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Dillon Gage - Anti-Corruption & Anti-Bribery Policy

January 24, 2023

Dillon Gage is committed to maintaining the highest level of ethical standards in the conduct of its business. It is the policy of Dillon Gage to comply with all relevant laws and regulations prohibiting bribery and corruption, including, but not limited to, the U.S. Foreign Corrupt Practices Act (“FCPA”) and other applicable anti-bribery statutes and implementing rules and regulations in force in the jurisdictions in which Dillon Gage conducts its business.

This Policy prohibits Dillon Gage employees and all third parties and other business partners retained by Dillon Gage to act its behalf from engaging in any corrupt activity, including specifically by directly or indirectly offering, promising, providing, or authorizing anyone to provide, money or “anything of value” to a “government official” or any private individual or entity for the purpose of obtaining or retaining any “improper advantage” in the conduct of Dillon Gage’s business.

The term “**government official**” means:

- Any officer or employee, appointed or elected, of a local, state, regional, or federal government, or any department, agency, ministry, or instrumentality of a government;
- Any individual who, although temporarily or without payment, holds a public position, employment, or function;
- Any officer or employee of a public international organization, such as the United Nations or the World Bank;
- An individual acting in an official capacity for or on behalf of a government department, agency, ministry, instrumentality, or public international organization;
- A political party official, officer, or employee, or any candidate for political office;
- Any officer or employee of an entity owned or controlled by a government, as well as entities that perform a government function (e.g., air or sea transport, utility, energy, water, or power); or
- A member of a royal family, including one who may lack formal authority, but could otherwise be influential in advancing Dillon Gage’s business interests, through, for example, partially owning or managing a state-owned or state-controlled entity.

The term “**anything of value**” is broad and can include any item or thing of value to the recipient. Common examples include the following:

- Cash or the equivalent (including gift cards) in the form of kickbacks or otherwise;
- Benefits and favors (such as special access to a government agency);
- Performing services that would otherwise have to be paid for or purchased;
- Gifts;

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- Contracts or other business opportunities awarded to a company in which a government official has an ownership or other beneficial interest;
- Employment or consultancy opportunities;
- Charitable donations;
- Political contributions;
- Medical, educational, or living expenses;
- Travel, meals, lodging, shopping, or entertainment expenses; or
- Any information about Dillon Gage that it considers confidential and/or proprietary (including any material, non-public information).

The term “**improper advantage**” covers almost any improper payment made in a business context, such as paying or giving anything of value to a government official or private individual or entity, directly or indirectly, in order to:

- Influence or prevent any decision or action, such as the awarding of a contract, imposition of a tax, fee or fine, favorable classification for customs or other duties, granting or expedition of a permit or license, or the cancellation of an existing contract or contractual obligation;
- Obtain a license, permit, or other authorization from a government entity or government official that Dillon Gage is not otherwise entitled to;
- Obtain confidential information about business opportunities, bids, or the activities of competitors;
- Influence the award of a contract or sales agreement or specifications of tenders or requests for proposals;
- Influence the termination of a contract that would be disadvantageous to Dillon Gage; or
- Secure any other unfair or improper advantage.

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Jon Christiansen
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Jon Christiansen
C.F.O.
Dillon Gage Metals

2/8/2023 | 6:58 AM PST

Date:

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