

Global Policy Statement

Evans Group brings together four trusted brands—Evans, Paktron, UTC, and Eulex—with a shared commitment to comply with all applicable laws, regulations, and ethical standards. This Global Policy Statement outlines the principles and guidelines that govern our operations worldwide, ensuring that we maintain the highest levels of integrity, transparency, and accountability. This policy applies to all employees, officers, directors, and third-party partners of Evans Group across all locations and jurisdictions where we operate. It is the responsibility of every individual within our organization to understand and adhere to these principles.

People and Culture

At Evans Group, we are deeply committed to our employees and their growth. Our cultural values—“Dream Big, Have Fun, and Get Stuff Done”—reflect our dedication to fostering a collaborative environment where every team member feels valued and empowered to contribute to our shared success. We respect each other’s individual rights and customs and strive to build a diverse and inclusive workforce. Further, all full-time employees participate as shareholders in the Company, and we conduct periodic workforce surveys to give our employee-shareholders a voice in the organization’s management, operations, and overall direction. We believe that these actions encourage a culture of responsibility, engagement, and accountability. Together, we achieve great things by supporting each other and embracing a spirit of teamwork, innovation, and continuous growth.

Environmental, Social, and Governance (ESG)

Evans Group is committed to integrating Environmental, Social, and Governance (ESG) principles into every aspect of our operations. We believe that by fostering a sustainable and ethical business model, we can drive long-term value for our stakeholders, contribute positively to society, and safeguard our planet for future generations. We are dedicated to minimizing our environmental footprint through sustainable practices and innovative solutions. We foster a diverse and inclusive workplace where all employees are valued and empowered. We implement robust policies and procedures to uphold integrity and compliance with all applicable laws and regulations and promote a culture of ethical behavior and accountability at all levels of the organization.

Compliance with Laws and Regulations

Evans Group is dedicated to full compliance with all local, national, and international laws and regulations. This includes, but is not limited to, laws related to anti-corruption, anti-bribery, competition, data privacy, labor, environmental protection, trade controls, and human rights.

Ethical Business Conduct

Evans Group is committed to upholding the highest standards of honesty, integrity, and ethical business conduct. All employees, consultants, and contractors are expected to act with integrity, honesty, and fairness in all business dealings. We expect our staff to use good judgment and to openly discuss questions with supervisors and other members of management. We do not tolerate any form of illegal or unethical behavior, and we require our business partners to adhere to similar standards.

Forced Labor and Human Trafficking

Evans Group strictly prohibits the use of forced labor, human trafficking, and any form of modern slavery in our operations and supply chains. We are committed to ensuring that all work is voluntary, and that workers are not coerced, threatened, or otherwise forced to work against their will. This includes prohibiting the retention of identity documents, withholding wages, or any other practices that restrict workers' freedom. We expect all our suppliers and business partners to comply with these principles and to take proactive steps to prevent and address any instances of forced labor within their operations. Any violation of these standards will result in immediate action, which may include termination of contracts and partnerships.

Anti-Corruption and Anti-Bribery

Evans Group strictly prohibits bribery and corruption in any form. No employee or representative of the company is permitted to offer, give, solicit, or receive any form of bribe, kickback, or other improper payment in connection with our business activities. Evans Group is comprised of US companies and is subject to the Foreign Corrupt Practices Act. We expect all employees, third parties, contractors, vendors, or anyone else with whom we engage in business transactions, to comply with these regulations and principles.

Equal Employment Opportunity

Evans Group is an Equal Opportunity employer and we do not tolerate workplace harassment or discrimination of any kind. We prohibit unlawful harassment or discrimination against and by employees, consultants, guests, and visits by employees, supervisors, managers, or third parties, including harassment based on a person's race, color, religious creed, age, sex, sexual orientation, gender, gender identity, gender expression, marital status, national origin, ancestry, medical condition, mental or physical disability, genetic information, military or veteran status, or any other characteristic protected by federal, state, or local law.

Trade Controls

Evans Group adheres to all applicable trade control laws, including export controls, sanctions, embargoes, and anti-boycott regulations. Employees involved in the sale, distribution, or transport of our products must ensure that all transactions comply with these laws. This includes conducting thorough due diligence on all transactions, verifying the legitimacy of end-users or uses, and ensuring that no products are sold or shipped to restricted or prohibited parties or uses. Additionally, Evans Group strictly prohibits participation in any boycott not sanctioned by the United States government and requires employees to report any requests to comply with such boycotts. We are committed to maintaining the highest standards of ethical conduct and integrity, fostering a culture of compliance and awareness across our organization.

Safety

Evans Group values the safety and health of our workforce and visitors. The company complies with all applicable OSHA workplace safety and health requirements. Our businesses establish safety committees whose responsibility will be identifying hazards and unsafe work practices, removing obstacles to accident prevention, and helping evaluate the company's effort to achieve an accident-and-injury-free workplace.

Data Privacy and Protection/Cyber

Evans Group companies are committed to the protection of our customer's information and are compliant with relevant DFARS cybersecurity requirements based around the NIST SP 800171 Rev 2 standard. All employees must ensure that personal data is collected, processed, and stored in accordance with applicable data protection laws and company policies. We expect our partners to follow similar practices.

CTPAT/AEO/PIP

Evans Group is committed to maintaining a secure supply chain by adhering to industry best practices and complying with all relevant security standards. We aim to align with the requirements of programs such as C-TPAT and other equivalent Authorized Economic Operator (AEO) security programs administered by foreign customs authorities. Our dedication to security ensures the protection of our partners, customers, and the integrity of our operations.

Security

Evans Group implements comprehensive security measures to protect our assets, employees, partners, and customers. Our approach includes regular risk assessments, employee training, and adherence to industry standards and regulations. We continuously work to enhance our security protocols to safeguard our business against potential threats.

Training and Awareness

Evans Group provides regular training and resources to all employees on relevant laws, regulations, and ethical standards. We also require our partners to participate in compliance training as needed.

Sustainable Business Activities

Evans Group does not directly engage in activities that harm biodiversity-sensitive areas, produce hazardous or radioactive waste, directly emit water pollutants, or involve the extraction or distribution of fossil fuels. We are committed to sustainable and environmentally responsible practices, ensuring that our operations do not negatively impact the environment or contribute to ecological degradation or contamination.

Reporting and Whistleblower Protection

Evans Group encourages employees, consultants, guests, customers, and vendors to report any concerns or violations of this policy. Evans Group provides various channels for reporting, including an anonymous whistleblower hotline. We do not tolerate retaliation against any individual who reports a concern in good faith.

Conclusion

Evans Group expects all employees and partners to uphold these standards and contribute to the integrity and success of our business. This policy will be reviewed regularly and updated as necessary to ensure continued relevance and effectiveness in maintaining our compliance commitments. Failure to comply with this policy may result in adverse action, including termination of employment or of contract. In cases where legal violations are alleged to have occurred, Evans Group and its employees will cooperate with law enforcement and regulatory authorities.