

Employee Ethics, Compliance, and Conduct Policies

"Guiding Principles for Integrity, Compliance, and Ethical Conduct in the Workplace"



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Code of Business Ethics and Conduct (COBEC)

Objective:

To establish and promote a framework of ethical standards and legal compliance for all employees and stakeholders of Satwic.

Core Principles

- 1. Integrity and Honesty:** All employees must act with integrity, honesty, and fairness in all business dealings, both internally and externally. Dishonest behaviour, including falsification of records, fraud, or misleading others, will not be tolerated.
- 2. Compliance with Laws and Regulations:** Employees must comply with all applicable laws, regulations, and company policies. This includes, but is not limited to, employment laws, health and safety regulations, and industry-specific compliance standards.
- 3. Respect and Inclusivity:** Discrimination, harassment, and retaliation are strictly prohibited. Employees should promote a respectful and inclusive environment, valuing diversity and treating colleagues, clients, and stakeholders fairly.
- 4. Confidentiality and Data Protection:** Employees must protect the confidentiality of company information, client data, and any sensitive business information. Unauthorized sharing or misuse of data is prohibited and may lead to disciplinary action.
- 5. Avoiding Conflicts of Interest:** Employees are expected to avoid conflicts of interest that may affect their judgment. Any situation that could create a conflict must be disclosed to the management or HR team for guidance.
- 6. Environmental Responsibility:** Employees should support the company's commitment to sustainability by reducing waste, conserving resources, and adhering to eco-friendly practices.
- 7. Reporting Violations:** Employees are encouraged to report any known or suspected violations of the Code of Conduct, policies, or laws. Retaliation against individuals who report in good faith is prohibited.

Anti-Bribery and Anti-Corruption (ABAC) Policy

Objective

To establish guidelines and procedures for preventing bribery and corruption in all business operations.

Key Provisions

1. Prohibition of Bribery:

Bribery in any form is strictly prohibited, including offering, giving, receiving, or soliciting anything of value to influence a decision or gain an unfair advantage. This applies to interactions with government officials, business partners, and other third parties.

2. Facilitation Payments:

The company does not allow facilitation payments (small payments to expedite routine actions). Any requests for such payments should be reported immediately.

3. Gifts and Entertainment:

Gifts or entertainment should never be used to influence a business decision or as a means of obtaining favorable treatment. All employees must follow the company's gift policy and seek approval for any gifts or entertainment offered to or received from external parties.

4. Due Diligence on Third Parties:

The company will conduct due diligence on third-party vendors, suppliers, and business partners to ensure compliance with anti-corruption laws and standards.

5. Training and Awareness:

Employees must complete ABAC training annually and are encouraged to seek guidance if they are unsure about any situation.

6. Reporting and Investigation:

Employees should promptly report suspected bribery or corruption incidents. Reports can be made confidentially, and retaliation against whistleblowers is prohibited.

Business Gift Policy

Objective

To establish clear guidelines for giving and receiving business gifts to avoid conflicts of interest or perceptions of improper influence.

Guidelines

1. Appropriate Gifts and Entertainment:

- Gifts of nominal value (e.g., branded pens, mugs, or event tickets) are generally acceptable.
- Entertainment should be reasonable, infrequent, and appropriate for a professional setting.
- Gifts should never be offered or received as an explicit or implicit exchange for business.

2. Approval and Disclosure:

- Gifts or entertainment exceeding a specific value (e.g., \$50) must be disclosed and approved by the relevant supervisor.
- Employees are encouraged to consult their manager if they have questions about the appropriateness of a gift or entertainment.

3. Prohibited Gifts:

- Cash gifts or equivalents (e.g., gift cards) are strictly prohibited.
- Gifts that could influence or appear to influence business decisions, particularly with public officials or clients, are not allowed.
- Extravagant gifts, personal favors, or offers of hospitality that go beyond customary business practices are not allowed.

4. Seasonal or Cultural Gifts:

- Gifts exchanged during cultural or seasonal celebrations should be modest and reflect common customs.
- Employees should consider cultural differences and ensure that gifts given or received align with these customs without suggesting favoritism.

5. Record-Keeping:

- All gift exchanges should be documented in a designated log or record system.
- Employees should maintain accurate records of any business entertainment and be prepared to provide documentation upon request.