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OPERATING DIVISIONS
Springs Fabrication, LLC
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Anti-Bribery and Anti-Corruption Policy

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POLICY STATEMENT

Machine Build Technologies, LLC including its subsidiaries Springs Fabrication, LLC and Springs ATG, LLC (“MBT”) is committed to conducting business in an ethical and honest manner and to implementing and enforcing systems that ensure bribery and corruption is prevented. The company has zero-tolerance for bribery and corrupt activities. The company’s leadership and employees believe we have a civic and legal responsible to acting professionally, fairly, and with integrity in all business dealings and relationships.

MBT will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate.

MBT recognizes that bribery and corruption are both illegal and unethical, either of these activities could cause MBT serious damage to our reputation. We are committed to preventing bribery and corruption in our business and take our legal responsibilities seriously.

This policy is provided in conjunction with the ***MBT Code of Ethics and Business Conduct***.

1. WHO IS COVERED BY THE POLICY?

- a. This policy exists to set out the responsibilities of Machine Build Technologies, LLC and its subsidiaries Springs Fabrication, LLC and Springs ATG, LLC and those who work for us regarding observing and upholding our zero-tolerance position on bribery and corruption. The policy applies to all employees (whether temporary or full time), consultants, contractors, trainees, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located. The policy also applies to Officers, Trustees, Board, at any level.
- b. This Policy also exists to act as a source of information and guidance for those working for MBT. It helps employees recognize and deal with bribery and corruption issues, as well as understand their responsibilities.
- c. In the context of this policy, 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, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

- d. Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with at minimum.

2. DEFINITION OF BRIBERY AND CORRUPTION.

- a. Bribery and corruption refer to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.
- b. The act of bribery and corruption includes any inducement, reward, or object/item of value offered to another individual to gain commercial, contractual, regulatory, or personal advantage. Such act 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 in breach of this policy.
- c. Employees must not engage in any form of bribery or corruption, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's Human Resources manager.

3. WHAT IS AND IS NOT ACCEPTABLE?

- a. It is acceptable to receive normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:
- b. 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.
- c. It is not made with the suggestion that a return favor is expected.
- d. It is in compliance with local law.
- e. It is given in the name of the company, not in an individual's name.
- f. It does not include cash.
- g. It is appropriate for the circumstances (e.g., giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- h. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift (in excess of \$100.00).
- i. It is given/received openly, not secretly.
- j. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- k. As good practice, gifts given and received should always be disclosed to the Human Resources manager. Gifts from suppliers should always be disclosed.

1. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Human Resources manager should be sought.

4. FACILITATION PAYMENTS.

- a. MBT does not accept and will not make 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 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.
- b. MBT does not allow kickbacks to be made or accepted. We recognize that kickbacks are typically made in exchange for a business favor or advantage.

5. POLITICAL DONATION.

- a. MBT will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognize this may be perceived as an attempt to gain an improper business advantage.
- b. Nothing in this policy will prevent employees, shareholders, and other individuals affiliated with MBT from making personal donations for political causes so long as they are made within the spirit of this policy.

6. CHARITABLE CONTRIBUTIONS.

- a. MBT encourages the act of donating to charities whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.
- b. MBT will ensure that all charitable donations made are legal and ethical under local laws and practices and are not used to facilitate and conceal acts of bribery and corruption.

7. EMPLOYEE RESPONSIBILITY.

As an employee of MBT, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

- a. All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this policy.
- b. If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Human Resources manager.

- c. If any employee breaches this policy, they will face disciplinary action and could face termination for gross misconduct. MBT has the right to terminate any employee if they breach this anti-bribery and anti-corruption policy.

8. HOW TO COMMUNICATE A CONCERN?

- a. If you suspect that there is an instance of bribery or corrupt activities occurring in relation to MBT, you are encouraged to raise your concerns at as early a stage as possible. If you are uncertain about whether a certain action or behavior can be considered bribery or corruption, you should speak to your department manager, the Human Resources manager, the Plant Manager, or the company ownership.

9. TRAINING AND COMMUNICATION.

- a. MBT will provide training on this policy as part of the onboarding process for all new employees in addition to periodic training for existing employees.
- b. MBT will publish the policy on its corporate website to communicate zero-tolerance of corruption and bribery to customers, suppliers, contractors, business partners, and any related third- parties.

10. RECORD KEEPING.

- a. MBT will maintain detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made or received.
- b. MBT and its HR Department will maintain written records of any acts of bribery and corruption including reports of potential acts reported by employees, contractors, customers, suppliers, and other affiliated parties.

11. MONITORING AND REVIEWING.

- a. The company's management and accounting systems will maintain internal control systems and procedures designed to prevent bribery and corruption and may be subject audits to ensure that they are effective in practice.
- b. Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Human Resources manager.

12. AMENDMENT AND CONDITION OF EMPLOYMENT.

- a. This policy does not form part of an employee's condition of employment and MBT may amend it at any time to improve its effectiveness in response to changing civil, legal, and contractual requirements.