



Min-E-Con LLC Policy on Supply Chain Transparency on Modern/Anti-Slavery, Human Trafficking and Global Anti-Bribery/Anti-Corruption

1. Modern/Anti-Slavery & Human Trafficking

Min-E-Con LLC is fully committed in taking all necessary steps to ensure that our company policies and working practices revolve around a work environment and supply chain that is free from human trafficking and slavery consistent to the obligations under the Modern Slavery Act 2015 and California Transparency in Supply Chains Act of 2010. Our statement is made pursuant to the obligations under the Modern Slavery Act 2015, California Transparency in Supply Chains Act of 2010 and constitutes our slavery and human trafficking statement will be maintained annually.

Min-E-Con LLC maintains high standards of ethical conduct and ensures fair treatment to all our employees, supply chain and customers. Min-E-Con LLC is committed in providing a safe work environment that ensures the safety and well-being of all employees, suppliers and customers. Min-E-Con LLC expects that our employees, supply chain and customers uphold our values and comply with our principles that prohibit forced labor, slavery and human trafficking

Min-E-Con LLC is judged by the collective and individual performance of its officers and employees. Min-E-Con LLC has specific interests in preserving its reputation and the reputation of its employees for the utmost honesty and integrity. Thus, Min-E-Con LLC holds itself and its employees to the highest standards of lawful and ethical conduct

Min-E-Con LLC will not tolerate or condone human trafficking or slavery in any part of our global business with our employees, suppliers and customers. Our commitment will treat people with dignity and respect and protect human rights prohibiting slavery and human trafficking.

Min-E-Con LLC Policy against Trafficking in Persons and Slavery is consistent with Min-E-Con LLC's Code of Ethics and Business Conduct with our core values to protect and advance human dignity and human rights in our global business practices and supply chains.

Min-E-Con LLC Modern Slavery Statement, our policy against Trafficking in Persons and Slavery, our policy statement contained therein, supporting documentation and arrangements will be reviewed and amended as necessary and in the event of any significant changes to the legislation.

Min-E-Con LLC will periodically review the effectiveness throughout their organization to ensure there is no slavery or human trafficking in their supply chains. As part of our company's commitment, we expect all employees, our supply chain and customers to support and uphold the measures below to safeguard against modern slavery and human trafficking:

- Min-E-Con LLC will regularly audit suppliers to evaluate compliance with company standards, as company standards are consistent with applicable law.
- Min-E-Con LLC requires vendors to certify compliance, through purchase order acceptance, with applicable laws relating to human trafficking and slavery as they relate to the materials supplied.
- Min-E-Con LLC maintains internal accountability standards and procedures for employees and suppliers failing to meet company policies, which include those relating to human trafficking and slavery.
- Min-E-Con LLC requires employees and managers to comply with applicable laws relating to human trafficking and slavery.
- Min-E-Con LLC has a zero-tolerance to modern slavery and human trafficking. We will prevent, detect and report any case of modern slavery within the Company and our supply chain.
- Min-E-Con LLC will take the necessary action once aware of any individual regardless of employee, supply chain or customer, working on our behalf that has breached our policy. No one must engage in, facilitate or fail to report any activity that might lead or suggest a breach of our policy.
- Min-E-Con LLC will ensure a level of understanding of the risks of modern slavery and human trafficking in our business and supply chains. Our employees receive our handbook which defines the Business Ethics and Code of Conduct procedures.
- To report without fear of retaliation of any activity inconsistent with our policy, employees may contact the Global Human Trafficking Hotline at 1-844-888-3733 or email help@befree.org.
- FAR 52.222-50 Combating Trafficking in Persons

2. Anti-Bribery/Corruption

Min-E-Con LLC will comply with the laws and regulations prohibiting bribery and other related forms of corruption. Min-E-Con LLC's reputation is built on values as a company and values of our employees. Min-E-Con LLC expects their employees, supply chain and customers, behave in a professional manner that is consistent with anti-bribery and corruptions laws in all countries in which we do business with.

Min-E-Con LLC will conduct business in an honest, ethical manner and act fairly with integrity in all our business dealings and relationships wherever we operate by implementing and enforcing systems to counter bribery. We take a zero-tolerance approach to bribery and corruption. Min-E-Con LLC expects that those we do business with take a similar zero-tolerance approach to bribery and corruption.

Min-E-Con LLC anti-bribery and corruption policy applies to all officers, members, employees (whether temporary, fixed-term, or permanent) , suppliers, distributors, sales representatives, or any other person or persons associated with us (including third parties), no matter where they are located.

- Third-party refers to any individual or organization our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, government and public officials which also includes their representatives and officials, politicians, and public parties.
- Any arrangements that Min-E-Con LLC makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Bribery is considered an offering, promising, giving, accepting or soliciting of an advantage which is illegal or breach of trust. A bribe is a persuasion or to influence someone, to promise or provide a reward in order to gain any commercial, contractual, regulatory or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery and corruption are subject to criminal and civil penalties in many countries, including the United States. Min-E-Con LLC takes our legal responsibilities seriously and will expect everyone working within or for the business to do the same.

- Min-E-Con LLC employees must not engage in any form of bribery, either directly or indirectly through any third party, such as a supplier, distributor, sales representative or customer and they must not bribe a foreign official, public or government official domestically or globally. Refer to Min-E-Con LLC Employee Handbook, page 40-41.
- Min-E-Con LLC prohibits directly or indirectly donations, whether in cash or kind, in support of any political parties or candidates as this can be perceived as an attempt to gain an improper business advantage. This applies to all Min-E-Con LLC employees, officers or directors or any other person acting on behalf of Min-E-Con LLC.
- Min-E-Con LLC will not make any donations, whether in cash, kind, or by any other means, to support any political parties or candidates.
- All employees must inform their supervisor or manager immediately if offered a bribe by anyone or asked to make one and if suspected they may be bribed, asked to make a bribe in the near future and have reason to believe they are a victim of another corrupt activity.

3. Employee Responsibilities and Protection

As an employee of Min-E-Con LLC , you must ensure that you read, understand, and comply with our handbook and the information contained within this policy, and with any training or other anti-bribery and corruption information you are given. All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. Employees are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If any employee has reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches our policy, the employee must notify their supervisor or manager at once. If an employee is uncertain about whether a certain action or behavior can be considered bribery or corruption, please discuss with the supervisor or manager.

Any employee that breaches our policy will face disciplinary action and could face dismissal for gross misconduct. Min-E-Con LLC has the right to terminate a contractual relationship with an employee if they breach our anti-bribery policy.

Min-E-Con LLC understands that an employee may feel worried about any potential repercussions if they refuse to accept or offer a bribe or report a concern relating to any type of act(s).

Min-E-Con LLC will support any employee(s) who has any concerns in good faith under our policy, even if investigation finds that they were mistaken.

Min-E-Con LLC will ensure to their employee(s) that no one will suffer any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or that they report a concern relating to potential act(s) of bribery or corruptions.

- Detrimental treatment will be referred to dismissal, disciplinary action, treats, or unfavorable treatment in relation to the concern the employee(s) raised.

Any employee(s) that has reason to believe they've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, they should inform their supervisor or manager immediately.

4. Training and Communication

Min-E-Con LLC anti-slavery, human trafficking, bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all employees, suppliers, distributors, customers and third parties at the outset of business relations, and as appropriate thereafter.

Min-E-Con LLC will provide relevant anti-bribery and corruption training to employees where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced.

Min-E-Con LLC will monitor the effectiveness and review the implementation of their policy. Any improvements identified to our policy will be implemented immediately. Our employee(s) are encouraged to offer their feedback on any policy if they have any suggestions for how it may be improved. Employee(s) feedback of this nature should be addressed to their supervisor or manager.

Min-E-Con LLC policy does not form part of an employee(s) contract of employment and Min-E-Con may amend at any time to improve its effectiveness to combat anti-slavery, human trafficking, bribery and corruption.

5. Books, Records and Accounting

Min-E-Con LLC will maintain books and accurate financial records that reflect all transactions in reasonable detail. Our records are proprietary and apply to all payments, not merely those that would be material in the traditional financial sense. Min-E-Con LLC will have appropriate internal controls in place to act as evidence for all payments made. Min-E-Con LLC will declare and keep written record of the amount and reason for hospitality or gifts accepted and given, and we'll understand that gifts and/or acts of hospitality are subject to managerial review. No undisclosed or unrecorded accounts may be maintained for any purpose.

6. Gifts and Hospitality acceptable and non-acceptable

Min-E-Con LLC prohibits the appearance of impropriety in the acceptance of gifts from business contacts or clients. It is the express policy of

Min-E-Con LLC that employees are prohibited from, either directly or indirectly, asking, demanding, exacting, soliciting, or seeking, anything of value of oneself or for any other person or entity.

Min-E-Con LLC will consider acceptable as normal and appropriate gestures of gifts, hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favors or benefits.
- b. It is not made with the suggestion that a return favor is expected and that it is given/received openly, not secretly or selectively given to a key, influential person, clearly with the intention of directly influencing them.
- c. It complies with local laws.
- d. It is given in the name of the company, not in an individual's name.

- e. It is not above a certain excessive value, as pre-determined by the company's policy a value of \$50.00 US dollars or more.
- f. It is appropriate for certain circumstances (e.g. giving small gifts around Christmas or as a small thank you).
- g. It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager.

Employees must adhere to Min-E-Con LLC's policy of any gifts given and/or received and always be disclosed to their supervisor or manager at once.

7. Facilitation Payments and Kickbacks

Min-E-Con LLC prohibits any form of facilitation payments of any nature. We recognize that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We also recognize that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

Min-E-Con LLC prohibits any type of kickbacks to be made or accepted. We recognize that kickbacks are typically made in exchange for a business favor or advantage.

Min-E-Con LLC also recognizes that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- Keep any amount to the minimum, ask for a receipt, detailing the amount and reason for the payment.
- Create a record concerning the payment.
- Report this incident to your supervisor or manager at once.

8. Supply Chain

Min-E-Con LLC verifies product supply chains based on several methods as supplier certification of compliance, inspections, verification of government debarments and site evaluations when necessary. All suppliers, being domestic or global, are to comply to their applicable local laws and they are required to comply with the laws and regulations of the United States.

9. Due Diligence

Min-E-Con LLC will conduct appropriate due diligence to inform risk assessments and ensure compliance with their policy. Records and documentation must be kept of due diligence as part of the system of internal controls and record keeping as noted in section 5.

10. Concluding Comments

Min-E-Con LLC's policy is to establish controls, to ensure compliance with all applicable and effectiveness regulations for modern/anti-slavery, human trafficking, bribery and corruption, and to ensure that Min-E-Con LLC's business is conducted in a socially responsible manner.

Our policy extends to all Min-E-Con LLC's business relationships in all countries and territories in which we operate. All persons covered in our policy are required to comply with the laws, rules and regulations and with respect to anti-slavery, human trafficking, bribery and corruption laws, rules and regulations.

Min-E-Con LLC's Board of Directors have overall responsibility for ensuring our policy complies with Min-E-Con's legal and ethical obligations, and that all those under Min-E-Con LLC's control comply and adhere.

All other Min-E-Con LLC business controls are stated in our Employee Handbook.