



Cal-Aurum Industries Code of Ethics and Conduct

(Effective: April 20, 2026)

Our Policy

It is the policy of Cal-Aurum Industries ("CAI") to conduct all business affairs in accordance with applicable laws and to be a good corporate citizen. This policy applies to all employees, officers, and directors of CAI.

Anti-Corruption and Fair Business Practices

Anti-Corruption & FCPA: CAI strictly prohibits any form of bribery, kickbacks, or improper payments in exchange for business advantages. We comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA).

Fair Competition: CAI competes fairly and honestly to ensure our services are provided on their merits. We use only lawful means to obtain competitive information.

Advertising and Marketing: CAI is committed to fair business and advertising practices, delivering superior services to its customers without engaging in deceptive behavior.

Export Controls and Economic Sanctions

ITAR Compliance: As an ITAR-registered organization, CAI is committed to the highest standards of export compliance.

Adherence to Manual: All employees must strictly adhere to the protocols outlined in ITAR-001: Compliance Manual regarding the handling of technical data and defense articles.

Licensing and Registration: CAI maintains active registration with the Directorate of Defense Trade Controls (DDTC) and ensures all necessary licenses or approvals are obtained prior to any export-related activities.

Conflicts of Interest

Avoidance and Disclosure: Employees are required to avoid business decisions or outside activities that create an actual or potential conflict of interest with their duties to CAI.

Reporting: Employees must seek guidance from CAI officials prior to engaging in behavior that could be considered a potential conflict.

Supply Chain Transparency: Per customer requirements, CAI will disclose potential conflicts of interest, including personal or financial relationships between CAI employees and those of our customers

Protection of Intellectual Property and Data

Intellectual Property (IP): CAI protects the intellectual property and proprietary nature of its own data and the data of others disclosed to us in confidence.

Disclosure of Information: We are committed to the privacy of data entrusted to us, including data provided by customers and Business Partners. Such information is protected in accordance with legal and contractual requirements.

Financial Integrity: Each employee is responsible for the accurate recordkeeping and reporting of financial data to ensure the integrity of CAI's records.

Human Rights, Diversity, and Environment

Human Rights: CAI supports the protection of international human rights and the eradication of slavery, human trafficking, forced labor, and child labor.

Non-Discrimination: CAI employees must respect diverse cultures and must not discriminate based on age, disability, ethnic origin, gender, race, religion, or sexual orientation.

Environmental Responsibility: CAI promotes environmental responsibility and encourages the development of environmentally friendly technologies and processes.

Accountability and Whistleblowing

Reporting Misconduct: CAI employees have an obligation to report unethical business conduct, violations of this Code, or any illegal actions.

Whistleblower Protection: CAI strictly prohibits retaliation against any employee or individual who, in good faith, reports a suspected violation of the law or this Code.

Disciplinary Action: All employees are required to comply with this Code; failure to do so will result in appropriate disciplinary action.

8. Business Partners and Suppliers

High Standards: CAI uses only authorized business partners who meet or exceed CAI's high standards.

Flow-down Requirements: We strongly encourage our suppliers and subcontractors to comply with this Code. Upon request, suppliers must provide information or allow access to verify compliance with these standards.