

SCS Anti-corruption and Bribery Policy

As a global company, SCS Global Services (SCS) is fully committed to complying with anti-bribery and corruption laws in every country in which it operates. No SCS employee, director, contractor, affiliate or subsidiary shall promise, offer or pay, whether directly or indirectly, any bribe to any person in order to obtain benefit for SCS. No SCS employee, director, contractor, affiliate or subsidiary shall receive or solicit to receive payment of money, money equivalent, gifts, loans, hospitality, services, discounts or anything else of value from any person or company in connection with the performance of services on behalf of SCS other than the contractually established fee for services rendered and legitimate expenses to be reimbursed in connection with the performance of such services. Customary, small, token, infrequent gifts of nominal value that are not provided with any expectation of return favor fall outside the scope of this policy.

The promise, offer, solicitation, payment or acceptance of any bribe is a violation of SCS policy and may lead to appropriate disciplinary action, up to termination.

An example of corruption would be when the Client offers or gives some benefit to an SCS Auditor as an inducement for the auditor to not issue non-conformities, visit some sites, or interview certain workers. Another would be for an SCS Auditor to request or solicit a benefit (payment, service) from the Client as an inducement for the auditor to conduct the audit in a manner favorable to the Client.

All SCS employees, contractors, affiliates and subsidiaries must report to the SCS Quality Assurance Director any incident when a bribe was offered to them or solicited from them.

Stakeholders may contact SCS to report activities where corruption may be taking place via SCS' website. SCS shall investigate instances of alleged fraud or fraudulent behavior and protect the identity of stakeholders should they wish to remain anonymous and/or to prevent retaliation.