

**COMPOSECURE, INC.**  
**ANTI-CORRUPTION POLICY**

**APPROVED BY THE BOARD OF DIRECTORS**  
**DECEMBER 27, 2021**

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**I. PURPOSE**

**CompoSecure, Inc.** (together with its subsidiaries, “*CompoSecure*” or the “*Company*”) has implemented this Anti-Corruption Policy (this “*Policy*”) for the purpose of ensuring compliance with the U.S. Foreign Corrupt Practices Act of 1977, as amended (the “*FCPA*”), the U.S. Travel Act, the U.S. Domestic Bribery Statute, and all other anti-corruption laws and regulations applicable to our business which may include the UK Bribery Act 2010 (collectively, “*Anti-Corruption Laws*”). This Policy applies to all worldwide directors, officers, employees, and individuals serving as independent contractors of the Company (collectively, “*CompoSecure Personnel*”). Our Board of Directors and senior management are committed to preventing corruption from tainting our business and require you to comply with this Policy. Please report all questions or concerns to the Company’s Compliance Officer whose contact information appears below.

**II. POLICY STATEMENT**

**CompoSecure’ policy with respect to bribery and anti-corruption is simple and clear:**

- **we do not offer or accept bribes in any form;**
- **we do not offer or accept kickbacks in any form; and**
- **we do not tolerate corruption in any of our business dealings.**

You are strictly prohibited from improperly promising, offering, providing, or authorizing the provision of money (such as a bribe or kickback) or anything else of value (such as an inappropriate gift, benefit, or favor) directly or indirectly to any government employee or official or other person in exchange for business or any other advantage for the Company or its partners, investors, clients, or customers. You are also strictly prohibited from soliciting, requesting, or accepting improper payments or any other things of value from any person in relation to the Company’s business. You must comply with all applicable Anti-Corruption Laws while performing services for the Company.

You must comply with all of the Company’s internal controls, including those designed to (i) ensure accurate and complete books and records or (ii) prevent corruption, self-dealing, embezzlement, fraud, money laundering, or other improper activities.

Compliance with this Policy and with U.S. and applicable non-U.S. Anti-Corruption Laws is mandatory. Failure to comply may result in the following: damage to our brand and reputation; multi-million-dollar fines and penalties; and disciplinary action (up to termination of your employment or business relationship with CompoSecure) and possibly jail time and fines for the individuals involved.

*There are no exceptions to this Policy, even if our competitors engage in improper behavior or corruption is an accepted practice in a country where we operate. You are required to adhere to both the spirit and the letter of this Policy with respect to our business anywhere in the world.*

### III. ANTI-BRIBERY PROHIBITIONS

The FCPA and other applicable anti-bribery/anti-corruption laws prohibit you and the Company from corruptly promising, offering, providing, or authorizing the provision of money or anything of value directly or indirectly to a government official and certain other persons to achieve an improper purpose. “*Improper purposes*” include:

- influencing any act or decision of the recipient in his/her official capacity;
- inducing the recipient to do or omit to do any act in violation of his/her lawful duty;
- securing any improper advantage; or
- inducing the recipient to influence any act or decision of a government or instrumentality of a government,

*in order to obtain, retain, or direct regulatory approvals, contracts, business or other advantages.*

The FCPA prohibits improper payments provided to officials of governments, state-affiliated entities, and political parties outside the United States. However, the provision of improper benefits to government or private-sector recipients within the United States will violate U.S. domestic bribery statutes.

In addition to the United States, other countries and regions have promulgated their own anti-bribery legislation. Most of those countries and regions prohibit making improper payments to government and private-sector recipients within their borders. However, several countries have also adopted legislation similar to the FCPA that prohibit improper payments outside those countries. The existence of all of these laws means that there is potential for a company or an individual to face liability in several countries for the same single act of corruption.

Given the broad prohibitions under the FCPA and other anti-corruption laws applicable to the Company, this Policy prohibits bribes, kickbacks, and the provision of other improper benefits and advantages to *any* person, entity, or organization, including, but not limited to, employees, officials, representatives, or agencies of any

- government;
- state-owned or affiliated entity, including, but not limited to, a state hospital, research institution, utility, public university, or sovereign wealth fund;
- public international organization such as the United Nations or the World Bank;
- political party, including the party itself as well as candidates for public office;
- non-governmental organization, including a sports federation such as FIFA or the International Olympic Committee; or
- private-sector company.

One may be asked by certain parties to provide a bribe or other improper benefit in exchange for:

- the award of a contract, sponsorship opportunity, or other business;
- the issuance or renewal of a concession, license, or business, construction, or other permit or registration;
- the successful filing of a patent or trademark application;
- an impermissible reduction in duties or other taxes;
- securing the purchase of state-owned land or other public assets;
- avoiding mandatory inspections;
- obtaining a favorable inspection result or court decision, even if the facts or circumstances do not support such a result; or
- the grant of some other improper advantage.

This Policy prohibits you from providing bribes or other improper benefits to any person to achieve any of the above purposes.

A violation of this Policy can occur even if the bribe fails to achieve the purpose for which it was intended. This means that a person can violate this Policy if that person provides an improper payment or benefit to a recipient and the recipient does not grant any business or other advantage in return. In addition, the mere offer or promise of a bribe or other improper benefit is sufficient to cause a violation. All of the anti-bribery prohibitions contained in this Policy apply irrespective of whether you use Company funds or your personal funds to finance improper payments or other benefits.

This Policy also prohibits you from soliciting or accepting bribes, kickbacks, or other improper payments/benefits from the Company's vendors or other persons in relation to our business. For instance, a violation of this Policy will occur if you cause the Company to overpay a vendor and that vendor then shares all or a portion of that overpayment with you.

This Policy requires you to adhere to high ethical standards and to comply with all applicable laws in the course of performing services for the Company. FCPA and other anti-corruption violations typically involve circumstances that also result in violations of other laws, including those that address money laundering, embezzlement, fraud, export controls, and sanctions/embargoes. Guilty persons can face multiple charges based on the same set of facts.

#### **IV. ACCOUNTING REQUIREMENTS**

The Company is committed to maintaining accurate books, records, and accounts. You are prohibited from concealing bribes or falsifying any other transaction or expense. You must comply with our accounting controls and avoid unauthorized activities or expenses. You are prohibited from using off-the-books accounts or other slush funds.

## V. FACILITATING, EXPEDITING OR SPEED PAYMENTS

This Policy prohibits all corrupt payments or benefits, including so-called grease, speed or facilitating payments provided to government officials in their personal capacity to expedite or secure routine government actions (collectively, “*Facilitating Payments*”). Please note that government agencies may impose *official* fees that may be paid directly in the name of a governmental entity or enterprise itself, as set out in published fee schedules or other official documents. These *official* government fees can be paid to expedite passports, licenses, or other services, provided that they are deposited in the treasury of a government, an official government receipt is collected, and the expense is accurately recorded in the Company’s books. However, Facilitating Payments provided for the benefit of government officials in their *personal* capacity (*i.e.*, are not deposited in an official treasury account belonging to a government) will violate this Policy.

## VI. INTERMEDIARIES AND BUSINESS PARTNERS

This Policy prohibits you from providing bribes or other improper benefits directly as well as *indirectly* through third parties such as sales representatives, agents, consultants, suppliers/vendors, resellers, distributors, customs or other brokers, or other contractors or business partners (collectively “*Intermediaries*”). This prohibition also applies in cases where we use an outside consultant (including a law or accounting firm) to obtain permits or licenses for our business.

You and the Company can be held liable under the FCPA and other applicable Anti-Corruption Laws if you authorize a third party to engage in corruption. The FCPA goes one step further by holding a company or individual liable for providing, promising, or authorizing the provision of money or anything else of value to any person (including an Intermediary) while knowing that all or a portion of that money or thing of value will be used by that person for corrupt purposes. This means that you and the Company can be held liable even if you do not expressly authorize or instruct an Intermediary or other person to pay a bribe, but instead have knowledge that they will. In this context, the term “knowledge” is interpreted broadly to cover (i) the possession of actual information that a person will engage in corruption or (ii) a conscious disregard, deliberate ignorance, or willful blindness as to the other party’s corrupt or improper practices.

Given these risks, this Policy prohibits you from working with corrupt or disreputable Intermediaries. You may only engage third party representatives and vendors who may interact with officials or employees of governments, sovereign wealth funds, state-owned or state-affiliated entities/organizations, public international organizations, investors, or customers in relation to the Company’s business if the following conditions are met: (i) there is a legitimate business justification for the third party relationship; (ii) the third party does not, to the Company’s knowledge, have a history or reputation for corruption; and (iii) the third party is engaged pursuant to a written, signed contract with us that requires compliance with applicable laws, including anti-corruption laws. The Company may also conduct due diligence with respect to such third parties in its discretion. You must confer with the Compliance Officer before retaining any such parties if there are any ‘red flags’ (described below) with respect to the third party or if the third party will interact with non-U.S. public officials or employees of non-U.S. government-affiliated entities, sovereign wealth funds, or state-owned enterprises.

The following situations should be considered as ‘red flags’ (*i.e.*, circumstances indicating potentially heightened risks of corruption or other compliance concerns) with respect to third parties involved in

non-U.S. operations. You must notify the Compliance Officer if you become aware of a ‘red flag’ with respect to any third party that is, or may be, engaged by the Company.

- A reference check reveals the third party’s flawed background or reputation;
- The third party is suggested by a government official;
- The third party objects to FCPA or Anti-Corruption Law provisions in CompoSecure agreement;
- The third party has a close personal or family relationship, or a business relationship, with a government official or the relative of a government official;
- The third party requests unusual contract terms or payment arrangements that raise local law issues, such as payment in cash, payment in another country’s currency, or payment in a third country;
- The third party requires that his or her identity (or if a company, the identities of its owners, principals or employees) not be disclosed; or
- The third party’s commission exceeds the ‘going rate’ or must be paid in cash.

Throughout any relationship with an Intermediary for which you are responsible, you must monitor their performance to ensure that they do not engage in activities that raise FCPA/corruption concerns. This Policy requires you to notify the Compliance Officer if you learn of any Company Intermediary or other contractor that engages in corrupt or other improper practices. In addition, all payments to Intermediaries or other vendors must be accurately reported in our books and records in accordance with the accounting requirements discussed above.

**VII. GIFTS AND HOSPITALITIES**

The FCPA and other laws prohibit the provision of money or things of value for corrupt or improper purposes. However, reasonably priced gifts, meals, entertainment, travel, and other benefits provided for non-corrupt business promotion or goodwill purposes may be permissible under the FCPA and other anti-corruption laws in certain cases. For instance, a plastic pen, a t-shirt, a coffee mug, a paper weight, or a cap of moderate value and embossed with the Company’s logo will generally not violate the FCPA. However, a fur coat, a car, or a vacation will raise FCPA and other anti-corruption concerns, especially if such benefits are provided to a government official or other person who is responsible for making decisions in relation to the Company’s business. In the normal course of business and depending on the circumstances, a non-cash gift, meal, or entertainment valued at USD \$100 (or equivalent) per person or less would generally be considered reasonable, provided that the following conditions are met:

- it complies with local law and this Policy;
- it does not include cash or a cash equivalent (such as gift certificates, gift cards, or vouchers);
- it is reasonable in volume and frequency, taking into account any prior benefits provided to the same recipient; and

- CompoSecure Personnel attend any meals or entertainment events with the recipient.

Notwithstanding the foregoing, you must obtain the general or specific approval of the Compliance Officer prior to providing gifts, meals, travel benefits, and other hospitalities to employees, officials, or agents of any government, political party, state-owned entity, or public international organization, *regardless of the value of such gift or other benefit*. The Compliance Officer will help you determine whether the provision of the benefit is permissible under the FCPA and local law. If the expense is approved, its value and business purpose must be recorded accurately in the Company's books.

## **VIII. OTHER ACTIVITIES**

Corruption concerns can arise in a number of other cases including, but not limited to (i) joint ventures or teaming arrangements with questionable partners; (ii) mergers in or acquisitions of businesses tainted by corruption; or (iii) the provision of political or charitable contributions. Please confer with the Compliance Officer before engaging in these types of activities to ensure that appropriate anti-corruption compliance measures are observed.

## **IX. VIOLATIONS AND CONSEQUENCES**

A violation of this Policy will result in appropriate disciplinary action, including demotion, reassignment, additional training, probation, suspension, or even termination.

The FCPA and other Anti-Corruption Laws are criminal statutes that have broad jurisdictional reach. There is potential for individuals to face liability under those and other Anti-Corruption Laws *irrespective* of their nationality or country of residence. Both the Company and you may be subject to substantial fines and penalties, imprisonment, debarment, the loss of export privileges, and other consequences if a violation occurs.

## **X. TRAINING**

All relevant CompoSecure Personnel must undergo anti-corruption training provided by the Company. The nature, content, and frequency of that training will be determined by the Compliance Officer based on your risk profile. We encourage all of our business partners to provide training to their personnel as well.

## **XI. STATUS**

This Policy does not form part of any employment contract with you and may be amended at any time. This Policy should be read in conjunction with the Company's Code of Conduct and other policies and procedures.

## **XII. CERTIFICATION**

You will be asked to execute an electronic certification acknowledging that you have read and will comply with this Policy based on the form in Attachment 1. The Company may require you to recertify your compliance with this Policy on a periodic basis.

### **XIII. REPORTING AND QUESTIONS**

You have an affirmative obligation to report all violations of this Policy to the Compliance Officer via email to [legal@composecure.com](mailto:legal@composecure.com).

Reports may also be submitted anonymously. However, we encourage you to consider revealing your identity so that we can properly follow up and investigate alleged violations. The Company will ensure that appropriate confidentiality measures are taken and will not retaliate against any individual for reporting violations in good faith.

You must also notify the Compliance Officer of any corrupt, improper, illegal, or other unusual requests for payments or other benefits made by officials or employees of investors, vendors, business partners, state-owned entities/organizations, or governments. By reporting such matters, you will enable us to explore options to achieve our business goals without having to interact with such persons or provide improper benefits.

We welcome any questions or constructive comments that you may have regarding the substance and implementation of this Policy in your respective sector and/or territory. Please direct such communications to the Compliance Officer.

### **Attachment 1: Certification by CompoSecure Personnel**

I hereby certify that I have read and am in compliance with the Anti-Corruption Policy (the "**Policy**") of CompoSecure, Inc. (together with its subsidiaries, the "**Company**"). Neither I nor, to my knowledge, any of my direct or indirect reports nor any Company contractor or business partner with which I or they work has offered, provided, solicited, or accepted a bribe, kickback, or other improper payment/benefit or has otherwise taken any actions on behalf of the Company that would result in a violation of (i) the Policy, the Code of Conduct and other policies or procedures of the Company that have been provided to me; (ii) the U.S. Foreign Corrupt Practices Act of 1977, as amended; or (iii) any other anti-corruption or other law or regulation such as the UK Bribery Act 2010. I will notify the Company's Compliance Officer if, at any time, I learn of or suspect such violation.