

October 2023

Ethics and Anti-Corruption Policy

Business Ethics and Conduct

The successful business operations and reputation of LINDSEY are built upon the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of LINDSEY is dependent upon our customers' trust. We are dedicated to preserving that trust. Each of us owes a moral and ethical duty to the Company, to our customers, and to the public, to act in a way that will merit continued trust and confidence in LINDSEY.

LINDSEY will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit and intent of all relevant laws, and to refrain from any illegal, dishonest or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide us with respect to lines of acceptable conduct. If a situation arises in which it is difficult to determine the proper course of action, the matter should be discussed openly and, if necessary, with the President or CEO for advice and consultation.

Compliance with this policy of business ethics and conduct is the responsibility of every LINDSEY employee.

Anti-Corruption

All LINDSEY sales, marketing, purchasing, finance, and management personnel, along with all Lindsey sales representatives and distributors doing business outside of the USA are required to comply with all applicable U.S. laws, including the Foreign Corrupt Practices Act (FCPA), as well as all local laws of the country or countries in which actions pursuant their activities. These parties agree to complete periodic training in FCPA compliance. All international agents and representatives also represent and warrants that no money paid by Lindsey to them as a commission, compensation, expense reimbursement or otherwise has been or will be used to provide anything of value to a representative of a foreign government, a utility owned in whole or in part by a foreign government, or quasi-governmental agency, including but not limited to any bribe or kickback to procure or obtain business, in violation of U.S. or local law.

LINDSEY agents or distributors doing business outside of the USA agree to identify all personnel involved in representing Lindsey and must be approved by LINDSEY before they perform any actions on LINDSEY's behalf. A written record and accounting must be kept of all payments made by such agent or distributor to third parties in connection with the sale of Lindsey products, or out of funds provided by Lindsey, and parties agree to provide a copy of this accounting to LINDSEY upon request. In no event shall any payment be made to any undisclosed third party in connection with the sale of Lindsey products, or out of funds provided by LINDSEY.

