



## **Anti-Solicitation Policy**

### **Policy Brief and Purpose**

Our solicitation company policy outlines our restrictions for distributing materials and soliciting funds, donations and signatures in activities or groups. It is the policy of ATA Logistics Ltd to prohibit solicitation and distribution on its premises because when left unrestricted, such activities can interfere with the normal operations of ATA Logistics Ltd, can be detrimental to efficiency, can be annoying and can pose a threat to security.

This policy applies to all employees and Sub-Contractors as well as external visitors, partners and customers that may be on company premises during working hours.

“Workplace” refers to any area on premises where employees and Sub-Contractors work (offices, meeting rooms, reception etc.) This definition excludes cafeterias, common rooms, hallways or other places where employees and Sub-Contractors don’t usually carry out their job duties.

“Working hours” are any time during which an employee and Sub-Contractors is expected to carry out their job duties. This definition excludes meal or rest breaks.

This policy does not refer to any kind of work -related matters. Employees and Sub-Contractors can discuss and request assistance or participation in work-related projects. Discussions that fall under the purview of laws protecting unionizing are also excluded from this policy.

### **Policy Elements**

Solicitation is any form of requesting money, support or participation for products, groups, organizations or causes which are unrelated to our company. These include but are not limited to:

- Seeking funds or donations for a non-profit organization
- Asking for signatures for a petition
- Selling merchandise or services
- Requesting support for a political candidate
- Engaging in religious proselytism.

Distribution refers to disseminating literature or material for commercial or political purposes.

### **Non-employees**

All of these forms of solicitation and distribution are strictly prohibited for non-employees on company premises, unless previously authorized by senior management. Former employees and Sub-Contractors are prohibited from soliciting customers or other employees for business purposes and to their benefit in and outside of company premises. ATA Logistics Ltd may require employees and Sub-Contractors to sign a non-solicitation agreement before they leave the company.

### **Employees and Sub-Contractors**



Employees and Sub-Contractors may engage in solicitation and distribution under conditions.

They may solicit:

- Participation (active or monetary) in organizing events for another employee or Sub - Contractors. Those events include adoption/birth of a child, promotion, retiring, death, mourning and more.
- Support for a cause, charity or fundraising event sponsored, funded, organized or authorized by our company.
- Joining a group of employees for an authorized non-business purpose (recreation, volunteering etc.)
- Participation in employment related activities or groups as protected by law (e.g. trade unions.)
- Employees and Sub-Contractors may perform these actions during working hours or in our workplace as long as they do not cause large-scale problems with our everyday operations. For example, an employee or a Sub-Contractor is allowed to send an email to their colleagues to solicit assistance for a cause.

We won't accept soliciting and distributing that hinders productivity or is disruptive, offensive or obscene. For example, we prohibit the following:

- Selling goods for personal profit
- Requesting support or funding for political campaigns
- Unauthorized posting of non-work related material on company bulletin boards
- Solicitation or distribution of non-business literature towards customers, partners and vendors
- Proselytizing others to groups or initiatives that violate non-discrimination and equal opportunity policies

Employees have the legal right to refuse assistance or participation to any kind of activities or organizations. Employees and Sub-Contractors should not be forced or harassed to support fund raising events, collections, purchasing of merchandise or other activities.

This policy applies in the same manner to all individuals or groups. Our Company and managers Must not allow one group or person to engage in solicitation, while excluding others. Employees and Sub-Contractors may refer any questions or doubts to the Company Director or on-site Manager.

### **Consequences**

We may take disciplinary action ranging from reprimand to termination or Withdrawal against employees and Sub-Contractors who don't conform to this policy. Issues that may trigger such actions include but are not limited to:

- Soliciting in our workplace during working hours for illegitimate reasons.
- Making colleagues uncomfortable by being overly persistent
- Distributing material that contain hate or other offensive speech
- Embezzling or mishandling donations by other employees or Sub-Contractors for events or Causes