



Stenson Tamaddon Anti-Corruption Policy

February 2, 2024

I. Introduction

1. Policy Statement. StenTam competes for business and pursues business objectives solely on the merits. We strictly prohibit bribes; improper, corrupt, or illegal payments; or kickbacks in any form or amount, to anyone, anywhere, for any purpose, including to inappropriately influence a government official or secure an improper business advantage. In addition, StenTam complies with all anti-bribery and anti-corruption laws wherever we do business. Our commitment to complying with these laws and regulations is essential to maintaining our brand and StenTam's reputation for integrity and fair business dealings.

2. Definitions

a. "Anything of Value" means anything that could be valuable to a recipient, including, but not limited to, cash, cash equivalents (*i.e.*, gift cards and checks), gifts, hospitality (travel, meals, and entertainment), electronic devices, real, tangible, and intellectual property, donations, employment, and sponsorships.

b. "Business Gift" means (a) any modest, customary business courtesies that are reasonable in value and frequency and are transparently given and accepted (*e.g.*, occasional business-related meals or promotional items of nominal value); and (b) anything of value given by or on behalf of StenTam or received by a StenTam employee from a current or prospective client, business partner, or third-party to build goodwill or further business relationships, without expecting anything in return. See StenTam's Gift Policy.

c. "Government Official" means any federal, state, local, municipal, or foreign government employee, officer, director (whether elected or appointed), contractor, consultant, or representative hired/engaged by or authorized to act for or on behalf of any government or any candidate for any position therein.

d. "Improper Payment" means the offering, giving, approving, promising, facilitating, or receiving anything of value, directly or indirectly, to improperly influence an official or business act or to secure any improper advantage and includes bribes and bribery.

e. "Kickback" means any employee or contractor soliciting, requesting, or receiving anything of value, directly or indirectly, from any third-party, including but not limited to, current or potential clients, business partners, vendors, or suppliers, in exchange for past, current, or future favorable business treatment or to otherwise secure an improper business advantage.

f. "Lobbying" means any contact or communication (written or verbal) by or on behalf of StenTam with any Government Official, for the purpose of advocacy on legislative, regulatory, or policy matters or programs (including the negotiation, award, or administration of a U.S. Government or state permit or license).

II. Policy

1. Bribery and other corrupt practices. StenTam strictly prohibits offering, giving, soliciting, or receiving, directly and indirectly, any bribe, improper payment, or anything of value to improperly influence an official or business act or to secure an improper advantage to anyone, anywhere, for any reason. The following policies apply to every StenTam employee:

a. Government Officials. It is strictly prohibited to offer, give, approve, promise, or facilitate the giving of anything of value, directly or indirectly, to any Government Official. This policy excludes routine and generally applicable fees paid to a government department, agency, or bureau, as required by law or regulation, including, but not limited to, permits, licenses, and essential services. In addition, this policy excludes all lawful and appropriate Lobbying.

b. Non-Government Third-Parties, including clients, business partners, vendors, and supplier. It is strictly prohibited to offer or give anything of value, directly or indirectly, to any client, business partner, vendor, or supplier for the purpose of improperly influencing an official or business act or to secure an improper advantage. The policy does not apply to any Business Gift given in accordance with the StenTam Gift Policy.

2. Kickbacks. StenTam strictly prohibits any employee or contractor to solicit or accept any kickback. The policy does not apply to a Business Gift given in accordance with the StenTam Gift Policy. The following are some—but not all—examples of impermissible kickbacks:

- a. Agreeing to sign a contract that is more expensive than with other suppliers in exchange for a substantial payment to you personally or a family member;
- b. Agreeing to purchase goods from a supplier on behalf of the Company if the supplier agrees to sell other goods at a discount to your spouse's company;
- c. Agreeing to give a potential customer a 5% discount on a quoted price in exchange for giving you or a family member tickets to a sporting event;
- d. Asking a potential customer to take you out for an expensive dinner before you decide whether the Company will sign a contract with them;
- e. Accepting money in exchange for giving business to a supplier.

III. Violation of this Policy

Violation of this policy may result in disciplinary action, up to and including termination of employment. In addition, StenTam may also require an employee who makes a payment with Company funds contrary to this policy to reimburse StenTam for any unauthorized expense or obligation.

The StenTam Chief Legal Officer is the proponent of this policy. Any questions concerning this policy should be addressed to the Chief Legal Officer, or his designee.