

Dataxis Labs Anti-Corruption, Business Ethics & Gifts Policy

Effective Date: 18-July, 2024

Dataxis Labs ("the Company") is committed to conducting business with honesty, integrity, fairness, and transparency. We maintain a zero-tolerance approach toward bribery, corruption, fraud, and unethical business practices.

This Policy establishes the Company's standards relating to:

- Anti-bribery and anti-corruption
- Ethical business conduct
- Gifts, hospitality and entertainment
- Commissions and third-party payments
- Dealings with Government Officials
- Conflicts of interest
- Reporting of unethical conduct

The objective of this Policy is to ensure compliance with applicable laws and promote ethical conduct in every business interaction.

1. Scope

This Policy applies to:

- Partners
- Officers
- Employees
- Consultants
- Contractors
- Temporary staff
- Business partners acting on behalf of the Company
- Agents and representatives

Every individual associated with the Company is expected to comply with this Policy regardless of location or business function.

2. Our Commitment

The Company is committed to:

- Conducting business ethically and lawfully.
- Competing fairly based on the quality of our services.
- Avoiding bribery and corruption in all forms.
- Maintaining accurate books and records.
- Ensuring transparency in all commercial transactions.
- Promoting a culture of integrity and accountability.

3. Zero-Tolerance for Bribery and Corruption

The Company prohibits all forms of bribery and corruption.

No employee or representative may:

- Offer or promise anything of value to improperly influence a decision.
- Request or accept a bribe.

- Authorise anyone else to pay a bribe on the Company's behalf.
- Make facilitation payments.
- Conceal improper payments through false documentation.

Bribery is prohibited regardless of local customs or business practices.

4. Business Ethics

Employees are expected to:

- Act honestly and fairly.
- Avoid deceptive or misleading conduct.
- Respect customers, suppliers, competitors and colleagues.
- Protect confidential information.
- Avoid misuse of Company assets.
- Comply with applicable laws and contractual obligations.

Business decisions shall be based solely on legitimate commercial considerations.

5. Gifts, Hospitality and Entertainment

Reasonable gifts and business hospitality may be appropriate in limited circumstances where they:

- Are lawful.
- Are infrequent.
- Are of modest value.
- Are transparent.
- Are not intended to influence business decisions.
- Would not create the appearance of impropriety.

The following are prohibited:

- Cash gifts.
- Cash equivalents (gift cards, vouchers redeemable for cash, etc.).
- Luxury travel.
- Lavish entertainment.
- Personal favours intended to influence business.
- Gifts during an active procurement or bidding process.

Employees should decline any gift or entertainment that could compromise, or appear to compromise, impartial business judgment.

6. Government Officials

Special care must be exercised when interacting with Government Officials.

No employee or representative may directly or indirectly:

- Offer money.
- Offer gifts.
- Provide entertainment.
- Sponsor travel.
- Provide personal benefits.
- Make charitable donations on behalf of a Government Official.
- Offer employment opportunities intended to influence official action.

Any legitimate interaction with Government Officials must:

- Have a genuine business purpose.

- Be properly documented.
- Comply with applicable laws.
- Receive any required internal approvals.

7. Commissions and Third-Party Payments

The Company may engage agents, consultants, or business partners only for legitimate business purposes.

Commissions or fees:

- Must be commercially reasonable.
- Must correspond to actual services performed.
- Must be supported by written agreements.
- Must be properly recorded in financial records.
- Must never be used to disguise improper payments.

The Company does not permit "success fees," referral payments, or commissions that are intended to improperly influence purchasing or regulatory decisions.

8. Third-Party Due Diligence

Before engaging intermediaries, distributors, consultants, or agents, the Company may conduct appropriate due diligence, including:

- Verification of identity.
- Assessment of reputation.
- Review of business credentials.
- Evaluation of potential compliance risks.
- Confirmation of adherence to applicable anti-corruption laws.

The Company reserves the right to terminate relationships involving unethical or unlawful conduct.

9. Accurate Books and Records

All financial transactions must be:

- Accurately recorded.
- Supported by appropriate documentation.
- Properly authorised.
- Truthfully reflected in the Company's accounting records.

Employees must never:

- Create false invoices.
- Maintain undisclosed accounts.
- Falsify expense claims.
- Conceal payments.
- Misrepresent the purpose of expenditures.

10. Conflicts of Interest

Employees must avoid situations where personal interests conflict, or appear to conflict, with Company interests.

Examples include:

- Personal financial interests in suppliers or customers.
- Hiring or supervising close relatives without disclosure.
- Accepting personal benefits from vendors.
- Using Company information for personal gain.

Potential conflicts should be disclosed promptly to management.

11. Political Contributions

The Company does not make political contributions for the purpose of obtaining or retaining business or influencing governmental decisions.

Any political contribution made in the Company's name must comply with applicable law and receive appropriate internal authorisation.

12. Charitable Contributions and Sponsorships

Charitable donations and sponsorships must:

- Serve a legitimate charitable or business purpose.
- Be properly documented.
- Be transparent.
- Never be used as a substitute for an improper payment or benefit.

13. Reporting Concerns

Employees and stakeholders are encouraged to report suspected violations of this Policy or any unethical conduct.

Reports may include concerns regarding:

- Bribery
- Fraud
- Corruption
- Improper commissions
- Gifts intended to influence decisions
- Accounting irregularities
- Conflicts of interest
- Misuse of Company assets

The Company will review reported concerns promptly and, where appropriate, investigate them in a fair and confidential manner.

14. Non-Retaliation

The Company prohibits retaliation against any individual who reports a concern in good faith or participates in an investigation.

Any act of retaliation may result in disciplinary action.

15. Compliance with Laws

The Company expects compliance with all applicable anti-corruption and business conduct laws in every jurisdiction where it operates.

Where local law imposes stricter requirements than this Policy, the stricter standard shall apply.

16. Violations

Violation of this Policy may result in disciplinary action, including termination of employment or business relationships, and may also expose individuals to civil or criminal liability under applicable law.

17. Responsibilities

Management is responsible for:

- Promoting ethical conduct.
- Supporting compliance initiatives.
- Addressing reported concerns.
- Providing appropriate oversight.

Employees are responsible for:

- Reading and understanding this Policy.
- Seeking guidance when uncertain.
- Reporting suspected violations.
- Cooperating with investigations.

18. Review of Policy

This Policy will be reviewed periodically and updated as necessary to reflect changes in applicable laws, regulations, and business practices.

Contact

For questions regarding this Policy or to report concerns, please contact:

Compliance Officer / Ethics Committee
Dataxis Labs
Email: governance@dataxis.io
Website: <https://www.dataxis.io/governance>

Statement of Commitment

Integrity is fundamental to the Company's culture. We are committed to conducting business ethically, responsibly, and transparently while maintaining the trust of our customers, employees, business partners, and the communities in which we operate.

Every employee and representative of the Company is expected to uphold these principles and contribute to an ethical business environment.