

Pioneer Machine & Tool Company (PMT) Code of Conduct

The PMT Code of Conduct outlines expected behaviors for all PMT employees. PMT will conduct its business fairly, impartially, in an ethical and proper manner, in full compliance with all applicable laws and regulations, and consistent with PMT values. In conducting its business, integrity must underline all company relationships, including those with customers, suppliers, and communities and among employees. The highest standards of ethical business conduct are required of PMT employees in the performance of their company responsibilities. Employees will not engage in conduct or activity that may raise questions as to the company's honesty, impartially, reputation or otherwise cause embarrassment to the company. As an employee of PMT, I will ensure that:

- I will not engage in any activity that might create a conflict of interest for me or the company.
- I will not take advantage of my PMT position to seek personal gain through the inappropriate use of PMT or non-public information or abuse my position. This includes not engaging in insider trading.
- I will follow all restrictions on the use and disclosure of information. This includes following all requirements for protecting PMT information and ensuring that non-PMT proprietary information is used and disclosed only as authorized by the owner of the information or as otherwise permitted by law.
- I will observe fair dealing in all of my transactions and interactions.
- I will protect all company, customer and supplier assets and use them only for appropriate company-approved activities.
- Without exception, I will comply with all applicable laws, rules, and regulations.
- I will promptly report any illegal or unethical conduct to management.

Every employee has the responsibility to ask questions, seek guidance and report suspected violations of the Code of Conduct. Retaliation against employees who come forward to raise genuine concerns will not be tolerated.