Worldwide Code of Ethics

ALBAUGH®
your alternative

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Kurt Pedersen Kaalund
Chief Executive Officer

A MESSAGE FROM THE CEO

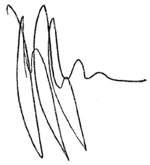
Dear Colleague,

At Albaugh, LLC, we have a long and proud manufacturing history. We honor that legacy and secure our future success by acting responsibly and with integrity everywhere we operate. By adhering to the highest standards and honoring our commitments, we gain and maintain trust of one another, our customers, business partners and other stakeholders.

Our success depends on each and every one of us consistently doing what is right. Our Code of Ethics reflects our continued commitment to applying ethical business practices and legal compliance throughout our global organization wherever we operate and conduct business on behalf of Albaugh.

Albaugh, LLC's Code of Ethics is designed to serve as a resource to help you understand your responsibility as an employee to conduct business in an ethical and legal manner. It explains the principles and standards we are all expected to follow in living our core values, as well as specific laws, regulations and policies that apply to us. Please read the Code in its entirety, refer to it on an ongoing basis and ask questions if something is unclear.

Thank you for your continued commitment to upholding our culture of compliance and integrity!



Kurt P. Kaalund
Chief Executive Officer

ALBAUGH ETHICS HOTLINE

The Albaugh Ethics Hotline is staffed by live operators from EQS Group, an independent company, 24 hours a day, 7 days a week. Calls are free, confidential and may be made anonymously. Operators are equipped to take these calls in all primary languages.

Employees, suppliers and third-party business partners are able to raise concerns via the internet at https://albaugh.integrityline.com. Options are available to display the report form in your preferred language.

It is important to report all violations or suspected violations of this Code of Ethics, including concerns regarding accounting, internal accounting controls, or auditing matters. If you suspect a violation, talk to your manager, department head, the Human Resources or Legal Department, or a Regional Compliance Officer. If you are not comfortable doing so, you may e-mail Crystal Kansala, Group Compliance Program Coordinator, in Ankeny, Iowa, USA at crystalk@albaughllc.com or call the Ethics Line. A non-retaliation policy is in place to protect individuals who in good faith report suspected violations. The company undertakes to respond to all reports within 2 business days of receipt.

ALBAUGH ETHICS HOTLINE CONTACT INFORMATION

International dialing instructions

Below are the direct dial numbers for each country where the Company has an office or Manufacturing Plant. A full list of numbers by country can be found at https://albaugh.integrityline.com, or by accessing the QR Code shown below. The phone lines are available 24-hours a day, 7 days a week.

Argentina	0800.333. 0095
Brazil	0.800.892.2299 *(All Carriers)* 55.2120181111 *(Rio De Janeiro; All Carriers)*
Canada	1.800.235.6302 *(All Carriers)*
China	400 120 3062
Colombia	57 6013816523 01-800-5189703
India	000-800-050-3898 (+91)-3371279005 *(Local)*
Mexico	800.681.6945 *(All Carriers)*
Slovenia	0.804.88853
Spain	900.905.460 *(All Carriers)*
Switzerland	0800.838.835 *(All Carriers)*
United States of America	1.800.461.9330

Internet

Independently report issues via the Internet at https://albaugh.integrityline.com.

Options are available to display the report form in your preferred language.

Mobile Phone

Please scan the QR code provided here.

ABOUT THE CODE

Albaugh LLC ("ALBAUGH" or "Company"), and its subsidiaries, affiliates and related companies, are committed to conducting business according to the highest ethical and legal standards. All employees, officers, and the Board of Managers of ALBAUGH (collectively "Employees") must use sound business judgment and adhere to the highest standards of integrity and propriety while performing their jobs.

This Code of Ethics (the "Code") which applies to all employees, contractors, consultants, agents and other persons acting on behalf of Albaugh, is part of the Company's ethics and compliance program, and is the framework for the high standards we envision on a company-wide basis. It does not include all Company policies or the rules and regulations that apply to every situation and should be viewed as part of the policies, procedures, and requirements of the law that guide you in your daily work. In addition, there may be local policies, regulations and legislation that are applicable in some countries where we operate, and any employees assigned to those particular jurisdictions are expected to comply with those policies, regulations and legislation. **The Code is not a contract of employment and does not create any contractual rights of employment between you and the Company.**

Every employee is expected to adhere to these standards. A violation impacts our competitive position and may expose the Company and you to civil and criminal liability. Questions about a standard contained in this Code, or a situation presenting an ethical issue not addressed in this Code, should be directed to your supervisor, local Human Resource Department, local Regional Compliance Officer, or Group Compliance Program Coordinator. Violations of this Code may subject the violator to disciplinary action, including but not limited to dismissal from employment, and to the institution of criminal or civil legal proceedings to redress such violations.

Further, employees who engage vendors, agents, suppliers, or consultants must use reasonable efforts to monitor their work to ensure they act in a manner consistent with the principles in this Code, and should contact their supervisor, local Regional Compliance Officer or Group Compliance Program Coordinator for additional guidance if needed. If you suspect a vendor, agent, supplier, or consultant is, during the course of conducting business with the Company, acting in a manner inconsistent with the Code, contact your supervisor, local Regional Compliance Officer, or the Group Compliance Program Coordinator.

Wherever this Code requires or recommends a report to your local Human Resource Department, local Regional Compliance Officer or local Legal Department, or if you are not comfortable reporting to such Departments, such reports should be directed to the Group Compliance Program Coordinator in Ankeny (crystalk@albaughllc.com). You may also confidentially and anonymously report ethics concerns by contacting the Albaugh Ethics Hotline, which can be accessed via e-mail or through the list of current U.S. and international toll-free numbers included on page 5 of this Code.

COMPLIANCE WITH LAWS

The Company and all employees must abide by all applicable laws, rules and regulations of each country where we do business. This is the most fundamental policy underlying our commitment to integrity and ethical conduct. Violation of laws, rules and regulations may subject employees to disciplinary action up to and including termination, as well as to civil and criminal penalties. Even if in some countries certain laws are not enforced in practice, compliance is nonetheless required.

The laws of the United States frequently extend to the Company's operations throughout the world. Other countries may also apply their own laws outside of their borders to their own citizens or to any company doing business with those specific countries. In some instances, there may be a conflict between applicable laws of two or more countries. If the Code or the Company require you to take an action (or prohibits you from taking action) you believe is in violation of a law, or you believe there is a conflict between the laws of two or more jurisdictions, consult your local Regional Compliance Officer, Group Compliance Program Coordinator, or Legal Department.

Conversely, there may be laws in certain countries which do not apply outside those countries; such laws may be addressed in other Company policies or procedures.

The number of laws and regulations around the world affecting the Company increase and become more complex each year. When possible, and to the extent generally applicable, the Code will be modified to conform to changes in laws and customs or additional policies may be implemented. Questions regarding applicable laws, rules, and regulations affecting your business activities should be directed to your local Legal Department.

INTEGRITY OF BOOKS AND RECORDS

Business records, including e-mails, are subject to internal and external audits and may be required to be disclosed during the course of litigation or a government investigation. Falsifying, altering, or destroying any record, account, or other business-related document in violation of the Company's policies or guidelines is prohibited. Creating or maintaining any secret or unrecorded fund, asset, or account is also prohibited. Finally, making false statements, misleading entries, or intentional omissions or misrepresentations in the Company's books, expense reports, or financial or business records is prohibited.

Government Proceedings and Requests for Information

It is Company policy to cooperate with government requests for information and investigations. If asked to provide information (either written or verbally) for a government investigation, or if a government representative appears at the workplace, employees must contact the local Regional Compliance Officer, Group Compliance Program Coordinator, or Legal Department immediately and before providing any information. All information provided should be truthful and accurate and you must not obstruct or impede the request. Do not alter, falsify, cover up, dispose of, or destroy any documents or records related to a government request or investigation.

AVOIDING CONFLICTS OF INTEREST

We expect that business decisions are made in the best interest of the Company. Therefore, any situation creating a conflict of interest between the personal interests of an employee and the Company's interests must be avoided.

Whether a conflict of interest exists can be unclear. If you become aware of an actual or potential conflict, you must disclose such conflict to your supervisor, local Human Resources Department, local Regional Compliance Officer, Legal Department or Group Compliance Program Coordinator.

Gifts, Loans and Entertainment

Employees are generally prohibited from soliciting, giving or receiving from any actual or potential supplier, customer, distributor, vendor, partner or competitor of the company (**"Third Party"**) gifts, loans, entertainment, personal discounts, goods, services or favors, in more than a de minimis amount. Accepting gifts is always prohibited if (i) in cash; (ii) an attempt to influence the recipient's business decision or judgment; or (iii) it violates any applicable law or regulation. Soliciting gifts or benefits in any amount is also prohibited.

If the value of the gift exceeds USD $50.00, you must report the gift to the local Regional Compliance Officer or Group Compliance Program Coordinator within 10 days of receipt. Similarly, if you receive multiple gifts from a single source in a one (1) year period, and their total value exceeds US $100.00, written disclosure in the manner specified above is required.

Acceptance of normal business entertainment (e.g. lunches, dinners, golf or sporting events) from a Third Party is appropriate if the event involves a bona fide business purpose. Attendance at sporting, entertainment, or similar events where if the giver will not be present is permitted only with approval of the recipient's supervisor and the Region President for Regional employees or CEO for Group employees. Even where the host is in attendance, accepting tickets to lavish events (e.g. the Olympics, Football World Cup, Super Bowl) is not permitted. Attending business-related conferences or seminars paid for by a Third Party is also permissible. Attendance on trips sponsored by a Third Party must be disclosed to your supervisor and to your local Regional Compliance Officer or Group Compliance Program Coordinator.

Outside Employment

While employed by the Company, employees are prohibited from serving as an employee, officer, director, or consultant with or on behalf of a competitor or current or prospective supplier, distributor, vendor, or landlord.

Performing non-Company work on Company time or on Company premises is also prohibited. Employees may only receive compensation from the Company when executing work duties. For example, you may not receive compensation for speaking engagements when you are invited as a representative of the Company. Any remuneration received for such engagements must be promptly disclosed and paid to the Company. Participation in a trade association, professional society, or charitable organization on a non-compensated basis generally does not create a conflict of interest.

Investments

Employees may not hold or acquire any investment or financial interest in a Third Party without written approval from the local Regional Compliance Officer or Group Compliance Program Coordinator. However, employees may hold investments in publicly traded companies, provided that if such investments exceed one percent (1%) of the total ownership of such companies, such investment must be disclosed in writing to the local Regional Compliance Officer or Group Compliance Program Coordinator. An Association is considered to have an investment or financial interest in a Third Party if any members of the employee's immediate or close family have such a financial interest.

Doing Business with Spouses, Relatives or Friends

Avoid situations where personal interests conflict with, or appear to conflict with, those of the Company. Employees with family members or friends working for a Third Party must recuse themselves from decisions on behalf of the Company involving such Third Party.

Corporate Opportunities

Employees may not divert to themselves the benefit of any venture, opportunity, or potential opportunity in any of the Company's lines of business discovered by using Company property or information, or because of his or her position with the Company.

BRIBERY, KICKBACKS, AND FRAUD

ALBAUGH has zero tolerance for the commission or concealment of fraud. Offering or accepting bribes, kickbacks, or payoffs to or from a past, current or potential agent, supplier, dealer, distributor, customer or competitor or any other party with a business relationship with the Company to obtain, influence, or maintain a transaction or relationship is prohibited.

Payments to Government Agents

When conducting business, you must be sensitive to legal requirements and laws that apply to payments to agents of government, including the U.S. Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act of 2010, the PRC Criminal Code, the Argentine Criminal Code, Brazilian Penal Code Article 333, the Colombian Anti-Bribery Statute, the Indian Prevention of Corruption Act 1988, the Mexican Federal Criminal Code Article 222, the Spanish Criminal Code, and other local analogues. For example, the FCPA makes it unlawful to pay or give anything of value to foreign government officials to obtain or retain business or secure any improper advantage. This includes making improper payments through intermediaries such as sales representatives or consultants. The fact that such activities may be accepted local practice in a country does not relieve you from complying with the applicable laws. Proposed transactions with Third Parties in which a government official has a personal interest must be disclosed to the local Regional Compliance Officer or Group Compliance Program Coordinator prior to entering into such transactions.

Commission or fee arrangements

Commission and fee arrangements must be made only with bona fide commercial representatives, agents or consultants, must be in writing, and the commission or fee reasonable and consistent with normal industry practice. No payment may be made in cash, and no corporate checks or wire transfers made to "cash," "bearer" or to third party designees other than the party entitled to payment. Inquiry into the reputation and activities of the Company's commercial intermediaries, including agents, consultants, and distributors, should also be made prior to entering into such arrangements.

Political Contributions

The laws of many countries, including but not limited to the US, prohibit the Company from making contributions of money, goods, or services to candidates for office, or any committees supporting such candidates or parties, and no person may lawfully do so on the Company's behalf. This Code does not prohibit political contributions by individuals on their own behalf and in their individual capacity.

Reporting Fraud or Improper Payments

All employees have a shared responsibility for safeguarding the Company from fraud. All employees are therefore responsible for reporting known instances or concerns they have or information provided to them about possible fraud or attempted fraud by any employee, Third Party, or other party having any connection to the Company. Report any actual or attempted bribery, kickback, or fraud to the local Regional Compliance Officer, Group Compliance Program Coordinator (crystalk@albaughllc.com), or the Ethics Hotline.

COMPETITION, ANTITRUST & FAIR TRADE

Company policy is to comply fully with all applicable antitrust laws in each of the markets in which it operates. Antitrust laws prohibit agreements among actual or potential competitors to fix or control prices, fix bids, allocate or apportion markets, boycott specific suppliers or customers, or limit production and sale. Accordingly, this Code also explicitly prohibits any such agreements. Avoid any communication—written or verbal—that could be interpreted as a request or agreement to restrain trade or fix prices, to include sharing information on production or import volumes or costs of production. Violation of antitrust laws is a crime and will result in disciplinary action, including but not limited to dismissal from employment, and may further result in the institution of civil or criminal legal proceedings to redress such violations.

The laws of antitrust may also regulate other commercial activities, including but not limited to such things as product bundling, price discrimination, costs or terms of sale, product warranties, or controlling product quality. Therefore, employees should contact the local Regional Compliance Officer, Group Compliance Program Coordinator or Legal Department for advice and consultation before engaging in any of the following activities with a competitor: (i) discussing a potential merger, acquisition, or joint venture; (ii) standardizing products, processes, materials or services; (iii) collecting and disseminating industry statistics; or (iv) discussing product safety matters. Other commercial programs involving discrimination among customers in product offerings, prices or other terms of sale, or involving co-promotion of multiple products or product lines, should also be reviewed by the local Regional Compliance Officer, Group Compliance Program Coordinator or Legal Department prior to initiation.

The antitrust laws of many countries apply to conduct occurring outside the territory of such countries, if such conduct has or could have a direct, substantial and reasonably foreseeable effect on commerce within such country. Therefore, it is important to consider all potentially applicable laws in evaluating a given transaction. Hence, the advice of your local Regional Compliance Officer, Group Compliance Program Coordinator or Legal Department should be obtained with respect to international commercial activities involving the sorts of conduct described above.

EQUAL OPPORTUNITY AND RESPECT IN THE WORKPLACE

The Company provides equal employment opportunities to all employees without regard to race, religion, national origin, ethnicity, age, gender, pregnancy, sexual orientation, disability, marital status, service in armed forces, and/or any other basis prohibited by applicable law. This policy applies to all aspects of employment, including recruiting, hiring, transfers, promotions, compensation, discipline, and termination. The Company is also committed to providing work environments free of discrimination and harassment, including but not limited to harassment based on gender, race, religion, national origin, ethnicity, age, pregnancy, sexual orientation, disability, marital status, service in armed forces, and/or any other basis prohibited by applicable law.

The Company intends to provide a work environment that is pleasant, healthful, comfortable, and free from intimidation, hostility or other offenses which might interfere with work performance. Harassment of any sort – verbal, physical, visual, whether delivered in person, or by electronic device, during or after business hours, whether using company or personal electronic devices -- will not be tolerated. All employees shall be treated with fairness, respect and dignity.

"Harassment" may consist of any kind of unwelcome conduct or communication which is based on an individual's protected status, such as sex, race, color, ancestry, national origin, religion, age, physical or mental disability, or any other protected group status, and that results in a tangible employment action or that is severe or pervasive enough that it creates an intimidating, coercive, hostile, or offensive working environment. Forms of harassment include, but are not limited to bullying, name-calling; derogatory jokes; language or curses related to a protected status; and similar types of conduct that have the purpose or effect of creating an intimidating, hostile or offensive working environment.

Sexual harassment is a specific type of workplace harassment and consists of unwelcome sexual advances, requests for sexual favors, and other verbal, visual or physical conduct of a sexual nature when (1) submission to or rejection of this conduct is used explicitly or implicitly as a factor in decisions affecting hiring, evaluation, promotion or other tangible employment actions, or (2) such conduct is severe or pervasive enough to interfere with an individual's work performance or otherwise render the workplace intimidating, coercive, hostile or offensive to the reasonable person. Sexual harassment may be engaged in by either men or women and may be directed against men or women, regardless of sexual orientation.

All employees of the Company, and particularly managers and supervisors, have a responsibility for keeping our work environment free of harassment. Any employee, who becomes aware of an incident of harassment, whether by witnessing the incident or being told of it, has a duty to report it to their immediate supervisor or the Human Resources Department. Likewise, any supervisor or manager who becomes aware of possible sexual or other unlawful harassment must immediately advise the Human Resources Department, so it can be investigated in a timely and confidential manner. Retaliation against any individual who makes a good faith complaint or provides any information regarding harassment, including participation in a harassment investigation, will not be tolerated.

Employees' conduct is governed both by the principles set forth in this Code of Ethics and in specific policies that are implemented in our several operating companies. Such policies are available for review in the offices of our operating companies charged with administration of human resources policies.

WAGE/HOUR COMPLIANCE

The Company is committed to complying with all applicable local, state and federal wage and hour laws. The Company's particular implementation of this principle is set forth in specific policies that are available for review in the offices of our operating companies charged with administration of human resources policies.

No Forced or Child Labor

It is further the Company's policy to prohibit any form of forced or child labor and to work only with vendors who abide by similar standards of conduct. The Company Supplier Code of Conduct is available on the Company website (Albaugh Supplier Code of Conduct) or by scanning the QR Code provided here. All suppliers are required to conduct themselves in a manner that complies with all applicable laws and regulations that apply to their locations and workplaces and adhere to internationally recognized labor, ethics, and environmental standards.

ENVIRONMENT, HEALTH AND SAFETY

ALBAUGH is committed to conducting its business in a safe and environmentally sustainable manner that promotes the health of our employees, customers and communities. Hence, the Company will:

- Comply with all applicable environmental, health and safety (EHS) laws and regulations, and other standards to which the Company may subscribe in regions where it operates.
- Ensure that employees are properly trained in such requirements.
- Conduct audits and implement practices to ensure such compliance.
- Strive to improve our performance over time and establish EHS policies, procedures, goals, objectives and targets to achieve such improvements.
- Work to instill a culture throughout all levels of the organization to continually identify, reduce and manage safety and health risks and reduce waste.
- Strive to make continual progress toward the goal of no accidents, injuries or harm to human health and the environment from products and operations.
- Responding to EHS concerns about our products or operations raised by employees, customers, or community members.

Each of our operating companies has adopted specific policies to govern EHS considerations, and employees are responsible for knowing and abiding by such policies governing their respective workplaces.

USE AND PROTECTION OF COMPANY ASSETS

Theft, embezzlement, or misappropriation of Company property is prohibited. Company property includes products, samples, supplies, intellectual property (including trademarks, logos, and trade names) company cars, and corporate credit cards. Such property must be used only for legitimate business purposes and may not be sold, loaned, given away or disposed of, regardless of condition or value, without proper authorization. Employees are also prohibited from using Company property for their own advantage or benefit, including with respect to any outside business or other employment.

The Company's computer systems, including e-mail, telephone, cellular phones, tablets, wireless devices, and the internet (collectively, the "Computer Systems"), are also Company property. Computer Systems may be provided to employees for the sole purpose of conducting Company business, and the use of such Computer Systems for other than business-related purposes is prohibited. The Company recognizes that reasonable, non-excess use of Computer Systems for personal reasons (e.g. occasional personal telephone calls) is acceptable. The nature of communications conducted over the Computer System must be professional (not harassing, offensive, threatening, discriminatory, etc.) at all times.

The Company's Data Security Policy is global in scope and requires all users of our computer networks and devices to adhere to certain standards and safeguards to protect the Company's confidential business information, which we all handle in the course of our jobs every day. Among other things, all employees have a responsibility to ensure that the computers, laptops, cellular telephones, tablets, and other devices used to accomplish the work of the Company are used in a manner so, as not to create risks of unauthorized disclosure of such confidential information. The Data Security Policy may be viewed on SuccessFactors ("View Company Documents" → "Policy").

USE AND DISCLOSURE OF CONFIDENTIAL INFORMATION

Confidential Information

Employees may be exposed to confidential information of the Company during employment. "Confidential information" is defined as all non-public information that might be of use to competitors or harmful to the Company if disclosed, and includes strategic plans, sales figures, financial information, marketing plans and strategies, brand development, quality assurance manuals, product lines or designs, formulas, patents, proprietary software, information regarding negotiations, agreements or dealings between the Company and others, and employee-related information.

Confidential information is Company property and subject to all of the restrictions on the use of Company property set forth elsewhere in this Code. In particular, employees must not (a) use confidential information for personal gain, or (b) provide confidential information to Third Parties or others except for business reasons and subject to adequate confidentiality safeguards. All outside requests for confidential information must be referred to the local or Group Legal Department for review and action, i.e. negotiation of appropriate confidentiality agreements or protective orders.

Information concerning the Company's business must not be forwarded to, or stored in, an employee's personal or other non-Company computer systems, including but not limited to home computers or personal e-mail accounts.

Data Privacy Laws

The Company complies with all applicable privacy laws, including laws regulating the privacy of personal, employment, financial or medical information of its employees. A variety of physical, electronic, and procedural safeguards exist to maintain the safety of this information. The use or disclosure of such information contrary to the requirements of such laws and without a business purpose for such disclosure or use is strictly prohibited. https://www.albaugh.com/privacy-policy

Confidential Information of Third Parties

The Company is entrusted from time to time with confidential information pertaining to Third Parties, including agents, vendors, suppliers, customers and consultants, and often gives contractual commitments to protect such information. Efforts to safeguard such information similar to those taken to safeguard the Company's own confidential information must be taken. Employees are prohibited from obtaining confidential information about Third Parties by improper means, including stealing, bribery, misrepresentations, hidden cameras, and any other manner of fraud or deception, including confidential information obtained from a Third Party while in the employ of such Third Party and taken without authorization.

IMPORT AND EXPORT CONTROLS

The laws of certain countries may prohibit the Company from doing business, directly or indirectly, with persons or entities located in certain other countries. For example, the laws of the U.S. preclude the Company from selling products to companies located in countries against which the US government has imposed comprehensive economic sanctions (Iran, Syria, Cuba, North Korea, and the Crimea, Donetsk, and Luhansk regions of Ukraine). The Group Compliance Program Coordinator maintains a list of blocked countries and will update and communicate this list within the Company from time to time, and employees must take care not to engage in activities involving business on behalf of the Company with Third Parties or others located in such blocked countries. Where an employee is engaged in transactions with companies in the business of brokering resales of the Company's products, the employee should determine the ultimate destination for the Company's products and advise such brokers of the Company's obligations with respect to such sanctions laws.

In addition, it is Company policy to comply with applicable anti-boycott laws. A "boycott" is a refusal to ship goods into a specific country or do business in such country. Anti-boycott laws are intended to prevent companies from taking any action in support of a boycott imposed by one country upon a country that is friendly to the U.S. We are required to report to the U.S. government any request to participate in a boycott. Requests are often found in letters of credit, shipping instructions, certificates of origin, and other contract-related documents.

REPORTING POLICY VIOLATIONS

It is important to promptly report any situation which may violate the provisions of applicable law or Company policy, including this Code, whether you are involved in the situation or not. It is generally advised that you first report a suspected violation to your immediate supervisor. If this is not a viable option, report it to your supervisor's manager, or to the local or Group Human Resources Department, local Regional Compliance Officer, Group Compliance Program Coordinator or Legal Department.

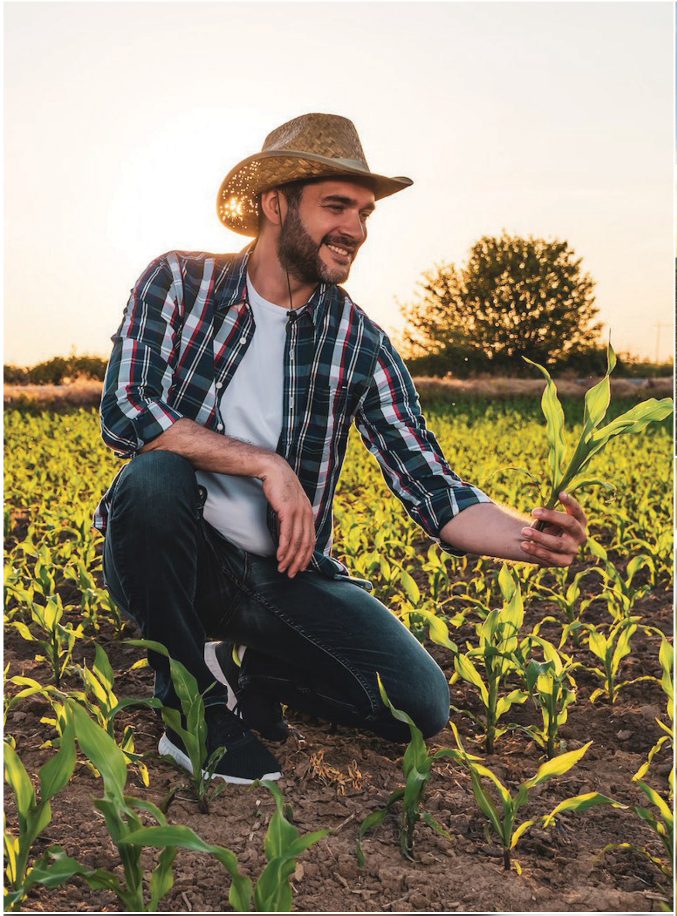
COMPANY RESPONSE & DISCIPLINARY ACTION

Reports or complaints are referred to the Regional Compliance Officer or the Group Compliance Program Coordinator, depending upon the nature and subject matter of the complaint, potential legal implications, or the individual(s) involved. Whenever appropriate, the Company will provide the employee with the status of the investigation and the outcome.

Management, in consultation with the Human Resources Department, local Regional Compliance Officer, Group Compliance Program Coordinator and/or Legal Department, will take appropriate corrective action, up to and including termination of employment, in connection with a violation of the Code. The following actions may result in corrective actions: i) violation of the law or Company policy, including requesting others to do so; (ii) failure to report a suspected violation of Company policy; (iii) failure to effectively monitor compliance with Company policies and applicable law by subordinates; (iv) failure to cooperate in an investigation; or (v) retaliation against an employee who makes a complaint or cooperates in an investigation. Conduct that violates this Code may also be referred for legal action, including criminal or civil proceedings.

NO RETALIATION

The Company will take no adverse action or retribution against an employee for reporting, in good faith, any concerns or possible violations of the Code, Company policy, or the law.



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ALBAUGH®
your alternative