



CODE OF BUSINESS CONDUCT AND ETHICS

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our *actions*. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: Will this build trust and credibility for Socagee Services? Will it help create a working environment in which Socagee Services can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering “yes” to those questions and by working every day to build our trust and credibility.

Socagee Services will not tolerate discrimination, harassment or any behavior or language that is abusive, offensive or unwelcome.

Create a Culture of Open and Honest Communication

At Socagee Services everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes by asking the right questions at the right times.

Socagee Services will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

For your information, Socagee Services whistleblower policy is as follows:

Employees are encouraged, in the first instance, to address such issues with their managers or the HR manager, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her manager or HR, Socagee Services Chief Financial Officer does operate with an open-door policy.



Set Tone at the Top

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Socagee Services, we want the ethics dialogue to become a natural part of daily work.

Uphold the Law

Socagee Services' commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Socagee Services' policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Competition

We are dedicated to ethical, fair and vigorous competition. We will sell Socagee Services products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Socagee Services or the sales of its products or services.

Health and Safety

Socagee Services is dedicated to maintaining a healthy environment. A safety manual has been designed to educate you on safety in the workplace. If you do not have a copy of this manual, please see the HR department.



Avoid Conflicts of Interest

Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Socagee Services may conflict with our own personal or family interests. We owe a duty to Socagee Services to advance its legitimate interests when the opportunity to do so arises. We must never use Socagee Services property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Socagee Services.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict-of-interest question should seek advice from HR. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from the HR department.

Gifts, Gratuities and Business Courtesies

Socagee Services is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Socagee Services was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, entertainment or other benefits from persons or companies with whom Socagee Services does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Socagee Services or customers, or would cause embarrassment or reflect negatively on Socagee Services' reputation.

Accepting Business Courtesies

Most business courtesies offered to us in the course of our employment are offered because of our positions at Socagee Services. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at Socagee Services to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that Socagee Services maintains or may establish a business relationship with.



Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Socagee Services is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain Socagee Services business.

Promote Substance Over Form

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away. At Socagee Services we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that Socagee Services is committed to doing the right thing.

Although Socagee Services' guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department.

Socagee Services takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. Socagee Services is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.



Socagee Services is an equal employment employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

Be Loyal

Confidential and Proprietary Information

Integral to Socagee Services' business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Use of Company Resources

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Socagee Services are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business.

In order to protect the interests of the Socagee Services network and our fellow employees, Socagee Services reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or Socagee Services' intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to HR.



Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing comply with the Socagee Services guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- Is this the right thing to do?

CORE Values

- HONESTY & INTEGRITY | Doing the right thing when no one is looking
- EXCELLENCE | You get one chance to make a first impression
- ACCOUNTABILITY | Know your responsibilities and live up to your commitments
- FLEXIBILITY | The only thing permanent is change
- CANDOR | Open and honest communication
- TEAMWORK & SAFETY | We are in this together ... no one left behind

Information and Resources

Chief Financial Officer

Travis Cotten

travis.cotten@socagee.com