

**Anti-Corruption Policy**



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| **Version** | 1 |
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| **Last updated** | 11/15/2021 |
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| **Owner** | Lin Cherry |
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| **Collaborators** |  |
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| **Audience** | Wizeline Employees |
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| **Parent Policy** |  |
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**Purpose**

The purpose of this Anti-Corruption Policy (this, “Policy”) is to set out the policy of Wizeline, Inc. (together with its subsidiaries, the “Company” or “Wizeline”) in relation to bribery and corruption to ensure compliance by the Wizeline with all applicable anti-corruption laws.

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**Overview**

Wizeline is committed to conducting its business in compliance with all applicable laws, including laws in relation to the prohibition of improper payments or gifts of any kind to any person, including Government Offcials (as defned below), customers or suppliers.

**Scope**

Wizeline is subject to various anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, Article 222 of the Mexican Federal Criminal Code, and other laws that apply in the various jurisdictions where we operate. All agents (including independent contractors and consultants) and employees (including offcers) and directors of Wizeline are expected to comply with this Policy.

**Principles**

None of our employees may pay bribes or act corruptly, and Wizeline will not ask a third party to do so on our behalf. We require that all of our employees and agents adhere to the following principles.

**No Facilitation Payments**

Wizeline does not permit payments to Government Offcials to facilitate administrative processes, unless such payments are legal and approved in writing by the General Counsel.

A Government Offcial includes anyone who is:

* An offcer or employee of any local, provincial or national government, including government agencies;
* An offcer or employee of any government-owned or controlled business or company;

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* An offcer or employee of a public international organization (such as the World Bank and United Nations);
* A person acting in an offcial capacity or on behalf of any government or public international organization;
* Any offcer or employee of a political party;
* Any candidate for political offce; and
* A close relative of any of the above.

**No Bribes**

No Wizeline employee or agent may:

* offer, promise, or provide anything of value – including a bribe – to secure business or any advantage in connection with Wizeline’s business;
* request or accept any bribes or other improper benefts.

**Gifts and Entertainment**

Wizeline’s employees and agents must follow the requirements of our [Gift and](https://docs.google.com/document/d/1Zy-WbXx3_RBgBUN8xKCrGdW5nuJy00PXubvqRTkx3JU/edit) [Entertainment Policy](https://docs.google.com/document/d/1Zy-WbXx3_RBgBUN8xKCrGdW5nuJy00PXubvqRTkx3JU/edit) in giving or receiving gifts or entertainment.

**Accurate Books & Records**

Accurate and detailed timesheets, travel and expense reports, fnancial statements, customer billing, and other records must be submitted in connection with any business of Wizeline no matter how small. Wizeline’s books and records must accurately refect the company’s business transactions.

**No Improper Conduct by Third Parties**

This Policy applies to the third parties that act on Wizelne’s behalf and their actions cannot violate applicable laws or our policies. Wizeline employees must take ownership in the relationship of the company with third parties.

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**No Improper Charitable Contributions**

Charitable contributions can present risks if such contributions are used to improperly infuence a decision-maker in connection with Wizeline business. Prior to any charitable contribution by Wizeline, pre-approval by the General Counsel is required.

**Training**

Wizeline will provide regular anti-corruption training to employees working in certain relevant functions such as managers and other employees in Sales, Marketing, Finance, and Legal. It is the obligation of all employees of Wizeline to complete any training assigned to them relating to this Policy.

**Violations of this Policy**

Employees of Wizeline may face disciplinary actions in the event of a violation of this Policy, including termination of the employment relationship.

If you become aware of a violation of this Policy, you must report it. Retaliation against anyone who submits a good faith report of a violation or possible violation of this or any other policy will not be tolerated.

To report a possible violation of this Policy via our hotline at [wizeline.ethicspoint.com](https://secure.ethicspoint.com/domain/media/en/gui/82302/index.html).

Revision History

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| --- | --- | --- | --- |
| **Version** | **Release Date** | **Originator** | **Changes** |
|  |  |  |  |
| **1** |  | Lin Cherry | Initial Release of the Policy |
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