



Ethics Pocket Guide

This pocket guide is designed to be a helpful, every-day supplemental resource for you regarding JCM's Code of Business Ethics and Conduct ("Code"). Because it is designed to be short and an easy reference guide, it only touches on some of the subjects covered in the Code, so you are expected to understand and fully comply with the Code.

JCM's Core Values

- ❖ **INTEGRITY.** Doing our utmost to keep our customer commitments while applying honest, moral, and fair principles in our daily actions. It is our duty to represent the truth and reflect JCM's Code.
- ❖ **RESPECT.** We relay respect by treating others openly, honestly and with dignity. We must hold in high regard our diversity, our individual skills, and our individual experiences that blend together to make a healthy and respectful environment.
- ❖ **TRUST.** Earning mutual trust by doing what is right and taking ownership of our actions. We do this by being honest and fair with not only our customers but our fellow associates.
- ❖ **QUALITY.** Our objective is continuous quality improvement in all that we do, so that we maintain our customer's confidence in our abilities to provide them with the highest quality of precision machined components.
- ❖ **ACCOUNTABILITY.** Our growth and success is determined by being able to hold ourselves accountable as we work towards keeping our internal and external customer commitments.

Reporting

You are obligated to bring any issue concerning a suspected violation of JCM's Code, Government Contracting Compliance Policy, its contracts, laws, or regulations to us, either through your supervisor, the ECO, the President/CEO, or the Ethics Helpline. JCM's goal is to create a culture that allows everyone to feel comfortable discussing issues and concerns freely with the proper individuals.

Ethics and Compliance Officer

JCM has appointed Vanessa Finley as the ECO to serve as the company's point of contact for ethics and compliance related questions and concerns. The ECO reports directly to the Board of Directors, leads the ethics and compliance program, and ensures all employees understand and follow the Code. Ms. Finley can be reached at vfinley@jcmcorp.com and (909) 923-3730 ext. 224.

**Ethics - Doing what's right,
even when no one is looking!**

Ethics Helpline

We understand that sometimes you may not feel comfortable reporting a concern to your supervisor, the Ethics & Compliance Officer ("ECO") or the President/CEO. We want to hear from you and address your concerns. JCM has retained an independent third party, Lighthouse Services, Inc. ("Lighthouse"), which enables employees to report ethics or compliance related questions or concerns anonymously.

- ❖ Telephone at (833) 290-0001 (English), (800) 216-1288 (Spanish);
- ❖ Website at www.lighthouse-services.com/jcmcorp;
- ❖ E-mail at reports@lighthouse-services.com; or
- ❖ Fax at (215) 689-3885

Questions To Help Guide Decision-Making

At some point, you might be faced with an ethical dilemma or challenge.

This can be a situation where the right answer isn't clear or you're asked to do something you're not comfortable with. There isn't an instruction manual for handling these situations, but here are some things to consider:

Am I the right person to make this decision or take this action? Each day, you have the ability to take actions potentially affecting all of JCM's employees and their families. Your choices have consequences. Before making a decision or taking action, you must ensure that you are indeed the right person to do so.

Are there any rules governing this decision? Especially in a highly regulated industry such as government contracting, rules can be complex. Make sure that you understand the rules or inquire with the people who do before deciding how to act. You are not expected to know all of the answers—you are only expected to raise a question when something does not seem right.

Am I acting honestly, transparently, and with business integrity? Even if the action you intend to take does not violate any laws, regulations, or contract requirements, are you acting honestly, transparently and with business integrity?

Is my decision consistent with JCM's Core Values? Use JCM's Core Values to guide your decision-making. If a potential solution is in conflict with our Core Values, you have your answer.

Even though I might mean well, how would this look to someone who doesn't know me, to my children, parents, or in the newspaper (i.e., are there any appearance issues associated with your decision)? Often, the wrong thing is done for the right reasons. Regardless of the pressures that you are facing, a bad decision cannot be undone. Take the time to examine the situation objectively; if you cannot, contact one of our resources who can help you do so.

Am I afraid of contacting someone about my concerns? When ethical issues arise, especially those involving the conduct of others, reaching out can be difficult. You might wonder what would happen if you were wrong or how your choice might affect the other person involved. Think about how you would feel if you ultimately learn that your concerns were justified and you did nothing.

JCM supports you and has many resources available to help you. The goal is for each and every one of us to make decisions we can take pride in.

Non-Retaliation

JCM requires employees to report any and all ethics or compliance related concerns regarding suspected violations of Company policy, contract terms, laws, or regulations. JCM prohibits retaliating against an employee who reports a concern in good faith. Anyone who violates the non-retaliation policy is subject to discipline, including up to termination. When you make reports, you do not need to be right and may not have all of the facts. This is okay and expected. However, you must act in good faith when raising an issue and shall not submit a report you know to be false or inaccurate. Making an intentionally misleading statement is subject to disciplinary action.

Message from the President and CEO

As we move into 2019, I am honored to be serving in the role as JCM's new President and CEO and look forward to leading JCM and making JCM the best company it can possibly be. I am fully committed to building a strong ethical, respectful and positive culture at JCM and a world class ethics and compliance program and am counting on each of you for your daily support and feedback along the way. I want JCM to be a place where you feel valued and know that you can talk to your supervisor, the ECO, or me about anything on your mind. Where you wish to report a concern anonymously, you also have our Ethics Helpline. With mutual trust and respect, JCM's future success is unlimited. Remember, being ethical requires us all to do what's right even when no one is looking. If you embrace our core values and this message, I am confident you will stay on the right side of ethics. If you ever have any questions, comments or want to report a concern, my door is open and I can be reached at (909) 923-3730 ext. 244 and Myrna@jcmcorp.com.



Myrna Lampar
President and CEO

JCM Engineering Corporation