



## Dehnco Equipment Co., Inc.

# CODE OF ETHICS FOR EMPLOYEES

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Approved by	Jeff Dehnert	CEO	V1	2/8/2025

## Definition and Scope

The Dehnco Equipment and Supplies, Inc. (“Dehnco”) Code of Ethics for employees sets out the principles that govern the behavior of employees acting in the name and on behalf of Dehnco or any conduct in their private life that may have a bearing on Dehnco’s activity. These principles apply to in-house employees of Dehnco’s (the “employees”) and contracted third parties.

## General Ethical Principles

Dehnco, Inc. will conduct business honestly and ethically wherever operations are maintained. We strive to improve the quality of our services, products, and operations and will maintain a reputation for honesty, fairness, respect, responsibility, integrity, trust, and sound business judgment. Our managers and employees are expected to adhere to high standards of business and personal integrity as a representation of our business practices, always consistent with their duty of loyalty to the Company.

All the activities of Dehnco must be ultimately focused on satisfying the needs of the individuals, in their role as customers, consumers, vendors, employees, executives, and citizens. It is essential to live by entrepreneurial ethical principles based on a behavior that strives to establish fair and transparent relations in accordance with the rules of public and private law.

**It is Dehnco’s policy to:**

- Deter the performance of illegal or unethical acts;
- Stop any illegal or unethical act as soon as it may be possibly detected; and
- Enforce relevant disciplinary sanctions.

***The following paragraphs represent the specific areas for which we consider ethical principles in the workplace to be most important.***

## Mutual Respect

All employees must behave in an honest, fair, and respectful manner in their relationships with other members of Dehnco and likewise with all third parties who may interact with it, including customers, vendors, contractors, governmental officials concerned, mass media, or any other applicable individuals and/or organizations.

All employees must avoid any action that may lead to provocation or incitement of violence of any kind, either physical or otherwise, in the workplace. In this sense, it is of the essence that all individuals conduct themselves respectfully to all company members.

All those concerned are responsible for preserving a safe and respectful working environment, free from abusive or unprofessional behavior, abiding by ethically correct and sound practices, and avoiding unbecoming situations both at the workplace and resting areas.

## Equal Treatment of Individuals

All Dehnco employees must avoid offensive behavior contrary to the law, including discrimination based on racial or ethnic origin, skin color, religion or belief, nationality, gender, age, ancestry, national origin, sexual preference, pregnancy, marital status, or physical or mental disability.

All decisions proper to the labor relationship between employees and Dehnco must be exclusively based on evaluations related to an employee's performance.

## Use of Information

All Dehnco employees must be loyal to Dehnco and avoid giving any assistance to competitors or third parties in matters contrary to the interests of Dehnco.

We expect that officers, directors, and employees will not knowingly misrepresent Dehnco, Inc. and will not speak on behalf of the Company unless expressly authorized. The confidentiality of trade secrets, proprietary information, and similar confidential commercially sensitive information (i.e., financial or sales records/reports, marketing or business strategies/plans, product development, customer lists, patents, trademarks, etc.) about the Company or operations, or that of our customers or partners, is to be treated with discretion and only disseminated on a need-to-know basis (see policies relating to privacy).

All employees must avoid the use or disclosure, either directly or indirectly, of Dehnco's proprietary information for their own benefit and/or that of third parties, except for information already in the public domain or in respect of which the express authorization from the relevant managerial level had been previously obtained.

All employees must report any attempt by third parties to obtain restricted and/or secret information to their immediate superiors. Likewise, any unauthorized use or disclosure of information by other employees should be notified, as soon as this circumstance is verified.

The term '*Organization's proprietary information*' shall be deemed to include any data, idea, concept, improvement, discovery, development, invention, or the like conceived, performed, developed, or acquired by an employee, individually or collectively, while performing tasks for Dehnco, during or after working hours and both in or outside the working environment, that may be related to Dehnco's business.

### ***Conflicts of Interest***

Employees must avoid any kind of investment, participation or association that interferes or may interfere with the discharge of their duties in furtherance of Dehnco's interests, as concerns, in particular, the following matters:

- All employees must treat vendors, customers, and any other persons doing business with Dehnco in a fair and objective manner without showing favoritism or preference based on personal considerations.
- All employees and their immediate family members must avoid accepting from vendors, customers, competitors, or any other third parties and/or delivering their gifts and/or entertainment, except as authorized under the title "Acceptance of gifts and/or entertainment" and/or "Delivery of gifts and/or entertainment."
- All employees must avoid having any direct or indirect interest in any company that competes against or intends to engage in business with Dehnco, provided that such interest may influence the performance of their tasks, in which case this circumstance should be promptly disclosed to their immediate supervisor.

## **Compliance with the Law**

All employees must comply with the laws and regulations in all areas and countries where Dehnco carries out its activities.

All employees must avoid activities that may give rise to a violation of the antitrust laws in force in those countries where Dehnco carries out commercial activities.

## Addictive Substances

All employees must avoid spreading of information, acceptance, marketing and/or use of addictive substances that may influence their typical and habitual behavior.

## Use of Dehnco Property and Services

All employees must avoid using, directly or indirectly, property and/or services of Dehnco for their own benefit and/or that of third parties unless the express authorization from the relevant managerial level has been previously obtained.

## Prohibition Against Making Deals Based on Dehnco Information

All employees must avoid making deals, for their own benefit and/or that of third parties, using property, services or securities of the Companies controlled by or related to Dehnco or companies in which it is contemplated to make deals, for as long as they have information in their possession that has not become publicly known.

Information is deemed to be known by the general public when the same has been disclosed as public information to third parties. Employees must be particularly cautious and prudent when trading in securities of controlled or related companies or of other companies that may be materially affected by Dehnco's actions. Therefore, securities may be purchased or sold at least two business days since the information became public domain.

## Accuracy and Completeness of Books and Records

Employees must ensure that all books, records and accounts of Dehnco completely, accurately and timely reflect the nature of the transactions:

- All assets, liabilities and income/losses from Dehnco's transactions must be recorded in the account books.
- The existence of funds and/or assets unrecorded or hidden for any purpose whatsoever must be avoided.
- Artificial or false accounting entries must be avoided.
- Payments and/or payment agreements intended for any party thereto to use the same for purposes other than those described in the supporting documentation must be avoided.

## Acceptance of Gifts and/or Entertainment

Neither employees nor their immediate family members are allowed to accept items, services, fees, loans or the like from any individual, entity or company as a condition for or as a result of making business deals with Dehnco, at that time or in the future.

No gifts and/or entertainment entailing sums of money or any equivalent thereof (for example, securities and shares of stock) shall be accepted, irrespective of the amount involved.

In the event such gifts and/or entertainment do not entail sums of money or any equivalent thereof, the individual receiving the gifts and/or entertainment, considering the significance thereof, must report this circumstance to his immediate superior, who must evaluate whether the same should be accepted or not.

## Delivery of Gifts and/or Hospitality

Employees may offer gifts and/or entertainment, at Dehnco's expense, to any individual, institution or company with which it has business relations, always provided that the following requirements be met:

- Gifts and/or entertainment should not entail any sums of money or the equivalent thereof, regardless of the amount involved.
- Gifts and/or entertainment should not be offered as a condition or as a result of making business deals with Dehnco, at that time or in the future.
- Gifts and/or entertainment should be reasonable and commensurate with business practices.
- Gifts and/or entertainment should be duly authorized and correctly recorded in the relevant books of account.

In appropriate and duly authorized circumstances, employees may offer entertainment, at Dehnco's expense, to any individual, institution or company with which it has business relations, always provided that such practices are not in violation of the ethical principles of Dehnco.

In the case of governmental officials, hospitality should be avoided if the same could jeopardize the integrity of such officials or Dehnco.

## Corrupt Practices and Bribery

The action of giving, offering or promising, directly or indirectly, any type of bribes, gratuities or payoffs to officials, employees or representatives of the national, provincial or municipal

governments, political parties or individuals or companies as a means to obtain any kind of business benefit is prohibited.

## Implementation of Dehnco's Code of Ethics

The responsibility to ensure effective enforcement of this Code and compliance with its provisions lies with the Chief Executive Officers (CEOs), Managers, and Functional Managers of Dehnco. Human Resources has the general responsibility for the implementation, control and enforcement of Dehnco's Code of Ethics. The Code of Ethics will be reviewed on annual basis.

### Questions, Communications, and Investigations about the Code of Ethics

In the case of questions by employees regarding the enforcement or interpretation of any provisions of this Code in connection with a particular situation, or if any violation or threatened violation of the Code comes to their knowledge, they must promptly report such circumstances to their immediate superior, as applicable, and/or as follows:

ISSUES	AREAS
Labor	HR Department
Legal – Attempted willful misconduct, theft, or fraud/corruption	President and/or Legal Counsel

Each area listed above shall start investigation proceedings with respect to all reported violations of the Code and shall periodically inform progress made in such investigations and any findings to Dehnco's CEO.

### Employee Ethics Committee

Dehnco shall have an Ethics Committee for employees made up of the individuals responsible for the Human Resources, Legal, and Operations areas and the President/Chief Executive Officer.

When necessary, the Committee shall meet to:

- Resolve issues inherent in the implementation of the Code
- Recommend improvements and/or changes in the Code.

## Acknowledgement of Receipt

All Dehnco employees must be informed of the provisions of Dehnco's Code of Ethics and must sign a statement to be appended to their personal files (see pages 10-11 of this document):

- On the date of receiving the Code
- Upon joining Dehnco to discharge duties therein
- At the time any changes or amendments are made to the Code
- Whenever it is expressly established by Dehnco.

Mention should be made in such statement that they:

- Have read and understood the Code in its entirety
- Have been allowed to ask questions about its contents
- Shall observe and comply with the provisions of the Code, and commit to:
  - Preserving the confidential nature of all information of Dehnco used in the discharge of their duties or of which they may be aware
  - Complying with the applicable regulations regulating Information Safety, and
  - Taking custody of all user accounts to access the systems provided to them for the performance of their tasks

## Compliance with the Code of Ethics

Dehnco expects that its employees will comply with respect to the provisions of its Code of Ethics.

It is our employees' responsibility to all stakeholders and the public to ensure that transactions and dealings in which they are involved are made in compliance with ethical standards and business practices. The most effective manner to discharge such responsibility is by complying with and enforcing strict compliance with this Code.

**A violation of the Dehnco Code of Ethics can result in discipline, up to and including termination of employment.** In some circumstances, the infringer may be subject to the penalties outlined in the laws and code enforced by courts of law with different competent jurisdictions such as labor, criminal, civil, tax, commercial administrative and/or international courts, as applicable.

Dehnco may take disciplinary measures in cases of *involvement in activities in violation of the Code*:



- Violation of the duty to maintain the confidentiality of information.
- Actual non-compliance with the duty to report any violation of the Code.
- Lack of cooperation in the investigation of a breach of the Code.
- Failure by any individual directly responsible for an area or sector to detect and/or report a violation of the Code by employees under his direction, provided such omission entails inappropriate supervision or lack of control.
- Retaliation against any individual for having reported violations of the Code.

## Dehnco Code of Ethics Employee Acknowledgement of Receipt

I, the undersigned, hereby confirm that:

1. I have read and understood the Dehnco Code of Ethics in its entirety.
2. I have been given the opportunity to ask questions about its contents.
3. I shall observe and comply with the provisions of the Code.
4. I will preserve the confidential nature of all information about Dehnco used in the discharge of their duties or of which they may be aware.
5. I will comply with the applicable regulations regulating Information Safety; and
6. I will take custody of all user accounts to access the systems provided to them for the performance of their tasks.

I also understand that any violation of the principles set forth in Dehnco's Code of Ethics may result in the imposition of disciplinary sanctions by Dehnco, including termination of employment and, in some circumstances, penalties set forth in the laws and codes enforced by courts of law within different competent jurisdictions such as labor, criminal, civil, tax, commercial, administrative and/or international courts, as applicable.

Dehnco may take disciplinary measures in cases of *involvement in activities in violation of the Code*:

- Violation of the duty to maintain the confidentiality of information.
- Actual non-compliance with the duty to report any violation of the Code.
- Lack of cooperation in the investigation of a violation of the Code.
- Failure by any individual directly responsible for an area or sector to detect and/or report a violation of the Code by employees under his direction, provided such omission entails inappropriate supervision or lack of control; and
- Retaliation against any individual for having reported violations of the Code.

Please sign this letter. We ask that you return a signed copy to HR along with the Code of Ethics and retain a copy of our Code of Ethics and this Acknowledgement form for your records.

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**Employee Signature**

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**DEHNCO Representative Signature**

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**Employee name**

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**DEHNCO Representative name**

**Title:**

**Title:**

**Date:**

**Date:**