



Anti-Bribery, Corruption, and Ethics Policy MIGS® / Polyfuze™

PURPOSE:

Mold In Graphic Systems® / Polyfuze™ Graphics Corporation (aka "Company") prohibits any improper or unethical payment to government officials or a party to a private commercial transaction anywhere in the world by any company employee. This anti-bribery, corruption, and ethics policy is designed to comply with the requirements of the U.S. Foreign Corrupt Practices Act (the "FCPA"), the U.K. Bribery Act of 2010 (the "U.K. Bribery Act"), and the anti-bribery laws of those other jurisdictions in which we do business. These laws generally prohibit bribes, kickbacks, or illegal payments to influence business transactions and require the Company to maintain accurate books and records and a system of internal controls.

Company employees will maintain the highest ethical standards in the conduct of Company affairs. Intent of this policy is that each employee will conduct the Company's business with integrity and comply with all applicable laws in a manner that excludes considerations of personal advantage or gain.

The following is a summary of the Company's policy with respect to (1) gifts, favors, entertainment, and payments given or received by Company employees, (2) potential conflicts of interest and (3) certain other matters:

GENERAL POLICY APPLICATION:

No employee, representative, consultant, contractor, or anyone acting on behalf of the Company has the authority to offer, promise, give, or authorize payments of money or anything else of value, whether directly or indirectly, to a government official or a participant in a private commercial transaction to improperly induce that person to affect any act or decision, to do or omit to do any act in violation of their duty, or to secure an improper advantage in a manner that will assist the Company or any of its subsidiaries or divisions, or any of its employees, agents, or anyone else to obtain or retain business ("prohibited payments").

Every employee of the Company and agent has the obligation to record accurately and fairly all of their transactions involving any expense of the Company or any other transaction involving the disposal or transfer of the Companies assets, including submitting and keeping accurate supporting documentation.

In addition to direct payments of money, other examples of prohibited payments include the following bade at the direction, or for the benefit, of a government official or a commercial business partner.

Gifts, Favors, and Payments by the Company:

Gifts, favors, and payments may be given to others at Company expense, if they meet all of the following criteria:

1. They are consistent with accepted business practices
2. They are of sufficiently limited value and in a form that will not be construed as a bribe or payoff
3. They are not in violation of applicable law and generally accepted ethical standards; and
4. Public disclosure of the facts will not embarrass the Company

Payments, commissions, or other compensation to or for the benefit of employees of customers (or their family members) not required by written contract are contrary to Company policy.



Anti-Bribery, Corruption, and Ethics Policy MIGS® / Polyfuze™

Gifts, Favors, Entertainment and Payments Received by Company Employees:

1. Employees shall not seek or accept for themselves or others any gifts, favors, entertainment, payments without a legitimate business purpose nor shall they seek or accept personal loans other than conventional loans at market rates from lending institutions) from any persons or business organizations that do or seek to do business with or is a competitor of the Company. In the application of this policy:

a. Employees may accept for themselves and members of their families common courtesies usually employed with customary business practices. These include but are not limited to:

Lunch and/or dinner with vendors sometimes including spouses as long as the invitation is extended by the vendor.

Gifts of small value from vendors such as calendars, pens, pads, etc.

Tickets to events (such as sports, arts, etc.) are acceptable if offered by the vendor and the vendor accompanies the employee to the event. These are not to be solicited by the company employee and must be approved by the appropriate company officer.

Overnight outings are acceptable under the condition that individuals from either other companies or the vendor are in attendance. The employee must have prior approval from the appropriate company officer.

The receipt of alcoholic beverages is discouraged.

Gifts of perishable items usually given during the holidays such as hams, cookies, nuts, etc., are acceptable.

b. A strict standard is expected with respect to gifts, services, discounts, entertainment, or considerations of any kind from suppliers

Day outings such as golf, fishing, and hunting are acceptable with prior approval from the appropriate company official. The vendor must be in attendance and participation by the employee's family members is not acceptable.

Use of vendor's facilities (vacation homes, etc.) by employees or families for personal use is prohibited. In the event the vendor is present for the duration of the visit such a situation is acceptable as long as it is only once per year and for limited duration, i.e. a long weekend. The employee must have prior approval from the appropriate company officer.

It is never permissible to accept a gift in cash or cash equivalent such as stocks or other forms of marketable securities of any amount.

2. Management employees should not accept gifts from those under their supervision of more than limited value.

Conflicts of Interest:

Employees should avoid any situation which involves or may involve a conflict between their personal interest and the interest of the Company. As in all other facets of their duties, employees dealing with customers, suppliers, contractors, competitors, or any person doing or seeking to do business with the company are to act in the best interest of the company. Each employee shall make prompt and full disclosure in writing to their manager of any potential situation which may involve a conflict of interest. Such conflicts include:



Anti-Bribery, Corruption, and Ethics Policy MIGS® / Polyfuze™

1. Ownership by employee or by a member of their family of a significant interest in any outside enterprise which does or seeks to do business with or is a competitor of the company.
2. Serving as a director, officer, partner, consultant, or in a managerial or technical capacity with an outside enterprise which does or is seeking to do business with or is a competitor of the company. Exceptions to this can be approved by the President/Chief Executive Officer of the Company.
3. Acting as a broker, finder, go-between or otherwise for the benefit of a third party in transactions involving or potentially involving the Company or its interests.
4. Any other arrangements or circumstances, including family or other personal relationships, which might dissuade the employee from acting in the best interest of the company.

Confidential Information:

The revelation or use of any confidential product information, data on decisions, plans, or any other information which might be contrary to the interest of the Company without prior authorization, is prohibited. The misuse, unauthorized access to, or mishandling of confidential information, particularly personnel information, is strictly prohibited and will subject an employee to the Discipline Policy up to and including immediate discharge.

Scope:

This policy extends to the Company's operations anywhere in the world, including all subsidiaries, divisions, or agents, as well as to any joint venture, consortium or other business enterprise in which the Company is a participant. This policy is applicable to all employees and agents in performing the Company's business, as well as in connection with any corporate and business unit programs, events, campaigns, and other initiatives.

Compliance:

Any violation of this policy will subject the employee to Administrative disciplinary action or immediate discharge. Any Company employee having knowledge of any violation of the policy shall promptly report such violation to the appropriate level of management. Each vice president and company officer of the Company is responsible for compliance in their area of responsibility. When questions arise concerning any aspect of this policy, contact Human Resources.