POLICY OVERVIEW

Indium Corporation is committed to abide by the spirit and responsibilities as prescribed in our CODE OF ETHICS. This ethics escalation (whistleblowing) policy is meant to encourage individuals working for or with the company to report any unethical practices at any level of the organization with complete comfort, confidence, and protection.

If something is bothering you and you think Indium Corporation’s management should know, please refer to this policy.

UNETHICAL PRACTICES

“Unethical practices” can include any illegal, fraudulent, or improper behavior or practice of Indium Corporation, its employees, contractors, or suppliers, that violates Indium Corporation’s Code of Conduct, industry regulations, or local laws, and is not limited to:

- Fraud
- Company data or record manipulation, including forgery
- Abuse of authority at any company level
- Unauthorized disclosure of confidential/proprietary information, including for personal advancement
- Criminal activity
- Harassment of employees or third parties

REPORTING PROCEDURES

Indium Corporation recognizes that the normal chain of command identified within company policies and procedures may not be appropriate based on your concerns. In that event, concerns can be reported to any of the following:

- Direct supervisor
- Department manager
- Site manager
- Any member of the Senior Management team
- Regional site Managing Director
- VP of Finance
- President/COO
- CEO
- Compliance Manager

Additionally, the company has designated a Corporate Ombudsman, an independent third party with authority to direct compliance concerns to company management, the company’s Board of Directors, or law enforcement, as appropriate.

Individuals may report unethical practices by email at indiumhotline@mattlawfirm.com or by phone to a confidential voicemail box at +1 (315) 624-0676.