



# TAIT LLC AND SUBSIDIARIES

## TAIT Global Anti-Bribery and Anti-Corruption Policy Statement

The TAIT group of companies is committed to conducting its business activities in accordance with all applicable laws and regulations that prohibit bribery or corruption. TAIT take a zero-tolerance approach to bribery and corruption and expects all of its employees and business partners to comply with the anti-bribery and anti-corruption standards that TAIT has established as part of its ethics and compliance program.

### Laws and Regulations

TAIT is committed to complying with all applicable anti-bribery and anti-corruption laws that apply to its business activities around the world, including but not limited to, the US Foreign Corrupt Practices Act, the UK Bribery Act and all other anti-bribery and anti-corruption laws which may apply in relevant jurisdictions.

### Anti-Bribery Policy

TAIT's Anti-Bribery and Anti-Corruption Policy ("Anti-Bribery Policy") prohibits bribes, payments and other transfers of value that are illegal or improper. The Anti-Bribery Policy also contains a prohibition on using gifts or hospitality to improperly influence any business decision or those of public officials and sets out guidelines on the types of business courtesies which are consistent with TAIT's compliance expectations.

### Anti-Bribery Policy Implementation

TAIT's Anti-Bribery Policy is implemented by TAIT's Anti-Bribery and Anti-Corruption Committee ("Anti-Bribery Committee"). The committee approves and/or implements (without limitation) anti-bribery and anti-corruption training for new and existing employees, compliance resources that TAIT makes available to its employees, the due diligence procedures that are implemented with business partners, the approval requirements for the giving or receiving of gifts and hospitality, and the financial and accounting controls that have been established to maintain the adequacy of TAIT's books and records.

### Compliance Reporting and Monitoring

TAIT makes various mechanisms available for its employees and business partners to report any concerns they may have about ethical business practices (including practices which may be suspected of violating anti-bribery and anti-corruption laws). These mechanisms include confidential online workflows for reporting concerns which are reviewed by TAIT's Anti-Bribery Committee. TAIT has a non-retaliation policy against anyone who reports in good faith a compliance concern. To the extent that TAIT determines that any employee has violated its Anti-Bribery Policy, that employee will be subject to disciplinary action (including termination of employment). TAIT also conducts regular audit and monitoring to ensure its business activities are being conducted in accordance with the Anti-Bribery Policy along with other established parts of its compliance program.

### Business Partner Expectations

TAIT expects its business partners to abide by the same ethical standards with respect to anti-bribery and anti-corruption that apply to its employees. In order to make its business partners aware of these standards, TAIT has developed anti-bribery and anti-corruption compliance provisions for its written contracts with business partners and also requires certain business partners to sign compliance certifications. TAIT's business partners must commit to conducting business in an ethical and responsible manner.