

July 01, 2024

**POLICY STATEMENT REGARDING  
Fair Business Practices / Anti-Bribery and Fraud**

**1 PURPOSE**

1.1 BioSpectra is committed to conducting its business with honesty, integrity, and transparency. As part of this commitment, we adhere strictly to fair business practices and maintain a zero-tolerance policy towards bribery and fraud in any form. This policy statement is also referenced in our Employee Handbook: Section 6.

**2 FAIR BUSINESS PRACTICES**

2.1 We conduct our business in compliance with all applicable laws and regulations, promoting healthy competition and fair dealings in the marketplace. Our employees are expected to uphold the highest standards of ethics and integrity in their interactions with customers, suppliers, partners, and colleagues.

**3 ANTI-BRIBERY**

3.1 Bribery, whether offering, giving, receiving, or soliciting, is strictly prohibited. We do not tolerate any form of bribery or corrupt practices, including facilitation payments. Our employees are prohibited from offering or accepting gifts, hospitality, or any other inducements that could compromise their impartiality or judgment.

3.1.1 **Gifting:** To avoid actual conflicts in the appearance of conflicts and undo influence, no employee shall accept any gift of notable value, in any form whatsoever (including services, loans, article, or promise), from a partner, costumer, supplier, or applicant of BioSpectra. Whether a gift is of a notable value will be determined by BioSpectra in its sole discretion. Any employee who receives a gift from a partner, costumer, supplier, or applicant to BioSpectra should immediately disclose the receipt of the gift to his/her supervisor. Further information can be found in the BioSpectra Employee Handbook: Section 6, Work Policies and Regulations.

**4 FRAUD PREVENTION**

4.1 We are committed to preventing fraud in all aspects of our operations. This includes but is not limited to financial fraud, misrepresentation of information, falsification of records, and any deceptive practices. Employees are encouraged to report any suspected fraudulent activities promptly.



## 5 RESPONSIBILITIES

5.1 **Management:** The management team is responsible for establishing and maintaining effective controls to prevent bribery and fraud within the organization.

5.2 **Employees:** All employees are expected to familiarize themselves with this policy, understand their responsibilities, and conduct themselves accordingly.

5.3 **Reporting:** Any concerns or suspicions regarding potential violations of this policy should be reported immediately to Director of HR, the President of BioSpectra, Officer of BioSpectra, any Divisional VP or Director or use of BioSpectra Inc. confidential and anonymous “Whistle Blower” program. Which can be found in Employee Handbook, Section 1: Diversity.

5.4 **Training and Awareness:** We provide annual training and awareness programs to ensure that employees understand their obligations under this policy and are equipped to identify and prevent bribery and fraud.

5.5 **Monitoring and Review:** This policy is regularly reviewed to ensure its effectiveness and relevance. Feedback from employees and stakeholders is valued and considered in the ongoing enhancement of our anti-bribery and fraud prevention measures.

5.6 **Compliance:** Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contractual relationship, in addition to legal consequences where applicable.

## 6 APPLICATION

6.1 This Policy Statement applies to all employees, contractors, consultants, agents, and any other parties acting on behalf of BioSpectra. By adhering to these principles, we uphold our commitment to ethical business conduct and maintain the trust and confidence of our stakeholders.

## 7 CONTINUOUS IMPROVEMENT

7.1 We will continuously review and improve our policies, practices, and procedures related to fair business practices, fraud, and bribery practices to ensure alignment with internationally recognized principles and best practices.



**8 POLICY REVIEW**

8.1 This policy will be reviewed annually or as needed to ensure its effectiveness and relevance.

**Policy Approval:** Authorized person name: Paul DiMarco - Title: Sr. Vice President

A handwritten signature in black ink, appearing to read "Paul DiMarco". The signature is fluid and cursive, with a long horizontal stroke at the end.

**Paul DiMarco | Senior Vice President**  
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