

Velocity Corporate Ethics Policy

Purpose

The purpose of this Corporate Ethics Policy is to provide clear guidelines for all employees, contractors, and suppliers of Velocity to ensure that our business operations are conducted with integrity, transparency, and in full compliance with applicable laws. Our company is committed to conducting all business operations with this in mind,

Furthermore, the success of our company depends on the trust and confidence of our stakeholders, including employees, customers, suppliers, and the community. This policy establishes the foundation for ethical decision-making and ensures that all individuals associated with the company maintain the highest standards of ethical conduct. This policy addresses critical ethical issues, including fraud, money laundering, corruption, and bribery, and establishes the principles that guide our conduct across all levels of the company.

Scope

This policy applies to all employees, contractors, officers, directors, suppliers, and business partners of Velocity worldwide. It covers all aspects of the company's operations, including manufacturing, production, sales, engineering, distribution, financial management, and interactions with third parties.

Core Ethical Values

Velocity is committed to upholding the following core ethical values in all our business dealings:

- **Integrity:** Conduct business honestly and ethically, maintaining the highest standards of professional conduct.
- **Accountability:** We take responsibility for our actions and decisions, ensuring that we are transparent in our business dealings.
- **Transparency:** We are committed to openness, clear communication, and reporting in all aspects of our business operations.
- **Fairness:** Treating all individuals with respect and equality, ensuring that decisions are based on merit and impartiality.
- **Confidentiality:** We respect and protect the privacy of sensitive information
- **Compliance:** We adhere to all applicable laws, regulations, and internal policies.
- **Respect:** We promote a work environment that is respectful and free from discrimination, harassment, or retaliation.
- **Sustainability:** We strive to make decisions that contribute to the long-term health of the environment, society, and the economy.

Ethical Conduct and Professional Behavior

All employees are expected to:

- **Be Transparent:** Provide truthful and accurate information in all communications, and avoid conflicts of interest.
- **Avoid Conflicts of Interest:** Employees should avoid situations where personal interests conflict with the interests of the company. Disclose any potential conflicts to HR or management promptly.
- **Respect Company Assets:** Protect the company's physical, intellectual, and financial assets, and use them responsibly.

- **Maintain Professional Relationships:** Employees should avoid relationships or behavior that could impair their professional judgment or objectivity.
- **Commit to Equal Opportunity:** Ensure a workplace free from discrimination, harassment, and bias. All hiring, promotion, and compensation decisions should be made based on merit and fairness.

Workplace Behavior

- **Anti-Harassment:** Velocity has a zero-tolerance policy for any form of harassment, including sexual harassment, bullying, or discrimination. Every employee should treat others with respect and dignity.
- **Non-Discrimination:** Employees should be judged solely on their job performance and qualifications, regardless of race, gender, age, religion, sexual orientation, disability, or any other personal characteristic protected by law.
- **Inclusivity:** We value diversity and strive to create a workplace that is inclusive, welcoming, and respectful for all individuals.
- **Workplace Safety:** We prioritize the safety and well-being of our employees. All employees must adhere to the company's safety policies and report any unsafe conditions or behaviors.

Confidentiality and Data Protection

Employees are expected to:

- **Respect Confidential Information:** All proprietary, financial, and client-related information must be kept confidential unless authorized to share. Employees should not use this information for personal gain.
- **Protect Personal Data:** Adhere to all applicable data protection laws and respect the privacy of individuals. Ensure that sensitive data is stored, processed, and transmitted securely.

Prohibition of Fraud

Fraud, in any form, is strictly prohibited at Velocity. Fraudulent activities include, but are not limited to:

- **Misrepresentation of Financial Information:** Any intentional misstatement or omission of financial data, either internally or externally, is forbidden.
- **Falsification of Records:** Employees and contractors must not falsify, alter, or destroy company records, documents, or reports.
- **Misuse of Company Assets:** Company resources, funds, and intellectual property must not be used for personal gain or outside the scope of legitimate business purposes.

Employees must immediately report any suspected fraudulent activity to management or through the designated reporting channels.

Prohibition of Money Laundering

Velocity is committed to preventing money laundering and any related financial crimes. Money laundering involves the concealment of illegally obtained funds through legitimate business transactions.

- **Due Diligence:** Employees must perform adequate due diligence when establishing business relationships, ensuring that the sources of funds and business activities are legitimate and transparent.
- **Suspicious Transactions:** Employees must report any suspicious financial transactions or patterns that could indicate money laundering to the appropriate authority or designated compliance officer.
- **Compliance with Anti-Money Laundering (AML) Laws:** The company will comply with all applicable AML laws and regulations in the jurisdictions in which we operate, including implementing systems to detect and prevent money laundering.

Anti-Corruption and Bribery Policy

Corruption and bribery are prohibited in all business dealings. The company is committed to conducting business with honesty and integrity and does not tolerate bribery or corrupt practices.

- **Prohibition of Bribery:** Employees and business partners are prohibited from offering, soliciting, or accepting bribes, kickbacks, or any other form of improper payment to influence business decisions.
- **Gifts and Entertainment:** Offering or receiving gifts, meals, or entertainment is permissible only if it is reasonable, transparent, and in compliance with local laws and company guidelines. Any gifts or hospitality that could be perceived as attempts to influence decisions or gain favor must be disclosed.
- **Facilitation Payments:** Velocity strictly prohibits any form of facilitation payment, which refers to small, unofficial payments made to speed up or secure routine government services.
- **Third-Party Agents:** All third-party agents, including consultants, brokers, and intermediaries, must adhere to the same anti-corruption standards. Employees must perform thorough due diligence on third-party agents to ensure compliance with anti-corruption laws.
- **FCPA:** Velocity expects all employees, suppliers, vendors and business associates will adhere to the Foreign Corrupt Practices Act (FCPA) requirements.

Reporting Violations and Ethical Concerns

Velocity encourages employees, contractors, and partners to raise concerns about any unethical conduct, including suspected fraud, corruption, or violations of this policy.

- **Reporting Mechanisms:** Employees should report any violations, suspicions of unethical behavior, or concerns about compliance through the company's established channels, including HR, site management or their supervisor.
- **Whistleblower Protection:** Velocity guarantees that employees who report ethical concerns in good faith will be protected from retaliation, harassment, or adverse consequences. All reports will be investigated promptly and confidentially.
- **Non-Retaliation:** Any retaliation against an individual for reporting concerns about potential violations is strictly prohibited and will be dealt with promptly.

Enforcement and Disciplinary Action

All employees and associates of Velocity are required to comply with this Corporate Ethics Policy. Violations of this policy, including but not limited to engaging in fraud, money laundering, bribery, or corruption, will result in disciplinary action, which may include termination of employment, legal action, and reporting to appropriate authorities.

The company will ensure that violations are investigated thoroughly and fairly, and all employees involved will be given the opportunity to present their side.

Training and Awareness

To ensure understanding and compliance, all employees will receive regular training on the provisions of this Corporate Ethics Policy, including specific topics on fraud prevention, anti-money laundering, and anti-bribery practices. Additionally, all new hires will be required to review and acknowledge this policy as part of their onboarding process.

Conclusion

Velocity is committed to maintaining the highest standards of ethical behavior and compliance with the law in all of our business practices. By adhering to this Corporate Ethics Policy, we aim to protect our reputation, foster a culture of integrity, and ensure the long-term success and sustainability of our business. All employees, contractors, and business partners play an essential role in upholding these principles.