

## Anti-Bribery and Corruption Policy

ALG Diversified and its subsidiaries, representatives, and agents (collectively, “Company”) are committed to conducting business ethically and in compliance with all applicable laws. This Anti-Bribery and Corruption Policy establishes principles that must govern our conduct in order to: a) conform to the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and similar anti-corruption laws worldwide and b) more broadly, reinforce our intention and obligation to act honestly and ethically in all of our business dealings.

Bribery and corruption are not only against our Company values; they are illegal and can expose both the employee and the Company to fines and penalties, including imprisonment and reputational damage.

Bribery is never permitted. We will not seek to influence others, either directly or indirectly, by offering, paying, or receiving bribes or kickbacks, or by any other means that is considered unethical, illegal, or harmful to our reputation for honesty and integrity. Employees, representatives, and agents of the Company are expected to decline any opportunity which would place our ethical principles and reputation at risk. While certain laws apply only to bribes to government officials (domestic and foreign); this Policy applies to non-government business partners as well.

Bribery is offering, giving, or receiving anything of value with the intention of inducing a person to act or to reward a person for having acted. It is important to understand that a corrupt act has occurred even if:

- A bribe does not succeed.
- A person authorizes or provides direction for a bribe, but no bribe is ultimately offered or paid.
- “Anything of value” includes, but is not limited to:
  - Cash, cash equivalents (such as gift certificates/cards), stock, personal property and assumption or forgiveness of a debt.
  - Gifts, meals, entertainment, and travel—Any corporate travel, gifts, entertainment, and meals must be proportionate to the occasion.
  - Political contributions.
  - Charitable contributions—if made to a charity at the direct request of a government official or private business partner, it could be considered an indirect bribe made in order to obtain or retain business or to secure other improper business advantage.
  - Job offers or internship awards—offers to Government Officials (or their relatives) can present a risk of violating anti-bribery or anticorruption laws and regulations. Compliance must be consulted prior to making such offers.

Corruption is dishonest or fraudulent conduct by those in power, typically involving bribery.

Companies cannot avoid liability by using a third party to give or receive a bribe. A third party includes, but is not limited to consultants, agents, representatives, subcontractors, and subadvisors.

Generally:

- Employees, contractors, and affiliates **MUST NOT** provide or offer to provide a payment or other incentive to anyone in exchange for gaining any sort of improper benefit. A payment or other incentive can be anything of value, not just cash, but also Business Gifts, services, job offers, loans, travel expenses and entertainment. A Business Gift is anything of value given or received from clients and others the Company does business with as the result of a business relationship, for which the recipient does not pay fair market value. Employees, contractors, and affiliates **MUST NOT** offer anything of value in an attempt to improperly influence any person, regardless of whether they are in the private or public sector or are a government official. In addition, employees, contractors, and affiliates **MUST NOT** accept anything of value in order to provide an improper benefit.
- The Company prohibits facilitation payments or “grease payments” offered to a person in government or other individual to secure or speed up a routine, discretionary government process or decision, such as expediting a license or permit.
- These rules apply to actions by third parties on the Company’s behalf to the same extent that the rules apply to actions of employees, contractors, and affiliates.
- All financial records **MUST** accurately reflect the substance of all transactions by or on behalf of the Company, regardless of the size of the transaction.

We must clearly convey to third parties representing the Company that we expect them to comply with our Bribery and Corruption Policy. In some jurisdictions, the Company can be convicted of a criminal offense if it fails to prevent bribery carried out on its behalf by a third party even if no one in the Company had actual knowledge of the bribe.

Whenever the Company seeks to engage a third party in which the third party may interact with a Government Official for or on behalf of the Company, due diligence should be performed to ensure that the third party is a bona fide and legitimate entity; is qualified to perform services for which it will be retained; and maintains standards consistent with the legal, regulatory, ethical, and reputational standards of the Company.

Laws and regulations are strict when dealing with Government Officials. Reasonable corporate hospitality that is acceptable with other business associates might not be allowable when Government Officials are involved. Before such expenses are incurred, obtain approval from management.

- A Government Official is any:
  - individual elected or appointed to a governmental entity,
  - official or employee of a government,
  - official or employee of a company wholly or partially controlled by a government (such as state-owned companies),
  - candidate for political office,
  - political party or official of a political party, or
  - person acting in an official capacity for any of the above regardless of rank or position.

The definition of what could constitute a bribe to a Government Official is broad and can occur even when the benefit being offered is small, such as gifts, entertainment and even business meals.

Some laws allow expenses which relate to reasonable and bona fide travel, accommodation, and meal expenses in connection with a contract between the Company and the third party, or the demonstration of Company capabilities relating to proposed business with the third party.

“Facilitation or grease payments” are payments that facilitate a normal governmental function, such as to expedite processing paperwork. While these types of payments may be accepted as “a cost of doing business” in some cultures, they are illegal and counter to our values. They are not allowed under the UK Bribery Act, and they are prohibited by this policy.

**Reporting violations: Employees and representatives should seek clarification on any questions or concerns regarding activities under consideration or the interpretation of any law. Employees and contractors who learn of a violation or suspected violation are REQUIRED to take immediate action. If an employee or contractor suspects a violation of the law or Company policy, it is their duty to report this wrongdoing by contacting their manager without delay. Managers notified of a violation or suspected violation MUST promptly escalate the matter to their immediate superior for resolution. The Company does not tolerate any retaliation against anyone who, in good faith, reports a violation or cooperates with an investigation.**