



GTC ANTI-CORRUPTION AND BRIBERY POLICY

Introduction

Corruption and bribery are detrimental practices that undermine the integrity of businesses and public institutions alike. They not only breach ethical standards but also have legal consequences, potentially leading to severe reputational harm, legal penalties, and financial losses for GTC, our contractors, and individual employees. This Anti-Corruption and Bribery Policy provides a framework for GTC to adhere to all applicable laws and regulations and effectively manage the risks associated with corruption and bribery.

Who is Covered by This Policy?

This policy applies to all GTC employees, directors, officers, and contractors under GTC's direct supervision. It encompasses activities in every GTC office worldwide, whether directly or indirectly controlled or operated by GTC, Inc. The policy also extends to joint ventures not directly controlled by GTC, with efforts made to encourage these entities to adopt similar principles.

Our Commitment

GTC is committed to conducting business fairly, ethically, and without resort to corrupt practices or bribery. This includes, but is not limited to:

- Prohibiting the offering, giving, receiving, or soliciting of any item of value to influence the actions of a government official or other person in a position of authority.
- Avoiding any involvement, directly or indirectly, in bribery or corrupt activities.
- Implementing robust due diligence procedures to prevent indirect involvement in corruption through third parties or partners.
- Establishing clear guidelines and procedures for gifts and hospitality to ensure they are not used as a disguise for bribery.
- Providing training and resources to employees to recognize and resist bribery and corruption.

Reporting and Speaking Openly

Every individual covered by this policy is responsible for upholding our commitment to anti-corruption and bribery. Employees and contractors are encouraged to speak up and report potential violations of this policy or any unethical conduct to executive staff. GTC assures that all reports will be taken seriously and investigated promptly, with a guarantee of protection against retaliation for those who report in good faith.

Consequences

Non-compliance with this policy will be treated as a serious matter. Depending on the nature and severity of the violation, consequences may range from disciplinary action to termination of employment or contractual relations. Violations may also result in legal action against the individuals involved.

Key Terms

Corruption: The abuse of entrusted power for private gain. This can include bribery, extortion, fraud, and other related activities.

Bribery: The act of offering, giving, receiving, or soliciting something of value as a means of influencing the actions of an individual holding a public or legal duty.

Due Diligence: The process of conducting a comprehensive appraisal of a business or person prior to a commercial transaction, particularly in evaluating the risk of corruption or bribery.

Gifts and Hospitality: Items or services given without expectation of anything in return, which must be evaluated to ensure they do not represent a form of disguised bribery.

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