



Anti-Corruption Policy

Effective date: October 8, 2024

INTRODUCTION

The law of most countries makes the payment or offer of payment of a bribe, kickback or other corrupt payment a crime, leading to fines, imprisonment and reputational harm for the companies and individuals involved. These anti-corruption laws, as amended from time to time, including the including the *Corruption of Foreign Public Officials Act* of Canada, the *Foreign Corrupt Practices Act* of the United States, the *United Kingdom Bribery Act 2010*, relevant provisions of the *Australian Criminal Code Act 1995*, as well as the local anti-corruption laws of all countries in which WorkJam Inc. ("**WorkJam**") conducts business (collectively "**Anti-Corruption Laws**"), prohibit companies and their employees and agents from directly, or indirectly through an intermediary, offering, promising to pay or authorizing the payment of money or the provision of anything of value to a foreign or domestic official, or to person doing business in the private sector, for the purpose of influencing their acts or decisions. This is the case even if such payments are common or customary in the countries in question.

1. Objective and scope

As embodied in the Code of Conduct, WorkJam is committed to ethical conduct and compliance with all applicable Anti-Corruption Laws. The purpose of this Anti-Corruption Policy (the "**Policy**") is to supplement the principles and standards of conduct set forth in the Code of Conduct and should be read in conjunction with it.

This Policy applies to all employees, interns, director or officer of WorkJam (collectively "**Employees**"), as well as to all partners, contractors, consultants, representatives and agents (and their respective owners, directors, officers and employees) working for or on WorkJam's behalf anywhere in the world (collectively "**Business Partners**").

All Employees and Business Partners are required to read and be familiar with this Policy, WorkJam executives are responsible for the compliance with this Policy within their respective business units and global functions.

2. Fundamental Rules

a. Prohibited Payments

No Employee or Business Partner may, directly or indirectly through one or more intermediaries, give, offer, or agree to give or offer, a bribe or kickback to any person, or solicit or receive a bribe or kickback from any person (a "**Prohibited Payment**").

Prohibited Payments include the payment of anything of value (in the form of cash or cash equivalents, gifts, loans, rewards, travel, entertainment or hospitality, business or employment opportunities, in-kind or free services, advantages or benefits of any kind), to or for the benefit of any foreign official, domestic official or person doing business in the private sector (an **“Individual”**), regardless of rank, for the purpose of inducing or rewarding favorable action (or withholding of action) or the exercise of influence by such Individual in contravention of applicable Anti-Corruption Laws. Prohibited Payments can take many forms, but they will often involve a “quid pro quo”, meaning that the Prohibited Payment is offered or paid in exchange for a benefit to obtain or retain a business advantage.

Bribery and corruption in the private commercial context would include (but not be limited to) making Prohibited Payments to agents or employees of existing or prospective Business Partners or customers in order to secure an advantage over competitors or against the interests of the Business Partner, customer or another party.

Employees and Business Partners must also not ignore circumstances that raise a suspicion of Prohibited Payment. For example: when an Employee of Business Partner becomes suspicious or aware of a possibility of Prohibited Payment but consciously disregards this fact and/or refrains from making a dutiful inquiry to validate the facts.

b. Facilitation Payments

“Facilitation Payments” are small payments to a government official for the purpose of expediting or securing performance of a non-discretionary routine action, such as obtaining official documents, processing governmental papers, or providing police or utility services. Facilitation Payments never include payments made for the purpose of (i) assisting in obtaining or retaining business or contracts, (ii) eliminating or reducing a tax or fee, or (iii) overlooking compliance with a requirement or regulation. WorkJam Employees and Business Partners are strictly prohibited from making or accepting any Facilitation Payments.

c. Political Contributions

No WorkJam Employee may directly or indirectly make any contribution on behalf of WorkJam to any political party or to any candidate for political office, except as permitted by applicable local law and in accordance with provisions of the Code of Conduct. Prior written approval for any political contributions that are consistent with all applicable laws and the Code of Conduct must be obtained from the President and Chief Executive Officer of WorkJam.

d. Books and Records and Internal Controls

WorkJam is committed to developing, documenting, maintaining and continually enhancing its internal accounting controls to ensure that all payments are fairly and accurately recorded in the Company’s books, records, and accounts. No undisclosed or unrecorded accounts of WorkJam

are to be established for any purpose. False, misleading, incomplete, or artificial entries are not to be made in the books and records for any reason. Personal funds, or funds of relatives or other third parties, must not be used to make any Prohibited Payment or Facilitation Payment. Finally, "off the books" payments or the destruction of the Company's books and records or documents relating to its transactions, for the purpose of concealing payments, are prohibited, regardless of the amount.

e. Guidelines for engaging Business Partners

Under Anti-Corruption Laws, an act of a Business Partner may be viewed as an act of WorkJam. Therefore, all matters pertaining to the selection, engagement, and oversight of Business Partners, including the due diligence investigation, contractual arrangements and ongoing monitoring, must comply with WorkJam's "Third Party Policy" and must involve the Legal Department.

3. Administrative measures

a. Reporting

WorkJam Employees are required to report any Prohibited Payments, or requests, offers or solicitations for same, or any other suspected violations of this Policy by any employee, Business Partner or any other service provider working for or on behalf of WorkJam, or by any other third party in connection with WorkJam's business (for example, a counter-party in a transaction), as soon as they become aware of such violations. All employee complaints or reports of violations must be addressed to the Legal Department. All reports received will be promptly and fully investigated. No person who in good faith reports improper practices or questionable acts in accordance with this Policy will suffer reprisals or retaliation of any kind, including dismissal, demotion, suspension, threats, harassment, or any other manner of discrimination in the terms and conditions of employment.

b. Disciplinary measures

In the event of a breach of this Policy or violation of Anti-Corruption Laws by an Employee, the Employee will be sanctioned, which sanction may include termination of employment and the initiation of legal action for damages where appropriate.

Business Partners who violate Anti-Corruption Laws or this Policy may face immediate termination of any contract and the initiation of legal action for damages where appropriate, among other remedies.

c. Accountability:

WorkJam's legal department is responsible for the oversight of this Policy. If you have any concerns, questions, or requests concerning this Policy, please contact the legal department by email at legal650@workjam.com.