



## UNIVERSAL MFG. CODE OF CONDUCT

This Code of Conduct outlines expected behaviors for all directors, officers and employees of Universal Mfg. Co., and its subsidiary companies. Such directors, officers and employees are referred to herein collectively as the "Covered Parties". Universal Mfg. Co., and its subsidiaries are referred to herein collectively as the "Company". The Company will conduct its business fairly, impartially, in an ethical and proper manner, and in full compliance with all applicable laws and regulations. Integrity must be maintained with all relationships with customers, suppliers, communities we live and deal in and with fellow employees.

Covered parties will ensure that:

- They do not conduct themselves in any activity that might create a conflict of interest for the Company or for themselves individually.
- They do not take advantage of their position to seek personal gain through the inappropriate use of the Company, nonpublic information or abuse their position. This includes not engaging in insider trading and accepting gifts to influence their decision making.
- No use or disclosure of proprietary information shall be made unless specifically authorized by the Company.
- Fair and impartial dealings are the foundation for all of the Company's transactions and interactions.
- They will protect the Company and its assets and use them only for appropriate Company approved activities.
- Without exception, employees will comply with all applicable laws, rules and regulations of the government entities to which the Company is subject.
- They will promptly report any illegal or unethical conduct to management or through appropriate channels for such reporting.

Covered parties are responsible to ask questions, seek guidance, and report suspected violations of this Code of Conduct. Retaliation against employees who come forward to raise genuine concerns will not be tolerated.