

## **INTEGRA TECHNOLOGY**

### **INTERNATIONAL ANTI-CORRUPTION BUSINESS PRINCIPLES**

Integra has a long-standing policy forbidding bribery and corruption in the conduct of our business in the United States or abroad. Integra is committed to performing business with integrity, and acting ethically and legally in accordance with all applicable laws and regulations. We expect the same commitment from the consultants, agents, representatives or other companies and individuals acting on our behalf (“Business Associates”), as well as those acting on behalf of Business Associates (e.g., subcontractors), in connection with work for Integra.

#### **Bribery of Government Officials**

Most countries have laws that forbid making, offering or promising any payment or anything of value (directly or indirectly) to a Government Official when the payment is intended to influence an official act or decision to award or retain business. “Government Official” shall be broadly interpreted and means:

- (i) any elected or appointed Government official (e.g., a legislator or a member of a Government ministry);
- (ii) any employee or individual acting for or on behalf of a Government Official, agency, or enterprise performing a governmental function, or owned or controlled by, a Government;
- (iii) any political party officer, candidate for public office, officer, or employee or individual acting for or on behalf of a political party or candidate for public office;
- (iv) any employee or individual acting for or on behalf of a public international organization;
- (v) any member of a royal family or member of the military; and
- (vi) any individual otherwise categorized as a Government Official under law.

“Government” means all levels and subdivisions of governments (i.e., local, regional, or national and administrative, legislative, or executive). Because this definition of “Government Official” is so broad, it is likely that Business Associates will interact with a Government Official in the ordinary course of their business on behalf of Integra.

The U.S. Foreign Corrupt Practices Act (the “FCPA”) prohibits making, promising, or authorizing a payment or providing anything of value to a non-U.S. Government Official to improperly or corruptly influence that official to perform any governmental act or decide to assist a company in obtaining or retaining business, or to otherwise gain an improper advantage. The FCPA also prohibits a company or person from using another company or individual to engage in any such activities. As a U.S. company, Integra must comply with the FCPA and could be held liable as a result of acts committed anywhere in the world by a Business Associate.

#### **Anti-Bribery & Anti-Corruption Principles Governing Interactions with Governments & Government Officials**

Business Associates must communicate and abide by the following principles with regard to their interactions with Governments and Government Officials:

- Business Associates, and those acting on their behalf in connection with work for Integra, may not directly or indirectly make, promise, or authorize the making of a corrupt payment or provide anything of value to any Government Official to induce that Government Official to perform any governmental act or decide to help Integra obtain or retain business. Business Associates, and those acting on their behalf in connection with work for Integra, may never make a payment or offer any item or benefit to a Government Official, regardless of value, as an improper incentive for such Government Official to approve, reimburse, prescribe, or purchase an Integra product or service, to influence the outcome of testing, or to otherwise benefit Integra’s business activities improperly.
- In conducting their Integra-related activities, Business Associates, and those acting on their behalf in connection with work for Integra, must understand and comply with any local laws, regulations, or operating procedures (including requirements of Government entities) that impose limits, restrictions, or disclosure obligations on compensation, financial support, donations, or gifts that may be provided to Government Officials. If a Business Associate is uncertain

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as to the meaning or applicability of any identified limits, restrictions, or disclosure requirements with respect to interactions with Government Officials, that Business Associate should consult with his or her primary Integra contact before engaging in such interactions.

- Business Associates, and those acting on their behalf in connection with work for Integra, are not permitted to offer facilitation payments. A “facilitation payment” is a nominal payment to a Government Official for the purpose of securing or expediting the performance of a routine, non - discretionary governmental action. Examples of facilitation payments include payments to expedite the processing of licenses, permits or visas for which all paperwork is in order. In the event that a Business Associate, or someone acting on their behalf in connection with work for Integra, receives or becomes aware of a request or demand for a facilitation payment or bribe in connection with work for Integra, the Business Associate shall report such request or demand promptly to his or her primary Integra contact before taking any further action.

#### **Commercial Bribery**

Bribery and corruption can also occur in non-Government, business to business relationships. Most countries have laws which prohibit offering, promising, giving, requesting, receiving, accepting, or agreeing to accept money or anything of value in exchange for an improper business advantage. Examples of prohibited conduct could include, but are not limited to, providing expensive gifts, lavish hospitality, kickbacks, or investment opportunities in order to improperly induce the purchase of goods or services. Integra colleagues are not permitted to offer, give, solicit or accept bribes, and we expect our Business Associates, and those acting on their behalf in connection with work for Integra, to abide by the same principles.

#### **Anti-Bribery & Anti-Corruption Principles Governing Interactions with Private Parties & Integra Colleagues**

Business Associates must communicate and abide by the following principles with regard to their interactions with private parties and Integra colleagues:

- Business Associates, and those acting on their behalf in connection with work for Integra, may not directly or indirectly make, promise, or authorize a corrupt payment or provide anything of value to any person to influence that person to provide an unlawful business advantage for Integra.
- Business Associates, and those acting on their behalf in connection with work for Integra, may not directly or indirectly, solicit, agree to accept, or receive a payment or anything of value as an improper incentive in connection with their business activities performed for Integra.
- Integra colleagues are not permitted to receive gifts, services, perks, entertainment, or other items of more than token or nominal monetary value from Business Associates, and those acting on their behalf in connection with work for Integra. Moreover, gifts of nominal value are only permitted if they are received on an infrequent basis and only at appropriate gift-giving occasions.

#### **Reporting Suspected or Actual Violations**

Business Associates, and those acting on their behalf in connection with work for Integra, are expected to raise concerns related to potential violations of these International Anti-Bribery and Anti-Corruption Principles or the law. Such reports can be made to a Business Associate’s primary point of contact at Integra, or if a Business Associate prefers, to Integra’s Compliance Group by e-mail at [TradeCompliance.Wichita@Integra-tech.com](mailto:TradeCompliance.Wichita@Integra-tech.com).