



Code of Ethics and Conduct

The Company is committed to maintaining the highest standards of business ethics and complying with both the letter and the spirit of the law in everything we do and in every country in which we do business. Doing so will also maintain the hard-earned respect we have established over the years with our customers. Consequently, employees are prohibited from participating in or condoning illegal or unethical activity. Employees who violate the Company's ethical standards will be subject to disciplinary action up to and including termination.

To ensure compliance with this Company policy, we have adopted these Code of Ethics for all employees. These standards also apply to all agents, consultants, contractors and others when they are representing or acting for the Company. We expect our vendors and suppliers to be guided by these principles.

If you have any questions about either the Code of Ethics or the laws that might affect the Company's business, ask your supervisor or contact the General Counsel. Remember, your best resource about what is right or wrong is your own conscience. So, if you find yourself in a difficult situation, think before you act and ask yourself the following questions:

- **Is it illegal?**
If it is not legal, do not do it.
- **Is it wrong?**
If it feels wrong, it probably is wrong.
- **Does it violate Company standards of conduct?**
What would your manager, coworkers or friends say?
- **Would you feel uncomfortable if everyone knew you did it?**
Can you justify your actions to your hometown newspaper?

- **Could it cause loss or harm to you, coworkers, the Company, companies we do business with or the public?**

If you answered "yes" to any of these questions, the action is very likely wrong and you should avoid it. If you are not sure, do not take a chance. One of the most important things you can do is to contact your supervisor, Human Resources, or any of the "Important Resources" shown below to discuss your concerns.

You may safely report suspected illegal or unethical activity through any of the following means:

- To your immediate supervisor;
- To the CEO or CFO of the Company;
- To the Corporate Human Resources department by email at HRPernix@pernixgroup.com;
- To the General Counsel, John Zayed, at 1-630-620-4787 extension 237 or jzayed@pernixgroup.com;
- ComplianceLine (an independent service to which Pernix subscribes). Reporting via ComplianceLine is totally confidential and an employee can report any issues or concerns anonymously.
 - ComplianceLine via telephone – Employees in the USA can call ComplianceLine at 1-844-787-9169. Employees based outside the U.S. call 1-704-916-0592 – available twenty-four (24) hours a day, seven (7) days a week, for employees wishing to remain anonymous.
 - ComplianceLine via website - www.mycompliancereport.com/ and using Access ID: PGP

The surest way to comply with the Code of Ethics is to familiarize yourself with the following information:

GENERAL GUIDELINES

- Conduct all aspects of the Company's business in an ethical and strictly legal manner. Obey the laws, rules and regulations of all localities, states, territories and nations where the Company does or seeks to do business. Remember that even the appearance of misconduct or impropriety can damage the Company's reputation.
- Be responsible for your actions. No one will be excused for misconduct just because it was directed or requested by someone else. Employees, who break the law, even if their intent is to benefit the Company, can be held criminally liable. They risk large fines, attorney's fees, possible jail sentences and the loss of their jobs.
- Be responsible for the conduct of employees reporting to you. In today's environment, supervisors can be held responsible for condoning or negligently failing to take reasonable steps to prevent and detect criminal conduct by their employees. To avoid liability, supervisors must take all reasonable steps to ensure that their employees are familiar with the Code of Ethics and do not participate in criminal activity.

- Conduct yourself with the highest standards of honesty, integrity and fairness when dealing with customers, suppliers, competitors, the general public and coworkers. Do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair business practice.
- Immediately report suspected illegal or unethical activity, including financial fraud and/or accounting matters. The Company does not tolerate retaliation against employees who act in good faith by reporting suspected illegal acts or unethical behavior, and retaliation against those who do can result in corrective action and possible termination.
- Cooperate fully in any investigation of misconduct.

CORE VALUES

Through the years, Pernix has established the reputation of delivering a quality product to its customers. That reputation did not come about by accident. It has resulted from the core values of the Company, as follows:

- **Safety.** This is our highest concern; we adhere to the highest standards and codes, ensure that our workforce is properly trained, and regularly review procedures to guarantee the safety of our workforce, partners and the general public.
- **Customer Satisfaction.** We maintain open communication with our customer base, treat customers with respect, deal with our customers as partners and ensure our vendors and subcontractors understand our values.
- **Reputation.** We safeguard our public image at all costs; we require high ethical standards for all employees; we take swift, decisive and corrective actions in potentially embarrassing situations and we always ensure that our dealings with customers are based on honesty and integrity.
- **Time.** We will not pursue projects that are outside our core competencies; we keep a knowledge database to minimize reinventing the wheel; we seek industry best-in-class processes to improve efficiency and we build a collaborative culture wherein employees respect each other and the customers' time.
- **Performance.** We possess the resources and share a collective commitment to drive peak performance in all of our endeavors.
- **Leadership.** We believe in attracting the best talent and fostering internal leadership to drive innovation that benefits our clients and the communities they serve.
- **Agility.** Through our dynamic global structure we empower our team to respond to challenges and capitalize on evolving business opportunities.

INSIDER TRADING POLICY

It is company policy that no employee may trade in the securities of Pernix, or the securities of any supplier, customer or other company with which the Company has a business or contractual relationship or may be negotiating such a relationship, either personally or on behalf of others, using material, non-public information (also known as “insider information”) or communicate such

information to others who use it to trade in the securities of Pernix or such other company. This conduct is often called “insider trading.” Insider trading is prohibited by law, and breaches of this law are strictly prohibited and may result in severe fines and/or imprisonment. A breach of this Insider Trading Policy is also grounds for disciplinary action, including suspension or termination of employment.

There are special procedures to be followed before you buy or sell Pernix securities. The complete Insider Trading Policy see attached hereto as Appendix E.

FOREIGN CORRUPT PRACTICES ACT

The Foreign Corrupt Practices Act (“FCPA”) prohibits United States companies, their shareholders, directors, agents, officers and employees from the payment or authorization of the payment of any money, or the authorization of the giving of anything of value, directly or indirectly, to a foreign official for the purpose of influencing any act or decision of such foreign official, or inducing such foreign official to use his or her influence to assist the Company in obtaining or retaining business for or with, or directing business to, any person. A “foreign official” is any person acting in an official capacity on behalf of any foreign government, agency, department, or regulatory authority or any instrumentality. Also included in the definition of “foreign official” are foreign political parties, officials thereof and candidates for foreign political office or representatives thereof.

The FCPA does not prohibit certain payments and gifts made to foreign government employees whose duties are essentially ministerial or clerical (a “facilitating payment”), so long as the making of such gifts or payments is legal under the laws of the foreign country.

The FCPA also requires companies whose securities are listed in the United States to meet the FCPA’s accounting provisions. These accounting provisions, which were designed to operate in tandem with the anti-bribery provisions of the FCPA, require corporations covered by the provisions to make and keep books and records that accurately and fairly reflect the transactions of the corporation and to devise and maintain an adequate system of internal accounting controls.

Violations of the FCPA by directors, officers and employees of Pernix is strictly prohibited. Every Pernix employee must be familiar with and observe this policy.

Other countries in which the Company does business may have similar laws to the FCPA. It is the intent of the Company that all employees abide by all applicable laws at all times.

If you are in doubt about the application of this policy you should consult the Chief Financial Officer or General Counsel before proceeding with any transaction.

A. Anti-bribery Provisions

Who

The FCPA potentially applies to *any* individual, firm, officer, director, employee, or agent of a firm and any stockholder acting on behalf of a firm. Individuals and firms may also be penalized if they order, authorize or assist someone else to violate the anti-bribery provisions or if they conspire to violate those provisions.

Corrupt Intent

The person making or authorizing the payment must have a corrupt intent, and the payment must be intended to induce the recipient to misuse his official position to direct business wrongfully to the payer or to any other person. You should note that the FCPA does not require that a corrupt act *succeed* in its purpose. The *offer* or *promise* of a corrupt payment can constitute a violation of the statute.

Recipient

The prohibition extends to corrupt payments to a *foreign official, a foreign political party or party official*, or any candidate for foreign political office. A “foreign official” means any officer or employee of a foreign government, a public international organization, or any department or agency thereof, or any person acting in an official capacity. You should consider using the Department of Justice's Foreign Corrupt Practices Act Opinion Procedure for particular questions as to the definition of a “foreign official,” such as whether a member of a royal family, a member of a legislative body, or an official of a state-owned business enterprise would be considered a “foreign official.”

Business Purpose Test

The FCPA prohibits payments made in order to assist the firm in *obtaining or retaining business* for or with, or *directing business* to, any person. The Department of Justice has interpreted “obtaining or retaining business” broadly, such that the term encompasses more than the mere award or renewal of a contract. It should be noted that the business to be obtained or retained does *not* need to be with a foreign government or foreign government instrumentality.

B. Third-Party Payments

The FCPA prohibits corrupt payments through intermediaries. It is unlawful to make a payment to a third party, knowing that all or a portion of the payment will go directly or indirectly to a foreign official. *The term “knowing” includes conscious disregard and deliberate ignorance.*

Intermediaries may include joint venture partners or agents. The Company encourages and stresses that employees must exercise due diligence and take all necessary precautions to ensure that they have formed a business relationship with reputable and qualified partners and representatives. Such due diligence may include investigating potential foreign representatives and joint venture partners to determine if they are, in fact, qualified for the position, whether they have personal or professional ties to the government, the number and reputation of their clientele, and their reputation with the U.S. Embassy or Consulate and with local bankers, clients and other business associates.

Furthermore, in negotiating a business relationship, employees should be aware of so-called "red flags," *i.e.*, unusual payment patterns or financial arrangements, a history of corruption in the country, a refusal by the foreign joint venture partner or representative to provide a certification that it will not take any action in furtherance of an unlawful offer, promise or payment to a foreign public official and not take any act that would cause the U.S. firm to be in violation of the FCPA, unusually high commissions, lack of transparency in expenses and accounting records, apparent lack of qualifications or resources on the part of the joint venture partner or representative to perform the services offered, and whether the joint venture partner or representative has been recommended by an official of the potential governmental customer.

C. Sanctions

In addition to severe criminal and civil penalties, under U.S. Office of Management and Budget guidelines, a person or firm found in violation of the FCPA may be barred from doing business with the Federal government. *Indictment alone can lead to suspension of the right to do business with the government.* Furthermore, no executive agency may allow any party to participate in any procurement or non-procurement activity if any agency has debarred, suspended or otherwise excluded that party from participation in a procurement or non-procurement activity. In addition, a person or firm found guilty of violating the FCPA may be ruled ineligible to receive export licenses; the SEC may suspend or bar persons from the securities business and impose civil penalties on persons in the securities business for violations of the FCPA; the Commodity Futures Trading Commission and the Overseas Private Investment Corporation both provide for possible suspension or debarment from agency programs for violation of the FCPA; and a payment made to a foreign government official that is unlawful under the FCPA cannot be deducted under the tax laws as a business expense.

D. Private Cause of Action

Conduct that violates the FCPA may also give rise to a private cause of action for treble damages under the Racketeer Influenced and Corrupt Organizations Act, or under similar state or federal laws.

INTELLECTUAL PROPERTY

Simply stated, infringing (*i.e.*, the unauthorized use, misuse or confusingly similar use of) another's intellectual property violates federal and state law. Intellectual property includes patents, trademarks, copyrights and trade secrets. Many employees use the company's and others' intellectual property to conduct and promote the company's business. However, absent specific authorization to do so by the owner of the intellectual property, the company and its employees do not have the right to use another's intellectual property in any manner. Furthermore, misuse or unauthorized use of the company's intellectual property could jeopardize its protection and its value, and could constitute theft of company property.

It is a violation of U.S. copyright laws to share, make or authorize the making of, a copy or adaptation of another's copyrighted material, including books, videos, CDs, MP3 files and computer software (except that one copy of software purchased by the Company may be made for back-up purposes) for purposes of commercial advantage or private gain. Unless the company has been specifically authorized to do so by the owner of the software, the company and its employees do not have the right to reproduce, in any manner whatsoever, third-party software.

In particular, many employees have access to highly confidential proprietary information. This information is known as trade secrets -- formulas, patterns, devices or compilations of information that are used in one's business and that give one an opportunity to obtain an advantage over competitors who do not know or use them. When you joined the Company, you agreed not to use for your personal benefit, or to disclose to others, company trade secrets or other confidential information. Your obligation is a permanent one that continues even after your employment with the Company ends. Family members, friends and, most importantly, future employers are among those with whom you cannot share company trade secrets and other confidential information.

Also, the Company's contracts with customers or vendors may impose obligations of confidentiality for the terms and conditions of those contracts and for information the Company may receive from those parties in the course of performing those contracts. This includes keeping software, source code, or other confidential information relating to company-owned or third-party software confidential from all persons not authorized to receive that information. If you have access to trade secrets, you have an obligation to keep them confidential pursuant to the terms of the Company's contracts.

Employees who, without the consent of the intellectual property owner, use another's intellectual property in an unauthorized manner will be subject to discipline, which may include termination. In addition, individuals who violate the intellectual property laws may be subject to civil and criminal penalties, including fines and prison time. If you have any questions on reproducing intellectual property, please contact John Zayed (General Counsel).

Key Points to Remember:

- Don't make copies of material copyrighted by a third party (such as books, videotapes, audiotapes or computer software) for internal or external distribution or resale without obtaining the copyright owner's prior consent.
- Do not use, alter or copy another's trademarks, including personal images (pictures), without obtaining the trademark owner's prior consent.
- Do not use the Company's trademarks for non-company business without obtaining the Company's prior consent.
- Do not alter the Company's intellectual property without obtaining the Company's prior consent.
- **Do not reveal the Company's confidential information or trade secrets (highly confidential proprietary information) to a third party unless the Company has granted permission to the third party to receive that confidential information.**

- If you receive what you believe to be another's trade secrets, do not use or share the information, but instead contact the Legal Department.

CONFIDENTIALITY

In the course of your work, you may have access to confidential information regarding the Company, its suppliers, clients or perhaps even coworkers. Each employee is responsible for safeguarding confidential information obtained during employment. You should not reveal or divulge any confidential information to outsiders, including other clients or third parties and members of one's own family. This applies even after you leave employment with the Company. Furthermore, no one is permitted to remove or make copies of any Company records, reports or documents without prior Management approval. In furtherance of this policy, each employee may be asked to sign a Confidentiality Agreement. However, even in the absence of such an agreement this confidentiality clause is a condition of your employment with the Company.

ENVIRONMENT AND SAFETY

Pernix is aware of its obligation to the community to prevent further degradation to the environment and works with employees, suppliers and customers to minimize or eliminate adverse effects on the environment. All employees are encouraged to actively work to identify, eliminate or minimize potential environmental problems.

Key Points to Remember:

- You can contribute to keeping the workplace safe. If you are aware of a dangerous or hazardous condition, immediately report the situation to your supervisor or your Human Resources Department.
- As a manager, when an employee has an environmental, health, or safety concern regarding a situation that might pose an imminent danger, you must address the problem immediately. For less obvious environment, health and safety concerns, you should: (1) listen carefully and ask questions; (2) investigate and visit the location if necessary; (3) use the available resources such as the Safety Manual and experts in the Legal Department; (4) provide constructive feedback to the employee; and (5) if the concern is founded, fix the problem as soon as reasonably possible.

CONFLICT OF INTEREST

As an employee, you or any member of your immediate family should not engage in any activity that might benefit you or your family member personally at the Company's expense, or that would be harmful to the Company or contrary to the Company's interests.

Every employee owes the Company a duty of loyalty, which includes protecting the Company's legitimate interests and advancing those interests when the opportunity arises; protecting the Company's assets and ensuring their proper and efficient use; and using company assets only for legitimate business purposes.

While it is not practical to list all situations that are prohibited because they might lead to or constitute a conflict of interest or violation of trust, the following key points to remember are good examples.

Key Points to Remember:

- You, or any immediate member of your family, may not accept commissions, a share of profits or other payments, loans (other than with established banking or financial institutions at prevailing market rates), services, preferential treatment, excessive entertainment or travel, or gifts of more than nominal value from any individual or organization doing or seeking to do business with the Company.
- Never solicit any gift, entertainment or anything of value, or accept any gift or entertainment that would be illegal or result in any violation of law, from any individual or organization doing or seeking to do business with the Company.
- Never accept any gift of cash or cash equivalent (such as gift certificates, loans, stock or stock options), or accept anything as a "quid pro quo," or as part of an agreement to do anything in return for the gift, from any individual or organization doing or seeking to do business with the Company.
- Never accept any gift or entertainment that violates your own department's more restrictive standards.
- Never participate in any activity that you know would cause the person giving the gift or entertainment to violate his or her own employer's standards.
- Never attend or participate in any entertainment that is unsavory, sexually oriented or otherwise violates the Company's commitment to mutual respect, as a guest of or host of any individual or organization doing or seeking to do business with the Company.
- You, or any immediate member of your family (spouse, domestic partner, parents, children and their spouses, domestic partner's children and their spouses), may not have a business interest

in any organization doing business with, or seeking to do business with, or competing or seeking to compete with, the Company without prior written disclosure to and approval by the Company.

- You, or any immediate member of your family may not, directly or indirectly buy, sell or lease any kind of property, facilities, equipment or services from or to the Company through another company, firm or individual.
- You may not use or release to a third party any proprietary or confidential information about the Company, including information concerning Company operations, practices, decisions, plans or competitive bids.
- You, or any immediate member of your family, may not receive improper personal benefits (including loans to, or guarantees of obligations) as a result of your position in the Company.
- No outside activities, including outside employment, may interfere with your job performance for the Company.
- A current or former employee may not solicit, directly or through a third party, current company employees to terminate their employment.

Discrimination and Sexual or Other Harassment

The Company strives to provide a workplace free of improper and unlawful discrimination or harassment of employees by supervisors, coworkers or third parties. Illegal discrimination, harassment or retaliation of any kind will not be tolerated. Any violation of this policy will subject the employee to disciplinary action, up to and including immediate termination.

This Policy Against Discrimination and Harassment is a statement of the Company's desire and intent to comply with state and federal laws against discrimination and harassment in employment, and is not intended as a contractual commitment to an applicant or employee.

Discrimination occurs when, in any aspect of employment, an employee is treated differently than similarly situated coworkers on the basis of the employee's race, color, religion, national origin, ancestry, age, sex, marital status, disability or other protected classification. This policy applies in all aspects of employment including, without limitation, recruitment, hiring, training, evaluation, promotion, demotion, discipline, compensation, benefits and termination.

Harassment includes any unwelcome or unsolicited verbal, physical or visual conduct that substantially interferes with an employee's job performance or that creates an intimidating, hostile or offensive working environment. This behavior is unacceptable in the workplace or in other work-related settings. In particular, sexual harassment includes unwelcome sexual advances, requests for sexual favors and other verbal, physical or visual conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of unreasonably

interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Examples of sexual harassment include unwanted physical contact, foul language, sexually oriented propositions, jokes or remarks, obscene gestures, or the display of sexually explicit pictures, cartoons or other materials which may be considered offensive to another employee and should therefore not occur. The Company prohibits all forms of sexual harassment, including male/female, female/male and same gender harassment. No manager, supervisor or other employee of the Company has the authority to require an employee to submit to sexual harassment as a condition of receiving any job benefit (such as a raise or a promotion) or avoiding any job detriment (such as a pay cut or a demotion). Sexual harassment between employees of any gender(s) is prohibited.

Further examples of prohibited harassment include racial or religious slurs, ethnic or disability related jokes, posting of offensive statements, posters, or cartoons, or other similar conduct.

Retaliation is any adverse action relating to an employee's status or conditions of employment, which action is taken against the employee as a result of the employee's report of discrimination or harassment. The Company forbids retaliation against employees for opposing harassment, for reporting harassment or for participating in an investigation of suspected harassment. Retaliation can take the form of verbal or physical misconduct, shunning or adverse employment actions such as negative evaluations, less favorable work assignments, discipline or discharge.

Complaints and Reporting. The Company wishes to act immediately on any incidents of discrimination, harassment or retaliation. If you feel you are being discriminated or retaliated against or harassed, or if you have observed discrimination, retaliation or harassment affecting another employee, you have the responsibility to notify the Human Resources Department or the President of the Company *immediately*. Under no circumstances is the employee expected to report the discrimination or harassment to the person engaging in such conduct. Employees have the duty to report known or suspected discrimination, retaliation or harassment and should not assume that someone else will report the incident or that Management already knows of the problem.

Investigation. When appropriate, complaints of discrimination, harassment or retaliation will be investigated thoroughly, promptly and, to the greatest extent possible, in a confidential manner. This is to protect the confidentiality of the employee who files a complaint, to encourage the reporting of incidents of harassment, and to protect the reputation of any employee wrongfully charged. Knowingly false or malicious complaints of discrimination, harassment or retaliation are prohibited. All employees have a duty to cooperate in the Company's investigations.

VIOLENCE IN THE WORKPLACE POLICY

The Company will not tolerate violence, threats of violence, physical or verbal intimidation or abusive conduct by any employee (1) in the workplace, (2) toward any Company employee or (3) toward any other person on the Company's premises. All threats of violence will be taken seriously, even those intended as jokes.

The Company prohibits all persons who enter Company property from carrying a handgun, firearm, knife or other weapon of any kind regardless of whether the person is licensed to carry the weapon. The only exception to this policy will be police officers, security guards or other persons to whom the Company has given written consent to carry a weapon on the property.

Any employee who has any knowledge or information regarding violence, a threat of violence, physical or verbal intimidation, or abusive conduct by any employee of the Company must report such information to Human Resources or any supervisor or manager immediately. The Company will protect the identity of the reporting employee to the greatest extent possible.

Any violation of this Policy will result in disciplinary action, up to and including immediate termination.

RULES OF CONDUCT

As a Pernix employee, you can expect a safe and productive workplace that ensures your ability to succeed and grow with your job. The rules listed below represent the guidelines and principles that all employees must work by at Pernix.

Attendance

1. Report for work on time.
2. Call in when absent and when you expect to be late as far in advance of your scheduled starting time as possible. Five (5) consecutive days absence without advising the Company will be grounds for dismissal.
3. Remain in the area necessary for the efficient performance of your work.
4. Remain at work unless you are authorized to leave early.
5. Clock in and clock out of work in the prescribed manner for you. You must not clock others in or out of work.
6. Unauthorized appearance on the premises of the Company while off-duty is restricted and your presence must not interfere with the orderly work of others who are on duty.

Performance of Work

7. Follow instructions received from Managers. Insubordination will not be tolerated.
8. Use only the machines or equipment to which you are assigned or specifically authorized to operate.
9. Be sure to observe security and smoking regulations in all areas in which you work or visit.

10. Wear suitable clothing for your work and take pride in your neatness and appearance.
11. Avoid damaging Company property and the property of others.
12. Report any damaged property or defective work immediately upon discovery.
13. Loafing, sleeping on the job or intentional restriction of output is prohibited.
14. Misrepresentation of facts or falsification of records is prohibited.

Safety

15. Work carefully. Observe posted or published regulations.
16. Use safety equipment.
17. Report immediately to your Manager any accidents or injury sustained on the job.

Personal Conduct

18. Be courteous and helpful to our vendors and customers.
19. Conduct yourself in a moral and decent manner.
20. Consider the welfare of the Company and your fellow employees. Perform no act that is detrimental to either.
21. The sale, use or possession of alcohol or drugs, or being under the influence of alcohol or controlled substances while on the job or Company property, or while operating Company-owned vehicles or equipment is strictly prohibited.
22. Distributing or posting literature on Company property, or posting or removing bulletin board notices requires prior authorization of the Company.
23. Soliciting, collecting, or accepting contributions on Company time requires Company authorization.
24. The use of Company time, material or facilities for purposes not directly related to Company business, or the removal or borrowing of Company property without permission is prohibited. Employees are responsible for the safekeeping of corporate resources with which they have been entrusted.
25. Gambling of any kind on Company premises is prohibited.
26. Horseplay, fighting or scuffling on Company premises at any time is prohibited.
27. Behavior that violates the Company's work environment, even if intended as a joke, is absolutely prohibited and will be grounds for severe corrective action, up to and including termination of employment. This includes, but is not limited to, threatening, intimidating, interfering with, or abusive, demeaning or violent behavior toward another employee, contractor, customer or vendor while either on or off duty. Behavior that is also **hate related** will result in immediate termination of employment, regardless of length of service and prior employment record.
28. Pernix requires employees to immediately report to their immediate supervisor about any prescribed medicine that impairs their job or poses a threat to the safety of others.
29. Pernix requires employees to report to their Manager any convictions under a criminal drug statute for violations occurring on or off Company premises while conducting Company business within five (5) working days after the conviction.
30. Dishonesty of any kind in relation to the Company, such as theft or pilferage of Company property, the property of coworkers or property of others entrusted to the Company, or misrepresentation in obtaining employee benefits or privileges, will be grounds for

dismissal and, where the facts warrant, prosecution to the fullest extent of the law. Employees charged with a criminal offense, on or off duty, may immediately be withheld from service. Any action constituting a criminal offense, whether committed on or off duty, will be grounds for dismissal.

31. An employee may not seek to influence the hiring, transfer, promotion or discipline of a relative in any way, including inquiries about such actions. Failure to abide by this rule will result in disciplinary action against the employee up to and including termination. If the infraction involves interference in the hiring of a relative, the employee's relative will not be considered for employment.

The possession of firearms, explosives or other weapons on Company property, or while attempting to access secured areas of Company property, or knowingly permitting another employee to do so is strictly prohibited. This includes both on and off duty periods.