

Taldor Computer Systems (1986) Ltd.

Anti-Corruption Policy

(ver. 01 - Last update May 15th, 2018)

1. Anti-Corruption Policy

- 1.1. Taldor Computer Systems (1986) Ltd. ("**Taldor**") is committed to do business ethically, honestly, and in full compliance with all laws and regulations.
- 1.2. This policy shall apply on Taldor and any of its subsidiaries, any company of its group of companies, any employee and any third parties who work with/ on Taldor's behalf, both locally and globally (such as independent contractors, consultants, agents, suppliers, vendors and others who do business with Taldor) ("**Third Parties Partners**").
- 1.3. Taldor strictly forbids offer or acceptance of bribes or kickbacks in any form, or any other moral corruption in connection with any of its business dealings, nor it will honor obligations or promises connected with illegal or corruption acts that any employee in Taldor will undertake on its behalf, to any individual, whether that individual is a government official or a private party.
- 1.4. Corruption - is an abuse of power that involves acting dishonestly or improperly in return for money, personal gain, or anything of value. It can take many forms and is not limited to interactions with the government.
- 1.5. Taldor shall take reasonable efforts to inform its employees and Third Parties Partners about this policy and Taldor's zero tolerance approach to corruption.
- 1.6. Compliance with this policy and both local and international anti-corruption laws is mandatory. Failure to do so may result in disciplinary action, including termination of employment/ business relationship with Taldor.

2. Compliance With Laws and Regulations of Anti-Corruption

- 2.1. Under Israeli law and various worldwide anti-corruption laws, it is illegal to provide cash or anything else of value (like gifts, business meals or entertainment) to individuals in order to obtain or retain business, or to secure any improper advantage. Note, that these laws usually do not prohibit receiving or giving reasonable and customary business gifts, modest meals and alike, and those may be given or received without violation however extra caution should be taken in order not to cross the forbidden line.
- 2.2. Special awareness is required were acting in an area which its environment suggests corrupt practices as there are rumors of, or a reputation for, offering or accepting bribes, either by direct kickbacks or through marketing agents.
- 2.3. Taldor's employee and Third Parties Partners are requested to speak up and not to ignore the actions of third parties in regard of bribery or corruption issues.
- 2.4. Taldor strictly prohibits expediting and facilitation payments except in limited circumstances (i.e. imminent threat to health or safety). Facilitating payment is a certain type of payment to foreign officials that although not considered to be bribery according to legislations of some states, they are still considered to be unacceptable according to Taldor's ethics policy.
- 2.5. Taldor will keep and shall request its Third Parties Partners to keep accurate records of business transactions, ensure that all relevant records, including invoices and expense reports, accurately reflect the associated business transactions, and will **in no way** misstate facts, omit critical information or modify records or reports in any way to mislead others or assist others in doing so.

- 2.6. Any Taldor's employee or Third Parties Partners that is confronted with a demand to pay a bribe or facilitation payment or is offered a kickback, shall refuse it and immediately report to Taldor's CFO.
- 2.7. When traveling abroad any Taldor's employee and Third Parties Partners (if traveling in connection with Taldor's businesses) should comply with chapter 6 of Taldor's employees traveling procedure which defines the limit of business dinners and hotel facilities are permitted to be accepted, or being offered.
- 2.8. Taldor strongly encourages any employee or Third Parties Partner that is in doubt (whether a certain payment represents a facilitation payment, have been requested to pay a facilitation payment, or you suspect one has been made) to contact Taldor's legal department. Also, Taldor's employees and Third Parties Partners should not let questionable behavior go on unchallenged, should monitor third parties closely, especially if they interact with government officials on Taldor's behalf or for Taldor's benefit, and should never ignore rumors of improper payments or other suspicious activities.