

**PURPOSE AND INTRODUCTION**

Strauss Brands is steadfast in our commitment to the highest standards of ethical conduct and integrity in our business activities both in the United States and internationally. This policy outlines our stance on deterring and preventing bribery and corruption across all facets of our operations.

**RESPONSIBILITY**

This policy is binding on all individuals working at Strauss Brands, irrespective of their position, including but not limited to our employees at all levels, directors, officers, agency workers, agents, contractors, external consultants, third-party representatives, and business partners

**POLICY STATEMENT**Compliance with Laws

Strauss Brands strictly abides by all laws concerning anti-bribery and anti-corruption, including but not limited to the relevant provisions within the U.S. Foreign Corrupt Practices Act (FCPA) and any local anti-bribery and corruption laws applicable to our operations.

Prohibition of Bribery and Corruption

No part of Strauss Brands' operations shall engage in, condone, or be complicit in bribery or corruption in any form. This includes the prohibition of offering, giving, soliciting, or accepting any form of bribe or unauthorized payment to or from any person or entity, whether a public official, private individual, or a business entity. by

Gifts and Hospitality

Strauss Brands acknowledges that normal and appropriate hospitality is part of conducting business; however, we mandate that:

- ✓ Any gift or hospitality given or received must not be intended to influence business decisions unfairly.
- ✓ There must be no expectation of anything in return for the gift or hospitality.
- ✓ The gesture must comply with all applicable laws.
- ✓ Gifts and hospitality should be openly given and received and must not be in the form of cash or cash equivalent.
- ✓ All transactions must be transparent and properly recorded in Strauss Brands' financial records.

Record-Keeping

Strauss Brands will maintain detailed, accurate financial records and have robust internal controls in place to evidence the business rationale for making payments to third parties.

Training

Employees at Strauss Brands and any third parties acting under our authority will receive training on this policy and the laws that govern our operations, including anti-bribery and corruption statutes.

Responsibility and Reporting

Everyone within Strauss Brands is responsible for upholding and supporting our commitment to an ethical workplace. Suspected breaches of this policy must be reported immediately to the designated compliance officer. Strauss Brands will ensure confidentiality and protect those who raise concerns in good faith.

**PROGRAM NAME**

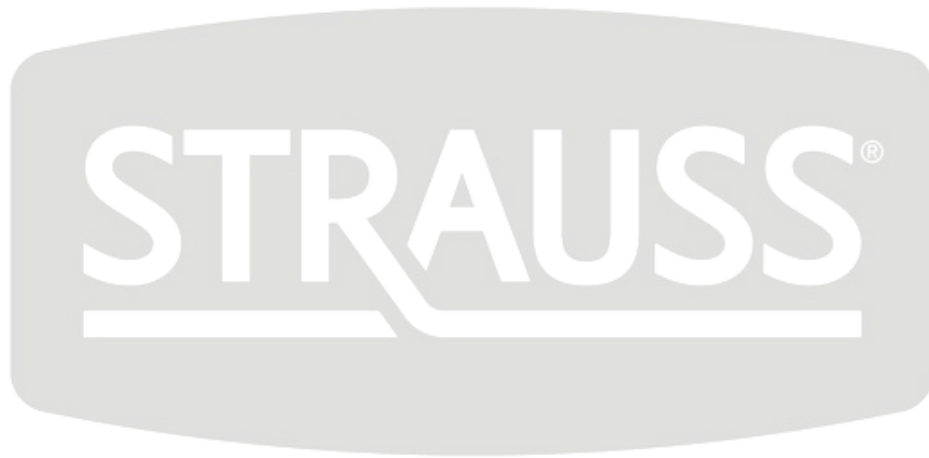
P 010 ★ Business Ethics &amp; Integrity Policy

**IMPLEMENTATION AND COMPLIANCE**

Non-compliance with this policy is taken very seriously and may result in disciplinary action up to and including termination of employment. Allegations that may involve criminal conduct will be directed to appropriate law enforcement authorities.

**RESPONSIBILITY AND REVIEW**

The ultimate responsibility for this policy lies with the senior leadership of Strauss Brands. This policy will be reviewed annually and updated as needed to ensure relevance and effectiveness in representing our employees' rights and interest



REVISION DATE	REASON FOR CHANGE	APPROVED BY
10.27.2023	Release	Elsa Kastrul