

MACHINE BUILD TECHNOLOGIES, LLC

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Human Rights Policy

OPERATING DIVISIONS

Springs Fabrication, LLC SpringsFab.com Springs ATG, LLC SpringsFabATG.com

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Machine Build Technologies, LLC, including its subsidiaries Springs Fabrication, LLC and Springs ATG, LLC ("MBT"), is committed to maintaining a culture of profound respect for individuals and human rights.

Human rights are fundamental liberties inherent to all people as outlined in the Universal Declaration for Human Rights, www.un.org/en/documents/udhr. The declaration focuses on respect and equality, free from intolerance. MBT embraces these ideals. We are committed to treating all stakeholders, including employees, customers, suppliers, and the surrounding community, with respect and equality.

Companies like MBT further human rights through the culture they create, how they treat their employees and other stakeholders, how they manage their operations and engage in trade, and their contributions to the communities where they live.

MBT's Human Rights Policy is built on a culture of developing and maintaining positive engagement with all the individuals and organizations that we encounter through our business dealings. We want our employees and stakeholders to grow, not only as contributors to the business but also as fair-minded people. On top of this foundation, our Code of Ethics and Business Conduct and general policies set forth specific requirements for how we do business and what we expect of those with whom we do business.

Employees

- MBT respects and values the rights of employees and endeavors to provide all its stakeholders a safe and inclusive workplace. We want our employees to reach their maximum growth potential and strive to create an environment of respect and dignity, actively protecting and furthering their human rights. We encourage engagement and open dialogue between all levels of the workforce, including management. We respect the diverse social customs and cultural traditions each of our employees may offer to the group. Finally, through listening to our employees and valuing their opinions, we believe our company's performance is enhanced, and our community is made stronger.
- MBT does not tolerate discrimination and endeavors to ensure fair and equal compensation for all
 its employees regardless race, color, creed, or protected status. We strive to provide a workplace
 without fear of discrimination, harassment, and retaliation. MBT extends the same principle of
 respect for the individual to our customers, suppliers, partners, and competitors.
- MBT employees have a right to good working conditions, fair wages, and reasonable work hours.
- MBT does not tolerate the use of child labor, forced labor, bonded labor, or human trafficking.

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- MBT provides reasonable accommodations for qualified employees based on disabilities, religious beliefs, pregnancy/childbirth, and other similar conditions.
- MBT considers our employees' health and well-being of paramount importance and endeavor to operate our facilities and equipment safely. We extend this commitment to customers, suppliers, contractors, and any other visitors to our facilities.
- MBT is dedicated to protecting the privacy and personal information of our employees and stakeholders. Our policies and systems are designed to safeguard the use and access of personal information and to conform with regulatory and legal obligations.

Supply Chain

- MBT is committed to maintaining the highest ethical and business conduct standards with suppliers and the procurement of goods and services. We look upon our suppliers as true partners with a mutual interest to improve each other's business through forthright business practices built on honesty and respect.
- MBT expects our suppliers to embrace similar values and to further our commitment to human rights.
 The company promotes the *Code of Ethics and Business Conduct* as part of its internal employee training programs, including our employee's interactions with suppliers.

Programs and Products

- MBT is committed to upholding exemplary ethical and business conduct standards in its operations, products, and services.
- o MBT reviews and assesses the ramifications of how its designs and manufactures products, including the potential consequences to the supply chain and the end-user.

Community

For MBT, being a good corporate citizen means improving people's lives in the communities where
we live and work. We are committed to serving as good citizens in our communities and advancing
our values of respect for all individuals, equal opportunity, diversity, inclusion, and protecting our
environment.

The Environment

- MBT conducts its operations in an environmentally responsible manner, in compliance with all applicable legal requirements.
- o MBT considers the potential environmental impacts of the products we design, engineer, and manufactures and works to reduce waste and inefficiency.
- MBT believes it has a responsibility to its employees and the community at large to operate its facilities to minimize and eliminate environmental impacts.

Commitment to Integrity

 MBT's commitment to integrity lies at the core of our culture. We work every day to ensure an open, inclusive, and ethical work environment in which our employees strive to do the right thing while serving our many stakeholders and ensuring the long-term success of our enterprise.

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Accurate Public Disclosures

 MBT endeavors that all disclosures made in reports and documents are complete, fair, accurate, timely, and understandable. This obligation applies to all employees, including all executives, with any responsibility for preparing and communicating such reports. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

At MBT, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that MBT is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we *should* do so. Each of us is responsible for knowing and adhering to the values and standards outlined in this Human Rights Policy and the *Code of Ethics and Business Conduct* and raising questions if we are uncertain about company policy. If we are concerned about whether the standards are being met or are aware of violations of the Policy, we must voice our concerns to the executive management team and or the HR department.