Anti-Bribery Policy

Policy

It is Eclipse's policy to conduct all of our business in an honest and ethical manner and to comply with the Foreign Corrupt Practices Act and similar international anti-bribery laws. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

This policy applies to all individuals working at all levels, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to Eclipse. No employee or agent of Eclipse may offer, promise or provide, either directly or indirectly, any improper gift, payment or anything of value to a government official, political party or official thereof, or candidate for political office, in order to obtain or retain business or to secure any improper advantage for Eclipse. Also, no employee or agent of Eclipse may solicit, arrange or accept bribes intended for their benefit or that of their family, friends, associates or acquaintances.

Reporting Violations

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the Company. Any employee that becomes aware or suspects that an activity or conduct which is proposed or has taken place is a bribe or is corrupt has a duty to report such behavior through appropriate channels.

Eclipse's commitment is that all reports of unethical or illegal conduct will, to fullest extent possible, be treated confidentially and will be acted on promptly. Eclipse will not tolerate retaliation of any kind against those who come forward to report suspected misconduct.