



## CODE OF BUSINESS ETHICS AND CONDUCT

Shore Solutions, Inc. is responsible for conducting business in strict compliance with all applicable laws and regulations, and it is the company's policy to do so. Shore Solutions, Inc., therefore, expects employees to act under the highest standards of business ethics both on and off company premises to avoid any appearance of impropriety and to observe all applicable laws and regulations while conducting business on the company's behalf.

As an employee of Shore Solutions, Inc., you are to abide by the spirit as well as the letter of this Code. Employees are expected to cooperate with all inquiries and investigations concerning possible or suspected violation of this Code. The only exception is if you are informed that your participation is voluntary at the time of the investigation. Any employee's failure to fulfill their responsibilities under this Code may result in disciplinary action, up to and including immediate termination of employment.

### Ethical Standards

Shore Solutions, Inc. is committed to conducting business fairly and openly within the spirit and the letter of the law, with the highest regard for customers, the community, and employees. The company's success depends on employees' knowledge, skills, and abilities as well as their performance of work with sound judgment, self-discipline, common sense, and integrity. As such, employees are required to maintain and uphold the following common ethical standards in all aspects of their work:

- To always understand that we are supporting our heroes utilizing the resources of taxpayers, and therefore, we will support every requirement ensuring we provide the best price and value;
- To consistently pursue company objectives in all that you do and in a manner that does not conflict with the integrity of Shore Solutions, Inc., or the public interest;
- To be truthful and accurate in performing job functions;
- To protect confidential information as defined in this handbook;
- To observe all laws, regulations, ordinances, and rules applicable to the operation of the business;
- To maintain honest and fair relationships with all company vendors;
- To ensure quality and value in the company's products/services and relationships with customers and vendors;
- To avoid situations that may engender or create conflict between the personal interests of employees and the exercise of discretionary decisions on behalf of the company during your employment.



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### Conflicts of Interest

Shore Solutions, Inc. insists on the undivided loyalty of all employees, including management and non-management staff, in the performance of all job functions. Therefore, employees must not engage in any conduct, avoid situations that would create an actual or potential conflict of interest in performing their job, or create the appearance of such a conflict. Conflicts of interest arise in work situations when an employee's personal activity or personal interest is contrary to the company's interests. These personal activities or interests may influence the employee's judgment, causing the employee to make decisions on behalf of the company based upon the potential for personal gain rather than in the company's best interests.

To prevent conflicts of interest, the following behavior is deemed unacceptable and unethical, except to the extent the law provides otherwise:

- Receiving or giving of merchandise, money, services, travel, accommodations, or lavish entertainment that might appear to have been given to influence a business decision. Gifts offered or received at any time in your capacity as an employee or representative of the company that is of more than minimal or token value shall not be accepted and shall be returned to the sender with an appropriate explanatory note or letter.
- Maintaining a personal, business, or financial relationship with a customer or vendor where the employee has control or influence over the company's relationship with that customer or vendor. For example, employees should not borrow from or lend personal funds to a customer or vendor of the employee's division.
- Using information developed or learned on the job for personal or familial benefit. This includes the use of company databases, financial information, and intellectual property.
- Maintaining outside directorship, employment, or political office that might appear to or conflict or compete with an employee's responsibilities.
- Conducting company business with or using position or authority to influence the company to conduct business with family members.
- Unauthorized sharing of Confidential Information, as defined in this handbook, or proprietary company-related information with business associates or representatives of other companies

The list above serves only to illustrate sources of possible conflicts of interest and does not constitute a complete list of all the situations that may result in a conflict of interest. Ultimately, it is the responsibility of each employee to avoid any situation that could affect their ability to judge situations independently and objectively on behalf of the company and any situation that could appear to be a conflict of interest. In addition, it is important to note that conflicts of interest can amount to violations of criminal law under certain circumstances. Any doubts should be resolved in discussion with your manager, VP of Contracting and Compliance, or the Director of Operations.





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### Employment of Relatives and Significant Others

To avoid conflicts of interest and promote stability and goodwill in the workplace, we usually don't hire or transfer relatives into positions they supervise or positions where another close family member supervises them. We also try to avoid placing them in positions where they work with or have access to sensitive information about family members. The same general considerations apply if two employees marry or become involved in a domestic partner relationship. If supervisory, security, morale, safety, or other conflict results from the relationship, we reserve the right to use our discretion in hiring and placing employees in a manner designed to avoid these concerns. To resolve the conflict, one of the employees may be transferred or terminated if necessary.

The term "relatives," as used in the preceding paragraph, refers to a spouse or domestic partner, parents, legal guardians, siblings, children (natural, step-children, or adopted), grandparents, grandchildren, or current in-laws. This Code also applies to significant others. Additionally, suppose a conflict or appearance of a conflict arises because of a dating relationship, at our sole discretion. In that case, the conflict may be resolved by transferring one or both employees or termination of employment. There may be other considerations or restrictions based on job requirements and situations specific to your company. Check with your manager for clarification.

### Recognizing and Reporting a Conflict

All employees must pay close attention to possible violations of the Code of Business Ethics and Conduct, whether they occur because of an oversight or intention. Any employee aware of potential violations should notify the VP of Contracting and Compliance or the secondary point of contact, the Director of Operations. You must make a disclosure "Whistleblower Policy, Page 2".

If you are not sure whether there is an ethical problem, it is better to ask. Here are some signs to watch for:

- You feel uncomfortable about a business decision or about something you've been asked to do at work.
- You have witnessed a situation involving a business decision that made you or someone else feel uncomfortable.
- If a business conflict were revealed to the public, you feel that the company would be embarrassed or face legal implications.
- Ask yourself whether a reasonable person with your knowledge would question your impartiality? (You may consult with the VP of Contracting and Compliance).





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### Violation of the Code

Violations of this Code will be grounds for discharge or other disciplinary action, adapted to the circumstances of the particular violation. Disciplinary action will be taken against individuals who authorize or participate directly in a violation of the Code. Disciplinary action also may be taken against any of the violator's managerial superiors, to the extent that the circumstances of the violation reflect inadequate supervision and leadership by the superior. Compliance with the Code will be considered in the evaluation of each individual's overall performance.

### Prohibition Against Retaliation

If an employee or applicant believes that he or she has been retaliated against for disclosing information regarding misconduct under the Code, he/she should file a written complaint with the VP of Contracting and Compliance or with the secondary point of contact, the Director of Operations. In addition, company policy encourages employees to come forward with any safety, ethical, or legal concerns. Retaliation against those who bring forward these types of related concerns or complaints will not be tolerated.

