

Global Policy Statement

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Introduction

The Evans Group businesses; namely, Evans Capacitor Company, Paktron LLC, Union Technology Corp. And Eulex (hereinafter, collectively, “Evans Group”) (“Company”, “we,” “us,” “our”) is committed to conducting business in compliance with applicable laws, regulations, and ethical standards. This Global Policy Statement outlines the principles that guide our operations worldwide and reflects our commitment to integrity, transparency, accountability, and responsible business practices.

Purpose

This policy is intended to guide internal practices, provide transparency, and supplement our contractual terms and conditions to customers, partners, and other stakeholders regarding our approach to compliance and ethical conduct. It does not replace or supersede the terms of any applicable agreement.

Scope

This policy applies to employees, officers, directors, contractors, agents, and third-party partners acting on behalf of the Company across all locations and jurisdictions in which we operate.

When this policy is shared with or referenced by customers, suppliers, or other third parties, it applies only to the extent relevant to the activities performed under the applicable agreement and in a manner consistent with that agreement. Certain provisions apply primarily to internal operations and are included for transparency when this policy is made publicly available.

People and Culture

We are committed to fostering a collaborative, inclusive, and respectful workplace. Our cultural values emphasize ambition, teamwork, and execution, and reflect our belief that engaged and empowered teams drive long-term success. We respect individual rights and customs and strive to maintain a diverse and inclusive workforce. Where applicable, employees may participate in equity or incentive programs offered by the Company. We also encourage open communication and engagement to support accountability, continuous improvement, and shared success.

Environmental, Social, and Governance (ESG)

We integrate Environmental, Social, and Governance (ESG) considerations into our business practices. We seek to operate sustainably, promote ethical conduct, support our workforce, and comply with applicable laws and regulations. Our approach is designed to support long-term value creation while contributing positively to our communities and stakeholders.

Compliance with Laws and Regulations

We are committed to complying with applicable local, national, and international laws and regulations, including those relating to:

- Anti-corruption and anti-bribery
- Competition and antitrust
- Data privacy and information security
- Labor and employment
- Environmental protection
- Trade controls, export controls, sanctions, and embargoes

- Human rights and modern slavery
- Financial integrity and applicable securities and capital-markets laws

Ethical Business Conduct

We expect all individuals acting on our behalf to conduct business with honesty, integrity, and professionalism. Illegal or unethical behavior, including bribery, corruption, fraud, misrepresentation, or abuse of authority, is not tolerated. We encourage individuals to raise questions, seek guidance, and report concerns when appropriate.

Forced Labor and Human Trafficking

We prohibit the use of forced labor, human trafficking, and all forms of modern slavery in our operations and supply chains. All work must be voluntary, and workers must not be coerced, threatened, or restricted through practices such as the retention of identity documents or unlawful withholding wages.

We expect suppliers and business partners to take reasonable steps to prevent and address forced labor risks. Where violations are identified, appropriate corrective action may be taken, up to and including termination of the business relationship, consistent with applicable law and contractual arrangements.

Anti-Corruption and Anti-Bribery

Bribery and corruption in any form are prohibited. No employee or representative may offer, give, solicit, or receive improper payments, kickbacks, or other benefits intended to influence business decisions. We expect compliance with applicable anti-corruption laws by all parties acting on our behalf.

Competition and Fair Dealing

We are committed to fair and lawful competition. Anti-competitive conduct, including price fixing, bid rigging, market allocation, or abuse of market position, is prohibited.

Financial Integrity and Accurate Records

We are committed to maintaining accurate, complete, and transparent books and records in accordance with applicable laws, regulations, and accounting standards. Transactions must be recorded honestly and fairly, and false or misleading entries are not permitted.

Securities Laws and Confidential Information

Where applicable, we are committed to complying with securities and capital-markets laws relevant to our business activities. We take appropriate steps to protect confidential and non-public information and expect individuals acting on our behalf to handle such information responsibly and in accordance with applicable legal requirements.

Engaging in transactions based on confidential or non-public information in violation of applicable law is prohibited.

Conflicts of Interest

Individuals acting on our behalf are expected to avoid situations where personal interests conflict, or reasonably appear to conflict, with the interests of the Company. Actual or potential conflicts should be disclosed and addressed in accordance with applicable laws and internal policies.

Trade Controls

We comply with applicable export controls, sanctions, embargoes, and anti-boycott regulations. We do not knowingly engage in transactions involving restricted parties, prohibited end uses, or unauthorized destinations and expect adherence to these requirements in all applicable activities.

Safety

We value the safety and health of our workforce and visitors. We comply with applicable workplace safety and health laws and seek to maintain safe working environments through proactive risk identification and prevention efforts.

Data Privacy and Information Security

We are committed to protecting customer, employee, and partner information. Personal data is collected, processed, and stored in accordance with applicable data protection laws and reasonable security practices. Where applicable, we align our cybersecurity approach with recognized standards and contractual requirements.

Supply Chain Security

We are committed to maintaining a secure and resilient supply chain. We align with industry best practices and, where applicable, recognized supply-chain security frameworks to safeguard our operations and partners.

Training and Awareness

We provide training and resources to promote awareness of legal and ethical responsibilities. Certain partners may be required to acknowledge or comply with applicable compliance requirements as a condition of engagement.

Reporting and Whistleblower Protection

We encourage employees, partners, customers, and other stakeholders to report concerns or suspected violations of this policy. Reporting channels are available, including confidential or anonymous options when permitted by law. Retaliation against individuals who raise concerns in good faith is not tolerated.

Conclusion

We expect all employees and partners to uphold these standards and contribute to a culture of integrity, responsibility, and lawful conduct. This policy is reviewed periodically and may be updated to reflect changes in laws, regulations, or business practices. Unless otherwise agreed in writing, updates to this policy do not amend existing agreements. Violations of this policy may result in appropriate disciplinary or corrective action, consistent with applicable law and contractual arrangements, up to and including termination of employment or business relationships. Where required, we will cooperate with regulatory or law enforcement authorities.

Colin McClennan

Colin McClennan
Vice President
Evans Group (Evans, Paktron, UTC, Eulex)
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