



CODE OF CONDUCT

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MESSAGE FROM WURMS DIVERSIFIED SOLUTIONS PRESIDENT

Doing things right is one of our most important values at Wurms Diversified Solutions ("WDS"). We work hard every day to provide products that enhance the lives of people in our community, our country, and all over the world.

We are clear about what we mean when we talk about doing things right. Not only does it mean that we provide products that are well made, fairly priced and of exceptional quality, but it also means that every step we take in making those products is taken with ethics and integrity in mind. We source material only from suppliers who have impeccable human rights records, ensure our supply chain is of high integrity and monitor our entire operation for compliance with our code of conduct.

Doing things right is not an option at WDS. Working here means making a commitment to uphold our company values and following the code of conduct outlined in this document. You will see the values Wurms Diversified Solutions' leadership expects all members of our organization to uphold. Every WDS leader, employee and representative is expected to adhere to this Code of Conduct. If you suspect any violations of the Code of Conduct or any other company policy, you are encouraged to report such activity to your department lead, supervisor, operations manager or Human Resources.

Jerry Wurm

Gerald "Jerry" Wurm

Co-Owner, President

Introduction

This Code of Conduct describes the standards required of each director and employee of Wurms Diversified Solutions (“WDS”). It sets forth the basic guiding principles and values of WDS and all members of the WDS organization, which are intended to assist directors and employees in conducting WDS affairs in accordance with law and the highest standards of business ethics. However, the Code of Conduct is not intended to provide a comprehensive description of all of WDS policies and practices.

A copy of the Code of Conduct is available on the WDS website at www.wurmsproducts.com. Other WDS policies and procedures are available in the employee handbook or can be provided by your department lead, supervisor or operations manager.

All members of the WDS organization must familiarize themselves with the principles and guidelines contained in the Code of Conduct and are expected to conduct their activities on behalf of WDS in accordance with this code.

Our Values

Integrity

- Adhering to a set of moral and ethical principles throughout all stages of the manufacturing process.

Customer Focus

- Involves prioritizing the needs, expectations, and satisfaction of customers throughout all aspects of the manufacturing process.

Teamwork

- The collaborative effort and coordination among individuals and groups within a manufacturing environment to achieve common goals and objectives.

Quality

- The degree to which our products meet specified requirements, conformance and expectations of customers standards.

Innovation

- The process of introducing new ideas, methods, technologies, or products that lead to improvements in efficiency, effectiveness, quality, and competitiveness within our manufacturing sector.

Global Compliance Policy

As a global company, WDS and its employees must operate in strict compliance with all laws and regulations applicable to WDS activities around the world. In addition, WDS and its employees must adhere to the moral and ethical standards of the individual countries in which WDS does business.

Unless previously approved by WDS VP Administration, where the Code of Conduct is more restrictive than local law or practice, WDS employees are required to follow the Code of Conduct. Where applicable laws are more restrictive than the Code of Conduct, WDS employees are required to follow applicable laws. Further, where any provision of the Code of Conduct requires or permits conduct that would be in violation of any applicable law for that area, employees must always comply with all applicable laws.

1. Compliance with Laws, Rules and Regulations

Obedying the laws, both in letter and spirit, is the foundation of which WDS ethical standards are built. All employees must comply with applicable laws, rules and regulations. Employees must promptly report any violation or suspected violation of law by WDS or any WDS employee to his or her superior or seek guidance as described in “Further Information and Advice” below.

2. People & Safety

Respect for the individual

WDS is committed to developing and maintaining a diverse workforce and adheres to the principle of equal employment opportunities for all applicants and employees. Unlawful discrimination in the hiring, promotion, compensation or retention of employees is strictly prohibited. Abusive, harassing, or offensive conduct is not permitted, whether verbal or physical. Examples include unwelcome sexual advances and derogatory ethnic or racial comments.

Retaliation against any employee for reporting discrimination or harassment will not be tolerated.

Health and safety

WDS is committed to ensuring its work environments meet the highest standards in protecting the health and safety of WDS employees, customers, suppliers and guests. Each employee has responsibility for maintaining a healthy workplace for all employees by following health and safety rules and practices and by reporting accidents, injuries, and unsafe equipment, practices or conditions. Members of the WDS organization must comply with applicable health and safety regulations and WDS policies, procedures and safety initiatives and must immediately report any unsafe working conditions to their department lead, supervisor or operations manager as described in “Further Information and Advice” below.

To protect the health and safety of its employees, WDS prohibits the use, sale, possession, or being under the influence of alcohol, illegal drugs, or controlled substances (except when permitted by company policy) by employees while performing work duties, while using WDS vehicles, or when using personal vehicles in the course of conducting business on behalf of WDS.

Environmental stewardship

WDS takes pride in its industry leading environmental stewardship and sustainability record, policies and initiatives. WDS is proud to provide an environmentally friendly and safe work environment. For these initiatives to be effective, employees must follow all laws, regulations, policies, and procedures that apply to their respective facilities, including record keeping and reporting requirements. Employees must immediately report any suspected environmental concerns, including spills and malfunctions of environmental control equipment, to his or her department lead or as described in “Further Information and Advice” below. WDS will take appropriate remedial action and ensure that timely notification is made to government agencies as required by law.

3. Maintaining Integrity

Integrity and anti-corruption

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain an unfair advantage with customers. Employees must be cautious about giving or receiving gifts or entertainment from vendors, customers and other third parties. While the exchange of some business courtesies, such as payment for a lunch or dinner in connection with a business meeting, would not normally be an inappropriate gift within the context of the code of conduct, other types of exchanges may go beyond business courtesy and frequency, kind or value could create an inappropriate influence on a business decision. Exchanges of gifts or entertainment and business relationships that may create inappropriate influences on business decisions are prohibited. The appropriateness of an exchange will depend on a number of factors, including an employee's role within WDS or job location. When a question about the appropriateness of an exchange arises, you must review the situation with the VP Operations or VP Administration of your functional area.

No gift or entertainment shall ever be offered, given, provided or accepted by an employee or family member of an employee unless it is 1) not a cash gift, 2) is consistent with customary business practices, 3) is reasonable and value, 4) cannot be construed as a bribe or payoff, and 5) does not violate any laws, regulations or ethical policies of the other parties organization. If you are not certain that a gift or proposed gift is appropriate, you must contact your VP to seek guidance as set forth in “Further Information and Advice” below.

Relationships with government representatives are governed by additional laws and regulations. Unless reviewed and approved in advance by company's VP of Operations or VP Administration, WDS employees shall not provide directly or indirectly any payment, gift or entertainment to any government official.



Because of the far-reaching impact the anti-bribery laws of the countries in which WDS operates, all employees must comply with WDS anti-corruption policies and procedures applicable to the employee's role and location.

Avoiding conflicts of interest

WDS employees must avoid conflicts of interest that may interfere or appear to interfere with WDS business interests or with an employee's obligations to WDS. So actuations that may personally benefit the employee, employee's friends or family or that may potentially interfere with WDS business interests might be construed as conflicts of interest. It would not be possible to reference every scenario giving rise to a potential conflict, however some examples of situations that could create a conflict of interest include:

- competing with WDS in another business venture
- owning or investing in a competitor, supplier, customer, dealer or representative of WDS (other than as a passive investor in a publicly traded company)
- using WDS confidential information or other WDS assets for personal gain

Any conflict of interest that arises, is perceived, or that an employee believes might develop, must be promptly and fully disclosed to the employee's department lead or seek advice as described in "Further Information and Advice" below. It will then be determined whether an actual conflict exists.

4. Ethical Business Conduct; National & International Trade

Fair dealing

Employees must act honestly and with integrity in all business relationships and deal fairly and in good faith with WDS customers, suppliers, competitors, government officials, and all others. WDS and its employees will exercise good business judgment in executing business transactions and never, directly or indirectly, accept from or offer to any person or organization any bribes, favors, or "kickbacks" as a condition to past, present or future business relationships. It is the responsibility of every employee to ensure that all payments are necessary, lawful and properly documented. WDS representatives may not take unfair advantage of a business relationship through illegal conduct, deceit or any other unfair practice.

All WDS employees are required to comply with all applicable laws protecting fair competition. WDS employees shall not enter into any agreement, written or implied, with a competitor about pricing, cost, terms, markets, production, customers or any other matter that could impact competition. Employees shall not exchange information about prices or production with a competitor. Any agreement with a competitor must be approved by WDS VP Administration.

Importing and exporting

Import and export controls and sanction laws give countries legal control over the sale, purchase, shipment, electronic transfer or disclosure of information, software, goods and services going across national borders. Before transferring these items into another country, performing services in another country, or receiving these items from another country, you must understand and observe the import/export restrictions on those goods or services. In addition, controls and sanctions or embargoes can be imposed against countries, entities, individuals and goods, which may restrict the way WDS conducts business. Contact WDS VP Administration for additional guidance on these rules.

5. Safeguarding Company Information & Property

Protection of confidential and proprietary Information

WDS employees have a duty to safeguard WDS property, including proprietary and confidential information. Proprietary and confidential information that must be protected includes without limitation technical information, information about products, operations, personnel, marketing plans, production plans, customer and supplier data, pricing information, trade secrets and other information WDS uses to conduct its business. This information must not be disclosed to third parties without prior authorization. It must not be used for personal gain. The obligation to protect this information continues after employment with WDS.

Communication equipment

WDS telephone, Cellular devices, computers and other communication equipment should be used primarily to conduct company business. WDS allows reasonable and limited personal use of WDS electronic resources by employees. Employee personal use is a privilege and must not unduly burden WDS systems.

Record creation and retention

WDS books, records, and reports must be complete and accurate. Noncompliance with this policy must be immediately reported. WDS records must be retained, discarded, or destroyed only in accordance with applicable laws, regulations and WDS policies and procedures.

Protecting assets

WDS employees have a collective responsibility to protect WDS assets from misuse, fraud and theft and ensure records are accurate, timely and complete. Theft, carelessness, and waste have a direct impact on WDS success. All WDS assets must be used for legitimate WDS business.

Corporate opportunities



WDS employees are prohibited from taking for themselves opportunities that are discovered through the use of WDS property, information or position without the consent of VP Administration. No employee may use WDS property, information or position for personal gain and no existing employee may compete with WDS, directly or indirectly. Employees must further WDS interest when the opportunity to do so arises.

6. Acknowledgement & Violations of the Code of Conduct; Non-Retaliation

Acknowledgement

WDS employees, officers and directors will be asked periodically to acknowledge their commitment to the code of conduct. Newly hired employees will be required to acknowledge their commitment to the code of conduct prior to or immediately following commencement of employment. Many independent third party, such as consultants, agents or independent contractors, retained to do work or represent WDS interest may be asked to acknowledge the principles and policies in the code of conduct that are applicable to their work.

Violations of the code

Violations of the code of conduct may result in disciplinary action, up to and including termination of employment and may, depending on the nature of the violation involved, result in civil or criminal action against the employee. Those subject to disciplinary measures may also include others involved in the wrongdoing besides the violator, such as 1) Employees who failed to use reasonable care to detect a violation, 2) employees who withhold or misrepresent material information that has been requested with regard to a violation, and 3) employees in any supervisory capacity who approve or condone a violation, or attempt to retaliate in any way against another person reporting a violation or providing related information or assistance.

Non-Retaliation

WDS is committed to providing workplace conditions that allow employees to report concerns and raise issues without fear of retaliation. Retaliation against a person who reports in good faith and violation of the code of conduct or applicable law, raises compliance questions or issues, or cooperates in an investigation of a potential violation, will not be tolerated. Any retaliation is a serious offense and will result in disciplinary action, which may include termination of employment.

7. Further Information and Advice

WDS has designated certain employees to assist in resolving questions concerning the interpretation and application of the code of conduct. The following are the employees available to assist, lists in the order that they would typically be contacted.



- A) Department Supervisor or Operations Manager. An employee should first contact his or her supervisor or operations manager.
- B) Human Resources. Representatives in human resources are trained to help with these issues.
- C) VP Administration. If an employee would feel more comfortable inquiring about or reporting a concern to VP Administration, he or she may do so by contacting:

VP Administration

Wurms Diversified Solutions

725 W. MANSFIELD STREET

NEW WASHINGTON, OH 44854

If contacting your supervisor, operations manager or human resources is not appropriate for any reason, you may report through our electronics suggestion box, where available, as described below.

Connect with WDS

Employees may connect with WDS confidentially and anonymously relay any concerns relating to the code of conduct. All communications to the electronic suggestion box are received by the Board of Directors. Concerns can be shared anonymously although the employee may leave contact information if he or she would like to be available for any questions or follow up. The WDS electronic suggestion box is available 24 hours a day, seven days a week through the Internet at

<https://forms.gle/bySTrUbwkeEDepbBA>.