

Kimball Electronics, Inc. Code of Conduct

The Kimball Electronics Code of Conduct demonstrates the high value we place on ethical standards related to the treatment of our people, the belief in and provision of safe and healthy working conditions, the treatment of our environment, and our overall business ethics. The high standards set forth in our Code of Conduct guide us to make the right decisions enabling us to widen our global outreach and maintain our recognized standing as a good global citizen. At the core of our Code of Conduct are our Guiding Principles , which serve as our moral compass.

1) How we treat our employees

a) Employee rights

All employees are voluntarily hired for manufacturing positions and must be at least 18 years of age. Student workers under the age of 18 will not perform work that is likely to jeopardize their health or safety. Workweeks are not to exceed the maximum hours set by local country law. Workers shall be allowed at least one day off every seven days. All employees are compensated in compliance to wage laws, and for each pay period, employees will receive a comprehensible wage statement. Under no circumstances will an employee ever be docked in base pay as a disciplinary measure. To raise awareness of how our human rights beliefs are deeply rooted in our Guiding Principles, we have adopted a Global Human Rights Policy that we have incorporated into this Code of Conduct.

b) Employment

Kimball Electronics recognizes that diverse, talented and engaged employees are a key competitive advantage. Kimball is committed to building a workforce that consists of the characteristics and attributes that best serve our markets and the communities in which we do business. The varied experiences, skills and qualifications of our people enhance the company's overall effectiveness. We promote an environment where each employee is valued, respected, and treated with dignity. We believe a wide array of perspectives, resulting from a diverse culture, promote innovation and build success.

We do not tolerate any sort of discrimination or harassment by anyone in the company toward any other person, whether or not they are also an employee. For employment practices from recruitment to separation, we do not discriminate based on age, race, skin color, social background, religion, ethnicity or national origin, gender, gender identity and expression, disability, genetic information, sexual orientation, political affiliation, union membership, marital status, status as a protected veteran, caste, property, birth, or any legally protected classification in accordance with local country laws. Employees with disabilities are provided reasonable accommodations.

c) Communication /Open Door Policy

We believe that to be successful, the free exchange of ideas, information and discussions with all employees is critical. Open, honest, non-defensive communication facilitates the continuous improvement of our company. Employees are encouraged to express their ideas, concerns, suggestions and comments on a personal basis with anyone in management at any time and without fear of retaliation.

Our Guiding Principles state that the relationship between employees and the Company is built on “mutual trust, personal integrity, respect for the dignity of the individual, a spirit of cooperation, and a sense of family and good humor.”

Kimball recognizes and respects the rights of employees to freely associate, organize and bargain collectively in accordance with the laws of the countries in which they are employed. Written contracts are in place where legally required.

Our open door policy should serve as a process for escalation of a grievance related to employment at Kimball Electronics. The HR Manager for the respective location will serve as the primary point of contact for the grievance process and will include the management chain for review of relevant situations brought forth as a grievance. KEI executive leadership will serve as the final review and decision maker where needed in such cases.

d) General Conduct

Kimball believes that all employees deserve to work in an environment that strives to be respectful, values diversity, is safe, and promotes effective teamwork. Good judgment, responsible conduct and respect for others are basic expectations of all employees. Each employee is responsible for performing to those expectations. Employees are also expected to comply with any business unit/location-specific conduct policies. Misconduct is addressed through counseling, coaching and/or progressive discipline, up to and including separation.

e) Personal Growth and Development

Kimball Electronics supports the education, personal growth and development of our employees. We support training and education, enhancing specifically identified skill and personal development needs that link closely to better satisfying our customers and improving company performance.

Employees have accountability for their continued skill and knowledge development. They are encouraged to collaborate with their manager to identify and execute their specific personal development plan. Examples include projects, on-the-job training, seminars, technical training courses, professional certifications, college courses, or college degrees.

f) Incentive Philosophy

Kimball Electronics strives to have all employees tied to an incentive plan linked to their impact on company performance.

2) Healthy Work Environment

Kimball strives to provide all employees with a safe place to work. Employees are expected to work safely, follow safety policies and regulations, report unsafe conditions, and wear appropriate safety equipment. Kimball Electronics strives to create safe and secure workplace environments with an injury-free culture, truly believing that all injuries can be prevented. The safety policy at Kimball Electronics emphasizes that safety is a value—unlike priorities, values never change. Management commitment and employee involvement play a key active role in designing and implementing safety programs for their respective workplaces. Kimball processes are designed to enhance a culture where each employee accepts responsibility for their own personal safety, as well as the safety of their coworkers. Kimball promotes awareness and education among employees with the goal of eliminating exposures, or risks, that create unsafe conditions and behaviors

a) Workplace Safety

Procedures have been implemented to safeguard against employees becoming overexposed to any chemical, biological and physical agents. All machines have also been evaluated for safety hazards, and necessary measures have been taken to ensure that employees are protected from those hazards.

- ***Drug Free Workplace***

Kimball Electronics recognizes the value of each employee to the overall success and effectiveness of the Company. We are committed to protecting the safety, health and well-being of all employees and other individuals in our workplace. Alcohol abuse and drug use pose a significant threat to our goals.

- Kimball has no intention of interfering with the private lives of its employees unless involvement with alcohol or other drugs on or off the job affects job performance or employee safety.
- Kimball encourages employees to voluntarily seek help with drug and alcohol problems.

- ***Tobacco/Nicotine-Free Workplace***

We maintain a tobacco/nicotine-free work environment. The use of tobacco/nicotine products including ECigarettes and Vapor Pens is not allowed anywhere within our facilities. Tobacco/Nicotine use on Kimball property is only permitted in specifically designated areas. This applies to employees and visitors, with no exception.

- ***Workplace Violence***

Because Kimball Electronics is concerned with the safety and security of its employees, we do not tolerate any acts or threats of violence made by any employee against another employee's life, health, well-being, family or property. Any such acts or threats of violence, whether made directly or indirectly, by words, gestures, or symbols, infringe upon the rights or obligations of Kimball Electronics to provide a safe work environment for its employees and customers. Any person violating this policy will be subject to appropriate disciplinary action, up to and including separation. As an additional measure of safety, no firearms or weapons will be allowed in company buildings. Properly authorized law enforcement personnel are excluded from this policy. Employees are encouraged to report any complaints to your Human Resource Manager. All communications will be kept as confidential as possible.

b) **Employee Safety**

We consistently strive for an injury-free culture and believe that all injuries can be prevented.

Roles that require physically demanding work are specifically identified and communicated to employees. It is the responsibility of all employees to report any on-the-job injury, safety incident or illness, no matter how minor, to the location Safety Manager or local HR, so that appropriate incident reports can be completed and any safety hazard can be corrected. Any employees injured at work may be eligible for worker's compensation benefits.

Plans are established to safeguard employees in case of emergency situations.

Employees are guaranteed access to clean toilet facilities, clean water and sanitary food preparation, storage, and eating facilities.

3) Citizenship and Social Responsibility (Environment)

Kimball is dedicated to continued excellence, leadership and stewardship in protecting the environment, the health and safety of our employees and the members of the communities in which we work and live. Our commitment is to exceed customer expectations and to fully comply with Country, Federal, State and Local environmental regulations.

Within the design and production of product, in collaboration with our customers and suppliers, we strive to eliminate pollution generated at the source, to use renewable materials and to maximize the reclamation and recycling of materials to minimize adverse impact on the environment.

For more information regarding Kimball Electronics' sustainability efforts, click [here](#).

4) Business Ethics Standards

Aligned with our Guiding Principles, Kimball Electronics is committed to ethical practices in all aspects of the business. It is an expectation that all employees will conduct themselves with honesty and integrity in accordance with this commitment spelled out in the Policy below: **Kimball Electronics' Business Ethics Policy**

a) Bribery and Kickbacks

- Employees may not give anything of value to existing or potential customers or suppliers as an inducement for an award of business. Meals, gifts or entertainment of a nominal value may be given or received as an appropriate exchange of business courtesies. Sound judgment is required in regards to this, and if local laws or recipient's company prohibits meals, gifts or entertainment of a nominal value, then do not engage in it.

b) Political Involvement

- Employee involvement in the political process as individuals on their own time and with their own funds is a matter of personal choice. Kimball's political contributions and lobbying activity are controlled corporately and should not be represented by other than authorized personnel.

c) International Business Relationships

- It is expected that business with customers, suppliers, employees or government officials outside the United States be conducted not only in accordance with the laws of any particular foreign country, but also in accordance with applicable U.S. laws (such as the Foreign Corrupt Practices Act "FCPA") as well as Kimball's ethical principles, regardless of any local custom or practice.
- The FCPA, other U.S. laws, and similar laws of other countries prohibit employees, on behalf of Kimball, from directly or indirectly making, promising, authorizing or offering anything of value to a government official, representative or employee, political party, or any candidate for political office. A governmental official includes any person acting in an official capacity on behalf of a government, agency, department or institution, such as a business with government ownership or control. The officers and employees of certain foreign companies with which we do business may be "foreign government officials" if the company is owned or controlled, in whole or in part, by a foreign government.
- Employees should not offer anything of value (e.g., money or monetary equivalents, gifts, travel, entertainment) directly or through third persons (including but not limited to third parties like suppliers, resellers or distributors), to anyone (including governmental authorities) with the intent to obtain an improper advantage in selling goods and services, conducting financial transactions, or presenting the Company's interest. All countries prohibit bribery of their own public officials, and many also prohibit the bribery of officials of other countries. Kimball goes beyond these legal requirements and prohibits improper payments in all activities, both with governments and the private sector.

d) Meals, Gifts and Entertainment

- Meals, gifts or entertainment of a nominal value may be given or received as an appropriate exchange of business courtesies. Sound judgment is required, recognizing the potential for the appearance of impropriety. As always, if local laws prohibit this activity, or the recipient's company does not permit it, Kimball representatives should not engage in it.

e) Conflicts of Interest

- Employees should avoid situations that may present, or present the appearance of, a conflict of interest.

These occur when an employee's personal interest appears to, or does, conflict with the interests of Kimball. Such conflicts could occur when an employee or a family member encounter situations which could include but are not limited to the following:

- Gains a substantial personal financial interest in a Kimball supplier/customer /competitor.
- Engages in a significant personal business transaction directly with Kimball, or discloses Kimball business opportunities to a third party.

- Engages in significant outside employment such that it interferes with the conscientious performance of his/her duty as a company employee. This would include use of Kimball time or resources to solicit for or otherwise further another business or employment activity.
- Participation in civic, charitable, or other non-business activities at work, to the degree that they interfere with the employee's job duties.
- There are many other situations in which an employee could have a conflict of interest. Any concerns or questions should be discussed by the employee with his or her manager or another appropriate Kimball leader for guidance.

f) Insider Trading

- Trading in Kimball stock while possessing material, non-public information is prohibited. This prohibition covers not only the employee, but family members as well. Disclosing such information to others is also prohibited. Please refer to Kimball's Insider Trading Policy for more detailed information.

g) Role Conflicts

- Conflicts of interest may also be created by relationships with fellow employees. These conflicts should also be avoided. Such conflicts could include, but are not limited to, the following:
 - i Romantic relationships (as detailed in Kimball's Sexual Harassment Policy in the Employee Handbook).
 - ii Hiring related persons - Kimball does not discourage the tradition of family service and we may employ persons related to Kimball employees, but careful consideration in this area must be given to fairness, avoidance of direct or indirect reporting relationships, and any perception of favoritism.

h) Government Contracting

- Whenever Kimball does business with the U.S. Government, Kimball will comply with all applicable regulations regarding government contracting. Ethical conduct in compliance with government regulations is paramount, and each employee involved in this area is expected to be knowledgeable regarding the specific ethical and regulatory requirements for federal government contracting.

i) Personal Use of Company Property

- All Kimball resources, including the time of our employees, material, equipment, and proprietary information should be used for Kimball business purposes only. All proprietary information must be held in strictest confidence.

j) Fraud

- Simply put, Kimball prohibits all fraud, including dishonest and fraudulent acts, embezzlement, forgery, theft, falsification of company financial statements or records and the like.

k) Espionage

- Kimball will acquire its competitive intelligence information through legitimate and ethical means. Any attempt to gain competitive information through improper sources or by giving something of value is strictly prohibited.

l) Financial Matters

- Kimball will have the utmost integrity in its financial reports. Kimball has established accounting procedures and internal accounting controls, and it undergoes regular internal and external audits to help ensure full, fair and accurate disclosure in its financial statements and reports filed with the United States Securities and Exchange Commission. Kimball will comply with all applicable governmental laws, rules and regulations.

m) Social Media and Employee Privacy

- The expectations for functioning in an electronic world reflect the same values, ethics and confidentiality obligations required in any other interaction in the workplace. You are responsible for what you publish on Social Media, so think about the content and assume that everything you publish on

line lives forever. Maintain your privacy by not publishing anything you wish to keep private. Never publish Kimball Confidential Information.

n) Antitrust

- It is Kimball's policy that each employee complete vigorously and ethically in the conduct of the Kimball's business and always be in compliance with the U.S. antitrust laws. Employees can review the Company's Antitrust Compliance Policy Guide and should follow its provisions. Employees can contact local HR department or company legal department with questions.

o) Acceptance of Personal Responsibility

- Ultimately, all employees must be guided by a desire to do what is right and consistent with Kimball Electronics values and guiding principles and a strong personal sense of right and wrong. In this way, we will be the high integrity company described in our Guiding Principles.

(a) Fair Competition

(i) Kimball promotes competition in the market place, and recognizes it as a key part of the advancement of the electronics manufacturing industry. Kimball practices fair and ethical business techniques in order to play a role in creating a fair and competitive marketplace.

(b) Disclosure of Information

(i) The Company will have the utmost integrity in its financial reports. Kimball has established accounting procedures, internal accounting controls, and undergoes regular internal and external audits to help ensure full, fair and accurate disclosure in its financial statements and reports filed with the U.S. Securities and Exchange Commission. The company will comply with all applicable governmental laws, rules and regulations.

p) Sourcing of Minerals

- Kimball Electronics, Inc. is committed to ethical practices and compliance with all applicable laws and regulations. While we do not source these metals directly, they may exist in the materials and components we source. We are therefore committed to working with our customers and suppliers to responsibly source the materials and components we use in manufacturing our customers' products which may contain these minerals. To comply with the SEC reporting regulations relating to conflict minerals, Kimball requires chain of custody declarations from our suppliers to verify the origin of the conflict minerals contained in their products. See our [Conflict Minerals Policy Statement](#).

5) Privacy

Kimball maintains a high level of integrity and confidentiality for all information regarding employees, customers and suppliers. All employees are trained on information security and policies have been enacted to ensure that Kimball complies with all information security laws and regulatory requirements.

a) Employee Privacy and Protection

Kimball Electronics takes seriously one's right to privacy. However, to protect our employees, property and other assets, Kimball Electronics reserves the right to search. Any employee, or individual entering Kimball property or working in an offsite commercial location while performing services for the company, is subject to a search. A person's property, equipment, and storage areas including but not limited to, clothing, personal effects, vehicles, desks, cabinets, lockers, electronic devices, boxes or bags, can be inspected. Items employees do not want to have inspected should not be brought to work.

b) Employee Data Privacy Policy

The privacy and security of the personal data collected from employees is a priority to Kimball Electronics, Inc. (including our affiliates and subsidiaries). It is equally important to us that they understand how we handle this data. This policy includes any separate privacy notices that may provide more detail regarding personal information we collect, why we need that information, and choices employees may have about the ways we use that information. For example, from time to time, they may be asked to expressly consent in writing to

certain additional terms. This separate agreement will supplement or amend this policy, but only with respect to the matters governed by such separate agreement.

By virtue of their employment, employees expressly acknowledge that you have read, understand and agree to all of the terms of this Privacy Policy, as outlined below and as it may be modified by us from time to time without prior notice.

Collection of Data

To conduct business globally and comply with government regulations (employment, tax, insurance, etc.), we collect various personal and other data depending on an employee's employment responsibilities, citizenship, location of employment, and other factors. Such data may include his or her name, user ID's, phone numbers, email address, mailing addresses, banking and other financial data, government identification numbers (i.e., social security numbers, tax payer ID's, driver's license, etc.), date of birth, gender, race, ethnicity, health and disability data, family-related data (i.e., marital status, personal and health-related data on family members, etc.), trade organization data, and any other necessary data. If an employee sends any unsolicited data to Kimball by any means that means he or she explicitly consent to storage, destruction, processing, disclosure, and/or any other use by Kimball or any subcontractor of Kimball.

Use of the Data We Collect

We may use data as follows:

- to identify an employee
- to communicate with an employee
- to comply with human resource requirements
- to comply with government regulations
- to provide employee benefits (compensation, health insurance, expense reimbursements, etc.)

Disclosure of Data:

We disclose personal information in the following circumstances:

- Legal requests and investigations – We may disclose any data about an employee when, in our opinion, such disclosure is necessary to prevent fraud or to comply with any statute, law, rule or regulation of any governmental authority or any order of any court of competent jurisdiction.
- Third-party service providers – We may, from time to time, outsource some or all of the operations of our business to third-party service providers. In such cases, it will be necessary for us to disclose data to those service providers. In some cases, the service providers may collect data directly from an employee on our behalf. We restrict how such service providers may access, use and disclose this data.
- Agents: We employ other companies and individuals to perform functions on our behalf. Examples include processing compensation, providing employee benefits, and performing legal and other professional services. These agents have access to employee data as needed to perform their functions, but they are not permitted to use it for other purposes.
- Business Transfers: As we continue to develop our business, we might sell or buy companies, subsidiaries, or business units. In such transactions, data generally is one of the transferred business assets but remains subject to the promises made in any pre-existing privacy statement (unless, of course, the person consents otherwise). Also, in the unlikely event that Kimball or all of its assets is acquired, employee data may be one of the transferred assets.
- Protection of Kimball and Others: We release data when we believe it is appropriate to comply with the law; enforce or apply our policies and other agreements; or protect the rights, property, or safety of Kimball, our employees, or others. Obviously, however, this does not include selling, renting, sharing or otherwise disclosing personally identifiable data from employees for commercial purposes in violation of the commitments set forth in this Privacy Statement.

Updating and Accessing Personal Data

Employees must immediately update their data when and if it changes so that we can maintain accurate data about them in order to perform necessary activities such as paying you and providing you with benefits. Although an employee may change personal data, we may maintain such prior data about them. Therefore, he or she should not expect that all historical data will be removed from our databases at the time they notify us of changes.

All employees may access and change most of their personal data through Employee Self Service (ESS); otherwise, to access, change, remove, or opt out of further use of data, Employees may contact their business unit's Human Resources department. Non-U.S.-based employees may access, change, remove or opt out of further use of their personal data by contacting their business unit's Human Resources department.

Retention of Your Personal Data

Upon an employee's separation, his or her personal information shall be retained and destroyed according to our document retention policy and in compliance with applicable laws and regulations.

Security of Your Personal Data

- We employ security measures and technologies, such as password protection, encryption, physical locks, etc., to ensure the confidentiality of your personal data. If an employee is authorized to have access to the personal data of others, it is important that he or she takes appropriate safeguards to protect this personal data. Examples include:
 - Paper and other hard copies containing personal data should be secured in a locked location when not in use.
 - Computers and other access points should be secured when not in use by logging out or locking.
 - Passwords and user IDs should be guarded and must not be shared.
 - When no longer necessary for business purposes, paper and hard copies should be immediately destroyed using paper shredders or other approved devices.
 - Do not leave copies in unsecured locations waiting to be shredded or otherwise destroyed.
 - Do not make or distribute unauthorized copies of documents and other tangible mediums containing personal data.
 - Electronic files containing personal data should only be stored on secured computers and not copied or otherwise communicated to unauthorized individuals within or outside of Kimball.

Violations of Policy

Compliance with this Privacy Policy is important to Kimball. Any potential violation of these privacy policies should be reported to the Privacy Compliance Manager at keiprivacy@kimballelectronics.com. Failure to follow these privacy policies may result in discipline, up to and including separation, of the employee. Any questions or suggestions regarding these policies may also be directed to the Privacy Compliance Manager at keiprivacy@kimballelectronics.com.

Kimball Electronics: EU-US Standard Contract Clauses

Kimball Electronics and its E.U. subsidiaries have executed Standard Contract Clauses assuring any personal information from personnel in the E.U. subsidiaries will be protected as required under the General Data Protection Regulation (GDPR) for the collection, use, and retention of personal information transferred from the European Union to the United States.

As further explained in KEI's Privacy and Security Statement, we encourage you to contact us [keiprivacy@kimballelectronics.com] should you have a privacy-related query. For any complaints that cannot be resolved with KEI directly, KEI has chosen to cooperate with EU data protection authorities (DPAs) in relation to such unresolved complaints. Please contact us to be directed to the relevant DPA contacts. KEI is subject to the investigatory and enforcement powers of the US Federal Trade Commission (FTC).

Kimball Electronics: General Data Protection Regulation (GDPR) - European Union only

Kimball Electronics Group, LLC may receive and control personal data provided by you. We only collect personal data voluntarily offered by you or requested as employees of Kimball and only use such data as appropriate to the role or interactions you have with Kimball.

Kimball needs to collect and control your personal data to conduct essential employment related activities or, the in case of third party personal data, to carry out functions of our business relationship with you.

All personal data is maintained in a way to restrict third party access except as specifically granted (such as third party payroll processing) or as required by law. We have a data protection system in place to manage the effective and secure processing of your personal data.

We only keep your data for as long as a) you are an employee, b) in the case of non-employee data, you are involved in the business relationship with Kimball, or c) as required by law.

Thank you for providing your personal information to Kimball. We use your name, address, email, phone number and other personal information for employee-related reasons only or to more effectively communicate with non-employees. If you have any concerns about the uses of your personal data, please email KEIPrivacy@kimballelectronics.com. Additional information on Kimball Electronics Poland, Sp., z.o.o. and Kimball Electronics Romania, SRL's country specific guidelines are found on each companies' facility page in English and the local language.

The GDPR offers you certain rights regarding your personal data given to Kimball. You have the right to see the data we hold and correct any errors. As may be limited by our legitimate business needs to hold your data, you may request that Kimball delete your personal data from its systems and the system of any third parties with whom Kimball has provided your data. If you wish to exercise any of these rights or request Kimball to investigate how your data has been used, please email: KEIPrivacy@kimballelectronics.com. If you are not satisfied with our response or wish to speak with a country specific data personnel, please contact Kimball Electronics Poland or Romania data trustees.

c) Information Management Responsibility and Systems Use

- Information and information systems including e-mail, telephone/voicemail, internal computer network and Internet access are intended for business use only. As stated in part when accessing Kimball systems, "Information systems, data and information are company assets for Kimball business use only. All users are obligated to safeguard and responsibly use these assets."
- Appropriate systems use and information access are the responsibility of all employees. Access controls, such as userids and passwords, are in place to ensure confidentiality, accountability and integrity. Employees should not use unauthorized codes, passwords, software or other means to gain access to systems or information and should not disclose these codes or passwords to others. Also, employees should take precautions to protect company data on portable devices (such as laptop computers, smartphones, etc) that can be easily lost or stolen.

- Kimball Electronics reserves the right to monitor systems used to enforce this policy. All emails, voicemails, Internet use, social media, and data files are subject to review by management. Employee use of these Kimball systems and/or use of personal devices/tools for business purposes is considered consent for such review. Personal passwords may be overridden for these purposes.
- Under no circumstances may any systems be used to send or receive materials which violate any Kimball policies. All actual or suspected instances of information theft, causing an information security breach, or systems abuse need to be reported to HR or IT management. Disciplinary action, up to and including separation of employment, may occur due to an employee causing an information security breach, or an employee's inappropriate usage.
- There may be occasions to use these systems for personal use. Incidental, personal use is permitted so long as it does not interfere with productivity, job performance, consume Kimball resources, interfere with the activities of other employees, violate any Kimball policy (such as the Non-solicitation and Discrimination/Harassment-Free policies), violate any government law, result in disclosure of confidential information, or reflect poorly upon Kimball Electronics. All such determinations will be made at the discretion of Kimball management.

6) Reporting Violations

If employees have any questions or wish to report a violation of this policy (including regarding an accounting, internal control, or auditing matter), they may notify any supervisor or manager with whom they feel comfortable discussing the problem, to Human Resources, or to the Chief Compliance Officer (phone 812-634-4748). In addition, an anonymous, confidential, third-party ethics "hotline" reporting system has been established. This can be accessed 24 hours a day, 7 days a week. The site has been translated to your language of choice. You can make a report via:

1. [The Kimball Electronics Intranet for Employees](#) – go to “Ethics” at the bottom of the KE home page portal. Click “Ethics Hotline.”
2. The Internet – go to <https://hotline.kimballelectronics.com/> Select your language at the top. Click “Report an Incident” and complete the required information to submit your report.

All reports will be promptly investigated and there will be no retaliation for making a report or cooperating with an investigation. Violation of this Business Ethics Policy is subject to disciplinary action up to and including separation.