



Code of Conduct

Implementation

Cimarron Energy operates its business in accordance with the highest ethical standards and relevant laws. The Company places the highest value on the integrity of each of its employees and representatives. All employees, agents, and consultants of Cimarron Energy are responsible for complying with all applicable laws, regulations and this Code of Conduct. Cimarron Energy's corporate culture demands not only legal compliance, but also responsible and ethical behavior.

The policies in this Code apply to all employees, officers and agents of Cimarron Energy. The Code is not intended to cover all Cimarron Energy policies or all laws. If a local law conflicts with a policy in this Code, you must comply with the law; if a local custom or practice conflicts with a policy in this Code, you must comply with the Code. Think of this Code as a baseline, or a minimum requirement, which must always be followed.

Cimarron Energy provides this Code of Conduct to its employees for their guidance in recognizing and resolving properly the ethical and legal issues they encounter in conducting the Company's business. Employment by Cimarron Energy is employment at will. This means that you have the right to terminate your employment at any time and for any reason without notice, and the Company may exercise the same right.

Our Relationship with Our Customers

Cimarron Energy serves many of the world's most distinguished enterprises for whom we design, develop, manufacture and market quality products and services.

We Obey All Laws and Regulations

Our customer relationships are critical to Cimarron Energy. In meeting our customers' needs, the Company is committed to doing business with integrity and according to all applicable laws. Products must be designed, produced, installed and serviced to internal standards and to comply with external regulations, the standards of the appropriate approval entities, and any applicable contractual obligations.

We Provide Quality Products and Services

We will provide products and services that meet or exceed our customers' expectations for quality, integrity and reliability, and we will satisfy their requirements with on-time deliveries and at competitive prices.

- When our products, systems or components are manufactured or assembled according to our customers' specifications, there will be no change in design, material content or process,

or substitution of parts, unless clearly authorized in writing by the customer or permitted under the terms of the contract or by regulation or commercial practice.

- Where inspection or testing is required to confirm conformance to specifications, there will be no misrepresentation of data or falsification of records.
- Our products will be safe for use by our customers and other end-users, and they will meet all applicable government standards and regulations.
- No product or system that has been used, other than in normal testing or reconditioned by either Cimarron Energy or our customers, will be resold as new equipment.

We Seek Business Openly and Honestly

Sales are the lifeblood of the organization, and we will market our technologies, products and services fairly and vigorously based on their proven quality, integrity, reliability and price.

- Cimarron Energy strictly prohibits bribes, kickbacks or any other form of improper payment, direct or indirect, to any representative of government, labor union, customer or supplier in order to obtain a contract, some other commercial benefit or government action. The Company also strictly prohibits any employee from accepting such payments from anyone.
- We will not offer our existing or potential commercial customers gifts or favors of more than nominal value (approximately \$100 or less). Reasonable business entertainment is permitted, including traditional promotional events, as long as what is offered is inconsistent with usual business practice, cannot be construed as a bribe or a payoff, is not in violation of any law and would not embarrass the Company or ourselves if disclosed publicly.
- Where a customer or potential customer notifies Cimarron Energy of a policy or preference in which it prohibits or limits gifts to the customer's employees, Cimarron Energy will respect such notification.
- It is Cimarron Energy policy to avoid any misstatement of fact or misleading impression in any of its advertising, literature, exhibits or other public statements. All statements made in support of our products and services should be true and supported by documentation.
- We will communicate clearly and precisely, either orally or in writing, so that our customers understand the terms of our contracts, including performance criteria, costs and schedules.
- We will seek all marketing data properly and legally, and we will not obtain or use any government classified or sensitive information from any source where there is reason to believe that the release of the information is unauthorized. If you are in doubt, contact a member of the Senior Leadership team.
- We will make certain that marketing expenditures are necessary, prudent, job-related and consistent with Company policies.
- We will comply with the domestic and international antitrust and competition laws of all nations where we do business. These laws protect the free enterprise system and encourage

vigorous, but fair, competition. Among other stipulations, these laws prohibit any formal or informal understanding, agreement, plan or scheme among competitors that involves prices, territories, market share or customers to be served and activities or agreements that unfairly restrict competition. All mergers, acquisitions, strategic alliances, and other types of extraordinary business combinations should receive timely legal review to assure that they do not raise concerns of market dominance or improper coordination among competitors. Likewise the Company's routine business and licensing plans should be conducted so that we compete aggressively, but fairly.

- We will establish competitive prices for our products and services.

We Follow Accurate Billing Procedures

The Company will reflect accurately on all invoices to customers the sale price and terms of sales for products sold or services rendered. Every employee has the responsibility to maintain accurate and complete records. No false, misleading or artificial entries may be made on Cimarron Energy's books and records.

We Safeguard the Property of Others

Cimarron Energy safeguards the tangible and intellectual property of those with whom we do business, which may be used in fulfilling work assignments, and we will comply with all regulations or contractual requirements governing the use of such property. We will obtain the tangible and intellectual property of competitors only through lawful means.

- We will not accept or retain classified materials to which we are not entitled or for which there is no need.
- The Foreign Corrupt Practices Act ("FCPA") prohibits Cimarron Energy from making a payment or giving a gift to a foreign government official, political party or candidate or public international organization ("foreign official") for purposes of obtaining or retaining business. The FCPA applies to Cimarron Energy everywhere in the world we do business. A violation occurs when a payment is made or promised to be made to a foreign official while knowing that the payment will be used to unlawfully obtain or maintain business or direct business to anyone else. Employees should contact a member of the Senior Leadership Team with questions.
- We will not give or encourage anyone else to give inducements of any kind to any government employee, or to any supplier under government or non-government contracts or subcontracts, in order to gain any business advantage or contract.
- Managers will be aware of and comply with conflict of interest laws and regulations covering government procurements, including circumstances under which current or former government employees may be offered, or can accept, employment with the Company.
- It is the Company's obligation to provide high quality products and services at fair and reasonable prices, use professional service independent contractors only for legitimate legal purposes, and comply with all applicable regulations.
- Care will be taken to avoid mischarging of costs, including cross-charging of costs

between contracts, charging direct costs as indirect costs or any other similar mischarging.

- Should an improper practice or irregularity occur within the Company, Cimarron Energy is committed to making all necessary corrections and taking prompt remedial action to prevent recurrence.

Our Relationship with our Suppliers

Cimarron Energy's suppliers are our partners. The high caliber of the materials, goods and services they provide is linked directly to the quality, reliability and prompt delivery of the Company's products to our customers and, thus, to customer satisfaction.

We Seek Long-Term Relationships

We will strive to build long-term relationships with our suppliers and award business based on their ability to meet our needs and commitments, their reputations for service, integrity and compliance, their high standards for quality and delivery and their price structures.

- We will provide the same information and instructions to each competing supplier for a proposed purchase.
- We will protect all proprietary data our suppliers provide to us as reflected in our agreements with them.
- We encourage all Cimarron Energy purchasing personnel or others who may use the goods or services of other companies to be receptive to new ideas, techniques and materials and to make reasonable efforts to evaluate their offerings and give them due consideration.
- We will not reproduce software that is licensed to us by a supplier nor will we incorporate it into our own internally developed software unless we are permitted to do so.

We Will Not Be Influenced by Gifts

We will not be influenced by gifts or favors of any kind from our suppliers or potential suppliers. The Company expects each employee to exercise reasonable judgment and discretion in accepting any gratuity or gift offered to the employee in connection with employment at Cimarron Energy.

- It is Cimarron Energy policy to discourage the receipt of gifts either directly or indirectly by employees as any gift may be misconstrued as an attempt to influence business decisions. This does not apply to unsolicited promotional materials of a general advertising nature, such as imprinted pencils, memo pads and calendars as long as what is given is accepted without any express or implied understanding that the recipient is in any way obligated.
- Presentations of a ceremonial nature in keeping with national custom may be permitted as long as what is accepted is not in violation of any law, cannot be construed as a bribe or a payoff and would not embarrass the Company or ourselves if disclosed publicly.
- Gifts of nominal value (less than \$100) are permitted, provided they are given as a

gesture of professional friendship, and do not involve a Company commitment having to do with the transaction of business.

- An occasional meal or entertainment in the normal course of business relations, paid for by a supplier or potential supplier, is permitted provided that a representative of the supplier is in attendance and such hospitality is not excessive or unusual in nature.
- It is never acceptable to solicit gifts, gratuities, or business courtesies for the benefit of a Cimarron Energy employee, family member or friend.
- Any purchases or orders to a company associated with a family member of a Cimarron Energy employee must be approved by the Board of Directors of Cimarron Energy.

Our Relationship with the Company and Each Other

Cimarron Energy's most important resource is its employees -- the men and women whose skills, energy and commitment to excellence are the source of the Company's character and central to its market leadership.

We Honor the Individual

The Company recognizes the dignity of the individual, respects and trusts each employee, provides compensation and benefits that are competitive, promotes self-development through training that broadens work-related skills, and values different perspectives and ideas.

We Live Our Values

As representatives of the Company to the outside world, and regardless of the pressures inherent in conducting business, we will act responsibly and in a manner that will reflect favorably upon ourselves and Cimarron Energy as a whole. We will carry out our assignments guided by the principles set forth in this Code of Conduct and our corporate policies.

- To help us meet our ethical obligations, the Company will maintain a workplace environment that does not create pressures that would encourage any departure from ethical behavior or acceptable standards of conduct.
- The Company will provide training and educational materials, including this Code and various legal and other compliance materials, so that we are informed of Cimarron Energy's ethical standards and our requirement to comply with all laws and Company policies.
- The Company will provide the channels through which we are able to report suspected violations of our Code or other Company policy.
- To the extent possible, the Company will maintain the confidentiality of our communications about suspected violations that are made in good faith, except where law or policy may require disclosure.

We Avoid Conflicts of Interest

We and our immediate families will avoid any situation that may create, seem to create, or be perceived to create a conflict between our personal interests and the interests of the Company.

- A conflict, or appearance of a conflict, might arise, for example, by accepting a gift from a current or potential customer, supplier or competitor; owning a financial interest (other than share holdings in a publicly traded company) in, or serving in a business capacity with, an outside enterprise that does or wishes to do business with, or is a competitor of, the Company; serving as an intermediary for the benefit of a third party in transactions involving the Company; using confidential Company information or other corporate assets for personal profit, conducting business for another enterprise during our normal working hours or using Company property to conduct business for another enterprise.
- We will take necessary steps to avoid improper reporting relationships and not directly or indirectly supervise or report to persons with whom we have a family or a close personal relationship.
- If a conflict of interest or appearance of a conflict of interest develops, the employee should disclose the issue to a member of the Senior Leadership team related to the business in which the conflict arises for review with the Senior Leadership Team and appropriate action, if necessary.

We Invite Full Participation

Cimarron Energy is committed to an all-inclusive work culture. We believe and recognize that all people are unique and valuable, and should be respected for their individual abilities and contributions. The Company aims to provide challenging, meaningful and rewarding opportunities for personal and professional growth to all employees without regard to gender (including pregnancy, childbirth or related medical conditions), race, ethnicity, color, sexual orientation, physical or mental disability, age, ancestry, legally protected medical condition, family care status, marital status, religion, veteran status, national origin or any other legally protected status.

- This policy applies to all phases of the employment relationship, including promotions, demotions, transfers, layoffs or terminations, compensation, use of facilities and selection for training or related programs.

We Work in a Positive Environment

Cimarron Energy endeavors to provide all employees an environment that is conducive to conducting business and allows individuals to excel, be creative, take initiatives, seek new ways to solve problems, generate opportunities and be accountable for our actions. The Company also encourages teamwork in order to leverage our diverse talents and expertise through effective collaboration and cooperation.

- The Company prohibits the manufacture, distribution, sale, purchase, transfer, possession, or use of illegal drugs in the workplace, while representing the Company outside the workplace or if such activity affects our work performance or the work environment of the Company. The same restrictions apply to alcohol and marijuana, unless the Company authorizes its use.

- The Company prohibits all forms of harassment of employees by fellow employees, employees of outside contractors or visitors. This includes any demeaning, insulting, embarrassing or intimidating behavior directed at any employee because of his or her gender (including pregnancy, childbirth or related medical conditions), race, ethnicity, color, sexual orientation, physical or mental disability, age, ancestry, legally protected medical condition, family care status, marital status, religion, veteran status, national origin or any other legally protected status.
- The Company specifically bans unwelcome sexual advances or physical contact, sexually oriented gestures and statements, and the display or circulation of sexually oriented pictures, cartoons, jokes or other materials. It also prohibits retaliation against any employee who rejects, protests, or complains about sexual harassment. A complaint procedure is available to employees to report sexual harassment.
- The Company prohibits employees from engaging in any hostile physical contact, intimidation, threats of such actions or violence, or any other actions that may be considered threatening or hostile in nature while on Company premises, at a Company-sponsored function, while representing Cimarron Energy or acting on its behalf.
- The Company encourages open, timely communications that help us achieve organizational goals, share information, increase understanding, participate in the decision-making process, enhance our pride in the organization and provide recognition for our work-related successes.

We Will Not Employ Child or Forced Labor

- Cimarron Energy does not and will not employ child labor. Cimarron Energy defines a child as anyone under the age of sixteen. If local law is more restrictive than Cimarron Energy policy, Cimarron Energy will comply with the letter and spirit of the local law. However, even if local law allows Cimarron Energy to employ people who are younger than sixteen, the Company will not do so.
- Cimarron Energy does not and will not employ forced labor or employ subcontractors that do.

We Provide a Safe Workplace

It is Cimarron Energy policy to establish and manage a safe and healthy work environment and to manage its business in ways that are sensitive to the environment. The Company will provide a workplace that is free from safety or health hazards or will control such hazards to acceptable levels.

- To help safeguard ourselves and others and our facilities, the Company will conduct and support research on the effects of materials and products it handles or sells; share promptly any information it may obtain relative to any found hazard; conduct preventive safety and loss prevention and occupational health programs, and require that equipment and operating practices meet the highest standards and conserve resources.

We Safeguard Company Property

Safeguarding Cimarron Energy assets is the responsibility of all employees and Company representatives. We must use and maintain such assets with care and respect while guarding against waste and abuse. Cimarron Energy's ability to serve its customers requires the

efficient and proper use of the Company's assets and resources, including proprietary information, technology data, software, information systems resources, land, buildings, equipment, components, raw materials, inventory and cash.

- We will use these assets according to all Company policies and procedures, refrain from using corporate assets for personal gain, comply with security programs that help prevent their unauthorized use or theft, and abide by all regulations or contractual agreements governing their use.
- We will not take personal advantage of business opportunities that we discover through the use of corporate assets or while acting within the scope of our employment.
- We will protect from disclosure or misuse all non-public information pertaining to the Company, including products and business, including acquisition and divestiture plans, technology, competitive position, directional strategy, customers, and product costs. Such types of information are considered trade secrets or confidential information.
- Those of us with access to non-public information about the Company that could affect the price of its securities, such as business strategies, financial results, pending transactions or contracts, new products, or research results, will not trade in Cimarron Energy's securities or the securities of other affected companies, nor will we disclose the information to others until the information has been disclosed to the public.
- We will not purchase, sell or otherwise utilize financial instruments, including but not limited to, prepaid variable forward contracts, instruments for the short sale or purchase or sale of call or put options, equity swaps, collars, or units of exchangeable funds, that are designed to or that may reasonably be expected to have the effect of hedging or offsetting a change in the market price of Cimarron Energy securities.
- We will not disclose without authorization proprietary technical data developed or purchased by the Company.
- We will take actions necessary to safeguard all passwords and identification codes to prevent unauthorized access to the Company's information systems resources.
- We will not reproduce licensed or internally developed software for our personal use unless permitted by the terms of the license.
- We will safeguard Cimarron Energy's intangible assets, such as information, intellectual property and innovative ideas. Intellectual property rights, including patents, trademarks, copyrights, trade secrets and know-how must be planned for and managed with the same degree of care as any other valuable asset. New concepts and ideas will be identified for purposes of evaluation and protection, as appropriate, to support the long-term and short-term goals of the Company. Where appropriate, ideas should be directed to the Senior Leadership team for patent, copyright or trade secret protection.

We Will Safeguard the Information of Others

- We will observe obligations of confidentiality and non-disclosure of trade secrets of others, including vendors and former employers, with the same degree of diligence that

employees are expected to use in protecting Cimarron Energy's own confidential information and trade secrets.

- We will not accept or retain unsolicited ideas or inventions from people outside of Cimarron Energy. Receiving unsolicited ideas and inventions can expose the Company to claims of misappropriation of ideas if another organization within Cimarron Energy is working on something similar or already knew about the idea from a different source. Employees receiving unsolicited ideas should send them to the Senior Leadership Team for handling without reading or sharing them with others.

We Report with Integrity

Cimarron Energy's financial, accounting, and other reports and records will accurately and fairly reflect the transactions of the Company in reasonable detail, and in accordance with approved accounting practices and procedures and applicable government regulations.

- Transactions of the Company will be executed only in accordance with management's general or specific authorizations.
- Administrative and accounting controls will be in place to assure that financial and other reports are accurately and reliably prepared, and fully and fairly disclose pertinent information.
- The Company prohibits false or misleading entries in its books and records for any reason and will not condone any undisclosed or unrecorded bank accounts or assets established for any purpose.
- All payments of commissions and discounts will be made with a separate Company check, draft to the payee or electronic transmission, except in the case of rebates, where credit memoranda are preferred.
- No employee will authorize payment knowing that any part of the payment will be used for any purpose other than what is described in documents supporting the payment.
- Expenses incurred by employees in performing Company business will be reimbursed through the filing of expense reports, which must be documented accurately and completely.

Our commitment to report with integrity has particular application to employees who serve in our senior financial positions, including but not limited to the Chief Executive Officer, Chief Financial Officer, Controller, and Assistant Controller. Senior Financial Officers are vested with both the responsibility and authority to protect, balance, and preserve the interests of all of the enterprise stakeholders, including shareholders, clients, employees, suppliers, and citizens of the communities in which business is conducted. Senior Financial Officers fulfill this responsibility by prescribing and enforcing the policies and procedures employed in the operation of the enterprise's financial organization, and by demonstrating the following:

Senior Financial Officers will exhibit and promote the highest standards of honest and ethical conduct through the establishment and operation of policies and procedures that:

- Encourage full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission and in other public communications made by the Company.
- Encourage and reward professional integrity in all aspects of the financial organization, by eliminating inhibitions and barriers to responsible behavior, such as coercion, fear of reprisal, or alienation from the financial organization or the enterprise itself.
- Prohibit and eliminate the appearance or occurrence of conflicts between what is in the best interest of the enterprise and what could result in material personal gain for a member of the financial organization, including Senior Financial Officers.
- Provide a mechanism for members of the finance organization to inform senior management of deviations in practice from policies and procedures governing honest and ethical behavior.
- Demonstrate their personal support for such policies and procedures through periodic communication reinforcing these ethical standards throughout the finance organization.

Senior Financial Officers will establish and manage the enterprise transaction and reporting systems and procedures to ensure that:

- Business transactions are properly authorized and completely and accurately recorded on the Company's books and records in accordance with Generally Accepted Accounting Principles (GAAP) and established company financial policy.
- The retention or proper disposal of Company records shall be in accordance with established enterprise financial policies and applicable legal and regulatory requirements.
- Periodic financial communications and reports will be delivered in a manner that facilitates the highest degree of clarity of content and meaning so that readers and users will quickly and accurately determine their significance and consequence.

Senior Financial Officers will establish and maintain mechanisms to:

- Educate members of the finance organization about any federal, state or local statute, regulation or administrative procedure that affects the operation of the finance organization and the enterprise generally.
- Monitor the compliance of the finance organization with any applicable federal, state or local statute, regulation or administrative rule.
- Identify, report and correct in a swift and certain manner, any detected deviations from applicable federal, state or local statute or regulation.

Employee Off-Duty Behavior

Generally, employees' personal lives are not the concern of the Company. However, employees are expected to conduct themselves in such a manner that their actions do not reflect unfavorably on the Company or on fellow employees. With the widespread use of social media on a personal basis, these actions also include employees' behavior while

participating in social media. Cimarron Energy employees are also expected to conduct themselves in a manner so that their actions do not negatively affect their ability to assume the full responsibilities of their jobs.

Our Relationship with Others

As a corporate citizen in communities around the world, Cimarron Energy abides by local laws, supports civic organizations, encourages employee involvement in worthwhile causes and conserves nature's valuable resources.

We Comply with Local Laws and Customs

Cimarron Energy conducts businesses globally where laws, customs and social requirements may be different from those in the United States. It is Company policy to abide by the national and local laws of our host nations and communities. In case of any conflict with U.S. law, the Senior Leadership team should be promptly consulted.

We Do Not Make Political Contributions

Company policy does not allow Company funds to be used for political contributions, directly or indirectly, in support of any party or candidate in any election on the federal, state or local level.

- Wherever lawful, however, the Company may contribute to an occasional local initiative or referendum campaign where Cimarron Energy's interests are directly involved. Any such payments, however, require advance clearance from the Senior Leadership team.
- As interested citizens, Cimarron Energy employees are free to make individual, personal contributions to candidates of their choice.

We Protect the Environment

Cimarron Energy abides by all applicable health, safety and environmental laws and regulations in countries and communities in which we operate, and where those are considered inadequate, the Company will abide by our own high standards.

- The Company is committed to make health, safety and environment an integral aspect of our design of products, processes and services, while responsibly managing our products throughout their lifecycle.
- The Company will utilize management systems to apply a global standard that provides protection of human health and the environment including compliance with applicable laws and regulations. We educate customers, suppliers and the public about the safe use of our products and related environmental issues throughout their lifecycle.
- The Company will identify, control and endeavor to minimize the use of hazardous materials, and will endeavor to reduce wastes.
- The Company will conduct prevention and control programs to safeguard employees and the public and will review the effectiveness of these programs through its assurance process, environmental audit and other systems.

- The Company will comply with all laws, regulations and governmental standards to protect the public and the environment.

We Require Ethical Behavior of Those Representing the Company

When it is necessary to engage the services of an individual or firm to consult for or otherwise represent the Company, special consideration must be given to avoid any situation that may create, or appear to create, a conflict of interest between Cimarron Energy and the person or firm employed.

- The Company will enter into representation or supplier agreements only with companies that have a demonstrated record of and commitment to the highest ethical standards. Efforts will be taken by Cimarron Energy to ensure that agents, consultants, and representatives are aware of this Code.
- The Company will seek to inform our agents, consultants, and representatives of their responsibility to act in behalf of Cimarron Energy consistent with the Code, other Cimarron Energy policies and any applicable law or regulation.

We Comply with Antiboycott Laws

Cimarron Energy will comply with laws that prohibit a wide variety of activities associated with organized foreign economic boycotts, including: refusing to do business with boycotted countries, their nationals or blacklisted companies; furnishing information about the Company's or any person's past, present or prospective relationship with boycotted countries or blacklisted companies; furnishing information about any person's race, religion, sex, national origin, or membership in or support of charitable organizations supporting a boycotted country; discriminating against individuals or companies on the basis of race, religion, sex or national origin; and paying, honoring or confirming letters of credit containing prohibited boycott provisions.

- Under U.S. antiboycott legislation, Cimarron Energy is required to report the receipt of any request to participate in an international boycott. Requests are often found in letters of credit, shipping instructions, certificates of origin and other contract-related documents. The receipt of a boycott request must be reported immediately to the Senior Leadership Team.

We Comply with Export Control and Import Laws

Cimarron Energy will comply with all Export Control and Import laws and regulations that govern the exportation and importation of commodities and technical data, including items that are hand-carried as samples or demonstration units in luggage. Failure to comply with these laws could result in heavy fines or the loss or restriction of Cimarron Energy's export or import privileges, which, in turn, could seriously and adversely affect a significant portion of the Company's business.

Responsibilities of All Employees

Each Cimarron Energy employee shall comply with the letter and spirit of the Code of Conduct and with the policies and procedures of the Company, and shall communicate any suspected violations promptly.

- Employees may confront an ethical issue where this Code or other Company policy does not expressly provide an answer. Employees should feel comfortable contacting a member of leadership, a member of the Senior Leadership Team or using one of the other resources described in this section.
- Employees are governed by the Company's External Communications Policy, including the designation of authorized Company spokespersons and references to social media (particularly covering descriptions of the various types of social media participation, discussion of the guidelines for responsible use of a social media tool or channel, and the consequences of misusing social media and/or misrepresenting the Company).
- Employees shall report violations of laws, regulations, company policies or the Code of Conduct through their normal reporting channels, or by sending an email to CimarronEthics@GetInTouch.com. Employees may report anonymously if they are unwilling to provide their name. (Reporting anonymously makes the investigation of allegations more difficult, since there is no ability to follow up with the employee to obtain additional detail). This helpline is not intended to replace normal supervisory channels for reporting questionable conduct or seeking advice about appropriate ethical behavior.
- Any employee who in good faith raises an issue regarding a possible violation of law or Company policy will not be subject to retaliation and their confidentiality will be protected to the extent possible, consistent with law and corporate policy and the requirements necessary to conduct an effective investigation.
- Allegations will be investigated by the proper corporate, business unit or department personnel.
- In order to facilitate implementation of this Code of Conduct, employees have a duty to cooperate fully with the investigation process and to maintain the confidentiality of investigative information unless specifically authorized to disclose such information.
- All non-hourly employees must complete an annual certification as to knowledge of actual or apparent violations of this Code. Copies of the Certification will be distributed once a year to each such employee and shall certify that they will comply with it while engaged in Company business.
- All agents or contract labor retained by the Company shall be given a copy of this Policy
- Failure to comply with the Code of Conduct may result in disciplinary action, up to and including termination, as appropriate, and may also require restitution or reimbursement from the employee and referral of the matter to government authorities under the guidance of the Senior Leadership team.
- Discipline may also be imposed for conduct that is considered unethical or improper even if the conduct is not specifically covered by this Code.

No Code or set of values can address every ethical choice we face in business; no communication system or oversight group can ensure complete compliance. Each of us must use good common sense and judgment in our personal conduct.