



**DAVRON TECHNOLOGIES, INC**  
**CODE OF ETHICS AND**  
**BUSINESS CONDUCT**

Our commitment to ethical behavior and solid ethical foundations are one of the most essential components of Davron Technologies, Inc. operations. We are committed to doing business the right way, based on a culture of ethics and compliance.

In the long term, we can successfully face the challenges of a competitive market environment by accepting the imperatives of moral responsibility, both as individuals and as a company. In performing their job duties, employees should always act lawfully, ethically, and in the best interests of Davron Technologies, Inc.

Thank you for upholding our values and helping us do things right. This does not only mean that we provide well made, fairly priced and exceptional quality products and services but also that ethics and integrity are always borne in mind. We source only from suppliers who have human rights and compliance records which are above reproach. We ensure that our supply chain is of high integrity and monitor our entire operation for compliance with our Code of Ethics.

**1. Introduction**

This CODE OF ETHICS AND BUSINESS CONDUCT of Davron Technologies, Inc. serves as our ethical commitment statement and guide to proper business conduct for all our stakeholders. We, at Davron Technologies, Inc., are committed to doing business legally, ethically, and in a transparent manner.

This document applies to all staff who work for the Davron Technologies, Inc. (including officers, directors, managers, team leaders, employees, temporary, agency, interim, sub-contractor, or consultant staff), and will be applied to other organizations who do business with us.

Davron Technologies, Inc. expects its staff to be impartial and honest in all affairs relating to their work. All staff bear a responsibility to act in good faith and exercise due care so as not to damage the trust necessary to maintain both your and the Company's professional credibility and the Company's ethical standards.

The success of our organization is based on the trust we create, earn, and maintain from our employees, customers, and other stakeholders. We gain credibility by adhering to our commitment to fairness and reaching our business goals solely through ethical conduct. All staff are expected to adhere to this Code in their corporate as well as individual conduct. This includes treating everyone with respect, honesty, and fairness.

Davron Technologies, Inc. is open to questions regarding this Code and will not allow retaliation against any individual for reporting conduct they believe in good faith contradicts or undermines it.

Managers and other Company leaders have greater responsibility for demonstrating, through both their words and their actions, the importance of this Code. Managers and leaders also are responsible for promptly addressing ethical questions or concerns which are brought to them. All employees must cooperate in investigations of potential or alleged misconduct arising under this Code.

Non-compliance with this Code will be considered misconduct that will warrant disciplinary action, up to and including termination of employment or a contractual relationship based on severe, patterned, and/or repeated incidents. Attempts to cover up one's own or another's conduct which violates this Code also will be grounds for immediate termination of employment or a contractual relationship, as applicable.

We are committed to making efforts to apply our values and norms throughout the entire value chain of our suppliers, sub-contractors, service providers, and other business partners.

## **2. Ethical Principles / Values**

Our core values at Davron Technologies, Inc. are:

Honesty • Integrity • Trustworthiness • Respect for others • Responsibility • Accountability • Reliability  
Obedience to the law

## **3. Ethical Decision-making**

Ethical conduct is a result of value-driven decision-making. Several key questions can help to identify situations that may be unethical, inappropriate, or illegal. For instance, ask yourself:

Is what I am doing legal? • Does it reflect our Company values and ethics? • Does it comply with the CODE OF ETHICS AND BUSINESS CONDUCT and other Company rules/policies? • Does it respect the rights of others? • How would it look if this decision made the news headlines? • Is this decision in the best interest of the Company without unlawfully harming the interests of others? • Is this the right thing to do? • Have I been asked to misrepresent information or deviate from normal procedures in making this decision? • Do I believe I have sufficient information and have had sufficient time to make this decision?

## **4. Compliance with laws and regulations**

Our commitment to integrity begins with complying with applicable laws, rules, and regulations. We accordingly make it part of our decision-making process to understand and comply with the legal requirements and commercial practices of our business. We are committed to adhere to the contractual agreements that we enter. Our staff must follow applicable laws, rules, and regulations at all times and must ensure compliant operation. Questions regarding legal or other regulatory compliance should be directed to Human Resources.

## **5. Sustainability: People + Profit + Planet**

We are committed to meet current business requirements without compromising the needs of future generations. To this end, we consider economic, environmental, and social factors in our operations and business decisions.

## **6. Human rights**

We are committed to respect human dignity and the rights of each individual and community with whom we interact during the course of our work. We shall not, in any way, knowingly cause or contribute to the violation of human rights. Our staff shall treat all persons with dignity, respect, and care and uphold human rights.

## **7. Fair labor practices and working conditions**

We are committed to promote equality in our employment practices and to fair employment and remuneration policies in compliance with applicable laws. We are firmly opposed to employ or contract child or slave labor or any form of forced, compulsory, or bonded labor. We condemn all forms of illegal, unfair, unethical labor practices that exploit workers, denies social security or serves as tax evasion, including, but not limited to, undeclared and "grey" work or holding back worker wages. Our staff shall act with integrity and treat their colleagues and others with whom they work with, respect.

We will comply with local minimum age laws and requirements and in any case will not employ child labor (defined as any person under the age of 16). Age exceptions will be made where legally allowable for

authorized job training or apprenticeship programs that bear a clear benefit to the participants. Positions or activities that involve increased risk require appropriate safety training and require employees to be older than 18 years.

Company and/or Supplier will comply with local applicable laws regulating working hours, allowing for alternate schedules to be utilized in meeting business needs so long as the schedule remains in compliance with applicable local laws.

**8. Work Authorization**

We will require employees and labor suppliers meet work permit compliance and global immigration requirements as well as legal work authorization requirements in the respective country of operation.

**9. Compensation**

We will provide competitive wages and benefits to employees which meet or exceed the legally required minimums.

**10. Discrimination and harassment**

We provide equal opportunity in employment and do not tolerate unlawful discrimination or harassment or any form of bullying or abuse. Discrimination or harassment shall not take place based on any legally protected trait or characteristic, such as gender, age, national origin, color, religion or disability.

All staff is expected to follow the highest standards of conduct in all verbal and written communication based on mutual respect, and must refrain from any form of harassment, slander or other behavior that could be taken as offensive, intimidating, humiliating, malicious, or insulting.

**11. Health, safety and environment**

We provide clean, safe, and healthy work conditions, and we are dedicated to maintaining a healthy environment. Accordingly, we are committed to minimize the impact of our operations on the natural environment. We make efforts to reduce the use of finite resources, like energy or water, and harmful emissions, like waste. All staff must follow and comply with applicable health, safety, and environmental protection laws, regulations, and rules.

We are focused on the below actions to continuously improve our environmental impact: explore more energy efficient ways to conduct our day-to-day operations, expand our investment in solar energy and other renewable energy sources, reduce waste and greenhouse gas emissions, pursue better ways to manage hazardous chemicals and natural resources, educate and train employees on the latest environmental regulations and implementation strategies, and take corrective actions when needed.

**12. Responsible Raw Material Sourcing**

We will strive to ensure the natural raw materials used in our products are produced in a way that contributes to sustainable development, preserves natural resources, and helps maintain and enhance biodiversity. The responsible sourcing of raw materials, together with the aforementioned environmental and sustainability goals, aims to continuously push the industry forward and support the development of more sustainable practices to both reduce environmental risks as well as help to enhance livelihoods and protect ecosystems.

**13. Fair competition and business conduct**

Our business partner relationships are built upon trust and mutual benefits compliant with fair competition laws. We are dedicated to ethical and fair competition, as we sell products and services based on their quality, functionality, and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities, nor will we engage or assist in unlawful boycotts of particular customers, suppliers, or vendors. We commit to comply with all applicable lawful trade controls, restrictions, economic sanctions, and import / export embargoes and controls.

We do not allow any violation of the fairness of any tendering process. We refrain from damaging competition or the reputation of any business partners or behavior that harms a competitor's credibility.

We do not unlawfully hold back payments to our business partners, and we do not allow such practices in our supply chain. We oppose the unethical practice of creating a "debt chain."

Our staff is responsible for ensuring fair business practices and adhering to fair competition, consumer protection, and fair marketing practices. Customers and business partners shall be treated fairly. Products and services shall be displayed in a manner that is fair and accurate (i.e., fair marketing and advertising) and that discloses all required information (hazardous materials and other product warnings, etc.).

#### **14. Counterfeit parts**

We understand the negative impact that counterfeit, fraudulent, and suspect parts may pose to our products' safety, performance, and reliability. We take many steps to avoid situations such as these including following a standard receiving procedure in which part documentation is required, collected, verified, and stored for later use if needed. We strive to source our materials from proven and reliable suppliers. We are transparent in communication both internally and externally with suppliers, customers, etc.

#### **15. Anti-corruption**

We firmly condemn and do not tolerate any form of corruption. It is prohibited directly or indirectly to offer, promise, give, ask, solicit, or accept any unfair advantage or benefit in order to obtain, retain, or facilitate in any way our business. An unfair advantage or benefit may include cash, any cash equivalent (e.g., voucher), gift, credit, discount, travel, personal advantage, or services which are not normally offered. We do not permit bribes, facilitation (or "grease") payments to government officials or private business contacts in order to secure or speed up routine actions. Corruption also covers the misuse of a business function, opportunity, or position as well, when someone, for instance, presents a false appearance that s/he can improperly influence a decision maker.

Corruption either to obtain or retain business or to obtain or retain an unfair advantage in the conduct of business is considered gross misconduct. Similarly, offering, accepting, or allowing another person to offer or accept a bribe is considered gross misconduct. Our staff has to account for all benefits received in the course of doing business and must not give or receive bribes or otherwise act corruptly. Similarly, extortion of any kind, whether it be via threats or force, among employees or externally with customers, suppliers, vendors, or other business partners will not be tolerated.

#### **16. Gifts and hospitality**

We shall avoid any actions that create a perception that favorable treatment was sought, received, or given in exchange for personal benefit.

Business courtesies or benefits include gifts, gratuities, meals, refreshments, entertainment or other advantages from persons or companies with whom we do or may do business. We will neither give nor accept such benefits that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate an applicable law, regulation, or policy, or would otherwise cause embarrassment to the professional reputation of our Company or any member of our staff. Our staff also may not use personal funds or resources to do something that cannot be done with Company resources.

We may accept and offer occasional gifts and hospitality that are customary and conform to reasonable ethical practices of the market, provided that they are not inappropriately excessive, not frequent, and do not reflect a pattern of frequent acceptance or create the appearance of an attempt to improperly influence business decisions. Only trivial gifts of low value can be accepted. All other gifts must be politely refused or, if received through delivery, returned to the giver. If return is not possible, the gift shall be offered for charity or community use purposes. It is the responsibility of the person offering, providing, receiving, or, as

applicable, accepting the gift to decide whether the gift is appropriate. Questions regarding this Code section should be directed to Human Resources.

**17. Security, protection, and proper use of Company assets**

We are responsible for the security, protection, and economical use of Company resources. Our resources, including time, material, equipment, and information are provided for legitimate business use only. Occasional personal use is permissible as long as it is lawful, does not damage or otherwise compromise the equipment, etc. being used, affect job performance or business use of the equipment, etc., or otherwise disrupt the workplace.

All staff is obliged to follow appropriate security measures, should treat Company property, whether material or intangible, with respect, and should not abuse or misuse Company property or otherwise use it carelessly.

**18. Confidentiality, information security, proprietary information, and intellectual property**

We are committed to business information confidentiality, integrity, and accessibility. We implement proper technical security measures, and it is our staff's obligation to comply with and uphold these.

Proprietary information includes all non-public information that might be harmful to the Company or its customer or other, business partners and/or which could provide an unfair competitive advantage if disclosed to unauthorized parties. All staff accordingly must handle any such information as protected and secret. Internal and external rules ensuring information security must be followed all times.

We respect the property rights of others. We accordingly will not acquire or seek to acquire trade secrets or other proprietary or confidential information of others by unauthorized/improper means. We also will not engage in unauthorized use, copying, distribution, or alteration of software or other protected intellectual property.

**19. Bookkeeping, true reporting and financial integrity**

Our books, records, accounts, and financial statements must be maintained in appropriate detail, and must truly and properly reflect our business transactions. We condemn all forms of money laundering, so we are committed to doing business with partners involved in legitimate business activities with funds derived from legitimate sources.

We are committed to fair taxation and avoiding unlawful tax evasion practices, including such practices as failing to issue receipts or issuing fake invoices.

All staff must follow standard accounting procedures, ensure that business transactions are recorded and documented appropriately, and ensure that all disclosures made in financial reports are full, honest, accurate, timely, and understandable. Our staff must not improperly influence, manipulate, or mislead any audit.

**20. Anti-Fraud**

Fraud – the act or intent to cheat, steal, deceive, or lie – is both unethical and, in most cases, criminal. Fraud in every form, (including e.g., submitting false expense reports; forging or altering financial documents or certifications; misappropriating assets or misusing Company or others' property; making an untrue financial or non-financial entry on business-related records or statements) is prohibited.

**21. Conflicts of interest**

Our decisions shall be based on objective and fair assessments avoiding as much as possible any improper influence. A "conflict of interest" exists when an employee's personal interest (that can be linked to e.g., friends or family) interferes or potentially interferes with the best interests of Davron Technologies, Inc. Determining whether a conflict of interest exists is not always easy to do, thus anyone with a conflict-of-interest question should seek advice from Human Resources.

Conflicts of interest could arise:

- If a staff member or his/her close friend or family member is employed by, owns, or otherwise has a significant economic connection or other relationship with an actual or potential customer, competitor, supplier, or contractor of Davron Technologies, Inc.
- Hiring or supervising family members or other closely related persons to work for Davron Technologies, Inc.
- Serving as a board member for another company or organization which does business with or seeks to do business with Davron Technologies, Inc.
- Owning or having a substantial interest in a customer, competitor, supplier, or contractor of Davron Technologies, Inc.
- Having a personal interest, financial interest, or other opportunity for personal gain in a Company transaction (aside from receiving a bonus or other lawful compensation offered by the Company).
- If co-workers become involved in dating or other close personal relationships with each other, the onus is on the senior employee involved to bring this to the attention of Human Resources in order to confirm that there is no present or potential conflict of interest that needs to be addressed.

## **22. Privacy and personal data protection**

We respect people's privacy and acknowledge customers, employees, and other natural persons' need to feel confident that their personal data is processed appropriately and for a legitimate business purpose. We are committed to comply with all applicable personal data protection laws. We only acquire and keep personal information that is necessary, and we provide proper information on these activities to data owners as required by applicable law. We have implemented proper security measures to assure confidentiality, integrity, and only authorized availability of legally protected personal information. Our staff must observe applicable legal requirements, apply compliant practices, and follow related procedures to ensure the legality of their personal data handling and processing activities.

## **23. Community Engagement & Indigenous Populations**

We will consider local communities to be among the primary stakeholders in our projects and activities within those communities. We will work constructively with local officials who have an interest in projects and activities that may impact the local community.

We support the value of diversity. Through our Equal Employment Opportunity policy and other policies and initiatives, we seek to enrich our business environment and create positive, effective relationships with employees, customers, our supply base and local communities.