

## VioPixel Ethics & Anti-Bribery Policy

Effective Date: 03/01/2019

### 1. Purpose

At VioPixel, we are committed to conducting business with the highest standards of ethics, integrity, and professionalism. Our dedication to **Transparency is Key** and **People Over Profits** ensures that all business operations are carried out in a responsible, fair, and lawful manner. This policy outlines our unwavering stance against unethical practices, bribery, corruption, and conflicts of interest, ensuring that every employee, partner, and stakeholder operates with trust, accountability, and respect.

### 2. Scope

This policy applies to all VioPixel employees, contractors, consultants, vendors, and business partners, regardless of location or role. It governs ethical business conduct, conflict of interest guidelines, and anti-bribery regulations, reinforcing our collective responsibility to uphold VioPixel's reputation and credibility.

### 3. Ethical Business Conduct

At VioPixel, ethical business practices are the foundation of our success. Every individual associated with our company is expected to:

- **Act with Honesty & Integrity:** Always conduct business in a truthful, transparent, and trustworthy manner.
- **Engage in Fair Competition:** Compete ethically and never engage in deceptive, fraudulent, or anti-competitive behaviors.
- **Respect Confidentiality:** Protect sensitive company and client information from unauthorized disclosure or misuse.
- **Demonstrate Respect & Inclusion:** Foster an inclusive, diverse, and respectful work environment, free of discrimination or harassment.
- **Exercise Accountability:** Take responsibility for actions and decisions, ensuring they align with VioPixel's core values and ethical standards.

### 4. Anti-Bribery & Corruption Policy

Bribery and corruption in any form are strictly prohibited at VioPixel. This includes, but is not limited to:

- **Bribery:** Offering, giving, receiving, or soliciting anything of value to improperly influence business decisions.
- **Kickbacks:** Providing or receiving illegal payments in exchange for business favors.
- **Facilitation Payments:** Payments made to expedite or secure routine government or business processes.
- **Improper Influence:** Attempting to sway the decisions of government officials, clients, or vendors through unethical means.
- **Money Laundering:** Concealing funds acquired through illicit means.

All employees must report any requests, offers, or suspicions of bribery or corruption to the designated compliance officer or HR department immediately.

## 5. Gifts, Hospitality & Entertainment Policy

While we value building strong business relationships, gifts and hospitality must be exchanged ethically and transparently. The following guidelines must be followed:

- **Acceptable:** Modest, reasonable, and infrequent business meals, promotional gifts, or hospitality that align with customary business practices.
- **Prohibited:** Cash gifts, expensive or excessive hospitality, gifts given to gain undue advantage, or anything that may compromise VioPixel's integrity.
- **Disclosure:** Any gift or hospitality exceeding [X] value must be reported and approved by management.

If there is any doubt about whether an exchange of gifts or hospitality is appropriate, employees must seek guidance from management before proceeding.

## 6. Conflict of Interest Policy

Employees and business partners must avoid conflicts of interest that could impair their judgment or compromise VioPixel's reputation. Conflicts of interest arise when personal, financial, or professional interests interfere with business decisions. Examples include:

- **Outside Business Interests:** Engaging in a competing business or holding financial stakes in competitors.
- **Personal Relationships:** Favoring family or friends in hiring, promotions, or business transactions.
- **Misuse of Resources:** Using company assets, proprietary information, or influence for personal gain.
- **Undisclosed Business Ties:** Entering business deals where personal interests conflict with VioPixel's interests.

Employees must disclose any potential conflicts of interest to management and remove themselves from decisions where conflicts arise.

## 7. Reporting Violations & Whistleblower Protection

VioPixel encourages all employees to speak up if they suspect unethical conduct, bribery, or conflicts of interest. We are committed to protecting whistleblowers who report in good faith.

- Reports can be made confidentially to [Designated Contact/HR].
- Retaliation against employees who report violations will not be tolerated.
- Investigations will be conducted promptly and fairly, with appropriate corrective action taken as necessary.

## 8. Compliance, Training & Enforcement

- All employees and partners must complete annual ethics and anti-bribery training.
- Non-compliance with this policy may result in disciplinary action, including termination and legal prosecution.
- VioPixel reserves the right to investigate suspected violations and take corrective action where necessary.

## 9. Our Commitment to Ethical Excellence

At VioPixel, we believe that maintaining a culture of ethical integrity is essential to our success. By adhering to this policy, we protect our brand, our people, and our future. Our **Creativity First, Transparency is Key**, and **People Over Profits** values ensure that we operate with honesty, fairness, and accountability.