



AE Techron  
2507 Warren Street  
Elkhart IN 46517 USA

## ANTI-BRIBERY AND ANTI-CORRUPTION POLICY STATEMENT

### BACKGROUND

Our company is committed to maintaining the highest ethical standards and vigorously enforces the integrity of its business practices wherever it operates throughout the world. This policy is intended to both reflect the highest standards of ethical business conduct and reduce liability and reduce the risk of reputation damage.

### POLICY

This Policy is applicable to every employee of AE Techron, including senior executive and financial officers. The company does not take part in acts of corruption, or pay bribes or receive kickbacks either directly or indirectly. The company prohibits its employees from engaging in acts of corruption, and from paying bribes or kickbacks to, or accepting bribes or kickbacks from, public officials and private individuals such as the personnel of companies with which the company does business. It is the responsibility of all employees who are involved at any time in engaging the services of external consultants, suppliers, representatives or distributors to ensure that such individuals are made aware of the content of the company's Anti-Bribery and Anti-Corruption policy at the outset of the relationship and on a regular basis thereafter.

If any employee encounters a requirement for a facilitation payment, or any solicitation for payment that appears irregular, or believe that such requests may be required or immanent, this must be reported to management immediately.

Company employees may not offer to, or accept from, third parties, gifts, hospitality, rewards, benefits or other incentives that could affect either party's impartiality, influence a business decision or lead to the improper performance of an official duty, or offer any incentive to unfair advantage. Similarly, they may not offer or accept cash donations

Company employees must avoid situations or transactions in which their personal interests could conflict or might be seen to be in conflict with the interests of the company.

This Policy does not prohibit normal and appropriate gifts, hospitality, entertainment and promotional or other similar business expenditure, such as calendars, diaries, pens, meals and invitations to theatre and sporting events (given and received), for example, to or from Third Parties. Such normal or appropriate gifts are not considered inducements to unfair advantage or bribery.