



A2N Anti-Corruption Policy

- Revision Date: November 2024
- Approved By: Frank Rondinone, President

Cyber Secured!

More than just a mantra - it is a call to action - and a promise from A2N that we will keep your data, your networks, and your business secured.

Our relationships are built on trust and strengthened through honesty, integrity and the overwhelming value delivered by our team of experts.

Do you want to experience 100% peace of mind? Allow A2N to play a key role in your company's networking and cybersecurity programs.



POLICY STATEMENT

Access 2 Networks Inc. (A2N) Anti-Corruption Policy

Introduction

Our company is committed to conducting business with the highest standards of integrity and transparency. This Anti-Corruption Policy is established to prevent bribery, corruption, and unethical conduct in all our business activities, including interactions with clients, vendors, partners, and government officials. This policy aligns with the Canadian Corruption of Foreign Public Officials Act (CFPOA), Criminal Code of Canada, and other applicable international anti-corruption regulations.

Scope

This policy applies to all employees, officers, directors, contractors, consultants, and any third parties acting on behalf of the company, regardless of location. It applies to all business activities, including those conducted outside of Canada.

Zero Tolerance for Bribery and Corruption

The company has zero tolerance for bribery and corruption. This includes any offer, payment, promise, or authorization of financial or other benefits to improperly influence the actions or decisions of others. Employees and third parties are prohibited from offering, accepting, or facilitating bribes in any form.

Compliance with Laws and Regulations

All employees and representatives must comply with anti-corruption laws, including the CFPOA, the Criminal Code of Canada, and the UK Bribery Act, as applicable. Violations of anti-corruption laws are considered a breach of this policy and may lead to disciplinary action.

Prohibited Activities

Bribes and Kickbacks: Offering, giving, soliciting, or accepting bribes or kickbacks to influence business decisions is strictly prohibited.

Facilitation Payments: Even small payments made to expedite routine government actions are considered bribery and are prohibited, except where expressly permitted by law.

Gifts and Hospitality: Reasonable and infrequent gifts and hospitality are acceptable if they are of nominal value and given for legitimate business purposes. Lavish or frequent gifts, as well as anything that may appear to influence business decisions, are prohibited.

Political Contributions: The company does not make political contributions, except as permitted by law. Personal political contributions by employees must not imply company endorsement or sponsorship.



Charitable Donations: Charitable donations or sponsorships must be transparent, approved by management, and not used to gain an improper business advantage.

4. Conflict of Interest

Employees must avoid situations where their personal interests conflict, or appear to conflict, with the interests of the company. Any potential conflicts should be disclosed immediately to management or the President.

Due Diligence in Third Parties

The company expects third-party partners, vendors, and contractors to adhere to similar anti-corruption standards. A due diligence process will be conducted before engaging third parties to ensure compliance, and agreements will include anti-corruption clauses where applicable.

Record Keeping

Employees must maintain accurate and complete records of all transactions, expenses, and payments made on behalf of the company. Financial records and documentation must be transparent and verifiable to demonstrate compliance with anti-corruption laws.

Reporting Violations

Employees are encouraged to report any suspected corruption, bribery, or unethical behavior without fear of retaliation. Reports can be made to management, the President, or through the anonymous reporting hotline. The company will investigate all reports and take appropriate action.

Disciplinary Actions

Any employee or representative found to be in violation of this policy or anti-corruption laws will face disciplinary action. Violations may also result in legal consequences for both the individual and the company.

Training and Awareness

Employees will receive regular training on anti-corruption policies and practices to ensure understanding and compliance. The President or a designate will provide additional resources and guidance as needed.

Policy Review

This policy will be reviewed annually to ensure its effectiveness and compliance with applicable laws and regulations. Updates will be made as necessary.

Contact Information

For any questions or concerns regarding this policy, please contact Frank Rondinone at 416-566-4478 or frondinone@a2n.net.

Acknowledgment

I acknowledge that I have read and understood the A2N Workplace Violence and Workplace Harassment Policy. I agree to abide by this policy and understand that violations may result in disciplinary action.

Employee Name:

Signature: Date: