



## MA 4.4.1 Rev A Appendix C

### Code of Conduct and Ethics Policy

It is important that we all understand our obligation to conduct business in a way that is both ethical and consistent with our corporate policies. Today, as industry continues to become more complex and challenging, it is important that we all understand our obligation to conduct business in a way that is both ethical and consistent with our corporate policies. The core values and business principles of **J & F Machine Inc. Inc.'s** culture are reinforced by our Code of Conduct and Ethics. This Code acts as a guide to help us maintain our ethical standards.

**J & F Machine Inc.** expects and requires every employee to act in accordance with applicable law and consistent with our core values and business principles. We also expect our vendors, consultants, independent contractors, agents and other representatives to meet these standards. Violations of this Code will lead to disciplinary action for employees, up to and including dismissal, and may result in termination of our relationship with third parties.

This standard applies to how **J & F Machine Inc.** expects owners, supervisors and employees to:

- Conduct business
- Treat one another in the workplace
- Conduct business with integrity, fairness and respect
- Comply with anti-bribery laws
- Manage our environmental and health & occupational safety responsibilities
- Protect personal Information
- Engage with competitors
- Respect human rights
- Maintain privacy of confidential information, personal, corporate, vendors and customers
- Interact with government officials
- Maintain reasonable guidelines for gifts, meals and entertainment
- Report Code of Conduct and Ethics concerns

Each of us is responsible for acting with honesty and integrity and making the ethical choice all the time. It is a key part of our job. **J & F Machine Inc.'s** management team is committed to providing the necessary training and ongoing support to enable us to succeed in this area.

**J & F Machine Inc.** expects all employees to understand the Code of Conduct and Ethics and to always act in an ethical and honest way. Making the right choices and following the laws and regulations that govern our business are critically important to our success, now, and in the future.

**J & F Machine Inc.** relies on its employees to help us drive integrity throughout the organization. We are asking you:

- To understand that we have a Code of Conduct and Ethics policy
- To speak up if you believe a possible violation of the Code of Conduct and Ethics may have occurred, or if you have a question about the Code of Conduct or Ethics
- To live the basic principles that make up the Code of Conduct and Ethics, every day



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### Expectations of Our Owners and Supervisors

As leaders of the company, **J & F Machine Inc.** owners and supervisors are expected to set the highest ethical standard for themselves, in turn setting an example for various teams to follow. **J & F Machine Inc.**'s leaders are also expected to be diligent and alert to any potential violations of the Code of Ethics and to report concerns on a timely basis to the owners and or managers. The owners and supervisors shall maintain an environment in which employees can feel comfortable raising concerns when they see or hear them. This leadership by example is important in establishing and maintaining **J & F Machine Inc.**'s Code of Conduct and Ethics.

### Conducting Business with Integrity, Fairness and Respect

Our operating philosophy is that all of us, employees, and management alike, share in the responsibility to ensure **J & F Machine Inc.**'s success. To live up to this responsibility, we must all act with integrity. This means that we obey the laws of the United States that apply to us, uphold this Code of Conduct, and honor our commitments to our customers, our vendors and local business community. We are fair in our dealings with employees, customers, suppliers and other stakeholders. It is also essential that we respect others who may have different thoughts and opinions, act with sensitivity and concern toward the cultures and customs of countries in which we operate and strive to consider our impact on the communities and environments where we conduct business.

### Compliance with Anti-Bribery Laws

We do not offer or accept *bribes* or *kickbacks*, either directly or through *third parties*. In giving or accepting *things of value*, we think about whether doing so could influence a business decision or give others that impression. We must also always ensure that the records of all payments we make are accurate and complete. These obligations apply in all cases but are especially strict in matters involving all *government officials*. Our commitment to anti-bribery applies, to **J & F Machine Inc.**, at all locations, no matter what the local laws or cultural practices may be. We also expect any third parties acting on our behalf to uphold this principle.

### Counterfeit and Fraud Compliance

**J & F Machine Inc.** and its employees are responsible for the detection and prevention of counterfeit and fraud, misappropriations, and other irregularities. Counterfeit and Fraud is defined as the intentional, false representation or concealment of a material fact, either material product or documents for inducing another to act upon it to his or her injury. Should an employee see counterfeit products or fraud being conducted, they are to report the fraud to the owners.

### Conflict Minerals Policy

**J & F Machine Inc.** strives to be a good corporate citizen. We are committed to ensuring the health, safety and protection of people who come into contact with our products and business, and we require high social, environmental and human rights standards among our suppliers. Managing our obligations in relation to Conflict Minerals is a part of our corporate responsibility.



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**J & F Machine Inc.** is proactively supporting development and governance of conflicting minerals. Our commitment includes the following:

**J & F Machine Inc.** is working towards ensuring that our products do not contain Conflict Minerals that have been sourced from mines that support or fund conflict within the Democratic Republic of Congo or adjoining countries. We are committed to:

- identifying which **J & F Machine Inc.** products are impacted and targeting our efforts accordingly
- not buying products and materials containing Conflict Minerals directly from Conflict Mines
- asking our suppliers to work towards ensuring that any Conflict Minerals contained in the products and materials supplied to **J & F Machine Inc.** originate from Conflict Free sources
- contributing to conflict-free trade by encouraging our suppliers not to discriminate against legitimate sources of Conflict Minerals

In addition, we are committed to engaging with our customers regarding their disclosure obligations

### The Environment and Occupational Health and Safety

It is essential that **J & F Machine Inc.** employees work in safe and clean environments. We seek to act in accordance with industry standards in occupational health and safety and environmental responsibility in all our operations. We are committed to meeting all health, safety and environmental laws and regulations that apply to us and seek to monitor and review each operation with a goal of continuous improvement.

### Protection of Personal Information

We respect the privacy of our employees and are committed to protecting their personal information. We will collect, use and disclose personal information only for legitimate business or employment purposes or if required by the law. We also take reasonable steps to protect the confidentiality of personal information we have collected.

### Respect for Human Rights

We respect the human rights of our employees, customers, suppliers and other stakeholders important to our business. We comply with all Federal and State human rights laws and regulations that apply to us. We provide fair working conditions for our employees and do not tolerate the use of child labor or forced labor in our supply chain. We also expect any supplier or other company that we work with to act ethically and to comply with our Code of Ethics and International, Federal and Local laws.

### Anti-Terrorist Policy

The company, employees and our suppliers agrees to comply with United States President, Executive Order Number 13224 – blocking property and prohibiting transactions with persons who commit, threaten to commit or support terrorism, dated 23 September 2001 – and further agrees to include this statement in each lower-tier subcontract or purchase order issued hereunder.



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### **Cyber Security and Use of Confidential Information**

Confidential information is considered a Company asset. This includes company and customer trade secrets and proprietary information relating to **J & F Machine Inc.**, our customers and suppliers, is a valuable part of our business and we are obligated to safeguard our and their product and information. Such information should not be shared with anyone outside **J & F Machine Inc.** unless it is required by law or for an authorized business purpose.

### **Gifts, Meals and Entertainment**

Our relationship with all our business partners, both customers and suppliers and must be based on integrity and good business judgment. As a result, if we give or receive gifts or entertainment, we must be careful not to compromise, or appear to compromise, our commitment to fair dealing and to making decisions that benefit **J & F Machine Inc.**

In our business relationships with customers or suppliers, it is acceptable to give or receive business gifts or entertainment provided they are reasonable, occasional and of modest value. Any gift or entertainment that we provide must be recorded accurately and transparently in our expense reports and **J & F Machine Inc.**'s books and records.

### **Communication**

We must ensure that what we write and say at any time reflects the integrity and standards expected of us. To protect **J & F Machine Inc.**'s reputation and your own, it is important that all of your written communications be prepared with care and with the understanding that they could one day be made public. While you enjoy freedom of speech and all legal entitlements to communicate on the Internet during non-working hours using your own personal computer systems, you must also be careful not to post to social media material that defames the company, disparages suppliers or customers, reveals trade secrets, or violates **J & F Machine Inc.**'s copyrights and patent rights.

Should someone such as a news media reporter, an industry professional or a shareholder asks you to discuss or comment on matters related to **J & F Machine Inc.**, you must refer them to the owners without providing comments.

### **Substance Abuse**

It is the intent of **J & F Machine Inc.** to maintain a workplace that is free of drugs and alcohol and to discourage drug and alcohol abuse by its employees. Employees who are under the influence of a drug or alcohol on the job compromise the Company's interest and endanger their own health and safety and the health and safety of others.

To further its interest in avoiding accidents, to promote and maintain safe and efficient working conditions for its employees, and to protect its business, property, equipment, and operations, the Company has established this Guideline concerning the use of alcohol and drugs. As a condition of continued employment with the Company, each employee must abide by this Guideline.



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For the purpose of this policy, “Illegal Drugs or other controlled substances” means any drug or substance that (a) is not legally obtainable; or (b) is legally obtainable but has not been legally obtained; or (c) has been legally obtained but is being sold or distributed unlawfully. “Legal Drug” means any drug, including any prescription drug or over-the-counter drug, that has been legally obtained and that is not unlawfully sold or distributed.

“Abuse of any legal ‘drug’” means the use of any legal drug (a) for any purpose other than the purpose for which it was prescribed or manufactured; of (b) in a quantity, frequency, or manner that is contrary to the instructions or recommendations of the prescribing physician or manufacturer. “Possession” means that an employee has the substance on his or her person or otherwise under his or her control.

“Reasonable suspicion” includes a suspicion that is based on specific personal observations such as an employee’s manner, disposition, muscular movement, appearance, behavior, speech or breath odor; information provided to management by an employee, by law enforcement officials, by a security service, or by other persons believed to be reliable; or a suspicion that is based on other surrounding circumstances.

#### *Prohibited Conduct*

##### 1. Scope

The prohibitions of this section apply whenever the interest of the Company may be adversely affected, including any time the employee is on Company premises; or conducting or performing Company business, regardless of location.

##### 2. Alcohol

The following acts are prohibited and subject an employee to discharge: the unauthorized use, possession, purchase, sale, manufacture, distribution, transposition, or dispensation of alcohol; or being under the influence of alcohol.

The Company may provide for consumption at certain events, such as social functions. The consumption of alcohol at these events does not violate this policy.

##### 3. Illegal Drugs

The following acts are prohibited and subject an employee to discharge: the use, possession, purchase, sale, manufacture, distribution, transportation, or dispensation of any illegal drug or other controlled substance or being under the influence of any illegal drug or other controlled substance.

##### 4. Legal Drugs

The following acts are prohibited and subject an employee to discharge: the abuse of any legal drug; the purchase, sale, manufacture, distribution, transportation, dispensation, or possession of any legal prescription drug in a manner inconsistent with law; or working while impaired by the use of a legal drug whenever such impairment might (a) endanger the safety of the employee or some other person, (b) pose a risk of significant damage to Company property or equipment or (c) substantially interfere with the employee’s job performance or the efficient operation of the Company’s business or equipment.

Nothing in this Guideline is intended to prohibit the customary and ordinary purchase, sale use, possession, or dispensation of over-the-counter drugs, so long as that activity does not violate any law or result in an employee being impaired by the use of such drugs in violation of this Guideline.



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### **Reporting of Code of Conduct and Ethics Concerns** (*Whistle-blower Policy*)

Employees should never hesitate to report to the owner's, concern about any violations of the Code of Conduct and Ethics. **J & F Machine Inc.** prohibits anyone, owners, managers or employees from retaliating against any employee who reports genuine concerns in good faith. Retaliation can take many forms and includes being penalized, discharged, demoted, suspended, threatened or harassed. We will not tolerate any such retaliatory actions taken against a person who has reported a genuine concern about a violation of the Code of Conduct and Ethics.