



## Code of Conduct

AE Techron's reputation for reliability and high performance is built on more than solid engineering and manufacturing. Our product integrity is built not only on the quality of AE Techron's products and services but also on our employees' history of honest, ethical and fair relations with its business partners and our suppliers.

Every AE Techron leader, employee and representative is expected to adhere to this Code of Conduct. If you suspect any violations of the Code of Conduct or any other AE Techron policy, you are encouraged to report such activity to your supervisor or department manager. Please take a few moments to review this document. If you have questions, please contact your supervisor.

### Introduction

This Code of Conduct (the "Code") describes the standards of conduct required of each officer, director, supervisor and employee of AE Techron, its representatives and agents around the world. The Code sets forth the basic guiding principles and values of AE Techron and all members of the AE Techron organization. These general principles are supplemented by AE Techron's policies and procedures, which expand upon the objectives in the Code and on your obligations to conduct AE Techron's business with integrity. A copy of the Code is available on AE Techron's website at [www.AETechron.com](http://www.AETechron.com). Other AE Techron policies and procedures are available in the employee manual or can be provided by your supervisor. Any member of the AE Techron organization who fails to comply with the Code or any AE Techron policy or procedure will be subject to appropriate discipline, which may include termination of employment or affiliation with AE Techron. Non-compliance with certain aspects of the Code also may subject the individual offender or AE Techron to civil or criminal liability.

### GLOBAL COMPLIANCE POLICY

Unless previously approved by AE Techron Management, in countries where the Code is more restrictive than local law or practice, AE Techron employees are required to follow the Code, and where applicable laws are more restrictive than the Code, AE Techron employees are required to follow applicable laws. Further, where any provision of the Code requires or permits conduct that would be in violation of any applicable law for that area, employees must always comply with all applicable laws.

### RESPECT FOR THE INDIVIDUAL

Unlawful discrimination in the hiring, promotion, compensation or retention of employees is strictly prohibited. Abusive, harassing or offensive conduct is not permitted, whether verbal or physical. Examples include unwelcome sexual advances and derogatory ethnic or racial comments. Retaliation against any employee for reporting discrimination or harassment will not be tolerated. Any employee feeling her or his work environment is abusive or unsafe can be assured of immediate attention and that they will not be required to work in any environment in which they feel unsafe or harassed.

### HEALTH AND SAFETY

Members of the AE Techron organization must comply with applicable health and safety regulations and AE Techron's policies, procedures and safety initiatives. While on the job, employees must be free from the influence of any substance, legal or illegal, that could create an unsafe environment.

### AVOIDING CONFLICTS OF INTEREST

AE Techron employees must avoid conflicts of interest that may interfere with AE Techron's business interests or with an employee's obligations to AE Techron. Situations that may personally benefit the employee, the employee's

friends or family or that may potentially interfere with AE Techron's business interests might be construed as conflicts of interest. It would not be possible to reference every scenario giving rise to a potential conflict, however some examples of situations that could create a conflict of interest include:

- Competing with AE Techron in another business venture
- Owning or investing in a competitor or supplier of AE Techron (other than as a passive investor in a publicly traded company)
- Using AE Techron confidential information or other AE Techron assets for personal gain

Any activity that may give rise to a conflict of interest must be promptly and fully disclosed to the AE Techron Management. It will then be determined whether an actual conflict exists.

#### FAIR DEALING

All AE Techron employees must deal fairly and in good faith with AE Techron's customers, suppliers, competitors, and others. AE Techron representatives may not take unfair advantage of a business relationship through illegal conduct, deceit or any other unfair practice. Members of the AE Techron organization are required to comply with all applicable laws protecting fair competition. AE Techron employees shall not enter any agreement, written or implied, with a competitor about pricing, costs, terms, markets, production, customers or any other matter that could impact competition. Employees shall not exchange information about prices or production with a competitor. Any agreement with a competitor must be approved by the Law Department.

#### PROTECTION OF CONFIDENTIAL AND PROPRIETARY INFORMATION

AE Techron employees have a duty to safeguard AE Techron's property, including proprietary and confidential information. Proprietary and confidential information that must be protected includes without limitation technical information, information about products, operations, personnel, marketing plans, production plans, customer and supplier data, pricing information, trade secrets and other information AE Techron uses to conduct its business. This information must not be disclosed to third parties without prior authorization and must not be used for personal gain. The obligation to protect this information continues after employment with AE Techron ends.

#### ELECTRONIC COMMUNICATION AND COMMUNICATION EQUIPMENT

AE Techron's telephones, cellular devices, computers and other communication equipment should be used primarily to conduct company business. AE Techron allows reasonable and limited personal use of AE Techron electronic resources by employees. Employee personal use is a privilege and must not unduly burden AE Techron's resources and systems. Personal use must also comply with all laws and AE Techron policies, and not interfere with normal business activities or the employee's ability to meet job expectations. Email, voicemail and other forms of communications stored on AE Techron's equipment are considered records of AE Techron and may be retrieved and disclosed by AE Techron as necessary and appropriate for business and legal purposes. Employees should not have an expectation of privacy in connection with personal items or information stored on equipment owned by AE Techron.

#### RECORD CREATION AND RETENTION

AE Techron's books, records, and reports must be complete and accurate. Non-compliance with this policy must be immediately reported. AE Techron's records must be retained, discarded or destroyed only in accordance with applicable laws, regulations and AE Techron's policies and procedures.

Reporting Concerns and Asking Questions:

Contact:

AE Techron

574-295-9495