

## Passport Corp Ethics Policy

### Version: 3.0

#### Revision History:

Version	Date	Change Description	Changed By
1.0	1/23/2020	Initial Version	Allen Ampel
2.0	3/31/2021	Annual Review	Allen Ampel
3.0	2/22/2022	Annual Review	Allen Ampel

### 1. Overview

Passport Corporation is committed to protecting employees, partners, vendors and the company from illegal or damaging actions by individuals, either knowingly or unknowingly. When Passport Corporation addresses issues proactively and uses correct judgment, it will help set us apart from competitors.

Passport Corporation will not tolerate any wrongdoing or impropriety at any time. Passport Corporation will take the appropriate measures act quickly in correcting the issue if the ethical code is broken.

### 2. Purpose

The purpose of this policy is to establish a culture of openness, trust and to emphasize the employee's and consumer's expectation to be treated to fair business practices. This policy will serve to guide business behavior to ensure ethical conduct. Effective ethics is a team effort involving the participation and support of every Passport Corporation employee. All employees should familiarize themselves with the ethics guidelines that follow this introduction.

### 3. Scope

This policy applies to employees, contractors, consultants, temporaries, and other workers at Passport Corporation, including all personnel affiliated with third parties.

### 4. Policy

#### 4.1 Executive Commitment to Ethics

- 4.1.1 Senior leaders and executives within Passport Corporation must set a prime example. In any business practice, honesty and integrity must be top priority for executives.

4.1.2 Executives must have an open door policy and welcome suggestions and concerns from employees. This will allow employees to feel comfortable discussing any issues and will alert executives to concerns within the work force.

4.1.3 Executives must disclose any conflict of interests regard their position within Passport Corporation.

#### 4.2 Employee Commitment to Ethics

4.2.1 Passport Corporation employees will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.

4.2.2 Every employee needs to apply effort and intelligence in maintaining ethics value.

4.2.3 Employees must disclose any conflict of interests regard their position within Passport Corporation.

4.2.4 Employees will help Passport Corporation to increase customer and vendor satisfaction by providing quality products and timely response to inquiries.

4.2.5 Employees should consider the following questions to themselves when any behavior is questionable:

- Is the behavior legal?
- Does the behavior comply with all appropriate Passport Corporation policies?
- Does the behavior reflect Passport Corporation values and culture?
- Could the behavior adversely affect company stakeholders?
- Would you feel personally concerned if the behavior appeared in a news headline?
- Could the behavior adversely affect Passport Corporation if all employees did it?

#### 4.3 Company Awareness

4.3.1 Passport Corporation will promote a trustworthy and honest atmosphere to reinforce the vision of ethics within the company.

#### 4.4 Maintaining Ethical Practices

4.4.1 Passport Corporation will reinforce the importance of the integrity message and the tone will start at the top. Every employee, manager, director needs consistently maintain an ethical stance and support ethical behavior.

4.4.2 Employees at Passport Corporation should encourage open dialogue, get honest feedback and treat everyone fairly, with honesty and objectivity.

#### 4.5 Unethical Behavior

4.5.1 Passport Corporation will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.

- 4.5.2 Passport Corporation will not tolerate harassment or discrimination.
- 4.5.3 Unauthorized use of company trade secrets & marketing, operational, personnel, financial, source code, & technical information integral to the success of our company will not be tolerated.
- 4.5.4 Passport Corporation will not permit impropriety at any time and we will act ethically and responsibly in accordance with laws.
- 4.5.5 Passport Corporation employees will not use corporate assets or business relationships for personal use or gain.

#### 4.6 Reporting of Unethical Behavior

- 4.6.1 Anyone wishing to report observed unethical behavior should report to their direct supervisor, the CEO, or our Office Manager. All contact will be kept confidential

## 5. Policy Compliance

### 5.1 Compliance Measurement

Management will verify compliance to this policy through various methods, including but not limited to tracking feedback and maintaining records of any reported breach and the resulting actions taken.

### 5.2 Exceptions

None.

### 5.3 Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

## 6 Related Standards, Policies and Processes

None.

## 7 Definitions and Terms

None.