



ANTICORRUPTION POLICY

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UNIQUE TECHNOLOGIES ETHICAL STANDARDS

Unique Technologies is committed to ethical business practices and we expect our employees and the employees of our appointed resellers to conduct business with high ethical standards and in compliance with the law.

Unique Technology only does business with trustworthy and ethical appointed Resellers / Partners.

Corruption fosters poverty, disease, and crime. Corruption hinders economic and social development, and is bad for business. It distorts competition and hinders partners' ability to fairly participate in opportunities.

No Bribes Allowed

Unique Technologies prohibits corruption of government officials and the payment of bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector.

Unique Technologies partners must never, under any circumstances, pay or offer to pay a bribe.

All partners certify that they will comply with the Anti-Corruption Policy of Unique Technologies.

Company will comply with all applicable laws against bribery, corruption, inaccurate books & records, inadequate internal controls, and money-laundering including the U.S. Foreign Corrupt Practices Act ("Anti-Corruption Law").

Anti-Corruption Requirements:

Unique Technologies only does business with trustworthy and ethical partners.

Compliance with Anti-Corruption Laws

Unique Technologies partners shall conduct themselves with high ethical standards and comply with all applicable anti-corruption laws. No partner shall, directly or indirectly, promise, authorize, offer, or pay anything of value to any government official to improperly influence any act or

decision for the purpose of promoting the business interests of Unique Technologies.

Facilitating Payments Prohibited

Unique Technologies prohibits bribes of any kind, including facilitating payments. A facilitating payment is a payment made to secure or expedite a routine government action by a government official.

Due Diligence

Unique Technology requires that certain partners undergo due diligence procedures, typically called "vetting" before they are permitted to start or renew a business relationship with Unique Technologies. Partners must comply with Unique Technology procedures and requests for information for due diligence or "vetting" of partners.

Money Laundering Prohibited

No Unique Technology partner shall use its relationship with Unique Technology to disguise or attempt to disguise the sources of illegally obtained funds.

No Payment of Travel, Gifts, or Hospitality Expenses

Unique Technology partners are prohibited from paying expenses for travel, lodging, gifts, or hospitality for government officials on our behalf. Partners are also prohibited from using any funds provided by Unique Technology or any proceeds resulting from any Unique Technology business, to pay expenses for travel, lodging, gifts, or hospitality for government officials.

Accurate Books and Records

Partners must record payments and other compensation in their corporate books, records, and accounts in a timely manner and in reasonable detail. No undisclosed or unrecorded accounts may be established for any purpose. False, misleading, incomplete, inaccurate, or artificial entries in the books and records are prohibited.

Partners must also develop and maintain a system of internal controls to prevent the payment of bribes and provide reasonable assurance that financial statements and reporting are accurate.

No Personal Funds

Do not use your personal funds to accomplish what Unique Technology prohibits or to circumvent Unique Technology policies and procedures.

No Retaliation

Unique Technology prohibits retaliation against any partner who has, in good faith, reported a red flag or a possible violation of the law or unique technology Anti-Corruption Policy. No partner will suffer adverse consequences for refusing to pay or take a bribe, even if this results in the loss of business to Unique Technology.

Enforcement

Partners are subject to criminal and civil penalties from government authorities for violating anti-corruption laws. Unique Technology may also refer any partner who violates its anti-corruption policy to government authorities for criminal prosecution or other enforcement action, or bring suit for damages

Reporting Concerns

Partners must report concerns, red flags, and any possible or suspected violation of the law to Unique Technology using the resources described in the Reporting section.

Standards for Subcontractors

Unique Technology requires that partners hold their subcontractors and representatives to the same standard that unique technology applies to its representatives. Partners should conduct their own due diligence before hiring subcontractors and representatives to ensure they are legitimate business enterprises, qualified to perform the function for which they are being retained, trustworthy, and ethical. Partners may be held responsible for the actions of their third parties.

Interaction with other Corporate Policies

Other Unique Technologies policies impacted by, and which should be construed consistent with this Policy, include the Code of Business Conduct and Ethics, the Code of Business Conduct Escalation Procedure, Procedures for Implementing the Anti-Bribery and Anti-Corruption Policy, and the Supplier Code of Ethics.

Waiver

There is no permitted deviation or waiver from this Policy.

Discipline

Any employee of unique technology or its appointed resellers / partners who violates the terms of this Policy will be subject to disciplinary action. Any employee who has direct knowledge of potential violations of this

Policy but fails to report such potential violations to Company management will be subject to disciplinary action. Any employee who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action. In all cases, disciplinary action may include termination of employment. Any third party agent who violates the terms of this Policy, who knows of and fails to report to Unique Technologies management potential violations of this Policy, or who misleads investigators making inquiries into potential violations of this Policy, may have their contracts re-evaluated or even terminated.

Global Enforcement

Corruption is a global issue. Every country in which Unique Technology or its appointed resellers / partners operates prohibits corruption. In addition, the U.S. Foreign Corrupt Practices Act (FCPA) extends to Unique Technology and its partners' activities worldwide.

Anti-corruption laws are enforced globally and across borders.