Company Integrity Policy

Confidentiality of Company Information

It is the responsibility of all Tube Processing Corporation employees to safeguard sensitive Company information. The nature of our business and the economic well-being of the Company is dependent upon protecting and maintaining proprietary information. Continued employment with the Company is contingent upon compliance with this policy. Sensitive Company Information is defined as trade secrets, intellectual property or confidential information relating to products, processes, know-how, customers, designs, drawings, formulas, test data, marketing data, accounting, pricing or salary information, business plans and strategies, negotiations and contracts, inventions and discoveries. Unless otherwise identified by management, all employees shall assume that such information is confidential.

Business Ethics and Conduct

Tube Processing's successful business operation and reputation is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity. Thus, employees owe a duty to the Company, its customers, and the general public to act in a way that will merit trust and confidence.

To protect and enhance our reputation, the Company requires its employees to fully comply with all applicable laws and regulations and to refrain from any appearance of having engaged in any illegal, dishonest or unethical conduct. The Company further requires that all employees be guided by the highest standard of conduct in their business contacts and relationships. The following examples are considered to involve a conflict of interest that violates this policy:

- Serving as an employee, officer, director, or consultant for any customer, client, competitor or supplier of materials or services.

- Holding any financial interest by an employee or an immediate family member (including father, mother, brother, sister, son, daughter, husband or wife) in the business of any customer, client, competitor or supplier of materials or services. This does not include a financial interest in widely held corporations that are quoted and sold on the open market, unless the amount held is in excess of 10 percent of the outstanding stock of that corporation or the stock held has a value representing more than 10 percent of the individual's personal net worth.

- Borrowing money from or lending money to any customer, client, competitor or supplier of materials or services other than recognized financial institutions (*e.g.*, banks, credit unions, etc).

- Accepting gifts, entertainment, or anything of value from any customer, client, competitor or supplier of materials or services other than minor holiday gifts of a nominal nature.

- Engaging in or attempting to engage in a romantic relationship with any customers, clients, competitors, or suppliers of materials or resources.

It is important to avoid not only any situation that is an obvious conflict of interest such as those listed above, but also any situation that might give the appearance of being a conflict of interest.

In general, common sense and good judgment will guide you with respect to lines of acceptable conduct. However, if a situation arises in which it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate supervisor and, if necessary, with the Company's Human Resources Director for advice and consultation.

Compliance with the expected level of business ethics and conduct is the responsibility of every Tube Processing employee. Disregarding or failing to comply with this standard could lead to disciplinary action, up to and including possible termination of employment.