



# Anti-Bribery Policy

It is the policy of Solution Industries, to conduct all business in an ethical and honest manner. Solution Industries has a zero-tolerance for bribery and corrupt activities, and is committed to the implementation and enforcement of this policy; to ensure bribery is prevented. This policy applies to all employees, whether full-time, part-time, or temporary.

The definition of bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting any item of value to influence the action or decision of another person in order to gain commercial contractual, regulatory or personal advantage.

It is acceptable business practice to either send or receive gifts or gestures of hospitality and goodwill of an appropriate nature, so long as the giving or receiving of gifts meets the following requirements:

- A. It is not made with the intention of influencing the party to whom it is being given
- B. It is not made with the suggestion that a return favor is expected.
- C. It is in compliance with local law.
- D. It is given in the name of the company, not in an individual's name.
- E. It does not include cash.
- F. It is appropriate for the circumstances (e.g. giving small gifts around a holiday or as a small "thank you" to a company for helping with a large project).
- G. It is of an appropriate type and value.
- H. It is given/received openly, not secretly.
- I. It is not above a certain excessive value, (in excess of \$300).

Solution Industries recognizes that the giving and receiving of gifts varies between countries, regions, cultures, and religions and that there are situations where it is inappropriate to decline a gift (i.e. when meeting with an individual of certain religion/culture who may take offence). In this instance, the gift may be accepted so long as it is declared to executive management.

Employees of Solution Industries shall not engage in or accept any form of bribery, if an employee is uncertain about whether a situation is a bribe or a gift or act of hospitality; they must seek further advice from Solution Industries executive management. Being in breach of this policy is not limited to the act of offering a bribe, but also the act of an individual accepting and/or receiving of a bribe. Any employee who knowingly breaches this policy, will face disciplinary action.