

# Employee Code of Conduct

The name and reputation of Chicago Rivet & Machine Co. (the "Company") are a result of the dedication and hard work of all employees. Together, we are responsible for preserving and enhancing this reputation, a task that is fundamental to our continued well-being. Our goal is not just to comply with the laws and regulations that apply to our business; we also strive to abide by the highest standards of business conduct.

All employees, officers and directors are expected to comply with the policies set forth in this Code of Conduct. The Code cannot and is not intended to cover every applicable law or provide answers to all questions that might arise; for that we must ultimately rely on each person's good sense of what is right, including a sense of when it is proper to seek guidance from others on the appropriate course of conduct.

We at the Company are committed to providing the best and most competitive products to our customers. Adherence to the policies set forth in the Code will help us achieve that goal.

In short, our code of conduct is fairly simple and can be summarized by the following key points:

- Obey the law. At work, or whenever on company business, all employees are expected to comply with applicable state, local and federal laws, rules and regulations.
- Accurate reporting. As a public company, we are obligated to make full, fair, accurate and timely disclosure of a variety of information to our shareholders and various regulatory agencies. Information that you prepare or submit in the course of day to day operations needs to be complete and accurate at all times.
- Be honest and ethical. In all work and professional relationships, we expect you to treat others and the company with fairness and honesty. Conflicts of interest, or the appearance of a conflict of interest should be avoided at all times.
- Treat each other fairly and respectfully. We should at all times treat others as we would expect to be treated.
- Treat our customers fairly. Customers are why our jobs exist. They deserve nothing but the best quality and service that we can provide and they demand the best price. Please remember that our collective futures depend upon keeping the customer satisfied.
- Take responsibility. Each of us is part of a larger organization and our actions, or lack of action, can have a profound impact on the company as a whole. We ask that each of you adhere to our common goals and ask that you report violations of any rules or laws or this code of conduct to your supervisor, your local plant manager or anonymously, through our compliance hotline. The toll-free number is 855-650-0005, and it is available 24 hours a day or online at [www.lighthouse-services.com/chicagorivet](http://www.lighthouse-services.com/chicagorivet). No one will ever be subject to retaliation as a result of a good faith effort to report a suspected violation.
- Use common sense and good judgment - avoid actions and circumstances that may appear to compromise good business judgment or create a conflict between personal and company interests. If you are unsure about an action or an issue, please ask your supervisor for advice.