

EAGLE ALLOY, INC.

CODE OF BUSINESS ETHICS AND CONDUCT

FAR 52.203-13 and FAR 52.203-14 compliant

CORE PRINCIPLES

Purpose

Eagle Alloy is committed to conducting business with honesty, integrity, and compliance with all applicable laws, regulations, and contractual requirements.

Conduct business honestly and ethically; comply with laws; protect assets; avoid conflicts of interest; report concerns; cooperate with investigations.

Compliance with Laws and Regulations

Employees shall comply with all applicable federal, state, and local laws including FAR requirements.

Business Integrity and Honest Dealings

Maintain accurate records and provide truthful information.

Government Contract Compliance

Follow contract requirements, protect government information, and accurately record labor and costs.

Anti-Bribery and Anti-Kickback Policy

Bribes, kickbacks, and improper payments are prohibited.

Conflicts of Interest

Employees must avoid personal interests that conflict with Company interests.

Protection of Information

Protect confidential, proprietary, customer, and government information.

Accurate Records and Reporting

All records must be accurate, complete, and truthful.

Workplace Conduct

Maintain a safe, respectful, and harassment-free workplace.

Reporting Suspected Misconduct

Employees are expected to report suspected violations.

Non-Retaliation

Retaliation against good-faith reporting is prohibited.

Internal Investigations

Employees must cooperate fully with investigations.

Mandatory Disclosure Requirements

The Company will comply with FAR mandatory disclosure requirements.

Ethics Awareness and Training

Employees will receive ethics and compliance training.

FAR 52.203-14 Hotline Notice

Required hotline posters will be displayed and reporting resources provided.

Discipline for Violations

Violations may result in discipline up to and including termination.

CO-PRESIDENT ACKNOWLEDGMENT

Jeff Cook, Chief Sales and Marketing Officer / Co-President

Signature: _____

Nic Tarzwell, Chief Technical Officer / Co-President

Signature: _____

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