

Ethics and Anti-Bribery Policy

About the Policy

It is the stated and publicly declared policy of SecureSeal Systems Ltd., and OEM Group Ltd., to conduct all of our business in an honest and ethical manner. We will take a zero-tolerance approach to bribery and corruption. The company is committed to acting professionally, fairly and with integrity in all our business dealings and relationships. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect. This policy does not form part of any employee's contract of employment and we reserve the right to amend or modify it at any time without prior notification. As with all our policies the company will regularly review this policy to ensure it remains pertinent, relevant and enforceable.

Within the Organisation – who must comply with this policy?

This policy applies to all persons working for SecureSeal Systems Ltd and OEM Group Ltd., or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

The definition of bribery

Bribery means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way.

Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

- Bribery includes offering, promising, giving, accepting or seeking a bribe.
- All forms of bribery are strictly prohibited.

Specifically, our rules of engagement include:

1. Employees must not give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received.
2. Employees may not accept any offer from a third party that is known or suspected to have been made with the expectation that a business advantage will be forthcoming.
3. Employees may not give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.

4. Employees must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Gifts and hospitality

This policy does *not* prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or, if it could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift.

Promotional gifts of low value such as branded items may be given to or accepted from existing and potential customers, suppliers, and business partners.

Record-keeping

Employees must declare and keep a written record of all hospitality or gifts given or received. Employees must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with the company's expenses policy and record the reason for expenditure.

- All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

How to raise a concern

If an employee or associate is offered a bribe, or are asked to make one, or if the employee and/or associate suspects any bribery, corruption or other breach of this policy has occurred or may occur, the Employee and/or the associate should notify one of the Company Directors as to the possible breach, as soon as possible.