



## CODE OF BUSINESS CONDUCT

---

---

## Table of Contents

<b>FULFILLING OUR CODE .....</b>	<b>3</b>
<b>USING THIS CODE.....</b>	<b>5</b>
<b>CONFLICT OF INTEREST.....</b>	<b>8</b>
<b>GIFTS AND ENTERTAINMENT .....</b>	<b>10</b>
<b>PROTECTION OF ASSETS.....</b>	<b>12</b>
<b>POLICY OVERVIEW .....</b>	<b>12</b>
<b>INTEGRITY OF RECORDS AND ACCOUNTING PROCEDURES .....</b>	<b>14</b>
<b>INSIDER TRADING.....</b>	<b>16</b>
<b>FAIR BUSINESS COMPETITION .....</b>	<b>17</b>
<b>BRIBERY AND CORRUPTION .....</b>	<b>19</b>
<b>BOYCOTTS.....</b>	<b>21</b>
<b>TRADE RESTRICTIONS AND EXPORT CONTROLS .....</b>	<b>22</b>
<b>FAIR EMPLOYMENT PRACTICES/SAFE WORKPLACE.....</b>	<b>24</b>
<b>ALCOHOL AND SUBSTANCE ABUSE.....</b>	<b>26</b>
<b>HEALTH, SAFETY &amp; ENVIRONMENT.....</b>	<b>27</b>
<b>PROPER USE OF COMMUNICATION AND INFORMATION SYSTEMS.....</b>	<b>29</b>
<b>PUBLIC RELATIONS.....</b>	<b>30</b>

## Fulfilling Our Code

*“Each of us is responsible for acting ethically.”*

### **Lummus’ Responsibility**

Lummus is responsible for implementing the ethics and compliance program, creating and maintaining policies, updating and distributing this Code, and making other resources available to employees. We will provide information to help all employees understand and live up to the Code by offering:

- Clear policies and procedures.
- Training and education.
- Resources where employees can get advice, raise concerns, and make reports.
- Ethics Speak Up Line.
- Business Unit and Corporate Compliance resources.

All conversations, calls, and reports made in good faith will be taken seriously. Our Company will investigate all reported concerns – promptly and as confidentially as possible (anonymous reporting is allowed) – and resolve those concerns appropriately. If, after investigation, we find that the Code has been violated, we will take appropriate action, including disciplinary action, and make such changes necessary to prevent recurrences. Our actions may include notifying the appropriate governmental agency.

### **Leadership’s Responsibilities**

Managers and supervisors are expected to provide timely advice and guidance to employees on ethics and compliance concerns. Their leadership helps create a work environment that values mutual respect and open communication. The more we talk openly about ethics and compliance, the clearer everyone will be about what is expected. Managers and supervisors must take a leadership role in meeting the following additional responsibilities:

- Never ask an employee to do what you would be prohibited from or uncomfortable with doing yourself.
- Be a resource for employees. Communicate to employees about how the Code and policies apply to their daily work.
- Serve as a role model for the highest ethical standards and work to create and sustain a culture that demonstrates care and concern for your colleagues.
- Be proactive. Take reasonable actions to prevent and identify misconduct and report situations that might impact the ability of employees to act ethically on behalf of the Company.
- Take prompt action to correct business conduct that is inconsistent with the Code or policies.
- Seek assistance from other supervisors whenever you are unsure of the best response to any given situation.

---

## **Employee Responsibility**

- As an employee of Lummus, you must first and foremost take responsibility for your own ethical behavior.
- You have the responsibility to read, understand, and comply with this Code of Business Conduct and learn the details of the Company policies that specifically impact your work assignments.
- Always ensure that your actions are lawful and ethical; provide an example and leadership to others to maintain the highest ethical standards in conducting all Lummus business.
- Taking our compliance and ethics training is required to do your job. It is not a burden; it is a reminder of who we are and the standards we live up to.
- Cooperate in, and do not obstruct or interfere with, internal investigations about reported ethics or compliance matters. Lummus expects all employees to provide truthful and honest answers or responses during any investigation or inquiry conducted by the Company.
- Ask questions and seek advice before you act if you are uncertain about the right course of conduct.
- Reporting any concerns or suspected violations of our Code. All reports will be properly investigated.
- Never worry about retaliation should you make a report.
  - Regardless of the type of misconduct reported, or the method of reporting that is chosen, Lummus will not tolerate any retaliation or retribution against anyone who makes a good faith report of an alleged violation of the Code.
  - Individuals who raise concerns or who help to resolve reported matters are protected against retaliation. We take claims of retaliation seriously. All such claims will be thoroughly investigated and, if substantiated, retaliators will be disciplined up to and including termination.
  - However, anyone who uses the ethics and compliance program to spread falsehoods or threaten others, or with the intent to unjustly damage another person's reputation, will be subject to disciplinary action.

***“It is curious that physical courage should be so common in the world and moral courage so rare.”***

***-- Mark Twain***

***“It takes 20 years to build a reputation and five minutes to ruin it.”***

***-- Warren Buffet***

---

## USING THIS CODE

### What is the Code?

Our Code of Business Conduct (Code) is a document that sets forth Lummus Technology's Values and Principles. It sets forth our expectations of behavior for employees, managers, and contractors of Lummus Technology, its subsidiaries and affiliates (hereinafter known as "Lummus" or "Company"). Our Code is not detailed enough to cover every situation. Instead, it sets forth foundations that guide each of us on how to perform our everyday work with sound judgment based on our principles of ethical conduct, common sense and unwavering compliance with all applicable laws, regulations and contractual obligations.

Each of us should endeavor to deal with our fellow employees and with Lummus' customers, suppliers and competitors honestly, openly, and impartially, adhering to the philosophy that business should be won or lost based solely on the merit of the products and services being provided. We should not take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair business practice.

### Purpose and Applicability

The purpose of this Code is to:

- describe the standards of behavior and business conduct that govern each of Lummus' operating units in all of their worldwide locations,
- provide a summary of key Lummus' policies and principles that control and guide our business,
- provide guidance on how to resolve difficult questions about business conduct, and
- provide guidance on how to relate to other employees, our customers, shareholders, communities, vendors and competitors, and government.

Our Code applies to our officers, directors and all full-time, part-time, and temporary employees. In addition, we expect our suppliers, vendors, contractors, agents, representatives, consultants and joint venture partners to behave in the ethical manner described in our Code when doing work for Lummus.

### Structure of our Code

Our Code of Business Conduct consists of fourteen elements presented in an easy-to-follow format:

- Policy overview.
- Key requirements.
- Tips.

### What is expected of me?

As a Lummus employee, you are required to:

- Adhere to this philosophy, and to always conduct yourself and your business dealings honestly and in accordance with the highest level of ethical standards.

- Be familiar with the provisions of this document and adhere to the spirit and language of the Code.
- Promptly report any suspected violations of the Code.
- Cooperate with any investigations into potential misconduct.
- If you are uncertain about how to do the right thing, seek guidance from your supervisor and the other Lummus resources listed below.

### Help when you need it.

This Code will not give you an answer for every ethical dilemma nor describe all unethical business practices in detail. If you have any doubt about the right thing to do, you have several places where you may turn for advice and guidance:

- Your supervisor or manager.
- Your Human Resources representative.
- A member of the Legal Department\*
- Call the Ethics Speak Up Line at:

<u>Country</u>	<u>Phone Numbers</u>
United States	(855) 901-8894
Australia	1-800-551-155 (Optus) 1-800-881-011 (Telstra)
China	400 120 4156
Germany	0800 8004238
India	000 800 0502 094
Korea, Republic of South	00-309-11 (Dacom) 00-369-11 (ONSE) 00-729-11 (Korea Telecom) 550-2872 (U.S. Military Bases - Dacom) 550-4663 (U.S. Military Bases - Korea Telecom)
Netherlands	0800-022-9111
Russia	8 800 100 64 69
Saudi Arabia	8008500701
Singapore	800-001-0001 (StarHub) 800-011-1111 (SingTel)
Thailand	1-800-0001-33
United Arab Emirates	8000-021 8000-061 (Military-USO and cellular) 8000-555-66 (du)
United Kingdom & Northern Ireland	0800 069 8156

- Ethics web reporting at [www.LummusTechnology.ethicspoint.com](http://www.LummusTechnology.ethicspoint.com) \*

\*Anonymous or confidential reporting available

## Considerations to make good decisions

When unsure whether an action complies with the Code of Business Conduct, ask yourself the following questions:

- Do I have all the facts and have I reviewed them carefully?
- Have I identified and considered all of my options?
- What are the consequences of my decision?
- Is there any applicable Lummus policy or legal requirement that must be complied with?
- Is it the right thing to do, would I be proud of the choice I made?
- How will my decision be viewed in one month; one year; later?
- If it became known, might my action result in embarrassment either within or outside Lummus, i.e. the newspaper front-page test? the internet message board test?

***Seek guidance if you are still unsure what to do.***

***Don't hesitate to ask questions and get the advice and guidance you need.***

***Keep asking questions until you are certain you are doing the appropriate thing.***

## Conflict of Interest

### Policy Overview

Lummus requires you to make reasoned and impartial decisions in the workplace. Conflicts of interest can affect your decision-making and may adversely affect Lummus.

You have a conflict of interest when your personal interests interfere with or appear to interfere with the ability to act in the best interests of Lummus. Conflicts can arise not only when you personally benefit or gain, but also when other persons (including family members) or organizations with which you have ties stand to gain.

In general, if a potential conflict of interest exists, you must excuse yourself from making any decisions about the issue at hand, disclose the relevant facts in writing, and explain the possible conflict to your immediate supervisor, or to Human Resources, Legal or Compliance personnel. In addition, obtain required approvals before making any such decisions or taking any actions that may appear to be a conflict of interest.

### Key Requirements

Avoid all activities that conflict or appear to conflict with those of Lummus and disclose such interests/situations that exist. Some common examples are:

- **Outside Employment and Interests.** Regular full-time employees shall not hold jobs with other employers or engage in outside business or other interests (including self-employment) that adversely impacts their performance or Lummus' interests.
- **Direct or Indirect Financial or Other Participation in Business.** If you, or any of your immediate family members, have any direct or indirect financial or other participation in any business which competes with, is a supplier of goods or services to, or is a customer of Lummus, you must disclose such to Lummus and receive written management approval before any business is transacted with such business.
- **Customer and Supplier Relations.** Any relationship between you and a customer or supplier must in no way compromise your ability to transact business on a professional, impartial and competitive basis or influence business decisions made for Lummus.
- **Corporate Property and Information.** Employees are prohibited from taking personal advantage or gain from opportunities that are discovered using Lummus property, information or position.
- **Contributions.** If you are involved in decisions to donate Lummus assets, including money, goods-in-kind or services, you must disclose any personal benefit that you or your family members may receive as a result. Generally, all donations of Lummus assets must be approved in advance even where Lummus may receive benefits of increased goodwill with our various stakeholders.

### Examples

Conflicts of Interest tend to be fact specific. While it is impossible to list every possible conflict of interest, the following will serve as a guide to the types of activities that might cause conflicts and should be reported to Lummus:

- You or a close relative own (other than by ownership of publicly traded stock) a significant financial interest in any outside company that does business with or is a competitor of ours;
- You serve as a director, manager or consultant to any outside company that does business with or is a competitor of Lummus, without Lummus' knowledge and consent;
- You use substantial working time or company facilities for transacting business that does not advance the interest of Lummus. This excludes company-approved voluntary services related to professional, scientific, educational or charitable institutions, and other business matters approved by Lummus from time to time;
- You represent the company in any transaction in which you or a close relative has a significant interest;
- You disclose or use confidential Lummus information or information that has been provided to Lummus in confidence, for the personal profit or advantage of yourself or anyone else; or
- You engage in direct or indirect competition with the company.

### **Tips**

- Refer to Lummus Policies on Conflict of Interest and the Gifts and Entertainment Standards to ensure full compliance.
- Avoid any situation, activity or investment that affects or appears to affect your ability to exercise impartial judgment on the job or adversely affects Lummus' interests.
- Do not use Lummus information that is not available to the public either for personal profit or in a way that adversely affects Lummus is strictly prohibited.
- Conducting business for personal gain using Lummus property, information or position is strictly prohibited.
- Do not personally profit through other parties or entities dealings with Lummus.
- Exercise caution and good judgment in the giving and receiving of gifts and entertainment.
- Ensure all contributions in Lummus' name have been properly approved.
- Report any situation that could indicate a potential conflict of interest in the workplace.

---

## Gifts and Entertainment

### Policy Overview

To build goodwill with potential and existing clients and other business partners, exchanging gifts and entertainment as business courtesies is accepted business practice. However, we must be cautious when exchanging business courtesies to avoid a conflict of interest or the appearance of one.

You must not give or receive gifts of any value under circumstances that are unlawful or might otherwise appear to be an attempt to improperly influence a decision that affects the Company. In the context of a business relationship the giving or receiving of gifts or entertainment is acceptable within the limits and conditions defined in the Company's Gifts and Entertainment Standards.

You may offer or receive gifts and entertainment commonly accepted as business courtesies, provided they are of nominal value and will not inspire favoritism or a sense of obligation to provide something in return.

Meals and entertainment must be reasonable, must be for a business purpose, and must not be so frequent that they suggest a pattern.

If you receive a gift exceeding the parameters set within the Company standards, you are required to seek approval or, if necessary, you should return it with a note explaining the Company standards.

Finally, because there are special rules and restrictions regarding government officials, we cannot overstate the need for you to consult with a member of the Legal Department when you have any doubt about matters of gifts and entertainment.

### Key Requirements

- **Broadly Construed.** For purposes of our Code of Business Conduct, "gifts and entertainment" have the broadest possible meaning, including gifts, trips, services, entertainment and any other gratuitous item, event, benefit or thing of value.
- **No Obligation or Expectation.** In dealings with customers, suppliers or competitors, you must not give or accept anything of value in what appears to be an exchange arrangement. That is, there cannot be, and there must be no appears that there is any obligation or expectation for you (if you are the recipient) or the client (if they are the recipient) to provide any item or action in return for the gift of entertainment. Such actions could be considered bribes or kickbacks under U.S. state and federal laws, and may be in violation of other laws when U.S. or non-U.S. government contracts are involved. Non-U.S. Government Officials.
- **Moderation in All Things.** Meals, gifts and entertainment must be for business purposes, must not occur on a repetitive basis, must be reasonable in cost and appropriate to the occasion and participants and must be pre-approved per Company standards (Gifts and Entertainment) and guidelines (business meals).
- **Cash is Not Acceptable.** Cash, nor anything like cash (e.g., Gift Card, Gift Certificate, Pre-paid Debit Card, Phone Card or Loan), may be given nor received as a gift.
- **Government Officials.** Consult with a member of the Legal Department for guidance on meals, gifts and entertainment. Specific approvals are required. Remember that employees of state owned enterprises are considered government officials.

### Examples

- Accepting a gift from the company or someone with whom we do or plan to do business, and the gift is of more than token value, loans (other than from established banking or financial institutions) or excessive entertainment is not acceptable and is a conflict of interest.
- Requests for travel or entertainment not reasonably related to the business at hand (such as a fully paid trip to Disney World for a client who is visiting our Houston offices) is not acceptable.
- Sporting and entertainment events generally are acceptable provided the pricing is within the corporate guidelines and both the recipient and giver are present at the event.
- Providing transportation to the client's hotel and for excursions to local site-seeing or shopping is acceptable and needs no additional approval provided the per person costs fall within the gifts and entertainment policy guidelines.
- Corporate logo merchandise is appropriate.
- Entertainment of questionable taste (e.g., "Gentlemen's clubs", gambling, "adult" oriented activities) is not acceptable.
- Extravagant, lavish or excessive activities (e.g., front row at the last Rolling Stones' tour, tickets to the Wimbledon finals, etc.) are not permitted without proper corporate review and approval.

### Tips

- Don't offer, give or receive anything of value under circumstances that could be viewed as an attempt to improperly influence a recipient's decisions affecting Lummus.
- Lummus' standards make no distinction between clients and their family members where gifts and gratuities are concerned.
- Never give nor accept cash, stocks, bonds, or gift certificates in any amount from persons with whom Lummus does business or may do business, and never give cash or cash equivalents to such persons.
- Never make or offer gifts or entertainment if acceptance would violate the standards of the recipient's organization.
- In determining the value of gifts and entertainment, you must consider associated costs as well as direct cost.
- Avoid accepting or giving anything that, if publicly disclosed, would embarrass Lummus.
- Accurately document and report all entertainment and gifts you give.

---

## Protection of Assets

### POLICY OVERVIEW

Lummus' assets – both physical and intellectual – are highly valuable and are intended for use only to advance Lummus' business purposes and goals. These assets must be secured and protected in order to preserve their value.

Each of us is entrusted with Lummus' assets and resources in order to do our jobs. We are personally responsible for safeguarding these assets and resources and using them responsibly in our jobs, without waste, loss, damage, theft or misappropriation.

Second only to our People, Lummus' Intellectual Property (Patents, Proprietary Information, Copyrights and Trademarks) are Lummus' greatest asset. Proprietary Information is information or knowledge that is not generally available to the public concerning Lummus' technology, operations or personnel that we have decided must not be disclosed to others, except as required by law or under circumstances permitted by Company policy.

As an employee, you must protect Lummus' proprietary information and must not seek to obtain or disclose the proprietary information of others. Disclosure of proprietary information could put the Company at a competitive disadvantage or could hurt Lummus, its employees and customers, the Company, or ventures in which it participates.

Development of new Intellectual Property is Lummus' lifeblood. Not only must we protect Lummus Intellectual Property, but we must also constantly strive to improve our technologies and be innovative in our daily work. It is not only important in making new strides in our technology, but also protecting those innovations at every turn.

We also respect the proprietary information of third parties. We do not engage in unethical or illegal means to obtain confidential information or proprietary data belonging to others. Lummus does not permit the use of proprietary information that you learned in your prior employment. Without the approval of management, Lummus does not want to accept the proprietary information of third parties. Inadvertently accepting the proprietary information of third parties could irreparably damage Lummus research and development activities.

### Key Requirements

**Use of Company Assets.** In general, Lummus' assets are only to be used for Lummus' benefit. Care should be taken to ensure that Lummus' assets are not wasted and used inefficiently. Lummus does not allow the personal use of its communication and information systems provided that the use does not represent a conflict of interest, does not include pornographic or defamatory material, is not excessive and does not interfere with work priorities. As employees, we should have no expectation of privacy when using these company services.

**Disclose company information only as permitted by Lummus Policy.** Disclosing Lummus' proprietary information is prohibited except as required by law or under specific circumstances permitted by Company policy. Not only must you avoid disclosure of Lummus' proprietary information as a result of your statements or acts, but you must also take all necessary steps to prevent others from illegally obtaining Company proprietary information.

**Respect Third Party Assets.** Lummus respects the physical and intellectual assets of others. Lummus does not permit the use of the proprietary information of your prior employers without their specific permission. You should not seek to improperly know the proprietary information of other companies, and must inform your local legal counsel if you learn or hear of such information. Similarly, immediately report any attempt to improperly obtain Lummus proprietary information.

Lummus does not knowingly infringe valid patents, trademarks, or copyrights of others; misappropriate confidential information in violation of the rights of others; or use or disclose confidential information of others without proper authority.

**Employee NDAs are mandatory.** All employees must sign a confidentiality agreement that also includes the assignment of rights of any inventions related to their jobs. Individuals in critical jobs must conform to additional security safeguards as determined by the business unit.

### **Tips**

- Never share Lummus' proprietary information with customers or suppliers except as permitted by company policy.
- Don't divulge confidential Company information to anyone outside the Company or to persons within the Company who do not have a "need to know."
- Never discuss confidential information loudly or openly when others might be able to hear.
- Avoid the unauthorized receipt of proprietary information from others. Should you receive unauthorized proprietary information, advise a member of Lummus' Legal Department immediately.
- Do not disclose to Company personnel or use for the Company's business any confidential information in your possession as a result of prior employment with another company.
- Report any instance of corporate spying, hacking, or other illegal activity, whether for or against the Company.
- If you are responsible for Company proprietary information, it is your duty to take appropriate precautions to ensure the security of such information.
- Notify our patent attorneys of any inventions made related to your employment by the Company.
- Promptly send to our patent attorneys any unsolicited information on ideas and inventions received from anyone seeking the Company's interest in developing such ideas or inventions.
- Respect the copyrights of others – do not use software not approved for use, do not copy articles off the internet to widely distribute to colleagues.

---

## Integrity of Records and Accounting Procedures

### Policy Overview

We create documents and records in the normal course of business to assist in our decision-making process and to document our compliance with laws, regulations and Lummus' policies and procedures. All entries in the Company's books, records and accounts must be complete, accurate and fairly reflect our business transactions conforming to applicable accounting standards and legal requirements.

Whatever your part in this process, you are required to be honest and forthcoming – if a transaction or payment cannot be accurately documented without raising legal questions or embarrassing Lummus, the transaction should not be consummated and the payment should not be made.

All of Lummus' records, from your expense account forms to Lummus' annual report must accurately reflect the facts. Corporate funds and assets must be recorded according to Lummus' procedures. False or misleading entries are unlawful and will not be tolerated. No one may establish undisclosed or unrecorded funds or assets for any purpose. Except for normal and customary petty cash funds, which are strictly controlled, cash transactions are not allowed.

Essential information used for reporting, auditing, and other critical purposes must be retained in a recoverable format and it must be managed securely.

It is essential that you adhere to both the spirit and the letter of the law in these matters.

### Key Requirements

**Accuracy and Honesty.** All Company records and documents must be accurately and honestly created and maintained, and all accounts and reports must fully reflect all relevant facts. This is Lummus' policy and it is the law. In following these requirements, activities such as embezzlement, money laundering and holding "off the books" cash or slush funds are prohibited.

**You are the Responsible Party.** Each employee must safeguard records and documents entrusted to him or her and maintain all records and documents with the appropriate level of privacy. Further, each employee must immediately report any suspicion they have that these policies are not being properly fulfilled throughout the organization.

**Violations have Serious Ramifications.** Violations of Lummus' policy in these matters can cause serious legal and financial problems for Lummus. If you are found to have violated any of these requirements, or have instigated or ignored violations by others, you can be subject to criminal prosecution and Lummus' disciplinary action up to and including termination of employment.

### Tips

- False or misleading entries of any kind on Company records or accounts at any level is strictly prohibited.
- Don't create or use hidden cash or bank accounts for any purpose.
- If you are asked by any outside person, group, or agency to provide access to records or documents maintained by Lummus, you must first discuss the request with a member of the Legal Department or our Finance Department.
- Remember that information recorded electronically or via e-mail is a Company record – just like information on paper.

- Don't make improper or questionable payments to customers or suppliers.
- Don't make substantial cash payments for any Company business.
- Report violations of accounting or reporting procedures to an appropriate authority.
- If you approve reports and/or accounting documents created by others, read them carefully and satisfy yourself that they are complete and accurate before signing off on them.
- If you become aware of litigation, investigations or audits, suspend all record destruction.
- If you change jobs or leave Lummus, be sure to transfer custody of all relevant books and records.
- If you have any questions about records, accounting or reporting, consult with your local Controller or the Legal Department.

***No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records. It is never acceptable to create false or misleading records or otherwise conceal the truth from Lummus' management, auditors, or regulators.***

---

## Insider Trading

### Policy Overview

Insider trading is prohibited. Even though Lummus is not a publicly traded company, you still could have the opportunity to violate insider trading laws.

As we deal with suppliers and clients, we will have insider information concerning their workings. Just as you cannot trade Lummus stock (if we were public) when you have inside information, you cannot trade the stock of our suppliers or clients when you have inside information.

"Inside information" is material information that is not available to the public that a reasonable investor would likely consider important in making a decision to buy or sell a security. Remember that even information about events or actions that are not certain to happen, such as the possible new award or signing of a joint venture award, can be considered inside information.

Remember, our policy not only prohibits insider trading by employees, but also forbids the communication of material non-public information to anyone (including spouses and other family members) for anything except legitimate business purposes.

### Key Requirements

**Do not Trade on Non-Public Information.** Any trading in securities while in possession of material non-public information is a violation of Lummus' policy. You will be held accountable not only for personally trading on such information, but also if it can be shown that you disclosed material information to others who traded on such information, or that you could have prevented impending violations by others in Lummus but failed to take action.

**It's not just you.** Don't provide non-public information that you have received as part of your job to third parties, including your spouse and other family members.

### Tips

- Don't buy or sell securities of a company if you have received material non-public information concerning that company as part of your work for Lummus.
- Do recognize that you may possess material non-public information about a company, even if you have not been notified of any trading restrictions, and that your communications and investment decisions should always conform to applicable laws and Company policy.
- Don't post non-public information you have received about a company due to your work for Lummus on Internet message boards or social networking sites.
- If you have any question regarding what constitutes insider trading or the Company's policy on insider trading, consult with a member of Lummus' Legal Department.

## Fair Business Competition

### Policy Overview

Lummus is subject to various competition laws, also known as antitrust laws, in the countries where we do business. These laws are designed to uphold the free market system and ensure that businesses compete to provide quality services at fair prices.

The Company prohibits not only actual violation of fair competition laws or other antitrust behavior, but also any act that gives the appearance of wrongdoing. When you have any doubt about dealings with competitors, suppliers, or customers, you must consult with a member of Lummus' Legal Department.

Fair competition laws generally prohibit mutual understandings to control prices, dividing territories, boycotting certain suppliers or customers, allocating products, territories or markets amongst competitors and other similar activities with competitors that negatively impact the market.

Violations of antitrust law may also involve non-competitive practices between the Company and its customers.

Lummus has many joint marketing and development agreements with companies with which we otherwise compete. You must be careful not to use or discuss any pricing, cost or strategic information given or received outside the working at and management of the joint marketing or development relationships. Such discussions could be deemed or lead to anticompetitive practices.

Dealings with representatives of other companies must be undertaken with extreme care. All employees should carefully review the Company's Antitrust Compliance Policy, but if you are in marketing, sales, purchasing and related positions, you are especially urged to do so because your activities will often bring you into contact with competitors.

If you are found to be in violation of fair competition laws, you will be subject to disciplinary action up to and including dismissal unless you have previously made a full disclosure of the facts to the Chief Legal Officer and subsequently acted on their advice.

### Key Requirements

The following activities are strictly prohibited:

**Price Fixing.** Agreements or understandings between competitors to raise, lower, maintain, stabilize, or otherwise fix prices is "price fixing" and is prohibited. Competitors may not agree on the prices they will charge for their products. Never discuss our pricing practices or components of pricing with a competitor, nor discuss their practices either.

If the competitor is a customer and the discussion is in conjunction with a specific sales transaction in the normal course of business, then you may discuss the price being offered; however, you need to check with your local Legal representative prior to such a discussion. You may not provide the basis on which prices are established. This prohibition includes such items as man-hours for a job, rates for man-hours, wages, or benefits for employees.

**Bid Rigging.** Bid rigging is agreements or understandings between competitors concerning proposals to their clients, such as

- Agreeing upon prices or other terms and conditions,
- Agreeing to rotate or alternate submission of bids, or

- Agreeing that one competitor will bid for certain contracts or customers while other competitors will bid for different contracts or customers.

**Market Division.** Market division is an agreements or understandings by which competitors divide the market in which they compete, such as by allocating customers, territories, or products among themselves.

Because competition law is complex, if you have questions about these laws and how they apply to specific business transactions, contact a member of the Legal Department.

### Tips

- Antitrust is a very complex area. Always ask for advice from the Legal Department before you act.
- Never make agreements or understandings with competitors regarding pricing, or allocation of customers, geographical areas, or types of work.
- Make purchases strictly on the basis of quality, price, and service.
- Do not communicate with competitors about sales; actual or potential customers; bids, products and services provided to customers; capabilities; or plans.
- Before attending trade and professional associations, clearly review and understand the rules for attending and participating in discussions of programs.
- If you are in a situation where others discuss topics that raise antitrust concerns, you must explain that we do not engage in such conversations. If the discussion continues, you must leave the room and immediately contact the Legal Department.
- All meetings and discussions regarding understandings or agreements with competitors must be discussed in advance with a member of the Legal Department or the Chief Legal Officer.
- In our internal and external business discussions, be mindful of the following rules:
  - Be careful of the exaggerated use of power words such as, “This program will destroy competition.”
  - Do not describe competition as something unexpected or improper, such as referring to price-cutting by a competitor as “unethical” or a lost bid as one “stolen” by a competitor.
  - Always be clear that Lummus competes against its competitors vigorously, and that our prices are solely based on our own business judgment.
  - When discussing the prices or plans of competitors, clearly identify the source of your information so there will be no implication that the information was obtained under a collusive arrangement with a competitor.

## Bribery and Corruption

### Policy Overview

Lummus has zero tolerance for bribery and corruption.

In many parts of the world, paying bribes to win business contracts is unfortunately both accepted and expected. However, Lummus will not tolerate bribery of any form-with any third party, public or private, whether done directly or indirectly through third parties, even if we lose business or encounter delays because of our refusal to do so.

A "bribe" is an offer or promise to give, or the giving of, or authorizing someone acting on your behalf to give, anything of value or another advantage to improperly influence the actions of a third party, public or private. Bribes may include money, gifts, travel or other expenses, hospitality, below-market loans, discounts, favors, business or employment opportunities, political or charitable contributions, or any direct or indirect benefit or consideration. Improper influence typically involves the intent to secure a quid pro quo to buy the misuse of someone's position.

Bribes violate anti-corruption laws such as the U.S. Foreign Corrupt Practices Act (FCPA) or the U.K.'s Anti-Bribery Act. It is your duty to know and follow the local and other applicable anti-corruption laws that apply to your assigned duties. Consequences for violating anti-corruption laws are severe for both our company and the individuals involved, including possible civil and criminal liability.

While the FCPA does not prohibit "facilitating" or "expediting" payments the U.K. Anti-Bribery Act does. A "facilitating payment" is a small payment given to a government employee, usually in cash, to expedite or secure the performance of a routine process such as to expedite utility services, provide needed police protection or approve the granting of a work permit or visa.

At Lummus, facilitating payments are prohibited, unless they are:

- Pre-approved in writing by the Legal Department;
- Allowed under all applicable anticorruption and local laws; and
- Properly and accurately accounted for in our company's records

Lummus may be liable under anti-corruption laws not only for the actions of our employees, but also those of our business partners. If you have a reasonable suspicion that a business partner or other third party might pay a bribe, but fail to take the appropriate steps to attempt to prevent such payment, we may be seen as implicitly authorizing the bribe.

Very rarely will Lummus permit the use of third-party agents. One permitted example is if it is necessary or required to use agents, consultants, representatives or other third parties to arrange or broker deals with governments, government entities and private entities or to engage in business in those countries.

We expect our joint marketing and development partners, suppliers, contractors, consultants, agents and other business partners to maintain a zero tolerance for bribery.

### Key Requirements

**Bribery is just not tolerated. Period.**

**Use extreme care when dealing with a "public official".** The definition of a "public official" is very broad under the anti-bribery laws. It is not only someone elected to public officer, or running for public office. It includes anyone who receives their paycheck from the government, or an instrumentality of the government or anyone who works for a public international organization. Police officers, regulators, career civil servants, and most importantly, all employees of state owned or partially controlled enterprises (oil companies) are considered "public officials".

Make no payments of any kind or offers to pay or give anything of value to any foreign public official, or any representative of such persons, with the intent of gaining an improper advantage. Similarly, no such payments or offers are to be made through our agents, consultants, joint marketing or development partners or other affiliates doing business abroad.

**Maintain Perfect Records.** Anticorruption laws also require that we maintain a system of internal accounting controls, and that our books and records accurately reflect all transactions. No one may make false or misleading entries in Company records for any reason. You must provide adequate documentation for all Company payments with which you are concerned, and should neither make nor accept payments intended to be used in any part for reasons other than those described in supporting documents.

**Violations or Suspicious Activity must be Reported Immediately.** Because Lummus can be accused of corruption or bribery for not reporting the acts of its partner, suppliers or clients, the moment you have a reasonable suspicion that bribery or corruption is taking place, report it immediately to your supervisor and a member of the Legal Department.

**The Consequences are Severe.** Not only does not following Lummus' anti-bribery rules put Lummus in great danger, it is dangerous for the employees as well. Any person who engages in bribery or kickbacks or other illegal behavior will be terminated and may be subject to criminal penalties.

### **Tips**

- Written approval of the Head of Compliance or Chief Legal Officer must be obtained prior to making any facilitating payment unless there is an immediate and credible threat to an employee's physical safety or security and it is not reasonable to obtain such approval.
- Report any violation you observe or hear about.
- Don't give gifts or entertainment to foreign public officials without prior approval of the Head of Compliance or Chief Legal Officer.
- Keep accurate accounting records.
- Be careful not to give permission to a third party (agent, supplier, client or partner) to do what we are not allowed to do. Report immediately if a third party has acted in Lummus' name and did something.

---

## Boycotts

### Policy Overview

A boycott is an organized effort to coerce its “target” to take a specific action. Boycotts are “enforced” by refusing to buy, sell or use the target’s products and/or services. The anti-boycott provisions of U.S. law were adopted to require U.S. firms to refuse to participate in foreign boycotts that the United States does not sanction.

These laws have the effect of preventing U.S. firms from being used to implement foreign policies of other nations that run counter to U.S. policy.

Lummus is also required to promptly report to the U.S. Government any and all requests to join in, support, or furnish information concerning a non-U.S. boycott. This includes language in an invitation to bid or presented in a contract. As an employee, you must report such matters to the Legal Department in order for the Company to fulfill its obligation to report boycott request activity to the government.

### Key Requirements

**Be Very Aware.** United States laws prohibit anyone acting on behalf of the Company from participating in boycotts against countries friendly to the United States. Sometimes boycott language is “hidden” to make it harder to find. For example, a contract requiring that we only use “approved shipping lines”, or requiring Lummus to report the “complete shipping routes” for any products we deliver. Contracts that require us to always follow “all local laws” even when we do not have people in country can also violate anti-boycott laws. If you have any concerns, contact the Legal Department.

**Don’t give out personal information.** We must not provide information of any kind that will violate U.S. anti-boycott laws and regulations, such as the nationality or religion of our employees or consultants. If you receive an oral or written request, you must report the situation immediately to the Legal Department. Do not take any action on such a request until you receive advice from the Legal Department.

**It’s not just Illegal, it’s Expensive.** United States laws also provide for denial of tax credits for participation in unsanctioned boycotts. With few exceptions, we are required to report to the U.S. government boycott requests as well as requests for boycott-related information. While these laws were passed primarily to address the Arab boycott of Israel, they apply to boycotts of any country friendly to the United States.

Because the Company can be subject to civil and criminal penalties and administrative sanctions for violating anti-boycott regulations, compliance with the Company’s Anti-Boycott Procedure is mandatory.

### Tips

- You must examine purchase orders, contracts, letters of credit, invitations to bid, and other types of requests for information to ensure that they do not contain any boycott-related request.
- Promptly report any request for information concerning a foreign boycott – and any other information you may learn about such a boycott – to the Legal Department.
- Parts of the Company that do business in the Middle East area must be especially attentive to boycott concerns and must process all documents and requests in strict accordance with the Anti-Boycott Procedure.
- When there is any question about boycott issues, submit all bids, contractual documents and proposed commitments to the Legal Department for review and decision.

---

## Trade Restrictions and Export Controls

### Policy Overview

As a global company, Lummus delivers its products and services all over the world. An "export" occurs when a product, service, technology or piece of information is shipped to a person in another country. An export can also occur when technology is provided in any way, including verbally, to someone who is not a U.S. citizen whether or not they are located in the United States or a third country.

Before engaging in exporting activity, all required licenses and permits must be obtained. The handling and the "re-export" (movement to a different country) of such equipment and technology, subsequent to obtaining a license, must be consistent with the terms of the license and all applicable regulations.

In addition, the United States has adopted a variety of trade restrictions and export controls to protect our national security and to promote foreign policy. The Company and its subsidiaries are subject to these laws, and support them wholeheartedly. Included in U.S. restrictions are prohibitions against dealing with specifically identified countries or persons or entities acting on their behalf, as well as transactions involving certain named narcotics traffickers and terrorists. The United States maintains lists of these countries, persons and entities that you must consult – in sum, you must know your agents, partners and customers.

As a global company, each of our employees must understand and follow the relevant laws, regulations and related company policies and practices. As an employee, you must be aware of these restrictions and controls, honor them, and consult with appropriate members of the Legal or Procurement Departments if you have any questions.

Consequences for violating trade control laws and regulations are severe for the company and the individuals involved, including the potential loss of export privileges and civil and criminal penalties.

### Key Requirements

**Check Before you Send Information.** Lummus must abide by all trade restrictions and export control laws affecting the Company and its products and services. Before sending any information to any foreign company, make sure that a proper compliance check has been performed on that company. You are expected to obtain advice from the Legal Department or Procurement Department before you make any commitments concerning export or re-export of goods, services, technology or software.

**Know to Whom you're Talking.** An oral discussion with any foreign person – even someone inside the United States – that discloses technical information is considered an export. While discussions with personnel of a U.S. based or E.U. based company are probably fine, when in doubt of the country of origin of your listener, you may want to consider carefully the technical information you disclose.

**Determine the End User.** You must take reasonable measures to ascertain the "end-user" identity, the location and intended use for products that are exported. We must ensure that none of our products or technology reach Specially Designated Nationals, Restricted Parties or Restricted Nations. Do not agree to send anything until you know we are not sending it through an intermediary to countries restricted by the United States or to designated persons acting on behalf of those countries.

### Tips

- Before engaging in any export/import transaction, be sure that:
  - The other party to transaction is not prohibited by the U.S. Government,
  - You have applied for and received all regulatory approvals, and

- you have secured all needed licenses.
- Remember that displaying any technical data at either foreign or domestic trade shows may require export authorization.
- If you are regularly involved in export or import, be thoroughly familiar with government prohibitions and source-specific information regarding them.
- You must not do anything, directly or indirectly that would facilitate business with any country subject to an embargo by the United States or by the host country.
- If you have any question as to whether an item, technology or potential recipient is restricted, consult with the Legal or Procurement Departments.

---

## Fair Employment Practices/Safe Workplace

### Policy Overview

Lummus' policies require that every employee be treated with dignity, respect and fairness, free from all forms of discrimination regardless of location. All employment decisions - such as hiring, promotion, pay, termination, training opportunities and job assignments - must be based on merit, not a person's legally protected characteristics such as gender, race, color, religion, national origin, marital status, age, disability, pregnancy, veteran status, sexual orientation, gender identity and other characteristics protected by law or Lummus Policy.

Lummus is committed to ensuring that all individuals in the work environment are treated with respect and dignity. Diversity and inclusion are embedded Lummus' values. Our workforce comprises skilled professionals from around the world who are dedicated to achieving excellence.

To this end, you are expected to demonstrate dignity and respect for all Lummus employees by valuing the diverse backgrounds, experiences and ideas present among your colleagues and in the locations where our company operates. You are responsible to promote an inclusive work environment by ensuring appropriate and fair behavior towards all Lummus employees, clients and individuals in our communities.

Our employees should work in a safe and professional atmosphere. Harassment has no place at Lummus and will not be tolerated. Harassment can take many forms, including verbal remarks, physical advances or visual displays. It may come from co-workers, supervisors, suppliers, contractors or clients. While the legal definition of harassment may vary by location, the behavior always has the purpose or effect of creating an intimidating, offensive or demeaning environment.

Harassment may be sexual or nonsexual in nature. Sexual harassment may include unwanted advances, inappropriate sexual jokes, sexually suggestive comments, touching, requests for sexual favors and inappropriate comments about appearance. Other examples of harassment may include offensive comments, jokes or pictures related to race, religion, ethnicity, gender or age. Harassment also includes verbal or physical conduct that denigrates or shows hostility toward an individual and can reasonably be perceived as threatening, offensive and/or insulting.

Lummus will not tolerate harassment, retaliation nor unlawful discrimination of any kind. All employees are expected to share the Company's commitment by ensuring that their relationships with others in the work environment are always conducted in highest professional manner.

Human Resources is responsible for ensuring that these policies are implemented throughout Lummus, but you and other employees will often be the means by which it is effected. If you have fair employment practices questions, consult with a member of the Human Resources Department.

### Key Requirements

**It's What you Do, not Who you are.** Lummus offers equal employment opportunity to all qualified individuals, strictly conforming to all laws governing the terms and conditions of employment wherever we have operations. Lummus follows all applicable labor and employment laws wherever we operate around the world.

Employment decisions shall be made on merit and in conformance with our principles of non-discrimination and equal opportunity. Compensation, benefits, transfers, layoffs, training, promotion, etc., shall be determined without regard to race, religion, age, color, sex, national origin, handicap, sexual orientation or gender identity.

**Treat Everyone with Respect.** Treat your fellow employees as you would want to be treated. Our diversity makes us strong. Value others' knowledge and experience – diversity allows us to view a

problem from many different facets and obtains solutions that might not seem obvious to only one culture or set of experiences.

**Promote a Safe and Professional Workplace.** Lummus expects each of its employees to be the model of professionalism in the workplace. Harassment and discrimination in all circumstances are inappropriate and unacceptable. Submission to such behavior is unnecessary and never a term or condition of employment for any person in our Company. Lummus is committed to providing a harassment- and discrimination-free workplace and to resolving any situation where individuals report that harassment or discrimination may have occurred. You should not keep silent and endure or observe behavior that you feel is inappropriate.

**Speak Up!** It is not enough that you are respectful of others. It is each of our duty to ensure that each employee has a harassment free workplace. Speak up if you see inappropriate conduct. Each of us must make Lummus a welcoming place for all of us.

### **Tips**

- When hiring an employee, choose individuals based on their qualifications to perform the job.
- Judge your employees on their performance; avoid introducing unrelated considerations into your decisions. Use objective, quantifiable standards for evaluating their performance. Constantly review your own decisions to ensure that merit and business considerations drive your actions, rather than subtle bias.
- It is every employee's responsibility to ensure a safe and professional workplace.
- Do not do or say things that may be considered offensive, unwelcome, or insulting. Even if you believe your acts or words are innocent, if someone says you are offending them and asks you to stop, do so at once. Be mindful that "harassment is in the eyes of the recipient."
- Use good judgment and avoid making jokes or comments, or using nicknames if there could be a question about their appropriateness.
- Where unsure of the appropriate course of action, check with a member of the Human Resources Department for assistance. Show respect and courtesy to all employees, customers, vendors, contract workers, and visitors.

---

## Alcohol and Substance Abuse

### Policy Overview

Lummus' goal is a workplace free from substance abuse of any kind. You are expected to be fit for duty and capable of performing your assigned responsibilities in a safe and productive manner.

Because we value a safe workplace for all employees, you are not permitted to work under the influence of substances that may affect the way you work. The illegal or unauthorized use, possession, presence in the body, manufacture, distribution, dispensation, transfer, storage, concealment, transportation or sale of any drug (including designer/synthetic drugs) or alcohol at your workplace, or while you are at work, is prohibited. You may never work under the influence of alcohol, illegal drugs, or prescription drugs that might interfere with your ability to do your job safely and effectively.

Where permitted by law, to assure compliance, the Company reserves the right to test for the use of alcohol or other controlled substances, and may conduct searches in the workplace if there is reason to suspect violation of policy.

### Key Requirements

**Adherence is Key.** You must abide by Company policies and local restrictions on the use of alcohol and controlled substances or face disciplinary action including termination. Where Company and local requirements differ, the stricter rule applies.

**A Successful and Safe Work Environment Depends on You.** Because Lummus' success and your productivity depend on a drug- and alcohol-free environment, you must report any violations you see, or, as a supervisor, deal with them directly. The Company is committed to maintaining a work environment that is safe for all employees.

### Tips

- If you have a problem with substance abuse, seek professional help before it adversely affects you personally or professionally.
- Never use or be under the influence of any impairing substance on the job. Your impairment could endanger your co-workers and yourself.
- Don't bring alcohol into the workplace by any means or for any purpose not authorized by the Company.
- Except for legal medical prescriptions, don't bring controlled substances into the workplace.
- If you are taking a legally prescribed drug that affects your judgment or reaction time, discuss the situation with your supervisor or Human Resources representative to determine if you should report for work. You should not undertake critical tasks while impaired.
- Follow local laws and customs when they are more restrictive than Company policy.

---

## Health, Safety & Environment

### Policy Overview

Ensuring the health and safety of our employees, our customers and the public is a fundamental value of Lummus. Compliance with all applicable regulations and laws governing employee health and safety, as well as strict compliance with our policies and procedures, are a requirement of employment.

Lummus is committed to preventing all Health, Safety and Environmental (HSE) incidents and has adopted the following principles:

- All occupational and environmental incidents are preventable.
- All operations must be performed safely and with minimal environmental impact.
- All personnel have the right and responsibility to stop any work they feel may be unsafe.

Lummus empowers and expects all employees to perform their duties in accordance with these principles as well as Company policies and procedures.

A safe workplace allows greater productivity, and reduces human and business losses. We want to have an incident-free workplace. Because our target is zero incidents in the workplace, we must relentlessly pursue this goal.

Requirements for the creation and maintenance of a safe work environment are detailed in HSE procedure manuals. The procedures in these manuals are intended to ensure that potential hazards are systematically identified, assessed, and properly controlled, and to ensure that recovery is possible in the event of loss.

Lummus is committed to protecting the environment. All project designs and plans we provide to our clients must comply with applicable environmental laws. Working together, we will remain sensitive to environmental issues as they affect our workplace and our clients.

### Key Requirements

**Commitment, Planning, and Accountability.** Lummus is committed to protecting its employees and the environment. Every manager and employee of Lummus, regardless of their position, must take personal responsibility to report and stop unsafe acts, alerting management of unsafe work practices and potential environmental concerns, and to follow Lummus' HSE policies and procedures. Each of us is expected to comply with applicable environmental laws of each state, country and locality where business is conducted.

**Compliance.** Lummus will comply with all applicable HSE regulations, codes, and standards and will develop and enforce procedures which detail responsibilities for meeting or exceeding these requirements.

**Training.** The Company will provide adequate training to ensure understanding of HSE practices and regulatory requirements.

**Continuous Improvement.** The Company will strive for continuous improvement in its HSE performance through regular measurement and review of its programs and processes. No workplace incident is acceptable. As an employee of the Company, you must first take responsibility for your own safety. You should know and follow all HSE rules, regulations and procedures applicable to your workplace and job. Failing to do so not only increases the risk of injury to yourself and co-workers, but could also lead to disciplinary action up to and including termination.

- Together we can achieve ZERO health, safety and environmental incidents – we all know our responsibilities and train to improve our ability to do our part
- Observe all HSE rules and regulations and report any unsafe or hazardous conditions immediately to your supervisor or site safety personnel.
- Call the Ethics Speak Up Line to report situations not resolved through safety reporting channels or to submit an anonymous report.
- All personnel have the authority to stop work to remove a hazardous or unsafe situation without fear of reprisal.
- Always consider the environment when you design or manufacture. Each of us is responsible to ensure all applicable HSE laws are known and obeyed.

---

## Proper Use of Communication and Information Systems

### Policy Overview

The Company's communication and information systems allow us to conduct business efficiently and productively. Our computers, email, networks and communication systems are Lummus property and are intended primarily for business purposes only. Limited personal use of our communication and information systems is permitted if it does not interfere with the performance of your work. Misuse or abuse of the communication or information systems can expose you and the Company to significant liability. In order to protect the interests of Lummus and our fellow employees, we reserve the right to monitor or review all data and information contained on the Company's servers and on an employee's Company-issued computer or electronic device, as well as the use of the Internet or the Company's intranet.

### Key Requirements

**You Represent Lummus.** You are expected to use the highest standards of behavior and comply with all laws, regulations and Company policies. Remember, when you go online or send an e-mail using Lummus' systems, you are representing the Company. Never do or say anything in an e-mail or on the Internet that might even appear to adversely affect the Company, its public image or that of a customer, partner, associate, client or supplier. Practice safe computing habits including establishing secure passwords, keeping your passwords secret, locking your workstation, not disabling the virus protection software, and not storing company-confidential data on shared public drives without proper authorization.

### Tips

- Any personal use must be in keeping with our Code and must never present a potential or apparent conflict of interest, or be construed as inappropriate for the business environment. The use of Company equipment in the conduct of an outside business or in support of any religious, political, social or charitable activity is prohibited.
- Viewing, uploading, downloading or circulating any of the following is prohibited:
  - Pornography or other sexually explicit material
  - Violent or hate-related messages or material
  - Bigoted, racist or other offensive discriminatory messages aimed at a particular group or individual
  - Malicious, libelous or slanderous messages or material
  - Subversive or other messages or material related to illegal activities
  - Copyrighted or licensed material unless appropriately authorized to do so by the legal owner of the copyright or license
- Accessing or attempting to access unauthorized information or data sources at Lummus or any other site is prohibited.
- Transmitting or downloading information that is disruptive, offensive, threatening, malicious, false, reckless, or otherwise harmful to morale is prohibited.
- Sending unsolicited bulk email, chain letters or joke emails from a Company email account is prohibited.

---

## Public Relations

### Policy Overview

Lummus requires a clear consistent voice when providing information to the public. It is important to protect and to maximize our brand reputation. To this end, we must guard against diminishing this asset through inappropriate comments to the media, in social media or allowing others to freely use our name as a lever to attract public favor through their association with our Company.

Providing Lummus information to any media or third-party web-based information sites is prohibited without the express approval of Corporate Communications.

Also, while your personal participation in the political system is strongly encouraged, remember, you are always doing so as a private citizen. As such, you may never use your name or title, Lummus name or that of its affiliates, nor any company assets, to promote a political cause unless specifically approved by Corporate Communications.

### Key Requirements

**Speak for Yourself.** Unless you are authorized by Corporate Communications or your direct supervisor in conducting your everyday business, never give the impression that you are speaking on behalf of Lummus, either verbally, in writing or electronically. This requirement extends to your participation in on-line forums, blogs, newsgroups, chat rooms, or bulletin boards. Before you hit the “send” button, think carefully.

**Think Twice Before you Hit “Send”.** Never send emails outside of Lummus or post confidential information or material to third party sites that could be perceived as damaging to the Company’s reputation or could potentially benefit our competitors. Even, if you wish to publish positive business related news, including journal articles, you must seek the authorization of Corporate Communications. Even the best of intentions can go horribly wrong. Before you hit the “send” button, think carefully.

### Tips

- Be alert to situations in which you may be perceived to be representing or speaking on behalf of Lummus. Presentations and speeches that become public should be reviewed and approved as appropriate.
- Never communicate with the media, trade publications, information brokers, or data services without proper authorization from Corporate Communications.
- Never discuss financial results, project awards, or other inside information that have not been disclosed to the public.
- In any political setting, make it clear that you are speaking for yourself and not Lummus.
- Always review emails or online postings made outside the company to ensure that such items would not reflect badly on Lummus.



**LUMMUS**  
TECHNOLOGY

---