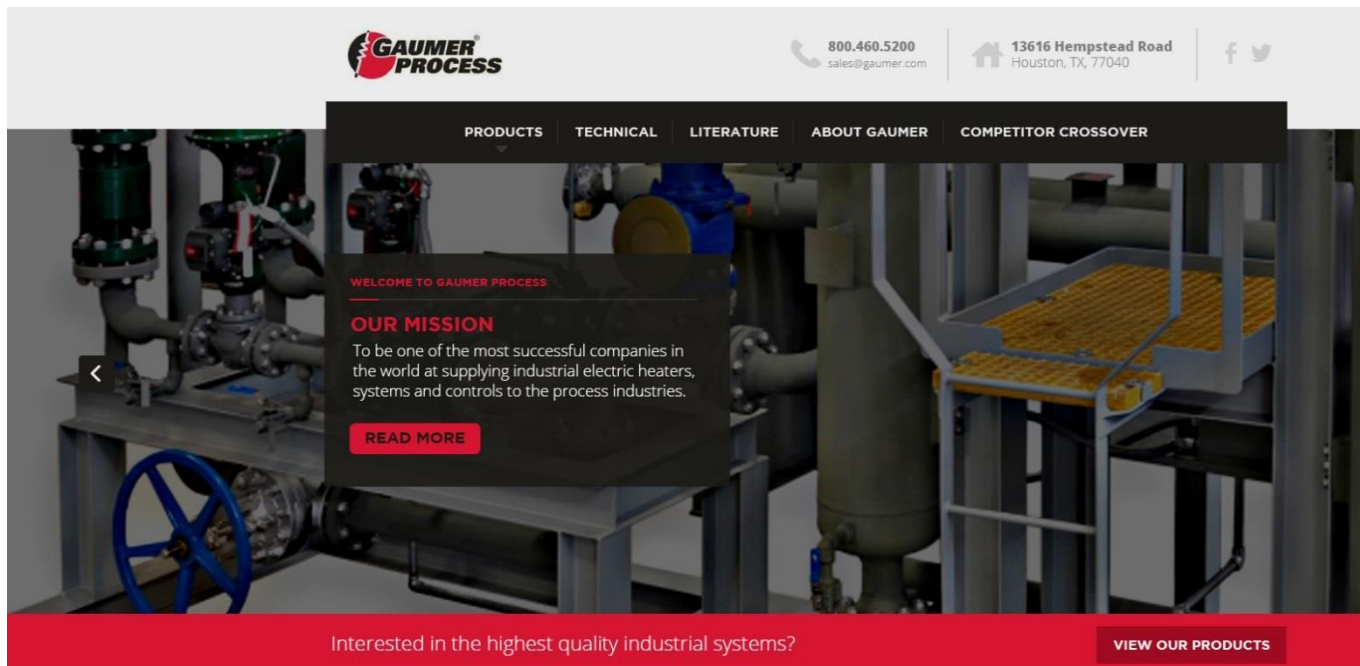




Integrity Guide

for Suppliers, Contractors, and Consultants





Gaumer Process is committed to uncompromising integrity and elevated standards of business conduct, especially in our relationships with suppliers, contractors, and consultants. For over the years,

Gaumer Process has created high standards of business conduct and integrity. That reputation is an integral part of our business. Gaumer Process bases supplier relationships on legal and mutually beneficial practices and expects all related parties to adhere to the same standards with their employees and Gaumer Process.

Integrity Guide

To help understand the Gaumer Process commitment to integrity and standards of business conduct, we have prepared a integrity guide that has been broken into four parts:

- Code of Conduct
- Compliance Obligations
- Responsibilities of Suppliers
- How to Raise an Integrity Concern



All related parties are responsible for ensuring that all employees, representatives, and sub-suppliers comply with the standards of conduct Gaumer Process requires.

Section 1: Code of Conduct



Gaumer Process' tenacious commitment to integrity is set forth in company policies, which regulate the conduct of all Gaumer Process employees. Employees must not only follow the "letter" of the company's policies, but also with their feeling.

The "feeling" of Gaumer Process integrity is in Gaumer Process' *CORE VALUES* that each individual employee has made a commitment to follow.

CORE VALUES



- HONESTY
- FAIR
- TRUSTWORTHY



CORE VALUES *Continued*

Each employee is committed to complying with the *Core Values* as follows:

- Abide by the applicable laws and regulations developing our business at a global level.
- Evade all conflicts of interest that arise between work and outside personal affairs.
- Adapt to an environment in which equal employment activities extend to every associate of the Gaumer Process team.
- Excel to achieve a harmless work place and look out for our environment.
- Proper conduct is recognized, appreciated, and represented by all employees.

Section 2: Compliance Obligations

- All employees are obligated to convey Gaumer Process' compliance obligations. A rundown of the key components are as follows:



Improper Payments



Gaumer Process:

- Never provides excessive entertainment or gives substantial gifts to a customer or supplier without approval. It ensures all gifts and entertainment are lawful and unveiled to the other party's employer.
- Does not offer law-breaking political contributions, payoffs, or bribes or any other improper payments to any customer, government appointee, or third party and always follows the law of the United States and other countries concerning this matter.

Improper Payments *Continued*

Examples:

Bribery

Employees, managers, or salespeople of a business may offer money or gifts to a potential client in exchange for business. For instance, a service company was recently accused of offering gifts to an assistant warden in the Prison System in exchange for a contract allowing the company to provide the food services in the state's prisons.



International Trade Controls



Gaumer Process;

- Ensures that all proceedings are examined in accordance with applicable export/import requirements.
- Employees may not take part in any boycott or other restrictive trade practices prohibited or penalized under United States or applicable local laws.
- Comprehends and abides by any international trade control and customs laws and regulations.

International Trade Controls

Continued

Example:

Restrictive Trade Practices

A cartel is a formal (explicit) agreement among firms. It is a formal organization of producers that agree to coordinate prices and production. Cartels usually occur in an oligopolistic industry, where there are a small number of sellers and usually involve a single product or service. Cartel members may agree on such matters as price fixing, total industry output, market shares, allocation of customers, allocation of territories, bid rigging, establishment of common sales agencies, and the division of profits or combination of these. The aim of such collusion is to increase individual member's profits by reducing competition. Competition laws forbid cartels.

Money Laundering Prevention



Gaumer Process complies with all applicable laws that prohibit money laundering. Any employee that identifies any suspicious activity must report it to their management.

Money Laundering *Continued*

Examples:

Irregular funding



One way to keep cash anonymous is to give it to another who is already legitimately taking in large amounts of cash. The intermediary then deposits the money in an account, takes a premium, and writes a check. Little attention is drawn because, for the intermediary, it is a relatively small amount of the usual takings, but for the originator it is all of his takings. This works well for one-off transactions, but if it happens regularly then the checks themselves form a paper trail that can raise suspicion.

Concealment



Gaumer Process:

- Maintains and secures business records of individual consumer information, including computer based information.
- Does not use or divulge consumer information in any way that differs from Gaumer Process concealment policies or with any applicable privacy and protection laws, regulations and treaties.

Supplier Relationships



Gaumer Process only does business with suppliers who comply with both local and federal legal requirements and follows any applicable laws and government regulations blanketing supplier relationships.

Working with Governments



Gaumer Process;

- Is both honest and precise when dealings with government officials and agencies.
- Abides by applicable laws and regulations connected with government contracts and transactions.
- Requires any supplier providing a service on a government project or contract to agree to comply with working with government's policies.

Complying with Competition Laws



Gaumer Process;

- Never enters into contracts or arrangements with its competitors for profit margins, costs, terms and conditions of sale, fix prices, or other facets of the competition for sales to third parties.
- Never offers or enters into any arrangements or contracts with its customers confining resale prices.
- Never offers or enters into any arrangements or contracts with suppliers that restrict the cost of other terms at which Gaumer Process may resell or lease any product or repair to a third party.

Environment, Health, & Safety



Gaumer Process;

- Asks all employees to report to management all spills of hazardous materials, any concerns that products are unsafe, and any potential violation of environmental, health or safety laws, regulations or company practices or requests to violate established procedures.
- Conducts all actions in obedience with all relevant environmental and worker health and safety laws and regulations and operates activities accordingly.

Fair Employment Practices



Gaumer Process integrates equal opportunity, honest conduct and a harassment-free work environment to all employees, co-workers, consultants and other business contacts without concern to their race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status or other features protected by law.

Security and Crisis Management



Gaumer Process;

- Implements extensive preparation to address security of employees, facilities, materials, IT assets and business continuousness.
- Creates and upholds a safe working environment.
- Protects admittance to its facility from unauthorized personnel.
- Protects IT assets from theft or misappropriation.
- Ensures proper business continuity plans are prepared for emergencies.

Conflicts of Interest



Gaumer Process;

- Is lawful and free of conflicts with one's responsibility including business, financial, or other non-work related activities.
- Does not allow personnel to use equipment, information or other property (including office equipment, e-mail and computer applications) to conduct personal or non-Gaumer Process business without prior permission from the appropriate Gaumer Process manager.

Intellectual Property

Gaumer Process:

Values copyrighted information and other safeguarded intellectual property of others; and consults with appropriate guidance for licenses or authorization to use such property.

Identifies and protects Gaumer Process property in ways consistent to the law.

Consults with assistance prior to soliciting, accepting or using proprietary information of outsiders, disclosing Gaumer Process proprietary information to outsiders or permitting third parties to use Gaumer Process intellectual property.



Controllership



Gaumer Process:

- Ensures all financial statements and reports prepared for or on behalf of Gaumer must fairly present the financial position, results of operations, and/or other financial info for the periods and/or dates stated.
- Follows General Accounting Procedures (GAAP), along with all commonly recognized accounting ethics and financial reporting of transactions, estimates and forecast.
- Keeps and reports all Gaumer Process records, including any time records, in an accurate, timely, complete and confidential manner. Gaumer Process only releases records to third parties when authorized to do so.

Section 3: Responsibilities of Gaumer Process Suppliers



Gaumer Process recognizes in today's worldwide regulatory environment it is becoming more challenging, subjecting Gaumer Process and its suppliers to a growing number of regulations and enforcement. Therefore Gaumer Process will only do business with suppliers that comply with all appropriate legal and regulatory obligations. It is expected that all suppliers who conduct business with Gaumer Process complies with their promised responsibilities under any purchase order or agreement and fulfill the standards of business conduct coherent with the "Compliance Obligations" set forth in this Integrity Guide. This commitment to full compliance between Gaumer Process and its suppliers with these guidelines and all appropriate laws and regulations is the cornerstone of a mutually beneficial business relationship.



Responsibilities of Gaumer Process Suppliers

Gaumer Process requires its suppliers, and any other subcontractors, that assist Gaumer Process work with government customers to be truthful and precise when dealing with government representatives and agencies and follow accurately to all compliance obligations linked to government contracts that are mandatory to flow down to Gaumer Process suppliers.

As specified earlier, Gaumer Process expects and requires each Gaumer Process Supplier to observe all applicable laws and regulations.

Unacceptable practices by Gaumer Process Suppliers include:

Unacceptable Practices— Minimum Age

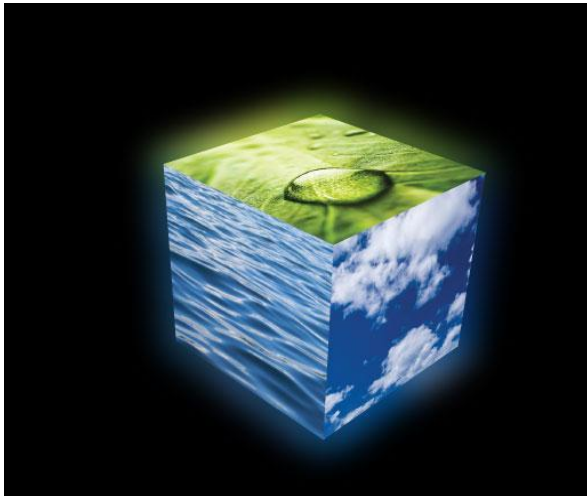


Employing workers younger than sixteen (16) years of age or the applicable required minimum age, whichever is higher.

Unacceptable Practices- Environmental Compliance

The absence of obligation to observing all valid environmental laws and regulations. Evidence that Gaumer Process will consider a lack of commitments include:

- Failure to maintain comprehensive environmental programs.
- Failure to maintain and comply with all required environmental permits.
- Permitting any discharge to the environment in violation of law, issued/required permits, or that would otherwise have an adverse impact on the environment.



Unacceptable Practices- Health & Safety



Failure to provide workers a workplace that meets applicable health, safety and security standards.

Unacceptable Practices- Human Rights



- Failure to honor human rights of Suppliers' employees.
- Failure to observe applicable laws and regulations governing wage and hours.
- Failure to allow workers to freely choose whether or not to organize or join associations for the purpose of collective bargaining as provided by local law or regulation.

Unacceptable Practices- Code of Conduct



Failure to maintain and enforce Gaumer Process policies requiring adherence to lawful business practices, including a prohibition against bribery of government officials.

Unacceptable Practices- Trade Controls & Customs



The transfer of any Gaumer Process technical information to any third party without the express, written permission of Gaumer Process. Failure to comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods, services, software, technology or technical data including any restrictions or use by unauthorized persons or entities, and failure to ensure that all invoices and any customs or similar documentation submitted to Gaumer Process or governmental authorities in connection with transactions involving Gaumer Process accurately describe goods and services provided or delivered and the price thereof.

Section 4: How to Raise an Integrity Concern



Subject to local laws and any legal restrictions applicable to such reporting, each Gaumer Process Supplier is expected to punctually advise Gaumer Process of any Integrity concern involving or affecting Gaumer Process, whether or not the concern involves the Supplier has knowledge of such integrity concern.

How to Raise an Integrity Concern

Define your Concern:

- Who or what is the concern?
- When did it occur?
- What are the important facts?

Prompt reporting is critical-an Integrity concern may be extended by a Gaumer Process Supplier as follows:

By discussing with a Gaumer Process Manager or

By e-mailing Gauravd@gaumer.com

