BUSINESS ETHICS & CODE OF CONDUCT

EM Automation Technologies LLC | Effective October 8, 2026

Purpose and Scope

EM Automation Technologies LLC (the "Company") is committed to honest, lawful, fair, and responsible conduct. This Code applies to owners, management, employees, and representatives acting on the Company's behalf. Subcontractors and suppliers are expected to meet comparable ethical standards while working with us.

Integrity and Compliance

We comply with applicable laws, regulations, customer requirements, and contractual obligations. We do not knowingly misrepresent qualifications, certifications, licenses, experience, services, pricing, or project status.

Anti-Bribery and Improper Payments

Bribery, kickbacks, facilitation payments prohibited by law, fraud, and other improper inducements are prohibited. No one may offer, solicit, accept, or authorize anything of value to improperly influence a business or government decision.

Conflicts of Interest

Personnel must disclose actual or potential conflicts of interest to Company leadership, including personal, family, or financial interests that could impair independent judgment. Conflicts must be reviewed and appropriately managed before proceeding.

Gifts, Hospitality, and Government Customers

Gifts, meals, travel, and entertainment must be modest, lawful, infrequent, accurately recorded, and never offered to influence decisions. Government customers and prime contractors may impose stricter rules; when in doubt, obtain management approval before offering or accepting anything of value.

Fair Competition and Procurement

We compete fairly and do not engage in bid rigging, price fixing, market allocation, improper sharing of competitors' confidential information, or deceptive procurement practices. We follow applicable solicitation rules and communicate accurately in bids and proposals.

Accurate Records, Billing, and Timekeeping

Business records, invoices, labor hours, expense reports, purchasing records, and project documentation must be complete, accurate, and timely. False entries, unsupported charges, improper cost allocation, and destruction or alteration of records to conceal misconduct are prohibited.

Confidentiality and Information Security

We safeguard customer, employee, vendor, and Company confidential information, including PLC/SCADA programs, control drawings, credentials, network information, project details, and pricing. Information is accessed and shared only for authorized business purposes, consistent with applicable agreements and security requirements.

Respectful Workplace and Safety

We support a workplace free from unlawful discrimination, harassment, retaliation, forced labor, and child labor. Employees must follow applicable workplace safety rules, site requirements, and appropriate reporting procedures, and must not perform work they are not qualified or authorized to perform.

Government Contracting

When performing public-sector or federally funded work, we comply with applicable procurement integrity, labor, wage, cybersecurity, recordkeeping, and contract requirements. Employees must promptly elevate potential noncompliance, including improper billing, conflicts, or suspected misuse of government property or information.

Reporting and Non-Retaliation

Employees and business partners may raise concerns directly with Company leadership. Good-faith reports will be considered seriously and reviewed as appropriate. Retaliation for raising concerns in good faith or participating in an investigation is prohibited. Knowingly false accusations are also unacceptable.

Accountability and Review

Leadership is responsible for communicating and applying this Code, addressing violations appropriately, and reviewing it periodically. Violations may result in corrective action, up to termination of a business relationship or employment, as permitted by law. This Code does not supersede applicable laws, contracts, or legally protected employee rights.

Management approval: Paola Courville, Chief Operating Officer (COO)
Effective date: October 8, 2026
Review: At least annually and when material requirements change