



Ethics Policy

1. Overview

Brunk Industries' purpose for this ethics policy is to establish a culture of openness, trust and integrity in business practices. Effective ethics is a team effort involving the participation and support of every Brunk Industries employee. All employees should familiarize themselves with the ethics guidelines that follow this introduction.

Brunk Industries is committed to protecting employees, partners, suppliers and the company from illegal or damaging actions by individuals, either knowingly or unknowingly. When Brunk Industries addresses issues proactively and uses correct judgment, it will help set us apart from competitors.

Brunk Industries will not tolerate any wrongdoing or impropriety at any time. Brunk Industries will take the appropriate measures and act quickly in correcting the issue if the ethical code is broken. Any infractions of this code of ethics will not be tolerated.

2. Purpose

Our purpose for authoring a publication on ethics is to emphasize the employee's, supplier's and customer's expectation to be treated to fair business practices. This policy will serve to guide business behavior to ensure ethical conduct.

3. Scope

This policy applies to employees, contractors, consultants, temporaries and other workers at Brunk Industries, including all personnel affiliated with third parties.

4. Policy

4.1. Executive Commitment to Ethics

- 4.1.1. Executive management within Brunk Industries must set a prime example. In any business practice, honesty and integrity must be top priority for executives.
- 4.1.2. Executives must have an open door policy and welcome suggestions and concerns from employees. This will allow employees to feel comfortable discussing any issues and will alert executives to concerns within the work force.
- 4.1.3. Executives must disclose any conflict of interests regarding their position within Brunk Industries.

4.2. Employee Commitment to Ethics

- 4.2.1. Brunk Industries employees will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.



- 4.2.2. Every employee needs to apply effort and intelligence in maintaining ethical values.
- 4.2.3. Employees must disclose any conflict of interests regard their position within Brunk Industries.
- 4.2.4. Employees will help Brunk Industries to increase customer and supplier satisfaction by providing quality products and timely response to inquiries.

4.3. **Company Awareness**

- 4.3.1. Promotion of ethical conduct within interpersonal communications of employees will be rewarded.
- 4.3.2. Brunk Industries will promote a trustworthy and honest atmosphere to reinforce the vision of ethics within the company.

4.4. **Maintaining Ethical Practices**

- 4.4.1. Brunk Industries will reinforce the importance of the integrity message and the tone will start at the top. Every employee, manager and director needs to consistently maintain an ethical stance and support ethical behavior.
- 4.4.2. Employees at Brunk Industries should encourage open dialogue, get honest feedback and treat everyone fairly, with honesty and objectivity.
- 4.4.3. Brunk Industries has established the Vice President of Finance as the Ethics Representative to make sure the ethical code is delivered to all employees and that concerns regarding the code can be addressed.

4.5. **Unethical Behavior**

- 4.5.1. Brunk Industries will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.
- 4.5.2. Brunk Industries will not tolerate harassment or discrimination.
- 4.5.3. Unauthorized use of company trade secrets & marketing, operational, personnel, financial, source code, customer information & technical information integral to the success of our company will not be tolerated.
- 4.5.4. Brunk Industries will not permit impropriety at any time and we will act ethically and responsibly in accordance with laws.
- 4.5.5. Brunk Industries employees will not use corporate assets or business relationships for personal use or gain.

4.6. **Gifts, Favors, and Payments by the Company: Gifts, favors, and payments may be given to others at Company expense, if they meet all of the following criteria:**

- 4.6.1. They are consistent with accepted and customary business practices.
- 4.6.2. They are of sufficiently limited value and in a form that will not be construed as a bribe or payoff.
- 4.6.3. They are not in violation of applicable law and generally accepted ethical standards.
- 4.6.4. Public disclosure of the facts will not embarrass the Company.



4.6.5. Payments, commissions or other compensation to or for the benefit of associates of customers (or their family members or associates) not required by written contract are contrary to Company policy.

4.7. Gifts, Favors, Entertainment and Payments Received by Company Associates:

4.7.1. Associates shall not seek or accept for themselves or others any gifts, favors, entertainment or payments without a legitimate business purpose, nor shall they seek or accept personal loans (other than conventional loans at market rates from lending institutions) from any person or business organization that does or seeks to do, business with or is a competitor of the Company.

4.7.2. In the application of this policy associates may accept for themselves and members of their families common courtesies usually associated with customary business practices. These include, but are not limited to:

- 4.7.2.1. Lunch and/or dinner with suppliers, sometimes including spouses, as long as the invitation is extended by the supplier.
- 4.7.2.2. Gifts of no more than \$25 from suppliers, such as calendars, pens, pads, knives, etc.
- 4.7.2.3. Tickets to events (such as sports, arts, etc.) are acceptable if offered by the supplier and the supplier accompanies the associate to the event. These are not to be solicited by the company associate and must be approved by the appropriate company officer.
- 4.7.2.4. Overnight outings are acceptable under the condition that individuals from either other companies or the supplier are in attendance. The associate must have prior approval from the appropriate company officer.
- 4.7.2.5. The receipt of alcoholic beverages is prohibited.
- 4.7.2.6. Gifts of perishable items usually given during the holidays such as hams, cookies, nuts, etc., are acceptable.
- 4.7.2.7. A strict standard is expected with respect to gifts, services, discounts, entertainment or considerations of any kind. "Supplier Day" outings such as golf, fishing and hunting are acceptable with prior approval from the appropriate company official. The supplier must be in attendance.
- 4.7.2.8. Use of supplier's real or personal property (vacation homes, etc.) by associates or families for personal use is prohibited. In the event the supplier is present for the duration of the visit, such a situation is acceptable as long as it is only once per year and for limited duration, i.e. a long weekend. The associate must have prior approval from the appropriate company officer.
- 4.7.2.9. It is never permissible to accept a gift in cash or cash equivalent such as stocks or other forms of marketable securities of any amount.
- 4.7.2.10. Management associates should not accept gifts from those under their supervision of more than \$25.

4.8. Conflicts of Interest:



- 4.8.1. Associates should avoid any situation which involves or may involve a conflict between their personal interest and the interest of the Company. As in all other facets of their duties, associates dealing with customers, suppliers, contractors, competitors or any person doing or seeking to do business with the company are to act in the best interest of the company. Each associate shall make prompt and full disclosure in writing to their manager of any potential situation which may involve a conflict of interest. Such conflicts include:
 - 4.8.1.1. Ownership by associate or by a member of their family of a significant interest in any outside enterprise which does, or seeks to do, business with or is a competitor of the company.
 - 4.8.1.2. Serving as a director, officer, partner, consultant or in a managerial or technical capacity with an outside enterprise which does, or is seeking to do, business with or is a competitor of the company. Exceptions to this can be approved by the President.
 - 4.8.1.3. Acting as a broker, finder, go-between or otherwise for the benefit of a third party in transactions involving or potentially involving the Company or its interests.
 - 4.8.1.4. Any other arrangements or circumstances, including family or other personal relationships, which might dissuade the associate from acting in the best interest of the company.

5. Enforcement

- 5.1. Any infractions of this code of ethics will not be tolerated and Brunk Industries will act quickly in correcting the issue if the ethical code is broken.
- 5.2. Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment