Business Ethics Policy

1 Introduction

1.1 Purpose

Precision Concepts International (PCI) and its subsidiaries (collectively, “PCI”) strive to maintain a working environment, both internally and through our suppliers, that conducts its personnel practices in line with the highest level of integrity and appropriate transparency. PCI operates in accordance with applicable laws and regulations and PCI’s Code of Conduct. We recognize the importance of aligning our business practices with principles that not only comply with regulations but also transcend these standards to contribute positively to the well-being and further development of our workforce and communities.

In this policy, we outline our objectives and set forth the measures we are undertaking to ensure the promotion of responsible ethical practices and standards within our organization. It covers all forms of corruption, such as bribery, conflict of interest, fraud, and money laundering, as well as anticompetitive practices. It is a roadmap guiding all stakeholders—employees, suppliers, contractors, and our extended community—toward shared values and a collective commitment to ethical business practices. This policy is informed by relevant internal and external expertise; is publicly available, and communicated internally and externally to all personnel, business partners and other relevant parties; and is reflected in operational procedures necessary to embed it throughout the business enterprise.

1.2 Material and Legal Scope

This policy applies to PCI’s employees, agents, contractors, and sub-contractors in whatever capacity we employ them, regardless of the activities they conduct. This includes all our operational sites and locations where we conduct business activities. PCI will strive to ensure that its suppliers and business partners also adhere to the standards that are outlined within this policy.

1.3 Definitions

This section intends to describe the different terminology that will be employed throughout this Policy, including examples.

Anti-Competitive Practices

Anti-competitive practices refer to actions or strategies employed by businesses or entities in a market that undermine competition and hinder the normal functioning of a competitive market. An example would be a group of companies colluding to fix prices, restricting fair competition in the market.

Bribery

Bribery is offering, giving, receiving, or soliciting any item of value to influence the actions of an official or other person in charge. Essentially, it is offering to do something for someone for the expressed or implied purpose of receiving something in exchange. An example of bribery is a company executive offering gifts to a government official to secure a favorable contract.

Corruption
Corruption refers to the abuse of power to obtain private gains, such as monetary and/or other material gains. Corruption undermines the principles of fairness, integrity, and transparency. For instance, a compliance officer exploiting their position to influence chemical regulations for personal gain would be considered a corrupt act.

Fraud
Fraud is an intentional deception or misrepresentation made by an individual or entity with the aim of gaining an unfair or dishonest advantage, typically for financial gain or to cause harm to others. It involves misleading others through false information, concealment of facts, or manipulation of circumstances. For example, this includes making false statements, either verbally or in writing, with the intention to deceive. This can include providing false information on financial statements, contracts, or other documents.

Money Laundering
Money laundering is the process of disguising the origins of illegally obtained funds, typically by passing them through a complex sequence of banking transfers or commercial transactions. The goal is to make the money appear legitimate and to integrate it into the legal financial system, making it difficult for authorities to trace and identify the illicit source. Money laundering is often associated with various criminal activities, such as drug trafficking, corruption, and terrorism financing. For instance, this could be about cleaning what is coined as ‘dirty money’ by legitimizing the money gained from illegal benefits.

Conflict of interest
Any activity or interest which is, or potentially is, inconsistent with or opposed to the legitimate and best interest of the Company. Simply stated, a conflict of interest occurs whenever an employee permits the prospect of direct or indirect personal gain to influence his or her judgment or action in the conduct of the business of the Company.

1.4 Roles and Responsibilities

To ensure the effective implementation of this policy, PCI has assigned the following roles and responsibilities in the table below. These will ensure that all objectives and measures described in this policy are achieved to the best of our ability.

Role	Responsibilities
Employees	Responsible for reading the following policy, acting in accordance with this policy, and reporting any (possible) breaches immediately.
Management	Responsible for communicating applicable measures throughout the company and providing the means to support their implementation. Management is also responsible for approving the contents herein. In addition, management will select a policy owner for each policy.
Policy Owner	Responsible for the implementation and monitoring of the policy. The contact officer must review and update the policy on an annual basis and respond to all requests and inquiries. Name/Function: Mary Connery, VP of Human Resources Contact details: mconnery@pcinternational.com

2 Bribery and Corruption

PCI condemns any attempts of bribery and/or corruption. Corrupt behavior and instances of bribery are neither fair nor sustainable and are not in the best interest of PCI as a company, nor for its staff and affiliates. We commit to combating these issues with a zero-tolerance policy towards instances of bribery and corruption.

2.1 Objectives

To prevent potential occurrences of corruption and bribery, PCI will:

- Comply with all relevant laws and regulations regarding corruption and bribery in all geographies where we are present.
- Maintain 0 legal instances of corruption and bribery.
- Conduct annual risk assessments that look for corruption and bribery throughout PCI's operations review the process and analyze data on 2-year cycles: next in 2027
- Re-train 95% of our workforce on business ethics training on the topic of corruption and bribery by 2028.
- Investigate 100% of corruption cases reported through our whistleblowing procedure.
- Have mechanisms in place to remediate any complaint made regarding corruption practices review process next in 2028.
- Conduct annual supplier risk assessment covering corruption and bribery topics, review an analyze next in 2028.
- Ensure 100% of employees receive and acknowledge the Employee Code of Conduct

2.2 Measures

Specific measures regarding working corruption and bribery are outlined in detail below:

- We use our whistleblower procedure / complaints mechanism in place for the topics of corruption and bribery, accepting complaints from internal and external stakeholders (See Section 6).
- We share specific guidelines with our employees regarding accepting gifts and hospitality, donations, sponsorship, or interactions with public officials, from internal and external stakeholders.

3 Conflicts of Interest

PCI requires employees to avoid and disclose all ethical, legal, financial, or other conflicts of interest involving the Company, and remove themselves from the position of decision-making authority with respect to any conflict situation that may affect PCI. No employee shall engage in any activity or maintain any business relationship that may bias his or her judgment or otherwise influence his or her activities or conduct to the detriment of PCI. Employees shall avoid personal transactions or situations in which their personal interests will, or even appear to, conflict or interfere with those of the Company. Employees shall not use their positions or the knowledge gained in their positions in any manner which interferes with or compromises the best interest of PCI, particularly for the personal gain of the employee.

3.1 Objectives

To avoid any conflict of interest whatsoever, we have formulated the following objectives:

- Ensure that all employees and related third parties of PCI always act in the best interest of the company and its business and refrain from any conflicts of interest.
- Comply with all relevant laws and regulations regarding conflict of interest in all geographies where we are present.
- Maintain 0 legal instances of conflicts of interest.
- Investigate 100% of cases related to conflicts of interest reported through our complaints mechanism.
- Have mechanisms in place to remediate any complaint made regarding conflicts of interest follow up review and analysis by YE 2028.

3.2 Measures

- We use the complaints mechanism in place for the topics of conflicts of interest, accepting complaints from internal and external stakeholders (See Section 6).
- We ensure all activities are sustainable and are in a form that is transparent, clear, ethical, and not misleading or untrue.

4 Fraud and Money Laundering

PCI is committed to acting lawfully and with integrity in all of our operations. As such, we are dedicated to raising awareness and preventing any case of fraud and/or money laundering from occurring in our operations.

4.1 Objectives

We are committed to the following objectives to ensure fraud or money laundering practices are not present in our operations and those of our direct affiliates:

- Consistently comply with all national legislation and international norms regarding fraud and money laundering in all geographies where we are present.
- Maintain 0 legal instances of fraud and money laundering yearly.
- Review mechanisms in place to remediate any complaint made regarding fraud by 2027.
- Conduct annual supplier risk assessment covering fraud and money laundering topics, on a 3-year cycle next due in: 2028.

4.2 Measures

- We protect business in relation to fraudulent acts from its employees and/or third parties involved.
- We prohibit any form of money laundering or terrorism financing.
- We use the complaints mechanism in place for the topics of fraud and money laundering, accepting complaints from internal and external stakeholders (see section 6).
- We ensure all our activities are sustainable and are in a form that is transparent, clear, ethical and not misleading or untrue.

5 Anti-Competitive Practices

We aim for fair competition and work to maintain good relationships with competitors, consumers, and market regulators. Our managers, employees, and affiliates are expected to not engage in anti-competitive practices such as price-fixing, cartels, dumping, and patent abuse, among others.

5.1 Objectives

To ensure fair competition in the market, PCI will:

- Maintain 0 cases of anti-competitive practices yearly.
- Prohibit all employees, officers and directors from collaborating with competitors to restrain competition or trade or engaging in any of the anti-competitive practices outlined in the definition found in Section 1.3.
- Conduct annual anti-competitive practices risk assessment, next due by 2027.
- Ensure that all employees, officers, and directors deal honestly, ethically, and fairly with the company's salespersons, customers, competitors, and other employees.
- Strive to compete in the market fairly and never through unethical business practices.
- Have mechanisms in place to remediate any complaint made regarding anti-competitive practices follow up review and analysis by YE 2028.

5.2 Measures

- We comply with all applicable laws and regulations on anti-competitive practices in every geography where PCI operates.
- We adhere to sector and industry trends, as well as best practices.
- We provide competitor interaction guidelines to our employees through our Employee Handbook
- We use the complaints mechanism in place for the topic of anti-competitive practices, including complaints from internal and external stakeholders (See Section 6).

6 Complaints Mechanism

6.1 Reporting Internally (Problem Solving Procedure)

PCI encourages anyone who sees something that might be in breach of this policy to report it, aligned with our Problem-Solving Procedure. Feel free to speak with your manager, Human Resources, or a manager of PCI if you witness or suspect any breach of this policy. The issue should first be discussed with the employee's supervisor or those directly involved in the matter. If the matter cannot be resolved:

- A meeting with the department manager or department director should be requested.
- If the matter remains unresolved, a meeting should be requested with Human Resources.

Any individual who believes they have encountered or witnessed a breach of this policy is strongly encouraged to report such concerns. We will ensure that no reporter faces retaliation or any adverse consequences for reporting a breach. We are committed to thoroughly investigating such reports and taking appropriate actions to address any confirmed violations.

In the case of any incident witnessed which may result in immediate incident, do not wait to start a formal reporting process. Instead, the witness should go directly to the person managing the activities or a senior staff member on shift to address the situation promptly. Determining what constitutes an emergency should be based on best judgment.

6.2 Reporting Externally (Whistleblower Hotline)

We encourage individuals to follow our Problem-Solving Procedure for concerns that can be dealt with in-house. However, should any individual need to make a report securely and confidentially, external reporting can also be undertaken using our External Hotline.

- **Subject Matter**: Anyone who believes that they have witnessed or experienced a violation of PCI's policies or suspects fraudulent behavior by an employee (at any level of the organization), supplier or contractor, can report it via the External Hotline. This can be done anonymously if the caller requests.
- **Reporting Procedures**: Calls can be made from any location at any time. Callers can choose to give their name or remain anonymous if they wish. All calls are documented and reported back to management, as appropriate.
- **Investigation Procedures**: Management will initiate an investigation into the matter and ensure proper resolution to the matter. If the reporter has not expressed the desire to remain anonymous, PCI will ensure that they remain informed about the process and outcome.
- **No Retaliation**: No officer, affiliate or employee of the company who in good faith reports a breach or wrongdoing will suffer harassment, retaliation, discipline or adverse employment consequence.

Reporting is available 24/7 and can be made via these channels:

By Phone: 855-400-6002; for Spanish - 800-216-1288
By email: standard-reports@mitratech.com
or go to: https://report.syntrio.com/pcinternational

Confidentiality will be maintained to the extent practical and permitted by law. Investigations will be conducted as confidentially as possible and related information will only be shared with others on a need-to-know basis. The investigation will be completed, and a determination made and communicated to the reporter as soon as practical.

6.3 Remediation Process

In accordance with the OECD Due Diligence Guidance for Responsible Business Conduct, PCI commits to providing or cooperating in remediation procedures where appropriate.

Some key elements of the remediation process through the lens of OECD include the following actions:

- Remedial Actions: If the investigation confirms wrongdoing, appropriate remedial actions will be taken. This may include disciplinary measures, corrective actions, and changes to policies or procedures to prevent future occurrences.
- Remedy to Victims: Should the wrongdoing reported result in damages to an individual, PCI will promptly address the situation by providing appropriate remedies. The type of remedy offered will

depend on the nature and severity of the breach, ensuring fair and supportive measures are implemented to resolve the issue and support those affected.

- Reporting to Authorities: In cases where the wrongdoing may involve violations of laws or regulations, the findings may be reported to relevant authorities in compliance with legal obligations.
- Documenting and Reporting: The remediation process will be thoroughly documented, including investigation reports, actions taken, and outcomes. Relevant stakeholders, including company leadership, will be provided with regular updates on the company's efforts to address the reported concerns.

The ethics remediation process will follow all local laws and regulations. Impacts to the business operation will be addressed through outside counsel at the discretion of the VP of HR.

7 Policy Review, Sanctions & Approval

7.1 Policy Review

To ensure the continued validity and accuracy of this policy, an annual review will be carried out by the Policy Owner listed in Section 1.4 of this document. The review intends to identify any need for an update and make any necessary changes. The objectives and measures should be revised closely as these will almost certainly change periodically. If significant changes occur in PCI's operations, then a more frequent review of this document is advised.

7.2 Sanctions

All PCI members and affiliates are responsible for following this policy and applying it to their daily work. Further, managers are responsible for monitoring and ensuring that the personnel under their supervision follow this procedure. In the event of non-compliance with this policy, PCI reserves the right to corrective action against the perpetrator. In some instances, non-compliance may lead to relationship termination.

7.3 Approvals of the Latest Version of this Document

Revision	Date	Description / Summary of Changes	Author
000	09/01/2024	Initial Release	Harner, A HR OPS
001	08/29/2025	Goals and Targets to 2030 Goals	Jones, Carren HR OPS
002	08/01/2026	Changed branding and all instances of "Comar" to "PCI"	Mikayla Simphaly Quality & Regulatory Engineer

With the Acknowledgement and Approval of:

ELECTRONICALLY AUTHORIZED	DATE:	9/24/2026
Mary Connery, VP of Human Resources	LOCATION:	Corporate

Next Review: 08/01/2027