

Business Ethics Policy

At Ni-Met Inc, we are dedicated to operating with the highest standards of ethics, integrity, and transparency. Our business is founded on principles of responsible recycling, environmental stewardship, and fair dealings with all stakeholders. This Business Ethics Policy defines the framework under which our employees, contractors, and partners must conduct themselves.

Scope

This policy applies to all employees, contractors, suppliers, and business partners of Ni-Met Inc, regardless of location. It governs all aspects of business behavior including operations, procurement, sales, supply chain, and client relations.

1. Anti-Bribery and Corruption

We prohibit all forms of bribery and corruption, whether direct or indirect. Ethical decision-making must underpin all business activities.

Qualitative Objectives:

- Maintain a zero-tolerance policy towards bribery and corruption.
- Provide clear guidance and annual training on anti-bribery and corruption.
- Implement and maintain a confidential whistleblower system.
- Restrict the giving or receiving of gifts that may be perceived as improper influence.

Quantitative Targets:

- 100% of employees complete annual anti-bribery training by 2026.
- Zero confirmed incidents of bribery or corruption.
- All whistleblower reports to be investigated within 30 days.

2. Conflict of Interest

All personnel must act in the best interest of Ni-Met Inc and avoid situations where personal interest could compromise objectivity or integrity.

Qualitative Objectives:

- Ensure all employees disclose potential or actual conflicts of interest.
- Decisions must be based on the company's best interest, not personal gain.
- Annual training on recognizing and managing conflicts of interest.

Quantitative Targets:

- 100% completion rate for conflict-of-interest disclosure forms.
- Zero unresolved conflict of interest incidents beyond 60 days.

3. Fraud Prevention

Ni-Met Inc enforces strict controls to detect and prevent fraud across all areas of operation.

Qualitative Objectives:

- Maintain a fraud detection framework with regular audits and reporting.
- Provide staff with fraud prevention training and anonymous reporting tools.
- Take immediate action upon detection of fraud.

Quantitative Targets:

- 100% of employees trained in fraud prevention annually by 2026.
- Target a 100% reduction in reported fraud cases by 2026
- Investigate all fraud reports within 30 days

4. Anti-Money Laundering (AML)

We comply with all applicable AML regulations to ensure our operations are not used for illegal financial activities.

Qualitative Objectives:

- Conduct due diligence to verify the identity and legitimacy of customers and suppliers.
- Offer annual AML training for relevant employees.
- Cooperate with regulatory and enforcement authorities.

Quantitative Targets:

- 100% AML training completion for relevant employees.
- 100% compliance with AML procedures for all clients/suppliers.
- Two internal AML audits per year with >95% detection rate of suspicious transactions.

Allocation of Responsibility

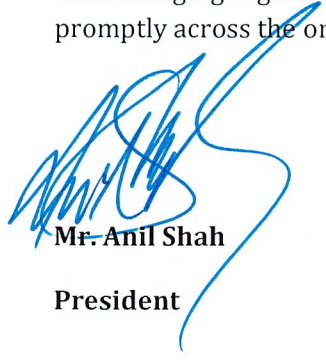
The Compliance Officer of Ni-Met Inc is responsible for the enforcement of this policy.

Department heads are accountable for implementation within their teams.

Ethics and compliance training will be conducted annually, and reporting mechanisms will remain open and anonymous.

Policy Review

This policy shall be reviewed annually by the Compliance Department to ensure alignment with changing regulations and evolving best practices. Any updates will be communicated promptly across the organization.

A large, stylized handwritten signature in blue ink, appearing to read "Anil Shah".

Mr. Anil Shah

President

