

Anti-Corruption Commitment Statement

Penn Engineering Components, Inc. is committed to conducting business ethically, honestly, and in compliance with all applicable anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and other applicable domestic and international laws prohibiting bribery and corruption.

This commitment is fulfilled through:

- Prohibiting the offer, promise, payment, or authorization of anything of value to any government official, customer, or business partner for the purpose of improperly obtaining or retaining business or securing an improper advantage.
- Prohibiting facilitation payments intended to expedite routine governmental action.
- Requiring that gifts, meals, and entertainment provided or received in connection with our business be reasonable, infrequent, and never intended to improperly influence a business decision.
- Performing risk-based due diligence on agents, distributors, and other third parties acting on our behalf in connection with sales or business development.
- Maintaining accurate books, records, and accounts that reflect our transactions in reasonable detail.
- Providing employees with guidance and training appropriate to their role in identifying and avoiding corruption risk.
- Maintaining a channel for employees and business partners to report suspected violations without fear of retaliation.
- Investigating reported concerns and taking appropriate corrective action, up to and including termination of the business relationship or employment, where violations are confirmed.

This statement applies to all Penn Engineering Components, Inc. employees, officers, and directors, and to agents and third parties acting on our behalf. Questions or concerns may be directed to Quality department at quality@pennengineering.com.

[Signature]

[Name]

[Title — e.g., President / CEO]

Penn Engineering Components, Inc.

Effective Date: *[Effective Date]*

Last Reviewed: *[Last Reviewed Date]*