

Radnostix, Inc. (RNX)
Foreign Anti-Bribery and Anti-Corruption Policy

Welcome to Radnostix' policy forbidding foreign bribery and corruption, and our related certification and reporting guidelines that all employees should observe.

RNX is committed to conducting our business with integrity, and acting ethically and legally, in accordance with all applicable laws and regulations. We expect the same commitment from our business partners, distributors, consultants, agents, representatives, and all other companies and individuals acting on our benefit ("**RNX Partners**"), as well as those acting on behalf of RNX Partners (e.g., their sub-distributors and subcontractors), in connection with any RNX product or service.

Scope

As part of our commitment to business ethics, we will require each member of the RNX family of companies to sign an annual certification of compliance, including RadQual.

Government Officials

Most countries have laws that forbid making, offering or promising any payment or anything of value (directly or indirectly) to any government official¹ when the payment is intended to influence an official act or decision to award or retain business. Because we will likely encounter government officials in the normal course of doing business, especially in the healthcare sector, we need to pay particular attention so that we do not violate any laws.

FCPA

The U.S. Foreign Corrupt Practices Act (the "FCPA") prohibits making, promising, or authorizing a payment or providing anything of value to a non-U.S. Government Official to improperly or corruptly influence that official to perform any governmental act or make a decision to assist a company in obtaining or retaining business, or to otherwise gain an improper advantage. The FCPA also prohibits a company or person from using another company or individual to engage in any such activities. Moreover, the FCPA prohibits improper or false accounting and recordkeeping.

As RNX is a US public company, our compliance obligations under the U.S. FCPA are far-reaching. RNX and its subsidiaries must comply with the FCPA – as well as RNX Partners – as RNX itself could be held liable for improper acts, committed by ourselves *as well as our Partners*, anywhere in the world.

Interactions

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Government officials are broadly interpreted, and include: (1) an elected or appointed Government official (like a member of parliament or other government body); (2) an employee or individual acting for or working in a government agency, or working in a state owned or controlled entity (such as healthcare professional or purchasing manager working for a government hospital); (3) a political party officer, candidate, non-elected officer, or employee or individual acting for or on behalf of a political party or candidate for public office; (4) an employee or individual acting for or on behalf of a public international organization; (5) any member of a royal family or member of the military; and (6) any individual otherwise recognized as a government official by local law.

RNX and RNX Partners must communicate and abide by the following principles with regard when it comes to interactions with government entities and their officials:

None may never make a payment or offer any item or benefit to a government official or government department, regardless of value, as an improper incentive to purchase, reimburse, proscribe, or approve any RNX-related product or service, to influence the outcome of any product registration, or to otherwise benefit RNX's improperly.

For all our activities in any foreign country, our employees and those of RNX Partners must understand and comply with all (anti-bribery) local laws, regulations, and applicable processes (including requirements of government entities such as government owned hospitals) that impose tender/bidding rules, and limits, restrictions, and disclosure obligations on compensation, financial support/sponsorship, donations, and gifts.

Grease Payments

Facilitation payments are also prohibited. Facilitation payments are typically a nominal payment to a government official for the purpose of expediting performance of a routine, non-discretionary governmental action. These are also known as “grease payments” used to expedite licenses, permits or other approvals for which all paperwork is in order.

Commercial Bribery & Government Favor

Commercial bribery is also prohibited under our policy. RNX and RNX Partners are not permitted to offer, give, solicit or accept commercial bribery. We are also prohibited from improperly soliciting special treatment from any government agency or official. Again, most foreign countries have laws which prohibit offering, promising, giving, requesting, receiving, accepting, or agreeing to accept money or anything of value in exchange for an improper business advantage, so we must abide by those domestic laws as well.

Examples of commercial bribery and government favor include providing expensive gifts, lavish hospitality, kickbacks, or investment opportunities in furtherance of improperly inducing the registration, purchase, or use of RNX-related goods or services.

Annual Certifications

RNX Partners, such as our distributors and their sub-distributors, as well as RNX foreign companies (when we have them), will be required to sign a certification of compliance on an annual basis. Even though these companies may be outside the U.S., they will all be subject to the U.S. FCPA plus all local laws. An example of our Annual Certification is attached at the end of this policy.

Self-Reporting

RNX employees and RNX Partners are welcome (and expected) to raise concerns related to potential violations. If you ever encounter a prohibited activity, or even feel uncomfortable in a situation involving questionable business ethics, reports can be made to your supervisor, or directly to RNX management or the Legal Department. You may request anonymity if you do not feel entirely comfortable.