

Title:	<b>Anti-Corruption Policy and Plan</b>	Number:	01-13.0
Originator:	Manager, Ethics & Compliance	Effective Date:	20-JAN-2026
Approver:	Chief Legal Officer	Revision:	02

## **1. PURPOSE**

Intrepid Acquisitions Holdings, LLC (the “Company”) maintains a zero-tolerance policy toward all forms of corruption, including Bribery, kickbacks, and fraud. We are committed to conducting business with the highest degree of integrity and honesty, as required by FAR 3.1002. All Employees must comply with the Foreign Corrupt Practices Act (FCPA), the Anti-Kickback Act, and all applicable local laws.

## **2. SCOPE**

This policy applies to all Employees of Intrepid Acquisition Holdings, LLC, as well as those of its subsidiaries.

## **3. DEFINITIONS**

“*Anything of value*” means Gifts, gift or sale of stock or other investment opportunities in other than an arm's length transaction for demonstrated fair market value, selling to a Foreign Official at deflated prices or buying from an official at inflated prices; Contracts or other business opportunities awarded to a company in which a Foreign Official holds a beneficial interest; Medical, educational, or living expenses; or Travel, meals, lodging, shopping or entertainment expenses.

“*Bribery*” (or “*Bribe*”) means 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.

“*Facilitating Payments*” means 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.

“*Foreign Official*” means any person who exercises government authority or performs a public function for a foreign state.

“*Foreign Intermediary*” means any Third Party, such as an agent, consultant, distributor, joint venture partner, or broker, used to facilitate interactions with foreign government officials on behalf of an organization.

“*Gift*” means any tangible object of any kind, regardless of value.

“*Hospitality*” means meals, lodging, or any event or form of entertainment (including sporting events, parties, plays and receptions). “*Public official*” means 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.

*“Third Party”* means 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.

## **4. RESPONSIBILITY**

The Chief Legal Officer is responsible for administering this Policy, including updating the Policy as changes occur, withdrawing the Policy when necessary, and reviewing periodically to assess its ongoing alignment with business needs and local, state and federal legislation and regulations.

## **5. POLICY**

The Company, along with its subsidiaries and affiliates, 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 number of applicable 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.

Company management 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.

A. 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 requesting or receiving a Bribe, directly or indirectly, from any person or entity. Employees must specifically reject all demands for Bribes or kickbacks and immediately report them to the Chief Legal Officer.

Generally, the Company, its Employees and the Company’s Third Parties are prohibited from offering or making Facilitating Payments to public officials. However, if the Company, its 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 Bribe. In that situation, the Employee should seek direction from the Ethics and Compliance department, which will work with the Chief Legal Officer to determine how best to proceed, to include how to record such

payment 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 consequences as a result, even if the Company loses business.

- B. Charitable Contributions: Consistent with the Company's Signature Authority, no Employee may give, offer, or promise a charitable donation without express authorization from the Chief Legal Officer. 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.
- C. Gifts, Hospitality and Travel: Neither the Company, its Employees, nor its Third Parties may 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 and be properly and accurately recorded in the Company's books, records and accounts. The Company, its Employees and Third Parties will 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. The Company will not reimburse for any expenses that do not meet these criteria.

In order to qualify for reimbursement, Employees must explicitly detail all proposed expenses 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 Foreign 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.

- D. Conflicts of Interest: The Company and its Employees will 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 as defined in 01-02.7 Conflict of Interest Policy.
- E. Books and Records: The Company is committed to maintaining complete and accurate books, records and accounts. Employees must accurately and properly enter all transactions, including payments, reimbursement requests, expenditures, expense reports, invoices, vouchers, Gifts, and business entertainment into the

Company's books, records and accounts in a timely manner, in detail, and with supporting documentation.

F. Training: All 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.

## **6. ANTI-CORRUPTION LAWS AND COMPLIANCE REQUIREMENTS**

### **A. U.S. Foreign Corrupt Practices Act (FCPA)**

- The Company, will conduct its business in accordance with applicable U.S. laws, rules and regulations, including the FCPA, and applicable local anti-bribery or anti-corruption laws, rules and regulations in all of its operations worldwide.
- The FCPA imposes both civil and criminal liability on individuals as well as corporations. For individuals who violate the anti-bribery provisions of the FCPA, criminal penalties include fines of up to \$250,000 and imprisonment for up to 5 years. For corporations, violation of the Books and Records and Internal Controls provisions can result in criminal fines up to \$5 million. Further, individuals and corporations are subject to other consequences, including exclusion or debarment from certain federal programs and ineligibility to receive export licenses.
- The FCPA contains no materiality standard, which means that all violations, regardless of the sum of money involved, are considered equally serious. Any Employee who violates this Policy will be disciplined and is subject to termination.

**Prohibited and Restricted Payments.** The FCPA prohibits the offer, promise, authorization, or payment of a Bribe or "anything of value" to a Foreign Official in order to secure improper influence over official actions that affect the Company. This prohibition is very broad and covers: (1) cash payments; (2) non-cash payments, benefits, and favors; and (3) in certain circumstances, otherwise legitimate business expenditures such as Gifts, entertainment, and hosted travel or training. The FCPA prohibits such payments whether they are made directly by the Company or its Employees, or indirectly through Foreign Intermediaries.

#### **1. Cash and Non-Cash Payments: "Anything of Value"**

- Requests by Foreign Officials for payments that would violate the FCPA arise in varied settings and can be much more subtle than a direct request for a kickback or Bribe. The FCPA prohibits the provision of "anything of value" to a Foreign Official for improper purposes, which can include:
  - Gifts;
  - Gift or sale of stock or other investment opportunities in other than an arm's length transaction for demonstrated fair market value, selling to a Foreign Official at deflated prices or buying from an official at inflated prices;

- Contracts or other business opportunities awarded to a company in which a Foreign Official holds a beneficial interest;
- Medical, educational, or living expenses; or
- Travel, meals, lodging, shopping or entertainment expenses.

## 2. Prohibited Payments

The FCPA's prohibition against improper payments to "obtain or retain business" covers virtually any improper payment made in a business context. For example, Employees or Foreign Intermediaries must not pay or give things of value to Foreign Officials, directly or indirectly, to:

- prevent some governmental action, such as the imposition of a large tax or fine, or the cancellation of an existing government contract;
- obtain a license or other authorization from a government where the issuance involves the Foreign Official's or his/her government's discretion;
- obtain confidential information about business opportunities, bids or the activities of competitors;
- obtain the right to open an office, secure a zoning ruling or to influence the award of a government contract;
- influence the rate of taxes that may apply to Intrepid's business;
- obtain relief from government controls;
- resolve governmental disputes or any commercial litigation;
- affect the nature of foreign regulations or the application of regulatory provisions; or
- secure any improper advantage.

## 3. Third Party Payments

The FCPA prohibits both direct and indirect corrupt payments to Foreign Officials. Companies can face FCPA liability based on improper payments made by its Employees, Foreign Intermediaries, or even its business partners, whether or not such company knew of the payments. For business and legal reasons, the Company's practice of fairness and professionalism must extend to the activities of the Foreign Intermediaries and business partners.

Intrepid recognizes that there are circumstances where relationships with Third Parties will be required or prudent.

### 3.1 Examples of when a Foreign Intermediary may be used to assist the Company:

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- 3.1.1 a foreign sales-related business consultant who assists the Company by facilitating introductions, persuading or negotiating with customers, or providing any other assistance to the sales function;
- 3.1.2 a foreign sales agent who acts on behalf of a Company entity as principal or independent contractor on a long-term or permanent basis, in a defined territory, and who interacts on the Company's behalf with Foreign Officials;
- 3.1.3 a foreign lobbyist who communicates with a Foreign Official about formulating legislation or a government rule, regulation or policy;
- 3.1.4 a foreign customs clearing agent who processes the transit of imported or exported goods through customs; or
- 3.1.5 a foreign financial advisor, lawyer, or consultant who interacts with Foreign Officials in connection with transactions with government entities.

3.2 The following guidelines apply to Foreign Intermediaries who perform services on Intrepid's behalf:

- 3.2.1 Foreign Intermediaries must be selected solely based on merit and may not be retained to do things that are prohibited by this Policy.
- 3.2.2 All contracts with a Foreign Intermediary must be in writing and must be reviewed and approved by the Legal Department.
- 3.2.3 Payments to a Foreign Intermediary must be in amounts that are customary and reasonable in relation to the products or services provided. Employees must ensure that all payments are properly approved and recorded in the Company's financial books and records.
- 3.2.4 Employees may make no payments in cash, to third persons, or to bank accounts that are not in the Foreign Intermediary's name. Payments may be made only in the country where the Foreign Intermediary resides/does business or where the relevant products or services are rendered.
- 3.2.5 The Legal Department will regularly review contracts with Foreign Intermediaries to ensure that the relationship complies with Company policies.
- 3.2.6 Prior to entering into a contract with any Foreign Intermediary who will act on behalf of the Company, the Company must conduct thorough due diligence. Such diligence will be conducted by Ethics and Compliance in accordance with the Company's Vetting of Third Parties Policy. As part of that Policy, Ethics and Compliance will ensure that the Foreign Intermediary also completes the requisite forms to complete the vetting process. Ethics and Compliance will

then assess the risk that a Foreign Intermediary may engage in any corrupt activities in its business dealings on behalf of the Company. Ethics and Compliance shall also institute appropriate controls to mitigate any such risks, to include additional diligence and completion by the Foreign Intermediary of an anti-bribery certification as defined in 15-01.10 Vetting of Third Parties Policy.

- 3.2.7 Ethics and Compliance must maintain the results of such due diligence resulting from the Vetting of Third Parties Policy.
- 3.2.8 Any contract with the Foreign Intermediary must contain the following provisions:
  - 3.2.8.1 a representation that the Foreign Intermediary will comply with the U.S. Foreign Corrupt Practices Act and other applicable laws;
  - 3.2.8.2 a covenant that the Foreign Intermediary has reviewed the Company's Code of Conduct, this Policy and agrees to be bound by its requirements;
  - 3.2.8.3 a provision enabling the Company to audit the Foreign Intermediary's books and records to ensure that it is abiding by all such provisions noted in this Policy;
  - 3.2.8.4 the terms of the contract may be disclosed to relevant government agencies, if deemed appropriate by the Company;
  - 3.2.8.5 the Foreign Intermediary shall not assign or subcontract work under the contract without the prior written approval of the Company;
  - 3.2.8.6 the Foreign Intermediary shall disclose to the Company any subsequent relationship between the Foreign Intermediary and a Foreign Official;
  - 3.2.8.7 at the Company's request, the Foreign Intermediary shall provide annual certifications of compliance with applicable anticorruption laws regardless of whether the Foreign Intermediary is subject to such laws; and
  - 3.2.8.8 The Company may withhold payments under the contract, or terminate the agreement, if it believes, in good faith, that the Foreign Intermediary has violated anti-corruption laws.

The Company must periodically monitor all ongoing relationships. Any questions regarding the Policy or procedures, or their applicability to proposed Third Parties, should be directed to the Legal Department.

## Monitoring and Periodic Checks

Once the relationship with a Foreign Intermediary has been established, Ethics and Compliance shall monitor the Foreign Intermediary by conducting periodic due diligence reviews. The monitoring and reviews will be reasonable and proportionate to the assessed risk of the Intermediary.

### 4. Foreign Political Contributions

Under no circumstances shall Company funds be used to make contributions to political parties or candidates in foreign countries, regardless of whether such contributions are permitted by that country's laws.

The Company does not seek to discourage or prohibit Employees who are citizens of a host country from voluntarily making personal political contributions, from participating in the political process on their own time and at their own expense, from expressing their personal views on legislative or political matters or from otherwise personally engaging in political activities in such country. However, expatriate Employees should refrain from participating in the political process in foreign countries.

## **B. United Kingdom Bribery Act of 2010 (UKBA)**

- Intrepid will conduct its business in accordance with all applicable laws, rules and regulations, including the UKBA and anti-bribery laws of those countries in which Intrepid operates. The UKBA prohibits Bribery, including:
  - Offering, promising, or giving a financial or other advantage to another person, whether a national of the United Kingdom, United States or elsewhere, with the intention of influencing or rewarding a person to perform certain functions improperly, where there is an expectation that such functions are to be performed in good faith, impartially, or in a position of trust; and
  - Requesting, agreeing to receive, or accepting a financial or other advantage from another person, regardless of nationality, intending that, in return, a relevant function or activity should be performed improperly or as a reward for the improper performance of a relevant function.
  - Acts of Bribery committed by persons "associated<sup>1</sup>" with Intrepid in order to benefit Intrepid, whether or not Intrepid knows about the Bribery.

## **C. U.S. Federal, State and Local Government Officials**

- Federal laws prohibit corruption in dealing with federal officials. These laws can be used to prosecute companies and individuals for Bribery of federal, state, county and local officials within the U.S. In addition, Bribery of state, county and local government

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<sup>1</sup> An "associated" person can be an entity or a person, and it means a third party that performs services on behalf of Intrepid, its subsidiaries or otherwise affiliated entities such as JVs, and employees of such entities.

officials typically can be prosecuted under the laws and ordinances of states and localities throughout the U.S. The laws prohibiting corruption in dealings with U.S. government officials are both extensive and complex. For this reason, Intrepid prohibits offering or providing anything of value, no matter how small or well-intended, to a U.S. federal, state or local government official absent prior written approval from the Legal Department and Ethics and Compliance Department.

## **D. Anti-Kickback Act of 1986, 41 U.S. Code, Sections 51-58 (Anti-Kickback Act)**

- Intrepid will conduct its business in accordance with the Anti-Kickback Act, which imposes criminal and civil penalties on subcontractors making payments and contractors accepting payments ("kickbacks") for the purpose of obtaining favorable treatment in awarding either a contract or subcontract relating to a prime U.S. Government contract.
- Employees are prohibited from soliciting or accepting, directly or indirectly, Bribes, Gifts, gratuities, kickbacks, fees, entertainment, commissions, or offerings for the purpose of providing favorable treatment or improperly influencing or obtaining the award of a Company/U.S. Government prime contract or subcontract pursuant to the provisions the Anti-kickback Act.
- Global Supply Chain employees who occupy a position to directly influence or actually award a subcontract or other procurement activities, will declare annually that, in the performance of their procurement duties, they did not violate anti-kickback or related procurement ethics rules.

## **E. Commercial Bribery**

- Intrepid will conduct business in accordance with state and federal laws governing commercial Bribery. Commercial Bribery is the provision or acceptance of something of value to or from a Third Party with the intent to influence the recipient to take a business action or make a business decision in contravention of their duties for their employer or other organization. Commercial Bribery is criminalized across the U.S. under state laws. Commercial Bribery also can be prosecuted under various U.S. federal statutes whether committed within or outside of the U.S. Therefore, while meals, entertainment and Gifts at times can be appropriate forms of professional courtesy in business relationships, the provision or acceptance of these items or any other thing of value are strictly prohibited by Intrepid policy when they are intended, or create an appearance of an intent, to compromise the recipient's ability to make fair and ethical business decisions, as defined in 15-03.0 Gifts and Hospitality Policy.

## **F. Anti-Money Laundering**

- Intrepid takes precautions to verify that money received is not coming from illegitimate sources. Intrepid's 110-01 Vetting of Third Parties Procedure identifies the following as red flags to scrutinize during due diligence reviews: "Unusual billing procedures are requested such as payments to Third Parties, to a shell company, unusual discounts; cash payments; payments to a numbered account (no name) or to a name different than the business; payment in a country other than where work is performed or foreign

Third Party's normal place of business, or checks made out to cash." Banking information is reviewed during the third-party vetting procedure to screen for the foregoing red flags. Third party bank account update requests are reviewed and must be approved by a member of the Ethics and Compliance department's vetting team. In addition, all foreign banks are screened through Amber Road Trade Wizard to determine if they are associated with Specially Designated Parties or other denied parties. A flag requires further investigation, documentation and approval to move forward.

#### **G. Antitrust Compliance**

- Intrepid will comply with applicable antitrust and fair competition laws wherever it does business. Using illegal or unethical competitive practices or any other unfair-dealing to obtain competitive business intelligence or gain a competitive advantage is against Company policy and in violation of antitrust laws. Compliance with all applicable laws, domestically and abroad, is a fundamental part of adhering to Intrepid's corporate values and Honor Code. No employee has the authority to engage in any conduct inconsistent with applicable antitrust laws, nor to authorize or direct such conduct by any other person, as defined in this policy.

### **7. GUIDANCE REGARDING SPECIFIC PRACTICES AND RISK AREAS**

#### **A. Code of Ethics and Business Conduct Document No. 5-01**

1. In all cases, Intrepid shall conduct business in accordance with its Code of Ethics and Business Conduct, inclusive of the Honor Code, which at times could create and even higher standard than those required by applicable U.S. and local laws.

#### **B. Meals, Entertainment and Other Expenses Related to Government Officials**

1. Meals, entertainment, Gifts, travel and other payment of expenses or things of value may not be offered to, or accepted from, any U.S. or non-U.S. government official or representative absent prior written approval from Intrepid Legal and the Ethics and Compliance department.

#### **C. Meals, Entertainment and Other Expenses Related to Other Third Parties**

1. Meals, entertainment, Gifts, travel and other payment of expenses or things of value offered to, or accepted from, any Third Party other than a government official must be directly related to Intrepid's business. Non-business related hospitality is not permitted.
2. Normal and appropriate business-related meal, entertainment, Gifts, travel or other payment of expenses or things of value includes the following elements:
  - (a) Is not intended to influence or induce a Third Party to:
    - (i) obtain or retain business or a business advantage in return for the thing of value

- (ii) reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits;
- (b) Complies with applicable and local laws;
- (c) Complies with the policies and procedures of the recipient's employer;
- (c) Does not include cash or a cash equivalent (such as Gift certificates, Gift cards or vouchers);
- (d) Must be appropriate for the circumstances;
- (e) Does not include any extravagant or inappropriate events or items, including but not limited to lavish meals or entertainment events, gambling, adult entertainment, or any Gift of more than a nominal value.
- (f) Occasional. The frequency of giving/receiving any item to or from any one individual or organization must not raise any actual or perceived conflicts of interest or impropriety;
- (g) Given openly, not secretly; and
- (h) Complies with the policies and procedures of the recipient's employer.

3. Finally, if you are offered any meal, entertainment, Gift, travel or other payment of expenses of thing of value that does not comply with this Compliance Plan, whether or not you accept the offer, you must report the offer to Intrepid's Ethics and Compliance Department or Legal Department.
4. Any question as to whether a meal, entertainment, Gift, travel, or other expense is directly related to Intrepid business as well as permissible under this Compliance Plan must be referred to Intrepid's Ethics and Compliance Department or Legal Department.

## D. Customer Travel

1. Payments or reimbursements for customer travel are not permitted.

## E. Political Contributions

1. Intrepid maintains full compliance with all laws limiting a company's ability to participate in the political process. No Intrepid funds or services, whether directly or indirectly, shall be contributed to any U.S. political organization, Government official or candidate (federal, state or local) in violation of any law and without prior approval from the Legal Department.
2. The Company will not make or authorize any sort of political donation of any kind to an official, candidate or political party outside the U.S.

## F. U.S. Charitable Contributions, Donations & Sponsorships

## G. Charitable Contributions and Donations

1. A charitable contribution or donation is a cash or in-kind payment made for the benefit of the community and may include charitable, educational, social welfare or

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similar purposes. Such payments are made without demand or expectation of business return. They are a form of corporate citizenship and responsibility.

2. Charitable contributions and donations may only be made to bonified non-profit organizations and to promote the corporate citizenship goals of Intrepid. They may not be made to individuals, labor organizations or religious institutions. Requests should be submitted in writing and approval is required from the human resources department and the Ethics and Compliance department vetting team who will verify 501(c)(3)/exemption status and run denied/excluded parties searches.

#### **H. U.S. Sponsorships**

1. A sponsorship is a cash or in-kind payment made with the purpose of associating the Intrepid brand with a particular activity or organization. Such payments are made with the expectation of a commercial benefit to Intrepid: in consideration of the sponsorship payment, Intrepid receives rights and benefits such as the use of the sponsored organization's name, advertising credits in events and publications, or use of facilities and other opportunities to promote Intrepid's name, services and products.
2. A sponsorship may not have any other purpose, for example, a sponsorship is not a political contribution (which are subject to separate Company rules, see above), nor may it be used as a means of providing a benefit to an individual.

#### **I. Non-U.S. Charitable Contributions, Donations & Sponsorships**

1. Charitable contributions may not be made at the suggestion, request, or at the behest of any Foreign Official to obtain any improper advantage or to a charity owned, controlled, or connected to a Foreign Official. Before authorizing a contribution, sufficient due diligence must be conducted to confirm that none of the money contributed by Intrepid will be paid, directly or indirectly, to or for the benefit of any Foreign Official or otherwise paid, directly or indirectly, to or for the benefit of any foreign political party, organization, or public international organization to improperly influence any Foreign Official, government employee, or candidate for public office, or any official of a public international organization, in the performance of his or her officials duties, or to obtain any improper advantage.

#### **J. Facilitating Payments**

1. Although the FCPA permits facilitating or expediting payments of money, Gifts, or other things of value to Foreign Officials, Intrepid prohibits such facilitating or expediting payments because they are illegal under the U.K. Bribery Act and the laws of many other countries.
2. What are Facilitating Payments?

3. Facilitating or grease payments are made to Foreign Officials to expedite the performance of a ***routine government action***, that a Foreign Official is already ***obligated*** to perform, as an example:
  - Obtaining permits, licenses or travel credentials/documentation
  - providing police protection
  - providing utility services
  - scheduling inspections associated with contract performance
4. Facilitating Payments do not include any decision by a Foreign Official to award new business or to continue business in any way. This type of payment is a Bribe.
5. Facilitating payments are prohibited unless prior written approval from the Chief Legal Officer is issued and supported by a detailed statement of facts and rationale, except in the event of an imminent threat to an individual's life, health or safety where prior written approval can't be obtained. Detailed information regarding such an emergency Facilitating Payment must be provided in writing to the Legal and Ethics and Compliance departments as soon as practicable after it occurs.
6. Any Facilitating Payment must be reviewed by the Legal and Ethics and Compliance departments and properly and accurately documented in the company's books and records.

## K. **Solicitation & Extortion**

1. Solicitation of a Bribe or any other thing of value by Intrepid personnel is prohibited. Extortion is a corrupt practice of trying to obtain anything of value by coercion, and it is prohibited.

## L. **Third Party Compliance and Risk Mitigation**

1. It is prohibited to do anything indirectly, i.e., via a Third Party, that it is prohibited under this policy to do directly.
2. In addition, in order to mitigate corruption risk, appropriate measures must be taken to ensure that Third Parties do not commit corrupt acts in connection with Intrepid business.

## M. **Anti-Corruption Vetting Process**

1. The vetting process for reviewing and approving a relationship with Third Parties on behalf of the Company shall be consistent with the process currently set forth in 15-01.10, Vetting of Third Parties Policy. The Company uses a risk-based approach to determine the initial level of due diligence required to assess the potential anti-corruption risk level and suitability of the relationship with a Third Party. The risk level determined by the initial review of any in-scope Third Party will

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be categorized as: Low-Light, Low, Medium or High Risk as described 15-01.10  
Vetting of Third Parties Policy.

## N. Reporting Red Flags

1. Red flags regarding Third Parties must be reported to Intrepid Ethics and Compliance department or Legal department so that appropriate guidance and direction can be provided. Red flags include, but are not limited to:
  - Commissions, tips, or other unspecified fee requests by Third Parties or government officials
  - Requests for payment in cash
  - Requests for payment to a personal bank account or to an account outside of the country in which work is performed
  - Refusal to clearly document services rendered or products provided
  - Payments or requests for payments that are not documented in a clear and transparent way
  - Charges or success fees that are unusually high or suspiciously structured
  - A recommendation from a government official to hire a particular consultant or representative
  - Family ties to a government official
  - Unnecessary Third Parties or multiple intermediaries performing the same function
  - Third Party lacks expertise to perform designated services or to provide designated product
  - Third Party simultaneously works for a government entity with which Intrepid is dealing
  - Third Party does not want to enter into a written agreement, sign an anticorruption certification, and/or resists compliance with due diligence

## O. Books, Records, and Accounts

1. It is prohibited to make any entry in the Company's books and records that conceals or disguises the true nature of the transaction; any entry that fails to provide sufficient detail of the true nature of the transaction, including the purpose of the transaction and the identity of the recipient of anything of value; and to create any "slush" funds or "off-book" accounts.

Employees and Third Parties must 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.

## 8. PROCEDURES/PROCESSES

None.

## **9. ADDITIONAL REFERENCES**

- 01-02.7 Conflict of Interest Policy
- 01-25.0 Antitrust Compliance Policy
- 5-01 Intrepid Code of Ethics and Business Conduct Handbook, 2024 Edition
- 15-01.10 Vetting of Third Parties Policy
- 15-03.0 Gifts and Hospitality Policy