

# Anti-Corruption Policy

Versa Networks is committed to conducting all business operations and practices lawfully, ethically and with integrity. As part of this commitment all forms of bribery and corruption are unacceptable and will not be tolerated. This document outlines our policies to prevent acts of bribery and corruption and has been designed to comply with legislation governing bribery and corruption on a global basis.

## **Bribery:**

All forms of bribery and corruption are not tolerated, strictly prohibited and could result in disciplinary action and/or dismissal. A bribe does not actually have to take place – just a promise to giving or receiving one is strictly prohibited. Bribery is prohibited when dealing with any person whether they are in the public or private sector. Realizing that many countries have specific controls regarding dealing with public officials, this policy includes specific requirements in these circumstances.

## **Gifts:**

Giving or receiving any gifts is often an important part of maintaining and developing business relationships. All gifts should be for a genuine purpose, reasonable in cost, and given in the ordinary course of business and should comply with local laws as well as Versa's expense policy. Lavish gifts or hospitality, whether given or received are unacceptable as can be perceived as a way of receiving favorable business treatment.

## **Payments:**

Payments, no matter of what size, given to an official to increase the speed of conducting their job (example customs clearance) are generally prohibited. If there are unavoidable circumstances where a payment is needed to protect against loss of life, limb or liberty, they should be immediately reported to management and/or designated representative.

## **Third Parties:**

Appropriate diligence must be undertaken before engaging any third parties (agents, partners) that are acting on behalf of Versa Networks. All third parties are made aware of our policies, and their obligation to comply to them in any agreement.

## **Public Officials:**

Although this policy applies to both public and private sectors, there are risks when deal with public officials due to the strict local rules and regulations. Public officials can include employees of government, government owned or controlled commercial enterprise, international organizations, political parties or candidates. Management approval must be obtained for any payment (fees, gifts, hospitality, charitable donations). The provision of anything of value, including money, no matter how small, to any public official for the purpose of influencing them in their official capacity is strictly prohibited and grounds for immediate dismissal.

## **Conclusion:**

At Versa, all employees have an obligation to act with integrity and ensure we understand and comply with this policy. Ongoing compliance will be monitored and reported. Versa is committed to ensuring that employees can voice their concerns or ask for help in confidence, if needed. If an employee observes any act that may appear to be in contravention of this policy, they have an obligation to immediately report this to their management or designated representative. All reports will be treated with utmost urgency and confidentiality. Versa will not tolerate retaliation in any form against anyone raising concern or reporting what they genuinely believe to be improper, unethical or inappropriate behavior.