

REVISION HISTORY TABLE

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CODE OF CONDUCT

We are committed at being an exemplary business entity through honesty, integrity, character, and responsibility. We achieve this commitment through the following principles and actions:

- ✓ Comply with All Laws and Regulations
- ✓ Treat All Employees with Dignity, Respect and Equality
- ✓ Compete Fairly
- ✓ Provide A Safe Workplace
- ✓ Protect the Environment
- ✓ Protect Country, Customer and Company Sensitive Information
- ✓ Perform with Excellence


Jennifer Rankin
CEO

1.0 Compliance with Laws

We are committed to full compliance with all laws and regulations applicable to our business. When conducting international business, we comply with all applicable laws and regulations.

1.1 Maintain Accurate Records

We are focused on creating accurate records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction are fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, records will be retained based on the contractual or applicable retention requirements as defined by each customer or contract. Standard record retention is defined in company procedures.

1.2 Sub-Tier Suppliers

We make available to our suppliers a copy of our Code of Conduct and flow down requirements that suppliers adhere to the defined terms and conditions as or referenced on each purchasing record in accordance with company procedures.

2.0 Human Rights

We are committed to treat all employees with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture.

2.1 Child Labor

We do not use illegal child labor in the performance of work and flow down to our suppliers any appropriate laws and restrictions governing the use of child labor.

2.2 Human Trafficking

We adhere to all regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate. We will not violate the rights of others and we will address any adverse human rights impacts of our operations during scheduled Management Review meetings. Appropriate employees are educated on prohibited trafficking activities, discipline employees found to have violated the law or rules and notify the contracting officer of violations and action taken against employees. We are committed to open and available information and communications.

- We will not destroy, conceal, or confiscate the identity or immigration documents;
- We will not use misleading or fraudulent tactics in recruiting;
- We will not charge employee recruitment fees or providing inadequate housing based on local standards, laws and directives;
- We will provide employment contracts and other documentation in the employee's native language;

- We will provide return transportation upon the end of employment for employees brought to the country for the purpose of working on a U.S. government contract or subcontract; and
- We will interview, protect and report employees suspected of being trafficking victims.

3.0 Employment Practices

3.1 Harassment

We ensure that our employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct. We will not tolerate harassment of any kind and take swift disciplinary actions against any person violating harassment policies as defined within.

3.2 Non-Discrimination

We provide equal employment opportunity to employees and applicants for employment, without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability, so long as the essential functions of the job can be competently performed with or without reasonable accommodation. Hiring personnel are trained to the regulatory requirements and internal company procedures and expectations.

3.3 Substance Abuse

We maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances. Any violation of this policy can result in immediate termination and formal notification to local authorities.

Persons with authorized prescriptions for specific controlled substances will be allowed to follow medical recommendations and will be prohibited from performing certain tasks deemed "unsafe" by company management.

3.4 Safety

We maintain a safe work environment to ensure all personnel (employees, contractors, customers and other visitors) are protected from potential injury. If a condition and process require special safety precautions or equipment, training and equipment will be provided.

Carrying firearms is acceptable on company property if the individual is appropriately licensed to do so and will be concealed unless otherwise communicated by management that open-carry is allowed. Concealed firearms are only approved at company facility and approval does not include travel to customers, suppliers, or other states and countries. Rules and regulations for concealed carry will be up to the customer, supplier, state or country in question and will be the responsibility of the individual for ensuring compliance and following those established laws. The company is not liable for any penalties of firearm carry violations due to an individual's negligence.

3.5 Work Schedule

Employees are expected to adhere to established work schedules as defined and approved by company management. Habitual absences, late arrivals, and early departures can result in disciplinary action leading up to termination.

Standard holidays are observed and will be posted/communicated to all personnel in a timely manner.

Paid Time Off (PTO) is a benefit the company provides with appropriate advanced notice and planning, when possible. The amount of PTO for each employee can differ based on management direction, position, and seniority. Upon separation, the company is under no legal obligation to compensate for any unused PTO.

3.6 Disciplinary Action

Violations of any policy and guidelines found within this document can result in immediate termination and potential legal action.

Continued problems and issues that challenge the rules and guidelines within this document can also lead to termination.

Isolated incidents will be documented, and action plans put in place to correct the condition noted.

4.0 Anti-Corruption

4.1 Anti-Corruption Laws

We comply with the anti-corruption laws, directives and/or regulations that govern operations in the countries in which we do business, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

We do not offer or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other influential persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity may not violate local law. Personal safety payments may be necessary where there is an imminent threat to health or safety.

We exert due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of consultant

4.2 Illegal Payments

We do not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives or others. The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such activity may not violate local law.

4.3 Anti-Trust

We do not fix prices or rig bids with our competitors. We do not exchange current, recent, or future pricing information with competitors. We do not participate in a cartel.

4.4 Gifts/Business Courtesies

We compete on the merits of our products and services. The exchange of business courtesies is not used to gain an unfair competitive advantage. We ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practices.

Donations are not considered a gift or business courtesy and does not violate 4.4 above.

4.5 Insider Trading

We will not use material, non-publicly disclosed information obtained in the course of their business relationship with customers as the basis for trading or for enabling others to trade in the securities of our company or those of any other company.

5.0 Conflict of Interest

We avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in our dealings with our company. We provide notification to all affected parties if an actual or potential conflict of interest arises. This includes a conflict between the interests of our company and personal interests or those of close relatives, friends or associates. Conflicts of Interest can arise from relationships, multiple employments, stock holdings, etc.

6.0 Information Protection

6.1 Confidential/Proprietary Information

We handle sensitive information, including confidential, proprietary, and personal information in the upmost care and protection possible and appropriate. Information is not used for any purpose (e.g., advertisement, publicity, and the like) other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information.

6.2 Intellectual Property

We respect and comply with all the laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

6.3 Information Security

We protect the confidential and proprietary information of others, including personal information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures. We comply with all applicable data privacy laws. We assure extension of this requirement to all sub-tier sources they employ. Our computer systems are monitored, tested, backed-up and secured by reputable protective services.

7.0 Environment, Health, and Safety

We operate in a manner that actively manages risk, conserves natural resources, and protects the environment. We apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential risk from regulatory non-compliance, reputational loss, and opportunities for business growth through operational and product stewardship.

We comply with all applicable environmental, health and safety laws, regulations, and directives. We protect the health, safety, and welfare of our employees, visitors, and others who may be affected by our activities.

8.0 Global Trade Compliance

8.1 Security

We have implemented practices and procedures to ensure the security of our supply chains in accordance with appropriate Customs-Trade Partnership Against Terrorism initiative of the United States Department of Homeland Security.

8.2 Imports

We ensure that our business practices are in accordance with all applicable laws, directives and regulations governing the import of parts, components, and technical data.

8.3 Exports

We ensure that our business practices are in accordance with all applicable laws, directives and regulations governing the export of parts, components, and technical data.

8.4 Anti-Boycott

We do not participate in, cooperate with, or further the cause of any unsanctioned foreign economic boycott, in accordance with the 1977 Export Administration Act and the 1976 Tax Reform Act.

8.5 Conflict of Minerals

We adhere to all federal laws and regulations requiring reporting companies to make specialized disclosure and conduct due diligence concerning their use of conflict minerals that may have originated in the Democratic Republic of the Congo (DRC) or an adjoining country. Conflict minerals include cassiterite, columbite-tantalite, gold and wolframite, or their derivatives (tantalum, tin, and tungsten). Under the Securities Exchange Act of 1934, reporting companies that manufacture or contract to manufacture products that contain conflict minerals must conduct due diligence on the source and chain of custody of the applicable conflict minerals and file a report with the SEC by May 31, 2014. We apply due diligence to meet our obligations through controlled procurement practices that ensures that all products are responsibly manufactured.

9.0 Quality

We ensure our work product meets our company's quality standards. We have in-place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements. Our Quality Management System is third-party certified and receives routine audits to ensure compliance and improvement. Additionally, internal audits are performed to identify any non-compliance issues and to identify any opportunities for improvement.

9.1 Counterfeit Parts

We have developed, implemented, and maintain methods and processes appropriate to our products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes are in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product. The specifics of our controls provided (internally and with our suppliers) are defined within our Counterfeit Parts Prevention procedure.

9.2 Quality Management System

We have developed, implemented, and maintain a Quality Management System that is focused on product quality compliance and continuous improvement through effective processes, appropriate verifications, improvement targets and routine performance reviews.

10.0 Ethics Program Expectations

10.1 Whistleblower Protection

We provide our employees avenues (confidentially and/or anonymously) for raising legal or ethical issues or concerns without fear of retaliation. We take action to prevent, detect, and correct any retaliatory actions.

10.2 Consequences for Violating Code

In the event of a violation of any of the above expectations, we may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, we may be required to report those violations to proper authorities. We reserve the right to terminate our relationship with any supplier under the terms of the existing procurement/purchasing contract.

10.3 Ethics Policies

Our Ethics includes guidance, reinforcement, preemptive measures, due diligence, accountability and improvement as seen in the model below.



Additionally, we have management systems in place to support compliance with laws, regulations, and the expectations related to or addressed expressly within this Code of Conduct. We have implemented our code of conduct and appropriately flow down the principles of a code of conduct to the entities that furnish us with goods and services.

We take Ethics and Ethical Behavior very seriously.

Please sign and date the CP-01 Agreement form (company form QF-031) showing you have read and understand all rules and guidelines defined within.

RELATED DOCUMENTATION

OM-100, Operations Manual
QP-01, Document Control
QP-02, Records Control
QP-03, Sales & Planning
QP-06, Purchasing
QP-10, Internal Audits
QP-11, Corrective Actions
QP-12, Management Review
QP-15, Counterfeit Prevention
QP-17, Risk Management
QF-031, CP-01 Agreement Form