

Parade Technologies Worldwide Anti-Bribery Policy

Parade Technologies, Ltd. and its affiliates (collectively, the “Company”) is committed to conducting business with honesty and integrity. This Worldwide Anti-Bribery Policy (“Policy”) is intended to guide the Company’s business activities so that the Company conducts business and operate under principles of fairness, transparency, integrity and ethical behavior. In cases where local law and this Policy have different standards, the higher standard applies.

This Policy applies to all Company’s employees, including executive officers, regular, temporary and contract workers (collectively referred to as “Employees” or “you” in this Policy). Company expects all Employees to uphold the highest standards of ethics and integrity in all business interactions.

Employees must use sound judgement at all times and refrain from providing or accepting anything of value to a person if the offer may be considered a bribe, even if it is not discussed in this Policy. Even the appearance of impropriety could cause reputational or legal harm to the Company.

When faced with an ethical or legal question, you should seek out guidance from the head of your department, Human Resources department or the General Counsel for advice on how to make decisions that reflect our shared values and comply with the law.

Prohibition. Parade strictly prohibits the taking or payment of bribes to anyone for any reason. Just offering a bribe, even if it is not accepted, is a violation of this Policy. Parade strictly prohibits all public and commercial bribery.

Employees shall not obtain undue or improper advantage by bribery or corruption. This prohibition covers promising, offering, authorizing, giving, asking, agreeing, receiving, soliciting or accepting anything of value, either directly or indirectly through a third party, such as distributor, sales representative, customer, vendor or supplier, (i) if it creates an expectation that the recipient will act improperly in return, or (ii) in order to obtain or retain business, to direct business or to induce or influence an action or decision to any person, or otherwise gain an improper advantage.

Forms of Bribes. Bribes are not limited to cash or cash equivalents. A bribe can be “anything of value” to the recipient or their family members or friends. “**Anything of value**” can take the form of any of the following: cash or cash equivalent such as stock or gift cards; loans; travel or entertainment expenses for leisure and not related to any business matter; cultural articles; billing schemes such as excessive discount; gifts or hospitality arrangements; charitable contribution or scholarship; recruitment or promises of future employment or superiority in employment, paid or unpaid, to the recipient or their family members; or any personal favors.

“Anything of value” that is equivalent of more than US\$75 in value is not encouraged to be given or accepted by an Employee and subject to the head of your department’s approval.

Interactions with Government Officials. While the Company prohibits all bribery, it is important to know that anti-bribery laws around the world provide serious civil and criminal penalties for giving “anything of value” to Government Officials. Extra care must be taken when interacting with Government Officials. Violations of these anti-bribery laws can have severe consequences for the Company, as well as for the individuals involved.

Hospitality, Travel & Business Gifts. The purpose of hospitality, travel, and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage.

“Hospitality” is the provision and acceptance of meals and entertainment in connection with a business relationship. “Travel” is sometimes provided in the form of cab fare, other ground transportation, or air transportation in connection with promoting Company’s products. “Business gifts” are gifts provided or accepted in the course of a business relationship. Any hospitality, travel or business gift that is equivalent of more than US\$75 in value is not encouraged to be given or accepted by an Employee and subject to the head of your department’s approval.

Appropriate hospitality, travel, and business gifts usually bear the following hallmarks:

- They are offered for a legitimate business purpose, without the intention to influence someone’s behavior to benefit Parade, or to reward someone for benefitting the Company.
- They do not exceed reasonable and customary amounts in the relevant jurisdiction or context, and are not provided frequently.
- Cash and cash equivalents are not permitted.
- They comply with local law.
- They are provided or accepted openly and transparently.
- They are provided or accepted in Company’s name, and not in your name or on your personal behalf.
- The provision or acceptance of the hospitality, travel or business gifts will not create the appearance of impropriety or otherwise bring embarrassment to the Company.
- The provision or acceptance of hospitality, travel and business gifts is properly recorded in the Company’s books and records.

Recordkeeping & Internal Controls. The Company’s books and records must be accurate and complete, and Company internal controls must never be circumvented. All business dealings should be transparently performed and accurately reflected in reasonable detail in the Company’s books and records.

Employees must keep and maintain accurate financial and other business records. Such records must evidence the business reason for making payments to third parties in sufficient detail to enable the Company to identify the date, purpose, individuals involved in, and amount of the expense. For example, employees must keep a written record of hospitality or business gifts accepted or offered that sufficiently identify the purpose of the hospitality/gift, the recipient, the value, and the date provided.

All Parade transactions must be supported by appropriate documentation. Appropriate documentation includes the terms of sales. Side arrangements are strictly prohibited.

This Policy strictly prohibits the creation or alteration of records for the purpose of concealing the true nature of a payment. Under no circumstances should false, misleading, or artificial entries be made in the books and records of the Company.

Employee’s Responsibilities & Reporting Concerns. Employees are expected to conduct business with honesty and integrity. If you have any questions about this Policy or whether something may be considered a bribe, promptly contact the head of your department, Human Resources department or the General Counsel.

Any violation of this Policy must be reported directly to the CEO or General Counsel. Parade will not discriminate or retaliate against any person who, in good faith reports any matter under this Policy. Coming forward will not necessarily protect a person from the consequences of his or her own misconduct. Anyone who attempts to retaliate will be subject to disciplinary actions, up to and including termination of employment.

Any violation of this Policy by Parade Employees will subject the person to disciplinary action, including termination of employment.