

CODE OF CONDUCT AND ETHICS

Integrity, Teamwork, Commitment and Excellence!

- Integrity is the character and power of honesty. We build and strengthen our reputation through trust. We hold ourselves to
 the highest level of integrity and ethical behavior. We do not engage in activities that create conflicts of interest between our
 employees, venders, customers or our community. We do not accept gifts or favors. Every employee of Sims Machining
 must avoid any situation in which their obligation to the Company competes with their own financial interest, obligation to
 another company, government body or desire to assist relatives or friends.
- Teamwork is the key of our success. We have been in business for 39 years and we owe it to a team work environment and our employees. We offer a fair working environment that follows all labor laws. We treat people fairly and prohibit discrimination in any form (gender, age, ethnicity, nationality, religion, disability, political affiliation or sexual orientation) from our employees and expect the same professionalism from our venders and customers. We believe in a workplace that is free of intimidation and harassment of any kind.
- Commitment is our responsibility to our employees, customers and our community. We focus on the needs of our customers
 and expect each of our employees to do the same. We safeguard our confidential information and require confidential
 agreements with all our employees, venders and customers. We expect all our employees to use good judgement and avoid
 any communication, disclosure or interaction that might disparage, defame or damage our reputation and the reputation of our
 customers. We use electronic communications technology responsibly and professionally. We respect personal privacy and
 take appropriate measures to ensure the safeguard, security and confidentiality of company records that are held by Sims
 Machining, LLC.
- Excellence is the power of Quality. We take pride in what we do and what we produce. We are passionate about our people, our product, our service and our relationships with our community. We focus on producing the best product for our customers, while establishing a work environment that supports our community. We compete fairly and advocate for free trade and follow international trade laws.

Health, Safety and Environmental Issues.

We strive to protect the health and safety of ourselves as well as others. We have safety training and procedures to protect
our employees in their work environment. We obey all labor laws and do not condone any type of child labor, forced labor,
slavery or human trafficking. We conduct our business in manner that respects human rights.

We focus on environmental responsibility and preventing waste. We recycle and purchase recyclable material when
feasible. We make sure all raw material supplied to us on or after January 31, 2013 is "DRC Conflict Free", as defined by the
applicable SEC rules. And all guidelines and requirements for RoHS and REACH Compliance are followed.

Goals for the future.

- We understand progress involves a balance of taking care of the environment, social responsibility and growing our community's. Sims Machining view our employees, suppliers, customers, and our community as our allies in building the future.
- New Crisis Management for Corvid-19 has been added to our handbook and our Quality Assurance Manual.

SIMS MACHINING SUSTAINABILITY WILL ALWAYS BE BASED ON OUR CODE OF CONDUCT AND OUR ETHICS!