

### **Agents/Consultants/Subcontractors/Alliances**

We will strive to build long-term relationships and award business to third parties based on their ability to meet our needs and commitments, their reputation for service, integrity and compliance, their high standards for quality and delivery and their prices. We will not do business with third parties who are likely to harm Socrates & Soc reputation. For example, we will avoid doing business with others who intentionally and continually violate the law. These laws include, for example, local environmental, employment, safety and anti-corruption statutes. All arrangements with third parties must comply with

#### Agents and Consultants:

Commission rates or fees paid to agents, finders or consultants must be reasonable in relation to the value of the product or work that is actually being done, consistent with law, policy and local practice. We will not pay commissions or fees that we have reason to believe will become bribes.

#### Subcontractors:

Subcontractors play a vital role in fulfilling many of our contracts. That is why it is very important to ensure that our subcontractors preserve and strengthen Socrates & Soc reputation by acting consistently with our Code of Business Conduct.

#### Joint Ventures and Alliances:

Socrates & Soc strives to ally with companies that share our commitment to ethics. We will work to make the standards of our joint ventures compatible with our own.

### **Purchasing practices**

Purchasing decisions must be made based solely on Socrates & Soc best interests. Suppliers win Socrates & Soc business based on product or service suitability, price, delivery and quality. Purchasing agreements should be documented and clearly identify the services or products to be provided, the basis for earning payment and the applicable rate or fee. The amount of payment must be commensurate with the services or products provided.

### **Gifts**

It is customary to exchange gifts and entertainment among business partners. The Directors, management and all employees of Socrates & Soc are prohibited from accepting excessive or lavish gifts that may give the appearance or could be reasonably viewed as compromising, that individual's ability to make objective and fair business decisions on behalf of the Company. The Company expects from all employees to exercise reasonable judgment and discretion in accepting any gratuity or gift offered in connection with their employment with Socrates & Soc.