

## **Anti-Bribery and Corruption :**

### **1. Introduction**

ITAR demands the highest standards of integrity and ethical conduct in its dealings. ITAR will not tolerate any bribery or corrupt practices related to its activities from its employees or partners. It is committed to transparent reporting and to taking all other reasonable measures which avoid ITAR's involvement in bribery or corruption. Bribery and corruption undermine the rule of law and the principle of fair competition. Such activities entrench bad governance, hindering efforts to alleviate poverty and often contributing to economic instability and human rights abuses. Whilst the risk of bribery exists in all geographies ,sectors and transactions, ITAR understands that steps can be taken to mitigate the inherent risk of corrupt behaviors. This Anti-Bribery and Anti-Corruption Policy (the "Policy") aims to inform ITAR management, employees and partners about our intention to closely monitor corruption risk and to take immediate action if evidence of corrupt activity is suspected.

### **2. Objective of the Policy**

The objective of this Policy is to provide a procedure by which ITAR conducts its, ensuring honest and ethical practices which reflect the highest standards of integrity and in compliance with all applicable laws and regulations.

### **3. Application of the Policy**

This Policy applies to all ITAR employees, contract staff or partners working on our behalf ("ITAR Employees"). ITAR Employees must never accept or give a bribe, facilitation payment, kickback or other improper payment under any circumstances.

#### **This includes transactions with:**

Foreign or domestic government officials; or any private company or person.

#### **This applies:**

In the conduct of domestic or international; and where payment is received directly or where it is received through a third party (agent, contractor, representative, distributor, or partner).

#### 4. **Management Responsibilities**

ITAR's management takes responsibility for encouraging a transparent and ethical culture at ITAR. Their role includes:

- (a) Regularly undertaking periodic and high-level risk assessments of its activities ;
- (b) Responsibility for ensuring that the Policy is well communicated to ITAR Employees, contractors, suppliers and partners alike; Encouraging trust and dialogue with employees, so that they can voice their concerns if they witness any dishonest activity; and Leading by example', behaving with utmost integrity always.

#### 5. **Prohibited Behaviors**

ITAR prohibits the following behaviors from ITAR Employees:

Bribery of national public officials or private sector counterparts, including facilitation payments; Bribery of foreign public officials and officials of public international organizations; Embezzlement of property in the private sector; Abuse of function; Illicit enrichment; Laundering or concealment of proceeds of crime; and Obstruction of justice.

#### 6. **Prevention of Improper Payments**

ITAR strictly prohibits the use of improper payments. This includes:

The improper or concealed use of 'kickbacks', subcontracts, purchase orders, consultancy agreements or payment of agents to secure or profit; or The direct or indirect offer, payment, soliciting or acceptance of bribes. For the avoidance of doubt this includes:

To directly or indirectly offer, give or agree to give or offer a loan, reward, advantage or benefit of any kind to a public official, political party, party official or political candidate as consideration for an act or omission by the recipient in connection with the performance of the recipient's duties or functions with the government. Examples include applications for environmental permits, customs procedures or judicial proceedings; To induce an official to use his or her position to influence any acts or decisions of government for the purposes of obtaining an advantage during; or Agree, or comply with any demands for a bribe made by a public official .

## 7. Gifts and Hospitality

ITAR recognizes that reasonable and proportionate gifts and hospitality are a legitimate contribution to good relationships between ITAR and its partners. However, judgment must be used to ensure these are reasonable and ethical. For instance:

(a) The cost or expense of a gift, meal or entertainment must be reasonable and in good faith directly connected to a legitimate promotional activity or the performance of existing contracts; When considering what is a reasonable expense, ITAR employees should consider the frequency with which such expenses are incurred for a official; ITAR Employees are forbidden from soliciting gifts or hoptites ITAR Employees must endeavor to avoid conflicts of interest and the appearance of conflicts of interest; Some examples of impermissible gifts include:

- 1- Any gift or entertainment that would be illegal (anything offered to a government official in breach of local or international bribery laws); Gifts or entertainment involving parties engaged in a tender or competitive bidding process;
- 2- Any gift of cash or cash equivalent (such as gift certificates, loans, stock, stock options);
- 3- Any gift or entertainment that is a 'quid pro quo' (offered for something in return); or Any entertainment that is indecent, or sexually oriented.

## 8. Supply Chain Risk Management

When selecting potential partners, ITAR endeavors to work with those that are likeminded in their approach to maintaining high ethical standards as well as demonstrated legal and regulatory compliance. ITAR will include risk management measures in its procurement practices, for example:

- (a) ITAR's contractual terms will contain an ethical policy, including a statement on bribery and corruption.
- (b) Before entering a new contractual relationship, ITAR will undertake:
  - (i) An internal corruption risk assessment ; and a due diligence review of the partner.

## 9. Training and Communication of the Policy

A copy of this Policy has or will be made available to all ITAR Employees as well as its auditors, legal counsel and other advisors. It is also posted on the website at [www.ITARy.org](http://www.ITARy.org). ITAR will provide periodic compliance training on this Policy and good practices. The aims of the training are :

To ensure that the Policy is consistently considered by ITAR Employees during all their dealings; and to provide practical assistance to ITAR Employees on how they should respond and exercise good judgment to situations where it may be unclear what qualifies as improper payments or corruption.

### **10. Reporting Violations**

ITAR Employees that become aware of actions which could constitute a violation of this Policy are required to report it to their immediate supervisor. However, if the ITAR Employee is not comfortable reporting the matter to their immediate supervisor, or does not feel their immediate supervisor has taken sufficient action, they are encouraged to report the matter to the Compliance Officer or the Executive Director. No ITAR Employee will suffer undue consequences for :

- a) reporting suspected or actual violations; nor if ITAR loses opportunities because of his or her refusal to pay or accept bribes .

### **11. Consequences of Non-Compliance with Policy**

Any ITAR Employee who is found to be giving or taking bribes or partaking in any other corrupt acts will be subject to disciplinary action which may ultimately lead to dismissal. The violation of this Policy may also be a violation of certain laws and, if appropriate, ITAR may refer the matter to the appropriate regulatory authorities which could lead to criminal proceedings.

### **12. Remedial Measures**

Should evidence of corrupt practices be uncovered, ITAR will consider a full range of remedial measures including but not limited to :

- (a) Voluntary restoration of damages or loss caused by the offence;

(b) Recovery of ill-gotten gains (e.g. proceeds of the corrupt act);

(c) Acceptance of an external compliance monitor; or Corrective organizational actions (e.g. removal or other disciplinary measures against responsible employees).