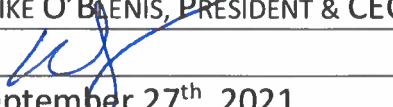




DOCUMENT TITLE:	ANTI-BRIBERY POLICY
APPROVED BY:	MIKE O'BAENIS, PRESIDENT & CEO
Signature:	
APPROVED DATE:	September 27 th , 2021
VERSION:	1.0

Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that AV Group NB Inc. business is conducted in a socially responsible manner.

Ethics

AV Group will conduct its affairs in an ethical manner. We conduct business in accordance with all applicable laws, rules, and regulations. We strive to act as a responsible corporate citizen and value the trust bestowed upon us to manage public resources in a constructive and consultative manner. We shall not offer or receive bribes of any description.

Bribe/Bribery Definition

The direct or indirect giving, offering, demanding or accepting of bribes to or from any person, government or entity is strictly prohibited.

A bribe - is a payment or other benefit (e.g. money, kickbacks) that is intended to influence the judgment or conduct of a person in a position of power, authority or trust for the purposes of:

- the improper performance or non-performance of an activity; or
- an improper business advantage; or
- rewarding a person for a business advantage that has already been given.

Bribery - is a form of corruption and consists of:

- giving, offering or agreeing to provide a bribe, or
- requesting, demanding or agreeing to accept a bribe.

Policy Statement

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised, or provided to gain a commercial, contractual, regulatory, or personal advantage.

It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. We will uphold all laws relevant to bribery and corruption.

Direction

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent distributor).

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.



All employees must notify their manager as soon as possible if you believe or suspect that a conflict or breach of this policy has occurred or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.