



## **Anti-Bribery and Anti-Corruption Policy**

### **Purpose**

Precision Die and Stamping is committed to conducting our business in accordance with all applicable laws, rules and regulations and the highest ethical standards, and this commitment is embodied in the Code of Ethics and Business Conduct.

The purpose of this Anti-Bribery and Anti-Corruption Policy is to reiterate Precision Die and Stamping's commitment to full compliance by the Company, its officers, directors, employees and the U.S. Foreign Corrupt Practices Act ("FCPA"), and any local anti-bribery or anti-corruption laws that may be applicable. This Policy supplements Code of Ethics and Business Conduct and all applicable laws and provides guidelines for compliance with FCPA, and Company policies applicable to Precision Die and Stamping.

For the purposes of this Policy, a "contractor" or "supplier" is defined as a third-party entity or individual who provides, and receives payment for, services or goods related to any aspect of a Precision Die and Stamping operation, and includes consultants and subcontractors. A "non-supplier vendor" is defined as a third-party individual, company, organization, and/or Government or Government related entity that will receive payment from Precision Die and Stamping but will not provide goods or services in return.

### **Scope**

This Policy is applicable to every employee of Precision Die and Stamping, including senior executive and financial officers, and to members of the Precision Die and Stamping Board of Directors. The reporting requirement of this Policy is also applicable to Precision Die and Stamping's contractors and suppliers. This Policy is intended to supplement all applicable laws, rules, and other corporate policies. It is not intended to supplant any local laws.

### **Definition**

Corruption is the misuse of public power for private profit, or the misuse of entrusted power for private gain. Bribery is the offer, promise, or payment of cash, gifts, or even excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person's views or conduct or to obtain an improper advantage. Bribery and corruption can take many forms, including the provision or acceptance of:

- Cash payments;
- Phony jobs or "consulting" relationships;
- Kickbacks;
- Political contributions;
- Charitable contributions;
- Social benefits; or
- Gifts, travel, hospitality, and reimbursement of expenses.



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### **Policy Requirements**

Precision Die and Stamping personnel and agents are strictly prohibited from offering, paying, promising, or authorizing:

- any payment or other thing of value;
- to any person;
- directly or indirectly through or to a third party;
- for the purpose of (i.e., in exchange for); or causing the person to act or fail to act in violation of a legal duty;
- causing the person to abuse or misuse their position; or
- securing an improper advantage, contract or concession; for Precision Die and Stamping or any other party.

### **Improper Payment Activity**

Precision Die and Stamping's books and records must correctly record both the amount and a written description of any transaction. Precision Die and Stamping personnel must ensure that there is a reasonable relationship between the substance of a transaction and how it is described in the Company's books and records. It is contemplated that Precision Die and Stamping will institute detailed procedures and standards related to training, due diligence, the recording of transactions, and other areas, to implement the terms of this Policy.

### **Interaction with other corporate policies**

Other Precision Die and Stamping policies impacted by, and which should be construed consistent with this Policy, include the Code of Ethics and Business Conduct.

### **Discipline**

Any employee who violates the terms of this Policy will be subject to disciplinary action. Any employee who has direct knowledge of potential violations of this Policy but fails to report such potential violations to Company management will be subject to disciplinary action. Any employee who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action. In all cases, disciplinary action may include termination of employment. Any third party agent who violates the terms of this Policy, who knows of and fails to report to Precision Die and Stamping management potential violations of this Policy, or who misleads investigators making inquiries into potential violations of this Policy, may have their contracts re-evaluated or terminated.