

LIGHT AI INC.
(formerly, Mojave Brands Inc.)
(the “Company”)

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

I. Purpose of this Policy

1. The Company is committed to conducting its business in accordance with all applicable laws, rules, regulations, and ethical standards. The purpose of this Anti-Bribery and Anti-Corruption Policy (“**Policy**”) is to highlight the commitment to full compliance by the Company, its subsidiaries and affiliates, and its officers, directors, employees and agents with Canada’s *Corruption of Foreign Public Officials Act* (“**CFPOA**”), the U.S. *Foreign Corrupt Practices Act* (“**FCPA**”), and all local anti-bribery or anti-corruption laws that may be applicable. This Policy supplements all applicable laws, rules, and corporate policies and provides guidelines for compliance with the CFPOA, FCPA, and Company policies applicable to the Company’s operations world-wide. It is not intended to supplant any local laws.

II. Application and Administration of this Policy

1. This Policy will be administered and implemented by the Corporate Governance Committee.
2. This Policy is applicable to every employee of the Company, including senior executive and financial officers and directors. This Policy also applies to the Company’s contractors and suppliers.
3. For the purposes of this Policy, a “**contractor**” or “**supplier**” is defined as a third-party entity or individual who provides, and receives payment for, services or goods related to any aspect of the Company’s operation, and includes consultants and subcontractors.

III. Definition

1. Corruption is dishonest or unethical conduct by those in positions of power, often to obtain profit or gain. Bribery is the act of offering, giving, receiving, or soliciting something of value to a person in a position of trust to influence that person’s views or conduct or to obtain an improper advantage. Forms of bribery and corruption include the provision or acceptance of:

- (a) cash payments;
- (b) phony jobs or consulting relationships;
- (c) kickbacks;
- (d) political contributions;
- (e) charitable contributions;
- (f) social benefits; or
- (g) gifts, travel, hospitality, and reimbursement of expenses.

IV. Policy Requirements

1. Company employees and agents are strictly prohibited from engaging in “**Improper Payment Activity**” which is defined as offering, paying, promising, or authorizing:
 - (a) any payment or other thing of value;
 - (b) to any person;
 - (c) directly or indirectly through or to a third party;
 - (d) for the purpose of:
 - (i) causing the person to act or fail to act in violation of a legal duty;
 - (ii) causing the person to abuse or misuse their position; or
 - (iii) securing an improper advantage, contract or concession; or
 - (e) for the Company or any other party.
2. No Company employee shall undertake any Improper Payment Activity in respect of a foreign official, a domestic official, or a person doing business in the private sector.
3. The Company’s employees must correctly record both the amount and a written description of any transaction in its records.
4. The Company’s employees must ensure that there is a reasonable relationship between the substance of a transaction and how it is described in the Company’s records.

V. Audits

1. Audits of the Company’s sites, operating units, and contractors may be conducted periodically to ensure that the requirements of this Policy and applicable procedures and guidelines are being met. Audits may be conducted internally by the Company, or externally by retained third parties. Audit documentation shall include performance improvement action plans.

VI. Discipline

1. Any employee, contractor, or supplier who violates the terms of this Policy will be subject to disciplinary action. Any employee, contractor, or supplier who has direct knowledge of potential violations of this Policy but fails to report such potential violations to Company management will be subject to disciplinary action. Any employee, contractor, or supplier who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action. In all cases, disciplinary action may include termination of employment. Any third party agent who violates the terms of this Policy, who knows of and fails to report to the Company’s management potential violations of this Policy, or who misleads investigators making inquiries into potential violations of this Policy, may have their contracts re-evaluated or terminated.