

ANTI-BRIBERY & CORRUPTION POLICY

Anti-Bribery & Corruption

At Caylent, relationships are based on trust. At Caylent, we will never accept or pay bribes. Caylent complies with all applicable anti-bribery and anti-corruption laws and regulations in the jurisdictions where we do business. As part of our commitment to follow the law, we must observe the U.S. Foreign Corrupt Practices Act and U.S. Domestic Bribery Statute.

Generally stated, those federal statutes prohibit improperly influencing officials of governments, state-affiliated entities, and political parties, in the U.S. and abroad. However, several states and foreign countries have laws barring bribery and corruption in the private sector, and these could potentially apply as well. In any event, our commitment to ethical behavior means that we will not push these boundaries and will hold ourselves to the standards that our colleagues, customers and business partners would expect regardless of the law that applies.

Antitrust

Antitrust laws protect free enterprise and fair competition. Supporting these principles is important to Caylent. We expect all Cayliens to play their part in combating illegal practices. These include price-fixing, market sharing, output limitation or bid-rigging, and anti competitive or monopoly practices.

Anti-Money Laundering

Money laundering is the process by which money acquired through illegal means or intended for illegal purposes is converted so that it appears to be legitimately acquired or becomes untraceable. Caylent is committed to complying with all applicable anti-money laundering laws throughout the jurisdictions where we do business, and will conduct business only with reputable customers, suppliers, and business partners who are involved in legitimate business activities and whose funds are derived from legitimate sources. Cayliens are required to immediately report any suspected indications of money laundering per the process explained below.

Insider Trading

In the course of employment with Caylent, a Caylien may encounter the confidential information of our customers, partners, suppliers, or others whose securities are traded. In such event, Cayliens must not (1) buy or sell those securities, (2) recommend or suggest to others that they buy or sell those securities, or (3) communicate the information to another person who would be likely to use the information to buy or sell securities. Insider trading is prohibited by law and breaches of this prohibition may result in fines and/or imprisonment. A breach of this insider trading policy is also grounds for disciplinary action, including suspension or termination of employment.

Human Trafficking, Child Labor, Forced Labor

Caylent recognizes its responsibility to protect human rights. Caylent does not tolerate forced labor or human trafficking in any form and Caylent will not knowingly work with third parties who engage in these practices or permit their subcontractors to engage in these practices. Caylent does not employ child labor and does not employ anyone under the applicable legal minimum age of employment. All work is performed under and in accordance with contracts that have been entered into voluntarily and Caylent does not use involuntary labor of any kind.