



Anti-Bribery / Anti-Corruption Policy

This Anti-Bribery / Anti-Corruption Policy (the “Policy”) applies to the Eviosys family of companies (“Eviosys” or the “Company”) worldwide, to all Eviosys employees (whether permanent or temporary), and to all representatives acting on behalf of Eviosys (including Business Partners). Note that terms capitalized in this Policy are listed in Appendix I.

It is the policy of Eviosys to conduct its worldwide operations ethically and in compliance with all applicable laws. This Policy is aimed at ensuring that result. In particular, the Policy covers compliance with all anti-bribery and anti-corruption laws applicable to Eviosys, including the Sapin II Law, the UK Bribery Act, and the U.S. Foreign Corrupt Practices Act (the “FCPA”). Eviosys also expects Business Partners to comply with all applicable anti-bribery and anti-corruption laws.

All Eviosys employees and representatives are expected to comply with this Policy and applicable anti-bribery and anti-corruption laws. Failure to do so may lead to disciplinary action, up to and including termination.

The Company and individuals alike can also be subject to substantial financial penalties and imprisonment for violations of anti-bribery and anti-corruption laws.

The Compliance Officer and his / her delegates are responsible for administering and maintaining this Policy. If you have any question about this Policy, you should contact the Compliance Officer.

PROHIBITED CONDUCT

Eviosys employees and representatives (including Business Partners) are prohibited from offering, promising, making, or authorizing a Bribe or Payment of any item of value, either directly or indirectly, to (i) any Public Official when the Bribe or Payment is intended to obtain or retain business or any other business advantage, or (ii) to any other person (including non-public persons) when the Bribe or Payment is intended to:

- induce an act in violation of a lawful duty,
- cause a person to refrain from acting in violation of a lawful duty,
- secure any improper advantage or improper performance of a function connected with a business, and/or
- improperly influence the decision of a government or government instrumentality.

In addition, Eviosys employees and representatives must not solicit, demand, request, or accept a Bribe or any other Payment from a Business Partner or any other person where the purpose of the Bribe or Payment is to improperly influence Eviosys or to obtain any business advantage from Eviosys or from the recipient individually.



It is important to know that a Payment or other item of value does not have to be money. For example, it can be a gift or providing entertainment or hospitality.

RECORDKEEPING

To promote compliance with applicable anti-bribery and anti-corruption laws, Eviosys maintains internal records and accounts based upon sound accounting principles. All Payments made in accordance with this Policy must be timely and accurately recorded. All entries must include reasonable detail so that accounting records fairly reflect the transactions. Eviosys will not tolerate false, misleading, or inaccurate entries in its books and records. Anyone who falsifies accounting records will be subject to disciplinary action, up to and including termination.

COMPLIANCE RESPONSIBILITIES

- **Hospitality / Business Courtesies.** Gifts, entertainment, sponsored travel, and other types of hospitality (any of which is a Business Courtesy) must never be offered to or accepted from any person under circumstances that might create the appearance of impropriety. Before providing or accepting any Business Courtesy, you must determine what authorization is required and what other steps must be taken to ensure compliance with this Policy and applicable laws.

If you have any questions regarding what is appropriate, including whether authorization may be required in order to provide a Business Courtesy to a Public Official, you should consult with your manager or with the Compliance Officer.

- **Other Payments.**

Facilitating Payments. A facilitating payment is a Payment, whether in a large or small amount, made to a Public Official to expedite a routine governmental action. Eviosys specifically ***prohibits*** such payments.

Political, Charitable or Other Contributions. You may not make any political, charitable, or other contribution to any person, or offer, promise, or authorize such a Payment, on behalf of Eviosys, without specific, prior approval in writing from the Chief Financial Officer.

- **Due Diligence.** Eviosys will only enter into business relationships with reputable, qualified individuals and firms. Before engaging any Business Partner, Eviosys will conduct the appropriate level of due diligence to evaluate potential compliance risks related to the prospective partner. Detailed instructions for conducting and recording due diligence on



Business Partners are available from the Compliance Officer and are set out in Eviosys's separate procedure on this: "Compliance Procedure: Due Diligence on Business Partners".

- **Training.** Employees involved in international business will be required to attend anti-bribery and anti-corruption training on a regular basis. As necessary, new employees will be required to review this Policy and certify that they understand and will comply with it and applicable law.
- **Compliance Personnel.** The Compliance Officer or her/his designee is responsible for managing and administering this Policy and all other aspects of Eviosys's anti-bribery / anti-corruption compliance efforts. This includes ensuring that appropriate training is provided to employees, overseeing due diligence on Business Partners, approving Business Courtesies as needed, and other such steps.
- **Compliance Reviews.** As needed, the Company will conduct compliance reviews to determine how effective this Policy is, and to identify any areas where compliance can be bolstered. All Eviosys employees are expected to cooperate fully in any such reviews. In addition, whenever necessary, Company management will receive a report on compliance with this Policy and with the anti-corruption laws applicable to the Company.

REPORTING VIOLATIONS.

- As further detailed in the Eviosys Code of Business Conduct and Ethics, any employee or representative who becomes aware of any existing or potential violation of this Policy is strongly encouraged to report the concern to the Compliance Officer or the Legal Department, or to your supervisor. If you believe that you need to keep your concern confidential, you may also report your concern using the Ethics Reporting Hotline, as follows:
- **Website:** <https://www.lighthouse-services.com/eviosys> [[lighthouse-services.com](https://www.lighthouse-services.com)]
- **Anonymous Reporting App: Keyword: Eviosys**
 - Detailed instructions [here](https://www.lighthouse-services.com) [[lighthouse-services.com](https://www.lighthouse-services.com)]
- **Toll-Free Telephone:**
 - **800-603-2869** (must dial country access code first [click here](https://www.lighthouse-services.com) [[lighthouse-services.com](https://www.lighthouse-services.com)] for access codes and dialing instructions)
- **E-mail:** reports@lighthouse-services.com (must include company name with report)
- **Fax:** +1 (215) 689-3885 (must include company name 'Eviosys' with report)



Reported complaints and concerns will be communicated and investigated, as appropriate, in accordance with the Eviosys compliance program. No one should report any existing or potential violation to any person who is involved in the matter giving rise to the existing or potential violation.

Every person who receives a complaint or a report alleging or regarding an actual or potential violation of this Policy should encourage the person reporting it to communicate with the Compliance Officer or another member of the Legal Department. The person receiving the complaint or report may also communicate with the Compliance Officer or Legal Department if needed.

- **Anonymous Reporting**

When using the Ethics Reporting Hotline, the complainant may remain anonymous. However, we encourage anyone making a report to identify themselves to facilitate follow-up and investigation as, in some cases, anonymity may hinder a full investigation of the issue. The complaint should provide a sufficiently detailed description of the factual basis of the allegation so that an appropriate review can be performed.

- **Anti-Retaliation**

Employees who in good faith raise issues relating to misconduct can rest assured their concerns will be taken seriously and will be promptly and fully investigated in an appropriate manner. All reports will be treated confidentially to the extent reasonably possible, subject to applicable law. Employees are expected to cooperate fully with any investigation.

Employees raising concerns in good faith are protected from retaliation under applicable law and Eviosys policy. Eviosys will not tolerate any retaliation for reporting existing or potential violations of this Policy or assisting in an investigation of a report. Any person who participates in retaliatory conduct will be subject to disciplinary action up to and including, where appropriate, termination of employment. Misusing this Policy by knowingly or recklessly providing false information to Eviosys may also result in appropriate disciplinary action.



ANTI-CORRUPTION POLICY

APPENDIX I – KEY CONCEPTS AND DEFINITIONS

Bribe: A payment, offer or promise to pay or give, or authorization of a Payment to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly.

Business Courtesy: Any gift or other hospitality, such as sponsored travel or entertainment, regardless of value.

Business Partner: Any joint venture partner, affiliate, distributor/dealer, agent, consultant, or any other third party engaged to act on behalf of Eviosys in commercial matters. Business Partners do not include vendors providing commodities of a modest value or routine office services.

Facilitating Payment: A Payment to a Public Official to expedite, secure performance of, or otherwise facilitate a non-discretionary, routine governmental action (i) that the Public Official ordinarily performs, and (ii) to which Eviosys is legally entitled. ***Eviosys strictly prohibits Facilitating Payments.***

Payment: The direct or indirect giving of, offer to give, authorization to give, or promise to give a thing of value, whether in the form of cash, a gift, cash equivalents (e.g., gift cards), Business Courtesies, commercial paper (e.g., checks, promissory notes, etc.), in-kind transfers, loans, commissions, rebates, or other compensation, employment opportunities, donations, charitable contributions, or anything else that could be considered a thing of value to the recipient.

Public Official: Any of the following:

A. Any officer, agent, or employee, regardless of rank or title, of

- (i) any government, or any government department, agency, or instrumentality, including any state-owned or -controlled company or other enterprise, or any individual holding legislative, administrative or judicial positions;
- (ii) any public international organization, such as the United Nations or the World Bank; or
- (iii) any political party.

B. Any candidate for political office,

C. Any political party,

D. Members of royal families, or

E. Any person acting on behalf of a Public Official.



Red Flag: Any fact or circumstance that increases the likelihood of a violation of this Policy or any anti-bribery or anti-corruption law.