

F.M. Nelkin, LLC - Code of Conduct

Version : 2

Purpose:

This Code of Conduct sets forth expectations for ethical business practices, compliance with laws, and the values that guide behavior across all roles and levels at F.M. Nelkin, LLC. It is intended to ensure all personnel maintain the highest standards of professionalism and integrity.

Scope:

This Code applies to all employees, contractors, consultants, interns, suppliers, and business partners who represent or work with F.M. Nelkin, LLC.

Contents:

1. Ethical Behavior, Honesty, and Transparency

All employees must act with honesty, integrity, and fairness. Business decisions must be made objectively, free from bias or personal interest. Transparency in all communications and recordkeeping is required to maintain trust.

2. Anti-Corruption, Anti-Bribery, and Fair Competition

F.M. Nelkin, LLC maintains a zero-tolerance policy towards bribery, kickbacks, and any form of corruption. Employees are prohibited from offering or accepting anything of value to influence business decisions. We are committed to conducting business fairly and in compliance with all antitrust and competition laws.

3. Respect for Human Rights and Nondiscrimination

We uphold the dignity, rights, and fair treatment of all individuals. Discrimination based on race, gender, age, religion, disability, sexual orientation, or any other protected status is not tolerated. All employees are entitled to a respectful, inclusive, and harassment-free workplace.

4. Commitment to Environmental Sustainability

F.M. Nelkin, LLC is dedicated to reducing our environmental impact through responsible sourcing, minimizing waste, conserving energy, and complying with all applicable environmental laws and standards.

5. Mechanisms for Reporting Misconduct

Employees are encouraged to report any concerns related to unethical behavior or Code violations. Reports can be made confidentially via our hotline or email at (insert confidential hotline/email). All reports will be taken seriously and investigated thoroughly.

6. Non-Retaliation for Whistleblowers

F.M. Nelkin, LLC strictly prohibits retaliation against any employee who, in good faith, reports misconduct or cooperates in an investigation. We are committed to protecting the rights of whistleblowers and fostering a culture of accountability and transparency.

Acknowledgment:

All employees must review and acknowledge this policy annually. Signing this Code confirms that you understand and agree to abide by its principles.

Created By:

David Moore

Signature

[Signature]

Date:

4/10/26

Endorsed By:

Kaitlin Cain

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4/10/26

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