

# Code of Ethics

## I. Message From the CEO

At City Plating and Metal Finishing, we understand our reputation is based on the conduct, integrity, and abilities of each team member in our organization. We base operations on the belief ethics is the foundation of a successful business. Every decision we make is guided by our commitment to conduct business within the highest safety and ethical standards. All our employees share in placing the utmost importance on conducting themselves in accordance with applicable laws, regulations, and policies.

Careful review of this policy will provide colleagues with a better understanding of their individual obligations as well as the organizations expectations. Compliance with this policy is mandatory. All employees are responsible for familiarizing themselves with the legal standards and policies applicable to their assigned duties and conducting themselves accordingly. Violations of this policy are subject to discipline, up to and including termination.

## II. Compliance with Laws and Ethical Business Conduct

City Plating recognizes public interest as a permanent commitment in the conduct of its business. In performing duties, each employee has a responsibility to serve the company in a manner they believe, in good faith, to be in the best interest of the organization and its stakeholders. The activities of the company must always be in compliance with applicable laws, statues, policies, and regulations.

City Plating depends on its reputation for quality, service, and integrity. The way we deal with our customers establishes that reputation and builds the long term-trust that ultimately determines our success. All employees must deal fairly with our customers and each other. We, as a company, must never take unfair advantage of others through concealment, manipulation, misrepresentation of facts, or any other unfair dealing.

Employees are reminded; however, their first duty is in regard to the best interests of the organization. Accordingly, certain types of information, such as pricing and potential projects, should not be exchanged with competitors. This information must be protected regardless of how innocent or casual the exchange and regardless of the setting.

### III. Record Keeping and Retention

Accurate record keeping is vital to enabling the company to comply with legal and regulatory requirements, manage organizational affairs, and provide the best possible service to our customers. Employees will ensure records are dependable, retrievable, and compliant. Information contained on records will not be misstated or have material information omitted. Records will attempt to disclose the true nature of every interaction and will not be forged, falsified, or seek to disguise potential procedural shortcomings.

City Plating will maintain all required records and information in accordance with laws, regulations, statutes, and policies.

### IV. Health and Safety

The safety of our employees and the public is our highest priority. Our organization will identify and mitigate all potential public safety hazards associated with our activities. Appropriate public engagement and communication shall be undertaken to ensure no hazardous exposure to the public.

Employees of City Plating will work safely and in compliance with all applicable safety rules, laws, standards, and procedures. Hazards will be eliminated or controlled through proper design, engineering, controls, and safety training. All staff will be provided with appropriate and well maintained personal protective equipment and required training.

### V. Violations of Policy

Violations of this policy will be grounds for discharge or other disciplinary action, based on the circumstances of the violation. It is the organizations policy to encourage employees to come forward with any safety, ethical, or legal concerns. Retaliation against those who bring forward these types of related concerns or complaints will not be tolerated.

### VI. Employees should understand that they have the right to:

Report possible violations of state or federal law or regulation that have occurred, are occurring, or are about to occur to any governmental agency or entity, or self-regulatory organization.

Cooperate voluntarily with, or respond to any inquiry from, or provide testimony before any

self-regulatory organization or any other federal, state or local regulatory or law enforcement authority.

Make reports or disclosures to law enforcement or a regulatory authority without prior notice to, or authorization from, the company

Respond truthfully to a valid subpoena.

Employees have the right to not be retaliated against for reporting, either internally to the company or to any governmental agency or entity or self-regulatory organization, information which they reasonably believe relates to a possible violation of law. It is a violation of federal law to retaliate against anyone who has reported such potential misconduct either internally or to any governmental agency or entity or self-regulatory organization. Retaliatory conduct includes discharge, demotion, suspension, threats, harassment, and any other manner of discrimination in the terms and conditions of employment because of any lawful act. It is unlawful for the company to retaliate against you for reporting possible misconduct either internally or to any governmental agency or entity or self-regulatory organization.

The company cannot require employees to withdraw reports or filings alleging possible violations of federal, state, or local law or regulation, and the company may not offer colleagues any kind of inducement, including payment, to do so.

Date: May 9, 2022

Ralph W. Arnold  
President / CEO  
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