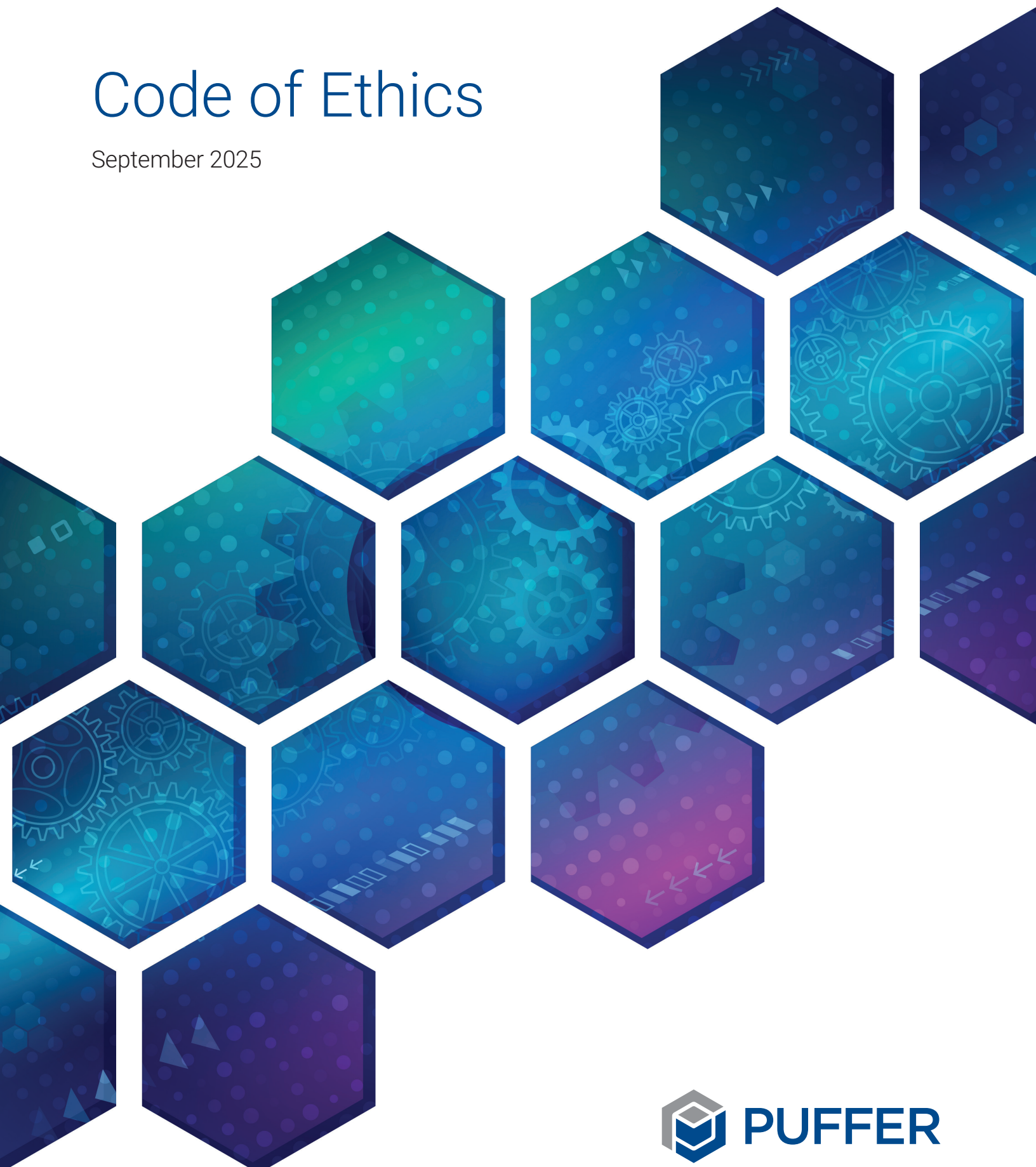


# Code of Ethics

September 2025





Dear Puffer Employees:

The Company's success depends on the trust and confidence we have earned from our customers, principal manufacturers, suppliers, and each other. We gain this trust and confidence by adhering to our commitments, by displaying honesty and integrity, and by reaching our Company goals solely through our honorable actions. We can talk about being ethical in our business dealings, but we are judged by how we act in each one of the thousands of business interactions we have every year. It takes only one breach of the Company's ethical standards to jeopardize the trust and confidence that we have developed over more than seven decades.

To assist you with understanding the high ethical standards of our Company and the expectations for employee business behavior, we have developed and adopted our Code of Ethics. This Code of Ethics reflects our Purpose Driven Mission and Core Values for which our Company stands and demands of our business behavior. Underlying the Code of Ethics is the expectation that all employees conduct themselves with integrity and to the highest standards.

Please make this Code of Ethics an integral part of your everyday business life at the Company. Conducting business in a manner that is beyond reproach is a responsibility and an obligation of all employees, and through these behaviors we will continue to build on the trust and confidence of our stakeholders. As employees of the Company, we all have a vested interest in preserving and protecting the sterling reputation the Company has earned.

Please take the time to review the Code of Ethics carefully. You should address any topics that are unclear with your immediate supervisor or the Human Resources Department.

Thank you for your continued support and commitment.

Sincerely,

Carlos Garza  
President and CEO





## Our Purpose and Mission

Team Puffer advances a **responsible, modern world** by solving our customer's challenges with our **world-class technology** and industry-specific **technical expertise**. This allows us to deliver **high-quality** solutions that **maximize** the performance, reliability, and safety of our customers' operations.

## Our Core Values

Team Puffer is building the Company for the **generations that follow** by committing to our values:





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# Our Code of Ethics

Our Code of Ethics, or 'Code,' is our stated commitment that every decision we make and every action we take, demonstrate our Core Values. These Core Values form the foundation of how we conduct our business, fulfill our Purpose, and achieve our Mission. Our customers, principal manufacturers, and each one of us count on it, and our continued success depends on it.

The Code of Ethics covers a number of the ethical and business issues you may encounter and impacts a broad range of Company activities. This single document cannot provide all of the answers to every circumstance you may face, but is intended as a guide and general policy statement. You may find additional guidance in separate Company policies and procedures and/or in consultation with your supervisor or Human Resources.

Our employees worldwide are expected to comply with the laws, rules, and regulations applicable to Puffer-Sweiven and its business operations. In some cases where local law sets a higher standard, the local law will apply for that subsidiary. Where local labor and employment or other applicable laws conflict with the rules of conduct in this Code, the local work rules, employment agreements, and laws will govern employee behavior and corrective actions. In such situations, this Code will serve in a supplementary capacity. If you need clarification as to what applies to you in such a situation, please consult your immediate supervisor or Human Resources.

## RESPONSIBILITIES OF THE COMPANY

Puffer-Sweiven is committed to providing a work environment in which high standards of ethical behavior are encouraged and required. The Company is dedicated to providing you with the necessary tools to understand the Code of Ethics, including a copy of this handbook, ethics training, and access to supporting policies and procedures.

The Company has safe and confidential resources so you can seek advice on business ethics expectations and to raise any concerns or report any violations of this Code, other Company Policies and Procedures, or applicable laws and regulations.

## RESPONSIBILITIES OF OUR LEADERS

With respect to the Code of Ethics, leaders at all levels within our organization have the responsibility to:

- Lead by example,
- Demonstrate integrity, and
- Encourage discussion of the ethical and legal implications of business decisions.

We look to our leaders to be our trusted resources and to help provide information and training on the Code of Ethics and applicable policies, procedures, and laws. One of the best ways leaders can help prevent and detect compliance risks is to be aware of what is happening around them. We encourage our leaders to meet regularly with their employees to develop trust and rapport, as well as maintain an open door environment to provide a comfortable space for asking questions and raising issues. Leaders must promptly and appropriately respond to (or seek guidance regarding) an employee's good-faith concern.

## YOUR RESPONSIBILITIES

Our employees worldwide not only have an important responsibility to comply with all applicable legal requirements, but also to commit to behavior, decisions and actions that live up to our Code of Ethics. You are expected to read, understand, and adhere to this Code as well as the Company's policies and procedures. Upon joining the Company, and during an annual certification process, you will affirm your understanding of the Code.

To ensure that you are acting responsibly and in the best interest of the Company, be sure to examine each situation and carefully consider the following questions:

- *Would my action comply with applicable laws and regulations?*
- *Am I acting responsibly and with integrity?*
- *Would my action be viewed positively by co-workers, the community, and the government?*
- *Would I be comfortable if my action were made public?*
- *Would my action comply with the spirit or intent of our Code of Ethics, Core Values, and Company's policies?*

The Company relies on you to make good judgments and to seek help when you have questions or concerns.

If you face a business conduct dilemma, it is important that you ask questions, seek guidance, and raise concerns.

### Report Violations

You have a duty to promptly report any issue or concern that you believe, in good faith, may be a violation of this Code or other Company policy. If you become aware of activities that are improper, prohibited by this Code, or possibly illegal, it is your responsibility to report those activities to the Company.

You have multiple avenues for voicing your concerns and reporting such activity:

**Report directly:** Start by talking to your supervisor, as they may be your closest link to an issue and can act as a resource to resolve any potential problems. You may also contact your Human Resources Department or any member of senior-level management.

**Report anonymously:** You are also encouraged to use our unique Alertline communications system designed to make it as convenient and as comfortable as possible to send questions, comments,

or concerns to the Company on a confidential basis. Refer to the section “Where to Get Help or Raise Issues” in this Code for further information.

This Code strictly prohibits retaliation against employees who in good faith raise a concern about any actual or suspected improper conduct. However, employees who violate this Code—or who knowingly permit others to do so—will be subject to disciplinary action up to and including termination of employment and other appropriate measures. Likewise, employees who make false and malicious complaints of harassment, discrimination or retaliation (as opposed to complaints that, even if erroneous are made in good faith) may be the subject of appropriate disciplinary action.

### **Cooperate with Investigations**

On occasion, the Company may undertake an audit or investigation to obtain information about a particular activity or incident. This undertaking may include monitoring your workplace-related activities in a manner that complies with applicable laws.

You are expected to cooperate and provide assistance during an audit or investigation so that information can be gathered quickly and accurately.

## **POST-EMPLOYMENT RESPONSIBILITIES**

At and after your employment with the Company ends, you may have certain responsibilities that are consistent with applicable laws, this Code, and Company policies and procedures. Among others, you will be obligated to:

- Return all Company assets in your possession.
- Maintain the confidentiality of Company information.
- Assist the Company with investigations and litigation.
- Protect and transfer to your manager any of the Company’s assets and intellectual property including any Company files (electronic or otherwise) and any Company issued hardware.

# Working Together to Maintain a Safe and Productive Workplace

At Puffer-Sweiven, acting with integrity includes respecting each employee's unique character and contributions. The Company is guided by the principles of non-discrimination, respect for human rights, and individual freedoms. The Company strives to create an atmosphere where you can perform at your highest potential. Treating each other with dignity and respect is the foundation of good business conduct and fosters a safe and productive workplace that sets our Company apart.

## HEALTH AND SAFETY

Puffer-Sweiven promotes a safe and healthy workplace for all employees. Protecting our employees is critical to the Company and plays a significant role in everything we do and every decision we make.

You are responsible for observing the laws, regulations, and policies related to on-the-job health and safety. You must take appropriate and timely action to report or correct any known unsafe working conditions.

If you see or experience an accident, injury, or unsafe practice or condition, promptly notify your manager or the Company's safety personnel so that the situation can be appropriately remedied.

To promote a safe and healthy work environment, the Company reserves the right to inspect your work areas and personal possessions as well as those of visitors. This inspection will be done in accordance with applicable laws, and you are expected to cooperate with any such requests.

We share the responsibility for the safety of each other, and we conduct our business in a manner that protects the health and well-being of our employees and those who work with us.

## FAIR TREATMENT AND DIVERSITY

The Company is dedicated to hiring and promoting employees fairly, based on talent and merit. This commitment includes providing equal opportunity to all employees and applicants in all steps of the employment process. We recognize that by working together, we gain clear value from an inclusive workforce, which leads to better results for employees, customers, principal manufacturers, and suppliers.

We are committed to building an inclusive workplace that is representative of the marketplace and the communities in which we operate and free from discrimination.

We are dedicated to fostering a work environment where employees are respected and valued for their differences.

## WORKPLACE VIOLENCE PREVENTION

Puffer-Sweiven is committed to providing a working environment that is free from threats, intimidation, and physical harm. We strive to create a culture of mutual respect in a professional working environment.

The Company will not tolerate workplace violence and will investigate and take action it considers appropriate against any threat to a safe workplace. Threats may be anything that the individual perceives as an expression of intent to cause emotional or physical harm. If you believe you or another employee may be the target of workplace violence or threats of violence, you must notify your manager or Human Resources immediately.

## PROFESSIONALISM AND MUTUAL RESPECT

Consistent with the applicable laws where we operate, the Company is committed to providing an environment that is free from harassment, intimidation, or coercion of employees by co-workers, managers, or any other individuals with whom you come into contact while conducting business (e.g., consultants, contractors, temporary workers, customers, and suppliers).

The Company will not tolerate workplace harassment of any kind. Harassing conduct can be sexual or non-sexual, verbal or non-verbal, physical or non-physical. Unlawful harassment harms our workforce by creating an intimidating, hostile, or offensive work environment. We encourage you to help others by speaking out when another individual's conduct makes someone uncomfortable. If you experience or observe any type of harassment, please advise your manager or the Human Resources Department.

We take pride in creating a culture of mutual respect in which all employees and those with whom we do business are treated with courtesy and professionalism.

## SUBSTANCE USE

You must report to work free from the influence of any substance that could prevent you from conducting work activities safely and effectively. The wellbeing of all employees, as well as the quality and productivity demanded by customers and the Company, require a substance free workforce.

As a Company, we enjoy getting together and celebrating with each other. However, even at Company-related social events, where responsible alcohol consumption is permitted, you should consume alcohol in moderation and use good judgment. While on-duty, you are always expected to be completely sober and free from the influence of any substance that may cause impairment on the job, including prescribed and legal substances. The unauthorized use, possession, or distribution of alcohol or drugs while at work, on Company property, or while on Company business is prohibited.

## PRIVACY

The Company respects your privacy rights and interests and provides safeguards for the protection of personal information that is collected, held, and used. Subject to applicable law, this includes protecting any biometric data, specifically fingerprints, which are used for the purpose of giving employees in certain positions secure access to the Company's timekeeping systems.

# Working Together to Protect the Company

## FINANCIAL BOOKS

As an employee-owned company, all of us rely on the value of our Company for our long-term wellbeing. Therefore, Puffer-Sweiven's financial statements and accounting books and records must accurately report all financial transactions.

You should never intentionally cause the financials to be incorrect in any way or conceal relevant information from Company managers or the Company's auditors.

## BUSINESS RECORDS AND COMMUNICATIONS

You make decisions every day that are based on information and records created by other employees in the Company. It is critical that everyone ensures the integrity and accuracy of any reports, records, or other information they create or maintain and never create a false or misleading report. Records include but are not limited to:

- Financial statements and related accounting entries and adjustments
- Expense reporting
- Time reporting
- Customer requests
- Production and quality records
- Documents filed with or submitted to government or regulatory agencies

All public communications and disclosures in reports and documents that the Company files with or submits to regulatory agencies must be made in a full, fair, accurate, timely, and understandable manner.

Business documents and communications may become public through litigation, government investigations, and the media. In every document or communication, you should always accurately record the facts and take care to avoid:

- False or derogatory remarks
- Characterizations of people, the Company, or other companies
- The use of exaggeration, guesswork, or legal conclusions

When you communicate on behalf of the Company:

- Provide accurate information when promoting our products and services to inquiries from customers, principal manufacturers or other employees.
- Do not make misleading, false or exaggerated claims about our products and services or those of our competitors.

- Remember that the Company always encourages free and open discussion.
- Listen and speak with the goal of understanding. When you disagree, do so respectfully, treating each person with dignity.
- Exercise good judgment when using email and the internet at work, including but not limited to social media.

## EMAIL AND INTERNET

The Company provides email and Internet systems for business use. All electronic systems are the property of the Company and you have no right to privacy in any material created, received or sent on the Company systems. The Company may monitor Internet and email usage and block objectionable content.

Only Company-issued hardware and software will be supported, and the Company may remove any software or hardware that is not appropriately licensed, supported or that disrupts network/system performance. If you are authorized to connect your personal device to the Company network, you must use standard virus protection software.

Email is not entirely secure and may be susceptible to interception. It also creates a permanent record that can be forwarded, printed and retained on the sending and receiving computer for a substantial period of time. Be careful to exercise the same care, caution, and etiquette in sending e-mail messages as you would use in normal written business communications. Additionally, you should never create or communicate offensive, hostile, unlawful or abusive material. You should also avoid conducting any Company-related business through communication channels that cannot be accessed and records retained for business purposes, such as through personal, third-party, or other devices not authorized by Company.

## RECORDS MANAGEMENT

In the ordinary course of business, we produce and receive large numbers of documents. The Company is committed to compliance with all applicable laws and regulations relating to the preservation of records.

You should identify, maintain, safeguard, and dispose of records in compliance with the current retention schedule to ensure compliance with applicable law and Company business needs. Under no circumstances may you, nor may you direct anyone to, selectively edit or discard records. You must also comply with all safeguards in place to ensure that data is securely maintained to avoid confidential or private data to be disclosed or subject to a data breach. Immediately report to your manager or Human Resources if you suspect that any data has been compromised or subject to a breach.

If you learn of a subpoena or a pending, imminent, or contemplated litigation or government investigation, do not dispose of any records and contact your manager immediately.

## AUTHORITY TO ACT ON BEHALF OF THE COMPANY

Our customers and suppliers trust that the person with whom they are dealing is authorized to act on behalf of the Company. You should always adhere to the limits of your authority to act on behalf of the Company and not take any action to exceed or circumvent those limits. Unless you are authorized to do so, never sign any document on behalf of the Company or in any other way represent or exercise authority on behalf of the Company.

## OUR COMPANY ASSETS

You are expected to take reasonable precautions to safeguard Company assets and ensure their proper and efficient use. These assets include but are not limited to:

- Financial assets, such as cash and securities
- Physical assets, such as buildings, furnishings, equipment, inventory, and supplies
- Intellectual property, such as information about products, services, customers, systems, and people

You should use and maintain these assets with the utmost care and respect to conduct the Company's business while guarding against waste and abuse. Unrecorded, 'off the books' or 'slush' funds, or secret assets of any kind must not be maintained.

Assets also include information that is created, obtained, or compiled by or on behalf of the Company and belongs to the Company, including, but not limited to:

- Customer, principal manufacturer and supplier lists
- Terms and conditions with our customers, principal manufacturers or suppliers
- Directories
- Files
- Reference materials and reports
- Computer software
- Data processing systems
- Computer programs
- Databases

## CONFLICTS OF INTEREST

We are committed to making business decisions in the best interest of the Company, regardless of our personal interests or those of our particular business unit. Integrity is demonstrated by avoiding any activity or personal interest that creates or appears to create a conflict of interest. A conflict of interest arises when your personal, social, financial, or political activities have the potential of making it difficult for you to

Avoiding conflicts of interest allows us to act with sound business judgment, not influenced by personal interest or gain.

perform your work for the Company objectively and effectively. If you think you may be facing a conflict, the appearance of a conflict, or if you are unsure, you are required to report it to your supervisor or Human Resources.

## CUSTOMER RELATIONSHIPS

By maintaining positive customer relationships, we enhance our overall business health and effectiveness. As a customer-centric Company, we collaborate with our customers to offer customized solutions, always providing honest, accurate, and up-to-date information. A customer is any person in a position to purchase or to influence a decision to purchase Company products or services.

## MEALS, GIFTS, AND ENTERTAINMENT

The giving and receiving of business gifts and entertainment is a common business practice used to help us create goodwill and strong working relationships. However, giving or accepting meals, gifts, entertainment, or other incentives is not appropriate if it creates a sense of obligation or puts our business judgement in question. We must avoid even the appearance of gifts or entertainment as influencing a business decision.

We select products and services on the basis of price, quality, and value, and we expect our customers and suppliers to purchase in the same manner. When we do business with customers and suppliers, we may only offer or accept meals, gifts, or entertainment if it is in compliance with Company policies or applicable law and meets the following guidelines:

- Is offered for legitimate business purposes
- Is not lavish, i.e., is of reasonable value
- Is infrequent
- Is unsolicited
- Is not given as a bribe, payoff or kickback
- Is in good taste
- Occurs at a business-appropriate venue
- Is not cash or cash equivalent, e.g., gift card, securities

Gifts, meals and entertainment may never be provided to a government official (foreign or domestic).

# Working Together in the Market Place

Our success depends on strong relationships with customers, principal manufacturers, suppliers, and other business partners. It is critical for the sustainability of the Company that you know with whom you are doing business. The Company intends to do business only with those customers, principal manufacturers, suppliers, and other business partners who comply with the law and who demonstrate high standards of responsible business behavior.

Puffer-Sweiven is a results-driven company, and we believe in competing for business diligently, openly, and honestly. In keeping with that belief, you should always represent the Company products, services, and prices truthfully and with integrity, never making false or misleading claims about our products and services or those of our competitors.

## PURCHASING PRACTICES

The Company bases all purchasing decisions on achieving optimal value for the Company and alignment to our business standards and goals. We treat people fairly and do not discriminate against suppliers; however, it is appropriate to differentiate among suppliers based upon appropriate business considerations. The Company expects suppliers to comply with applicable laws and to conduct business with integrity and honesty.

## COMPETITIVE INFORMATION

In the ordinary course of business, you may come in contact with information about other companies, including customers, principal manufacturers, suppliers, and competitors. Obtaining this type of information is an ordinary part of operating in the marketplace; however, you should always be certain that you acquire this information through proper, legal means.

If you are offered information about a competitor that you reasonably believe is confidential or is offered in a suspicious manner, you should ask how the information was obtained and whether the information is confidential. We will not hire an employee of a competitor to get confidential information from that employee, nor will we ask any former employee of a competitor to disclose confidential information about previous employers.

## CONFIDENTIAL INFORMATION

The Company trusts you with valuable information, and we all share a responsibility for keeping this information confidential. You must protect the confidential information entrusted to you by the Company, its principal manufacturers, suppliers, and customers, except when disclosure is legally mandated or properly authorized by a Company manager. Remember that any intellectual property conceived while

employed at the Company, that pertains or relates to the Company's business, belongs to the Company.

Confidential information includes all non-public information that might be of use to competitors or harmful to the Company or its customers if disclosed. This includes but is not limited to inventions, discoveries, trade secrets, customer lists, financial and employee data, and internal memos and reports.

Your obligation to protect confidential information continues even after leaving the Company.

We act responsibly with the sensitive information of our principal manufacturers, suppliers, customers, and others with whom we do business.

## FAIR DEALING

We do not seek competitive advantages through illegal or unethical business practices. Each and every employee of the Company should endeavor to deal fairly with Puffer-Sweiven's customers, suppliers, competitors, representatives, and other workers or employees, and not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair practice.

## ANTITRUST OR COMPETITION

We strive to outperform our competition, but we do not and would never condone or support doing so through unethical or illegal business practices. Competition, or "antitrust" laws, are designed to promote competition in the marketplace. These laws require fair competition and seek to protect consumers by prohibiting business practices that interfere with competition, like agreeing with competitors to set pricing, rigging bids, dividing sales territories, restricting supply, and sharing certain information.

In addition to reputational harm to both Puffer-Sweiven and its employees and principal manufacturers, violation of antitrust laws is a criminal offense that can bring about both imprisonment and fines for the Company and the employees involved in the violation.

Although antitrust laws require that Puffer-Sweiven act independently, they give latitude in how goods may be distributed from a manufacturer to the marketplace. For example, Puffer-Sweiven can work with its principal manufacturers to develop sales strategies and pricing. Also, the Company may enter into an exclusive representation agreement with a principal that may or may not be limited to a geographic territory. These antitrust and competition laws permit enforcement of any territory restrictions.

To help ensure that the Company is acting consistent with antitrust laws, you must:

- Take care that any agreements with competitors do not restrict competition or otherwise violate the antitrust rules.
- Limit communications with competitors to only those actually necessary for the legitimate business interests of the Company.
- Deal fairly with all customers, principal manufacturers and suppliers, including our competitors.

- Respect our competitors' freedom to conduct their businesses as they see fit.
- Never use coercion in the sale of products or services to customers.
- Never use any unfair or deceptive act or practice.
- Refrain from any other action or inaction that could restrict competition.

In some cases, we purchase products or services from our competitors, interact with them at industry events/conferences, and work together on projects for joint customers. Such contacts with competitors are normal and need not be avoided if handled appropriately. Specifically, these interactions require caution, and you must avoid discussing matters with our competitors such as:

- Pricing policies, including the price or other terms on which the Company or competitor sells goods or services.
- Costs incurred or profits made in the distribution, manufacturing or sale of products and services.
- Customer identities and any terms and conditions in place with customers.
- Proprietary or confidential information about the Company or the competitor, as well as their respective customers, suppliers and principal manufacturers.

You should never make any agreement – formal or informal, spoken or written – with a current or potential competitor that could unlawfully limit how either company competes in the marketplace. The Company expects you to follow the antitrust and competition laws. If you are unsure about a situation involving a competitor, or one involving prices for our products, ask questions and seek guidance before going any further.

# Working Together in a Global Business

Puffer-Sweiven operates in a multinational environment wherein laws and customs regarding business practices vary from country to country.

This Code of Ethics transcends country borders: it defines who we are and how we will work—no matter where we are. We comply with the national and local laws of the countries where we operate and respect local customs and traditions, except to the extent prohibited by U.S. law. This includes but is not limited to immigration laws; customs, tax, or exchange control laws or regulations; and anti-corruption laws.

## EXPORT/IMPORT COMPLIANCE

We comply with all export and import laws and regulations that govern the transfer between countries of certain technical data, goods, and technology. As the controls that govern these transactions are complex, we are careful to avoid even inadvertent violations.

We maintain accurate documentation pertaining to all export transactions, including information regarding value, destination, end use, and classification.

## ANTI-CORRUPTION AND FCPA COMPLIANCE

Puffer-Sweiven is committed to avoiding corruption in any form and to complying with the U.S. Foreign Corrupt Practices Act (FCPA) and similar laws and international standards targeting corrupt business activities. We do not offer or accept bribes or any other kind of payment that we or the law deems improper. If we are prohibited from an action, we do not subvert the law or our policies by acting through a third party. We do not give or offer bribes, kickbacks, or anything else of value to government officials, civil servants, their relatives, or anyone having the ability to influence them.

Simply put, giving gifts or other things of value for the purpose of influencing business decisions is bribery and is against the law and our policies. Bribery can result in civil and criminal actions against both the individuals involved and their employers.

## ANTI-BOYCOTT LAWS

You may receive a request to cooperate with an unsanctioned boycott of another country that is 'friendly' to the United States. Such requests may appear in bid invitations, purchase contracts, letters of credit, shipping documents, or in conversation. Puffer-Sweiven cannot participate in such boycotts and must report all such requests to the U.S. Government. Anyone with knowledge of such a request must immediately notify the Human Resources Department.

## SECURITIES LAWS AND INSIDER TRADING

Puffer-Sweiven is not a publicly-traded company, but certain securities laws, including prohibitions on insider trading, apply to our employees in the U.S. and our foreign jurisdictions. We engage with many companies and individuals and may become aware of important information about a public company before it is made available to the public. This information is called 'material information' because it could influence a decision to purchase or sell a company's stock. Material information could include financial, sales, or inventory figures; potential acquisitions; significant capital investments; significant management changes; or investigations and litigation.

Trading on material information before it is public is called insider trading, which is both unethical and illegal. Anyone who is in possession of any material non-public information about a publicly-traded company may not:

- Purchase or sell any stock or securities of such company.
- Advise others to purchase or sell such stock or securities.
- Share this material information with others.

## POLITICAL ACTIVITIES

As members of both our local communities and the countries in which we live and work, we are all encouraged to become involved in matters that are important to us. However, we need to be sure our personal political opinions and activities are not viewed as those of Puffer-Sweiven. We also must respect the opinions of others by not promoting our personal political views at work. As a Company, we do not use any Puffer-Sweiven funds or assets to assist any candidate or nominee to gain political office, or assist any political parties or causes, unless permitted by law and expressly authorized by the Company's President.

## IMMIGRATION COMPLIANCE

To support the needs of our operations, both foreign and domestic, you may need to travel or assume temporary assignments in a Company facility outside of your current country of residence. We are committed to making sure the employment, travel, transfer, and residence of employees conform to applicable immigration and employment laws. Employees who travel internationally on business are responsible for obtaining appropriate visa and work authorizations before attempting to enter the country.

## RESPECTING HUMAN RIGHTS

We are committed to upholding basic human rights in all of our operations and throughout our supply chain. As part of this commitment, we provide reasonable working hours and fair wages to those who perform work on our behalf. We do not tolerate the exploitation of children, physical punishment or abuse, or involuntary servitude in our own Company, and will never knowingly engage in business with customers, suppliers, principal manufacturers, or any other entity who does not uphold these same values. All employees and those with whom we do business should immediately report any suspected human rights abuses, including human trafficking, to local law enforcement or to any of the resources outlined within this Code.

# Working Together to Serve the Greater Good

## PROTECTING THE ENVIRONMENT

We recognize that our business impacts the environment. To mitigate this impact, we comply with the laws designed to protect the vital natural resources of clean air, water, and land. We also aim to follow and promote good sustainability practices with the goal of reducing our environmental impact. We are committed to finding ways in which we can reduce our carbon footprint through source reduction and recycling.

## SUPPORTING OUR COMMUNITIES

Puffer-Sweiven is committed to supporting the communities where the Company has enjoyed its business success. We participate in a number of activities aimed at providing awareness and support for local charities. Your help and participation in these charitable activities is always welcomed.

As Puffer-Sweiven employees, we consider community giving our responsibility and enjoy volunteering with our fellow coworkers and their families to make a positive impact in our local communities.

# Where to Get Help or Raise Issues

In applying the Code of Ethics to your work life, if you suspect that any conduct lacks integrity or is in violation of our Code of Ethics, the Company’s policies, or applicable laws, you should always ask questions, seek guidance, and raise concerns.

We expect you to report known or suspected violations of this Code of Ethics. Examples of items to report include, but are not limited to:

- Any knowledge of any untruthful or inaccurate statements or records
- Transactions that do not seem to serve a legitimate commercial purpose
- Financial irregularities
- Fraud
- Misappropriation of Company property
- Illegal kickbacks
- Improper conduct

If an issue arises, we encourage you to speak with your manager first, as we believe that most of your issues and concerns can be handled by your department chain of command. In addition, you may contact your Human Resources Department or a member of senior level management. It is of utmost importance that you bring your issues to the Company through any one of the available resources.

If you are uncomfortable with the Company’s internal resources, you may contact the Ethics Compliance Alertline, which can be used to report ethics concerns or violations to a third-party independent company. All reports to the Alertline are anonymous if you desire, and your call will be sent to the Company for investigation and response or resolution.

## CONTACTING THE ETHICS COMPLIANCE ALERTLINE

You may report concerns or get more information **24-hours a day, 7 days a week** through the following methods:

- **Online:** Submit a report at <https://puffer.alertline.com>
- **Phone:**
  - **Within the United States:** Call 1-888-228-8946
  - **Outside the U.S.:** Please refer to the country-specific phone numbers listed in the table to the right.

Country	Phone Number
Chile	800-719-915
Colombia	01-800-518-9180
Ecuador	1-800-001-695
Guyana	<a href="https://puffer.alertline.com">https://puffer.alertline.com</a> (no calling available)
Peru	<a href="https://puffer.alertline.com">https://puffer.alertline.com</a> (no calling available)
Trinidad & Tobago	868-217-6070
Venezuela	212-335-3038

## INVESTIGATION AND RESOLUTION

When you ask a question, seek guidance, or raise a concern, appropriate Company leaders will promptly respond to the matter. If you have provided the Company a means to do so, you will receive an answer to your inquiry, although you may not receive detailed information about the investigation or resolution. If a concern regarding a violation is substantiated, the situation will be resolved through appropriate corrective actions. Corrective actions may include, among other things, clarification of a Company policy, additional training, facility or process change, or disciplinary action.

The Company handles inquiries and investigations confidentially and discloses the substance of your inquiry and/or your identity (if you choose to provide your name) on a strict, need-to-know basis, to the extent deemed necessary to conduct a thorough investigation and respond appropriately to the issue raised.

The Company will not discharge, demote, suspend, threaten, harass, or, in any manner retaliate against an employee who truthfully and in good faith raises a concern about any actual or suspected violation.

The Company prohibits retaliation against employees who oppose, complain about or participate in proceedings regarding potential violations of this Code or applicable law. If you believe you have been retaliated against for providing such information, you should immediately contact your manager or Human Resources Department.

## LEGAL STATEMENTS

"Company" or "Puffer-Sweiven" includes our world-wide organization: our U.S. employers, Puffer-Sweiven LP and Puffer Latin America, as well as our international employers: PUFFER SpA, PUFFER CIA. LTDA., Puffer Colombia, Puffer Peru, Puffer Venezuela, Process Management Limited, Puffer (Guyana) Inc., and all affiliates of these domestic and international employers.

This Code applies to all Company officers, managers, supervisors, and employees (collectively, "employees"). The President and the Board of Management of the Company fully authorize and support the Code of Ethics described in this booklet. Overall responsibility for the program rests with the Company's President, with oversight from the Board of Management.

This booklet does not create a contract of employment between the Company or any other subsidiary and any employee, nor does it alter any at-will employment relationship or any employment contract and/or agreement between the Company and any employee. In addition, this booklet does not create an implied or express promise for specific treatment in a specific situation. Rather, the Code provides and outlines the general responsibilities of the Company and its employees. A specific situation may require specific treatment that will require consultation with relevant management or Human Resources to obtain clarity on implementing and abiding by the general responsibilities referenced in this Code. Any requirements imposed on employees as to their employer are between the Company entity that employees the individual at issue and nothing contained in this Code creates a joint employment or single enterprise obligation between or among the other distinct legal entities within the Company's world-wide organization. You remain solely an employee of the entity that directly pays your wages and the issuance of this Code does not change your employment relationship.

The Code of Ethics and other corporate policies and related procedures may be amended from time to time. Any modifications, revocations, or additions must be in writing and authorized by the President of the Company. It is each employee's responsibility to comply with the Code of Ethics and all other policies and related procedures and to periodically review these documents to ensure compliance.

