

### **Business Conduct Policy**

Judco Manufacturing Inc. is committed to conducting its business in conformance with the highest ethical standards and in compliance with all relevant legal and regulatory requirements. Every Judco Team Member has an obligation to ensure that his or her personal conduct complies with Judco's Code of Conduct and ensure that all employees follow up this Code of Conduct and to report known or suspected violations of it. The importance of complying with the Code of Conduct and legal and regulatory requirements has a top priority at Judco. The commitment of all employees and directors to the standards and principals of our Code of Conduct is needed to ensure that the reputation of Judco continues to be one of our most valuable business assets and achieve the Company Mission. There are no circumstances in which straying from the Code of Conduct will benefit our Company.

### **Mission Statement**

Judco Manufacturing's business is to meet the needs of our customers by producing high quality electro/mechanical switch and harness products, and to create new related electrical components. Our success will insure the growth of our company and continuing employment for our work force. Judco's strength is in its innovative design of new products. Our goal is to surpass our current level of technology and quality. We will also strive to augment our strengths by improving our record of on-time delivery and competitive pricing. Judco will continue to expand its position in the marketplace through our commitment to continual quality improvement, ongoing enhancement of production efficiency, and the introduction of superior new products through effective sales and marketing. Judco has built its success through honesty, good faith and fairness, and will always follow these principles. Our actions are based on the belief that traditional moral and ethical values should guide all our dealings with customers, employees and suppliers.

### **Our Values**

Judco has built its success based on:

- Honesty
- Good faith
- Equality

and will always follow those principles. Our actions are based on our belief that **ethics** and ethical values should guide all our business with our customers, employees and suppliers.



## **Code of Conduct**

#### I act with integrity

I know that everything I say and do impacts my reputation – and Judco's reputation. I understand that if my actions negatively affect Judco's interests and reputation, I may be subject to disciplinary action, up to and including dismissal. I am committed to upholding our Values and policies, including the BCP. I am honest and fair in my dealings with colleagues, customers, suppliers, competitors and the community.

#### I speak for myself, not Judco

I know that I should never make public statements about Judco by speaking with the media or through internet-based social networking tools unless I am authorized to do so. If I am not authorized to speak publicly on Judco's behalf, I understand that I should direct any questions or inquiries from the media or others to the Director of Operations.

#### I ensure our financial integrity

As a private company, Judco's records and accounts must conform to our required accounting principles and system of internal controls. I never make false or misleading entries in any financial statements, records and accounts. I fully cooperate with all audits and investigations internally or as requested by external auditors and regulators and provide truthful and accurate information. I never conceal, alter or destroy documents or records that have been lawfully requested or are required as part of an investigation.

#### I make accurate and honest reports

Ensuring accurate and complete business and financial records is not just the responsibility of accounting and finance employees. At Judco, the accuracy of records – from time records and expense reports to benefits claims forms and resumes – is everyone's responsibility. When I keep accurate records and make honest reports, I support Judco's reputation and help ensure that we meet our legal and regulatory obligations. I understand that providing inaccurate or misleading information could lead to civil or criminal action against Judco and me.

#### I am an ethical leader

As a Judco manager, I am expected to be an ethical leader. I am responsible for setting a good example, encouraging an environment of open and honest communication without fear of retaliation and taking prompt action when ethical issues are brought to my attention. Managers are expected to set a tone of integrity, never directing employees to achieve results by taking actions that are in violation of Judco's policies, or the law. Managers also have a responsibility for properly approving a variety of transactions on behalf of Judco. As a manager, I must ensure that policy requirements are met. Business results are never more important than ethical conduct and compliance with Judco's policies, and the law.



#### I support an environment free from discrimination and harassment

Judco is a great place to work when all employees contribute to a safe, clean, healthy and secure environment. We are all accountable for ensuring that our culture is free from discrimination and harassment based on race, color, religion, gender, gender identity, citizenship and/or origin, age, disability, sexual orientation, marital status or other factors. I understand that Judco has zero tolerance for sexual advances, actions, comments or other inappropriate behavior in the workplace that intimidates, offends or otherwise makes an employee feel uncomfortable. A safe and secure workplace also means a workplace free from violence. Threats (implicit or explicit), intimidation, and violence have no place at Judco. When I observe or experience any of the behaviors and activities listed above, I know that it is my duty to report it immediately.

#### I support an environment free from substance abuse

I understand that the use of alcohol, drugs or other intoxicants may interfere with my abilities on the job. Moreover, Judco is committed to a workplace free from intoxicants consistent with applicable laws, and prohibits the distribution, possession or use of illegal or unauthorized alcohol, drugs or other intoxicants on Judco's property. Furthermore, Judco expects an employees' judgment and decision-making to be clear and unimpaired by alcohol, drugs or other intoxicants. In addition to affecting an employee's own work and decision-making capability, the use of intoxicants can create a significant risk to the safety of others and the welfare of our business.

#### I respect privacy and safeguard confidential and proprietary information

At Judco, we respect the privacy of our colleagues, business partners, customers and suppliers. In my day-to-day work life, I may be exposed to personal and business information about our colleagues, customers, suppliers or Judco. This information is confidential and proprietary, and it is my responsibility to protect it by marking it accordingly, keeping it secure and limiting access to those who need it to do their jobs. I collect, use and process this information for legitimate business purposes only. I always handle personal information responsibly, in line with privacy laws and industry best practices, and take care to prevent unauthorized disclosure. My obligation to protect the confidentiality of Judco's proprietary information continues even after my employment ends.



# **Ethics Decision Tree**

