



ETHICS POLICY

Powmet, Inc. ("Powmet" or the "Company") is committed to operating with the highest standards for business ethics, human rights, environmental protection and workers' rights and expects our business partners to share this commitment.

Everyone at or involved with Powmet should feel comfortable to express his or her concerns, particularly with respect to ethics concerns. Management has the responsibility to create an open and supportive environment where employees and suppliers feel comfortable raising such questions.

Ethics policy can be found on www.powmet.com (website). This would allow for the highest visibility for those involved with Powmet at all levels.

Corporate Policy

Powmet prohibits bribery in all business dealings, in every country around the world, with both governments and the private sector.

Powmet maintains strong controls aimed at preventing and detecting bribery. This includes a rigorous process for appointing and managing third parties acting on Powmet's behalf in business dealings.

Powmet maintains accurate books, records, and accounts that correctly reflect the true nature of all transactions, according to generally accepted practices.

Management Expectations

- Personally set the example for integrity, not just through words, but more importantly, through actions.
- Ensure employees understand that business results are never more important than ethical conduct and compliance with Powmet policies.
- Create an open environment in which every employee feels comfortable raising concerns.
- Communicate the importance of compliance with sincerity and conviction at every appropriate opportunity.
- Develop strong processes to anticipate risks, including new and changing regulations.



Fair Employment Practices

Powmet bases employment decisions on job qualifications and merit which include education, experience, skills, ability, performance, and growth values.

Employment decisions should also be made without considering a person's race, color, religion, national or ethnic origin, sex (including pregnancy), sexual orientation, gender identity or expression, age, disability, veteran status or other characteristic protected by law.

We respect human rights everywhere we work and do business with others.

Powmet will comply with all laws pertaining to freedom of association, privacy, collective bargaining, immigration, working time, wages and hours, as well as laws prohibiting forced, compulsory and child labor, trafficking in persons and employment discrimination.

Employee Expectations

- Stay attuned to developments in your area or industry that might impact Powmet's compliance with laws and regulations or reputation in the marketplace.
- Understand that the "Company" may review, audit, monitor, intercept, access and disclose information processed or stored on Powmet equipment and technology, or on personally-owned devices permitted "Powmet" network access.
- Cooperate fully and honestly in "Company" investigations related to integrity concerns.
- Know and comply with the laws and regulatory requirements that affect your job responsibilities.
- Treat regulators professionally, with courtesy, honesty and respect at all times.
- Promptly escalate any potential issues that may lead to a regulatory compliance breach.

Supplier Relationships

Powmet relationships with suppliers must be based on lawful and fair practices.

Powmet expects suppliers to comply with all applicable legal requirements and Powmet guidelines relating to labor, employment and environment, health and safety and that treat workers and other fairly and with respect.



Powmet, as a business enterprise, promotes respect for human rights.

Powmet safeguards information, including confidential and proprietary information and personal data, for customers, suppliers, and “Company”.

Environment, Health & Safety

Powmet strictly complies with all environmental, health, and safety (EHS) laws that apply to our operations.

Powmet develops and follows safe work procedures to ensure workplace safety and prevent injuries.

Powmet assesses the EHS risks of any new activity, whether designing a new product, selling in a new market, building a new factory, or buying a new business.

Our EHS principles apply to everything we do – from making or servicing products and buying businesses to driving vehicles and disposing of waste.

International Trade Compliance

Powmet will comply with all export control, economic sanctions and customs laws that regulate cross-border transfers of goods and technology.

Customs

- Follow all business procedures relating to the import of goods.
- Ensure “Company” fully complies with special program requirements before claiming reduced duty rates.

Export Controls

- Follow all business procedures relating to the export of goods, software or technology.
- Use the export classification of goods, software or technology to determine if they require government authorization for export.
- Confirm all necessary licenses or authorizations are in place before any export transaction, and adhere to all export license or license exception requirements.

Anti-Money Laundering

Powmet is committed to complying with applicable anti-money laundering, corruption and terrorist financing laws and regulations.



2625 Sewell St., P.O. Box 5086, Rockford, IL
Phone: (815)398-6900
Email: powmet@powmet.com FAX: (815)398-6907

Powmet conducts business only with customers involved in legitimate business activities, with funds derived from legitimate sources.

Powmet will be alert for and report any signs of potential money laundering or other illegal activities.

Revision History

4/3/2017 – Created

10/10/2018

- Added Powmet's website and flow down for ethics policy.
- Changed Approval from William C. Thiede to Brian Thiede
- Added Revision History