



Anti-Corruption Policy

Policy Owner: Chief of Staff (CoS)

Effective Date: 29 July 2024

Purpose

The purpose of this Anti-Corruption Policy is to outline mTuitive's commitment to conducting business in a lawful and ethical manner. This policy sets forth guidelines to prevent corrupt practices and ensure compliance with all applicable anti-corruption laws and regulations in the jurisdictions where we operate.

Scope

This policy applies to all employees, officers, directors, and third parties acting on behalf of mTuitive, including but not limited to agents, consultants, contractors, and partners (collectively, "Representatives").

Prohibition of Corruption

mTuitive strictly prohibits corruption in any form, including but not limited to bribery, kickbacks, embezzlement, and fraud. No Representative shall, directly or indirectly, offer, promise, give, accept, or demand any bribe or other undue advantage to obtain or retain business or gain any improper advantage.

Compliance with Laws

All Representatives must comply with all applicable anti-corruption laws and regulations, including but not limited to the FCPA, the UK Bribery Act, and local laws in the jurisdictions where mTuitive operates.

Gifts, Hospitality, and Expenses

Gifts, hospitality, and expenses towards clients, potential clients, or government officials must be reasonable, modest, and intended solely to create goodwill or maintain cordial business relations. Such expenditures must comply with applicable laws and mTuitive's policies on gifts and hospitality.

Political Contributions and Charitable Donations

mTuitive does not make contributions to political parties or candidates. Charitable donations and sponsorships are permissible but must be made in compliance with applicable laws and must not be used as a subterfuge for bribery.

Record-Keeping

Accurate records of all transactions and financial activities must be maintained to reflect the true nature of such transactions accurately. No accounts may be kept "off-book" to facilitate or conceal improper payments.

Reporting and Whistleblowing

Representatives are encouraged to report any suspected violations of this policy confidentially and without fear of retaliation. mTuitive will investigate all reported instances of suspected corruption and take appropriate action.

Training and Communication

mTuitive will provide regular training on this policy and related legal requirements to all Representatives. This policy will be communicated to all employees and relevant third parties.

Enforcement and Disciplinary Action

Violations of this policy may result in disciplinary action, up to and including termination of employment or contracts, and may expose individuals and [Company Name] to criminal penalties and civil liabilities.

Responsibility

This policy is administered by the Chief of Staff. Questions regarding this policy should be directed to the Chief of Staff. This policy will be reviewed annually and amended as necessary to ensure ongoing compliance with legal requirements and best practices.

Version	Date	Description	Author	Approved by
1.0	29 Jul 2024	First Version	Corinne Ritter	CoS