



## Anti-Corruption Policy

### **Intent**

Excalibur International has adopted this policy to ensure the ongoing success of our organization and to protect the best interests of all of our employees, vendors, customers, and the company from any illegal or damaging actions committed by individuals either knowingly or unknowingly.

This policy is to ensure that our staff refrain from and are prepared to identify bribery, fraudulent activity and corruption in order to report these activities appropriately. These procedures are intended to supplement the Global Code of Conduct Policy and to provide general guidance with respect to the prevention, investigation and remediation of bribery, fraud, and corruption.

### **Scope**

This policy applies to all Excalibur International employees and shall:

1. Identify unethical behavior and promote the awareness of bribery, fraudulent activities, and possible corruption;
2. Provide information regarding the prevention and detection of said activities;
3. Provide a consistent approach to the process of reporting and investigating allegations of bribery, fraud and corruption; and
4. Outline employee expectations.

Excalibur International will not tolerate any wrongdoing or impropriety, and will immediately take the appropriate disciplinary actions to correct the problem.

### **Unethical Behavior**

- Excalibur International will not be party to the intent or appearance of unethical practices in its business relationships, by means of bribery, fraud or possible corruption.
- Harassment or discrimination will not be tolerated.
- Improper disclosure of company trade secrets will not be tolerated.
- Employees shall not use corporate assets or business relationships for personal use or personal gain.

## **Prevention and Detection of Bribery, Fraud and Corruption:**

Mechanisms used in the prevention and detection of these prohibited activities include but are not limited to:

- Process monitoring;
- Random auditing;
- Supervision and review;
- Provision of appropriate training for new and existing staff;
- Written policies and procedures;
- Segregation of duties;
- Reconciliation of accounts; and
- Review of audits and financial records.

## **Bribery, Fraud, and/or Corruption Response Plan**

In the event that any Excalibur International employee encounters or suspects bribery, fraudulent activity or corruption, he/she is required to report this information immediately to Excalibur International Management. The report shall be investigated thoroughly, and maintained confidential. The investigator shall apply disciplinary actions, up to and including termination of employment and/or report the incident(s) to the appropriate authorities.

### **Employee Expectations**

#### Management & Executives

- In all business dealings, Company officials are required to set a prime example showing honesty and integrity.
- Shall have an open door policy allowing for the free discussion of suggestions and concerns from employees.
- Must report any conflicts of interest regarding their position at Excalibur International.
- Must report suspected violations.

#### Employees

- All employees are expected to work together to promote a workplace built on trust, accountability and openness.
- Disclose any conflicts of interests.
- Report suspected violations.

*\*Retaliation against employees who use these reporting mechanisms to raise genuine concerns will not be tolerated.*

## **Violations**

In the event that a violation of this policy occurs, Excalibur International will employ disciplinary measures that reflect the severity of the offense up to and including termination of employment. Some violations may indelibly affect our business in a negative fashion. In this case, punitive measures, including legal action may be pursued.

### **Acknowledgement & Agreement**

I, (Employee Name), acknowledge that I have read and understand the Bribery, Fraud and Anti-Corruption Policy of Excalibur International.

Further, I agree to adhere to this Policy and will ensure that employees working under my direction adhere to these guiding principles.

I understand that if I violate the rules/procedures outlined in this Policy, I may face corrective and/or punitive action, up to and including termination of employment.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Witness: \_\_\_\_\_