



Corporate Social Responsibility Program

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Contents

Opening Statement	4
Responsible Jewelry Council Policy Statement.....	4
Quality Policy	4
Who We Are and What We Do	4
Corporate Social Responsibility Policy.....	5
Corporate Social Responsibility Defined	5
Human Rights Policy	5
Compliance with Laws and Regulations	6
Ethical Business Practices	7
Business Integrity Policy.....	7
Economic Responsibilities.....	7
Looking after Customers	8
Environmental Sustainability	8
Environmental Policy Objectives:	9
Employee Well-being	9
Equal Employment Opportunity Policy.....	9
Health and Safety	10
Training and Development.....	10
Health and Retirement Benefits	10
Diversity and Respect	10
Anti-Discrimination/Anti-Harassment.....	11
Preventing Retaliation	11
Workplace Violence	11
Community Engagement and Philanthropy	12
Supply Chain Responsibility	12
Responsible Sourcing.....	12
Precious Metal Suppliers.....	13
Money Laundering and Terrorism.....	13
Implementation and Communication	13

Approval	14
Building a Sustainable Legacy	14
Appendix.....	15
Appendix A: Responsible Sourcing Policy	15
Appendix B: Anti-Bribery and Corruption Policy.....	16

Opening Statement

TechForm Advanced Casting Technology LLC has provided top-quality platinum castings for over 30 years, and we pride ourselves on the quality we deliver. Beyond that, we value the employees who make this quality possible, the communities we are based in, and the earth that hosts us all. We strive to make advancements not only in our manufacturing process, but also in ways we can better protect the environment. There are four main areas in which we strive to achieve preeminence as a company, aside from the quality of our products: We are continuously improving standards in ethical business practices, social responsibility, environmental impacts, and contributions to our industry and community. We commit to many initiatives that go beyond the minimum requirement, including employee safety, limitation of our carbon footprint, ethical sourcing our materials, and maintaining total transparency as we continue to learn and grow by following the program.

Responsible Jewelry Council Policy Statement

The Responsible Jewelry Council is a standards-setting organization established to promote responsible practices and ethical standards throughout the jewelry and watch industries.

The RJC has developed a benchmark standard for the jewelry supply chain and credible mechanisms for verifying responsible business practices through third-party auditing. In 2024, TechForm achieved RJC membership with the first certification audit scheduled in the second quarter of 2025. We commit to operating our business in accordance with the RJC Code of Practices. Our corporate responsibility program is in line with the RJC Code of Practices as well as the UN Sustainability goals. We commit to integrating ethical, human rights, social, and environmental considerations into our day-to-day operations, business planning activities, and decision-making processes.

Quality Policy

TechForm's Quality Policy is to deliver products and services of such excellence that TechForm becomes the first choice of customers. This can only be accomplished in an environment of understanding and meeting our customers' requirements while continually improving our process and technology. Such efforts shall be implemented in a manner that respects both the planet and people.

Who We Are and What We Do

TechForm was founded in 1994 by Teresa Frye and the late Dr. Helmut Frye. Originally serving the medical industry's need for high-temperature base metal castings, the growing demand for platinum in the jewelry industry in the early 1990s provided an opportunity for TechForm to expand into a new market. From there, TechForm quickly established itself as a renowned industry leader in platinum casting.

TechForm's unique, refractory shell casting system is uniquely optimized for the demanding needs of high temperature platinum alloys.

In 2024, TechForm launched an R & D project in gold casting with the help of two trusted customers as development partners. This resulted in extensive casting tests and metallurgical analysis of gold castings both with and without Hot Isostatic Pressing. In March of 2025, TechForm officially expanded its alloy offering to all customers to include 18k and 14k yellow gold.

While thinking big, at its heart, TechForm is a small business with less than 20 employees. Our team serves over 400 customers nationwide, and we maintain a solid reputation across the jewelry industry. Most of our customers are small, independent jewelry stores but we also serve some of the world's largest and strongest jewelry brands. Platinum is a difficult metal to cast, and most small jewelers cannot safely or reliably cast pieces internally. We offer a top-quality product for them to pass on to their customers, driving their own business success.

Corporate Social Responsibility Policy

To fully assess how TechForm affects the natural environment and its various stakeholders, we have developed a Corporate Social Responsibility Policy. It is our mission to be comprehensive in this assessment. Through our efforts, we have outlined core connections that assess the impacts our business decisions have on our community. By adhering to this policy, TechForm aims to contribute positively to the welfare of our employees, the communities we operate in, and the environment.

This policy applies to all employees, contractors, and suppliers of our company. It extends to all aspects of our operations, including but not limited to our products and services, supply chain, environmental impact, community engagement, and employee well-being.

Corporate Social Responsibility Defined

Corporate social responsibility is broadly defined as a management concept whereby companies consider the impact of their business decisions on society and the environment. We believe that all organizations must improve society's welfare and protect and mitigate the consequences that can harm the environment. We further understand TechForm's role by identifying how corporate social responsibility relates to our operations and meets our responsibilities as a business.

Human Rights Policy

At TechForm, we recognize our responsibility to respect the rights of every human being. We believe that our business has a responsibility to protect and

promote human rights in all we do. As a business, we recognize that our actions have an impact on our local community and the communities in which our stakeholders operate.

We support the 30 articles of the Universal Declaration of Human Rights, as listed by the United Nations General Assembly, and encourage all companies to adopt these rights as standard business practices.

TechForm is committed to respecting internationally recognized human rights throughout our operations and supply chains. In line with the UN Guiding Principles on Business and Human Rights, which aim to protect, respect, and remedy human rights, TechForm has drafted this policy to define our role in preventing and addressing the impact of human rights as a member of the global business community.

We commit to supporting safe and healthy working environments, freedom of association, and the effective recognition of the right to collective bargaining; eliminating discrimination in respect of employment and occupation; eliminating all forms of forced or compulsory labor; and effectively abolishing child labor as outlined in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

Compliance with Laws and Regulations

TechForm operates in accordance with all local, state, and national laws and regulations. We find our legal responsibilities essential in creating a fair and equitable business environment.

As part of our ISO 14000 compliance, we maintain a watch on environmental laws pertaining to businesses. As a manufacturer, we know we need to handle materials and chemicals in a way that protects our air and waterways.

As a business dealing in precious metals, we are under an obligation to adhere to the requirements of rules promulgated by the U.S. Department of the Treasury, Financial Crimes Enforcement Network, 31 CFR Chapter X, Part 1027, under the Bank Secrecy Act as amended by the USA PATRIOT Act of 2001. We take this act seriously and comply with a full Anti-Money Laundering (AML) program. This program is available on our website, and a hard copy is kept in our offices for our customers, employees, and suppliers to review at any time.

TechForm's Anti-Bribery and Corruption Policy discourages and prohibits any bribe or corrupt practice with any stakeholder, including offering, promising, or providing any means or value to any stakeholder, including a customer, government official, business partner, or a third party, to induce any improper action to our business and is in compliance with the Foreign Corrupt Practices Act. (see Appendix D)

Ethical Business Practices

As both an ethical business and ethical leaders, it is critical to ensure that our business actions are respectful of our stakeholders' rights. Our stakeholders are not only our customers, but include our employees, suppliers, local communities, and government organizations. We find that our responsibilities begin with taking care of our team members by creating a productive working environment that is free of discrimination and harassment. We always operate ethically and require that our suppliers and team members do the same.

Business Integrity Policy

Our company's reputation has been built on trust, transparency, and satisfaction. We believe that our business relationships can only continue to grow and prosper when everyone's values are aligned. The following Business Integrity Policy will detail what TechForm values and the requirements of everyone we do business with.

- All employees of TechForm, as well as all members of our supply chain, are expected to always operate in an ethically responsible manner. We will not do business with any person or organization that is involved in any form of financial crime.
- TechForm has a zero-tolerance policy on bribery and corruption. We do not accept or give bribes. We believe in a fair and just business environment. We strive to be transparent and ethical in all our business decisions and believe that this will provide for a robust, thriving economy.
- TechForm aims to act against money laundering and the financing of terrorism. We will not do business with any person/organization that seeks to conceal their criminal proceeds as legitimate business. Our employees are trained in detecting suspicious activity, and we will report any criminal offence to the Financial Intelligence Unit (FIU) as outlined in our AML Policy.
- Transparency is an essential requirement of all corporate responsible citizens. Transparency at TechForm starts with maintaining accurate business documentation in accordance with all local, state, national, and worldwide laws and regulations.
- We require that all our business partners respect and abide by the principles laid out in this policy. Any violation will be met with disciplinary action, up to termination of employment or business dealings.

Economic Responsibilities

One of the primary economic responsibilities in any business is to help strengthen the local economy by operating a profitable company. TechForm produces precious metal castings at a competitive price to over 400 businesses. These services provide a valuable product that, in turn, supports our customers' businesses, their employees, and communities. The jobs TechForm provides have a direct connection to the local economy. We employ 15-17 people on average and offer a starting wage above the minimum wage and annual wage

reviews and increases. Our company values the continuous improvement of our business processes to maximize TechForm's long-term financial performance, benefiting the local community as well as our customers.

Looking after Customers

TechForm employs multiple layers of quality assurance in our manufacturing process. Our quality system documentation incorporates a definitive set of quality assurance methods. We deliver quality castings and strive to integrate continuous improvements into our process through partnerships with customers, employees, and suppliers.

- ISO 9001: 2015 Compliant Quality Assurance System. This stringent system of process documentation assures consistent and repeatable products.
- X-Ray Fluorescence (XRF) of the metal supply is performed daily to ensure fineness is met.
- Hot Isostatic Pressing to ensure fully dense castings.
- Rigorous quality metrics from material suppliers through finishing and final inspection.

To achieve the IOS 9001:2015 certification, we:

- Define processes and fully document procedures that affect the quality and accuracy of our products.
- Ensure that processes are executed and implemented as documented.
- Take measures to determine that processes are effectively providing the expected results.
- Perform internal audits to ensure the process is understood and followed in all departments.
- Implement corrective actions and process improvements where needed.

We have developed specific, comprehensive quality standards and procedures that address every aspect of our operation that may affect final product quality. Quality is our highest priority. Every process is characterized by:

- Comprehensive and ongoing training for technicians
- Implementation of comprehensive process control procedures
- Use of quality records to document process status, accomplishments, feedback, and verification

Through these processes and continual improvements, our customers can be sure of the quality of a TechForm casting and give that quality to their customers.

Environmental Sustainability

TechForm recognizes the utmost importance of responsible stewardship of our environmental resources. We commit to complying with all environmental laws

and regulations and going beyond what is merely legally required of us. Our goal is to protect the environment we inherit and improve it for the future. To this end, we have developed an Environmental Management System that demands continuous innovation and improvement.

Environmental Policy Objectives:

TechForm prioritizes responsible stewardship of the environment and resources. We commit to complying with all environmental laws and regulations. To this end, we have developed an Environmental Management Plan that demands continuous innovation and improvement.

This management plan will ensure that the following objectives are integrated and met at every level of our business.

- Objective 1: Comply with applicable legal requirements and other requirements related to its environmental aspects.
- Objective 2: Conservation of natural resources by reducing, reusing, and recycling materials and purchasing products made from recycled materials.
- Objective 3: Responsible use of energy and water.
- Objective 4: Identify and implement opportunities to eliminate or mitigate pollution.
- Objective 5: Integrating environmental values into planning, decision-making, and business practices.
- Objective 6: Routine review of our performance on these targets.
- Objective 7: Educate, train, and motivate employees to carry out tasks in an environmentally responsible way.

Employee Well-being

TechForm employees make a major contribution to our business growth. Their honesty, integrity, and competence in performing the job are necessary for customer satisfaction. Our employees' ability to develop positive relationships with other employees, supervisors, and customers is essential to job performance. TechForm wants all employees to know that they are vital to the success of the company.

Equal Employment Opportunity Policy

TechForm is an Equal Opportunity Employer, providing equal employment and advancement opportunities to all individuals. We recruit, hire, and promote into all job levels the most qualified applicants without regard to race, color, national origin, religion, sex (including pregnancy, childbirth and related medical conditions), age, disability, genetic information, citizenship status, veteran status, gender identity/ expression, sexual orientation, domestic violence victim status, mental or family status, or any other status protected under applicable federal, state and local laws. TechForm's commitment to providing equal employment opportunities extends to all aspects of employment, including job assignment, compensation, discipline, and access to benefits and training.

Health and Safety

We find it essential to provide our team members with a safe working environment. To keep safety and security at the forefront of our daily operations, our Safety Committee meets regularly to identify new safety concerns, discuss solutions, and provide recurring training to our employees. A fully accessible safety manual outlines policies and procedures to keep employees safe and healthy. Safety Data Sheets (SDS) are available for all employees with a complete listing of all hazardous materials on-site. Our employees are trained in the proper procedures for working with hazardous substances and are provided with any safety equipment needed for their protection. We comply with all OSHA laws and regulations and invite them into our facility to audit our processes to ensure we are utilizing the safest practices.

Training and Development

Our commitment to giving our team members the tools they need to be successful continues with our Education Policy. This program entails educational opportunities, such as online courses, admission to industry conferences, and cross-training for team members to advance professional development.

Additional training is provided for specific employees, management, or job tasks to satisfy RJC and ISO certification requirements. Many of the most critical compliance and safety training sessions are repeated on a defined schedule to ensure retention.

Each employee is reviewed on a schedule that provides performance feedback, an opportunity for wage increases, and advancement in the company. That schedule is defined based on job role but generally includes a 30-day, 60-day, 90-day, and 6-month onboarding progress review as well as an ongoing annual review.

Health and Retirement Benefits

We believe that being responsible corporate citizens starts with taking care of our team members. We offer a competitive benefits package to all full-time and part-time employees that includes premium medical and dental coverage and a retirement plan with an employer-match benefit.

TechForm provides paid time off (PTO) to full-time and part-time employees who can use the time for personal needs such as vacation, illness, doctor's appointments, or other personal reasons. TechForm's PTO policy is designed to give employees the needed time off for both unexpected illnesses and vacations. TechForm employees also receive seven paid holidays a year during which our facility is closed.

Diversity and Respect

TechForm commits to fostering an environment that is free from disrespect, disruptive behavior, bullying, harassment, and violence in the workplace.

TechForm will not tolerate this conduct from any employee (including management), vendor, customer, or visitor. We believe everyone should be provided with basic human rights in our company and throughout our supply chain.

Anti-Discrimination/Anti-Harassment

TechForm is committed to providing a work environment that is free of discrimination and harassment. TechForm disapproves of and strictly prohibits comments or actions by anyone that may create an offensive or hostile work environment for any employee because of the employee's race, color, religion, age, sex, gender identity and expression, sexuality, marital status, national origin, disability, ancestry, or medical condition. This policy extends not only to prohibiting unwelcome sexual advances and offensive sexual jokes, innuendos, or behaviors, but also prohibits offensive conduct related to or based upon factors other than sex.

Preventing Retaliation

No retaliation will be permitted against an employee who registers a complaint or reports a harassment incident, or against any employee who provides testimony as a witness or who otherwise assists any complaining or reporting employee, or who assists TechForm in connection with the investigation of any complaint or report.

TechForm strives to be responsive to our employees' concerns. We understand that problems, misunderstandings, and frustrations may arise from time to time. Therefore, we encourage open communication. Any concerns employees have should be promptly reported to management so that a solution may be devised. An Open-Door Policy encourages employees to come forward with any concerns or complaints at any time without fear of discipline or retaliation. We also utilize an anonymous reporting channel where our employees have the option to remain unidentified when confronting management, and those who wish to remain anonymous when filing a complaint or grievance.

Workplace Violence

The following are prohibited and will not be tolerated of any employee on TechForm premises or while on TechForm business:

- Any direct or indirect harassing, intimidating, abusive or threatening language, actions, or behavior.
- Any direct or indirect plan, threat, or act of violence, causing property damage, injury, or death (including, but not limited to fistfights, wrestling, or other forms of physical fighting with or without weapons).
- Possession, use or display of a weapon on company premises or while on company business.

Any employee violating this policy will be subject to disciplinary action, up to and

including termination of employment.

Community Engagement and Philanthropy

We believe that every company should contribute and give back to the community that has provided their business with the platform and opportunity to grow and prosper. TechForm gives back to the community by sharing research and reports with the jewelry industry by releasing technical research papers. These publications detail breakthroughs we have discovered while refining our casting processes. Our research and subsequent publications of results have helped many manufacturers and small business owners to improve their casting processes and finished products. In addition, TechForm's founding and support of the Portland Jewelry Symposium over 14 years gave back to the jewelry industry through education on a whole range of topics, from technical to business to artistic.

We have purposely kept a low profile within the local community for security reasons, prioritizing the safety of our employees. Our founder and owner until 2022, Teresa Frye, channeled nearly all charitable donations through her own personal taxes. Meaningful among those in our industry, support has gone to Mercury Free Mining and Gem Legacy, both of whom get annual donations. Teresa has also volunteered as a Board Member for JBT and MJSA as well as an Editorial Board Member for Johnson Matthey Technology Review.

With the sale of the company in 2022, as Teresa is no longer the sole owner, we can re-evaluate how we give as a company. We have supported Women's Jewelry Association, WJA, through membership and donations to the general education fund. We have consistently donated to the Jewelers for Children auction through the American Gem Society. As part of our continual commitment to improve as a company, we will look for future opportunities to help our jewelry community.

Supply Chain Responsibility

Responsible Sourcing

TechForm views suppliers as essential stakeholders whose business practices must align with our company's values to foster a lasting relationship. We have meticulously vetted each of our precious metal suppliers to ensure they are committed to sustainable business practices consistent with our environmental and social values and hold to a firm human rights policy.

Our precious metals suppliers maintain certifications from respected third-party organizations and associations, including ISO 14001, LBMA Responsible Sourcing program certification, SCS Global Services Responsible Source Refiner Certification, and the Responsible Jewelry Council. These standards aim to promote sustainable supply chains through responsible mining practices, conflict-free sourcing, adherence to human rights and the implementation of responsible

business practices.

Precious Metal Suppliers

We recognize that the production of platinum group metals is a very labor-intensive process that consumes large amounts of electricity, water, and chemical components. Our first choice is always recycled metal over directly mined metal. The large majority of our metal is provided by Umicore Precious Metals USA Inc., which supplies us with recycled 950 platinum ruthenium and fine gold casting grain. These alloys are derived from consumer and industrial recycled products. When recycled platinum is unavailable, Umicore provides mined metal that complies with the LPPM's Responsible Sourcing Guidance for Pt & Pd. Internally, we track in which molds any mined metal is used in order to eliminate the possibility of using mined material on products we state are from a recycled source. If needed, we can report to our customers whether their casting contained 100% recycled or a portion of mined metal. The fine gold casting grain that Umicore provides us is always 100% recycled, and they provide confirmation of this certification quarterly.

TechForm ensures that any gold or precious metal purchased comes from a company that takes supply chain and environmental responsibility seriously and is transparent in its compliance. We buy our other alloys from Hoover and Strong or Stuller, Inc. Both companies are known industry-wide for their commitment to sustainably sourced metal, with multiple certifications and a strong Code of Conduct. *See Appendix B for a full list of TechForm's metal suppliers and the suppliers' certifications.*

Money Laundering and Terrorism

Working in the precious metals industry exposes different risks to each member of the supply chain. Due to the high value, compact size, and weight of precious metals, the industry is an attractive target for illegal enterprises to launder criminal proceeds or finance terrorism undetected. TechForm believes that everyone in the supply chain is responsible for combating illegal activity and minimizing risks.

TechForm established an Anti-Money Laundering and Anti-Terrorist Financing Program developed under the regulations set out in the International Money Laundering Abatement and Anti-Terrorist Financing Act of 2001 with guidance from JVC Legal. This program is regularly reviewed and updated in conjunction with changes in federal regulations and is audited annually. Our employees are trained in detecting suspicious activity, and TechForm has protocols in place to report such activity to the Financial Intelligence Unit (FIU). This policy applies to all customers and suppliers.

Implementation and Communication

To effectively implement this policy, all employees will be provided with training

and resources to understand their roles and responsibilities and all policies are available on our website for review. In conjunction with our yearly ISO and RJC audits, we will review and evaluate our CSR initiatives to ensure their effectiveness and make necessary improvements. This policy will be communicated to all stakeholders, including employees, suppliers, and customers, through our website, internal communications channels, and other appropriate means.

Building a Sustainable Legacy

Caring for our planet and contributing to social good is deeply ingrained in TechForm's company culture. TechForm was founded on an ethos of Continuous Improvement. This process is ingrained throughout the company as we work to improve practices and processes and lessen any negative impacts our business decisions have on our environment and community. The creation of our Corporate Social Responsibility Policy has uncovered future opportunities within our community of employees, customers, and suppliers. We envision this program will continue to evolve to represent how we recognize and contribute to improving social good and building a sustainable legacy.

Approval

This policy has been approved and endorsed by Sarah Loveland, President. Any questions or concerns regarding this policy should be directed to Sarah Loveland for resolution. Effective Date: 5/20/2025

Any concerns with this document or any TechForm activity can be addressed by emailing the management team at info@techformcasting.com

Appendix

Appendix A: Responsible Sourcing Policy

TechForm acknowledges the risks associated with purchasing metals extracted, traded, handled, and exported from conflict-affected and high-risk areas. We also acknowledge that we are responsible for respecting human rights and not contributing to conflict and global rights violations. This Responsible Sourcing Policy has been created to ensure that all precious metals TechForm sources originate from suppliers that ensure their business practices are in line with the Office for Economic Development's Due Diligence Guidance for Responsible Supply Chains as well as the London Platinum and Palladium Market's Responsible Platinum and Palladium Guidance.

We are committed to ensuring that our business decisions do not contribute to the financing of conflicts, human rights abuses, money laundering, or the funding of terrorism. Therefore, we require that our metal vendors fully comply with all United Nations sanctions resolutions and local laws related to the extraction, transportation, and trade of minerals. At TechForm, we believe that transparency and integrity in our supply chain are paramount to our business and the entire jewelry industry. The following standards summarize our commitment.

TechForm will not associate with any company directly or indirectly doing business with the parties involved.

- Any form of forced or compulsory labor,
- Any form of torture, cruel, inhumane and degrading treatment,
- Any form of child labor
- War crimes, crimes against humanity, or genocide.

TechForm will periodically perform investigations and other due diligence audits on our suppliers to ensure compliance. If risks are uncovered regarding a current supplier, we will take the necessary steps to address and influence change, acting efficiently and respectfully. If suppliers are unable to improve their practices, we will take measures up to and including suspension of the business relationship.

TechForm will not accept any direct or indirect support by our suppliers for non-state armed groups or private security forces who:

- Illegally control mining sites, traders, other intermediaries, or transport routes, and/or
- Illegally tax or extort money or minerals.

TechForm will not do business with any organization that is involved in bribery, corruption, or financial crime. It is our duty to provide transparency and integrity in

our supply chain; therefore, TechForm will only source precious metals from trading companies, refiners, smelters, and alloy suppliers who can satisfy one of the following objectives:

- Current SCS Global Services Responsible Source Refiner Certification,
- Responsible Jewelry Council Membership Certification,
- London Bullion Market Association (LBMA) certification
- LBMA Responsible Sourcing Program Certification,
- Listed on the LBMA and/or LPPM Good Delivery List.

Appendix B: Anti-Bribery and Corruption Policy

TechForm Advanced Casting LLC (the "Company") is a highly respected and recognizable organization. We have earned and maintained this reputation among competitors and consumers through our commitment to conducting business according to moral, ethical, and legal standards. The Company does not allow or tolerate any bribery and corruption.

This Anti-Bribery and Corruption Policy (the "Policy") discourages and prohibits any bribe or corrupt practice with any stakeholder, including offering, promising, or providing any means or value to any stakeholder, including a customer, government official, business partner, or a third party, to induce any improper action in relation to our business.

Objective

This Policy outlines the Company's moral and legal responsibility to counter bribery and corruption and provides tools and methods to ensure a check and balance on such practices.

Corruption

For the purpose of this Policy, a bribery offense includes bribes, kickbacks, and extortions, either active or passive, of any kind.

Penalty

If any Company employee is found violating this Policy, they can face termination as well as disciplinary proceedings that may result in severe civil and criminal penalties.

Scope

This Policy applies to all employees, directors, officers, and any third party directly engaged with our business. It also applies to any subsidiary, branch office, or liaison office of the Company, regardless of location.

Applicable Laws

This Policy is governed by the anti-corruption and anti-bribery laws of the United States and the *Foreign Corrupt Practices Act*.

Prohibition of Bribery

The company employees are prohibited from offering, promising, or sanctioning any kind of payment to government officials to secure improper business advantage or influence bureaucratic work.

The Company prohibits employees from taking any ill gain or advantage through improper means from any private entities.

Employees are strictly advised to obtain approval from the Company before advancing any valuable item to any government official or private entity. Provision of any travel, gifts, cash, or meals to any government official or any person in exchange for any ill gain is prohibited.

Donations used for unfair gain or to influence any person are strictly prohibited. The Company will sanction any charitable gesture or donation not approved through the proper procedure.

Sometimes, funds must be appropriated to promote or demonstrate Company products or services, but they must not be used to influence the normal functioning of any government official or private entity. Before appropriating such funds, approval from the president or owner is necessary.

It is strictly prohibited to employ any government official, employee of a private entity, or their relatives to influence or gain an undue benefit. If such employment is necessary, prior approval from the Company's legal counsel is required. Political contributions advanced to influence government officials are strictly prohibited. All political contributions will go through the proper channel outlined in a separate policy.

Third parties directly associated with the Company are strictly prohibited from engaging in any corrupt practice on behalf of the Company. All payments to third parties in exchange for their services and contributions to the Company must be recorded appropriately and evidenced. Additionally, third parties interacting with a government official on behalf of the Company must be documented. All third parties are obligated to do due diligence before engaging with government officials on behalf of the Company.

The company may conduct periodic audits to ensure compliance with this Policy. All employees, directors, officers, and stakeholders must cooperate with the audit process.

All directors, officers, employees, and stakeholders must report any violation of this Policy to the Company's legal team. Failure to report such an incident constitutes a violation and can lead to disciplinary action.

The Policy shall come into effect on 05/08/2025.