ANTI-CORRUPTION POLICY

It is the policy of <Organization Name> to conduct all of our work in an honest and ethical manner. We have a zero-tolerance policy for corruption or financial abuse, and we are committed to conducting ourselves professionally, fairly, and with integrity in all of our business dealings and relationships, as well as in promoting our goals.

Note: This policy is to be used in combination with our Code of Conduct Policy.

**Purpose**

The purpose of this policy is to establish controls to ensure compliance with all applicable anti- corruption regulations, as well as to ensure that the <Organization Name> conducts its business in a socially responsible manner.

DEFINITION

"**Corruption**" refers to the use of power to influence an outcome or to encourage behaviour that would not have occurred otherwise.

POLICY

Corruption is illegal under the Criminal Code of Canada.

It is <Organization Name>s policy to conduct all of its business in an honest and ethical manner. We have a zero-tolerance policy for corruption and are committed to acting professionally, fairly, and with integrity in all of its business dealings and relationships. <Organization Name> strives to avoid actions that could jeopardize the Company's integrity and reputation.

Any person involved in corrupt activity may face fines or imprisonment. Furthermore, if <Organization Name> or any of its employees or associated persons (e.g. contractors, agents, or subsidiaries) is found to have participated in corruption,<Organization Name> could face an unlimited fine, as well as significant damage to its reputation in public markets and in the countries in which it operates. As a result,<Organization Name> takes its legal obligations very seriously.

<Organization Name>, its managers, employees, consultants, or contractors are not permitted to:

* Receive a payment, gift, or generosity from a third party if you know or suspect that it is presented or offered with the anticipation that the Company will provide a business advantage in return.
* Intimidate or strike back against another employee or worker who has refused to commit corruption or has raised concerns in accordance with this policy or other policies of <Organization Name>.
* Get involved in any activity that could result in a violation of this policy.

The following is a list of activities that may indicate the possible existence of corrupt practices and should be kept in mind by all those subject to this policy:

* Transacting with a person with a bad reputation.
* Payments that are unusually large or payments where the employee does not appear to have provided significant services.
* Cash payments, as well as payments made without a paper trail or in violation of normal internal controls.
* Unusual bonuses to other personnel, with little documentation to back them up.
* Private meetings are requested by public contractors or companies interested in bidding on contracts.
* Abusing the decision-making process by failing to follow <Organization Name> policies or procedures.
* Preferences for specific transactions that are not explained.
* Invoices paid or rendered in excess of contractual amounts.

The above list is not exhaustive, and you should be on the watchful for other indicators of corrupt activity.

Responsibilities

The Employer will:

* Ensure that employees are aware of this policy and the risks of corruption to themselves and the company.
* Ensure that employees are aware of the red flags to look for when it comes to corruption, such as transactions being conducted in secret, practices that are knowingly against the law, benefits or advantages being offered, favors being requested, and so on.
* Conduct ongoing risk assessments to examine corrupt situations that employees may be exposed to and implement solutions to mitigate these dangers.
* Set up a reporting system so that employees feel comfortable approaching management with concerns, including what to do if a senior member of the team is involved in corruption.

Employees are expected to:

* Following the guidelines outlined in this policy and all anti-corruption legislation
* Familiarize themselves with the laws and regulations that govern the areas in which they do business.
* Search for corruption red flags.
* Report any corruptive activities that are discovered or suspected to the immediate supervisor. If that person is suspected of being involved, a report should be made to the next level of supervision that is not suspected of being involved.
* Comply with and cooperate with any investigation into corruptive practices.

Reporting and Investigating

If an employee has any concerns about workplace corruption, they must immediately notify a supervisor. Employees who have concerns about the conduct or actions of coworkers or supervisors must also report these incidents.

If you are afraid to report an issue of corruption or perceived corruption, you may do so anonymously by [Insert how employees can report anonymously].

<Organization Name> will investigate any reports of corruption, whether they are reported anonymously or not. <Organization Name> will involve the appropriate law enforcement authorities where applicable.

Employees who report a legitimate concern about corruption will not be retaliated against.

Breach of Policy

Employees who are in breach of this policy may face disciplinary action that may include termination of employment. Law enforcement may be notified if the situation calls for it.