

**AMAYA SOLUTIONS, INC.  
DBA AMERICAN WATER CHEMICALS**

**ANTI-BRIBERY POLICY  
May 2023**

**INTRODUCTION**

Amaya Solutions, Inc. DBA American Water Chemicals (AWC) values honesty, transparency, integrity, and professionalism in dealings with suppliers, competitors, clients, government officials, and all other parties.

This Policy applies to all employees, officers, directors, and independent contractors of the company worldwide. This document gives specific details on AWC's Policy prohibiting corruption in the performance of business operations and individual employee responsibilities for ensuring adherence to the Policy.

The goal is to inform personnel of their anti-corruption obligations and to ensure compliance by staff with AWC's Policy. It also provides information on how to find potential risks, deal with challenging situations, and report when those situations violate or may lead to a violation.

Questions about the Policy or its applicability to circumstances should be directed to Rudy Canezo, Treasurer ([rcanezo@membranechemicals.com](mailto:rcanezo@membranechemicals.com)) and/or Mo Malki, CEO & Technical Director ([momalky@membranechemicals.com](mailto:momalky@membranechemicals.com)).

**POLICY**

AWC's Policy is to engage in business practices in full compliance with the Foreign Corrupt Practices Act of 1977 (FCPA) in the United States, the Corruption of Foreign Public Officials Act (CFPOA) and the Criminal Code in Canada, or the Anti-Bribery Act, 2010 in the United Kingdom, together with all other anti-corruption and anti-bribery laws and regulations applicable to AWC's business anywhere in the world.

AWC has zero tolerance for any corruption in business activities. Bribes or other improper or unauthorized payments that directly or indirectly make, offer, or promise to make, kickbacks,

benefits, or advantages to any person, individual, organization, or entity, are prohibited by this Policy. A violation of this Policy can occur even if a bribe or other corrupt practice does not achieve the desired outcome.

Staff are expected to adhere to both the spirit and the letter of this Policy concerning all aspects of the AWC's business anywhere in the world. It is the responsibility of the staff to be aware of how each situation may violate or lead to a violation of this Policy and Anti-Corruption Laws.

### **GIFTS**

Gifts are commonly offered as gestures of gratitude or tokens of appreciation, but in some situations, they can also be construed as bribes. AWC does allow gifts of good faith, but they must follow the Policy.

Staff must ensure that any gifts are of value in proportion to the situation at hand, any gifts should be infrequent to avoid being perceived as an attempt to influence an act or a decision. When offering or accepting a gift, Staff should consider.

- The intended outcome must not be viewed as an attempt to influence a directed result.
- The company's reputation which if the gift was publicly known, it would be beyond reproach, and
- AWC's belief of a similar gift made by a competitor.

### **DISCIPLINARY ACTION**

If Staff should not comply with this Policy and/or Anti-Corruption Laws, they will be subject to disciplinary action up to and including termination of employment. Restitution could also be needed and a civil or criminal action against the individual could be warranted.

If Staff is involved or aware of a situation they believe may violate or lead to a violation of this Policy, they must ask for guidance from their manager or other staff in a superior position.

Tony de Almeida  
Operations Manager  
American Water Chemicals  
Email: [purchasing@membranechemicals.com](mailto:purchasing@membranechemicals.com)