

Accupac Ethics Policy

At Accupac, we are committed to an ethical workplace where integrity is part of all that we do. Accupac conducts business ethically, honestly, and in full compliance with the law. We believe that how we conduct ourselves is critical to Accupac's success. Accupac is committed to fair business practices and does not restrict competition, maintain, or increase relative market position in an abusive or dominant way.

Our Standards of Conduct and associated policies are foundational to how we do business and how we put our values into practice every day. This policy applies to all Accupac directors, officers, and employees (referred to hereafter as "Employees"), as well as all suppliers of goods and raw materials, distributors, contractors, consultants, agents, and other service providers (referred to hereafter as "Vendors").

Corruption and Anti-Bribery Policy

Accupac is committed to ethical business practices and acting with integrity in all aspects of business. We expect all Accupac Employees to act in accordance with Accupac's Standards of Conduct, and all applicable laws and regulations.

Accupac's business depends not only on its conduct but also on the conduct of those with whom it does business. Therefore, Accupac's goal is to ensure that all its Vendors reflect the same high ethical standards as Accupac and demonstrate a commitment to compliance with all laws governing their activities, including laws prohibiting bribery or corruption.

All Accupac Vendors and Employees must commit to the Foreign Corruption Practices Act (FCPA) and anti-bribery compliance as set forth below:

- A. Our Vendors and Employees are aware that anti-bribery and anti-corruption laws around the world generally prohibit bribery of governmental officials and among private commercial parties, including the giving or receiving of bribes in connection with conducting business. More specifically, these laws prohibit people and organizations, or those acting on their behalf, from:
 - paying or offering to pay money or anything of value, directly or indirectly, to (A) a government official to influence that official to secure an improper advantage or obtain or retain business, or (B) any private person or organization to induce any person to improperly perform a function or activity in connection with a business or organization, a person's employment, or a public function;
 - requesting, agreeing to receive, or accepting a financial or other advantage in exchange for improper performance of a function or activity in connection with a business or organization, a person's employment, or a public function.

B. Our Vendors and Employees will not undertake any action that would cause them, or Accupac, to be in violation of any anti-bribery laws, nor have they been accused of conduct that would violate any anti-bribery laws.

C. Our employees understand that it is their responsibility to comply with this Corruption and Anti-Bribery policy.

D. Our Vendors understand that it is their responsibility to ensure that all parties understand and comply with this Corruption and Anti-Bribery Policy.

Our Vendors and Employees understand that failure to adhere to this FCPA and Anti-Bribery Policy may cause Accupac to terminate relevant contracts.

In addition to the FCPA principles above, Employees and Vendors are prohibited from engaging in the following behaviors:

- Acts of dishonesty, fraud, theft, or sabotage
- Money laundering- Concealing the origin, ownership, or destination of illegally or dishonestly obtained money by hiding it within legitimate economic activities to make them appear legal.

Conflict of Interest

All employees have an obligation to conduct business in a way that prevents actual or potential conflicts of interest. The purpose of these guidelines is to provide general direction so employees can seek further clarification on issues related to the subject of acceptable standards of operation.

Transactions with outside firms must be conducted within a framework established and controlled by the executive level of Accupac. Business dealings with outside firms should not result in unusual gain from those firms. "Unusual gain" refers to bribes, product bonuses, special fringe benefits, unusual price breaks and other windfalls designed to ultimately benefit the Company and/or employees. Promotional plans that could be interpreted to involve unusual gain require specific executive-level approval.

An actual or potential conflict of interest occurs when employees are in a position to influence a decision that may result in personal gain for an employee, or a relative, as a result of Accupac's business dealings. For the purpose of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

No presumption of guilt is created by the mere existence of a relationship with outside firms. However, if the relationship allows influence on transactions involving purchases, contracts, or leases, it is imperative it is disclosed to an officer of Accupac as soon as possible to investigate the existence of any actual or potential conflict of interest and establish safeguards to protect all parties.

Ethics Hotline, Whistleblowing Policy, and Non-Retaliation

Our Ethics Hotline allows employees and external stakeholders to confidentially report inappropriate behavior, fraud, unlawful, and unethical behavior. Reporting ethics concerns is important, and this hotline is intended to provide a way for employees to raise issues without concerns about retaliation.

The Ethics Hotline is accessible by website (www.lighthouse-services.com/accupac) or by phone 1-855-222-3644.

This hotline provides an avenue for employees to raise concerns with reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith. Harassment or victimization of individuals submitting hotline reports will not be tolerated. Any employee who engages in retaliation or threats of retaliation will face disciplinary action, including potential termination of employment.

All reports can be made anonymously through the hotline. All concerns submitted will be investigated with consideration given to seriousness of the issue raised, credibility of the concern, and likelihood of confirming the allegation. If you have any questions about the ethics hotline or whistleblowing policy, please see your HR representative.

Conclusion

Occurrences of any violations of this policy may result in immediate dismissal or contract termination without warning.

This policy is reviewed annually by the Chief Human Resource Officer and revised as needed to ensure all requirements and expectations remain relevant to all applicable laws and best practices.

For more information on this program, or questions regarding this policy, contact the Chief Human Resources Officer.