



Anti-Corruption and Anti-Money Laundering Compliance Policy of QM Technologies Inc.

A. Anti-Corruption and Anti-Money Laundering Policy Statement

QM Technologies Inc., including its subsidiaries (collectively, “We,” “Us,” “QM” or the “Company”), is committed to conducting its business ethically and to complying with all applicable laws regarding prevention of bribery and corruption (“ABAC Laws”), and anti-money laundering and counter-terrorism financing laws (“AML/CFT Laws”). Understanding these laws and ethical standards is essential, and the Company will not tolerate any form of bribery, corruption, money laundering, terror financing, or other fraudulent activities.

Our policies and procedures must be followed, even if doing so may occasionally result in losing business. Failing to follow these procedures can result in severe criminal and civil consequences for the Company and the individuals involved. Any staff member, including directors, who knowingly infringes this Anti-Corruption and Anti-Money Laundering Compliance Policy (the “Policy”), violates any ABAC or AML/CFT Laws, or withholds information concerning an infringement or violation, will be the subject of disciplinary proceedings, up to and including dismissal. Third-parties acting on behalf of the Company who knowingly infringe this Policy or violate any ABAC or AML/CFT Laws will have their business relationship with the Company terminated.

Any questions, matters, or incidents concerning this Policy should be immediately referred to the Company’s legal counsel, the Company’s designated Compliance Officer. The Compliance Officer may designate specific responsibilities and supporting functions to personnel under their authority.

Itamar Sivan 20 February, 2025

CEO

Date

Date	Version
February 2025	1.0

B. Introduction and Scope of Policy

This Policy is mandatory and applies to all directors, officers and employees (full-time and part-time) of the Company, and all contractors who devote all or substantially all of their time to the Company. It also applies, where and as relevant, to "Business Associates" of the Company, such as resellers, distributors, brokers, finders, agents, consultants, subcontractors, and other third parties that act on the Company's behalf (collectively, "**Covered Persons**").

The Company is committed to acting professionally, fairly, and with integrity in all its business dealings. As part of its commitment to ethical engagement and business, the Company will not tolerate any form of bribery, corruption, money laundering, terror financing or other fraudulent activities. Accordingly, Covered Persons are strictly prohibited from offering, paying, soliciting, or accepting bribes or kickbacks (including facilitation payments), or from conducting financial transactions where the other party is non-identified.

This Policy outlines the procedures, principles and behavior required to support this commitment.

C. Risk Assessment

This Policy is founded on a regular corruption risk assessment which is the key to its effectiveness. A comprehensive risk assessment provides the Company with a comprehensive view of the significant inherent bribery risks. The risk assessment consists of a continuing procedure that identifies and analyzes bribery and corruption risks throughout the organization and evaluates the potential for the occurrence of corruption and bribery. The Compliance Officer will regularly, and at least yearly, conduct the risk assessment and determine the potential risks. The risk assessment conclusions will be forwarded to the Board and management for further discussion. The risk assessment process, its findings, and the conclusions of the discussion by the Company's board of directors will be documented and maintained in accordance with the Company's record keeping policy.

D. Relevant Anti-Corruption and Anti-Bribery Laws

1. International Landscape

Corruption and bribery are cross-border phenomena that undermine good governance and economic development and distort competition in the international market. The international community has addressed these issues through several international anti-corruption conventions at the UN, the OECD, and other international bodies and organizations. States that are parties to such international conventions undertake commitments to adopt and implement anti-corruption and anti-bribery principles in their domestic legal systems. As a result, anti-bribery laws exist in most countries around the world. We focus below on the laws of significant territories where the Company or its subsidiaries are either incorporated, conduct business, or wish independently to align with their ABAC Laws, including Israel, the US and the UK. Regardless, the Company requires compliance with the laws of all countries that apply to the Company's business, and Covered Persons should seek local legal advice where relevant.

2. National Landscape

Domestic legislation prohibits bribery and corruption regarding *local* public officials in most countries. However, given their transnational dimension and the above-mentioned international conventions, most countries have also adopted legislation explicitly addressing the issue of bribing *foreign* public officials. In addition to this, in certain jurisdictions there is also domestic legislation that addresses bribery committed between private parties.

(1) Israel

- 2.1.1. The Israeli Penal Law – 1977: Section 290 of the Penal Law prohibits bribery of a (local) public official and Section 291A prohibits bribing a foreign public official with the purpose to obtain, secure or promote business activity. The offence needs to be committed, at least in part, in a foreign country, engaging a public official of a foreign country or an international organization. Individuals face potential fines and imprisonment up to seven years under the anti-bribery provision of the Israeli Penal Law.
 - 2.1.2. The Public Service Gifts Law, 5740-1979: It prohibits public officials from acquiring an asset or receiving a service or other benefit without consideration. The prohibition also includes invitations and tickets for shows and events the entrance to which requires payment of an admission fee, either without consideration or at a reduced cost, unless the event is held within the framework of fulfillment of the public officer's role.
- (2) The US
- 2.2.1. **The US Foreign Corrupt Practices Act ("FCPA")** prohibits the payment of bribes to foreign officials assist in obtaining or retaining business. The FCPA applies worldwide and extends to publicly traded companies and their officers, directors, employees, stockholders, and agents. The law applies to US citizens, permanent residents and US companies, or any person acting on their behalf, as well as to non-US individuals and companies who breach the rules in a manner that is deemed to have sufficient connection with the US. The FCPA contains anti-bribery provisions that prohibit individuals and businesses from bribing foreign government officials to obtain or retain business, and accounting provisions that impose certain record-keeping and internal control requirements. To violate the FCPA, a payer of bribery must have the intent to improperly influence the government official. Corporations who violate the FCPA face significant fines. Individuals face potential fines and imprisonment for up to five years under the anti-bribery provision and up to 20 years under the accounting provisions.
 - 2.2.2. Domestic Bribery in the US - **18 USC Section 201** prohibits (1) giving, offering or promising anything of value to a public official and (2) paying or receiving gratuities. For prohibition (1), the bribe must be proven to have been given "corruptly", and the government needs to prove that the public official accepted, solicited or agreed to accept in return for the performance of an official act (influence of the act will suffice). Regarding the prohibition (2), it is only required that the item of value that is knowingly or willfully being offered or given would be for or because of an official act. The violation of these prohibitions may entail a fine of up to 250,000 USD and imprisonment of up to 15 years for prohibition (1) and up to two years for prohibition (2).
- (3) The UK
- 2.3.1. The **UK Bribery Act** prohibits to offer, promise, give, receive and request something of value. Bribes are criminalized in relation to both public and private sectors. Additionally, the failure to prevent bribery by a commercial organization constitutes a separate offense. The Bribery Act applies to any offenses in the UK and to offenses outside the UK where they are committed by British citizens, UK residents, or bodies incorporated in the UK, even in some cases where they are customary locally or permitted under local law. Individuals who commit bribery can be subject to up to ten years imprisonment or unlimited fines. Companies that commit an offense may also face significant penalties, confiscation of the benefits of any tainted contract and debarment from tendering for public procurement work and other government contracts.

E. Bribery

3. What is Bribery?

Bribery involves the direct or indirect giving or offering money, a gift or something else of value to someone in business or government in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit. Bribes can include:

- Monetary payments;
- Lavish gifts, entertainment, or travel expenses, particularly where they are disproportionate, frequent or provided in the context of ongoing business negotiations;
- Cash payments by employees or third persons such as consortium members, introducers, or consultants;
- The uncompensated use of company services, facilities, or property;
- Loans, loan guarantees or other extensions of credit;
- Providing a subcontract to a person connected to someone involved in awarding the main contract;
- Engaging a local company owned by, offering an educational scholarship to, or assisting with the employment or hiring of a member of the family of a potential customer/public official.
- Providing any item of value. “Item of Value”, for the purpose of this Policy, is broadly defined to include both financial and non-financial advantages. Items of value include, for example, gifts, entertainment, favors, services, loans and loan guarantees, rebates, in-kind contributions, contractual rights or interests, the use of property or equipment, job offers (including to family members), transportation, the payment of expenses or debts or anything to which economic value could attach.

4. Gifts and Hospitality

We will not be influenced by gifts or favors of any kind, nor will we use gifts or entertainment to influence our customers or potential customers. Cash is not to be given nor received. The exchange or provision of modest gifts and hospitality must be strictly limited in value and frequency, in keeping with customary business practice and in accordance with all applicable laws.

5. When are gifts or hospitality acceptable?

Covered Persons should use their own judgment to assess what is acceptable, taking account of this Policy and the requirements for approval below. Modest gifts and hospitality may usually be offered or accepted provided there is no expectation or belief that something will be given in return.

Modest gifts and hospitality may include:

- Small gifts, including gifts of nominal value such as calendars, diaries, pens, and other small promotional items such as samples;
- Occasional modest meals with people with whom you conduct business;
- Necessary and reasonable travel and accommodation expenses in connection with legitimate business trips. Useful tests for determining the inappropriateness of a gift (including in this respect meals, entertainment, travel, and accommodation) are:
 - (1) If the gift would create embarrassment or obligation for the giver or receiver; or
 - (2) If the action could not stand up to public scrutiny.

Covered Persons must **always** seek prior approval for receiving and giving/offering:

- Any gift whose value exceeds \$100; or
- Entertainment/hospitality (*e.g.*, a meal, invitation to a show, business trip expenses, or a combination of these activities) that exceeds \$150.

Any offer to Covered Persons of a gift or other forms of hospitality that exceeds nominal value, or that seems inconsistent with common business practices, should be immediately reported to the Compliance Officer as well as the Covered Persons' direct manager. If a Covered Person receives an unexpected gift or hospitality that appears to exceed the approval limits, they must declare the item to the Compliance Officer.

There are certain cases where gifts and hospitality are **never acceptable**, namely:

- Gifts of cash or equivalents (*e.g.*, gift certificates, loans, shares, or share options);
- Gifts and hospitality that are indecent, inappropriate, or would damage the Company's integrity or reputation;
- Gifts and hospitality that breach any local law or regulation; and
- Gifts and hospitality that the recipient is not permitted to receive by their employer/principal. If there is any room for doubt in this regard, written notice of the intention to make the gift or offer the entertainment/hospitality should be given to the recipient or the recipient's employer/principal to enable them to advise in advance if acceptance by the recipient would contravene any applicable policies/local law.

6. Rules for Providing Gifts

- Give all gifts in an open and transparent manner.
- Know your recipient – do not give gifts to foreign or domestic officials.
- All gifts and hospitality, which require approval, will be fully documented in a gifts and hospitality register (see Record Keeping section below).
- Gifts should be given only to reflect gratitude or appreciation and not as a method to obtain business or gain an improper business advantage.
- All gifts need to be permitted under local law.
- Outward gifts and hospitality below the approval thresholds will be subject to the usual expenses approval processes. However, they will not be approved if the relevant approver considers the expense to have been inappropriate. Such an instance will be reported to the Compliance Officer.

F. Government Officials

Covered Persons are specifically prohibited from offering, promising, giving, or authorizing the giving of gifts, or any Items of Value, whether directly or indirectly, to Government Officials.

7. Who is a Government Official?

The reference to Government Officials includes any of the below as well as any such official as defined by any relevant legislation:

- Officers and employees of government agencies and departments of all levels, including anyone who holds a military, law enforcement, legislative, administrative, or judicial position (including but not limited to arbitration) of any kind, whether appointed or elected. Diplomats (embassy and consular staff) also fall under this category;

- Officers or employees of a state-owned or state-controlled company, or of private companies that exercise a public functions on behalf of a government, regardless of the officer's or employee's rank or title;
- Anyone who exercises a public function or acts in an official capacity on behalf of a country or territory or subdivision of a country or territory (e.g., local governments, local education authority), or any public agency of that country or territory;
- Officials or employees of public international organizations (e.g., the United Nations, the World Bank) and any person holding a public office or exercising a public function for a public international organization;
- Officers or employees of state-owned or state-controlled institutions such as universities, research institutions, and similar organizations;
- Members of royal families;
- Uncompensated honorary officials who have influence in the award of business;
- Any officer, employee, or person acting in an official capacity on behalf of a political party, including candidates for political office;
- Spouses and other immediate family members of any of the persons listed above.

8. Facilitation Payments

Facilitation payments are payments made directly or indirectly to a Government Official for the purpose of expediting or securing the performance of a routine non-discretionary governmental action, such as expediting licenses or scheduling (but not approving) inspections. Covered Persons are expressly prohibited from making or authorizing facilitation payments, directly or indirectly, regardless of local law or custom. There may be very exceptional circumstances where a facilitation payment is unavoidable (e.g., because of a threat to, or otherwise the impact on, an individual's wellbeing or safety). Any such payments must immediately be brought to the attention of the Compliance Officer and must be properly accounted for.

G. What is Money Laundering?

Money laundering is the process whereby criminals introduce the proceeds of their criminal activities into a financial system through transactions that attempt to disguise the true source of the funds. In terrorism financing, funds may originate from legitimate or criminal sources. These funds are used to finance terrorist activities. Criminals and terrorists therefore have access to large amounts of currency. However, until the currency is deposited into the banking system, their ability to utilize it is restricted.

The process of Money Laundering has three stages:

- (1) Placement, through which the funds enter the financial systems.
- (2) Layering, by which the funds pass through a complex sequence of transactions designed to make it impossible for investigators to follow a trail of evidence back to the origin of the funds.
- (3) Integration, the point at which the funds emerge from the process back into the legitimate economy in a way that they are unrecognizable as the proceeds of crime.

The broad definition of money laundering means that anybody (including Covered Persons) could be in violation of anti-money laundering and terrorist financing practices, when they become aware of, or suspect, the existence of criminal property within the business or become involved in a matter relating to a property linked to the business without reporting its concerns.

H. What is Terrorist Financing?

Terrorism financing is the provision or collection of funds and other assets, by any means, directly or indirectly, with a view to, or in the knowledge that those means will be used in full or in part by a terrorist organization or by a terrorist acting alone, even without any connection to a particular act of terrorism.

Terrorist financing may not involve the proceeds of criminal conduct, but rather an attempt to conceal either the origin of the funds or their intended use, which could be for criminal purposes. Legitimate sources of funds are a key difference between terrorist financiers and traditional criminal organizations. In addition to charitable donations, legitimate sources include foreign government sponsors, business ownership and personal employment. Although the motivation differs between traditional money launderers and terrorist financiers, the actual methods used to fund terrorist operations can be the same as or similar to methods used by other criminals to launder funds. Funding for terrorist attacks usually does not require large sums of money and the associated transactions may not be complex.

I. Due Diligence and Know-Your-Customer Procedures

9. Due Diligence and Know-Your-Customer of Business Associates and Customers

The Company could be held criminally liable for the acts of Business Associates who are involved in bribery, money laundering or terror financing when they are acting on its behalf. For this reason, thorough due diligence needs to be undertaken before engaging any agent, representative or intermediary, which may include commissioning third-party risk assessments in high-risk areas. Due diligence procedures include reviewing the identity of the Business Associate and their business history and expertise. The Company will conduct risk-based anti-corruption and anti-money laundering due diligence prior to the engagement of a Business Associate to ensure that it is a *bona fide* and legitimate entity, is qualified for the purpose of its engagement and generally maintains standards consistent with the ethical and reputational standards of the Company.

Engaging with third-parties may, under certain circumstances, pose certain risks in relation to AML/CFT Laws. Therefore, it is important that the Company knows and is able to identify third-parties it conducts business with where there are such risks of money laundering or terror financing. In the world of prevention of money laundering, these identification processes are usually known as a Know-Your-Customer (or KYC) process. The KYC process is similar to a due diligence, and it involves obtaining basic information about the entity in question.

The Company recognizes that corruption and money laundering risks can vary by location, type of transaction and customer, and, accordingly, this Policy requires enhanced diligence and identification procedures for engaging with third-parties in circumstances that present a higher perceived risk of corruption or money laundering.

Information identified and received during the due diligence process, including any "red flags", will be reviewed by the Compliance Officer, who may also consult with the Company external legal counsel, as applicable, and should be maintained in a due diligence file regarding the potential Business Associate. Based on the identified risks, the Company may impose additional controls and/or restrictions concerning potential or existing Business Associates.

A "red flag" is a fact pattern, situation, request, or circumstance indicating a possible anti-bribery or anti-corruption compliance risk. **Annex A** to this Policy includes examples of "red flags", which are illustrative and not exhaustive. In case of doubt whether a particular fact or information known to a Covered Person constitutes a "red flag," please enquire with the Compliance Officer.

10. Monitoring Business Associates

Due diligence is a continuous process, and the Company will monitor its Business Associates' conduct, to the extent commercially reasonable, to ensure their ongoing compliance with ABAC and AML/CFT Laws and regulations. Covered Persons are required to monitor for and promptly report any “red flags” or other concerns that raise anti-bribery or anti-corruption concerns to the Compliance Officer.

11. Financial Arrangements

All financial arrangements made with a Business Associate must be reasonable in relation to the products sold to, or *bona fide* services rendered by, such Business Associate to or on behalf of the Company. The Company should never make payments to a Business Associate in cash. Instead, it should make it to the Business Associate's bank account in the country where the services are provided, or the Business Associate's offices are located. The Company shall make no payments to a Business Associate without detailed and accurate invoices that describe the services and expenses incurred.

J. Conflict of Interest

The Company is committed to maintaining honesty, integrity and fairness in all aspects of its business. A conflict of interest arises when personal interests – direct or indirect – do, or can, affect the objective and impartial performance of official duties, which may harm the rights and legitimate interests of the Company, subsidiaries, and third parties or violate anti-bribery or anti-corruption legislation. More information on the Company's procedures regarding conflicts of interest can be found in the Company's Code of Conduct.

K. Record Keeping

The Company will maintain detailed and accurate financial records that accurately reflect its transactions, use of Company assets, and other similar information, along with an appropriate system of internal controls. The records that must be maintained include information contained on phones, tablets, laptops and any other device used by Covered Persons when such information is related to the Company. Covered Persons must ensure that:

- Gifts, business entertainment, hospitality, and other expenses are properly reported and recorded;
- Payments made on behalf of the Company are supported by appropriate documentation; and
- No payments to third parties are made in cash, unless pursuant to proper petty cash disbursements.

Covered Persons are prohibited from falsifying or helping to falsify documents for concealing improper activity or any other reason.

L. Communication and Training

12. Communication

The Company will communicate its zero-tolerance toward bribery, corruption, money-laundering and terror financing to its employees, volunteers, associates, Business Associates, suppliers, contractors and other stakeholders and present the detailed policies and procedures for implementing this Policy. Communication will need to be constant and regularly renewed to ensure employees, volunteers, and contractors working within the Company stay aligned with this Policy in their daily work.

13. Training

The Compliance Officer will establish and conduct a suitable training program to help effectuate the compliance goals of this Policy and will maintain records documenting the training. The Company will provide training on this Policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this Policy.

M. Whistleblowing

The success of this Policy in preventing corruption and money-laundering relies on the diligence and commitment of all Covered Persons and Business Associates. The Company wishes to encourage its employees to make the Company aware of any practices, procedures, or circumstances that raise concerns about the Company's integrity regarding this Policy. Any employee of the Company may submit any concerns regarding (i) questionable accounting or auditing matters, (ii) bribery or improper payments, (iii) breach of this Policy, or (iv) violation of applicable ABAC and AML/CFT Laws. Complaints and concerns may be reported anonymously and confidentially through the creation of a temporary email address and sending an email to the Compliance Officer to the following address: legal@quantum-machines.co. The Company will protect the confidentiality and anonymity of the employee to the fullest extent possible.

After reviewing the complaint, the Compliance Officer shall prepare a report and its recommendations, and if it considers that the matter is of sufficient seriousness, the Compliance Officer will consider appropriate further action, including informing the CEO, external legal counsel and/or relevant authorities.

The Company does not permit retaliation of any kind against employees for complaints submitted in good faith. The Company urges any employee that believes he or she has been subjected to retaliation due to submitting a complaint, to immediately report the issue to the Compliance Officer.

The Company may reward those employees who perform active compliance actions with such policy, including completing the required training, reporting on possible violations of the Policy and/or of the applicable anti-corruption laws and providing ideas for improvement of the Policy.

N. Managing and Reporting an Incident

Anti-corruption legislation, and regulatory agencies in general, encourage voluntary self-reporting about possible wrongdoings. Failure to voluntarily self-report may result in a hostile prosecution with more penalties in the case of conviction. If the Company finds an allegation to be credible, it will consider self-reporting to the relevant authorities.

To reduce the harm and mitigate the risks, the Company will take the following actions:

- Notify the senior management and the Board immediately.
- Appoint a manager to handle the incident response.
- Initiate an immediate and thorough investigation as soon as the allegation is made.
- Consult with legal advisors to assess whether the allegation exposes the Company to any risk.

If the Company decides the incident merits self-reporting, it will disclose all relevant information about the bribery incident in question without undue delay.

O. Monitoring and Reviewing of the Policy

The Compliance Officer will review this Policy at least annually to ensure it is effective and in accordance with current best practices, and will revise and update this Policy, as necessary. Employees are encouraged to offer their feedback on this Policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Compliance Officer.

Annex A

Examples of Red Flags

Please note that the following examples are illustrative. This is not an exhaustive list.

- A request for payment in advance or prior to an award of a contract, license, concession, or other business.
- A request for reimbursement of unusual, extraordinary, poorly documented, or last-minute expenses.
- A request for payment in cash (or otherwise untraceable funds) to a numbered account or to an account in the name of someone other than the appropriate party.
- A request for payment in a country other than the one where the parties are located, especially if it is a country with limited banking transparency.
- Transactions which have no apparent purpose, and which make no obvious economic sense.
- Payment to or from countries considered high risk for money laundering or terrorist financing;
- Payments to or from countries considered to be tax havens or offshore jurisdictions;
- Overpayments followed by directions to refund a payment, especially if requested to send the payment to a third party;
- Any customer for whom the Covered Person cannot determine the true beneficial owner;
- Structuring transactions to avoid government reporting or record-keeping requirements;
- Unusually large single premiums, or a series of large premium payments;
- The customer refuses to provide the information requested without a reasonable explanation.
- The customer refuses to proceed with a transaction when asked for identification.
- When a party refuses to certify that it will comply with the requirements and prohibitions of applicable anti-bribery and anti-corruption laws and regulations or this Policy.
- Use of shell or holding companies that obscures a transaction partner's ownership without credible explanation.
- A request for a fee or kickback¹ for the use of Company products and services at the requestor's facility.
- As measured by local customs or standards, or under circumstances particular to the party's environment, the party's business is understaffed, ill-equipped or inconceivably located to undertake its proposed relationship with the Company.
- The party appears to have insufficient know-how or experience to provide the services the Company needs.

¹ For the avoidance of doubt, a kickback is a percentage of income given to a person in a position of power or influence as payment for having made the income possible: usually considered improper or unethical (e.g., rebating a portion of a contract payment to third parties or using consulting agreements to funnel payments to third parties).

- Company wire transfers that do not disclose the identity of the sender or recipient.
- In the case of engaging an agent or consultant to act on the Company's behalf in business dealings, the potential agent or consultant:
 - a) Resides or is headquartered outside the country in which the services are to be rendered, particularly if that country has a reputation for corruption or is a tax haven;
 - b) Has no established track record;
 - c) Has family members, relatives, employees, or family members of an employee that are officials in the foreign government or ruling political party, particularly if the official is or could be in a position to direct business to the Company;
 - d) Has been recommended by a foreign official of the potential government customer;
 - e) Is insolvent or has significant financial difficulties that would reasonably be expected to impact its dealings with the Company;
 - f) Insists on the involvement of third parties who bring no apparent value;
 - g) Intends to or reserves the right to assign its rights or obligations to a third party;
 - h) Displays ignorance of or indifference to local laws and regulations;
 - i) Refuses to sign a certification stating that it will not violate all relevant anti-bribery and anti-corruption laws and regulations and that it agrees to the terms of the Company's Policy.
 - j) Has undisclosed subagents or subcontractors who assist in its work;
 - k) Has undisclosed principals, associates or subcontractors with whom fees or commissions are split. Moreover, any agreement to pay any contingent fee or commission to an agent, finder or other third party that has not been approved in advance by the Company.
 - l) Is unable to provide appropriate business references;
 - m) Lacks transparency in expenses and accounting records;
 - n) Requests that false invoices or other documents be prepared in connection with a transaction;
 - o) Refuses to disclose its complete ownership, ownership structure, or other reasonable requested information;
 - p) Is the subject of credible rumors or media reports of inappropriate payments or a silent partner; or
 - q) Requests for payment disproportionate to the services provided (*e.g.*, an agent who bears financial risks on delivery of goods or performs substantial pre- or post-sales services may be entitled to greater compensation than a pure commission Agent/broker).
 - r) Proposes an agreement that is illegal under applicable local laws and regulations.

ACKNOWLEDGMENT

Anti-Corruption and Anti-Money Laundering Compliance Policy (“AML Policy”)

- I acknowledge that I have received and read the Company’s AML Policy.
- I acknowledge that I understand the standards, policies and procedures contained in the AML Policy and understand that there may be additional standards, policies, procedures and laws relevant to my position.
- I agree to comply with the AML Policy.
- I acknowledge that if I have questions concerning the meaning or application of the AML Policy, any Company policies or the legal or regulatory requirements applicable to my position, it is my responsibility to seek guidance from my manager or direct supervisor, the Compliance Officer or Human Resources.
- I acknowledge that neither this Acknowledgment nor the AML Policy is meant to vary or supersede the regular terms and conditions of my employment by the Company or to constitute an employment contract in and of itself.

(print name)

(signature)

(date)