

JOHN P. KUMMER GROUP – CODE OF CONDUCT AND BUSINESS ETHICS

The John P. Kummer Group places a high standard on the integrity of our company and in our directors, officers, employees, and representatives. Our reputation is the cornerstones of our business. It is our policy to comply with all governmental laws, rules and regulations applicable to its business and of the countries in which we operate. All of our employees and representatives are expected to follow this policy, and adhere to our Code of Conduct and Business Ethics. The Group has no production facilities, it is a Distributor Organization

BUSINESS:

- ✧ The John P. Kummer Group maintains true and fair business, financial and employment practices.
- ✧ The highest standards of integrity are to be upheld in all business interactions. We have a zero tolerance policy that prohibits any and all forms of bribery, corruption, extortion and embezzlement.
- ✧ Directors, officers, employees and representatives are to avoid any activities that conflict or appear to conflict with their job responsibilities or the interests of the Company. Never solicit or accept any form of bribe or gift in exchange for favorable treatment or financial gain.
- ✧ We have appropriate policies in place to safeguard our own proprietary information and intellectual property as well as that of our customers, principals, other business associates and suppliers. All records and books of account are at all times to reflect the true nature of the transactions they record.
- ✧ We follow all applicable trade laws which include import and export control laws.
- ✧ We practice mutual, respectful and open communications between the Company, Management and employees.
- ✧ Access is always available to all employees with respect to Company policies, employee and safety manuals, employee benefits information and workplace procedures.
- ✧ Grievance Procedure – all employees are instructed and encouraged to report any violation of our commitment to true & fair financial, business and employment practices to their manager or other management personnel without fear of retribution.
- ✧ A program to protect the privacy and personal information of our employees has been implemented.

EMPLOYEES:

- ✧ Employees of the John P. Kummer Group are expected to:
 - Take pride in their work and enjoy providing their very best effort.
 - Perform their jobs efficiently, safely and in a professional manner.
 - Act with honesty, integrity and accountability inside and outside of the workplace.
 - Communicate pleasantly and respectfully with other employees at all times
 - Treat our customers, suppliers and representatives, with respect
 - Follow all applicable laws & regulations
 - Follow all Company policies outlined in this Code of Conduct and Business Ethics
 - Protect the privacy and Personal Information of others. A program to protect the privacy and personal information has been implemented
 - Protect the Intellectual Property of the Company
 - Exercise good judgment and integrity when using company equipment including but not limited to electronic communication systems such as computers, internet access, email etc.

COMPANY AND EMPLOYEE RELATIONSHIPS:

- ✧ The John P. Kummer Group is an Equal Opportunity Employer - we provide equal employment opportunity without regard to race, color, sex, age, disability, religion, national origin, marital status, sexual orientation, ancestry, political belief or activity.
- ✧ We comply and follow all applicable Employment and Wage & Hour Laws
- ✧ We believe in providing a healthy, safe and positive workplace. Training and companywide discussions are held to affirm our company policies on:
 - zero tolerance regarding discrimination, harassment or dangerous personal behavior
 - zero tolerance regarding substance or alcohol abuse
 - maintaining a violence-free organization
 - following safe work practices
- ✧ We provide our employees with opportunities for job training and enhancement.

CUSTOMER RELATIONSHIPS:

- ✧ The John P. Kummer Group treats all customers in a professional, courteous and respectful manner.
- ✧ Customer satisfaction is our goal:
 - We provide support and information through our Technical Personnel, through our Customer Service Department and on our website – www.jpnummer.com.
 - We respond to orders and questions promptly, provide businesslike replies to inquiries and requests, and perform all duties in an orderly manner.
 - We maintain strong working relationships with our customers and our principals.
 - We take great care to protect all customer information with strict adherence to Non-Disclosure Agreements in addition to employee training regarding confidentiality and the European General Data Protection Regulation (GDPR).
 - We provide accurate and honest pricing.
 - We maintain accurate and honest billing practices.
 - The Terms & Conditions of our sales are included with each order confirmation.

PRINCIPAL RELATIONSHIPS:

- ✧ We build long-term relationships with our Principals.
- ✧ We maintain direct business relationships with either the Original Manufacturer or their Authorized Distributor.

COMMUNITY /ENVIRONMENTAL RELATIONSHIPS:

- ✧ The John P. Kummer Group maintains a strong belief in sustainability by supporting our workplace, employees, community and the environment around us.
- ✧ We provide buildings and offices that are attractive, comfortable, orderly, safe and secure.
- ✧ We comply with international trade laws & regulations.
- ✧ As a Distributor Organization, the Group has no manufacturing operations.