

Title:	<b>Anti-Corruption Policy</b>	Number:	01-13.0
Originator:	Manager, Ethics & Compliance	Effective Date:	13-MAY-2025
Approver:	CEO & Director	Revision:	01

**SUMMARY OF CHANGES:**

- No changes

**POLICY STATEMENT:**

Intrepid Acquisitions Holdings, LLC along with its subsidiaries and affiliates (collectively “the Company”), is committed to ethical business practices and to obeying both the spirit and the letter of the law in every country in which it does business. The Company strictly prohibits corruption, bribery or any other improper payments in business dealings.

Under a variety of applicable anti-bribery laws, bribery is a criminal offense punishable by imprisonment and/or fines for both the Company and, separately, any person involved in the bribery. The Company takes its legal responsibilities to prevent bribery very seriously and expects its Employees and Third Parties to do the same. The fact that bribery may be a customary business practice in a given country is not a justification for violation of this policy.

The directors and executive management of the Company fully support this Anti-Corruption Policy and expect full compliance with its terms from every single employee, whether permanent, fixed-term, or temporary (collectively, “Employees”). The same expectation applies to employees of Third Parties acting on the Company’s behalf.

**DEFINITIONS**

Bribery (or bribe): Giving, offering, promising, requesting, or authorizing the giving of anything of value, directly or indirectly, to any person or entity to induce a person to act, or refrain from acting, in relation to the performance of their duties, in order to obtain or retain any advantage or benefit.

Anything of value: Includes, but is not limited to: cash, cash equivalents (such as gift cards, kickbacks or discounts), benefits or favors, entertainment, gifts, hospitality, meals, travel, charitable contributions, political contributions or employment opportunities. There is no minimum value for something to be considered “of value.”

Facilitating payments: Payments made to public officials to encourage them to expedite a routine or common governmental task that the official is otherwise required to undertake even if the payment were not made, such as issuing permits or licenses.

Gift: Includes any tangible object of any kind, regardless of value.

Public official: A government official, whether elected or appointed; an officer or employee of a government agency or state-owned or state-controlled entity; a person performing a public service on behalf of a government or government agency; a political party or party official; a candidate for political office; any person acting in an official capacity; or an officer or employee of a public international organization.

Hospitality: Meals, lodging, or any event or form of entertainment (including sporting events, parties, plays and receptions).

Third party: Any person or entity who acts on behalf of or represents the Company, including but not limited to sales agents or representatives, distributors, consultants, lobbyists, transportation or logistics providers, customs clearing agents, or any person or entity retained to represent the Company in a matter before a public official, government agency, or in tax or legal matters.

**Bribery and Facilitating Payments:** The Company, its Employees and third parties are prohibited from offering or giving a bribe, whether directly or indirectly, to any person or entity. The Company, its Employees and third parties are prohibited from offering or giving a bribe, whether directly or indirectly, to any person or entity are prohibited from requesting or receiving a Bribe, directly or indirectly, from any person or entity. All demands for bribes or kickbacks must be expressly rejected.

The Company, its Employees and the Company's third parties are prohibited from offering or making facilitating payments to public officials.

If a Company employee or third party believes there is a serious threat to a person's health or safety if a payment demand is not met, such payment would not be considered a prohibited bribe. In that situation, the employee or third party should report the incident to the Ethics and Compliance department as soon as possible and the payment must be properly recorded in the Company's books and records.

Employees and third parties who refuse to pay a bribe or make a facilitating payment will not suffer any penalty, demotion or other adverse consequence as a result, even if the Company loses business. Employees and third parties are required to report any suspected violations of this Anti-Corruption Policy to the Ethics and Compliance department by calling 877-296-8010 or reporting online by accessing [www.intrepid.ethicspoint.com](http://www.intrepid.ethicspoint.com), and no employee or third party will suffer any penalty, demotion or other adverse consequence for reports made in good faith. Reports will be treated confidentially to the extent possible, consistent with the need to conduct a thorough investigation.

**Charitable Contributions:** No charitable donations may be given, offered, promised or authorized without express authorization from the appropriate company resource. If a donation is authorized, it must fully comply with all applicable laws and be properly and accurately reflected in the Company's books and records.

**Gifts, Hospitality and Travel:** Neither the Company, its Employees, nor its third parties shall offer or receive gifts, hospitality or travel whenever these could affect the outcome of business transactions or other matters the Company is involved in, or where doing so would be in violation of the laws of the recipient's country.

All gifts, hospitality and travel must be made consistent with the Company's Anti-corruption Policy, its related Compliance Plan guideline and be properly and accurately recorded in the Company's books, records and accounts. The Company, its Employees and third parties shall not offer or receive gifts, hospitality or travel that are not reasonable and legitimate business expenditures. Any gifts, hospitality or travel offered or provided must be directly related to the promotion or demonstration of the Company's products or services, or directly related to the performance of a contract with a government, government agency, or state-owned or controlled entity. Any expenses that do not meet these criteria will not be reimbursed or otherwise paid for by the Company.

In order to qualify for reimbursement, proposed expenses must be explicitly detailed in the request, i.e., broken down by names and positions of government officials, dates and places of travel, and the amount and type of specific expenses. The Company reserves the right to deny, in whole or in part, any expenses related to the travel of a government or political party official (including officers and employees of government-owned or government-controlled enterprises) for any reason. Employees who authorize the reimbursement or payment of expenses covered by this section without following the above procedures will be subject to disciplinary action, including termination of employment.

---

Conflicts of Interest: The Company and its Employees shall avoid any relationship or activity that might impair, or reasonably appear to impair, their ability to render objective and appropriate business decisions in the performance of their jobs.

Books and Records: The Company is committed to maintaining complete and accurate books, records and accounts. All transactions, including payments, reimbursement requests, expenditures, expense reports, invoices, vouchers, gifts, and business entertainment must be properly and accurately entered into the Company books, records and accounts in a timely manner, in detail, and with supporting documentation.

Training: The officers, directors and Employees must participate in anti-bribery training on a periodic basis. Employees must certify annually that they have read this policy and that they are acting and will continue to act in compliance with this policy.