

**Purpose:**

This anti-bribery policy exists to set out the responsibilities of Unity Manufacturing Company and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for those working for Unity Manufacturing Company. It helps them recognize and deal with bribery and corruptions issues, as well as understand their responsibilities.

**Policy Statement:**

Unity Manufacturing Company is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. Unity Manufacturing Company has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

Unity Manufacturing Company will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate.

Unity Manufacturing Company recognizes that bribery and corruption are punishable by law. If our company is discovered to have taken part in corrupt activities, we may be subjected to fines, be excluded from tendering public contracts, and face serious damage to our reputation. We commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. A bribe could be used to gain commercial, contractual, regulatory, or personal advantage.

This policy applies to all employees including temporary employees, consultants, contractors, or any other person or persons associated with us.

**What is and what is NOT acceptable;**

Unity Manufacturing Company accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or business advantage, or as an explicit or implicit exchange for favors or benefits.
- It is not made with the suggestion that a return favor is expected.
- It is in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (example: a voucher or gift card)
- It is appropriate for the circumstances (example: giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.

- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the HR department.

As good practice, gifts given and received should always be disclosed to the HR department. Gifts from suppliers should always be disclosed.

**Employee Responsibility:**

Employees must not engage in any form of bribery, whether it be directly, passively, or through a third party (such as an agent or distributor). Employees must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or an act of hospitality they must seek further advice from the HR department.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the HR department.

Unity Manufacturing Company will ensure that no one suffers detrimental treatment and/or retaliation as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to a potential act of bribery or corruption.

If you have reason to believe you have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your supervisor or the HR department immediately.

If any employee breaches this policy, they will face disciplinary action up to and including termination.