



# Ethics

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We are a VALUE BASED COMPANY. Whether you are new to the Company or you are an existing employee, the Company is committed to fostering a culture where loyalty, integrity and teamwork is valued and provides the foundation for all actions and decisions. The Company values and encourages open and honest communication where all employees understand the importance of demonstrating ethical behavior in all that we do. The Company point of contact for ethics is the Executive Vice President. Also, the Company will establish a link on the intranet site with contact information and general information for employees who wish to report a violation of the law or policy or need information and advice. There will be no retaliation for filing a complaint of unlawful or unethical behavior.

## 4-Point Strategy:

1. The President is responsible for establishing systems to provide advice and confidential assistance to employees. Also, supervisors are responsible for new employees reading and understanding all aspects of the Employee Handbook.
2. Employees are expected to know and comply with all Company policies and procedures outlined in the Employee Handbook and those specified by their supervisor. Employees are encouraged to address questions or concerns with their supervisors and report any violations of the law or violations of Company policy.
3. Senior Leadership labs and professional education will include a focus in ethics and compliance strategies in company leadership and management programs at least twice a year.
4. Periodic audits and evaluation of systems will be conducted by the Company to ensure compliance. Corrective action will be imposed for conduct deemed to be a violation of the standards of conduct.

## Uphold the Law

Grunau Company's commitment to integrity begins with complying with laws, rules, and regulations where we do business. Further, each of us must have an understanding of the Company policies, laws, rules and regulations that apply to our specific roles. We are responsible for reporting to the appropriate authority any violations of the law of which we are aware.



## Ethics (Continued)

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### Competition

We are dedicated to ethical, fair, and vigorous competition. We will sell products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not unlawfully cooperate or coordinate our activities with our competitors. We will not offer or solicit unlawful payments or gratuities in connection with the purchase of goods or services or the sales of our products or services, nor will we engage or assist in unlawful boycotts of particular customers.

### Offering Business Courtesies

As a Grunau Company employee, it is your responsibility to ask questions about the recipient organization's ethics policies before any courtesies are offered. Any employee who offers a Business Courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon the Company.

Other than any future government customers, for whom special rules apply, we may provide non-monetary gifts (i.e. company logo apparel or similar promotional items) to our customers. Further, your supervisor may approve the furnishing to others of occasional meals, refreshments, entertainments, gifts and similar Business Courtesies of reasonable value provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The Business Courtesy is consistent with industry practice, is infrequent in nature and not lavish.
- The Business Courtesy is properly reflected on the books and records of Grunau Company, Inc.

Refer to the "Conflicting Outside Interests Policy" in this Handbook for rules when an employee is offered a Business Courtesy by a customer or prospective customer or vendor.

### Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are legally complete, accurate, and timely. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal is an excuse for misrepresenting the facts or falsifying records.



## Ethics (Continued)

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### Corporate Recordkeeping

We create, retain and dispose of our Company records as part of our normal course of business in compliance with Company policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and Company data must be promptly and accurately entered in our financial books in accordance with Company and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any authorized audit, nor interfere with any auditor engaged to perform an internal independent audit of books, records, processes or internal records.