

Midwest International Standard Products Inc.

CODE OF BUSINESS ETHICS

Policy

Since its creation in 1967, one of the most important aspects of Midwest's success has been integrity in its dealings with customers and vendors. All Midwest personnel have a responsibility to their fellow employees, customers, and vendors to act prudently and ethically. Ethical conduct has been and continues to be the very foundation of our company.

Midwest personnel are expected to assume personal responsibility and accountability for understanding relevant laws, regulations, and contract requirements, and for ensuring compliance. Midwest will fully comply with all such laws and contract requirements, as well as with its own high standards of integrity and quality.

The purpose of this code is to reiterate longstanding company policies regarding the principles which govern the company's business dealings. It is intended to complement, where necessary, and provide a general framework to the provisions of other specific policies or regulations.

General Responsibilities

1. Individual Responsibility

Ethics and integrity are the responsibility of each individual. Therefore, every employee and partner is responsible for ethical conduct consistent with this code and with Midwest policies. All personnel in supervisory positions must assume responsibility for ensuring that their conduct and the conduct of those they supervise comply with this code.

2. Business Activities

Business activities undertaken for or on behalf of Midwest with customers and vendors must reflect the highest standards of honesty, integrity, and fairness. Personnel must be especially careful to avoid even the appearance of misconduct or impropriety.

Compliance with Laws

Midwest will transact its business in compliance with the laws of the jurisdictions in which it does business. In any instance where company policies appear difficult to interpret or apply, or where there may appear to be some conflict with Midwest principles, its personnel should make aware through the proper channels as listed below. Questions about interpretation or application of laws and regulations should be referred to the human resources department.

Compliance with Standards of Integrity and Quality

Midwest recognizes that it must earn and maintain a reputation for integrity that includes, but is not limited to, compliance with laws and regulations and its contractual obligations. Even the appearance of misconduct or impropriety will not be tolerated. Midwest must strive at all times to maintain the highest standards of ethics. Frequently, Midwest business activities are not the subject of specific laws or regulations. In these instances, rules of fairness, honesty, and respect for the rights of others will govern the conduct of personnel at all times.

This policy requires each individual to conduct company business transactions with the utmost honesty, accuracy, and fairness. Each situation shall be judged according to this standard. No unethical practice shall be resorted to on the grounds that it is customary outside of Midwest or that it serves other worthy goals.

Expediency should never compromise integrity.

Reporting of Suspected Violations

1. Management Channels

Employees should report suspected violations of applicable laws, regulations, contract requirements, or any aspect of this code. Such reporting should normally be made, initially, through standard management channels, beginning with the immediate supervisor or the human resources department.

2. Alternate Channels

Alternatively, employees may report suspected violations or problems directly to the Director of Operations or President and CEO.

3. External Channels

Persons outside Midwest, who wish to report their concerns, may do so either by writing directly to the President and CEO, or by contacting the human resources department by phone, email, or letter.

4. Confidentiality and Protection of Whistleblowers

Such reports may be made confidentially, and even anonymously, although the more information given, the easier it is to investigate the report. Raising such concerns is the responsibility of Midwest personnel, and any information and/or its source will be treated in confidence. Persons reporting breaches or suspected violations of the code are entitled to be informed of the results of any subsequent investigations. Midwest will not, knowingly, take any action harmful to any employee or trustee for making a complaint in good faith pursuant to this policy.

Conflict of Interest

Employees should be sensitive to situations which could raise questions of potential or apparent conflicts between personal interests and the company's interests. As part of the Midwest community, employees should consider themselves as persons in positions of trust, and all employees should conduct themselves accordingly. Employees must be particularly aware of situations where there exists a conflict between the private interests of a person and the general employment responsibilities of a person. Such conflicts can involve personal or family business interests, investments, present or prospective employees or relatives.

Confidential Information

Midwest is entrusted with many kinds of confidential, proprietary, and private information. Midwest personnel must respect this fact and also be familiar with the company's Intellectual Property Policy. It is imperative that those who have access to this information do not make any unauthorized disclosures of the information, either during or after employment.

Gratuities and "Kickbacks"

Midwest personnel shall not give, offer, or promise anything of value to any prime contractor, subcontractor, supplier, or others for the purpose of improperly obtaining or receiving favorable treatment. Nor shall any Midwest personnel solicit or accept anything of value from any contractor, subcontractor, supplier, or others for such a purpose.

Financial Reporting

All company accounts, financial reports, tax returns, expense reimbursements, time sheets, and other documents, including those submitted to external agencies, must be accurate, clear, and complete. All entries in company books and records, including departmental accounts and individual expense reports, must accurately reflect each transaction.

Consequences of Violations of Midwest Policies

Each person is responsible for ensuring that his or her own conduct and the conduct of anyone reporting to him or her fully complies with this code and with Midwest's policies. Violations of this code or any fraudulent acts will result in the taking of appropriate disciplinary action, up to and including, discharge from employment. Conduct representing a violation of this code may, in some circumstances, also subject an individual to civil or criminal charges and penalties.