

# Code of Business Conduct and Ethics

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## From Steve

Harvest Health and Recreation is a pioneering company. We bravely seek to improve lives through the goodness of cannabis. We have an ambitious goal of being the most impactful cannabis company in the world. And we seek to live our vision of *Cannabis for You* by making cannabis accessible to those who want to benefit from it. We can contribute to better health and a better world by working together to create a great company.

Because we operate in a newly legalized industry, there are – and will continue to be – a number of legal and compliance obstacles to navigate in our day-to-day work. As one of the largest companies in an industry that is under close scrutiny, we must be very careful to remain in compliance with applicable laws and regulations. Our path to greatness will not be an easy one, and we rely on the commitment of each of you not only to build our business, but also to maintain compliance with the many laws that govern our industry.

I ask each of you to read this Code and to live it in your work. If you have questions about the Code, our policies or the law, please ask. Harvest has a number of folks you can turn to – including the people in Human Resources, Legal, and Compliance Departments – with any questions. And if you believe that misconduct has occurred or may occur, please report it right away. We will follow up on any reports received, and we absolutely prohibit retaliation against employees for making a good faith report.

Thank you for taking the time to review this Code and for helping Harvest grow to greatness.

Steve White  
Chief Executive Office

## Our Mission

**We are building the most valuable and impactful cannabis company in the world. We are bravely shaping our industry, with a commitment to creating great products that improve the health of our customers.**

## Our Values

Our Values are a critical part of who we are as a company. They are a commitment that we make to each other, to our customers, to our business partners, and to the communities where we operate.

Impactful	Genuine	Dedicated	Accountable
<ul style="list-style-type: none"><li>• We impact people in a way that improves their lives</li><li>• We make a difference in and forge relationships with each community we serve</li><li>• We are all connected. What we each bring to the Harvest team is an integral part of our ultimate success</li></ul>	<ul style="list-style-type: none"><li>• We communicate truthfully and in a way that fosters growth and potential</li><li>• We are principled and ethical</li><li>• We are the same people in all circumstances, sharing humor, having fun, and building trust</li></ul>	<ul style="list-style-type: none"><li>• We are brave in our pursuit of shaping the cannabis industry</li><li>• We respectfully challenge the status quo</li><li>• We are firm in our determination to shift conversations and open minds</li><li>• We endure and are successful through resilience and perseverance</li></ul>	<ul style="list-style-type: none"><li>• We believe the safety and integrity of our products is upheld through accountability to our process</li><li>• We are a company of integrity; therefore, we hold ourselves and one another accountable to the highest standards</li><li>• We are accountable for continual improvement of Harvest, its products, and its people</li></ul>

## Our Code

In business, as in other aspects of our lives, ethical behavior doesn't just happen. It must be nurtured and cultivated. The Code is one of the ways that Harvest does that. The Code applies to every employee of Harvest and of our subsidiaries, as well as to the members of our Board of Directors.

It would not be possible to spell out every possible ethical scenario or legal question we might face as Harvest employees. Instead, we rely on each other's good judgment to live by Harvest Values and ask questions when uncertain. This Code is your guide to doing business the Harvest way. Please use it!

### Responsibilities of All Employees

We each play an important role in ensuring that Harvest complies with the law and that we uphold Harvest's Values. We must commit to the following:

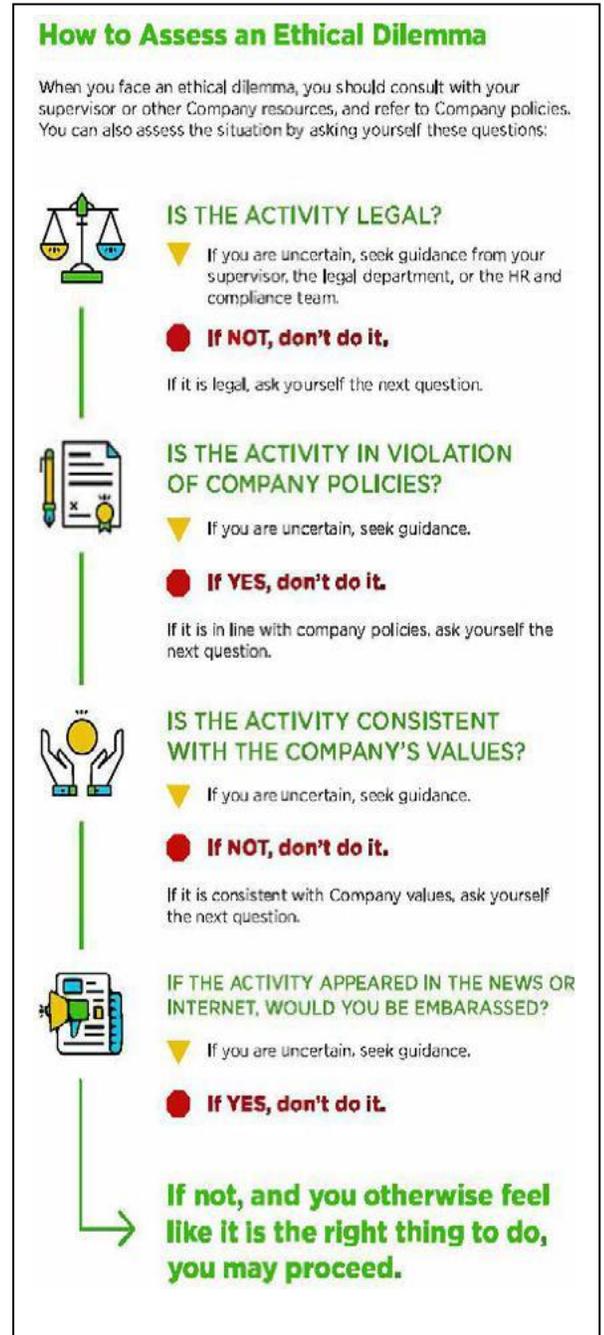
- **Read and understand** this Code and the Harvest policies that apply to your job.
- **Comply** with applicable law, this Code and Company policies.
- **Support other employees** in doing business in accordance with Harvest's Values.

- **Seek guidance** if you are uncertain as to the right way to proceed or you need help with any of the topics addressed in this Code.
- **Speak up!** Report known or suspected violations of the Code, the law, or Company policies to your manager, the Helpline, or the other resources identified in the Code.
- **Cooperate** in Company investigations, audits and other reviews.

### Responsibilities of Managers and Leaders

As a Harvest manager or leader, you have a special obligation to demonstrate Harvest’s Values and to support our employees in understanding their compliance obligations and conducting business with integrity. Harvest managers and leaders must commit to the following:

- **Be a role model.** Set an example of doing business in accordance with Harvest’s Values. Never encourage or direct any employee to achieve a business result at the expense of violating our Code or Values.
- **Support a culture of compliance and ethics.** Encourage employees to refer to the Code; ensure that those with whom you work are familiar with the policies that apply to their jobs; support the Company’s compliance training and communications; and assist in implementing compliance and ethics initiatives in your area.
- **Listen and offer guidance.** Be available to employees who come to you to raise concerns and ask questions. Assist employees in making ethical decisions.
- **Take action and monitor for retaliation.** If you become aware of suspected misconduct, refer the matter to the Compliance Department, Human Resources or another appropriate resource. Monitor for retaliation against employees who report suspected misconduct or cooperate in investigations.
- **Consider compliance.** Consider employees’ commitment to compliance and Harvest Values when evaluating and rewarding employees, and help employees understand that business results are never more important than ethical conduct.



## Reporting Concerns

If you believe that something is not right at work or that it may violate our Code, our Values or the law, report it.

### The Compliance Team

- Telephone: (480) 581-1177
- E-mail (Compliance Team): [compliance@harvestinc.com](mailto:compliance@harvestinc.com)
- Email (Terressa DeHaven, Chief Compliance Officer): [tdehaven@harvestinc.com](mailto:tdehaven@harvestinc.com)

### The Human Resources Team

- E-mail: [hrreport@harvestinc.com](mailto:hrreport@harvestinc.com)

### The Harvest Helpline

In addition to the many other resources listed in this Code, you can also report suspected misconduct or seek guidance by contacting the Harvest Helpline in the following ways:

- Website: [www.lighthouse-services.com/harvestinc](http://www.lighthouse-services.com/harvestinc)
- Toll-Free Telephone:
  - English speaking USA and Canada: 833-310-0077
  - Spanish speaking USA and Canada: 800-216-1288
  - Spanish speaking Mexico: 01-800-681-5340
  - French speaking Canada: 855-725-0002
  - Contact us if you need a toll-free # for North American callers speaking languages other than English, Spanish or French
- E-mail: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)
- Fax: (215) 689-3885 (must include company name with report)

You can contact the Helpline anonymously. However, please keep in mind that the more information you provide, the easier it will likely be to investigate and respond to the concern.

### What Happens When You Report a Concern

Reports of suspected misconduct will be appropriately investigated and treated confidentially to the extent possible in light of Harvest's need to conduct an investigation and follow up on any concerns. You are expected to cooperate in internal investigations. You should never conduct your own investigations, even if you are in a management position, without prior consultation with the HR and Legal teams. Investigations often involve complex legal issues and acting on your own may compromise an investigation.



## Our Anti-Retaliation Policy

Harvest relies on employees to let us know if they suspect misconduct. **We prohibit retaliation against employees for making a good faith report of suspected misconduct or for cooperating in an investigation.** If you are aware of retaliation (against you or another employee), report it right away. Harvest will investigate and take appropriate action. Retaliating against an employee for making a good faith report or for cooperating in an investigation violates our policies and our Values, and it will result in appropriate disciplinary action.

## We Hold Each Other and Ourselves Accountable

Accountability is one of Harvest's four Values. We hold ourselves and one another accountable to the highest standards – including the highest standards of compliance and business ethics. Company personnel who violate this Code and other Company policies may be subject to disciplinary action, up to and including termination. In addition, managers who, through lack of diligence or supervision, fail to prevent or report violations may also be subject to discipline.

## We Comply with Applicable Laws and Regulations Governing our Industry

Harvest is located in a number of states, and we are expanding to new locations and possibly new countries all the time. The legal and regulatory landscapes in which we operate are extremely challenging. In order to achieve our mission of being the most valuable and impactful cannabis company in the world, we *must know and comply* with the laws and regulations that apply to our business. If you are unclear about what a law or regulation requires, contact the Compliance Department.

### Compliance with State and Local Licensing Requirements

Because Harvest operates in an industry that requires that we have licenses and permits to operate, maintaining compliance with statutory requirements governing those licenses is critical to our ability to do business. Local laws and regulations govern how we can grow and manufacture our products, how and to whom we sell our products, how we can market our products, and other aspects of our business. We must ensure that our conduct is consistent with legal requirements and does not threaten our licenses, which are at the heart of our company's value.

### Product and Regulatory Compliance

Part of Harvest's Value of Accountability includes a commitment to the safety and integrity of our products. We can best safeguard our products by complying with Harvest procedures and processes that have been designed to ensure the safety and quality of everything that we produce. We comply with all product safety and quality requirements.

### Promotional Materials and Interactions with Healthcare Professionals

We are committed to the highest standards of integrity in our promotional practices and our interactions with healthcare professionals and the public. All promotional materials and communications must be accurate and compliant with applicable regulatory requirements. We do not bribe government officials, healthcare professionals or customers, and we comply with Company policy and the law in providing promotional material, including but not limited to samples.

## We Take Care of Each Other

### Workplace Health and Safety. Own It.

At Harvest, we take care of each other and keep each other safe. Follow the safety guidelines in place at each of our locations and promptly notify managers or other appropriate resources when you become aware of safety incidents or hazards. Safety is owned by every employee at every site.

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For more, see the Safety and Well-being section of the Employee Handbook.

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### Workplace Violence

Harvest is committed to a violence-free work environment. We will not tolerate violence or the threat of violence in the workplace. Under no circumstances should anyone bring a weapon into the workplace. If you become aware of a violation of this policy or in cases of potential violence, contact Harvest's National Director of Security at 301-331-7219. Threats or assaults that require immediate attention should be reported to the police at 911.

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For more, see the Workplace Violence Prevention section of the Employee Handbook.

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### Drugs and Alcohol at Work

While we at Harvest are firm believers in the goodness of cannabis, we are also firm believers in maintaining a safe workplace. You should never use cannabis, alcohol, or any other substance during working or non-working hours in a way that could lead to impaired performance or inappropriate behavior at work or that endangers the safety of others.

Under no circumstances will lawful cannabis use be permitted during work or non-working time if it compromises safety in the workplace or causes loss of monetary or licensing benefits under applicable law or regulations. If you are lawfully under the influence of cannabis or over-the-counter medication that may impair your ability to perform your job in a safe and effective manner, you must advise your manager or Human Resources of that fact, and the precise type, dosage and strength of medication involved, before reporting for work.

Being impaired when you are driving or using machinery at work may lead to immediate termination. And being arrested for illegally selling drugs of any kind may also result in immediate

termination. Our priority is to assure that employees can perform their duties at work safely and efficiently.

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For more, see the Substance Abuse Prevention section and/or Drug Free Workplace section in the Employee Handbook

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## **We Value Inclusion and Treat One Another with Respect**

### **We Respect Each Other and Value Diversity and Inclusion**

We are firmly committed to creating a culture of mutual respect and a workplace where we each feel we belong and are valued. One of the important parts of our Value of Impactful is the recognition that we are all connected, and what we each bring to the Harvest team is an integral part of our ultimate success. Our diversity provides a key competitive advantage, and it is a clear and strong representation of who we are. As we continue to expand our operations, diversity and inclusion are essential to maintaining our success.

### **No Discrimination. No Harassment.**

We are committed to a supportive work environment, where employees have the opportunity to reach their potential. To ensure equal employment and advancement opportunities to all employees and applicants, our employment decisions are based on merit, qualifications, and abilities. We do not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, pregnancy, family care status, national origin, ethnicity, age, disability, genetic information, veteran status, military service obligation, lawful cannabis use, sexual orientation or gender identity, reporting a work-related injury or illness or any other legally protected classification. This policy governs all aspects of employment, including selection, job assignment, promotion, compensation, discipline, termination, and access to benefits and training.

Harvest also prohibits sexual and other forms of harassment. Please promptly report any incidents of discrimination or harassment to your manager, Human Resources, the Compliance Department or any of the other resources set forth in this Code.

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For more, see the [Equal Employment Opportunity/Reasonable Accommodation and Prohibiting Harassment](#) sections in the [Employee Handbook](#).

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## We Appropriately Handle Conflicts of Interest

As Harvest employees, we must act in Harvest's best interest, independent of outside influences. A conflict of interest occurs when your personal, financial, or family interests or relationships interfere, or may appear to others to interfere, with your ability to perform your work for Harvest objectively and effectively. Situations that may involve conflicts of interest must be promptly disclosed to the Human Resources or the Legal Department. The Company will then determine whether a conflict exists and, if so, what steps should be taken to address it.

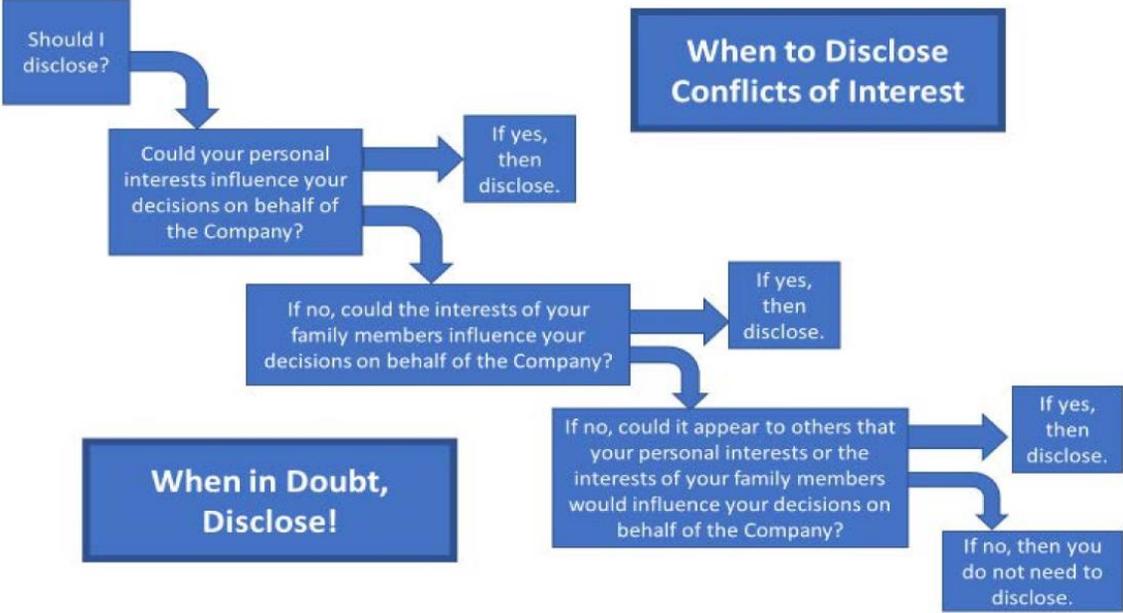
What follows are some examples of situations that may create conflicts and must be disclosed:

- **Financial interests** in companies that do or seek to do business with Harvest, including suppliers and clients, or in our competitors. Conflicts are most likely to occur where you have an investment in a competitor, supplier or client, and your decisions on behalf of Harvest could impact (or have the potential to impact) the third party's relationship with Harvest or benefit the third party.
- **Employment** with, being a consultant to, or receiving an honorarium from a Harvest competitor, client, partner or supplier.
- **Directing Harvest's business to a supplier** when the supplier is owned or managed by members of your family or close friends. If you make purchasing decisions on behalf of Harvest, you must disclose your relationships with any existing or potential suppliers.
- **Accepting gifts or entertainment from suppliers or other business partners.** If acceptance could create an obligation on your part or influence your decisions on behalf of Harvest, or if acceptance could create the perception of obligation or influence do not accept the gift.
- **Corporate opportunities**, meaning taking personal advantage of a business opportunity that you became aware of because of your work at Harvest. Those opportunities belong to Harvest in the first instance and should not be pursued by you personally (or shared with other individuals) without first disclosing the opportunity to the Legal Department and obtaining pre-approval.
- Hiring, evaluating, promoting or supervising **anyone who you have a personal relationship with, including a familial or romantic relationship.**
- **Serving on the board of directors or other advisory body** of an organization that is a competitor, client, partner or supplier of Harvest. Additionally, because board seats involve fiduciary obligations that can make them particularly complicated from a conflict of interest perspective, you must obtain permission from the General Counsel or Chief Financial Officer before you accept a board seat with any outside organization.

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For more, see the Conflicts of Interest, Outside Employment or Work Activities, and Personal Relationships in the Workplace sections in the Employee Handbook

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## We Protect Information and Privacy

### Protecting Privacy

We care about the privacy of our customers and employees. Protect all customer and employee data and information as if it were your own. Never disclose customer or employee data outside of Harvest, unless for an authorized business purpose, without express permission from the IT, HR or Legal team, and do not disclose private information even to fellow Harvest employees unless they are authorized to receive the information and have a business need for the information.

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For more, see the [Protection of Private Information](#) and [Protecting our Assets and Information](#) sections in the Employee Handbook.

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#### SOME EXAMPLES OF PRIVATE INFORMATION:

- → Social security and other government identification numbers
- → Prescription and other medical information
- → Email addresses
- → Telephone numbers
- → Home addresses
- → Credit card information
- → Consumer credit or background check information
- → Names and other information regarding family members

### Protection of Confidential Information and Intellectual Property

We all have a responsibility to safeguard Harvest information and the confidential information of our employees, clients, and other business partners. Confidential information includes all non-public information that might be of use to competitors, or harmful to Harvest or its clients or other third parties, if disclosed. Examples of confidential information include:

- Non-public financial data
- Trade secrets and know-how
- Acquisition and divestiture opportunities
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- Client and supplier lists
- Marketing plans

We do not disclose Harvest's, our clients' or our business partners' confidential information to anyone within or outside of the Company unless the recipient is an employee who needs the

information to perform work responsibilities or is an outsider who has been authorized by management to receive the information.

Your obligation to treat information as confidential continues after your employment with Harvest ends. You also may not disclose your previous employer's confidential information to Harvest. In addition, we do not use illegal or unethical means (such as theft, spying or misrepresentation) to obtain confidential information.

In addition to respecting confidential information belonging to Harvest or others, we also respect and protect the intellectual property of Harvest and of other companies. You have an obligation to not violate patents, copyrights, trademarks and other forms of intellectual property, and take appropriate steps to protect intellectual property. If you have questions about intellectual property, consult the Compliance Department.

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For more, see the [Confidential Information Protecting our Assets and Information](#) sections in the [Employee Handbook](#) and the [Inventions Assignment Agreement](#).

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### [Representing Harvest with the Press, in Public, and in Social Media](#)

Our communications about Harvest with the media, analysts, and regulators should always be accurate. Employees may not speak with the press, analysts or regulators on behalf of Harvest or as a Company representative unless expressly authorized to do so. Media inquiries should be sent to the Head of Corporate Communications for response, and investor inquiries should be sent to the Director of Investor Relations.

Never use social media to discuss or disclose any confidential Harvest information or confidential information regarding our employees, customers, or other business partners.

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For more, see the [Social Media](#) section in the [Employee Handbook](#) and [Media Relations Guidelines on the Learning Management System \(LITT\)](#).

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## **We Keep Our Technology Secure and Protect our Resources**

### Cybersecurity

We must comply with all Harvest policies when using the Company's computer and technology resources. It is extremely important that you take all necessary measures to secure your computer and other Harvest technology. If you have any reason to believe that the security of electronic data or a Company computer or communication resource has been compromised, report the incident to the Information Technology Department immediately.

All personal files stored on Harvest computers are Company property. To the extent permitted by applicable law, the Company may review any files stored or transmitted on its computer and technology resources, including e-mail messages.

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For more, see the [Internal Communications and Information Access](#) content in the [Employee Handbook](#).

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### Protection of Harvest Assets

We are all responsible for protecting Harvest's assets, including our products, facilities, property and equipment, computers and information technology systems, and our funds. Be conscientious and act appropriately to ensure company assets are not damaged, misused, lost or stolen. Employees must not leave any Harvest assets in personal vehicles or in any other location that makes Harvest assets and property vulnerable to theft, damage, or misuse.

## **We Comply with Insider Trading Laws**

You must not buy or sell Harvest securities when you possess material nonpublic information about the Company. This is known as “insider trading,” and it is illegal. Passing such information on to someone who may buy or sell securities – known as “tipping” – is also illegal. The prohibition applies to Company securities and to securities of other companies if you learn material nonpublic information about other companies (such as Company suppliers), in the course of your duties for Harvest.

Material information is information that an investor would think important in deciding whether to buy or sell a security. Examples include financial results, new or lost contracts or products, sales results and important personnel changes.

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For more, see [Harvest’s Insider Trading Policy on the Learning Management System \(LITT\)](#)

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## **We Maintain Accurate Business and Financial Records**

At Harvest, we prepare all Company documents accurately, truthfully, and in a timely manner. One of our four Company Values is that we be Genuine, which requires that we communicate truthfully and in a way that fosters growth and potential. We also make full, fair, accurate, timely and understandable disclosures in reports and documents that we file with government regulators, including periodic financial reports, and in other public communications. Never make false or misleading entries in Company records. Never omit information from our records that is required to be recorded. Like all Company records, expense reports and time keeping records must also be accurate.

If you learn of a subpoena or a pending or contemplated litigation or government investigation, you should immediately contact the Compliance Department. You must retain all records that may be responsive to the subpoena or relevant to the litigation or investigation until you are advised by the Legal Department as to how to proceed.

### **Signing a Contract**

Do not sign an agreement on behalf of Harvest unless you have the authority to do so and you have received the appropriate approvals, including from the Compliance Department. If you have questions about contract authority, consult the Finance or Compliance Department.

## **We Comply with Antitrust Laws and Deal Fairly with Others**

### Fair and Honest Dealing

One of our four core Values at Harvest is that we are Genuine. This means that we are truthful, principled and ethical in the way that we deal with others. We deal fairly with our clients, suppliers, competitors, employees, regulators, and everyone else. We are honest and forthright. We do business with integrity.

### Antitrust Compliance

While the Company competes vigorously in all of its business activities, its efforts in the marketplace must be conducted in accordance with applicable antitrust and competition laws. Some of the most serious antitrust offenses are agreements between competitors that limit the independent judgment of a company, such as agreements to fix prices, restrict output, affect the quality of products, boycott certain suppliers or divide a market for clients, territories or products. You should not agree with any competitor on any of these topics, as these agreements are virtually always unlawful.

## We Deal Fairly with Government Officials

### Political Activities

A big part of who we are as a Company is our mission to shape a new industry, which requires that we interact with legislators and regulators who may not fully understand the goodness of cannabis. We participate in the political process in order to help governments understand issues that are important to our industry. We are committed to compliance with the laws and regulations governing contributions to and interactions with governments and government officials.

In order to ensure compliance with the complicated laws and regulations that apply in this area, employees may not give or offer Company funds or assets (including employee time or use of Company facilities) as a political contribution without obtaining pre-approval from the Legal Department. In addition, you may not seek to influence legislative or administrative action on behalf of Harvest without first obtaining approval from the Legal Department.

### Anti-Bribery

At Harvest, we work hard to contribute in a positive way to the communities where we do business. Indeed, one of our four Values, Impactful, means in part that we make a difference in and forge relationships with each community we serve. Bribery is illegal and hurts communities and innocent people. At Harvest, we do not bribe government officials – or anyone else.

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For more, see [Harvest's Anti-Bribery Policy](#)

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### Gifts and Entertainment to Government Officials

It may be permissible to provide small business courtesies, such as reasonably priced meals that are eaten during business discussions, to government officials. However, the laws in this area are complex, and they vary from government to government. In order to ensure compliance, you must obtain advance approval from the Legal Department before providing a government official with a meal, gift, entertainment, travel expenses or any type of business courtesy. You must also keep accurate records of such expenditures.

## **We are Socially Responsible**

### Sustainable Business Practices

At Harvest, we care about protecting the environment. We comply with applicable environmental laws, and we are committed to continuous improvement of our environmental practices.

### Human Rights

Our value of being Impactful means, in part, that we make a difference in and forge relationships with each community we serve. This includes a deep respect for the human rights and dignity of people throughout our Company and in the communities where we operate. Harvest does not tolerate the use of forced or child labor or human trafficking. We also work to ensure that our suppliers and other business partners operate in accordance with these same high standards.

## **We Comply with Trade Laws**

Harvest is subject to numerous laws and regulations governing how we import and export products from the countries where we do business. We are also subject to laws that prohibit us from doing business in some countries or with certain individuals or organizations. Harvest is firmly committed to compliance with U.S. and other applicable trade laws and economic sanctions.

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For more, see [Harvest's Anti-Trust Policy](#)

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## **No Rights Created**

The Code does not alter the terms or conditions of your employment with Harvest. It does not constitute an employment contract or an assurance of continued employment. In addition, the Code is not intended to and does not create any obligations to or rights in any employee, customer, supplier, competitor, shareholder or any other person or entity.

## Acknowledgement Form

I have received and read the Code of Business Conduct, and I understand its contents. I agree to comply with the standards contained in the Code and the Company's related policies and procedures. I understand that I have an obligation to report any suspected violations of the Code that I am aware of. I acknowledge that the Code is a statement of policies for business conduct and does not, in any way, constitute an employment contract or an assurance of continued employment.

I understand that my signature below and/or my electronic signature submitted through the Company's electronic document management system signifies that I have received and read a copy of the Code of Business Conduct and understand my rights and responsibilities as an employee. I further understand that my signed or electronic acceptance and return of this acknowledgement form is a condition of my employment or continued employment.

Employee Name (type or print): \_\_\_\_\_

Employee Signature (type or sign): \_\_\_\_\_

Date: \_\_\_\_\_