

Mindrum Precision, Inc.
Code of Ethics

Code of Ethics and Business Conduct

Build Trust and Credibility - The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders, by adhering to our commitments, honesty and integrity.

Respect for the Individual - Treat everyone with dignity and respect. This is a discrimination free workplace. Any employee who feels harassed or discriminated against should report the incident to his or her manager.

Create a Culture of Open and Honest Communication - Feel free to speak your mind, particularly with respect to ethics concerns. We do not tolerate retaliation against employees who raise ethics concerns in good faith.

Upholding the Law - We must comply with company policies, laws, rules and regulations that apply to our job, and we are responsible for preventing violations of law and for speaking up if we see possible violations.

Competition - We must be ethical, fair and vigorous in competition, with superior quality, and competitive pricing.

Proprietary Information - Respect the property rights and trade secrets of Mindrum and others. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Selective Disclosure - We will not selectively disclose any material nonpublic information with respect to Mindrum, its business operations, plans, financial condition, results of operations or any development plan.

Avoid Conflicts of Interest - Never use company property or information for personal gain. Employees with a conflict of interest question should seek advice from management.

Accepting Business Courtesies - Ok to accept business courtesies from suppliers providing they are reasonable.

Meals, Refreshments, Entertainment and Gifts - Ok to accept gifts from suppliers providing they are reasonable.

Offering Business Courtesies - Ok to offer gifts to customers providing they are within reason and cannot be interpreted as an attempt to gain an unfair business advantage.

Set Metrics and Report Results Accurately - Never misrepresent facts or falsify records.

Corporate Recordkeeping - All recordkeeping must be true, accurate, and completed in a timely manner.

Accountability - All employees are responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. Do not disclose confidential and nonpublic information without a valid business or legal purpose and proper authorization.

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Use of Company Resources - Use good sound judgment to conserve resources (time, material, equipment). Do not use resources on any materials that are harassing, threatening, abusive, sexually explicit or inappropriate.

Compliance - Employees should bring any suspected breach of these codes to management's attention.