore violated anti-corruption laws.

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Policy on Anti-Corruption

Contact: [Al Cordoba](#)

Last Updated: [February 28, 2019](#)

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EMPLOYEE CERTIFICATION:

I, Daniel, certify that I have read, understand, and agree to abide by this policy while employed by Qualex. If I have any questions now or in the future, or see any red flags, I will report them to the CDO.

DocuSigned by:

Daniel A. Corbett, Jr.

CB591A88B41E490...

Signature

3/18/2019

Date



Policy on Anti-Corruption

Contact: [Al Cordoba](#)

Last Updated: [February 28, 2019](#)

Objective

This policy is designed to help Qualex staff comply with the Qualex Anti-Corruption Policy and the anti-corruption laws that govern business around the world.

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Learning Activity: Consequences of Corruption

What are the consequences for violating anti-corruption laws?

A. You can go to jail.

B. Qualex can be prosecuted by government authorities and barred from conducting business.

C. Qualex, and you personally, can be required to pay large penalties and fines.

D. Customers will not do business with Qualex and your reputation can be harmed.

F. You and Qualex can be subject to civil lawsuits.

G. All of the above

Solution: (G)

EMPLOYEE CERTIFICATION:

I, Dean Hatch, certify that I have read, understand, and agree to abide by this policy while employed by Qualex. If I have any questions now or in the future, or see any red flags, I will report them to the CDO.

DocuSigned by:

Dean Hatch

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3/19/2019

Signature

Date



Policy on Anti-Corruption

Contact: [Al Cordoba](#)

Last Updated: [February 28, 2019](#)

Objective

This policy is designed to help Qualex staff comply with the Qualex Anti-Corruption Policy and the anti-corruption laws that govern business around the world.

Policy Text

Ethical Standards

Qualex is committed to ethical business practices and we expect our employees and the employees of our partners to conduct business with high ethical standards and in compliance with the law.

Qualex only does business with trustworthy and ethical partners.

Qualex agrees in its contracts with partners to provide anti-corruption training to our employees. By completing this course, you help satisfy this training requirement.

At Qualex, our partners' success is our success. We value our partners and we win together by doing business ethically and honestly.

Corruption fosters poverty, disease, and crime. Corruption hinders economic and social development, and is bad for business. It distorts competition and hinders partners' ability to fairly participate in customer opportunities

Bribes not allowed

Qualex prohibits corruption of government officials and the payment of bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector.

Qualex must never, under any circumstances, pay or offer to pay a bribe.

Qualex will comply with all applicable laws against bribery, corruption, inaccurate books & records, inadequate internal controls, and money-laundering, including the U.S. Foreign Corrupt Practices Act ("Anti-Corruption Laws").



Compliance with Anti-Corruption Laws

Qualex shall conduct with high ethical standards and comply with all applicable anti-corruption laws. We shall NOT, directly or indirectly, promise, authorize, offer, or pay anything of value to any government official to improperly influence any act or decision for the purpose of promoting the business interests of Qualex.

Facilitating Payments Prohibited

Qualex prohibits bribes of any kind, including facilitating payments.

A facilitating payment is a payment made to secure or expedite a routine government action by a government official.

Due Diligence

Qualex requires that certain partners undergo due diligence procedures, typically called "vetting" before they are permitted to start or renew a business relationship with Qualex.

Partners must comply with Qualex's procedures and requests for information for due diligence or "vetting" of partners.

Money Laundering Prohibited

Qualex shall not use its relationship with a partner to disguise or attempt to disguise the sources of illegally obtained funds.

No Payment of Travel, Gifts, or Hospitality Expenses

Qualex is prohibited from paying expenses for travel, lodging, gifts, or hospitality for government officials.

Accurate Books and Records

Qualex must record payments and other compensation in our corporate books, records, and accounts in a timely manner and in reasonable detail.

No undisclosed or unrecorded accounts may be established for any purpose.

False, misleading, incomplete, inaccurate, or artificial entries in the books and records are prohibited.

Qualex must also develop and maintain a system of internal controls to prevent the payment of bribes and provide reasonable assurance that financial statements and reporting are accurate.



No Personal Funds

Qualex employees should not use personal funds to accomplish what Qualex prohibits or to circumvent Qualex policies and procedures.

No Retaliation

Qualex prohibits retaliation against any employee who has, in good faith, reported a red flag or a possible violation of the law or Qualex's Anti-Corruption Policy.

No employee will suffer adverse consequences for refusing to pay or take a bribe, even if this results in the loss of business to Qualex.

Enforcement

Qualex is subject to criminal and civil penalties from government authorities for violating anticorruption laws.

Qualex may also refer any staff who violates its anti-corruption policy to government authorities for criminal prosecution or other enforcement action, or bring suit for damages.

Reporting Concerns

Employees must report concerns, red flags, and any possible or suspected violation of the law to Qualex Chief Data Officer using the resources described in the Reporting section.

Standards for Subcontractors

Qualex holds our subcontractors and their representatives to the same standard that Qualex applies to its representatives.

Qualex should conduct our own due diligence before hiring subcontractors and representatives to ensure they are legitimate business enterprises, qualified to perform the function for which they are being retained, trustworthy, and ethical.

Global Enforcement

Corruption is a global issue. Every country in which Qualex operates prohibits corruption.

In addition, the U.S. Foreign Corrupt Practices Act (FCPA) extends to Qualex and its partners' activities worldwide.

Anti-corruption laws are enforced globally and across borders.



Avoiding Corruption

Now that you understand the basic requirements of Qualex's Anti-Corruption Policy, let's learn more about how to avoid corrupt or suspicious payments.

What Is a Bribe?

A bribe is offering, promising, authorizing, or giving anything of value to anyone, directly or indirectly, to obtain an improper benefit such as obtaining or retaining business for Qualex or its partners.

Offering, promising, authorizing, or giving

Offering or promising a corrupt payment is prohibited, even if the payment is not made or refused. A bribe does not have to be successful to be illegal.

Even if the official does nothing in return, if you corruptly pay or promise something of value to an official, it is a bribe.

Anything of value

A bribe can take many forms. "Anything of value" includes cash, gifts, travel, hospitality, loans, charitable donations, favors, or job opportunities.

There is no minimum amount for something to be considered a bribe—even small payments can be bribes.

To any type of recipient

Most anti-corruption laws focus on bribes for government officials, although some countries also prohibit private sector bribery.

Qualex prohibits bribes in all forms, regardless of whether the recipient is in the public or private sector.

Directly or indirectly

Even if you don't make the improper payment yourself, you can be liable if you authorize somebody else to do so, or ignore their doing so.

Qualex can be held responsible for the actions of its employees and subcontractors.

To obtain a benefit for Qualex or its partners

Any attempt to improperly influence or affect the decision-making of an individual is prohibited. This includes attempts to influence the award or retention of a contract, reduce duties or fees, guarantee more timely delivery, expedite an approval or permitting process, or affect the outcome of a government decision.

Conducting business ethically and within the law is the right thing to do.



Who Is a Government Official?

Qualex prohibits corrupt payments to "government officials."

Government officials include:

- Employees of a government entity
- Elected officials
- Private persons acting on behalf of a government entity
- Officers and employees of companies owned or controlled by the government
- Candidates for political office
- Political party officials
- Employees of public international organizations (for example, the World Bank)

It isn't always easy to identify government entities or their employees. Any of these people may be considered government officials:

- A doctor or lawyer employed by a state agency or a state-owned enterprise
- A political party official
- A consultant for a government official
- An employee of a company owned or controlled by the government
- A teacher employed by a city or town
- An employee of a government entity or agency

No Travel, Gifts, or Hospitality

An improper benefit to an official can take many forms. Paying the travel expenses of a government official, or providing gifts or hospitality, can be improper if they are lavish or unrelated to a legitimate business purpose.

Qualex recognizes that small gifts or tokens of esteem or gratitude can be an appropriate way for business people to display respect for each other and might be customary in some business deals. However, lavish, expensive, or extravagant gifts, travel, or hospitality may be viewed as bribes if given with an improper purpose.

Hiring

Qualex should not use employment opportunities to improperly influence the decision making of government officials.

Offering a job to a government official, or employing the official's friends or relatives, may be viewed as offering "something of value" to the official that may constitute a bribe if there is an improper purpose.



Charitable Donations

Many companies, engage in charitable giving to their communities. However, Qualex may not use charitable donations as a way to bribe officials.

If an official makes a promise or threat related to a donation request, the request must be denied and reported.

Companies have been penalized for making donations to charities favored by government officials in order to induce the officials to direct business to the company. Even though the charities were legitimate organizations, the payments from the companies were intended to corruptly influence officials, and therefore violated anti-corruption laws.

What Are Red Flags?

When dealing with customers, suppliers and representatives, watch out for warning signs of an increased risk of improper or corrupt behavior ("red flags").

A red flag is anything that creates a suspicion of improper or corrupt behavior.

Here are some examples of red flags:

- Excessive commissions
- Unreasonably large discounts
- Contracts that do not accurately reflect the actual economics of the deal
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DocuSigned by:

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