



Precision Machining, Inc.

Employee Handbook

Code of Conduct

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Precision Machining, Inc.

CEO Message

Welcome to 3V Precision Machining, Inc.

Here at 3V Precision Machining, Inc. we believe it is everyone's responsibility to make this a great place to work. As such, it is important that we make the environment positive and productive and avoid acting in a way that is detrimental to other team members.

You are expected to contribute to the positive environment. Bring your sense of humor, support your co-workers, and have fun while working hard. As a high-energy organization, we will often engage in activities intended to motivate and energize our employees. However, it is expected that you will conduct yourself in a professional manner at all times.

We welcome constructive input about ways we might improve our methods or systems. Quite often you are in a unique position to see things from a different perspective than your supervisors or peers. Please share your insight.

All 3V Precision Machining's employees are required to read and comply with the policies laid out in this Manual (which may be amended from time to time). This Manual does not attempt to anticipate every situation that may arise and does not relieve employees of their obligation to use common sense and good judgment. Each employee is responsible for raising questions regarding the manual, prior to signing the acknowledgement on the back page. If you do not raise any questions we will assume that you have a full understanding of all the policies and procedures.

Peter R. Boucher

Chief Executive Officer and President

Attendance and Working Expectations

Working in a group environment means taking responsibility for contributing to the group. Lateness or unexplained absence can negatively affect the group's dynamic. All employees are expected to be on time and to work their full number of allotted hours (unless the employee is ill, has a family emergency, or absence has been prearranged).

You may often be allowed to work beyond your scheduled hours to make up for time off; however, this arrangement must be approved beforehand by your Supervisor/Manager.

Absent or Late

If you are going to be absent or late without prior consent of your Supervisor/Manager, please call your Supervisor/Manager before your shift begins. Failure to contact us will be viewed as a “no call, no show” and may result in disciplinary action. Please call and ask for your Supervisor/Manager. If he or she is not available, please inform someone in charge that you are going to be late or absent and the reason why. If you are unable to reach a person, leave a message in either your Supervisor/Manager’s voice mailbox or in the 3V Precision Machining, Inc. voice mailbox.

If you are absent without notice for two (2) consecutive days and fail to communicate with your Supervisor/Manager, you will be considered to have voluntarily terminated your employment. If you are late two (2) or more times in a one (1) month period, you may be subject to disciplinary action. If you are absent without permission more than one (1) time in a one-week period, you may be subject to disciplinary action, and will be required to provide documentation to support your absences.

Dress Code

We deal with some important people – our clients. The way you dress directly impacts your performance as well as the professionalism of our work environment. Our official policy is safe and non-distracting dress attire. When it comes to dress code, our best advice is to not take chances – if you have to wonder whether or not something is acceptable, chances are it is not. If in doubt, check with your manager.

An employee deemed to be inappropriately dressed will be asked to leave the premise and return when suitably attired. If the violation of the dress code is deemed minor, your Supervisor/Manager may give you a warning and permit you to remain at work.

Health and Safety

Health and Safety are serious matters and should be viewed as such.

3V Precision Machining, Inc. is committed to providing its employees with a safe and enjoyable working environment. A Health and Safety Standard has been established in accordance with the Department of Labor and Industries in order to create and maintain active interest in health and safety, reduce accidents, and stimulate an awareness of health and safety issues company-wide.

The Health and Safety Standard is committed to regular monitoring of safety and health programs, establishing, and promoting health and safety programs for employee education, and ensuring adequate records are maintained on accidents. As of 01/01/2017, employees may be subject to an annual physical with their primary health care provider.

In the event of an accident, you must report the incident to your Supervisor so that appropriate follow-up action can be taken to a) ensure that you are alright, and b) ensure that a similar incident will not occur in the future.

To ensure everyone's safety, please do your part to maintain the following conditions:

Floors

- Clean, orderly, sanitary conditions.
- Free of slip, trip, or fall hazards.
- Free of other obstructions.

Workstations

- All stations should be clean and organized for the duration of the shift as well as at the end of each shift.

Aisles and Passageways

- Clear and organized.

Manufacturing for Personal Use

- No employee shall manufacture an item that might be perceived as a weapon of any kind.
- If an employee wishes to use this facility for manufacturing of personal items, prior approval must be obtained.

Discipline and Performance Reviews

Breach of Policies

An employee guilty of misconduct or breach of the policies outlined in this manual, may be subject to discipline. The intent of our disciplinary process is to ensure adequate understanding of our policies, and to provide an opportunity for the employee concerned to modify his or her behavior before it is necessary to institute punitive measures.

The following disciplinary guidelines have been established to facilitate fair and consistent treatment of workplace issues:

- Supervisors/Managers will administer any discipline in a constructive manner when needed in order to correct an employee's unacceptable behavior or work conduct.
- The first level of discipline will normally be in the form of a verbal warning. A written notation of a verbal warning will be placed in an employee's file. If the behavior or conduct is not desirably altered, written warnings may result. Continued violations may result in suspensions without pay or termination of employment.
- Any warning will outline the nature of the infraction and the implications of said infraction as it pertains to you, as well as a recommended follow-up course of action.
- All incidents of disciplinary action will be properly documented and will be added to an employee's file. The employee will receive a copy of this documentation and may review his or her personal file on request.

In the event of serious or malicious breaches of conduct, the warning process may be bypassed, resulting directly in termination.

3V Precision Machining, Inc. requires all employees to have read this employee manual and to sign the signature page at the end of the manual, which will be placed in the employee's file.

Performance Evaluation

All employees will be evaluated on a regular basis on their performance, productivity, and the quality of their work. In the event of a concern about an employee's performance, a progression of verbal and written warnings will be followed to: a) note that there is a concern, b) agree upon strategies to address the performance concern, and c) define a timeline for expected improvement. This process is intended to provide an opportunity to improve performance, and to supply every employee with the tools and time needed to demonstrate such an improvement and to succeed.

Leaving 3V Precision Machining, Inc

Resignation

If you plan to resign your position, please notify your Supervisor/Manager, both verbally and in written form, at the earliest possible time so that we can process your exit papers. This advance notice lets us make sure that any outstanding pay or commissions are calculated and that your separation papers and final pay are available within thirty (30) days of separation.

Termination

In the event that your employment is terminated for any reason, your record of employment and final pay, including outstanding vacation, will be available within thirty (30) days.

If an employee is terminated for willful misconduct, such as violence, fraud, theft, or vandalism, he or she may be terminated without notice, and without payment in lieu of notice.

Training and Career Management

3V Precision Machining, Inc. is committed to the growth and development of all its employees.

The investment that 3V Precision Machining, Inc. makes in partnership with staff members in their continuing career development allows it to achieve maximum flexibility in meeting its current and future skills requirements.

Therefore, 3V Precision Machining, Inc. is committed to creating and fostering an environment that facilitates and enhances the skills training and career development of its staff. Staff will be provided with opportunities and paid time away from the job so that they may maintain and develop their skills, adapt to changing workplace needs, and fulfill their employment potential within 3V Precision Machining, Inc.

For purposes of this policy, "training and career development" includes formal training, work experiences, job networking, or formal courses of study to update and enhance the skills/knowledge necessary to make a continuing contribution to the work of 3V Precision Machining, Inc., in current and future roles.

Leave Policies

Vacation

Vacation is a key element in helping us achieve balance between our personal life and the demands put on us by the business. It is important for each of us to carefully plan our work schedules every year so that we can take advantage of this employee benefit. The amount of vacation time given to each employee depends on the number of full-time (or equivalent) years of employment with 3V precision Machining, Inc., in specific cases, recognized industry experience.

Number of years' experience	Number of vacation days
Completion of one year	One (1) week per year
Completion of five years	Two (2) weeks per year

After the employee's anniversary, vacation time will renew on Jan 1st of each subsequent calendar year.

You must have your vacation dates approved by your Supervisor/Manager in advance and prior to booking. Your Supervisor/Manager should be advised in writing of your preferences at least thirty (30) days prior to the first day you will be absent, so that vacations can be reconciled with the office's workload and staff assignments. Managers reserve the right to refuse a particular time slot if necessary but will provide reasonable alternatives.

Accumulated Vacation Usage

3V Precision Machining, Inc. believes that all employees need vacation time and that deferring vacations can increase stress and lower productivity and morale.

Salaried employees must use (take off) all regular vacation days earned in a year by December 31st of that year. Where unusual business or personal reasons preclude an individual from taking all earned vacation, management will consider exceptions. For all non-salaried employees that are eligible, all vacation days must be taken within the year. Any days not taken *will* be forfeited.

Public Holidays

The calendar year includes the following holidays:

New Years' Day	Independence Day	Labor Day	Christmas Day
Memorial Day	Veterans Day (Veterans Only)	Thanksgiving Day	

When a statutory holiday falls on a Saturday or Sunday, another weekday will be granted instead.

Necessary Leave

It is preferred that you take care of your personal needs outside of your business hours. However, should you need time off for an appointment, please submit a written request to your Supervisor/Manager at least 48 hours prior to the appointment. For your convenience, an Absence Request Form may be obtained from Human Resources.

There are several recognized special circumstances or occasions that may prevent you from reporting for work. Requests for necessary leaves due to such circumstances or occasions will be considered on a case-by-case basis.

An employee who is entitled to emergency (necessary) leave can take up to 10 days unpaid leave of absence due to:

- personal illness, injury, or medical emergency, and
- death, illness, injury, medical emergency, or other urgent matters relating to:
 - a spouse or registered domestic partner
 - a parent, step-parent, foster parent, child, step-child, foster child, grandparent, step-grandparent, grandchild or step-grandchild of the employee, the employee's spouse or the employee's registered domestic partner
 - the spouse or registered domestic partner of an employee's child
 - a brother or sister of the employee
 - a relative of the employee who is dependent on the employee for care or assistance

Regarding necessary leave, you must inform your Supervisor/Manager before the start of your shift. It is best to speak to the person directly, but, if you cannot, leave a voice message and whenever possible, follow up by phone or e-mail. If you leave the office during working hours for medical reasons, you must inform your Supervisor/Manager prior to your departure. Any absence for medical reasons that lasts more than two (2) days requires a medical certificate issued by a physician.

Sick Leave

All employees are required to bring in a doctor's note the day they return to work if they consume more than one sick day at a time. Failure to bring in a doctor's note will result in the employee's absence being marked as 'Time off Without Pay' and may be marked as an Unauthorized Absence in the employees file.

Regardless of its length and explanation, an unauthorized absence is considered to be a serious infraction. Days of absence for which an employee does not provide satisfactory notice may result in termination.

Sick Leave Accrual

Employees accrue paid Sick Leave for all hours worked. Sick Leave accrues for all employees as follows: **1 hour paid Sick Leave accrues for every 40 hours worked.** If you don't use all your accrued Sick time in one-year, unused paid Sick Leave balances *up to* 40 hours carry over from one accrual year to the next. Employees cannot carry over more than 40 hours of accrued Sick Leave in any calendar year. Employees may use their accrued paid sick leave after their ninety (90) day probationary period.

Sick Leave is renewed *after* the employee's one-year anniversary. After the employee's anniversary, Sick Leave accrual will renew on January 1st of each calendar year.

Pregnancy and Parental Leave

Pregnancy and parental leave of twelve (12) weeks unpaid time off will be granted to care for a newborn or newly adopted child.

Probationary Trial Period Policy

All employees of the Company are employed on a Probationary basis until they have completed their first ninety (90) days in employment. During this time, new employees are not eligible for benefits, such as medical, personal or holiday leave. Medical and Holiday pay eligibility begins on the first of the month following the completion of the employee's first sixty (60) days of employment.

We at 3v highly encourage you to ask questions, make suggestions and voice your concerns with a supervisor and/or trainer. We strive to provide opportunities for continuous growth within our industry to all our employees, especially during the first ninety (90) days of employment.

If you or your supervisor, trainer, or upper management determines that your abilities and/or performance are not suitable for the job requirement, 3v retains the right to terminate you any stage of your probationary employment. Your supervisor and/or your trainer will strive to give you the help and guidance you will need to become familiar with your department, the requirements of your job, and how it will contribute to the overall operation. If, at any time, you feel as if you are not receiving the proper training necessary to complete your job accurately and with efficiency, please speak with your supervisor and/or trainer, or with upper management.

After your ninety (90) days, your performance and abilities will be reviewed by your Supervisor and upper Management. If, at the end of your ninety (90) days, and your performance and/or abilities are found to be lacking, your employment may be terminated.

Probationary Trial Period Attendance Policy

Tardiness on three (3) separate occasions or total absence/tardiness of twenty-four (24) hours within the first ninety (90) days of your employment will constitute as a violation of the attendance policy and may result in termination of employment. Undocumented absence/tardiness on one (1) occasion may result in termination of employment.

Documented absences/tardiness, such as, but not limited to, family and/or medical emergency, means that an Absence Request Form was filed and/or a text message or phone call was placed before, during, or after the absence/tardiness occurred.

Respect Policy

Freedom from Discrimination

3V Precision Machining, Inc. recognizes the dignity and worth of every person, and will provide equal rights and opportunities without discrimination. The company's aim is to create and promote a climate of understanding and mutual respect so that each person feels a part of the corporate community, and will be able to contribute fully to the development and well-being of the company.

Harassment

Harassment is any unwelcome behavior that is verbal, physical, deliberate, and/or unsolicited. It may be one incident, or a series of incidents. While the following is not an exhaustive list, harassment may include:

- Verbal abuse or threats.
- Unwelcome remarks, jokes, innuendos, or taunting about a person's body, attire, age, marital status, ethnic or national origin, religion, etc.
- Displaying of sexually explicit, racist, or other offensive or derogatory pictures.
- Practical jokes which cause awkwardness or embarrassment.
- Unwelcome invitations or requests, whether indirect or explicit, or intimidation.
- Leering or other gestures.
- Condescension or paternalism which undermines self-respect.
- Unnecessary physical contact such as touching, patting, pinching, punching.
- Physical assault.
- Any act of harassment committed by an employee or an agent of any employer in the course of the employment shall be considered to be an act committed by that employer.

- An act of harassment shall not, however, be considered to be an act committed by an employer if it is established that the employer did not consent to the commission of the act and exercised all due diligence to prevent the act from being committed and, subsequently, to mitigate or avoid its consequences.
- Harassment will be considered to have taken place if a reasonable person ought to have known that such behavior was unwelcome.
- In investigating and deciding each case, there must be an objective examination of all the circumstances (including the nature and context of the incidents).

3V Precision Machining, Inc. will make every reasonable effort to ensure that no employee is subjected to harassment, and should an incident occur, disciplinary measures will be taken against any person who knowingly engages in this behavior. This action may include termination.

Confidentiality is also required so that the reputations and interests of those accused of harassment are protected. Therefore, the name of the complainant or the circumstances related to the complaint will not be disclosed to any person unless disclosure is necessary for the purposes of investigating the complaint or taking disciplinary measures in relation to the complaint. Any person breaching confidentiality may be subject to disciplinary sanction or other appropriate action.

Complaint Resolution Procedures

Every employee has the right to make a complaint. An employee can make a complaint either to the Supervisor of his or her department, to Peter Boucher or to another member of management with whom the employee feels comfortable discussing the matter. All complaints brought to a Supervisor, or other member of management, will be taken to a private place for discussion and action within 24 hours.

Any employee who feels that they have been subjected to harassment or discrimination may lodge a complaint with the employer, or another member of management with whom the employee feels comfortable talking to about the situation.

For your convenience, we have created the Employee Complaint/Concern Form for you to use if you do not wish to speak to someone in management or your supervisor. The employer will not disclose the name of the complainant or the conditions of the complaint, unless it becomes necessary in the course of investigation, resolution, or disciplinary action.

Copies of the pertinent sections of the laws enforced by the EEOC (U.S. Equal Employment Opportunity Commission) are available at www.eeoc.gov for any employee who wishes to review the laws.

Documentation

For everyone involved in the process, it is important to make and keep written notes about the events leading to a complaint. These details should include:

- What happened – a description of the events or situation
- When it happened – dates and times of the events
- Where it happened
- Who saw or heard it happen – the names of witnesses, if any

As well, any other documents or materials that may have something to do with the complaint (such as letters, notes, or offensive pictures) should be kept.

Resolution

Upon filing a complaint, 3v Precision Machining, Inc. will work with the complainant to ensure fair and swift resolution to the issue, through an investigation of the alleged offense. An investigation is intended to be used in cases where the alleged harassment may have had a serious impact on the complainant or respondent, where the case is important to the goals of 3V Precision Machining, Inc. or where the respondent has refused to participate in earlier efforts to deal with the complaint.

The complainant may request that measures be taken to correct damage done to her/his career development, physical or emotional health, reputation, or finances. The range of remedies may include, but is not limited to: an apology, compensation for professional losses, or reinstatement. A recommendation for remedy will be sent to the President of 3V Precision Machining, Inc. for decision. The complainant will be given an opportunity to comment on the proposed remedy before a final decision is made.

Protection from Reprisal

Persons who make a complaint, as well as anyone else who is involved, should not be penalized for doing so. This is called "reprisal." Protection from reprisal covers:

- Complainants
- Witnesses
- Representatives of complainants and witnesses
- Investigators
- Decision makers/management

Representation

If desired, the people involved in an internal complaint resolution process are allowed to have someone represent them if they wish. Representatives may include a supervisor or a colleague.

Discipline

3V Precision Machining, Inc. will follow the concept of progressive discipline and will take the following matters into consideration:

- The severity of the offense
- Whether the offense was intentional or unintentional
- Whether the offense was an isolated incident or involved repeated acts
- Mitigating or aggravating circumstances affecting either party
- Sanctions applied in similar cases

The range of disciplinary sanctions may include, but is not limited to: an oral warning, a letter of reprimand, suspension, or dismissal. In addition, the respondent may be required to participate in a harassment awareness program. Both the complainant and respondent will be informed of the final decision.

Use of Office Resources

Telephone Systems and Long-Distance Codes

3V Precision Machining, Inc. provides a telephone and long-distance access for the purposes of selling our products and services and facilitating client communications. As such, please observe the following restrictions as they relate to personal use of the phone system:

If you need to make a personal long-distance call, please get permission from your Supervisor/Manager to do so. It is our expectation that you will only make such calls in an emergency. Making personal long-distance calls without permission, or abusing permission through excessive calling, will be treated as theft and will result in immediate dismissal and required payment of charges owing. Feel free to make a local call when on break or lunch. Please do not call directory assistance for personal reasons as each call results in a charge to the company.

Acceptable Technology Use Policy

3V Precision Machining, Inc. provides many business tools to its employees and contractors to enhance their productivity and jobs. These tools include computers and their software, internal networks (e-mail, intranet), external networks like the Internet, telephone systems, voice mail, fax, copiers, and so on. We require that these systems be used in a responsible way, ethically, and in compliance with all legislation and other 3V Precision Machining, Inc. policies and contracts. Non-compliance could have a severe, negative impact on the Company, its employees, and clients.

Appropriate Use

Individuals at 3V Precision Machining, Inc. are encouraged to use the corporate systems to further the business goals and objectives of the organization. The types of activities that are encouraged include:

- Communicating with fellow employees, 3V Precision Machining, Inc. business partners, and 3V Precision Machining, Inc. clients within the context of an individual's assigned responsibilities.
- Acquiring or sharing information necessary or related to the performance of an individual's assigned responsibilities.

Inappropriate Use

Individual use will not interfere with others' use and enjoyment of the systems. Use in a manner that is not consistent with the mission of 3V Precision Machining, Inc., misrepresents 3V Precision Machining, Inc., or violates any 3V Precision Machining, Inc. policy is prohibited. This includes, but is not limited to, the following:

- The contents of messages, downloads, and so on must not be offensive, insulting, or harassing for other employees, users, or non-employees, or contain comments that could reasonably be interpreted as discriminatory.
- The systems may not be used for illegal or unlawful purposes, including copyright infringement, obscenity, libel, slander, fraud, defamation, plagiarism, intimidation, forgery, impersonation, illegal gambling, soliciting for illegal pyramid schemes, and computer tampering (e.g. spreading computer viruses).
- Users should not pay access fees or commit 3V Precision Machining, Inc. financial resources without formal authorization.
- 3V Precision Machining, Inc. allows limited personal use for communication with family and friends, independent learning, and public service. Systems access at 3V Precision Machining, Inc. is controlled through individual accounts and passwords. Department managers are responsible for defining appropriate access levels/usage for the persons in their department and conveying that information to the network administrator.
- 3V Precision Machining, Inc. prohibits use for mass unsolicited mailings, access for non-employees to 3V Precision Machining, Inc. resources or network facilities, competitive commercial activity unless pre-approved by 3V Precision Machining, Inc., and the dissemination of chain letters.
- Individuals may not view, copy, alter, or destroy data, software, documentation, or data communications belonging to 3V Precision Machining, Inc., or another individual without authorized permission.
- Users will not violate the policies of any network accessed through their account.
- In the interest of maintaining network performance, users should not send
- electronic mail attachments and should avoid downloading any non-work related of files.

Password Policy

Passwords are an important aspect of computer security. They are the front lines of protection for user accounts. It is critical that an appropriate password is chosen so as not to compromise 3V Precision Machining, Inc.'s entire network. As such, all 3V Precision Machining, Inc. employees (including contractors and vendors with access to 3V Precision Machining, Inc. systems) are responsible for taking the following steps to ensure a proper password is chosen and kept secure:

- All system-level passwords (e.g. root, enable, NT admin, application administrative accounts, etc.) must be changed on a quarterly basis.
- All productive system-level passwords must be part of 3V Precision Machining, Inc. administered global password management database.
- All user-level passwords (e.g. e-mail, Web, desktop computer, etc.) must be changed every three months.
- User accounts that have system-level privileges granted through group membership or programs must have a unique password from all other accounts held by that user.
- Where Simple Network Management Protocol (SNMP) is used, the community strings must be defined as something other than the standard defaults of "public," "private," and system, and must be different from the passwords used to log in interactively. A keyed hash must be used where available (e.g. SNMPv2).
- Passwords must not be inserted into e-mail messages or other forms of electronic communications.

Password Construction Guidelines

Passwords have various uses and purposes at 3V Precision Machining, Inc., some of which are common, others that are complex. Since very few systems have support for one-time tokens (dynamic passwords intended for a single use), all employees should be aware of how to select strong passwords.

Poor/weak passwords have the following characteristics:

- The password contains less than 8 characters.
- The password is a word found in the dictionary (English or Foreign).
- The password is a commonly used word or phrase such as a pet's name, a birthday, a phone number, or a letter or number pattern.

Strong passwords have the following characteristics:

- Contain both upper- and lower-case characters.
- Have digits and punctuation characters as well as letters.
- Are at least 8 **alphanumeric** characters long.
- Are not based on personal information (e.g. names of family members).
- Do not use the same password for 3V Precision Machining, Inc. accounts as for any other non-3V Precision Machining, Inc. access, and where possible, do not use the same password for various 3V Precision Machining, Inc. access needs.

It is critical that you do not share your password with anyone. All passwords are to be treated as sensitive, confidential 3V Precision Machining, Inc. information. If someone demands a password, refer them to this document and have them contact the IT Department for assistance.

If an account or password is suspected to have been compromised, report the incident to the IT Department and change all passwords.

Password cracking or guessing may be performed on a periodic or random basis by the IT Department or its delegates. If a password is guessed or cracked during one of these scans, the user will be required to change it.

Use of Passwords and Passphrases from Remote Access Users

Access to the 3V Precision Machining, Inc. networks via remote access (VPN) is to be controlled using a one-time password authentication or public/private key system with a strong passphrase.

A passphrase is a longer version of a password and is therefore, more secure. A passphrase typically is composed of multiple words. A good passphrase is relatively long and contains a combination of upper and lowercase letters, numeric and punctuation characters.

The rules above that apply to passwords also apply to passphrases.

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination.

Ownership and Privacy Issues

All systems, including manufacturing and computer systems are 3V Precision Machining, Inc.'s property as well as, for access and security purposes, the information they contain. We respect our employee's right to privacy. However, we grant access to our systems for business use. Employees must not expect that information contained in these 3V systems is private. 3V Precision Machining, Inc. reserves the right, from time to time, for commercial, legal or otherwise valid reasons, to read, monitor, control and access user files and messages created, saved, transmitted, or received. In the event of intercepted illegal activity, we will bring them to the attention of the appropriate authority without prior notification to the sender or receiver.

Failure to Comply

Violations of this policy will be treated like other allegations of wrongdoing at 3V Precision Machining, Inc. Sanctions for inappropriate use of our systems may include, but are not limited to, one or more of the following:

- Temporary or permanent revocation of access to some or all computing and networking resources and facilities.
- Disciplinary action.
- Legal action according to applicable laws and contractual agreements.

Purchasing Policy

In order to track all purchases and adhere to budgetary guidelines, all purchasing for 3V Precision Machining, Inc. will be centralized through the Administration and Shipping/Receiving Departments.

A list of items to be purchased will be forwarded by all Managers to the President, Peter Boucher. Only requests received from Managers will be accepted. Therefore, all employees must submit their purchase requests to their Managers.

It is recognized that there will be times when supplies are needed prior to the order date. In this case, please notify the Manager or President of your purchase, and for orders over One Hundred Dollars (\$100.00), a Purchase Order Number must be obtained from the Purchasing Department. To request a Purchase Order Number, Managers must call or e-mail the Purchasing Department and provide information surrounding the purchase (i.e. what it is and where you are purchasing the product).

Expense Policy

It is the intent of the 3V Precision Machining, Inc. Expense Policy to reimburse employees for necessary, reasonable, and actual business expenses. Employees are to follow all policies. Any exceptions must be clearly documented and detailed.

Expenses will be allowed for the following items:

Department Managed Expenses

Departmental expenses must be pre-approved at the beginning of the year in a formal budget process. This includes all meals, entertainment, driving, and any other form of expense.

Generally, meals and expenses incurred while entertaining clients, prospective clients, consultants, and those involved in the support to the sales process may be expensed within the pre-approved budgets. Names must be added to the meal receipt for tracking purposes.

Expense items, such as parking and other incidentals, will be covered by 3V Precision Machining, Inc. if they are related to business travel or event.

3V Precision Machining, Inc. will not pay for regular, daily/monthly (etc.) parking as a result of driving to the corporate office or incurred as a result of leaving your “home” lot, unless they are incurred as a result of leaving the lot due to business activity.

3V Precision Machining Inc. will pay for parking at the client/event location and mileage charges to the client/event location if the client/event is located outside the core area of the municipality in which the employee normally works.

Business Travel

Those employees required to travel for business purposes will be reimbursed. 3V Precision Machining, Inc. reserves the right to create a monthly travel rate plan.

Cell Phones

As a rule, cell phone usage will not be paid for; however, when cell phone usage facilitates your job performance (i.e. traveling sales) and usage has been approved, you will be reimbursed for that usage.

Approval

Expense approval must be obtained through the respective department head. Each department will have an established expense and training budget with which to work. Reimbursement is normally dependent upon employee provision of receipts for expenses claimed.

Any expenses that are not pre-approved may not be accepted by 3V Precision Machining, Inc.

Payroll

All employees are paid **once a month** by check or direct deposit into the bank of their choice. You will be asked to provide a blank voided check to get you set up on our payroll system.

Due to the impact of some holidays on our payroll services, it may be necessary for the payroll office to forecast daily wages or commissions to meet payroll entry deadlines. In the event that this occurs, you will be notified of any impact this may have on your payroll, and any corrections will be processed in the following check.

ALL CHANGES OF PERSONAL INFORMATION, SUCH AS, BUT NOT LIMITED TO, CHANGE OF ADDRESS, PHONE, NAME, MARITAL STATUS, ETC, MUST BE GIVEN, IN WRITING AND WITH PROPER DOCUMENTATION OF CHANGE, TO ADMINISTRATION IMMEDIATELY.

Confidentiality and Non-Competition

Confidential Information

As an employee or contractor of 3V Precision Machining, Inc., you may have access to confidential information (ours, our clients, and our partners) that is commercially valuable. Any unauthorized use or disclosure of this information would cause serious and irreparable injury to 3V Precision Machining, Inc.

Confidential information includes, but is not limited to:

- Operation, marketing, product, product development, and other plans.
- Compensation practices.
- Pricing and sales policies, techniques, and concepts.
- The client list and all information related to our clients.
- Information on prospective clients being solicited by the employer.
- Information regarding the employees and suppliers of the employer.
- The financial affairs of the employer.
- Training and other manuals.
- Proprietary business opportunities or ventures being considered or pursued by the employer.
- Any other information in any form (including all memoranda, notes, records, reports, manuals, and any other documents, both hard copy and electronic data), which is not generally known to any competitor of the employer.

You agree that you will not directly or indirectly use, divulge, disclose, or communicate to any person, firm, or corporation any confidential information, unless it is with the written permission of an officer of 3V Precision Machining, Inc.

Non-Competition

As an employee or contractor of 3V Precision Machining, Inc., you will have dealings with clients and prospective clients for our company. Any competition for solicitation of such clients during or after termination of employment would cause serious and irreparable injury to our company. To protect the legitimate interests of 3V Precision Machining, Inc., you are subject to certain restrictions after the termination of employment/contract.

You agree that for a period of 2 year(s) from the date of termination of employment, you will not:

- Intentionally act in any manner that is detrimental to the relations of 3V Precision Machining, Inc. with its clients, employees, and/or contractors.
- Enter into, directly or indirectly, or on behalf of any other person, firm, or corporation, any contractual relations with the prohibited clients for the purpose of providing services similar to the services provided by our company.
- Enter into any contractual relations with direct competitors who provide services similar to the services provided by our company for a period of six months.
- Manipulate, use, or alter for resale or reuse, any product or part thereof (which is bound by copyright law) of 3V Precision Machining, Inc. in any manner that is detrimental to 3V Precision Machining, Inc.

In the event of a breach (or threat of a breach) of this agreement, 3V Precision Machining, Inc. is entitled to immediate and appropriate injunctive relief, or a decree of specific performance of this Agreement, without the necessity of showing any irreparable injury or special damages. During your period of employment, any breach of confidentiality may subject you to termination. Such breach may include all the foregoing items and, in addition, any personnel or management issues covered by this document that are “aired” in a non-professional forum beyond the four walls of the 3V facility.



Precision Machining, Inc.

3V Precision Machining, Inc.

Employee Declaration: Employee Handbook

I have read and understand the entire 3V Precision Machining Inc. [Employee Handbook](#), and any question I may have had have been answered to my satisfaction. I agree to abide by all company policies stated therein.

Employee Name (print)

Employee Signature

Date

NOTE: The information provided in this document is intended for informational purposes and is subject to change at any time without prior notice at 3v Precision Machining, Inc.'s sole discretion.

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Precision Machining, Inc.

Code of Conduct

August 2020



Precision Machining, Inc.

3V Precision Machining, Inc.

Code of Conduct

Peter R. Boucher

3V Precision Machining, Inc. aims to continuously improve the machining service capabilities in High Temperature Metals using Multi-Axis CNC Machines and CAD/CAM programming.

Our Company strives to stay up to date with technology to advance our service capabilities in any of our customers industries.

Corporate Values

Quality Manufacturing

3VPM offers only High-Quality Complex CNC Machining for Industries, including but not limited to, Aviation, Space and Military Defense.

Communicating

3VPM Strives to convey meanings from one entity or group to another through the use of mutually understood signs, symbols, and semiotic rules.

Validating

3VPM continuously improves our quality management of manufactured products systemically to validate and provide evidence that is based on truth, fact, or is acceptable.



Precision Machining, Inc.

CEO Message

Our Code of Conduct serves as a compass, guiding us to a common destination. Our 3V Precision Machining, Inc. values of Quality Manufacturing, Communicating, and Validating establish high standards of expected ethical behavior that serve as an essential part of 3V Precision Machining, Inc.'s foundation. By embodying these values into our organization, we are helping ensure our future success.

It is important to know that this Code applies to every 3V Precision Machining, Inc. employee, no matter what part of the business, level or area. Its scope also extends beyond employees and embraces our interactions and obligations to others, such as our customers, shareholders, and partners. When we live these values and hold each other accountable to them, we strengthen our corporate culture and solidify our reputation.

The importance of individual accountability to our Code standards is paramount. While it may sometimes be easier to look the other way and ignore something that appears inconsistent with our Code, this is never acceptable. It is expected that employees will always do the right thing and have the moral courage to speak up and raise concerns. This is especially true in times of increased performance pressures. We must not let the challenges we face lead us to neglect our compliance and values commitments.

I invite you to join me in living our values of Quality Manufacturing, Communicating, and Validating and adhering to 3V Precision Machining, Inc.'s Code of Conduct. Together we can foster an ethical workplace culture and continue our history as a strong and trustworthy Company to our employees, shareholders and customers.

Peter R. Boucher

Chief Executive Officer and President

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Responsibilities: Doing the Right Thing

Our values of Quality Manufacturing, Communicating, and Validating are the foundation for the way we do business and our success depends upon our unwavering commitment to conducting business ethically and in compliance with the laws and regulations where we operate. As part of this commitment, we are expected to comply with this Code of Conduct (“Code”).

Scope and Application

This Code, and the standards of business conduct and ethics incorporated in the Code, apply to all employees, officers and directors of 3V Precision Machining, Inc. Certain business partners and third parties, such as suppliers, agents, representatives, contractors, subcontractors, and consultants serve as an extension of 3V Precision Machining, Inc. and as such, are expected to conduct themselves according to our values and standard of ethics when working on behalf of 3V Precision Machining, Inc..

Any waivers to this code may only be granted by the Board of Directors and will be publicly disclosed as required by law or regulation.

Employee Responsibilities

Each of us must take personal responsibility for acting according to our 3V Precision Machining, Inc. values and this Code, even when this means making difficult choices. We must be committed to living our values and using our Code as a guide for interactions with our stakeholders, including fellow employees, customers, business partners, shareholders, suppliers, third parties, government agencies, and communities. Accordingly, we have the responsibility to:

- Live our 3V Precision Machining, Inc. values and abide by the Code, 3V Precision Machining, Inc. policies, and the laws and regulations that pertain to an individual’s job responsibilities.
- Report concerns about possible violations of the Code, 3V Precision Machining, Inc. policy, or laws and regulations.
- Complete all required employee training in a timely manner and keep up to date on current standards and expectations.

It is important to note that violations of the Code, 3V Precision Machining, Inc. policies, or laws and regulations may result in disciplinary action up to and including termination, or legal proceedings and penalties including, in some circumstances, civil or criminal prosecution for both the individual involved and 3V Precision Machining, Inc.

Supervisor and Manager Responsibilities

Leaders, supervisors and managers have the following additional responsibilities:

- Lead by example and model the highest standards of ethical business conduct and our 3V Precision Machining, Inc. values.
- Take the time to ensure your employees know how to use the Code and how to seek additional help.
- Help create a work environment that focuses on building relationships, recognizes effort, and values mutual respect and open communication.
- Be proactive. Look for opportunities to discuss and address ethics and challenging situations with others.
- Create an environment where everyone feels comfortable asking questions and reporting known or potential violations of the Code, policies, or the law.
- Strictly avoid acts of retaliation or behavior that may be perceived by others as retaliation, against those who report concerns.
- Respond in a timely and effective manner to concerns which are brought to your attention, but do not feel you must give an immediate response. Reflect, seek advice and respond later, if needed.
- Never ask or pressure anyone to do something that you would be prohibited from doing yourself.
- Hold employees accountable for completing all training requirements.

Compliance with Laws and Regulations

As a 3V Precision Machining, Inc. employee, regardless of nationality or country location, you are responsible for being aware of relevant laws and regulations that apply to your work. You must be vigilant in compliance and alert to changes in the law or new requirements that may affect your responsibilities.

Working globally can raise additional ethics and compliance issues because local business and cultural practices may vary. While we respect the norms of our customers and colleagues throughout the world, we must comply with applicable laws and regulations. If you have questions, or if a conflict appears to exist between requirements, stop what you are doing and seek guidance from your supervisor or others listed in this Code.

Making Ethical Decisions

We all take pride in our work and in the choices we make on behalf of 3V Precision Machining, Inc. These choices may be more difficult to make when we encounter ethical challenges.

When faced with a difficult ethical decision, ask yourself the following questions to determine whether the action you are considering is appropriate:

- Am I adhering to the letter and spirit of our 3V Precision Machining, Inc.'s policies, and all applicable laws and regulations?
- Is my action consistent with 3V Precision Machining, Inc. values and the principles set forth in our Code?
- Would I be acting in the best interests of 3V Precision Machining, Inc., my co-workers, and our customers?
- What would my family, friends, or neighbors think of my action?
- Would I want my action reported on the front page of a newspaper or on the internet?

If you are unsure as to what action is appropriate, seek guidance by speaking with your supervisor or any of the other resources listed in this Code.

Asking Questions and Raising Concerns

OUR STANDARD: If you observe or suspect any illegal or unethical behavior, you are expected to raise the issue to your management or one of the other resources listed below.

Any employee who has a concern or complaint regarding accounting, internal accounting controls or auditing matters may also report the matter to 3V Precision Machining, Inc.'s General Auditor or 3V Precision Machining, Inc.'s Audit Committee on a confidential or anonymous basis by mail c/o 3V Precision Machining, Inc.'s Corporate Secretary, 10731 A St S Ste C, Tacoma, WA. 98444

Expectations when Using the Helpline

OUR STANDARD: The Helpline and web site are always available, and all reports will be investigated thoroughly and confidentially.

The Helpline is available 24 hours, seven days a week. This in-house provider facilitates the documentation of your concerns and forwards them to the appropriate compliance contact within 3V Precision Machining, Inc. to address.

When making a report, you are encouraged to identify yourself. Doing so facilitates communication and helps 3V Precision Machining, Inc. resolve the situation. However, in the United States and elsewhere as allowed by local law, you may make a report anonymously.

If you choose to report anonymously, it is important that you check back with Helpline as we may have posted additional questions to help us with our investigation or we may have provided feedback to you on your concern. All communications are facilitated by the third-party provider. Access to reported issues is restricted, secure and confidential in a manner consistent with conducting a thorough investigation and meeting any legal requirements. All issues are thoroughly investigated and, if appropriate, corrective actions are implemented.

Non-Retaliation

OUR STANDARD: There is no tolerance of retaliation for those employees who, in good faith, report possible ethics or compliance violations.

You can report suspected ethical violations in confidence and without fear of retaliation. 3V Precision Machining, Inc. will not tolerate any retaliation against an employee who, in good faith, asks questions, reports possible violations of the Code, policy, or law, or participates in an investigation.

Reporting “in good faith” means making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken. Retaliation is a violation of our Code and knowledge, or suspicion of retaliation should be immediately reported.

Cooperating with Inquiries and Investigations

OUR STANDARD: Cooperate with all internal and external inquiries and investigations.

You are expected to fully cooperate with internal and external audits, investigations, and inquiries that are conducted by 3V Precision Machining, Inc. In addition, withholding information or knowingly giving false or misleading information is a serious violation of our duties as employees.

In the course of business you may receive inquiries or requests for information from government officials. Although we are expected to fully cooperate, if you learn of a potential government investigation or inquiry, immediately notify your supervisor and the Legal Department, if possible, prior to taking or promising any action.

With respect to all audits, investigations, and inquiries, you must NOT

- Destroy, alter, or conceal any document in anticipation of or in response to a request for these documents.
- Provide or attempt to influence others to provide incomplete, false, or misleading statements to a 3V Precision Machining, Inc. or government investigator.
- Conduct an investigation yourself; appropriate resources will be assigned to conduct the investigation.

Responsibilities: To One Another

We are committed to providing a professional, respectful, and safe work environment. We owe it to each other to be honest and respectful. We should treat others as we would want to be treated.

Diversity and Non-Discrimination

OUR STANDARD: Maintain an inclusive and diverse work environment free from discrimination and harassment.

We bring together employees with a wide variety of backgrounds, skills and cultures. We value different ideas, opinions, and experiences and are committed to sustaining a culture of inclusion and diversity. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive outstanding results.

We do not tolerate discrimination of any kind. We provide equal employment opportunities for all regardless of race, color, religion, gender, national origin, age, sexual orientation, physical or mental disability, military/veteran status, marital status, gender identity, ethnic background, or any other legally protected classification.

We do not tolerate harassment of any kind. Verbal or physical conduct that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment will not be tolerated. Harassing conduct can include inappropriate gestures, remarks, or touching, or displaying sexually explicit or offensive pictures. Promises of promotion or special treatment in return for sexual favors also constitute harassment.

Make sure you:

- Treat others respectfully, professionally, and promote diversity in the workplace.
- Avoid making comments or jokes and sending or posting materials others might consider offensive.
- Avoid discrimination against others based on any characteristic protected by law.
- Review your own decisions to ensure that you are using objective and quantifiable standards and business considerations to drive your actions.
- Report all incidents of discrimination, harassment and intimidation which you observe.

Safe and Healthy Workplace

OUR STANDARD: Maintain a safe, healthy, and secure work environment.

3V Precision Machining, Inc. is committed to providing a safe, healthy, and secure workplace for colleagues and visitors to our facilities and to operating in an environmentally sound manner.

3V Precision Machining, Inc. requires that all employees practice safe work habits and follow all applicable safety, security and health rules and practices.

Make sure you:

- Review and follow the safety, security, and health rules and practices that apply to your job and your facility.
- Complete required training: follow the additional security procedures required for secure areas.
- Immediately report any practices or situation, regardless of severity, that could pose a threat to the environment, or the safety or health of anyone.

Drugs and Alcohol

To maintain a safe workplace, it is essential that we are able to think clearly and react quickly. Any involvement with illegal drugs including their use, possession, distribution, purchase, sale, offer for sale, or manufacture, while on 3V Precision Machining, Inc. premises, on 3V Precision Machining, Inc. time, or when conducting or travelling on 3V Precision Machining, Inc. business is prohibited. The abusive use of controlled substances including prescription drugs or alcohol is also prohibited. The only exception to this rule is when alcohol is consumed responsibly and in observation of applicable laws at business dinners or in accordance with local management direction at an authorized 3V Precision Machining, Inc. event.

Workplace Violence

Violence of any kind has no place at 3V Precision Machining, Inc. We will not tolerate any acts or threats of physical violence against co-workers, visitors, or anyone on 3V Precision Machining, Inc. property, or by any representatives of 3V Precision Machining, Inc. during 3V Precision Machining, Inc. travel or 3V Precision Machining, Inc.-sponsored events.

Prohibited activities include:

- Threatening remarks or behavior, obscene phone calls, or stalking.
- Assaults or causing physical injury to another.
- Intimidation or acting aggressively in a manner that causes someone else to fear injury.
- Intentionally damaging someone else's property.
- Bringing prohibited items, such as explosives (fireworks, firearms, or ammunition), knives or other weapons into 3V Precision Machining, Inc. facilities or to 3V Precision Machining, Inc. sponsored events.

Every threat of violence is serious, and you are expected to immediately report any observations of violence to your supervisor, any member of management, Human Resources or Security.

Environmental Stewardship

OUR STANDARD: *Protect the environment and conserve natural resources.*

We conduct our business in a way that protects the environment for future generations. We work with our business partners and suppliers to strengthen environmental stewardship and responsibility while respecting the communities where we do business.

We are committed to meeting or exceeding applicable environmental laws and regulations, 3V Precision Machining, Inc. policies, and to continuously improve our environmental performance through resource conservation, waste minimization, water and energy efficiency, and the effective use of raw materials.

Make sure you:

- Comply with all applicable environmental laws, regulations, and 3V Precision Machining, Inc. policies.
- Report any incident or conditions that might result in an environmental violation, pose a hazard, or waste natural resources.
- Do your part to reduce water and energy use.
- Identify opportunities for improving our conservation and recycling efforts.

Human Rights

OUR STANDARD: *Recognize and adhere to internationally-recognized human rights provisions.*

We support human rights by complying with internationally-recognized provisions in all locations where we operate, regardless of local business customs, and are committed to providing safe and secure conditions for those working on our 3V Precision Machining, Inc.'s behalf.

We will not knowingly work with business partners who employ children or forced labor, including prison or bonded labor. We will not tolerate physical punishment or abuse. We will not engage in human trafficking-related activities to include misleading or fraudulent recruiting practices, charging our employees recruiting fees, confiscating or destroying employee identification documents, or supporting prostitution. It is a violation of 3V Precision Machining, Inc. policy for employees to, directly or indirectly, purchase commercial sex acts for themselves, for the benefit of employees or third parties, or while conducting 3V Precision Machining, Inc. business.

Make sure you:

- Immediately report any suspected potential human rights related violations.
- Strictly prohibit use of child or forced labor, including prison or bonded labor.

- Commit to obeying the associated laws and regulations and where these laws vary or conflict, follow the highest standards.

Privacy of Employee Information

OUR STANDARD: Handle employee information responsibly.

For those of us who have access to personal information related to our colleagues and others, we have an obligation to protect this information and exercise caution prior to disclosing it to others.

This includes, but is not limited to, medical, payroll, and personally identifiable information. We may only provide employee information to other employees and third parties where permitted by law, 3V Precision Machining, Inc. approval, or employee permission.

Make sure you:

- Learn which types of information are given heightened protection by the law and 3V Precision Machining, Inc. policy (such as government issued identification, bank account numbers, and medical records) and protect them through appropriate means (such as encryption or other types of limited access).
- Protect the confidentiality of personal information of current and former colleagues, as well as job applicants, business partners, and customers.
- Do not access, discuss or share confidential information unless there is a legitimate business reason to do so.
- Immediately report any loss or inadvertent disclosure of confidential employee information.
- Ensure recipients of employee information will safeguard the information.

Responsibilities: Corporate Citizens

Anti-Trust and Fair Competition

OUR STANDARD: Recognize and avoid anti-competitive behaviors and activities.

We believe in fair and open markets and never engage in improper practices that may limit competition. We compete vigorously to be an industry leader and we do so by maintaining high standards of fairness and honesty when engaged in marketing, promotional, and advertising activities. We look to gain competitive advantage through superior performance, price, and quality and not through unethical or illegal business practices.

We do not enter into agreements with competitors to engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers, or markets.

Anti-trust laws are complex and compliance requirements can vary depending on the circumstance, but in general, the following activities are “red flags” and should be avoided and reported to your supervisor or to 3V Precision Machining, Inc.’s Legal Department:

COLLUSION — when two or more parties secretly communicate or agree on how they will compete. This may include agreements or exchanges of information on pricing, terms, wages, or allocations of markets.

BID-RIGGING — when two or more parties manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding, or knowingly submitting noncompetitive bids.

TYING — when a 3V Precision Machining, Inc. with market power forces customers to take products or services that they do not want or need.

PREDATORY PRICING — when a 3V Precision Machining, Inc. with market power sells a product or service below cost so as to eliminate or harm a competitor, intending to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.

Make sure you:

- Never share 3V Precision Machining, Inc.’s sensitive information with a competitor of 3V Precision Machining, Inc.
- Never share sensitive information of business partners or other third parties with others without their permission.
- Never take advantage of anyone through manipulation, abuse of privileged information, misrepresentation of facts, or any other intentionally unethical or illegal action.
- Never engage in conversations with potential competitors about competitive sensitive information.
- Never use or disseminate non-public information about potential competitors from new hires or candidates for employment.
- Never have conversations with potential competitors that could be perceived as limiting competition.

Anti-Corruption

OUR STANDARD: Do not offer or provide bribes to influence action or accept kickbacks in connection with 3V Precision Machining, Inc. business.

BRIBE – is the payment of anything of value such as cash, gifts, services, contributions, internships or vacations – made for the purpose of improperly obtaining or retaining business.

KICKBACK – is the return of a sum already paid or due to be paid as a part of a legal contract, as a reward or making or fostering business arrangements.

FACILITATION PAYMENTS – also known as “grease payments”, are modest amounts of money paid as an unofficial fee to low level government employees to speed or initiate the performance of routine and expected government services to which 3V Precision Machining, Inc. is entitled.

3V Precision Machining, Inc. is committed to conducting business ethically, with integrity, and in compliance with applicable laws and regulations prohibiting bribery, kickbacks and other forms of corruption in our operations worldwide. Because of the complexity of anti-corruption and bribery laws, it is important that employees are aware of 3V Precision Machining, Inc. policies and ask questions if they have any doubts about the proper course of action. Bribery and kickbacks are never permitted at 3V Precision Machining, Inc., regardless of whether we are dealing with a government or commercial customer.

The U.S. Foreign Corrupt Practices Act (FCPA), the United Kingdom (U.K.) Bribery Act, and the laws of most countries in which we operate all prohibit bribing government officials. For purposes of these laws, the term “government official” is defined broadly and includes civil servants, officials of state-owned or controlled commercial enterprises, representatives of public international organizations, office seekers, political parties, family members, and political party officials. Many countries also have laws that prohibit bribes paid to private individuals.

It is especially important that employees carefully monitor third parties acting on 3V Precision Machining, Inc.’s behalf. We must always be sure to perform due diligence and know our business partners and all those through whom we conduct our business. Our third parties must understand that they are required to operate in strict compliance with our standards and to maintain accurate and complete books and records.

Facilitation payments are not allowed and are a violation of some international norms and national laws, such as the U.K. Bribery Act. You must obtain approval from the Legal Department before making a facilitating payment no matter how small the amount. If you are solicited for a facilitation or expediting payment, contact the Legal Department immediately.

Examples of facilitating payments are offering small fees to low level foreign government officials to expedite processing of a permit, license, or other official document, processing visas or work orders, or providing phone, water, and power service.

Make sure you:

- Never directly or indirectly offer, provide, or authorize money or any item of value to improperly obtain or retain business or to improperly influence a governmental action.
- Never make payments that are intended to improperly influence a government official.
- Never directly or indirectly request, agree to receive or accept kickbacks, payoffs or other personal payments in connection with 3V Precision Machining, Inc. business.
- Notify the Legal Department of third parties or agents who are thought to be valuable primarily for their personal ties rather than for the services they are to perform or who request compensation out of proportion to their services.

Anti-Money Laundering

3V Precision Machining, Inc. does not condone, facilitate, or support money laundering. Involvement in such activities undermines our integrity, damages our reputation, and can expose 3V Precision Machining, Inc. and individuals to severe sanctions.

MONEY LAUNDERING – occurs when companies or individuals attempt to convert, disguise or hide proceeds of illegal activity by moving illegally obtained funds, or hiding the source so the funds are made to appear legitimate.

Employees must comply with all applicable money-laundering and anti-terrorism requirements which prohibit:

- Engaging in financial transactions involving property, funds, or monetary instruments which, directly or indirectly, promote or result from criminal activity.
- Receiving, transferring, transporting, retaining, using, structuring, diverting, or hiding the proceeds of any criminal activity, or aiding or abetting another in any such action.
- Engaging or becoming involved in financing, supporting, or otherwise sponsoring, facilitating, or assisting any terrorist person, activity, or organization.

Make sure you:

- Never cooperate with efforts to evade reporting requirements.
- Report suspicious activity such as payments to offshore banking locations, payments to third parties outside the territory in which the third party operates, and false invoices for sales.

Business Courtesies

OUR STANDARD: Do not accept or provide business courtesies if the intent is to improperly influence a business decision.

BUSINESS COURTESY – is any item of value provided to or received from a third party for the purpose of initiating or furthering a business relationship. Business courtesies include such things as cash, entertainment, meals, gifts, social events, sporting events, travel, lodging, favors, gratuities, discounts and services.

Conducting business with integrity means never seeking to improperly influence business decisions. For this reason, it is important for each of us to exercise common sense and good judgment when giving or receiving business courtesies.

In general, we may not offer or accept a business courtesy if it:

- Violates any law, regulation or policy applicable to the giver or recipient
- May be considered a bribe, payoff or kickback
- Violates customary business practices
- Gives the appearance of impropriety or could give rise to a conflict of interest

We must always avoid situations where business courtesies could harm the reputation of our 3V Precision Machining, Inc. or those of us involved. Please note that we may never attempt to circumvent these rules by using our personal funds or by engaging an agent or representative to pay for any business courtesy that we cannot pay ourselves. The rules outlined in this section also govern the actions of our family members and close friends, as well as those of 3V Precision Machining, Inc.' agents and representatives.

Government Officials

U. S. Government Officials

The U. S. government has strict laws and rules prohibiting its employees or elected representatives from accepting business courtesies. With the exception of common hospitality and promotional items of nominal intrinsic value, we may not offer or give a business courtesy to a government official without the prior written approval of the Legal Department.

Non-U.S. Government Officials

Most countries prohibit their official employees from accepting business courtesies. With limited exceptions, business courtesies extended to any government officials require prior written approval from the Legal Department.

Make sure you:

- Coordinate with the Legal Department for review and approval prior to providing any business courtesy to any government official no matter the country they represent.
- Are aware of the perceptions that can be drawn from the provision of business courtesies to government employees.
- Exercise caution when dealing with business partners, which could appear to be privately owned but are actually considered government entities.

Commercial Third Parties

Exchanging business courtesies with our commercial third parties must be reasonable, infrequent, for a legitimate business reason, and consistent with normal industry practice and local laws. Providing or offering business courtesies to commercial third parties that exceed nominal value may require written Legal Department approval. Exceptions include coffee, soft drinks, light snacks, an inexpensive business-related meal incident to a site visit, recognition awards for program or service achievements, or promotional items. Other than these exceptions, accepting business courtesies from third parties, including suppliers, requires approval by the Legal Department.

Make sure you:

- Seek guidance and approval if you're unsure as to whether the business courtesy is appropriate.
- Only provide and accept business courtesies that are justified by the business relationships. Note, exchanging business courtesies that foster goodwill in business relationships is generally acceptable, but you should never provide or accept courtesies that obligate or appear to obligate the recipient.

- Do not offer or accept lavish, extravagant, or unreasonable business courtesies.
- Do not offer travel and lodging without advance approval from your Legal Department.
- Understand and comply with both 3V Precision Machining, Inc. and third-party policies before offering or providing business courtesies.
- Raise a concern whenever you suspect that a colleague, third party, or other agent of 3V Precision Machining, Inc. may be engaged in an attempt to improperly influence a decision of a customer.
- Specifically, regarding the acceptance of business courtesies,
- Do not request or solicit personal gifts, favors, entertainment, services or any other type of business courtesy.
- Never accept cash or cash equivalents, such as gift cards, of any value.
- Never accept business courtesies of any kind from a business partner with whom you are involved in contract solicitation or negotiations.
- Refuse business courtesies that seem inconsistent with our business practices and report it to your supervisor.
- Seek advance written approval for any exceptions.

Export & Import Compliance

OUR STANDARD: Fully comply with export/import laws and do not trade with sanctioned or embargoed countries or entities.

EXPORT – occurs when a product, service, or technology is transferred either physically across borders, electronically via fax, email, or data-sharing sites, or visually through demonstrations, presentations, and discussions between nationals of different countries. Such exports, if they involve controlled military or dual-use technologies, often require government approval in the form of an export license or other authorization.

IMPORT – occurs when products purchased or obtained from a foreign country or external source are brought into another country. Import transactions are subject to laws and regulations and must go through Customs' formalities or the assessment of necessary duties and taxes.

In the U.S. as well as other countries in which 3V Precision Machining, Inc. operates, governments often have complex and significant restrictions on trade in military and dual-use goods, technology, and services, as well as trade with certain countries.

3V Precision Machining, Inc. complies with all trade restrictions and import and export control laws of the countries in which we operate. We expect all of our business partners, third parties, consultants, and contractors to do the same. Limited exceptions may apply in cases where such laws conflict with U.S. laws (see Boycotts below).

Export rules may restrict the following:

- Any oral discussion with any non- U.S. person, even someone inside the United States, which

discloses technical information and might be considered an export.

- Using business knowledge outside of the employee’s country, such as when providing technical assistance to others.
- Transferring technical data to someone in another country, such as through the Internet, e-mail, conversations, meetings, and network or database access. This restriction applies to sharing information with other 3V Precision Machining, Inc. employees, as well as non-employees.
- Transferring technology to non-U.S. persons, whether located inside or outside the U.S.
- Transferring technology from an authorized non-U.S. person to one that is not authorized.
- Transporting 3V Precision Machining, Inc. assets with certain technology, such as a computer an employee takes on a business or personal trip to another country.

Trade restrictions also involve prohibitions against dealing with specifically identified sanctioned or embargoed countries or entities acting on their behalf, as well as on transactions involving certain named persons or organizations.

Make sure you:

- Comply with all export and import laws, regulations, and requirements and with 3V Precision Machining, Inc. trade control policies.
- Understand the trade controls related to 3V Precision Machining, Inc. products, technology, and information and the restrictions on transferring those items to entities outside 3V Precision Machining, Inc.
- Obtain licenses or other government approvals prior to exporting and importing products and technology controlled by the Government.
- Report any known or suspected trade control violation to your local 3V Precision Machining, Inc. trade compliance office or the Office of International Trade and Compliance.
- Report complete, accurate, and detailed information regarding every imported product including its proper classification, country of origin and appropriate value.

Boycotts

BOYCOTTS – occur when a person, group, or country refuses to do business with certain persons, groups, or countries as a means of protest, an expression of disfavor, or a method of coercion.

We may not participate in or promote boycotts that the United States does not support, such as the Arab League Boycott of Israel. This means that we may not agree to a contract, document, or verbal request containing language that could be interpreted as an attempt by a person, group, or country to enforce an unsanctioned boycott.

Make sure you:

- Review all transactional documents, including contracts, letters of credit, shipping or import documents, or bid and proposal materials, for any language that may constitute a boycott request.
- Notify the Legal Department if requested to join in, support, or furnish information concerning a non-U.S. boycott.

Political Involvement

OUR STANDARD: Do not support political parties on 3V Precision Machining, Inc.'s behalf or engage in prohibited lobbying activities.

We believe that our employees benefit from being active in the community through good citizenship. We recognize that our employees have a right to voluntarily participate in the political process including volunteering in campaigns and making individual political contributions.

3V Precision Machining, Inc. also has a clear and separate responsibility to obey all applicable laws and regulations regarding operation of a corporate Political Action Committee and employing registered lobbyists for 3V Precision Machining, Inc. business. These separate individual and 3V Precision Machining, Inc. activities need not be in conflict provided that employees exercising their rights do so only in their own name and on their own time.

Never use 3V Precision Machining, Inc.'s name, funds, assets, services or facilities to support any political candidate or party or to engage in any lobbying activity unless specifically permitted by law and authorized in advance by the Government Relations Department.

Make sure you:

- Consult with our government relations professionals BEFORE interacting with government officials in a manner that might be interpreted as a lobbying activity.
- Ensure that your personal political views and activities are not viewed as those of 3V Precision Machining, Inc.
- Do not use 3V Precision Machining, Inc.'s name, resources, or facilities to support your personal political activities.
- Never apply direct or indirect pressure on another employee, customer, or business partner to contribute to, support, or oppose any political candidate or party.
- Avoid the appearance that you are making political or charitable contributions in order to gain favor on behalf of 3V Precision Machining, Inc.
- Notify management prior to accepting or campaigning for political office.

Responsibilities: Business Partners

Honest and Ethical Dealings

OUR STANDARD: Maintain a culture of integrity by being honest and ethical in business relationships.

We treat all of our business relationships fairly: the government, our non-government customers, business partners, third parties, suppliers, and contractors. We work to understand and meet their needs, while always remaining true to our own ethical standards. We tell the truth about our services

and capabilities and we do not make promises we know we cannot keep. In short, we treat our business partners as we would like to be treated.

We expect our customers, business partners, and stakeholders to act in a manner that is consistent with our ethical standards and we must bring suspected unethical or illegal activity on their part to the immediate attention of 3V Precision Machining, Inc.'s Legal Department.

Make sure you:

- Talk to your supervisor if you have concerns about any error, omission, undue delay, or defect in quality or customer service.
- Report pressure from colleagues or managers to cut corners on quality or delivery standards.
- Never follow a customer's or third parties request to do something that you regard as unethical or unlawful.
- Respond promptly to customer and business partner requests and questions.
- Promise what you can deliver and deliver on what you promise.

Procurement Integrity

OUR STANDARD: Understand and comply with the procurement integrity laws and regulations.

BID OR PROPOSAL INFORMATION – typically proprietary information submitted by the bidding entity.

SOURCE SELECTION INFORMATION – is any information prepared or use by a federal agency for evaluating bids or proposals to enter into a procurement contract.

Since we conduct business with governments and government-owned entities, we are committed to compliance with many special legal, regulatory and contractual requirements that apply to government contracting.

In compliance with the Procurement Integrity Act, we will not disclose or use any unauthorized confidential contractor bid or proposal information, or source selection information before a contract award. Employees should contact their Contracts or Legal Departments with questions specific to contracting with the government.

Hiring Former Government or Military Personnel

The U.S. Government and other countries have laws and special restrictions that apply to the recruitment and hiring of current and former government employees and military personnel as employees, consultants, or representatives. Restrictions include limitations on the type and timing of employment-related discussions that government employees may have with 3V Precision Machining, Inc. We must ensure that such employment discussions are approved in advance by 3V Precision Machining, Inc. Human Resources and Legal Departments.

Make sure you:

- Avoid seeking or receiving information that 3V Precision Machining, Inc. is not authorized to possess, such as confidential or proprietary data, pricing information of other competitors and non-public government documents relating to bidding or source selection.
- Seek immediate guidance from your division's legal counsel if you inadvertently receive unauthorized bid or proposal or source selection information.
- Comply with government conflict of interest restrictions.

Organizational Conflicts of Interest (OCI)

OUR STANDARD: Disclose any potential organizational conflicts of interest.

We are required to recognize and avoid organizational conflicts of interest in connection with direct or indirect contracts with the U.S. Government. An OCI may arise where activities of 3V Precision Machining, Inc., our employees, partners or competitors could impair the ability of another to render impartial services to a direct or indirect contract with the government. This could also give an unfair advantage in competing for a contract because of access to information obtained as a result of other contractual relationships with the government.

Business Partner Relations

OUR STANDARD: Business partner relationships must be based on mutual trust and a commitment to act with integrity.

We deal fairly with our suppliers, consultants, and other third parties and we expect them to act with integrity. In dealings with 3V Precision Machining, Inc., we expect business partners to follow the spirit of the Code, as well as any applicable contractual provisions, when working on behalf of 3V Precision Machining, Inc.

Due Diligence

Appropriate due diligence must be performed by 3V Precision Machining, Inc. before engaging any third-party that will be marketing or distributing 3V Precision Machining, Inc. products and services outside the United States, including enhanced due diligence for third parties who will have contact with U.S. and non-U.S. government customers and other government employees and officials on behalf of 3V Precision Machining, Inc.

Supplier Diversity

Recognizing the importance and benefits of a diverse supplier base, we will work to identify qualified minority and woman owned business enterprises, small business and local business enterprises capable of providing products and services.

Subcontractor Code of Ethics Provisions

For U.S. government contracts above a specific value, the law requires that we will ensure applicable subcontracts include the provision to have and maintain a code of conduct and an ethics and compliance program that includes training, an internal reporting mechanism and discipline for code violations.

Product Origin, Quality and Substitution

Our customers, both government and commercial, have the right to insist on strict compliance with contract requirements. We must only deliver products that conform to the contract's specified requirements. We must avoid the substitution of lower quality, different, or inadequately tested products. We must also ensure that suppliers of raw materials, parts, and components used in our products meet our contract requirements.

Conflicts of Interest

OUR STANDARD: [Disclose and seek guidance on any issues that potentially may conflict with your responsibilities with 3V Precision Machining, Inc.](#)

A conflict of interest occurs whenever you have competing interests that may interfere with your ability to make an objective decision in the best interest of 3V Precision Machining, Inc. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict of interest as it could undermine the trust that our customers, business partners, fellow employees, and the public place in us. Below are some areas in which potential conflicts of interest may arise:

Personal Relationships

Personal relationships with employees or business partners, such as family members, friendships, and romantic partners, who have influence over one another through the chain of command, in purchasing or contracting decisions, in bidding or proposal related efforts, or in recruiting or hiring decisions.

Financial Dealings and Investments

Situations where you or a family member has a significant financial ownership interest in a privately owned enterprise with which 3V Precision Machining, Inc. competes or does business.

Outside Employment

Since outside employment may appear to bias our decisions in the best interest of 3V Precision Machining, Inc., we may not be employed by, work as a consultant for, or be affiliated with a 3V Precision Machining, Inc. competitor, customer, or supplier. You should always discuss any outside work situations with your supervisor prior to undertaking them.

Make sure you:

- Always make business decisions in the best interest of 3V Precision Machining, Inc. Seek guidance to avoid potential conflicts of interest.
- Disclose potential conflicts immediately by notifying your supervisor or HR in writing.

Business Intelligence

OUR STANDARD: Obtain competitive information only through proper means.

Information about competitors is a valuable asset in today's competitive business environment. When collecting business intelligence, 3V Precision Machining, Inc. employees and others who are working on our behalf must always live up to the highest ethical standards.

We must never engage in fraud, misrepresentation, or deception to obtain information. Nor should we use invasive technology to "spy" on others. We also need to be careful when accepting information from third parties. You should know and trust their sources and be sure the knowledge they provide is not protected by trade secret laws, or non-disclosure or confidentiality agreements.

When 3V Precision Machining, Inc. employs former employees of competitors, we recognize and respect the obligations of those employees not to use or disclose the confidential information of their former employers.

Make sure you:

- Do not request or receive the confidential information of other companies.
- Never pressure new employees to discuss confidential information from their previous employer.
- Do not disclose suppliers' non-public pricing information.
- Never retain papers or computer records from prior employers in violation of laws or contracts.
- Do not seek information obtained through any behavior that could be construed as "espionage", "spying" or which you would not be willing to fully disclose.

Responsibilities: Shareholders

Accuracy of Records

OUR STANDARD: Maintain current, accurate, and complete business records.

RECORDS – are any information generated during the course of 3V Precision Machining, Inc. business and include not just paper documents, but also tapes, photo- graphs, computer files, and records in any other form.

Our shareholders, business partners, customers, government officials, and the public need to be able to rely on the accuracy and completeness of our disclosures and business records. Accurate information is also essential within 3V Precision Machining, Inc. so that we can make good decisions.

We are responsible for honesty and transparency in the preparation and maintenance of our business records, including our timecards, expense reports, quality, safety, and procurement records. Employees with a role in financial or operational recording or reporting have a special responsibility in this area, but all of us contribute to the process of recording business results and maintaining records. Each of us is responsible for helping to ensure the information we record is accurate, complete and maintained in a manner that is consistent with our internal controls.

Charging Costs

All costs allocated to a government contract as direct or indirect costs must be reasonable, allocable, and allowable under applicable procurement cost principles and Cost Accounting Standards in accordance with applicable Disclosure Statements. In addition, when we work on government contracts or subcontracts, we must:

- accurately record the number of hours worked to the appropriate project
- charge all labor and material costs to the proper contract and charge indirect costs properly
- ensure only costs properly chargeable to a government contract are billed to the government

Records Retention

We are responsible for the information and records under our control and we must be familiar with the recordkeeping procedures that apply to our jobs. It is also our responsibility to keep our records organized so that they can be located and retrieved when needed.

Documents should only be destroyed in accordance with our record retention schedule, and never in response to, or in anticipation of, an investigation, audit, or pending litigation. Contact the Legal Department if there is any doubt about the appropriateness of record destruction.

Legal Holds

A legal hold suspends all document destruction procedures, including deletion of emails and computer files, in order to preserve appropriate records under special circumstances, such as litigation or government investigations. 3V Precision Machining, Inc. will determine and identify what types of records are required to be placed under a legal hold.

Every employee, agent and contractor must comply with this policy.

If there is any question as to whether a record pertains to an investigation or legal proceeding, contact the Legal Department prior to disposing of any related records.

Policy

All employees are personally responsible for conducting business both internally and externally with all stakeholders ethically and compliantly in accordance with our values, Code of Conduct, corporate policies, and in compliance with all laws and regulations globally. As such, this policy provides the governance framework for reporting, capturing, handling, and resolving potential improper conduct and compliance violations.

Issue Reporting

Any stakeholder who suspects or becomes aware of any ethical misconduct of values, Code of Conduct, or any compliance violations of any laws or regulations is encouraged to report the issue to any of the following:

- Employee's supervisor/manager
- Any Human Resources or Legal representative
- Any compliance representative in the areas of Ethics & Compliance, Internal Audit/Finance, ESH, Security, or Trade

In addition, any employee who has any concern or complaint regarding accounting, internal accounting controls, or auditing matters may also report the matter to the General Auditor or may also contact the Audit Committee on a confidential and/or anonymous basis by mail, c/o the Corporate Secretary.

Retaliation

3V Precision Machining, Inc. will not tolerate retaliation against any stakeholder that reports potential ethics and compliance concerns in good faith (a genuine attempt to provide honest, complete and accurate information, even if it later proves to be mistaken or unsubstantiated).

Retaliation includes but is not limited to improper denial of benefits, termination, demotion, suspension, threats, poor performance evaluation, intimidation, harassment or discrimination.

Retaliation violates both the Code of Conduct and corporate policy; therefore, all known or suspected retaliation cases should be reported for investigation and resolution through the reporting channels listed above.

Issue Handling

Each business area is required to have a designated management team to ensure proper oversight of individual cases and case trends.

Upon being informed of an issue, management team members should collaborate with each other to:

- Determine the action level (severity), consult with HQ for issues classified as “significant”
- Determine whether an investigation is warranted and, if so, define scope and assign an investigation leader

Investigation leader shall:

- Assemble all relevant information, conduct interviews, and perform records analysis
- Conduct a complete and impartial evaluation of the facts obtained
- Prepare an investigation report and recommendations for corrective actions

Details of all ethics & compliance issues, investigations and corrective actions are sensitive and confidential 3V Precision Machining, Inc. information that should be shared on a need-to-know basis only.

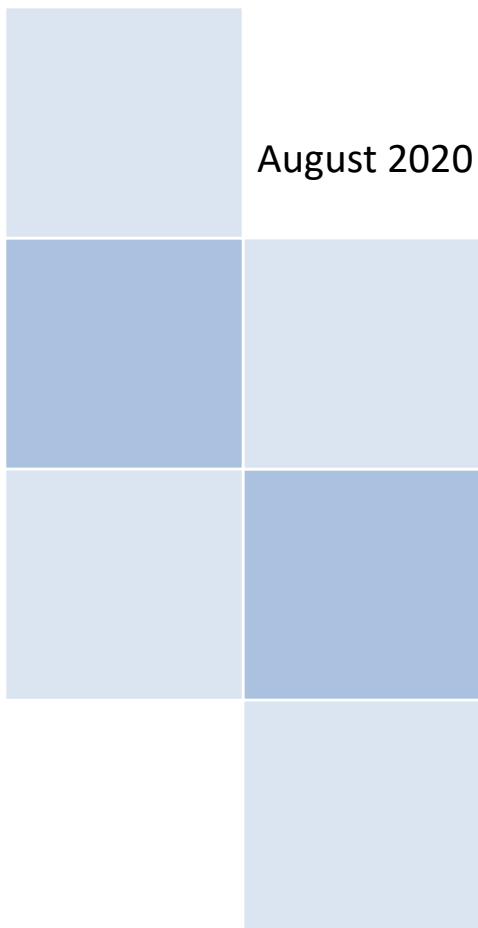
Issue Resolution

The management team shall ensure that the resolution of all cases is complete and documented, and that appropriate corrective actions are identified and instituted.

Government or Third-Party Notification

Approval to share information to third parties including customers and governmental agencies is at the discretion of the management team.

Case Management Procedure



Scope and Application

This guide describes the life cycle of the case management process from intake of concerns to the implementation of corrective and/or disciplinary actions. It also describes the roles and responsibilities of those involved in the process.

This guide is for those who have roles and responsibilities in this process. The process describes standard steps taken in a typical sequence when an employee reports a concern. Cases vary widely in their purview, complexity, and impact. As such, practitioner judgment is used regarding the steps appropriate to the individual circumstance faced.

Nothing in this process is intended to change, modify or alter the “at will” employment relationship between an employer and its employees; therefore either 3V Precision Machining, Inc. or the employee can terminate the employment relationship at any time with or without cause or notice.

Definitions

Case Management System

The Case Management System (“System”) is a centralized database of complaints. It is used to document new complaints, questions and feedback, and steps taken by people involved in the process. The System also provides the means for analysis of collected data and the production of charts, spreadsheets, and other analytical tools related to that data. (Note: several commercial vendors provide software and/or services that provide this support.)

Investigation Plan

An Investigation Plan is a document prepared by the Investigator that lays out the fact-finding process to be followed. It describes background documentation to be gathered and interviews to be conducted.

Investigative Report

An Investigative Report is a document prepared by the Investigator to provide information needed during a second level review to determine: whether a case is substantiated; appropriate corrective and/or disciplinary actions and root cause analysis for substantiated cases.

Written Determination

A Written Determination is a document that records findings on the validity of the case and, as applicable, the root cause. The Written Determination also specifies the corrective and/or disciplinary action that will be carried out in substantiated cases.

Roles & Responsibilities

Distinct roles are described below although one person may fulfill more than one role simultaneously. The roles are collapsed and combined as needed while being mindful to avoid any real or perceived conflicts of interest, such as a manager investigating a case against someone in his/her reporting line. Any individual with an apparent conflict of interest makes the conflict known and recuses him/herself.

Referring Source

A Referring Source is any individual who reports potential misconduct or illegal activity. Referring Sources can be employees, customers, subcontractors, or anyone else who expresses concerns about the conduct of 3V Precision Machining, Inc. employees, customers, or subcontractors.

Intake Individuals

Intake Individuals are representatives of the disclosure channels outlined in the Intake section of this document. They are responsible for documenting the details of the reports they receive and sending the reports for assignment to an Investigator.

Subject

The Subject is the person the Referring Source alleges is engaged in misconduct or illegal activity.

Investigative Functional Leads

Investigative Functional Leads (i.e., designated lead for HR, Legal, Security, Audit, Ethics or similar corporate functions) are responsible for:

- Choosing the appropriate individuals to lead investigations in their functional areas
- Supervising investigations conducted in their functional areas
- Ensuring cases in their functional area receive a second-level review to
 - Determine the sufficiency of the investigation
 - Determine case substantiation (whether the evidence supports the claim)
 - Make a root cause determination in substantiated cases
 - Determine the appropriate corrective and/or disciplinary action in substantiated cases

Investigators

Investigators are responsible for:

- Conducting fact-finding investigations
- Creating Investigative Reports for second-level review

- Documenting their investigations and the results in the System
- Informing management of investigations (as appropriate, with guidance from Investigative Functional Leads and HR BPs)
- Answering questions asked about their investigations and facts/information discovered

Human Resources Business Partners (HR BPs)

HR BPs are responsible for:

- Serving as resources to assist Investigators in determining which managers should be informed during each stage of the investigation
- Assisting management in carrying out the corrective and/or disciplinary actions determined
- As appropriate, briefing the Referring Source and Subject on the results of the Investigation
- Partnering with a System Administrator to follow up with the Referring Source to ensure no retaliation has occurred

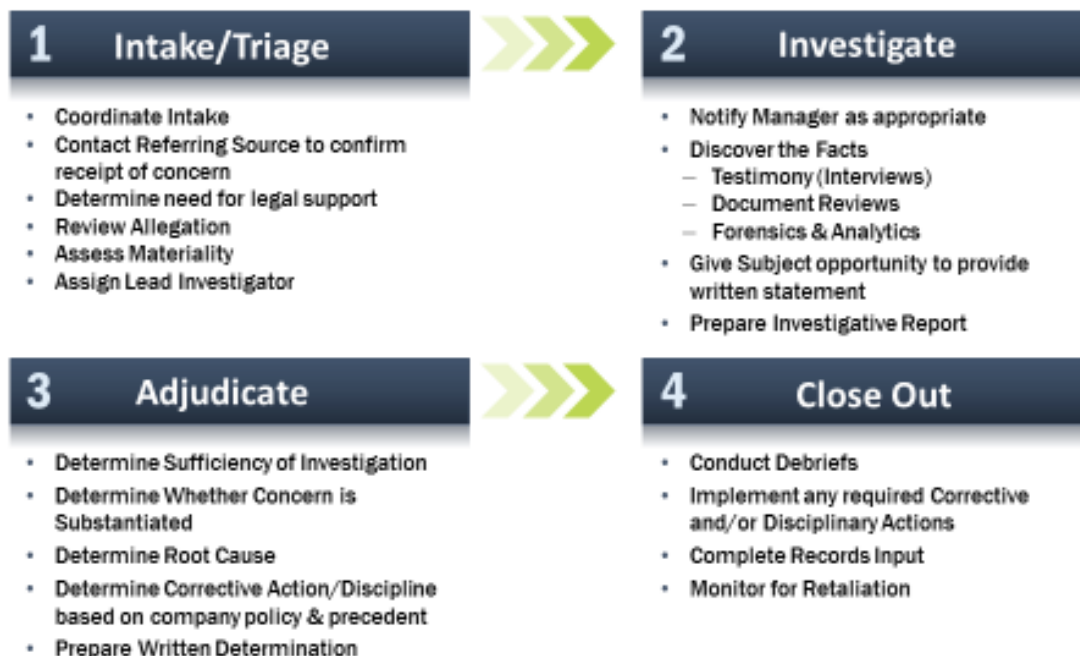
Management (of the Subject in the case)

Management provides input into decisions about the appropriate corrective and/or disciplinary action(s) in substantiated cases and works with the HR BP to implement the corrective and/or disciplinary action(s) determined.

Process Guidance

Overview

Case Management Process



Non-Retaliation Policy

Overview

This policy, which applies to all employees, is to confirm 3V Precision Machining, Inc.'s commitment to non-retaliation and providing an environment that supports any individual who in good faith seeks advice, raises a concern, or reports perceived or observed misconduct.

Key Terms

“in good faith” – making a genuine attempt to provide honest, complete, and accurate information, even if it later proves to be unsubstantiated or mistaken.

Retaliation – occurs when an employer takes adverse employment action against an employee for engaging in a legally-protected activity, such as complaining about discrimination or harassment internally or to an outside body such as the Equal Employment Opportunity Commission or requesting a legal right such as a reasonable accommodation.

Examples of adverse employment actions include demotion, discipline, termination, salary reduction, or reassignment.

Policy

3V Precision Machining, Inc. prohibits any retaliation against an employee who, in good faith, asks questions, reports possible violations of the Code, policy, or law, or participates in an official investigation.

Employees are to immediately report, using any of the avenues listed in the Code of Conduct, any witnessed or suspected retaliation. All reports of retaliation shall be thoroughly investigated and employees engaging in retaliation will be subject to disciplinary action, up to and including termination.

All supervisors and managers shall:

1. maintain a work environment free of retaliation and respond immediately and appropriately to complaints or indications of such behavior
2. bring complaints to the attention of Human Resources, Ethics Office, and/or Legal
3. administer disciplinary and other corrective action toward any individual determined to have violated this policy

Investigations

Complaints of retaliation will be promptly, fairly and thoroughly investigated and, where necessary, appropriate corrective action will be taken. Employees are required to cooperate fully with 3V Precision Machining, Inc.'s investigations. To the extent possible, confidentiality will be maintained consistent with applicable legal and ethical considerations.

An employee shall not:

- Interfere with or obstruct an investigation
- Conduct his or her own investigation
- Destroy records, information or evidence reasonably known to be related to an investigation
- Be knowingly untruthful or knowingly misrepresent or omit facts material to an investigation
- Retaliate against others because of their involvement in an investigation

Employees who are found to have engaged in retaliation will be subject to disciplinary action, up to and including termination.

In addition, members of management who fail to respond to complaints of retaliation or fail to act upon their knowledge of known or suspected violations of this policy will likewise be subject to disciplinary action, up to and including termination.

Conflicts of Interest Policy

Overview

The purpose of this policy is to identify those activities and relationships in which all 3V Precision Machining, Inc. officers and employees may not engage due to the possibility of a conflict of interest with respect to their obligations to 3V Precision Machining, Inc.

Key Terms

Business Associate – any organization or individual that conducts or seeks to conduct business transactions with 3V Precision Machining, Inc., which includes, but is not necessarily limited to, customers, contractors, subcontractors, suppliers, vendors, consultants, agents, joint venture members, teaming agreement members, and governmental agencies.

Policy

All employees are expected to recognize and avoid engaging in any activities or relationships that would influence or appear to influence their ability to fulfill their duties to 3V Precision Machining, Inc., or to make objective, ethical business decisions on behalf of 3V Precision Machining, Inc.

Disclosure

Upon being alerted to an employee's actual or perceived conflict of interest, supervisors are required to notify Human Resources or Ethics for resolution.

Violation

Any employee violating this policy or failing to notify management of a potential conflict of interest shall be subject to disciplinary action up to and including termination.

Potential Conflicts of Interest

Employees are encouraged to participate in professional societies and associations, and volunteer in local/civic activities in so much that their ability to fulfill their duties to 3V Precision Machining, Inc. is not compromised.

Although the following list is not intended to be all encompassing, except as otherwise approved by HR or Ethics, the following activities are considered potential conflicts of interest that must be avoided and disclosed.

- **Acceptance of Gifts**

Employees or their immediate family members may not accept remuneration, gifts, or benefits of more than nominal value from business associates in connection with 3V Precision Machining, Inc. business. Acceptance of cash or cash equivalent, such as gift cards, of any amount, even if of nominal value, is strictly prohibited.

- **Personal Relationships**

Although not all personal relationships give rise to a conflict of interest, employees are expected to recognize, avoid, and disclose situations where personal relationships with other 3V Precision Machining, Inc. employees, business associates, or competitors appear to influence an employee's judgment. This is especially true where the personal relationship involves a member of your household, a close relative or friend who has influence through the chain of command, in purchasing or contracting decisions, in customer bidding or proposal related efforts, or in recruiting or hiring decisions.

- **Political Office**

Although 3V Precision Machining, Inc. recognizes the right of employees to seek an elected government office, employees are required to disclose such efforts in order to avoid any potential conflicts of interest.

- **Financial Interests**

Employees and their immediate family members may not have a substantial financial interest in any

enterprise that is a business associate of 3V Precision Machining, Inc., except for passive investments as part of a personal investment program.

- **Affiliation or Employment**

Employees shall not have business affiliation or employment with 3V Precision Machining, Inc. business associates or competitors without prior approval. However, subject to time availability and consistent with good industry practice, employees are encouraged to engage in professional associations and in civic and charitable activities as appropriate and in accordance with personal and 3V Precision Machining, Inc. interests.

- **Facilities, Property, & Assets**

Employees may not use facilities, 3V Precision Machining, Inc. time, or assets belonging to 3V Precision Machining, Inc. in pursuit of non- 3V Precision Machining, Inc. business activities.

Time Charging Policy

Overview

The purpose of this policy is to provide timekeeping guidance within 3V Precision Machining, Inc. to ensure accurate time recording of all 3V Precision Machining, Inc. personnel, directly and indirectly supporting 3V Precision Machining, Inc. contracts. Specifically, this policy establishes guidelines and procedures for preparing, submitting and correcting time within the timekeeping system.

This policy applies to all 3V Precision Machining, Inc. Employees.

Key Terms

Direct Cost - Any cost that can be identified specifically with a final cost objective.

Indirect Cost - Any cost not directly identified with a single, final cost objective, but identified with two or more final cost objectives or an intermediate cost objective.

Policy

Federal regulations and contractual obligations require accurate reporting of labor hours for recording contract labor costs and creating payroll expense. 3V Precision Machining, Inc.'s policy is to maintain a reliable and accurate timekeeping system that accurately records labor for all clients and complies with U.S. government timekeeping requirements.

All employees are expected to be familiar with 3V Precision Machining, Inc.'s timekeeping procedures and to be prepared at any time to demonstrate compliance during internal and government audits.

3V Precision Machining, Inc. employees incurring both direct labor hours and indirect labor hours, shall be required to timely and accurately:

- Charge time to appropriate job codes,
- Charge time based on activities performed,
- Complete time report daily,
- Account for all time worked,
- Ensure unallowable or non-billable labor costs are properly flagged and segregated,
- Ensure that audit trails exist for any material changes to their labor or timekeeping report, Authenticate any change to labor or timekeeping report at the end of each reporting period,
- If acting as a supervisor, perform reasonable inquiry of the labor and timekeeping reports provided by subordinate personnel prior to approving the completeness and accuracy of such documentation at the end of each reporting period.

To ensure compliance with this policy, 3V Precision Machining, Inc. employees shall receive periodic training on the importance of keeping timely and accurate labor and timekeeping reports and 3V Precision Machining, Inc. management will periodically test compliance with this policy by performing, among other methods, random desk audits.

Anti-Corruption-Business Courtesies Policy

Overview

This policy prohibits 3V Precision Machining, Inc. employees from engaging or participating in bribery, kickbacks and other forms of improper payments and sets limits on giving business courtesies. This policy applies to all 3V Precision Machining, Inc. employees.

Key Terms

Commercial Customer - includes: Any individual or entity that is not wholly or partially owned by the government.

U.S. Government Officials - includes: Any person working for a local, municipal, state, or federal government agency, entity, or body (including executive, legislative, judicial, and regulatory agencies/bodies) in the United States.

Foreign Official -

- Non-U.S. government official (includes municipal, provincial, central, federal, or any other level of government)
- Officer or employee of a foreign (non-U.S.) government or any department, agency, ministry, or instrumentality thereof (includes executive, legislative, judicial, and regulatory agencies/ departments)

- Person acting in an official capacity on behalf of a foreign government or any department, agency, ministry, or instrumentality thereof
- Officer or employee of a 3V Precision Machining, Inc. or business owned or controlled in whole or in part by a foreign (non-U.S.) government (“state owned enterprise”)
- Officer or employee of a public Int’l organization such as the United Nations or the World Bank
- Member of a royal family
- Foreign political party, member, or official thereof
- Candidate for foreign political office, and
- Elected officials of foreign (non-U.S.) countries, civil servants and military personnel
- may also include the children, spouses, or other close relatives of Foreign Officials

Business Courtesies – Includes cash, entertainment, meals, gifts, social events, sporting events, travel, lodging, favors, gratuities, discounts and services.

Gifts – Shall mean any tangible object of any kind regardless of value.

Nominal or *de minimis* – Gifts that are small or token in nature and provided in accordance with local law and customs.

Third-Party - Agent, representative, distributor, intermediary, labor broker, subcontractor, freight forwarder, dealer, consultant, or any other type of third-party retained by 3V Precision Machining, Inc. to conduct business with foreign government officials and/or foreign commercial customers.

Policy

At 3V Precision Machining, Inc., bribery is never permitted, regardless of whether a 3V Precision Machining, Inc. employee is dealing with a government or commercial customer or employee. 3V Precision Machining, Inc. and its employees compete on the merits and not through bribes, kickbacks, or other improper payments of any kind. All 3V Precision Machining, Inc. third-parties must follow national legal and ethical standards including all applicable anti-corruption laws and regulations in every country in which 3V Precision Machining, Inc. does business, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act and similar anti-corruption laws worldwide.

Companies and individuals dealing with 3V Precision Machining, Inc. must be engaged in providing legitimate business services in the countries in which they operate. This includes the owners of the companies (or others with a financial interest), their employees, and agents or representatives.

The U.S. FCPA prohibits a 3V Precision Machining, Inc.'s employees, as well as its third-parties, from offering or providing money or anything of value to foreign officials if offered or given in order to obtain an improper business advantage.

The UK Bribery Act prohibits a 3V Precision Machining, Inc.'s employees as well as its third-parties from offering or providing money and anything of value to foreign officials or commercial customers.

It also provides sanctions for failing to prevent bribery.

3V Precision Machining, Inc. employees and its agents and representatives are prohibited from offering or giving anything of value to, or for the benefit of, any U.S. Government Official, Foreign Official or Commercial Customer for the purpose of obtaining or retaining business, to secure any improper advantage, or to request, accept or agree to receive bribes, kickbacks or other improper payments.

This means 3V Precision Machining, Inc. employees may not be involved in:

Bribery of Government Officials – directly or indirectly (through an agent, any type of third-party, relative or other person) offer, authorize, promise, or give bribes, kickbacks, payoffs, or other payments or transfers of anything of value to any U.S. or foreign (non-U.S.) government officials for the purpose of obtaining or retaining business or securing any improper advantage;

Commercial Bribery – directly or indirectly offer, authorize, promise, or give bribes, kickbacks, payoffs, or other payments or transfers of anything of value to commercial (non-government) customers for the purpose of obtaining or retaining business or securing any improper advantage; or taking Bribes and Kickbacks – directly or indirectly request, agree to receive, or accept kickbacks, payoffs or other payments or transfers of anything of value in connection with 3V Precision Machining, Inc. business.

Use of Third Parties and Project Partners - Improper payments made on behalf of 3V Precision Machining, Inc. by third parties such as sales agents, consultants, intermediaries, distributors, and joint venture, consortium, teaming and other project partners are strictly prohibited. No one shall ever be used as an instrument to make improper payments in connection with 3V Precision Machining, Inc. business.

3V Precision Machining, Inc. cannot do indirectly what it is prohibited from doing directly. Appropriate due diligence must be performed by 3V Precision Machining, Inc. before engaging any third-party, including enhanced due diligence for third parties who will have contact with foreign (non-U.S.) government customers and other government employees and officials on behalf of 3V Precision Machining, Inc.

Facilitating Payments - Facilitating payments are sometimes known as “grease payments.” These are small sums of money or gifts that are given to low level Foreign Officials to facilitate or hasten the performance of a routine governmental action.

3V Precision Machining, Inc. prohibits facilitating payments, with only rare exceptions such as in situations where the individual’s health or safety is being imminently threatened. Although U.S. law permits such payments under very limited circumstances, many countries’ laws, including the UK Bribery Act, consider facilitating payments to be illegal, prohibited bribes.

The UK Bribery Act prohibits all individuals and entities with a connection to the United Kingdom from making facilitating payments.

Business Courtesies

Foreign Officials - Certain expenses including but not limited to gifts, business entertainment, payment of travel expenses, lodging, and meals (“business courtesies”) may be considered bribes, as may any other thing of value, if offered or given in order to obtain an improper business advantage.

3V Precision Machining, Inc. employees must therefore consult with 3V Precision Machining, Inc.’s Legal department prior to making a gift, providing entertainment, paying travel expenses, or providing or promising anything of value to Foreign Officials and customers with the exception of nominal or *de minimis* gifts that are in accordance with this policy.

U.S. Government Officials - Where permitted under applicable statutes and regulations or congressional ethics rules, reasonable *de minimis* hospitality, including but not limited to coffee and pastries at business meetings or nominal, 3V Precision Machining, Inc. branded items (such as pen, coffee mug, or similar), may be extended to U.S. Government Officials without prior approval. All other business courtesies must be approved in advance by the Legal department.

Commercial (Non-Government) Customers - All business courtesies provided to commercial customers must be reasonable, provided in good faith, infrequent, for a legitimate business purpose and consistent with local law and custom. Payment of certain expenses for commercial customers to include travel, lodging and meals *may* require prior approval from 3V Precision Machining, Inc. Legal.

Charitable Contributions to Foreign Entities - Charitable contributions or donations to organizations outside of the United States (Foreign Entities) cannot be made by or on behalf of 3V Precision Machining, Inc. for the personal, financial, or political benefit of a Foreign Official or his family, a foreign political party, or any candidate for a foreign political office. Charitable contributions by or on behalf of 3V Precision Machining, Inc. to Foreign Entities must be reviewed and approved in advance of payment by 3V Precision Machining, Inc. Legal Department.

Charitable contributions or donations to organizations within the United States shall be made in accordance with 3V Precision Machining, Inc. internal policy and procedure.

Political Contributions - 3V Precision Machining, Inc. shall not be involved in the political affairs of any foreign country, and no 3V Precision Machining, Inc. funds or assets shall be used for any partisan political purposes in a foreign country.

Use of 3V Precision Machining, Inc. Funds and Assets and Maintenance of a System of Internal Controls - All 3V Precision Machining, Inc. employees must promptly and accurately account for all expenditures made to, for the benefit of, or on behalf of a Foreign Official in 3V Precision Machining, Inc.’s books and records. Approved expenditures must be made and recorded based on adequate supporting documentation, for the purpose described by the documents supporting the payment, and in accordance with appropriate 3V Precision Machining, Inc. accounting procedures.

All 3V Precision Machining, Inc. managers are responsible for having in place appropriate controls for corporate funds and assets. 3V Precision Machining, Inc. funds and assets shall only be used for lawful and proper purposes. No 3V Precision Machining, Inc. fund or asset shall be used unless the stated purpose is the actual purpose of the expenditure and unless the use is authorized in writing, if authorization is required. 3V Precision Machining, Inc. will not have any undisclosed or unrecorded fund or asset. No false entries shall be made in any records.

Each manager shall maintain an adequate system of internal controls which provides reasonable assurance that: assets are safeguarded; transactions are executed in accordance with management's authorization and properly recorded; financial records are accurate; and violations are detected and corrected.

Training - Training is the foundation of any successful anti-corruption program. All 3V Precision Machining, Inc. employees will receive periodic training on 3V Precision Machining, Inc.'s Code of Conduct and/or targeted anti-corruption training.

Reporting Allegations of Corruption and Related Conduct - All information or allegations of commercial or government bribery, kickbacks, and related improper conduct shall be promptly reported to 3V Precision Machining, Inc. Legal Department. 3V Precision Machining, Inc. prohibits retaliation for good faith reports of suspected misconduct.

Use of Third-Parties Operating Outside the U.S. Policy

Overview

This policy sets forth 3V Precision Machining, Inc. requirements for engaging any third-party to interface with foreign (non-US) governments or foreign (non-US) commercial customers.

This policy applies to all 3V Precision Machining, Inc. employees using third parties on behalf of 3V Precision Machining, Inc. outside the United States.

Key Terms

Foreign Official - includes any:

- Non-U.S. government official (includes municipal, provincial, central, federal, or any other level of government)
- Officer or employee of a foreign (non-U.S.) government or any department, agency, ministry, and instrumentality thereof (includes executive, legislative, judicial, and regulatory agencies/departments)
- Person acting in an official capacity on behalf of a foreign government or any department, agency, ministry, or instrumentality thereof

- Officer or employee of a 3V Precision Machining, Inc. or business owned or controlled in whole or in part by a foreign (non-U.S.) government (“state owned enterprise”)
- Officer or employee of a public Int’l organization such as the United Nations or the World Bank
- Member of a royal family
- Foreign political party, member, or official thereof
- Candidate for foreign political office, and
- Elected officials of foreign (non-U.S.) countries, civil servants and military personnel

The term also includes the children, spouses, or other close relatives of Foreign Officials.

Third-Party - includes any agent, representative, distributor, intermediary, labor broker, dealer, subcontractor, freight forwarder, consultant, joint venture or teaming partner, or any other type of third-party retained by 3V Precision Machining, Inc. to conduct business with foreign government officials and/or foreign commercial customers.

Commercial Customer - includes any individual or entity that is not wholly or partially owned by the government.

Policy

3V Precision Machining, Inc. may use third parties in connection with executing its business. 3V Precision Machining, Inc. employees must follow the procedures set forth in this policy. No third-party shall be retained if the third-party, any person employed by, or any person financially interested in the third-party’s business is an employee or official of a customer or potential customer of 3V Precision Machining, Inc. or is a close relative of such an employee or official.

Due Diligence Review

Due diligence must be performed and documented by 3V Precision Machining, Inc. before engaging third parties. Due diligence, at a minimum, will include screening the third-party and known employees against the U.S. and foreign governments denied parties’ lists and an annual compliance certification signed by the third-party.

Increased due diligence will be conducted on third-parties according to their location, type of third-party (i.e. consultant, dealer, marketing representative, subcontractor etc.), estimated volume of sales or amount of subcontract, and the level of contact with foreign commercial customers and Foreign Officials on behalf of 3V Precision Machining, Inc..

Requirement for a Written Agreement

All third parties engaged by 3V Precision Machining, Inc. must have a written agreement that fully describes all services and compensation prior to the performance of any services. A third-party, its employees, and owners must be engaged in providing legitimate business services for a fee or discount not in excess of the customary local rates.

Monitoring Third-Parties

3V Precision Machining, Inc. personnel, who are responsible for engaging third-parties, must monitor the performance of third-parties to ensure that they are complying with all applicable laws, 3V Precision Machining, Inc.'s Code of Conduct, 3V Precision Machining, Inc.'s Policies and Procedures, and contract requirements on all matters including anti-corruption provisions. The business will maintain a list of third parties that, at a minimum, is updated annually.

Payments and Recordkeeping

Accurate books and records must be maintained of payments made to third parties, in accordance with 3V Precision Machining, Inc. Financial policies.

Payments to third parties may only be made after confirmation that services have been performed or goods have been received. No third-party may use its fees or any other funds to make any payments to any Foreign Official, government customer, or commercial customer of 3V Precision Machining, Inc. or any other persons or entities related to their work for 3V Precision Machining, Inc. in violation of US or local law.

Unless otherwise approved in writing by 3V Precision Machining, Inc. Legal department, all payments for products or services must be paid:

- In the name of the third-party named as a party in the signed agreement
- In the location where products or services were performed, unless an out-of-country payment is approved in advance by the Controller after appropriate diligence and legal review
- In local currency. No cash payments may be made without the prior approval of the Controller
- By bank check or wire transfer

Anti-Corruption Compliance Regarding Third Parties

3V Precision Machining, Inc. is committed to conducting its business in accordance with its strict anti-corruption policies, the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and the anti-corruption laws of the countries in which it operates by prohibiting the offer, payment, or receipt of corrupt and other improper payments.

Improper payments made on behalf of 3V Precision Machining, Inc. by third parties are strictly prohibited. No person or third-party shall ever be used as an instrument to make improper payments in connection with 3V Precision Machining, Inc. business. 3V Precision Machining, Inc. cannot do indirectly what it is prohibited from doing directly.

Reference the *Anti-Corruption / Business Courtesies* policy for further information.

U.S. Export & Import Compliance Policy

Overview

The purpose of this policy is to outline 3V Precision Machining, Inc.'s responsibilities as they pertain to U.S. Export and Import compliance. 3V Precision Machining, Inc. shall comply with all applicable laws and regulations, including the International Traffic in Arms Regulations ("ITAR"), the Export Administration Regulations ("EAR"), the Office of Foreign Assets Control ("OFAC") Regulations, the Federal Firearms Regulations ("FFR"), and Other Government Agencies ("OGA's") when conducting business with Foreign Persons. This policy applies to all 3V Precision Machining, Inc. employees, wherever located, and governs deemed exports from the United States (U.S.) as well as items imported into the U.S. by 3V Precision Machining, Inc.

Key Terms

Foreign Persons - Individuals who are not U.S. citizens, U.S. permanent residents (i.e., green card holders), protected persons (i.e., refugees or political asylees) or entities not incorporated to do business in the U.S.

U.S. Persons - Individuals who are U.S. citizens, U.S. permanent residents, protected persons (i.e., refugees or political asylees) or entities incorporated to do business in the U.S. (including U.S. overseas affiliates).

Technical Data - Under the ITAR, information required for the design, development, production, manufacture, assembly, operation, repair, testing, maintenance, or modification of Defense Articles. Under the EAR, information necessary for the development, production, or use of a product.

Defense Article(s) - Hardware, software, Technical Data, or the furnishing of Technical Data or assistance connected with an end item that is specifically / specially designed, developed, configured, adapted, or modified for a military application.

Broker - Any person who engages in brokering activities, in the following categories: 1.) Any U.S. person wherever located; 2.) Any foreign person located in the U.S.; or 3.) Any Foreign Person located outside the U.S. where the Foreign Person is owned or controlled by a U.S. Person.

Brokering Activities - Any action on behalf of another to facilitate the manufacture, export, permanent import, transfer, re-export, or transfer of a U.S. or foreign Defense Article or Defense Service, regardless of its origin.

Defense Service(s) -

1. The furnishing of assistance (including training) using other than public domain information to Foreign Person(s), whether in the U.S. or abroad, in the design, development, engineering,

manufacture, production, assembly, testing, intermediate or depot level maintenance, modification, demilitarization, destruction, or processing of defense articles;

2. The furnishing of assistance to a Foreign Person, whether in the U.S. or abroad, for the integration of any item controlled on the United States Munitions List (“USML”) or items subject to the EAR into an end item or component that is controlled as a defense article on the USML, regardless of origin;
3. The furnishing of assistance (including training) to a Foreign Person regardless of whether Technical Data is transferred, including formal or informal instruction in the U.S. or abroad by any means, in the tactical employment (not basic operation) of a Defense Article.
4. Conducting direct combat operations for a Foreign Person; and
5. The furnishing of assistance (including training) in the integration of a satellite or spacecraft to a launch vehicle, including both planning and onsite support, regardless of the jurisdiction of, the ownership of, or the origin of the satellite or spacecraft, or whether Technical Data is used.

Policy

Many countries have laws that restrict the export of goods and technology. Items which are for military purposes, or which may be involved in the development or production of products or technology for military purposes, are often a primary focus of such controls. The U.S. has regulatory controls that restrict the export of certain products, services, Technical Data and software to other countries and nationals of those countries, as well as the re-export of those items from one non-destination to another.

There are also U.S. Trade embargoes against certain countries and individuals and entities associated with those countries, as well as named terrorists and drug traffickers. 3V Precision Machining, Inc. must comply with all applicable U.S. export control laws, as well as applicable laws of other countries.

Exports

No export-controlled commodity (including 3V Precision Machining, Inc. products), Technical Data (including software), or technical assistance shall be provided in any manner to a Foreign Person, either in the U.S. or abroad, without first complying with all requirements of the ITAR, EAR, OFAC regulations, and other applicable regulations of OGAs, including the requirement for obtaining a license or other approval, or determining the applicability of an exemption or license exception to the transaction.

Imports

All permanent and temporary imports of commodities by 3V Precision Machining, Inc. shall be made in compliance with the provisions of the FFR, the ITAR, and other applicable regulations of OGAs. These regulations may require temporary import licenses, permits, and/or certificates.

The import of products and materials requires that importers use “reasonable care” to ensure that valuation and classification of merchandise is performed correctly and in compliance with U.S. and

non-U.S. Customs' laws and regulations. Importers must also meet the "informed compliance" standards by either developing in-house customs expertise or by enlisting the assistance of a knowledgeable and experienced Customs Broker. Responsibility for compliance rests with any 3V Precision Machining, Inc. employee who directs a foreign shipper to ship goods to a 3V Precision Machining, Inc. facility.

Restricted Party Screening

Prior to entering into any commercial agreement which could involve an export, and before actually initiating such export, all parties to the transaction shall be screened against the restricted parties' lists maintained by various U.S. government agencies.

Marking Technical Documents

All export-controlled Technical Data created by 3V Precision Machining, Inc. should contain one of the following legends based on whether it is controlled by the ITAR or whether it is controlled by the EAR:

Export Warnings for Commercial Items (EAR Legend)

EXPORT CONTROL WARNING:

This document contains Technical Data whose export, transfer, disclosure and further publication is restricted by the applicable export laws and regulations of the United States of America, including the Export Administration Act of 1979, as amended, and the Export Administration Regulations. Violations of these laws and regulations are subject to severe civil, criminal and administrative penalties.

Export Warnings for Defense Articles (ITAR Legend)

EXPORT CONTROL WARNING:

This document contains Technical Data whose export, transfer, disclosure and further publication are restricted by the applicable export laws and regulations of the United States of America, including the U.S. Arms Export Control Act and the International Traffic in Arms Regulations. Violations of these laws and regulations are subject to severe civil, criminal and administrative penalties.

When a document contains information subject to both the ITAR and the EAR, the ITAR Legend should be used. In addition to the applicable Export Control Warning, 3V Precision Machining, Inc. personnel shall take steps to ensure that the specific export classification is provided to outside parties who receive Technical Data and/or products from 3V Precision Machining, Inc..

Electronic Storage Devices

Software and technical data on a laptop, Blackberry, iPad, or other electronic storage device taken on foreign travel are subject to the export control laws of the U.S., and may require a country/3V Precision Machining, Inc.-specific export license or other approval.

Record Keeping

All records relating to exports and imports shall be kept by 3V Precision Machining, Inc. as required under all applicable U.S. regulations.

Violations

Violations of this policy may subject 3V Precision Machining, Inc. to fines, potential suspension or debarment from contracting with the U. S. Government, jeopardize export privileges, and subject employees to fines and/or imprisonment as specified in the ITAR and EAR. Each 3V Precision Machining, Inc. employee has a responsibility to promptly report suspected or known violations of this policy.

Anti-Trust and Fair Competition Policy

Overview

3V Precision Machining, Inc. prohibits all business practices that improperly limit competition in those jurisdictions where 3V Precision Machining, Inc. conducts business. This policy applies to all transactions undertaken by 3V Precision Machining, Inc. employees on behalf of 3V Precision Machining, Inc.

Principal Statutes

Antitrust laws prohibit business practices that improperly limit competition. In the U.S., four principal statutes are designed to provide consumers with the best combination of price and quality:

- *The Sherman Act* prohibits unlawful agreements in restraint of trade and prohibits monopolization and attempts to monopolize.
- *The Clayton Act* prohibits certain customer restraints, acquisitions, and interlocking directorates.
- *The Robinson-Patman Act* prohibits certain discriminations in price or in promotional assistance.
- *The Federal Trade Commission Act* prohibits unfair methods of competition and unfair or deceptive acts or practices.

Within the EU, the competition regulations are found in the Treaty on the Functioning of the European Union along with the respective Member State's national competition laws. Abuse of a dominant market position is prohibited, as are agreements that prevent, restrict or distort competition.

Other countries, such as Canada and a growing number of countries in Africa, South America and Asia, also have competition or antitrust laws with which companies doing business in those parts of the world must comply. Certain number of the provisions within these regulations, such as price fixing, boycotts, and market divisions, are similarly strict as those of the U.S.

Policy

It is 3V Precision Machining, Inc.'s policy to comply fully and in good faith with the antitrust and competition laws of the countries in which 3V Precision Machining, Inc. and its affiliates conduct business. Although the Legal Department is responsible for deployment of this policy, all 3V Precision Machining, Inc. employees are individually accountable for complying with this policy. A violation of this policy by any employee may result in disciplinary action, up to and termination.

3V Precision Machining, Inc. employees shall promptly report any inquiries or investigations of antitrust or competition matters involving to the Legal Department. 3V Precision Machining, Inc. shall cooperate with all domestic and international enforcement agencies investigating alleged violations. All responses to inquiries and investigations shall be coordinated through and supervised by 3V Precision Machining, Inc.'s Legal Department.

Since the practices described herein do not encompass every type of practice that has been held to constitute an illegal restraint of trade, any proposed practice that appears to have an unreasonable effect on competition shall be brought to the attention of the Legal Department to ensure compliance with the law.

Relations with Competitors

The following non-competitive practices are strictly prohibited by 3V Precision Machining, Inc. either because they are *per se* unlawful under applicable law or because they may present a significant risk of violation of the law:

- *Price-fixing*: agreements between competitors to fix or adhere to prices or to terms or conditions of sale of products or services sold to or purchased from third parties
- *Exchange of Prices*: the exchange of information between competitors relating to prices or to terms or conditions of sale to any third party
- *Agreements Not to Compete*: rigged bids; agreements to allocate, divide, or assign customers, markets, or territories
- *Boycotts*: joint refusals to deal with third parties

In addition to these practices, all agreements between competitors that unreasonably restrain competition in any market are unlawful and are prohibited.

Training

Trade associations are a frequent source of antitrust violations. Accordingly, 3V Precision Machining, Inc. business development and other key employees shall receive routine training and guidance regarding membership and participation in trade association meetings.

Relations with Customers

3V Precision Machining, Inc. employees may not engage in the following activities without the prior approval from 3V Precision Machining, Inc.'s Legal Department:

- *Resale Price Maintenance*: an agreement with a customer to fix the minimum price at which they or other customers will re-sell 3V Precision Machining, Inc. products
- *Tying Arrangement*: an agreement by a party to sell one product or service only on condition that the buyer also purchase a different product or service from the seller
- *Reciprocity*: an agreement by one party under which it will buy from another party only if that other party will buy from it
- *Territorial and Customer Restrictions*: a restriction upon the territory in which, or customers to which, a customer may resell a product
- *Exclusive Dealing Arrangement*: an agreement by a customer to deal exclusively with 3V Precision Machining, Inc. or an agreement by 3V Precision Machining, Inc. to deal exclusively with one customer

A 3V Precision Machining, Inc. generally has the right to refuse to deal with or terminate any customer. However, the termination of a customer because it engaged in price discounting or failed to comply with an unlawful restriction or as the result of an understanding with another customer may present a serious antitrust issue. Accordingly, 3V Precision Machining, Inc. employees shall seek legal advice from the Legal Department prior to terminating any customer relationship.

The Robinson-Patman Act prohibits discrimination in price and promotional allowances in the sale of commodities, with certain exceptions. Employees shall seek legal advice from the Legal Department on all issues of potential price discrimination.

Responsibilities

3V Precision Machining, Inc.'s Legal Department shall be responsible for developing and implementing a corporate-wide Antitrust compliance program, which shall include at a minimum, the promulgation and maintenance of corporate level antitrust policies, the establishment of training requirements, the development and implementation of any necessary assessment tools and review protocols, and the provision of legal advice, as required.

The Business Unit leadership, with the assistance of the Legal Department, shall establish, maintain, and execute to 3V Precision Machining, Inc. antitrust procedures, that deter, detect, and promptly resolve potential issues.

Drug Free Workplace Policy

Overview

The purpose of this policy is to establish 3V Precision Machining, Inc.'s position on alcohol and illegal or unauthorized drug/controlled substance abuse in the workplace and to clarify our responsibilities to comply with relevant legal requirements of government jurisdictions.

This policy applies to all employees of 3V Precision Machining, Inc. worldwide (except as provided below) – in accordance with country specific and local laws and regulations.

Components of this policy may be superseded by contractual requirements and applicable law in non-US jurisdictions for employees outside the United States.

Employees covered by collective bargaining agreements; union or Works Council agreements are governed by the relevant provisions of those agreements.

Key Terms

Drug-Free Workplace Act of 1988 – Requires U.S. government contractors to institute policies on illegal drugs that include employee notification, supervisory training, identification of individuals engaged in illegal drug activity, employee assistance programs, and appropriate sanctions for violations.

Illegal Drug – A substance whose use or possession is controlled by federal law but that is not being used or possessed under the supervision of a licensed health care professional. (Controlled substances are listed in Schedules I-V of 21 C.F.R. Part 1308.)

Use of Illegal Drugs or Alcohol – A confirmed positive test result for illegal drug/alcohol use per this policy. In addition, it means the misuse of legal drugs (prescription and possibly over the counter) where there is not a valid prescription from a physician for the lawful use of a drug or if an over-the-counter drug or substance is abused.

Policy

3V Precision Machining, Inc. is strongly committed to providing a safe and secure workplace for the benefit of our employees, their families and our customers.

Consequently, 3V Precision Machining, Inc. will take reasonable steps to ensure drug/alcohol abuse/misuse does not occur in accordance with Drug-Free Workplace Act of 1988 and Department of Defense (DoD) Drug-Free Workforce regulations, through the establishment of a Drug-Free Awareness program that consists of the following:

Drug Free Awareness Program

- A.** Promote the dangers of drug abuse in the workplace, including notification that it is unlawful to sell, manufacture, distribute, dispense, possess or use a controlled substance on 3V Precision Machining, Inc. premises.
- B.** Promote that it is 3V Precision Machining, Inc. policy to maintain a drug- free workplace.
- C.** Provide and promote the availability of 3V Precision Machining, Inc. drug counseling, rehabilitation and employee assistance programs (including self-referral programs).
- D.** Promote and develop procedures outlining the penalties, including those listed below, that will be imposed on employees for violation of 3V Precision Machining, Inc. drug-free workplace policy:
 - Any employee convicted during his or her employment with 3V Precision Machining, Inc. of the distribution or sale of illegal drugs on 3V Precision Machining, Inc. premises or the possession of such drugs with intent to distribute or sell on 3V Precision Machining, Inc. premises shall be immediately terminated from employment.
 - Any employee convicted during his or her employment with 3V Precision Machining, Inc. of a criminal drug possession or drug use offense, or any employee found to be possessing or using illegal drugs, shall be subject to disciplinary action, up to and including termination.

If employee is not terminated, employee is required to attend a drug counseling and rehabilitation program and shall not be permitted to perform work on a government contract until he or she has successfully completed the program.
- E.** Promote that as a condition of employment, each employee must agree to abide by the terms of the drug-free workplace policy, and notify his or her supervisor and Human Resources, of any criminal drug conviction for a violation occurring in the workplace no later than five days after such conviction or as described in the terms and conditions of established employment agreements.
- F.** Promote that 3V Precision Machining, Inc. may, at its discretion, require the inspection of personal property and vehicles brought onto 3V Precision Machining, Inc. premises by employees and visitors. The inspections may include briefcases, purses, bags, lunch boxes, desks, file cabinets, lockers and other personal effects and areas used by employees and visitors while on 3V Precision Machining, Inc. premises. Bargaining unit employees may request that a union representative be present for any inspection.

Refusal to permit 3V Precision Machining, Inc. inspections, may result in disciplinary action against an employee, including termination. If 3V Precision Machining, Inc. has reasonable grounds to suspect that an employee is violating this policy, 3V Precision Machining, Inc. may call in the appropriate law enforcement agency to perform the search.

- G.** Promote and develop procedures for a carefully controlled employee drug testing program, consistent with safety and security requirements, performed by qualified personnel or a third party, that employees may challenge the results. The two (2) types of testing, as permitted by the governing laws of the work location, are as follows:
1. “For cause” testing shall be conducted at 3V Precision Machining, Inc.’s discretion when there is a reasonable suspicion that an employee is using or possessing illegal drugs on 3V Precision Machining, Inc. premises. The circumstances giving rise to reasonable suspicion of illegal drug use or possession may include, but are not limited to the following:
 - When an employee is observed possessing or using illegal drugs or alcohol on 3V Precision Machining, Inc. premises (alcohol consumption may be permitted in conjunction with certain 3V Precision Machining, Inc.-sponsored social events.)
 - When an employee exhibits observably impaired performance, or erratic or unusual behavior that appears to be the result of illegal drug use or alcohol abuse.
 - When an employee is involved in a reportable accident involving any bodily injury or any economic loss to 3V Precision Machining, Inc., or when an employee is involved in a reportable safety-related incident.
 - When 3V Precision Machining, Inc. receives information concerning illegal drug activity that is either provided by reliable and credible source(s) or is independently corroborated.
 2. Certain employees may be asked by 3V Precision Machining, Inc. to undergo random drug testing following the relevant laws pertaining to testing procedures. Employees who may be covered by the random drug testing policy are those who have had a positive test result under previous 3V Precision Machining, Inc. drug screening, employees returning to work following completion of a drug assistance or rehabilitation program, and employees in safety sensitive positions performing work on a covered government contract. “Safety Sensitive” positions are those that involve access to classified information, or that involve significant public or employee safety, health, or security issues, or significant trust or confidence.
- H.** Deploy supervisory training and develop procedures for the detection and handling of drug use and violations in the workplace, specifically to include that supervisors who receive notification of an employee workplace drug conviction are to immediately notify Legal department and Security department; and if appropriate the U. S. Government Contracting personnel who must be notified within 10 days.

Smoke Free Workplace Policy

Overview

This policy affirms 3V Precision Machining, Inc.’s commitment to provide a healthy work environment for all employees, contractors and visitors, to comply with local ordinances, State and Federal regulations, and to establish designated smoking areas.

This policy applies to all 3V Precision Machining, Inc. employees and visitors on 3V Precision Machining, Inc. property and is intended to provide minimum standards. Nothing herein is intended to violate contractual obligations in place.

Policy

Smoking, which includes the use of tobacco products, e-cigarettes, and any other inhalant producing smoke or vapor, is strictly prohibited in all 3V Precision Machining, Inc. owned or occupied facilities, 3V Precision Machining, Inc. sponsored meetings and activities, and in 3V Precision Machining, Inc. vehicles.

Smoking is limited to those outdoor areas specifically designated as “Smoking Areas.” Employees are responsible for directing their visitors to the approved smoking areas to smoke.

Smoking is only authorized during approved applicable break periods, during meal periods, and before and after the normal work schedule. No additional breaks are allowed for employees who smoke. Ash cans shall be positioned at designated smoking areas and certain access points for employees to properly dispose of smoking materials.

Information about smoking cessation and the health hazards of smoking are available to all employees from the Human Resources Department.

Employees may be subject to disciplinary actions, up to and including termination, and visitors and contractors may be asked to leave 3V Precision Machining, Inc. property for failure to comply with this policy.

U.S. Equal Employment Opportunity Policy

Overview

3V Precision Machining, Inc. values its highly talented and diverse workforce as a strategic advantage and is committed to providing equal opportunity in employment for all people.

This policy applies to all U.S. job applicants and employees of 3V Precision Machining, Inc.

Policy

3V Precision Machining, Inc. is committed to providing Equal Opportunity in Employment to all applicants and employees regardless of race, color, religion, sex, age, national origin, military status, veteran status, handicap, physical or mental disability, sexual orientation, gender identity, genetic information or any other characteristic protected by law.

This commitment must be followed in all aspects of employment and personnel practices including but not limited to: recruitment, hiring, placement, performance evaluation, upgrading or promotion, demotion, transfer, compensation, benefits, layoff and recall, training and development, social and recreational programs and application of all 3V Precision Machining, Inc. policies, procedures, and benefits.

[Note: The following paragraph only applies to companies that are federal contractors or subcontractors with 50 employees and \$50,000 in government contracts.]

3V Precision Machining, Inc. has a written Affirmative Action Plan (“AAP”), developed in accordance with the provisions of U.S. federal law, to support and implement the principles of equal employment and to promote the employment and advancement of persons specifically identified by statute and regulation including minorities, women, qualified disabled persons and veterans.

Responsibilities

All employees, managers, and supervisors are responsible for actively supporting 3V Precision Machining, Inc.’s commitment to Equal Employment by performing their duties and conducting their behavior in a non-discriminatory manner. Managers and supervisors are responsible for taking appropriate actions to prevent violations of this policy and to maintain a work environment that is free of unlawful discriminatory activities. All employees are responsible for reporting any conduct that might constitute discrimination or retaliation to their supervisor, their HR point of contact or Ethics and Compliance contact.

Retaliation

Retaliation of any kind against employees for reporting harassment and/or discrimination or assist in investigating such complaints is prohibited.

Violations

Violations of this policy will not be tolerated. 3V Precision Machining, Inc. will promptly investigate every issue that is brought to its attention in this area and will take appropriate disciplinary action, up to and including termination of employment.

Non-Harassment Policy

Overview

3V Precision Machining, Inc. is committed to maintaining an environment that is free of all forms of harassment, disruptive behavior and abuse and in which all individuals are treated with dignity and respect. This policy applies to all employees of 3V Precision Machining, Inc.

Key Terms

Harassment - refers to verbal, physical, written, or visual conduct or behavior which harasses, disrupts, or interferes with another's work performance, or creates an intimidating, hostile or offensive work environment.

Sexual Harassment - refers to unwelcome behavior of a sexual nature when (i) an employment decision affecting the employee is based upon the employee's acceptance or rejection of such conduct, or (ii) such conduct has the purpose or effect of substantially interfering with an individual's work performance such that it creates an intimidating, hostile, or offensive working environment.

Policy

This policy promotes a safe, respectful, and productive workplace by defining prohibited behavior and responsibilities and establishing processes to prevent, report, investigate and resolve allegations of harassment.

Non-Harassment

3V Precision Machining, Inc. does not tolerate any acts of Harassment by or against its employees or Third-Parties. Employees may not engage in or display any form of Harassment.

It is important to remember that behavior which one individual considers innocent or harmless may be regarded as Harassment by another person.

Although it is not possible to list every type of behavior that can be considered Harassment in violation of this policy, Harassment includes, but is not limited to:

- intimidating, threatening or hostile behavior;
- comments, gestures or actions regarding violent events or behavior;
- shoving, punching, groping, tripping, pinching, stalking, pushing, damaging another's personal tools or possessions;
- demeaning or offensive slurs, profanity and foul language;
- displays of demeaning reading materials or pictures, including electronic materials, drawings, or objects;
- inappropriate email communications;
- jokes or negative comments that demean or disparage others;
- spreading malicious rumors or comments;
- acts of vandalism, arson, or sabotage;
- behavior that reflects a lack of respect for an individual's race, age, gender, ethnicity, color, ancestry, nationality, marital status, mental or physical disability, sexual orientation or military status.

No Sexual Harassment

Sexual harassment violates the law and is expressly prohibited under this policy and 3V Precision Machining, Inc.'s Code of Conduct. 3V Precision Machining, Inc. does not tolerate any acts of Sexual Harassment by or against its employees or Third-Parties.

Sexual harassment includes conduct by members of the same gender, and is not limited to:

- unwelcome sexual advances or requests for sexual favors;
- promising favorable treatment or threatening unfavorable treatment based on the employee's response to behavior of a sexual nature;
- sending, displaying, forwarding, or posting sexually suggestive pictures, videos, photos, drawings, images, letters, notes, text messages or email;
- making inquiries about an employee's sexual behavior;
- unwelcome touching that makes an employee feel uncomfortable such as massages, hugging, kissing or intentional brushing against another's body;
- repeated requests for dates or contact outside the workplace;
- behavior, remarks, jokes, gestures or innuendos of a sexual nature or that intimidate, ridicule, demean or belittle a person on the basis of their gender (regardless of whether the remarks are sexually provocative or suggestive of sexual acts);
- using sexual behavior to create an intimidating, hostile or offensive working environment.

Violations of this Policy

Anyone violating this policy may be subjected to being removed from the premises and are subject to disciplinary measures, up to and including termination. Third-Party offenders may suffer the suspension or termination of their business relationship with 3V Precision Machining, Inc.

Violations of this policy may also result in personal legal and/or financial liability.

Reporting Harassment

Employees and Third Parties are requested to promptly report any witnessed potential Harassment behavior to the attention of management or those referenced in the Code of Conduct in order for 3V Precision Machining, Inc. to take appropriate action.

Management Responsibilities

It is the responsibility of persons in supervisory or management positions to maintain a workplace free from any form of Harassment including Sexual Harassment and to bring this policy to the attention of all employees, to verify that all employment actions are administered in accordance with this policy, and to bring to the attention of their supervisor or manager, their Human Resources representative, an ethics and compliance representative, or a legal representative any violation of this policy of which they become aware.

Workplace Violence Prevention Policy

Overview

3V Precision Machining, Inc. is committed to providing a safe work environment for all employees and individuals who conduct business with our employees on 3V Precision Machining, Inc. property. The purpose of this policy is to define the prohibited conduct by employees and to establish a process for reporting and responding to incidents or threats of violence.

Key Terms

Workplace Violence - Behavior involving the threat or infliction of physical or verbal harm to persons or property, including statements, expressions of intent, intimidation or conduct against persons or property that is sufficiently severe, offensive, or intimidating enough to make a reasonable individual fear for his/her personal safety or the safety of family, friends, or property.

Policy

3V Precision Machining, Inc. strictly prohibits employees from engaging in workplace violence, while on 3V Precision Machining, Inc. property, conducting 3V Precision Machining, Inc. business on travel, attending a 3V Precision Machining, Inc. sponsored event or function, or representing 3V Precision Machining, Inc. on non-3V Precision Machining, Inc. premises. Furthermore, employees and Third-Parties may not bring unauthorized weapons onto 3V Precision Machining, Inc. premises.

All employees who violate this policy are subject to discipline, up to and including termination. Employees who knowingly make false complaints of workplace violence will be subject to disciplinary action up to and including termination.

Examples of Prohibited Conduct

Although impossible to list every type of behavior that is prohibited under this policy, examples of prohibited conduct include, but are not limited to, the following:

- Intentional, unwelcome physical contact or attempts at such contact including, but not limited to, hitting, shoving, fighting, biting, kicking, pushing, or throwing an object at an individual;
- Intentionally causing, or attempting to cause, physical injury to another person;
- Acts of intimidation including threatening to harm an individual or his/her family, friends, associates, or their property;
- The intentional destruction or threat of destruction of 3V Precision Machining, Inc. property or property owned by an individual held on 3V Precision Machining, Inc. premises;
- Making threatening statements verbally or through written or electronic communications including telephone calls, emails, letters, website materials, inappropriate gifts, or graffiti;

- Engaging in behavior that creates reasonable fear of a person’s safety, including stalking;
- Unauthorized possession or inappropriate use of firearms, weapons, or any other dangerous devices on our property.

Reporting Responsibilities

3V Precision Machining, Inc. employees are required to notify a member of 3V Precision Machining, Inc. Management, Security, or Human Resources immediately of any incidents of Workplace Violence which they have witnessed, suffered, or has received credible information about, regardless of the position held by the individual engaging in the violent or threatening behavior.

3V Precision Machining, Inc. encourages all employees to proactively report suspicious and erratic behavior before violence occurs in the workplace. Employees or managers should always call local law enforcement if, in his or her good judgment, such a call is appropriate.

Contracting with the U.S. Government Policy

Overview

The purpose of this policy is to provide each 3V Precision Machining, Inc. employee with general guidance for compliance with the laws and regulations specific to contracting with the U.S. Government. It is not intended to cover each and every specific situation or topic. Consult with 3V Precision Machining, Inc. legal departments for further information and guidance.

Policy

3V Precision Machining, Inc. employees involved in doing business with the U.S. Government are expected to perform their jobs with honesty and integrity, to comply with 3V Precision Machining, Inc.’s Code of Conduct, to comply with all applicable U.S. Government contracting laws and regulations, and to comply with all applicable U.S. Government contract terms and provisions.

Disregard of these principles and expectations can expose 3V Precision Machining, Inc. to price reductions, the withholding of payments, civil and criminal fines and penalties, contract termination, suspension and debarment, and will be grounds for appropriate disciplinary action, including termination of employment. Individuals found guilty of violations of certain laws and regulations referenced in this policy may also be subject to fines and imprisonment.

Recording, Allocating and Charging Costs

It is the responsibility of all 3V Precision Machining, Inc. employees who charge time to a U.S. Government contract to comply with the requirements of 3V Precision Machining, Inc.’s timekeeping system.

All employees must be aware of the rules that govern the recording, allocating and charging of costs to the U.S. Government. Employees must also ensure that no improper or false entries are made to accounting records or other 3V Precision Machining, Inc. records, and that no improper amounts are charged to U.S. Government contracts.

Each employee is responsible for properly recording, allocating, and charging his / her own time and attendance data. No supervisor shall approve an employee's labor record knowing it contains false information.

Preparing Proposals and Negotiating Contracts

Employees involved in the preparation or submission of proposals must ensure that all proposals are in compliance with applicable cost accounting standards and the Federal Acquisition Regulation (FAR) cost principles. Only reasonable, allocable and allowable costs may be charged to negotiated contracts or included in pricing proposals (i.e., forward pricing rate agreements, final overhead submissions, progress payment requests, etc.).

Employees involved in the negotiation of contracts or subcontracts must ensure that all cost and pricing data are disclosed as of the date of agreement or "handshake" on price, and all data are current, accurate and complete as required by law.

In addition, employees involved in the preparation or submission of proposals must ensure that all contractual, regulatory, and statutory requirements are complied with, or will be complied with, before contract award.

Dealings with Subcontractors

Where 3V Precision Machining, Inc. is a prime contractor on a U.S. Government contract, 3V Precision Machining, Inc. must ensure that all subcontracts are awarded to qualified subcontractors in accordance with both the terms of the prime contract and 3V Precision Machining, Inc.'s purchasing system. In addition, 3V Precision Machining, Inc. must incorporate applicable U.S. Government flow-down provisions into all such subcontracts.

Design, Manufacture and Testing of Products

Under no circumstances may any 3V Precision Machining, Inc. employee deviate from the requirements of a U.S. Government contract without customer authorization from the appropriate contracting officer. All tests required to be performed under a contract must be performed accurately and completely and must be accompanied by all required certifications. Falsification of inspection or test results or failure to accomplish required inspections or tests is strictly forbidden.

Entertainment, Gifts and Gratuities

Strict rules apply to the offering and acceptance of entertainment, gifts, gratuities and other business courtesies by government employees, prime contractors, and subcontractors. All 3V

Precision Machining, Inc. employees must seek guidance from the Legal Department prior to offering or accepting any gift, regardless of value, to or from a U.S. Government employee, or a prime contractor or subcontractor under a contract in which 3V Precision Machining, Inc. is itself a prime contractor or subcontractor.

Prohibition on Kickbacks

3V Precision Machining, Inc. employees are prohibited from providing, attempting or offering to provide, and soliciting, accepting or attempting to accept, any kickback. Kickbacks include money, fees, commissions, credits, rebates, gifts, gratuities or things of value or compensation of any kind which is provided, directly or indirectly, for the purpose of improperly obtaining or rewarding favorable treatment in connection with a U.S. Government prime contract or subcontract.

Procurement Integrity and Receipt and Use of Competitive Information

All 3V Precision Machining, Inc. employees who work with any aspect of U.S. Government contracting are expected to be knowledgeable about the specific laws and regulations governing federal procurements. All personnel must also comply with the laws that protect third-party confidential or proprietary information.

3V Precision Machining, Inc. personnel receiving third-party proprietary / confidential information that is not pursuant to a confidentiality, non-disclosure or similar agreement must discontinue reading such information as soon as it becomes apparent to the recipient that he or she is not the intended recipient or is not authorized to have such information. In such a case, the recipient must immediately contact the Legal Department. Such a recipient must not forward such information because forwarding such information to anyone other than a Legal Department representative may result in compounding the "information contamination," if it is determined that 3V Precision Machining, Inc. is not properly in receipt of such information. If the information is in email form, the recipient must not delete the email from his or her computer until advised to do so by the Legal Department.

3V Precision Machining, Inc. employees must not ask former employees of competitors to provide any confidential or proprietary information. This includes any request for oral or written information. Former or current 3V Precision Machining, Inc. employees are obligated to continue to protect the confidential information of their former and current employer, respectively. 3V Precision Machining, Inc. policy prohibits requesting third-party confidential information from current employees of a competitor without an executed confidentiality, non-disclosure or similar written agreement executed by authorized representatives of 3V Precision Machining, Inc. and the competitor / supplier 3V Precision Machining, Inc.

Additionally, to avoid the appearance of a conflict of interest, legal approval is required prior to appointing a former employee of a competitor to a 3V Precision Machining, Inc. proposal team for a competition that is the same, or similar to, one the employee worked on as an employee of a

competitor. It is imperative that 3V Precision Machining, Inc. personnel avoid the appearance of impropriety.

The Economic Espionage Act is a criminal statute prohibiting theft of trade secrets. Any 3V Precision Machining, Inc. employee who is provided with information he believes may have been taken in violation of the Economic Espionage Act must not read any such information. As soon as such person suspects that he is not authorized to have such information, he must immediately contact the Legal Department for further instruction. Recipients must not forward or share such information with any person other than a member of the Legal Department.

Reporting of Violations

All employees are responsible for reporting suspected violations of 3V Precision Machining, Inc. policy, law or regulations to their supervisor, to a member of the Legal Department, to 3V Precision Machining, Inc.'s Ethics and Compliance Officer, or to 3V Precision Machining, Inc.'s "Hotline."

Human Trafficking Prevention Policy

Overview

The purpose of this policy is to establish 3V Precision Machining, Inc.'s commitment to conduct business in a manner that complies with internationally-proclaimed human rights provisions and to do business with suppliers and other third parties who conduct business in a similar manner. This policy applies to all 3V Precision Machining, Inc.'s employees and operations globally.

Key Terms

The terms below are defined in the Federal Acquisition Regulation (FAR), Subpart 22.17 – Combating Trafficking in Persons:

Commercial Sex Act - any sex act for which anything of value is given to or received by any person.

Debt Bondage - the status or condition of a debtor arising from a pledge by the debtor of his/her personal services or of those of a person under his/her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.

Forced Labor - knowingly providing or obtaining the labor or services of a person (1) by threats of serious harm to, or physical restraint against, that person or another person; (2) by means of any scheme, plan or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or (3) by means of the abuse or threatened abuse of law or the legal process.

Involuntary Servitude - includes a condition of servitude induced by means of (1) any scheme, plan or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or (2) the abuse or threatened abuse of the legal process.

Sex Trafficking - the recruitment, harboring, transportation, provision or obtaining of a person for the purpose of a commercial sex act.

Severe forms of trafficking in persons - means (1) sex trafficking in which a commercial sex act is induced by force, fraud or coercion, or in which the person induced to perform such act has not attained 18 years of age; or (2) the recruitment, harboring, transportation, provision or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

Policy

It is 3V Precision Machining, Inc.'s policy to demonstrate through its actions that human rights violations are avoidable and unacceptable. 3V Precision Machining, Inc. will not willingly or knowingly assist in any violation of human rights or benefit from any human rights violation committed by another party. Human rights violations include, but are not limited to, the direct or indirect procurement or use of commercial sex acts, forced labor, child labor, debt bondage, involuntary servitude and sex trafficking.

3V Precision Machining, Inc. is committed to the freedom of association and the recognition of the right to collective bargaining provided by law and to complying with all applicable wage and hour laws and providing safe and secure working conditions for employees and others working on 3V Precision Machining, Inc.'s behalf.

Reporting & Resolution

All persons - including 3V Precision Machining, Inc. employees, contractors, contingent workers, and suppliers - are expected to report any actual or suspected human rights violation to any of the resources listed in the Code of Conduct or the Global Human Trafficking Hotline (1-844-888-FREE or help@befree.org).

Individuals who report suspected human rights violations can do so confidentially and/or anonymously and will be protected from retaliation as outlined in 3V Precision Machining, Inc.'s Code of Conduct and Non-Retaliation policy.

Segment Programs

The business will develop procedures implementing this policy, compliant with all applicable regulations. When purchase orders and subcontracts include over \$500,000 of performance outside

the U.S., comprehensive compliance plans to combat human trafficking will be developed and maintained. These plans will include, at minimum, the following elements: procedures to implement this policy, support of efforts designed to combat human trafficking behavior, promotion of the Global Human Trafficking Hotline, and monitoring of 3V Precision Machining, Inc. and subcontractor compliance.

Procurement Policy

Overview

The purpose of policy is to assure goods and services are procured efficiently, effectively, at the most favorable prices available to 3V Precision Machining, Inc.; to promote full and open competition and the utilization of small businesses where practical; and to assure safeguards for maintaining a system of compliance and integrity. This policy applies to all 3V Precision Machining, Inc. employees and its applicable subsidiaries and affiliates globally, and serves as the minimum standard for procurement operations.

Policy

This policy is intended to provide consistent methods to achieve objectives, clarify expectations, reinforce values and behaviors, and mitigate risk to 3V Precision Machining, Inc. Procurement function is required to take the appropriate steps to meet these requirements and shall ensure that supplier selection procedures fully support this policy.

- A. Value:** Obtain the best value for all goods and services purchased while maintaining the highest ethical standards in dealing with suppliers. Value is determined by the balancing of technical and operational requirements, price, quality, service, and delivery considerations to provide the best overall benefit to 3V Precision Machining, Inc.
- B. Compliance:** All procurement transactions must be conducted in compliance with applicable customer requirements such as International Standards Organization (ISO), laws and regulations such as Federal Acquisition Regulation (FAR) and International Traffic in Arms Regulation (ITAR), and 3V Precision Machining, Inc. policies and procedures.

Requirements may include, but are not limited to, the following:

- Use full and open competition when possible
- Select small businesses when possible
- Protect customer and 3V Precision Machining, Inc. intellectual property, including non-contractual or pre-contractual contact with suppliers involving the transfer of proprietary design/process information or ITAR-controlled technical data
- Flow down contractual requirements

- Adhere to Contractors' Purchasing System Review (CPSR) as defined in FAR Subpart 44.3

C. Supplier Utilization: When possible, every effort should be made to procure materials or services from suppliers designated as "Strategic" or "Preferred". All new suppliers and any existing suppliers, where mandated by government or regulatory requirements, must meet minimum requirements for qualification including the execution of a Non-Disclosure Agreement (NDA) when appropriate, and an acknowledgement and acceptance of 3V Precision Machining, Inc.'s Supplier Code of Conduct.

When required or when procurement is able to, 3V Precision Machining, Inc. must utilize Small, Small Disadvantaged, Women-Owned, HUBZone, Veteran-Owned and Service-Disabled Veteran-Owned businesses ("Small Businesses").

D. Authority: The authority to commit 3V Precision Machining, Inc. to establish legally binding procurement transactions resides solely with procurement associates, with the exception of transactions of Procurement Card transactions, Expense Reimbursements, Emergency Orders required for conducting critical business operations, and non-PO authorized transactions. All procurement transactions must be approved via signature in accordance with Delegation of Authority schedule which authorizes the specific financial authority thresholds for specific 3V Precision Machining, Inc. employees.

E. Methods: Any requests for purchases of goods or services must follow the process appropriate to the type of good or service being bought based on spend authority and functional accountability, and be promptly transacted to ensure liabilities or expenses are visible to 3V Precision Machining, Inc. POs, COs, Procurement Cards, Supplier Schedule Order (SSO) Agreements, Material Requirements Plan (MRP) or repetitively purchased Blanket Order Agreements (BOA) or Blanket Purchase Orders (BPO), Subcontracts, Master Service Agreements and Consulting Agreements are acceptable methods for the acquisition of materials and/or services.

Procurement documents must clearly and completely describe the ordered products and services and display the proper legal entity. Requestors are responsible to provide the following on purchase requisitions: the appropriate commodity codes consistent with approved coding structure (where established), accounting codes, and allocations where necessary. Procurement associates should review purchase requisitions to ensure proper coding is utilized.

Standard PO terms establish the guidelines for when supplier acknowledgement of a PO is required. A confirmation of PO receipt must be obtained prior to shipment, or service performance, where mandated by government or regulatory requirements. Where discrepancies on terms arise, they must be resolved with the supplier prior to execution of the PO.

BOAs and BPOs should have a defined Term, and a realistic Not-To-Exceed (NTE) dollar amount. An annual fiscal review of the open, unused portions of approved blanket authorizations should be conducted to validate need and available funding as well as to mitigate potential risk.

- F. Pay Terms:** 3V Precision Machining, Inc. standard pay terms policy is Net 45, except for cost reimbursement and fixed price contracts with cost-based progress payment.
- G. Contract Development:** Typically, for large complex purchases or purchases that include nonstandard terms and conditions or otherwise expose 3V Precision Machining, Inc. to potential risks, procurement associates will utilize formal contract agreements. The requestor is responsible for obtaining input from relevant stakeholders as necessary, which may include Finance, Tax, Human Resources, Risk Management, Legal and others that have an interest in the contractual commitment.
- H. Record Retention:** All procurement related documents shall adhere to the Record Retention policy and schedule.

Mandatory Disclosure Policy

Overview

This policy is to establish the process by which 3V Precision Machining, Inc. will comply with the Mandatory Disclosure requirements established by the Federal Acquisition Regulation (FAR).

Key Terms

Principals – key 3V Precision Machining, Inc. officer, director, owner, partner, or a person having primary management or supervisory responsibilities within a business entity

Covered Contract – A U.S. Government contract (or subcontract under a U.S. Government contract) awarded to 3V Precision Machining, Inc. or any of its subsidiaries exceeding \$5 million and 120 days' performance period.

Possible Disclosable Violation – as indicated in FAR 9.406.2(b)(1)(vi), FAR 9.407-2(a)(8) or FAR 52.203-13(b)(3)(i), an alleged, actual or suspected incident, occurrence or event that may give rise to a mandatory disclosure that involve credible evidence of:

- a. Violations of Federal criminal law involving fraud, conflict of interest, bribery or gratuity violations found in Title 18 of the U.S. Code
- b. Violations of the Civil False Claims Act
- c. A significant overpayment (other than those payments as defined in FAR Part 32.001)

Policy

All Harris employees, consultants and agents are expected to conduct all 3V Precision Machining, Inc. business in full compliance with the Harris Code of Conduct.

Harris Principals – Internal Disclosure

All 3V Precision Machining, Inc. principals shall be trained with respect to this policy and compliance with the FAR Mandatory Disclosure Requirements.

Upon becoming aware of a possible disclosable violation, 3V Precision Machining, Inc. Principals are responsible for:

- a. Conducting an investigation to determine whether credible evidence of a violation exists
- b. Making a recommendation to the Legal Department as to whether the possible disclosable violation should or should not be disclosed consistent with the FAR and this policy

Mandatory Disclosure

The Legal Department shall consult with subject matter experts or others as necessary in order to determine if a disclosure to the government should be made.

Before any disclosure is made under this policy, it shall first be marked or identified as 3V Precision Machining, Inc. Proprietary Information.

Subcontract Flow Down Requirements

All subcontracts that fall under a covered contract shall include language that requires subcontractors to comply with the FAR mandatory disclosure requirements as indicated under FAR 9.406.2(b)(1)(vi), FAR 9.407-2(a)(8) and FAR 52.203-13(b)(3)(i).

Confidential Information Policy

Overview

Protecting Confidential information is a business, ethical, and legal requirement. Unauthorized disclosure or misuse of Confidential information can result in lost business, law suits or even bankruptcy of the business.

Consequently, this policy is intended to identify information that is considered Confidential information and provide guidelines and outline employee responsibilities for the protection and use of Confidential information.

Key Terms

Confidential Information – Information employees have access to, by performing their job-related duties, which is not in the public domain and is considered Confidential to 3V Precision Machining, Inc.

This includes, but is not limited to:

- Information about customers or business dealings with 3V Precision Machining, Inc.
- Information about 3V Precision Machining, Inc.'s products, services, or affairs which could potentially damage 3V Precision Machining, Inc., particularly information not known to 3V Precision Machining, Inc.'s competitors
- Information about any employee or officer of 3V Precision Machining, Inc., such as employee's personally identifiable information, work history, criminal background check information, salary and salary grade, benefits, length of service, performance, and discipline
- Information which falls under the data protection rules and regulations of those countries the information is located in
- Information which is labeled as classified, private, or confidential
- Technical details, specifications, or documents relating to any of 3V Precision Machining, Inc.'s products, services, or proposals
- Information relating to 3V Precision Machining, Inc.'s plans or strategic direction, finances or performance, acquisitions, procurements, or market research undertaken by 3V Precision Machining, Inc.
- Information which relates to any internal investigation, pre/non-public litigation, and administrative agency charge, audit and inquiry information
- Accident or personally identifiable medical information, and "Protected Health Information" under the Health Insurance Portability and Accountability Act (HIPAA)

Misuse – Confidential information can be misused intentionally (acts and/or omissions), or through negligence or inadvertence, and includes but is not limited to:

- Accessing information not directly germane or relevant to the employee's specifically assigned tasks
- Disclosing system log-on information or access combinations to anyone
- Disclosing, discussing and/or providing Confidential information to any individual not authorized to view or access that data, including but not limited to third parties, consultants, vendors and other employees
- Reckless, careless, negligent, or improper handling, storage or disposal of Confidential information, including electronically stored data, printed documents, and reports in any media format
- Deleting, adding, or altering information without authorization
- Generating and/or disseminating false or misleading information
- Using information viewed or retrieved from the systems for personal benefit or any other unauthorized or unlawful use, including unauthorized removal

Policy

All 3V Precision Machining, Inc. employees and those acting on behalf of 3V Precision Machining, Inc., who have access to Confidential information must not misuse, disclose, or disseminate it to any individual, including other employees or external parties or organizations that are not authorized to have access to that information. Any disclosure of Confidential information to any individual, third party or organizations outside of 3V Precision Machining, Inc., except proper requests pursuant to legal or regulatory actions, must be approved by the applicable authority.

Employee misuse or unauthorized disclosure of Confidential information, and/or the systems in which the information is stored, whether intentional or inadvertent, is a serious breach of job responsibilities. The criticality and nature of the infraction will determine the level of discipline up to and including termination of employment.

All new employees, upon hire or immediately following an acquisition, must sign the Employee Agreement indicating their awareness of the responsibility to protect 3V Precision Machining, Inc. Confidential information.

Responsibilities

3V Precision Machining, Inc.'s Director of Human Resources is responsible for the implementation of this policy within 3V Precision Machining, Inc., for interpreting the policy content, and coordinating with the Legal Department, as necessary.

Managers are responsible for communicating these responsibilities herein to their respective employees.

Employees responsible for, or who have access to, Confidential information are expected to know and understand associated security requirements, and to take measures to protect the information, regardless of the data storage medium being used, e.g., printed media, data/voice networks, hard/flash drives, memory sticks, CDs, etc. Employees must report violations of this policy to their supervisor, department manager, appropriate Human Resources, Legal or the Helpline.

Information Technology Acceptable Use Policy

Overview

This policy defines the appropriate use of 3V Precision Machining, Inc. Information Technology (IT) resources by all 3V Precision Machining, Inc. employees.

Key Terms

Information Technology (IT) Resources - Includes but is not limited to physical and electronic resources used to process, transmit and store 3V Precision Machining, Inc. data that involves files, email, computers, mobile/portable devices, removable media, networks, internet connections, applications/software, telephony equipment and the like.

User - 3V Precision Machining, Inc. employee or third-party working on the behalf of 3V Precision Machining, Inc. that is authorized by contract or agreement to utilize 3V Precision Machining, Inc. IT resources.

Policy

All users are expected to use IT Resources consistent with 3V Precision Machining, Inc. policies, and applicable laws and regulations and for authorized business purposes. Users should have no expectation of privacy relating to their use of 3V Precision Machining, Inc. IT Resources, specifically including electronic mail and internet usage.

3V Precision Machining, Inc. reserves the right to audit any and all user's use of IT Resources to ensure that it is being used appropriately and for legitimate business purposes. 3V Precision Machining, Inc. users who violate any part of this policy or related laws and regulations are subject to disciplinary action up to and including termination.

In addition, 3V Precision Machining, Inc. reserves the right to immediately terminate, for cause, any contract or business relationship with third parties who violate any part of this policy.

User ID/Password Responsibilities

User Identification (ID): Users are responsible for all activity performed under their personal user-IDs. Users must not allow others to perform any activity with their user-IDs and users are forbidden from performing any activity with IDs belonging to other users.

User Password: Users must not share or disclose their passwords with anyone including IT, must never write down passwords to be stored in an unprotected environment (i.e. on a Post-it™ note), or programmed into function keys or otherwise stored or saved on, or near, computers. Users must select passwords that avoid using common dictionary words, portion of names of user or their family members, and be at least twelve (12) characters in length including at least three (3) of the following characteristics:

- An alphabetical character
- An upper case letter
- A numeric character
- A special character (such as #, !, %, etc.)

Appropriate Use of Computer Hardware and Portable Devices

Users may only use 3V Precision Machining, Inc. approved computer hardware or portable devices to store or access 3V Precision Machining, Inc. proprietary and regulated information. Users may only store information on non-3V Precision Machining, Inc. owned/leased hardware (such as home computer or personal cell phone) if approved by 3V Precision Machining, Inc.'s IT Department. Unless specifically authorized to do so by 3V Precision Machining, Inc. IT Department, users are strictly prohibited from the following activities on 3V Precision Machining, Inc. IT Resources:

- Attempting to circumvent user authentication or share resources such as folders and printers
- Downloading, installing and/or using unauthorized hardware or software

- Disabling, modifying or attempting to disable security, anti-virus, or patch settings
- Performing any activity that violates local, state or federal law or is in violation of any 3V Precision Machining, Inc. contract or policy
- Excessive use of streaming video which could significantly degrade network performance

Approved Third Party Hardware

Use of third party (vendor/supplier/partner/customer) hardware to directly connect to 3V Precision Machining, Inc. IT resources must be approved by the IT Department. Reasonable security safeguards prior to connection to 3V Precision Machining, Inc.'s network are subject to the following control requirements:

- A 3V Precision Machining, Inc. Non-Disclosure Agreement must be in place with a third-party prior to that third-party connecting to the 3V Precision Machining, Inc. network
- A Third-Party Connection Agreement must also be executed prior to granting network access
- Computer workstations must have a firewall and anti-virus software installed and enabled, and the latest operating system security patches applied
- Mobile computing devices, such as laptops, must have whole disk or whole device encryption enabled, where technically feasible.

Portable Computing Devices

Export Compliance: Users must consult with the Trade Compliance Department prior to foreign travel for approval to take laptop and other portable devices. Users may not download or store information to the mobile device or use the device to print data that contains International Traffic in Arms Regulations (ITAR) controlled information or sensitive unclassified during the trip.

Physical Security: Users must protect portable devices from loss, theft, or non-authorized access by enabling the password lock when the device is not in possession or in use.

Encryption: Laptops or flash media must be configured with encryption.

Connecting to Non-3V Precision Machining, Inc. Networks: Users connecting to third party networks (airports, hotels or wireless cafes, home networks) must immediately use 3V Precision Machining, Inc.'s provided VPN client software to connect to the 3V Precision Machining, Inc. network.

Privileged Access Users

Users with elevated, root, administrative, supervisory, super user or other privileged access must:

- Provide certification of US Person status when access relates to ITAR information
- Safeguard their privileged access by promptly logging out of or "locking" IT resources when not in use

Wireless Access

Users must only use wireless devices and technologies that are approved by the IT Department.

Users may only connect to 3V Precision Machining, Inc. wireless networks with 3V Precision Machining, Inc. approved devices and must never connect to both 3V Precision Machining, Inc. wireless networks and a third-party wireless network simultaneously.

Users may not configure their wireless devices to function in “ad-hoc” or “peer-to-peer” mode or in a manner that could be used for network connection sharing.

Users wishing to connect to third party wireless networks (airports, hotels or wireless cafes, home networks, etc.) must immediately use their 3V Precision Machining, Inc. issued VPN client software.

Users who are in possession of computing or mobile devices supporting Bluetooth™ technologies must ensure that their devices remain in non-discoverable mode unless the device is pairing. When pairing devices, encryption and complex (difficult to guess) pins must be used.

Internet Usage

Incidental personal use of 3V Precision Machining, Inc. IT Resources to access the Internet is permissible, using an authorized network connection only, as long as it does not:

- Consume more than a trivial amount of resources
- Reduce user productivity
- Interfere with any business activity

The posting, uploading or sharing of any 3V Precision Machining, Inc. data or information (for all data classifications other than “Public”) must adhere to Social Media and Proprietary Information policies.

Performing any of the following activities are strictly prohibited while using 3V Precision Machining, Inc. IT Resources:

- Visiting sites that could be perceived as offensive, threatening, harassing, illegal, or unethical
- Visiting sites that involve gambling
- Sharing or downloading music or video files
- Conducting political activity, fundraising or lobbying without explicit permission from 3V Precision Machining, Inc.’s Legal Department

Electronic Mail (email) Usage

All users must use 3V Precision Machining, Inc.’s provided e-mail system for all 3V Precision Machining,

Inc. email transmissions, unless approved by 3V Precision Machining, Inc.'s IT Department.

E-mail messages are to be considered the same as formal, written 3V Precision Machining, Inc. memoranda. When composing e-mail messages, users are to use appropriate language in alignment with 3V Precision Machining, Inc. values and Code of Conduct.

The following email activities are strictly prohibited while using 3V Precision Machining, Inc. IT Resources:

- Engaging in any illegal, unethical, or improper activities
- Using threatening, defamatory, obscene, offensive, or harassing language
- Forwarding emails to non-3V Precision Machining, Inc. email accounts
- Misrepresenting, obscuring, suppressing, or replacing a user's identity on an electronic communication
- Soliciting political contributions or advocating for political candidates
- Using e-mail addresses for marketing purposes
- Using 3V Precision Machining, Inc. email accounts to post information on list services, websites, forums, chat rooms, blogs, social networks or other public Internet locations
- Sending or forwarding chain letters

Instant Messaging (IM) Usage

Instant Messaging (IM) solutions provided must be used for 3V Precision Machining, Inc. business purposes only. The following IM activities are strictly prohibited while using 3V Precision Machining, Inc. IT Resources:

- Using threatening, defamatory, obscene, offensive, or harassing language
- Transmitting highly sensitive, proprietary and/or regulated
- Transmitting content to be saved in accordance with retention policy
- Soliciting donations or to advocate for political candidates
- The downloading or use of unauthorized IM solutions

Removable Media Usage

Users must only use approved removable media (i.e. thumb drives) for the storage of 3V Precision Machining, Inc. data. Users must encrypt or password protect all removable media. Users must not remove media containing 3V Precision Machining, Inc. data from the facilities without authorization from their immediate supervisor.

Disposal and Returning of IT Resources

Users are required to dispose of IT resources (computers, laptops, cell phones, removable media) through the IT Department and may not be discarded, sold, auctioned, or donated.

Upon a user separating from 3V Precision Machining, Inc., the user's supervisor must coordinate with the HR and IT departments to ensure that:

- All 3V Precision Machining, Inc. IT resources ((computers, laptops, cell phones, removable media, badges, keycards, etc.) have been returned
- All access rights and security access codes have been removed or deactivated

Reporting Security Incidents

Users must immediately report to their supervisor, HR Department, or IT Department any suspected suspicious, unauthorized, or malicious activity that could affect 3V Precision Machining, Inc. IT Resources or the confidentiality, integrity or availability of 3V Precision Machining, Inc. customer or corporate data.

Industrial Security Program Policy

Overview

The purpose of this policy is to establish essential elements of 3V Precision Machining, Inc. Industrial Security Program. This policy applies to all 3V Precision Machining, Inc. locations and employees worldwide which have, or are eligible to access or possess, classified information pursuant to a Government agreement or contract.

Key Terms

Security key terms and definitions can be found in the [National Security Program Operating Manual \(NISPOM\)](#)

Policy

This policy encompasses all aspects of 3V Precision Machining, Inc. implementation and maintenance of the United States (U.S.) National Industrial Security Program (NISP) as promulgated by the NISPOM, Intelligence Community Directives (ICD) and other related laws, regulations or programs designed to protect classified or sensitive information as required by contract or agreement.

In order to provide support to Department of Defense contracts, 3V Precision Machining, Inc. must have a Facility Clearance Letter (FCL). 3V Precision Machining, Inc. must register for an FCL account through the Defense Security Service (DSS) online at: [e-FCL website](#).

For Intelligence Community contracts, facilities and systems must be accredited by the respective customer prior to anyone being cleared and before classified work occurs at a 3V Precision Machining, Inc. or Customer facility.

Personnel Security Reporting Requirements:

Cleared employees shall

- Report any change or event in his/her personal life that may have a bearing on clearance criteria (marriage, divorce, co-habitation with foreign national, etc.)
- Report all adverse information to their 3V Precision Machining, Inc. Security Department. Adverse information includes:
 - Criminal conduct to include arrest
 - Drug/Alcohol involvement
 - Security violations
 - Emotional, mental or personality disorders
 - Foreign influence or preference
 - Financial considerations, such as bankruptcy, tax liens or garnishments
- Report all foreign travel, both personal and business, to their 3V Precision Machining, Inc. Security Department at least 30 days prior to leaving the country.
- Comply with customer or contractual foreign travel requirements, including pre-travel and post-travel briefings and notifications.
- Report suspicious contacts upon completion of foreign travel to the Security Department.

Security shall report all adverse information to the Dept of Defense (DoD) through the Joint Personnel Adjudication System (JPAS), and other applicable Intelligence Community (IC) government agencies.

Physical Security of Classified Areas

- Physical security of DoD closed areas must meet the requirements stated in the NISPOM, Chapter 5.
- Physical security of Intelligence Community (IC) Special Compartmented Information (SCI) spaces must meet and maintain the requirements stated in ICD 705.

Information System Security of Classified Systems

- DoD accredited Information Systems must meet the requirements stated in the NISPOM, Chapter 8.
- IC accredited Information Systems must meet and maintain the requirements stated in ICD 503.

Security Training

- All employees shall complete 3V Precision Machining, Inc. required general security training.
- Cleared employees shall complete additional 3V Precision Machining, Inc. required training, such as re-indoctrination as well as Government mandated security training on an annual basis.

Workplace Security Standards and Counter-Intelligence Reporting Requirements

- Employees shall report workplace security incidents to include known or suspected misconducts to their supervisor and 3V Precision Machining, Inc. Security Department.

- Employees shall report suspected corporate espionage, counterintelligence and insider threat incidents to their 3V Precision Machining, Inc. Security Department.
- Security shall investigate allegations of suspected misconduct, malfeasance, fraud, theft or other criminal activity. When criminal allegations are supported by evidence and/or witnesses, Security shall notify 3V Precision Machining, Inc. Legal Department as well as the appropriate law enforcement agency
- Security shall report all counterintelligence and corporate espionage incidents to the Department of Defense and other applicable IC government agencies.

Classified Programs

- 3V Precision Machining, Inc. shall comply with the NISPOM, ICD, Contract Security Classification Specification (DD254) and other contract specific government directives.
- Security Department shall be engaged in the Request for Information/Request for Proposal (RFI/RFP) process to review and support security requirements.
- Program Managers shall appoint a program security coordinator, which may be a collateral duty.
- Program Managers shall engage security throughout the program lifecycle to identify and maintain security requirements.
- The Program Manager or contracts representative shall notify the program security coordinator when changes are made to the security clauses of a classified contract.

Insider Threat Mitigation

- 3V Precision Machining, Inc. must establish and maintain an Insider Threat program to detect, deter and mitigate Insider Threats (requirements forthcoming in NISPOM Conforming Change #2).
 - 3V Precision Machining, Inc. must designate a U.S. citizen employee, who is a senior official, as a key management official and is cleared in connection with the FCL, to establish, execute, supervise and direct the implementation and oversight of 3V Precision Machining, Inc.'s Insider Threat program.

Disciplinary Sanctions for Security Violations

- 3V Precision Machining, Inc. uses a graduated scale of disciplinary sanctions for employee violations of security regulations. Disciplinary actions include, but are not limited to, verbal warning, written warning, paid suspension, unpaid suspension, immediate termination, etc.
- Several factors determine the administrative or disciplinary actions to be applied to persons found responsible for a security procedural infraction or violation.
 - Type of incident
 - Procedural Infraction – Action that does not involve actual, suspected or potential compromise of classified information.
 - Security Violation – Action that reasonably could result in the loss or compromise of classified information.
 - Severity of the incident

- History of previous security related incidents or violations

Governance & Accountability

- Senior leadership is accountable for providing the required resources to implement and maintain a security program which meets all applicable compliance requirements.
- The Director of Security is responsible for developing and maintaining corporate security policies/instructions and providing oversight to program security coordinators.
- Managers are responsible for ensuring appropriate procedures are established to implement this policy and provide necessary resources and infrastructure to support implementation. Managers shall ensure employees and affiliated personnel comply with the requirements of this policy.
- Employees shall comply with the requirements of this policy and shall report to, or consult with, their manager or 3V Precision Machining, Inc. Security Department regarding any actual or perceived violations of law, regulation or 3V Precision Machining, Inc. policy.

References

- DoD Facility Clearance <http://www.dss.mil/diss/efcl.html>
- DoD JPAS <http://www.dss.mil/diss/jpas/jpas.html>
- DoD NISPOM <http://www.dss.mil/documents/odaa/nispom2006-5220.pdf>
- ICD 704 Personal Security http://www.dni.gov/files/documents/ICD/ICD_704.pdf
- ICD 705 Physical Security http://www.dni.gov/files/documents/ICD/ICD_705_SCIFs.pdf
- IC Directives <http://www.dni.gov/index.php/intelligence-community/ic-policies-reports/intelligence-community-directives>

Information Security Policy

Purpose & Scope

3V Precision Machining, Inc. is committed to protecting the confidentiality, integrity and availability of corporate, customer and business partner data for which it has stewardship through a comprehensive and systematic Information Security Program. This policy contains high-level guidelines and general principles for initiating, implementing, maintaining and improving that program.

This Policy applies to all 3V Precision Machining, Inc. employees, its subsidiaries and affiliates as well as to all information systems and assets owned or controlled by 3V Precision Machining, Inc., as well as to all personnel who access such networks, systems and information assets on the main network and does not apply to customer owned, approved and accredited systems.

Key Terms

Information Asset - System, network or media which stores, transmits or processes information.

Information Asset Owner - Individual who has been assigned the responsibility for controlling the production, development, maintenance, use and security of an Information Asset.

Information Custodian - Individual who has been assigned the responsibility to define specific control procedures, administer information access controls, implement and maintain cost-effective information control measures, and provide recovery capabilities for the information contained in the Information Assets under their control.

User - Individual, or system process acting on behalf of an individual, authorized to access an information system.

Policy

The Information Technology department is responsible for implementing an Information Security Program. 3V Precision Machining, Inc.'s Chief Information Officer (CIO), is responsible for establishing and maintaining an organizational framework to administer this program based on the high-level principles and guidelines contained in this policy.

Policy Exceptions: Technical or business requirements may necessitate an Exception from the Information Security policy. Requests for exceptions must have a justifiable business case and be subject to a documented risk assessment.

Roles & Responsibilities

Roles and Responsibilities must be clearly defined at all levels of the organization. Duties and areas of responsibility must be segregated, where possible, to reduce opportunities for unauthorized or unintentional modification or misuse of information assets.

Risk Management

Systematic assessments of the security risks to information, services and systems must be performed, using a standardized methodology, in response to changes in technologies, the organization and/or the threat environment and to inform decisions that impact the security of 3V Precision Machining, Inc. information assets. For each risk quantified by a risk assessment, a specific risk treatment must be identified and applied.

Asset Management

Protection of Information Assets: 3V Precision Machining, Inc. management will identify and maintain appropriate protections of Information Assets and designate information asset owners who are responsible for ensuring the appropriate information security protections for all information assets.

Acceptable Use of Information Assets: Rules for the acceptable use of 3V Precision Machining, Inc. information and assets associated will be identified and documented by Information Security. Employees and Third Parties using 3V Precision Machining, Inc. information assets must acknowledge, in writing, their responsibilities when using those assets.

Classification, Labeling and Handling of Information Assets: 3V Precision Machining, Inc. management, information asset owners, information custodians and users will ensure that information assets within their control are classified, labeled and handled in a manner commensurate with their value, legal and US Government requirements, sensitivity, and criticality to the organization and in accordance with documented standards and guidelines.

Ownership of Information Assets: 3V Precision Machining, Inc. retains legal ownership of all data, including files and messages, stored or transmitted on its computer and network systems and reserves the right to monitor and/or access this information without prior notice whenever there is a genuine business need.

Human Resource Security

Responsibility for Information Security: Employees, contractors and third-party users must have defined roles and responsibilities for information security and must perform those roles in compliance with this policy as a condition of employment and/or their contractual relationship with 3V Precision Machining, Inc.

Security Awareness Training: 3V Precision Machining, Inc. employees and, where relevant, contractors and third-party users must receive appropriate information security awareness training and regular updates for organizational information security policies, standards and procedures, in a manner commensurate with their job functions.

Consequences of Non-Compliance: Formal disciplinary processes will be in place for employees who have committed a security breach and/or whose actions have resulted in non-compliance with the principles and guidelines contained in this policy. Disciplinary processes will be consistent with 3V Precision Machining, Inc. Human Resource policies.

Maintaining Information Security while Traveling: While traveling outside of their country of citizenship, such as the U.S., 3V Precision Machining, Inc. employees must comply with this policy, as well all applicable regulations including, but not limited to, International Traffic in Arms (ITAR).

Maintaining Information Security during Role Changes, Transitions and Terminations: Standards and procedures will be in place to ensure that employees, contractors and third-party users exit the organization or change roles in an orderly and secure manner. Those standards and procedures will be designed to maintain appropriate levels of access control and to protect 3V Precision Machining, Inc. information assets during personnel changes, transitions or terminations.

Physical and Environmental Security

Physical Security Controls: Appropriate security controls must be implemented to prevent unauthorized physical access, damage or compromise of 3V Precision Machining, Inc.' information assets. Controls should be determined through a documented risk assessment.

Environmental Controls: Information processing equipment must be sited and protected to reduce the risks from environmental threats and hazards, and unauthorized access.

Taking Information Assets Off-Site: 3V Precision Machining, Inc. owned equipment, information and/or software must not be taken offsite without prior authorization (this does not apply to 3V Precision Machining, Inc. issued laptops and mobile devices designated to be taken offsite).

Communications and Operations Management

Standards and Operating Procedures: 3V Precision Machining, Inc. management must assign responsibilities and implement appropriate standards and operating procedures for the management and operation of all information processing facilities. Standards and operating procedures must be documented, maintained, and made available to all authorized users who need them to perform their job functions. The standards and procedures should define the manner in which the key principles, guidelines and requirements contained in this policy should be implemented.

Change Control: Changes to production information processing facilities and systems must be controlled utilizing documentation, planning, scheduling, approval and testing processes.

Operational Security Controls: Operational processes must be developed, implemented and maintained to ensure that critical technical and organizational security controls remain effective over time including, but not limited to: access control, account and password management, separation of development, test and operational environments; protection against malicious code, protection/encryption of removable media, network security and clock synchronization, secure use, storage and disposal of equipment and removable media; secure messaging, session timeouts, application security, mobile computing and teleworking, cryptographic controls, web-based security, and logging, monitoring and fault detection of 3V Precision Machining, Inc.'s information assets.

Access Control

Access Control Standards and Procedures: Standards and procedures must be in place to control the allocation of access rights to 3V Precision Machining, Inc.'s information assets. Technical and organizational access controls must be implemented, maintained and updated to ensure that access to information assets is consistent with those standards and procedures and commensurate with the roles and responsibilities of those to whom access is granted.

Development & Maintenance

Defining Information Security Requirements: All security requirements must be identified at the requirements phase of projects and must be justified, approved and documented as part of the overall business case for an information system.

Security Controls: Appropriate security controls must be designed into all systems and applications, to ensure correct information processing and to protect the confidentiality, integrity and availability of the data processed, transmitted and stored by those systems and applications.

Vulnerability Management: Technical vulnerability management must be in place in an effective, systematic, repeatable and measurable manner. Timely information about technical vulnerabilities of information systems being used within 3V Precision Machining, Inc. must be obtained, 3V Precision Machining, Inc.'s exposure to such vulnerabilities must be evaluated, and appropriate measures must be taken to address the associated identified risk.

Incident Management

Reporting Information Security Events and Weaknesses: Formal event reporting and escalation procedures must be in place for identified information security events and weaknesses associated with information systems.

Incident Response and Handling: Responsibility and methodologies for incident handling and response must be defined, those with incident handling responsibilities must be adequately trained, and a process to identify and apply lessons learned from security incidents must be implemented.

Vulnerability Management: Timely information about the technical vulnerabilities of information systems being used within 3V Precision Machining, Inc. must be obtained. The organization's exposure to such vulnerabilities must be evaluated and appropriate measures must be taken to address the identified risks.

Business Continuity Management

A business continuity management process must be in place to minimize the impacts on 3V Precision Machining, Inc. and to recover from the loss of information assets, to an acceptable level through a combination of preventive and recovery controls.

Information security requirements and controls must be integrated into business continuity plans. Business Continuity plans must be tested and updated regularly to ensure that they remain effective in protecting the confidentiality, integrity and availability of 3V Precision Machining, Inc.'s information assets.

Compliance

3V Precision Machining, Inc. must adhere with all statutory, regulatory, and contractual security requirements applicable to the design, operation, use, export, and management of information and information systems as well as the protection of personal information, intellectual property rights and organizational records.

Information Systems Audits: 3V Precision Machining, Inc. must develop processes to ensure that information systems and security controls receive periodic independent reviews and/or when significant changes to security implementations occur.

Reviews must be conducted by individuals independent of the area under review (e.g. an internal audit function, an independent manager or a third-party organization specializing in such reviews). Individuals carrying out these reviews should have the appropriate skills and experience to perform effective information security reviews.

Health & Safety Policy

Overview

3V Precision Machining, Inc. is committed to conducting business in a socially and environmentally responsible manner. This includes providing safe and healthy operations for its employees, its customers, and the public, assuring compliance with occupational safety & environmental requirements and preserving 3V Precision Machining, Inc. assets.

Policy

Environmental, Health and Safety (“EHS”) criteria and practices are dictated by various laws and regulations in the location in which 3V Precision Machining, Inc. operates.

In order to establish consistent expectations with respect to EHS performance, 3V Precision Machining, Inc. will:

- Meet all applicable environmental laws, regulations, and permit requirements.
- Comply with applicable laws and regulations relating to safety, health and environmental quality.
- Consider health effects and environmental impact before selecting production materials, before buying or leasing property, and when developing new products or processes.
- Design, operate and maintain facilities that minimize emissions and wastes, while maintaining a safe workplace.
- Solicit and respond to community concerns about environmental and health issues.
- Integrate safety, health and environmental goals into applicable business functions to include purchasing, design, testing, manufacturing practices, and product support.

- Ensure effective safety, health and environmental programs are continually validated and improved through disciplined risk evaluation and strategic planning.
- Recycle reusable materials and purchase products containing recycle materials to conserve energy and reduce waste.
- Periodically survey facilities for compliance with applicable laws and regulations.
- Work constructively with trade associations, government agencies customers and others to develop equitable laws, regulations or guidelines.
- Develop guidelines when 3V Precision Machining, Inc. determines additional protection beyond that provided by laws and regulations is appropriate.

Any 3V Precision Machining, Inc. employee who violates environmental, health & safety laws and regulations or do not comply with the intent of 3V Precision Machining, Inc.'s policies shall be subject to disciplinary action, up to and including termination of employment.

Insider Information Policy

Overview

This policy establishes the requirements for compliance with U. S. Securities and Exchange Act fair disclosure regulations ("Regulation FD") with respect to insider information affecting the market in 3V Precision Machining, Inc. securities and in securities of other companies in which 3V Precision Machining, Inc. has an interest.

Key Terms

Insider Information – Material, non-public *information* on the affairs, operations, or financial position of 3V Precision Machining, Inc. that may affect the price of securities of 3V Precision Machining, Inc. or otherwise might be of significance to a reasonable investor in determining whether to purchase, sell or hold securities of 3V Precision Machining, Inc.

Examples of insider information include changed earnings expectations, negotiations relating to possible acquisitions or divestitures, change of dividend terms, stock splits, arrangements preparatory to an exchange or tender offer, calls for redemption, and major new contracts.

Policy

3V Precision Machining, Inc. employees, officers and directors shall comply fully and in good faith with all laws and regulations, related to the timing of transactions, the purchase or sale of such securities and with the rules for safeguarding and disclosing insider information. Employees should seek guidance from 3V Precision Machining, Inc.'s General Counsel regarding their responsibilities under this policy.

Regulation Fair Disclosure (Reg. FD)

The Securities and Exchange Commission has adopted Regulation Fair Disclosure (referred to as “Reg. FD”) which prohibits the selective disclosure of material, non-public information, also known as “insider information”, about 3V Precision Machining, Inc. The reason for this rule is that selective disclosure of insider information undermines investor confidence and creates serious conflicts of interest by securities analysts.

3V Precision Machining, Inc. is committed to maintaining an active, public dialogue with institutional shareholders, analysts and other members of the shareholder community. 3V Precision Machining, Inc. will provide full, fair, accurate, timely, transparent and understandable disclosure of 3V Precision Machining, Inc.’s historical performance and future prospects, in accordance with SEC rules and regulations and generally accepted accounting principles.

Accordingly, 3V Precision Machining, Inc. will not disclose insider information that has not been previously disclosed to the public in one-on-one conversations with investors, during investor conferences or analyst calls not open to the public, or in any other non-public forum nor will 3V Precision Machining, Inc. update previously issued guidance in one-on-one conversations. However, in the event that 3V Precision Machining, Inc. inadvertently discloses material non-public information on a selective basis, 3V Precision Machining, Inc.’s General Counsel should be immediately contacted in order to take prompt corrective actions (filing report with the SEC within 24 hrs prior to the next day’s trading).

Trading Restrictions

Federal securities laws prohibit insiders of 3V Precision Machining, Inc., which includes its employees, officers and members of its board of directors, from trading in the securities of 3V Precision Machining, Inc. on the basis of insider information. Employees can have personal liability for providing information to anyone outside 3V Precision Machining, Inc. (your family, your friends or anyone else) if that person uses the information to trade in the stock of 3V Precision Machining, Inc. It is a violation even if you or the person who receives the information does not actually make a profit or receive compensation.

All employees, including employee family members and relatives, that become aware of any insider information (information that has not yet been made available to the general public by press release or otherwise), are strictly prohibited from buying or selling 3V Precision Machining, Inc. securities or directly or indirectly disclosing such information to any other person who may trade in securities of 3V Precision Machining, Inc. until the business day following the day in which 3V Precision Machining, Inc. makes such information available to the general public.

Trading of other 3V Precision Machining, Inc. securities with which 3V Precision Machining, Inc. has initiated discussions or negotiations relating to acquisition, divestiture, or other important contractual relationships shall be ruled by the same considerations as the timing of transactions in 3V Precision Machining, Inc. stock.

Blackout Policy

Directors, Officers or Employees subject to trading prohibitions. Employees that are identified as a director, officer or under 3V Precision Machining, Inc.'s insider trading list are subject to periodic prohibitions on the trading of 3V Precision Machining, Inc.'s securities ("Blackout Periods"). In specific, these employees are required to obtain written clearance from 3V Precision Machining, Inc.'s General Counsel before selling or purchasing 3V Precision Machining, Inc. equity securities except through the straight exercise of an option under a 3V Precision Machining, Inc. employee stock option plan, when stock is purchased and held for investment, or ongoing purchases through a continuing election under 3V Precision Machining, Inc.'s retirement/401K plans.

The following outlines the terms of the blackout policy, which applies to all transactions in 3V Precision Machining, Inc. securities including open market transactions and other purchases and sales, exercises of stock options (including cashless exercises, but subject to certain exceptions referred to below), gifts, trust transfers and other non-sale transfers. These restrictions also apply to employee's spouse, children and relatives who share employee's home and certain entities in which you or any of the mentioned family members have a financial interest (e.g., certain trusts, partnerships and corporations).

- *Quarterly Blackout Periods.* The information contained in 3V Precision Machining, Inc.'s quarterly earnings announcements may be considered material nonpublic information. To protect against potential insider trading based on access to such information, 3V Precision Machining, Inc. has established four Quarterly Blackout Periods when transactions in 3V Precision Machining, Inc. securities are prohibited for those subject to restrictions during regular Quarterly Blackout Periods. The trading window will be closed for at least ten business days prior to the earnings release.
- *Blackouts prior to Board Meetings.* In addition to the Quarterly Blackout Periods, transactions in 3V Precision Machining, Inc. securities are prohibited for the ten calendar days preceding meetings of the board of directors.
- *Special Blackouts.* A special blackout may be implemented at other times, such as during the pendency of certain transactions or when some other extraordinary 3V Precision Machining, Inc. event is pending. Designated employees shall receive written notice as to the details a Special Blackout.

Social Media Policy

Overview

3V Precision Machining, Inc. recognizes that the internet provides opportunities to participate in interactive discussions and to share information using a wide variety of social media, such as, but not

limited to, Facebook, Twitter, LinkedIn, YouTube, Flickr, blogs and wikis (collectively without limitation, “Social Media”). However, employees’ use of Social Media can pose risks to 3V Precision Machining, Inc. confidential and proprietary information, reputation, employees, brands and customers information, and can jeopardize 3V Precision Machining, Inc.’s compliance with business rules and laws.

To minimize these business and legal risks and to ensure that 3V Precision Machining, Inc.’s IT resources and communications systems are used for appropriate business purposes, 3V Precision Machining, Inc. expects employees and contractors to adhere to the following policies and guidelines regarding the use of Social Media.

Policy

While all 3V Precision Machining, Inc. employees are welcome to participate in Social Media, when engaging online, employees should not represent themselves as spokespeople for 3V Precision Machining, Inc. and should take appropriate steps to ensure that all comments are attributed to themselves personally and not taken as being comments on behalf of 3V Precision Machining, Inc.

The overall goal is simple: to participate online in a respectful, relevant way that protects our 3V Precision Machining, Inc.’s reputation and, of course, follows the letter and spirit of the law.

Additionally, since 3V Precision Machining, Inc. does business with the U.S. government, employees participating in/on social networking applications and/or sites must remain cognizant of the fact that such sites may expose them to known vulnerabilities presented by active use of these forums by intelligence agencies and business competitors.

Guidelines

- **Identify yourself** -- Transparency makes claims more credible. If you are writing about 3V Precision Machining, Inc. or a competitor, use your real name, identify that you work for 3V Precision Machining, Inc., and be clear about your role.
- **Be Honest** -- Your honesty will be noted in the Social Media environment and never represent yourself or 3V Precision Machining, Inc. in a false or misleading way. All statements must be true; all claims must be substantiated.
- **Be Respectful** -- Post respectful comments, refrain from offensive comments, and when disagreeing with others’ opinions, keep it appropriate and polite. If you find yourself in a situation online that looks as if it is becoming antagonistic, do not get overly defensive and do not disengage from the dialogue in a polite manner that reflects well on 3V Precision Machining, Inc..
- **Add Value** -- Post meaningful comments and refrain from spam and remarks that are off-topic. Stick to your area of expertise and feel free to provide unique, individual perspectives on

non-confidential activities at 3V Precision Machining, Inc..

- **Get Permission and Publish Facts** -- Use common sense and common courtesy. For example, it is best to ask permission to publish or report on conversations that are meant to be private or internal to 3V Precision Machining, Inc. Make sure your efforts do not violate 3V Precision Machining, Inc.'s privacy, confidentiality, and legal guidelines for external commercial speech.

If you want to write about the competition, make sure you indicate specifically that your comments are personal and that they do not reflect the opinion of 3V Precision Machining, Inc. Make sure you behave diplomatically, have the facts straight and have the appropriate permissions.

- **Protect 3V Precision Machining, Inc. and Customer Information** -- Export controlled, classified or 3V Precision Machining, Inc. proprietary information must never be discussed on Social Media under any circumstances.

3V Precision Machining, Inc. employees are strongly discouraged from commenting on sites devoted primarily to 3V Precision Machining, Inc. financial or stock performance (e.g. Yahoo Finance) and are expressly prohibited from doing so when in receipt of confidential/non-public material information.

Refrain from participating in Social Media with regards to 3V Precision Machining, Inc. related litigation, including any parties to 3V Precision Machining, Inc. litigation, and when the topic being discussed may be considered a crisis situation.

- **Code of Conduct** -- Any statements or activity undertaken on a social media channel found to be in violation of 3V Precision Machining, Inc.'s Code of Conduct or any policy will carry the same consequences as any other policy or Code of Conduct violation.
- **Engagement for Business Purposes** -- Mainstream media inquiries or requests for an official 3V Precision Machining, Inc. comment/position on a matter must always be referred to the Communications department. Use of social media as part of a marketing and communications strategy ultimately rests with the Communications department.

Government Relations Policy

Overview

The purpose of this policy is to provide a structured process and governance model for engaging with Congress on issues considered essential to accomplishing the strategic goals and operational objectives of 3V Precision Machining, Inc. This policy encompasses all business-related contact, whether, direct or indirect (via consultants, prime contractors or teammates) with Congress on issues of importance to 3V Precision Machining, Inc.

Policy

It is the policy of 3V Precision Machining, Inc. to pursue a program of congressional relations to ensure issues, programs and concerns of 3V Precision Machining, Inc. are strategically prioritized, understood and supported on “Capitol Hill.” Policies and procedures herein are intended to ensure 3V Precision Machining, Inc. has a focused Congressional strategy that ensures the greatest success for 3V Precision Machining, Inc. All contact with Congress shall be pre-approved by 3V Precision Machining, Inc.’s Government Relations (GR) department. In the case of classified or compartmentalized programs, that coordination will be conducted with 3V Precision Machining, Inc.’s VP, Congressional Relations, but be implemented by personnel with the appropriate clearances who have also been designated as 3V Precision Machining, Inc.’s multi-divisional representatives with the intelligence committees.

Congressional Contact

While everyone has a right as a citizen to contact their elected representatives on issues of personal interest, contact with Congress and strategies for dealing with Congress on issues on behalf of 3V Precision Machining, Inc. shall only be accomplished through Government Relations (GR) department. In addition, all inquiries regarding a congressional activity or concern shall be forwarded to 3V Precision Machining, Inc.’s Government Relations (GR) department. Employees shall not hire outside consultants for the purposes of lobbying Congress unless explicitly approved by 3V Precision Machining, Inc.’s Government Relations (GR) department.

Contractors and Teammates

Employees shall not request and/or commit a contractor or teammate to supporting 3V Precision Machining, Inc. activities on Capitol Hill unless expressly approved by 3V Precision Machining, Inc.’s Government Relations (GR) department. Requests by prime contractors or teammates for assistance with Capitol Hill shall be immediately forwarded to 3V Precision Machining, Inc.’s VP, Congressional Relations. Our intention is to support such requests to the greatest extent possible.

Campaign Contributions

Requests for campaign contributions to support a political candidate or sitting Member of Congress, should be forwarded to 3V Precision Machining, Inc.’s Government Relations (GR) department. Individual employees may make personal contributions to candidates and political parties of their choice. Such individual or personal contributions are not reimbursable by 3V Precision Machining, Inc. and are not tax deductible.

Political Action Committee

3V Precision Machining, Inc. has a Political Action Committee to which employees are encouraged to voluntarily contribute. Whenever circumstances require a reduction of at least 25 positions in facility headcount or substantial change in a 3V Precision Machining, Inc. facility’s community footprint,

Human Resources department is required to notify Government Relations (GR) department of related details, including actions taken to cushion adverse employee impacts. This information will be used to notify affected DoD, government agency, and House and Senate offices immediately prior to planned public announcements.

Annual Authorization and Appropriations Process

During the annual Congressional authorization and appropriations process, 3V Precision Machining, Inc. comments regarding specific programs will be a part of the continuing business development efforts involving all other elements of the Federal Government's Planning, Programming, and Budgeting System (PPBS) process. Every effort shall be made to develop a strong rationale ("good story") as well as strong "customer support" for each program prior to contact with Congress.

The annual cycle is initiated with delivery of the President's Budget request in early February, and congressional members' inputs to the various oversight committees are generally required by the end of March. Preparation, prioritization and obtaining the highest level of executive branch customer support must, therefore, be finalized by no later than December 1st of the prior year to maximize 3V Precision Machining, Inc.'s potential for success in Congressional marketing.

Programs requiring congressional support should be forwarded through the Business Development department to be discussed with the Government Relations (GR) department by no later than the fall of the year PRIOR to budget submission. These discussions should coincide with evolution from the programming portion of the PPBS cycle into the Budgeting portion of the cycle as the budget gains visibility and issues become better understood. Once a program is identified as a potential congressional interest item, the Business Development department will assign a point of contact (POC) to work directly with the Government Relations (GR) department to ensure maximum success. Strategic prioritization of 3V Precision Machining, Inc. budgetary and program support requests for individual members of Congress is an absolute necessity. The Business Development department shall prioritize programs and communicate them to the Government Relations (GR) department.

Records Retention Policy

Overview

The purpose of this policy is to establish U.S.-based retention guidelines for identifying, maintaining, and properly destroying records for operational integrity, historical review, litigation, claims, government inquiries, compliance, tax audits, and other internal requirements.

Policy

At a minimum, records shall be maintained in accordance with the retention periods set forth in the Records Retention Schedule in Appendix A which are based upon compliance with standard contractual

and legal requirements. Under special circumstances or for specific operational requirements, records may be retained beyond these minimum retention times for purposes with the approval of the Legal Department. Records containing any extraneous and immaterial data (e.g., unnecessary preliminary drafts, rough notes, etc.) shall be purged in a timely fashion and do not need to be retained.

Unless impracticable, records generated or received by multiple areas of the (i.e. corporate Headquarters, divisions, business units or subsidiaries) should be retained by the area primarily utilizing or making those records available in the ordinary course of business and not retained in duplicate areas (others should destroy the records when it has outlived its usefulness).

Retention periods published in the Records Retention Schedule are established for general categories of records, since similar record types may be identified differently throughout the various areas of 3V Precision Machining, Inc. Managers should exercise good judgment in determining how long records which cannot be classified to one of the general categories listed in the schedule guideline should be retained. Any questions regarding the retention period for a specific record should be referred to 3V Precision Machining, Inc.'s Legal Department.

Record Destruction

All physical and electronic records existing beyond the retention period specified in the Records Retention Schedule shall be destroyed by incineration, shredding, deletion, or other appropriate methods applicable for electronic data and other media unless otherwise directed by the Legal Dept.

Storing & Retrieving Records

Physical or electronic records may be stored at off-site locations and/or through a third-party vendor. Certain departments can maintain their own storage.

The Records Management Office is solely responsible for coordinating on-site and off-site storage and retrieval of physical and electronic records. Physical and electronic records placed into storage shall be labelled with the following information and must not contain any classified information:

- Date placed into storage
- Basic inventory of contents (specific type of records and description)
- Date to be destroyed, in accordance with Records Retention Schedule

General Responsibilities

- Legal Department: Periodically review and update this policy, the Records Retention Schedule, and the destruction procedures with regard to revised contractual and legal requirements. Issue written directives when required to preserve records in exception to Records Retention Schedule

- Facilities: Establish detailed procedures and work instructions to ensure records are organized and available for internal use, including tracking and archiving capability, and properly destroyed in accordance with this policy
- Information Technology: Ensure electronic data is stored, maintained, and destroyed/deleted in compliance with this policy
- Functions: Monitor and enforce compliance with the established retention periods
- Internal Audit: Audit at least 2 functions annually for compliance with this policy

Appendix A: Records Retention Schedule

Retention periods detailed in the below schedule should be computed from January 1 of the calendar year subsequent to the date the record was created. For example, if a record was created on 2/15/2015 and the retention period is 2 years, the record should be disposed of soon after 1/1/2018.

Record Category	Retention Period (Number of Years)
Shareholder Records (stock, dividend records, etc.)	Permanent
Administrative Records (annual reports)	Permanent
Financial Statements	
• Certified by public accountants	Permanent
• Legal entity and management	Monthly 6, Quarterly 10, Year-end 10
• Securities and Exchange Commission	Reports 10, Records Permanent
• General Ledgers and Journals	Permanent
• Period Trial Balances	10
• Capital Asset Records	6 after disposal of assets
General Accounting (capital asset records)	10 after disposal of the asset
Tax Related Documents	
• Federal Income Tax Returns	Permanent
• State Income and Franchise	10
• Personal Property	6
• Sales and Use	6
• Unemployment Tax	7
• Worker's Compensation Reports	7
General Accounting (closing schedules and reporting)	Permanent
• Job Authorization Control	Permanent
• Internal Operating Reports by Accounting Period	6 Monthly, 10 Quarterly, Year-end Permanent
• Overhead Trial Balance	1

Record Category	Retention Period (Number of Years)
General Accounting (closing schedules and reporting) - continued	
• Purchase Orders	6
• Debit Memos	6
• Petty Cash Vouchers	6
• Miscellaneous Billing and Logbooks	6
• Profit Schedule/Backlog/Sales Profit	6
• Physical Inventory Records	6
• Suspended Journal Entries	6
• PA Billing Folder	6
• PA Billing Subledgers	Current year only
Accounts and Notes Receivable	
• Closed Ledger Cards	6
• Sales Invoices	6 - after final payment
• Cash Requirements Reports	Current year only
• Cash Receipts Records	6
• Customer Contracts	6 - after final payment
• Inventories – Record of Physical	6
• Accounts Receivable Trial Balance	6
• Accounts Receivable Tracking Reports	1
• Accounts Receivable Due Invoices	1
• Accounts Receivable Aged Trial Balance	6
Accounts Payable	
• Bank Statements and Reconciliations	5
• Check Register	6
• Remittance Statement	6
• Accounts Payable Vouchers	6
• Deposit Slips	6
• Vendor Invoices and Credits	6
• Travel Expense Reports	7
• Travel Expense Reports	7
• Travel Accounts Payable	6
• Cash Disbursement Records	6
• Bank Statements and Reconciliations	6
• Remittance Statement	6
• Accounts Payable Check Registry	6
• Deposit Slips	6
Audits	
• External Financial Statement Audits	Reports Permanent, Support Records 7

Record Category	Retention Period (Number of Years)
Audits - continued	
<ul style="list-style-type: none"> Internal Audit Reports and Work Papers 	7
Board of Director - Meeting Minutes	Permanent
Recommendations (signed by a corporate officer)	Permanent
Policies/Procedures – Obsolete	10
Payroll Records and Reports	
<ul style="list-style-type: none"> Tax Returns, W-2s, Income Tax Withheld 	7
<ul style="list-style-type: none"> Payroll Registers, Employee Earning Records 	7
<ul style="list-style-type: none"> Cost Labor: PO Purge Reports 	Permanent
<ul style="list-style-type: none"> Labor Distribution Cost Records 	7
<ul style="list-style-type: none"> Employee Timecards and similar records to determine hours worked or of service 	10 - after the longer of (a) duration of employment, and (b) as long as may be relevant in determining plan entitlements
<ul style="list-style-type: none"> Employee Deduction Authorizations 	7 - after last effective date of document or employee termination
<ul style="list-style-type: none"> Savings Bond Records 	5
<ul style="list-style-type: none"> Deduction Register 	7
<ul style="list-style-type: none"> Miscellaneous Payroll Register 	7
<ul style="list-style-type: none"> Retro-pay Adjustment Memos 	7
<ul style="list-style-type: none"> Payroll Accounting Bank Statements and Reconciliations 	2
<ul style="list-style-type: none"> Payroll Rate Control 	7
Labor	
<ul style="list-style-type: none"> Suspended Labor Records, Weekly Timecard Reports, Shift Change Report, Vacation/Sick Reports 	7
<ul style="list-style-type: none"> Salaried Overtime Authorization 	2
<ul style="list-style-type: none"> Labor Detail by Charge Number 	Permanent on microfiche
Cancelled Checks	
<ul style="list-style-type: none"> Payroll and Retirement Plan Checks 	5, Other 6
<ul style="list-style-type: none"> Registers 	Permanent
Schedule of Profit Calculation	Quarterly 10, Monthly 6
Cost Statements	
<ul style="list-style-type: none"> Cost Statements 	3 - from final payment
<ul style="list-style-type: none"> Cost Summary Job 	3 - after final payment
<ul style="list-style-type: none"> Cost Recap by Account 	1
<ul style="list-style-type: none"> Cost Recap by Product Line 	1
<ul style="list-style-type: none"> Cost Control by Element and Job 	3 - after final payment
<ul style="list-style-type: none"> Cost Reconciliation 	3 - after final payment

Record Category	Retention Period (Number of Years)
Contracts/Agreements - continued	
<ul style="list-style-type: none"> Promissory Notes, Leases 	6 after termination
<ul style="list-style-type: none"> Non-Disclosure Agreements (NDA) 	6 after expiration of all terms
<ul style="list-style-type: none"> Deeds and Mortgages 	Permanent
<ul style="list-style-type: none"> Insurance Policies (expired) 	10 after expiration
<ul style="list-style-type: none"> All legal documents reflecting ownership in, or title to Real Estate (i.e., deeds, mortgages, easements, right of way) 	Permanent
<ul style="list-style-type: none"> Depreciation Schedules 	Permanent
Human Resources	
<ul style="list-style-type: none"> Advertisements, posted job notices, applications, electronic resumes, interview evaluations, and related correspondence 	3 - accept when applicant is hired, which will be combined with employee file
<ul style="list-style-type: none"> Drug Test Results 	Permanent if positive, No retention if negative
<ul style="list-style-type: none"> I-9 Forms and related documents 	For as long as the individual is employed. After termination, either 3 - after the date of hire, or 1 year after the date employment is terminated, whichever is later
<ul style="list-style-type: none"> Self-identification forms 	2
<ul style="list-style-type: none"> Employee File, including at a minimum: <ul style="list-style-type: none"> - Application (with resume if available) - School transcripts or verifications - Offer letter - Compensation history, titles, service dates, job status, etc. - Employment Agreements - Performance Review - Disciplinary Records 	10 - following termination
<ul style="list-style-type: none"> EEO-1 and VETS-100 Forms 	For current and 2 previous
<ul style="list-style-type: none"> Affirmative Action Plans (AAP) and supporting documents, including applicant flow and annual equal pay analysis records 	For current and prior plan period
<ul style="list-style-type: none"> Records relating to Layoff Selection Decision (including, but not limited to, banding analysis, adverse impact analysis and signed release but specifically <u>excluding</u> drafts and notes) 	2
<ul style="list-style-type: none"> Collective Bargaining Agreements 	3 - after agreement ends
<ul style="list-style-type: none"> Contracts with Training Vendors 	1 - after expiration of contract
<ul style="list-style-type: none"> Education and Training Manuals 	While courses remain current
<ul style="list-style-type: none"> Individual Education and Training Records 	2 - after employment termination

Record Category	Retention Period (Number of Years)
Human Resources - continued	
<ul style="list-style-type: none"> • Insurance Policies 	10 - from date when it last was in effect or date services are last provided, whichever is later. However, if policy serves as plan document, permanent
<ul style="list-style-type: none"> • Group Insurance Records 	10 - from the date when it was last in effect or the date services are last provided, whichever is later. However, if relevant to participant-specific activity, retention period is the same as that of "Employee Benefit Records" below
<ul style="list-style-type: none"> • Health Plan Records (including, but not limited to, HIPAA records related to privacy, authorizations, agreements to restrict the use of Disclosure, complaints regarding privacy practices, notices, plan documents, request for access to protected health information, training, accountings of disclosures, designations, sanctions, amendments, business associate contracts, and other related issues) 	6 - from the date of the document's creation or the date when it last was in effect
<ul style="list-style-type: none"> • Employee Benefit Records, including: <ul style="list-style-type: none"> - Enrollment Forms - Life Insurance Beneficiary Designations - Change Forms - Student Status Information - STD Information - Correspondence between employer and benefit plan participant 	10 - after the longer of: (a) duration of employment, and (b) as long as may be relevant in determining plan entitlements
<ul style="list-style-type: none"> • LTD information 	10 - after the longer (a) duration of employment, and (b) as long as relevant in determining plans
<ul style="list-style-type: none"> • Trust Agreements 	Permanent
<ul style="list-style-type: none"> • EEO Cases, Evidence, and Exhibits 	Permanent
<ul style="list-style-type: none"> • College Relations Interview Records 	2
<ul style="list-style-type: none"> • Immigration Records pertaining to 3V Precision Machining, Inc. sponsored Visas (except H-1B Visas) (including, but not limited to Visas, resumes, advertisements, and job descriptions) 	5
<ul style="list-style-type: none"> • H-1B documentation 	1 year beyond the last date

Record Category	Retention Period (Number of Years)
Environmental	
<ul style="list-style-type: none"> Audit related Final Reports and Self-Audit Reports 	Until next audit is final
<ul style="list-style-type: none"> Consent Decrees/Administrative Orders: State or Federal 	Permanent
<ul style="list-style-type: none"> Contamination Assessment/Remediation: State/Federal, Superfund or RCRA, Analysis, Correspondence, Reports, Contracts, Schedules, Financial Data 	Permanent
<ul style="list-style-type: none"> Deeds/Leases: Purchase/Acquisition, Leases, Agreements 	Term of lease/agreement plus 6
<ul style="list-style-type: none"> Due Diligence: Reports on Acquisitions, Divestitures, Closures, Analysis, Contracts 	Permanent
<ul style="list-style-type: none"> EPCRA TRI Form R: <ul style="list-style-type: none"> Annual Report, SARA 311, 312, 313 Supporting Documentation, Calculations, Assumptions 	Permanent 3
<ul style="list-style-type: none"> Hazardous, Universal, and RCRA Non-Regulated Waste: <ul style="list-style-type: none"> Manifests, Shipping Documents, Land Ban Notification, Waste Determinations, Analysis, Exception Reports, Annual Reports Inspection Logs, Contracts/Agreements, Invoices 	Permanent 3
<ul style="list-style-type: none"> Invoices: Vendor/Contractor Invoices and Credits 	3
<ul style="list-style-type: none"> Insurance Policies: Policies, Notice of Actual or Potential Claims 	Permanent
<ul style="list-style-type: none"> Landfills Records: Contracts, Invoices, Shipping Documents, Volume of Non-Hazardous Solid Waste 	Permanent
<ul style="list-style-type: none"> Notice/Demand Letters: State or Federal notice of potential liability for CERCLA type action, or request for information 	Permanent
<ul style="list-style-type: none"> Notice of Violation/Citation/Complaints: <ul style="list-style-type: none"> Federal, State or Local notice of noncompliance with permit or regulatory requirements, Self-notification, Corrective Action Documentation 	7
<ul style="list-style-type: none"> PCB Records: Annual Reports, Inspections, Analysis, Maintenance, Spill/Decontamination Records 	Permanent
<ul style="list-style-type: none"> Permits: <ul style="list-style-type: none"> Current and Past Federal, State, Local: Air, Water (NPDES, SPDES, POTW), Stormwater, Aboveground Storage Tanks and Underground Storage Tanks, Solid Waste, NRC, etc. Applications (including renewals), notifications, registrations, calculations, assumptions, correspondence, supporting documentation Compliance Monitoring Reports, DMRs, Inspections, Analysis, Instrument Calibration Records, Closure Docs 	Permanent 3 - from life of permit 3 - from life of permit

Record Category	Retention Period (Number of Years)
Environmental - continued	
<ul style="list-style-type: none"> Recycle/Reclaim/Reuse: Inventories, Contracts, Invoices, Payments, Shipping Documents 	Permanent
<ul style="list-style-type: none"> Special Projects/Investigations/Construction: Correspondence, Scope of Work, Proposals, Contracts, Construction Documents, Purchase Orders, Invoices, Reports, Plans 	10 - from completion
<ul style="list-style-type: none"> Emergency/Contingency Plans: SPCC, Emergency Response Plans, Contingency Plans 	Current version
<ul style="list-style-type: none"> Waste Contractor Audits: <ul style="list-style-type: none"> Tier I: Financial, Insurance, Regulatory Assessments Tier II: Onsite Audit Documentation and Report, Risk Evaluation 	Permanent Permanent
Health and Safety	
<ul style="list-style-type: none"> Agency Inspections: Notifications, Inspection reports, Corrective Actions 	7 - from the later of report or end of corrective action
<ul style="list-style-type: none"> Internal Audits: Final Report (most current), Previous Audit Reports, Self-Audit Report, Working Papers, Completed Protocols, Inspection Reports/Logs, Correspondence 	Next audit
<ul style="list-style-type: none"> Emergency Plans: Evacuation, Response, Fire Prevention and Protection, Hazardous Materials/Waste Response 	Current plan
<ul style="list-style-type: none"> Employee Exposure: Sampling and Analysis Results, Medical Records, Monitoring, Reports, Correspondence 	Permanent
<ul style="list-style-type: none"> Employee Medical Records: Laboratory Tests, Doctor(s) Reports, Monitoring Results, Audiometric Testing, Noise Monitoring 	10 - following termination
<ul style="list-style-type: none"> Indoor Air Quality: Correspondence, Monitoring, Analysis, Reports 	6
<ul style="list-style-type: none"> Industrial Hygiene Surveys: Correspondence, Monitoring, Analysis, Reports 	Permanent
<ul style="list-style-type: none"> Injury/Illness Records: Accident Investigations, Corrective Actions, Doctor(s) Reports 	Permanent
<ul style="list-style-type: none"> MSDS: Material Safety Data Sheets, and Inventory of Chemicals (What, Where, and When) 	30
<ul style="list-style-type: none"> Notice of Violation: Report from Agency, Self-Notification, Correspondence, Corrective Action, Record of Payment 	7
<ul style="list-style-type: none"> OSHA Reports: OSHA 300 Logs 	5 - following the end of the year covered in the Log
<ul style="list-style-type: none"> Self-Inspections: Inspection Logs, Corrections Actions (Fire Protection, PPE, Emergency Response, etc.) 	3

Record Category	Retention Period (Number of Years)
Health and Safety - continued	
<ul style="list-style-type: none"> Special Projects: Correspondence, Proposals, Scope of Work, Reports, Contracts, Purchase Orders, Invoices 	3 - from completion
Government Contracts	
<ul style="list-style-type: none"> Government contracts and subcontracts (including all changes, modifications, and other related records supporting performance and charges, i.e., labor and material charges) 	3 - after receipt of final payment unless otherwise specified therein
<ul style="list-style-type: none"> Government contracts relating to Invention Rights 	Permanent
<ul style="list-style-type: none"> General Correspondence 	6
<ul style="list-style-type: none"> Correspondence related to a Contract 	Same as the Contract
<ul style="list-style-type: none"> Executive Correspondence 	Permanent
Contracts/Agreements	
<ul style="list-style-type: none"> Resale Agreements 	6 - after expiration of obligation by either party
<ul style="list-style-type: none"> All data, forms and documents, RFPs, proposals, etc., pertaining to all stages of the contract negotiations, changes, and final contract with subparts or changes 	3 - after final payment
<ul style="list-style-type: none"> Contracts with sales agents, representatives, distributors, etc. 	8 - after expiration
<ul style="list-style-type: none"> Other Contracts and Agreements 	6 - after expiration
<ul style="list-style-type: none"> Other International Contracts and Agreements 	May vary depending on jurisdiction
QA Records	
<ul style="list-style-type: none"> QA Non-Vital Records 	3 - after final payment
<ul style="list-style-type: none"> Product Hazard Prevention Records 	Expected life of equipment
Export Records	
<ul style="list-style-type: none"> Export Shipment Documentation (including sales order records and booking packages) and export clearances other than shipments 	5 - from the expiration of export license or agreement
<ul style="list-style-type: none"> Foreign National Visitor Sponsor Forms & Visitor Logbooks 	5
<ul style="list-style-type: none"> Long or Short-Term Contracts requiring Export Authorization. 	6
Intellectual Property	
<ul style="list-style-type: none"> Copyright and Trademarks 	Permanent
<ul style="list-style-type: none"> Patents (Patent Office Originals), application files, and disclosures 	30
<ul style="list-style-type: none"> Royalty Records and Agreements 	20 - after expiration
Engineering Notebooks	
	30

Record Category	Retention Period (Number of Years)
Miscellaneous	
<ul style="list-style-type: none"> • Lobbying, Election and Campaign Finance Records <ul style="list-style-type: none"> - United States • State and Local 	6 Consult State & Local Regulations
<ul style="list-style-type: none"> • Visitor Log Data 	2

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Precision Machining, Inc.

3V Precision Machining, Inc.

Employee Declaration: Code of Conduct

I understand the entire 3V Precision Machining Inc. **Code of Conduct** is available for me to read and I agree to abide by all company policies stated therein.

Employee Name (print)

Employee Signature

Date

NOTE: The information provided in this document is intended for informational purposes and is subject to change at any time without prior notice at 3v Precision Machining, Inc.'s sole discretion.

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