

JCJ Code of Conduct

All employees are expected to read, understand and abide by this Code of Conduct. This Code of Conduct neither promises employment nor creates a right or expectation of employment. This Code of Conduct describes the Company's behavioral expectations for employees, who are required to comply with both the letter and the spirit of this Code of Conduct and of all applicable laws and regulations. Violation of any provision in this Code of Conduct will result in disciplinary action, up to and including discharge, in accordance with applicable policies, procedures, laws, regulations, articles of incorporation, bylaws, handbooks, contracts and collectively bargained agreements.

The Company expects all employees to provide leadership and service to the organization and to make decisions that are honest, consistent with the Company's goals, and free from improper influence or the appearance thereof. This Code of Conduct must be consulted whenever an employee has a question about whether certain conduct is permissible. Employees are expected to use good judgment and to ask for assistance when unsure about the proper course of conduct. If employee has a question about propriety of conduct, he or she must consult with his or her supervisor or other appropriate individual. If employee prefers, he or she may also consult with the compliance department or, if he or she wishes to remain anonymous, may call the Compliance Hotline at 1-800-NOT-ARAT. If employee believes a coworker or supervisor is conducting himself or herself in a manner inconsistent with this Code of Conduct, then he or she must report such incident to the compliance department or the Compliance Hotline at 1-800-NOT-ARAT.

Employer expressly forbids retaliation against anyone who makes such a report, so long as such report is made in good faith and such reporter has not otherwise acted inappropriately. Anyone who retaliates against a reporter who meets these criteria shall himself or herself be subject to discipline, up to and including discharge.

Employees must abide by the following policies of the Company:

- ☆ Confidentiality of Proprietary Information
- ☆ Non-Discrimination
- ☆ Sexual Harassment
- ☆ Antitrust
- ☆ Real and Perceived Conflicts of Interest on the Part of Employee or Family
- ☆ Outside Employment
- ☆ Compliance with Applicable Laws and Regulations

Employee is expected to consult with his or her supervisor for details about each of these policies. For purposes of this Code of Conduct, the term "family" includes an employee's spouse, child, stepchild, spouse of a child or stepchild, parent or stepparent, sibling or stepsibling, spouse of a sibling or stepsibling.

(Scenario Developed by HCCA Work Group)