



SIMA POLICY

It is the policy of Sovereign International Metals and Alloys, Inc. that its employees uphold the highest standards of ethical, professional behavior. They shall dedicate themselves to carrying out the mission of this organization and shall:

- 1) Hold the safety, health and welfare of the public in the performance of professional duties as their primary mission.
- 2) Act in such a manner as to uphold and enhance personal and professional honor, integrity and the dignity of the business.
- 3) Treat with respect and consideration all persons, regardless of race, religion, gender, sexual orientation, maternity, marital or family status, disability, age or national origin.
- 4) Engage in carrying out SIMA's mission in a professional manner.
- 5) Collaborate with and support other professionals in carrying out SIMA's mission.
- 6) Build professional reputations on the merit of services and refrain from competing unfairly with others.
- 7) Accept as a personal duty the responsibility to keep up to date on emerging issues and to conduct themselves with professional competence, fairness, impartiality, efficiency, and effectiveness.
- 8) Demonstrate the highest standards of personal integrity, truthfulness AND honesty in all activities in order to inspire confidence and trust in such activities including being a good community partner.
- 9) Avoid any interest or activity that is in conflict with the conduct of their official duties. This includes:
 - A strict policy that prohibits bribery, or giving anything of value or money to any government official
 - No receipt or payment of funds, property, service or anything else of value shall be made by SIMA if it will be used for any unlawful purpose.
 - Shall not provide gifts, entertainment or favor that may obligate or appear to obligate our customer or supplier
 - Shall not provide gifts, entertainment that are unlawful, out of customary business related transactions, and cannot be viewed as a bribe or payoff
- 10) Respect and protect privileged information to which they have access in the course of their official duties. This includes:
 - Gathering company information legally
 - Do not share confidential information from supplier or customers with anyone outside of SIMA without written approval
 - Respect intellectual properties of our suppliers and customers

Signed:

Position: President

This revision dated: January 8, 1996, Rev 1