



CODE OF BUSINESS CONDUCT

INTRODUCTION

Terre Haute Industries and its subsidiaries (“THI”) are committed to conducting business using the highest standards of integrity and excellence. THI’s reputation and the trust and confidence of those with whom we deal are among our most vital corporate assets. With this in mind, THI has adopted certain ethical guidelines and principals to help ensure THI’s integrity is upheld at every level. This Code of Business Conduct (“Code”) sets forth these guiding principles and expectations in order to make THI employees, officers and directors aware of and understand Tahoe’s expectations with respect to their conduct, and to promote universal compliance with these important policies.

WHO MUST COMPLY?

ALL EMPLOYEES, OFFICERS, DIRECTORS AND OUTSIDE STAKE HOLDERS

Every employee, officer, director, and outside stakeholder of THI and its subsidiaries occupies a position of trust. In varying measure, each employee, officer and director, as well as certain contractors and agents, represent THI in its relations with others – whether with customers, suppliers, employees, competitors, governments, investors or the general public.

Whatever the area of activity and whatever the degree of responsibility, each employee, officer, director and other representative of THI is expected to act in a manner that will enhance THI’s reputation for honesty, integrity and the faithful performance of undertakings and obligations.

Accordingly, compliance with the provisions of this Code is mandatory for all employees, officers and directors. Certain contractors, agents and other representatives are also required to comply with this Code. Failure to comply with this Code may result in severe consequences. Conduct that violates this Code may violate federal, provincial or state law and can subject both THI and you to prosecution and legal sanctions. If you violate this Code, you will be appropriately disciplined, which may include discharge from employment.

If you have any questions about this Code or any policies, rules and employee performance standards, you should consult your supervisor or THI’s Legal Department. If you are concerned about conduct you believe may violate the policies of this Code, other THI policies, rules or employee performance standards or the law, you should consult with your supervisor or any management person you are comfortable with to discuss the issue. Procedures for reporting suspected violations of this Code are set out under “Compliance – Reporting Channels” below.



SUPERVISORS

In addition to the responsibilities addressed above, team members who are supervisors have the additional responsibility to:

- Be familiar with this Code and Reporting Channels and other THI policies
- Review and discuss this Code with employees you supervise
- Promote and maintain a climate in which honest, ethical and legal business conduct is expected
- Identify any risks of non-compliance with this Code within your area of responsibility and take appropriate steps to address such risks
- Encourage open discussion and resolution of all ethical concerns

FINANCIAL REPORTING TEAM MEMBERS

In addition to the above responsibilities, team members who have roles regarding internal controls and financial reporting and disclosure controls have, the responsibility to make full, fair, accurate, timely and understandable disclosure in reports and documents that THI files with, or submits to, securities commissions and in other public communications made by THI.

AGENTS AND REPRESENTATIVES OF THI

THI will enter into representation agreements only with companies believed to have a record of, and commitment to, integrity. THI and its employees will ensure that agents, consultants, independent contractors and representatives are aware of this Code.

OTHER POLICIES

You must also read and comply with THI's other policies, including its Whistleblower Policy among others, as well as any policy applicable to employees and directors in a particular country. This Code is intended to supplement, and in some cases summarize, these established policies, procedures, rules and standards, but does not replace them. It continues to be the responsibility of all employees, officers and directors to comply with all such policies, rules and performance standards. Copies of written policies, procedures, rules and standards of employee performance can be found on THI's website or obtained from THI's Human Resources Department.

SUMMARY OF ETHICAL GUIDELINES

You have the responsibility to obey the law and act ethically. This Code has been adopted by



the Board of Directors of THI as a guide that is intended to alert you of significant legal and ethical issues that frequently arise, and to inform you of the mechanisms available to report illegal or unethical conduct. It is not, however, a comprehensive document that addresses every legal or ethical issue that you may confront, nor is it a summary of all laws and policies that may apply. Ultimately, no code of conduct or other policy can replace thoughtful and ethical behavior.

Guidelines to follow:

- Always act legally, ethically, thoughtfully and with integrity
- Avoid activities that conflict with THI's goals and activities
- Report any criminal or fraudulent activities
- Protect THI's assets
- Never discriminate or harass others
- Respect the environment
- Value human rights
- Maintain accurate books and records

STANDARDS OF CONDUCT

COMPLIANCE WITH THE LAW

You shall comply fully with all legal requirements, both domestic and foreign, applicable to THI's business. Many of THI's business activities are subject to complex and changing legal requirements in Canada, Germany, Japan, Austria, Denmark, the United States, Bolivia, Peru and other countries. You must ensure that you are aware of the laws, rules and regulations governing THI's business activities, and that your conduct does not violate these legal requirements.

CONFLICT OF INTEREST AN DISCLOSURE ISSUES

You must avoid all situations in which your personal interests conflict or might conflict with your duties to THI. You should avoid any activity that would tend to:

- deprive THI of the time or attention required to perform your duties properly, or
- create an obligation or distraction which would affect your judgment or ability to act solely in THI's best interest.

You owe a duty to THI to advance its legitimate interests when an opportunity to do so arises, and to refrain from activities which could hinder your ability to act in THI's best interest, have the potential to do so or could be perceived as doing so. You are required to disclose in writing to



THI, all business, personal, commercial or financial interests or activities that might reasonably be regarded as creating an actual or potential conflict with your duties of employment. Such disclosures should be listed on the “Acknowledgement and Disclosure Statement” at the end of this Code. In addition, directors and officers are required under applicable laws and THI’s Corporate Governance Guidelines to disclose any interest in, and refrain from voting on, any material contracts or transactions relating to THI in which they are a party or have a material interest.

OUTSIDE EMPLOYMENT AND BUSINESS ACTIVITIES

Unless you are an officer or senior manager, you are free to take on employment and engage in business ventures, partnerships or enterprises. However, this is permitted only after obtaining approval from your supervisor and if the employment is outside THI’s working hours. You must avoid outside employment, businesses and other activities which would impair your effective performance as an employee of THI, either due to excessive demands on your time, or because such employment, businesses and other activities may be contrary to your obligations to THI or which have an adverse impact on the reputation of THI.

COMMUNITY ACTIVITIES

You may, and are encouraged to, engage in community and volunteer work and political activities outside your working hours. You may promote charitable causes to customers, suppliers and colleagues, provided that those promoting such causes make it clear that your actions are not on behalf of THI. You should exercise caution if generating donations while at work to ensure that customers or suppliers do not feel that they are under any obligation to support the non-profit organization to maintain their relationship with THI, and to ensure that fellow employees do not feel pressured to contribute.

BOARD APPOINTMENTS

You may not sit on the board of a publicly-traded company or other corporate entity without the permission of your supervisor, or in the case of senior officers, the permission of the Chief Executive Officer (CEO). Membership of charitable or community boards does not require pre-approval, but such activity must not interfere with duties and obligations to THI and must not reflect negatively on THI. Executives joining outside boards should be approved by the CEO and the Board.



If you sit on the board of a company (other than THI) or other entity, you must abstain from voting on any matter directly or indirectly concerning THI or any matter likely to go against the interests of THI.

ANTI-BRIBERY AND ANTI-CORRUPTION

The honesty and integrity of those who represent THI must underlie all of THI's relationships, including those with shareholders, customers, suppliers, governments, regulators, professional service providers and others.

INTERACTION WITH PUBLIC OFFICIALS

All interactions between employees, officers and directors of THI and public officials are to be conducted in a manner that will not compromise the integrity or the reputation of any public official or employee, officer or director of THI. Non-routine and high profile contacts with public officials should be handled through or coordinated with the CEO

Even the appearance of impropriety in dealing with public officials is improper and unacceptable. Any participation, whether directly or indirectly, in any bribes, kickbacks, improper profit-sharing arrangements, illegal gratuities, indirect contributions, improper inducements or similar payments to any public official is expressly forbidden, notwithstanding that they might further the business interests of THI.

MONEY-LAUNDERING PREVENTION

THI is committed to comply fully with all applicable anti-money-laundering laws. THI will conduct business only with reputable suppliers and customers who are involved in legitimate business activities and whose funds are derived from legitimate sources. You must take reasonable steps to ensure that THI does not aid or take part in any illegal activities or accept forms of payment that have been identified as a means of laundering money.

ANTI-FRAUD

THI will not tolerate any fraudulent activities whatsoever, and expects you to take reasonable steps to prevent the occurrence of fraud and to report any activity suspected to be fraudulent.

Some common fraudulent activities include:

- Making misrepresentations in THI's financial or other public records



- Theft or misuse of THI's assets, including its mined products, money, equipment or supplies
- Unlawfully paying or receiving money or other items of value
- Unlawfully avoiding the payment of costs and expenses
- Accepting or offering bribes
- Falsifying documents such as reimbursement or expense forms

PROTECTION AND USE OF THI'S ASSETS

You have a responsibility to prevent misuse, loss, unauthorized destruction or damage or theft of THI's assets, including not only its products, money, equipment and supplies, but also its confidential information and intellectual property. Reasonable precautions should be regularly taken to secure these assets.

In addition, you may only use THI's assets for the benefit of THI. Use of THI's funds or assets for any unlawful or improper purpose is prohibited and will subject you to disciplinary procedures or termination.

BUSINESS EXPENSES

Claims for business expenses must be made consistent with THI's expense policies. Excessive, fictitious or unnecessary claims are prohibited and will subject you to disciplinary procedures or termination.

CONFIDENTIAL INFORMATION

You must safeguard Tahoe's Confidential Information. "Confidential Information" includes trade secrets, know-how, records, data, plans, strategies, processes, business opportunities and ideas relating to present and contemplated products and services and financial affairs of THI, its customers, its suppliers, its competitors and/or other employees. Confidential Information is information which is not generally known to the public and is useful or helpful to THI and/or would be useful or helpful to competitors of THI. Common examples include, but are not limited to:



- financial data
- supplier lists
- customer lists
- capital investment plans
- projected sales or earnings
- proprietary organic, chemical processes
- production plans and methods
- any document labeled “confidential” or “proprietary”

You may not disclose to the public information which might impair THI’s ability to compete or which might violate the private rights of individuals, enterprises or institutions. You also may not disclose or discuss with the public any Confidential Information without authorization.

Confidential Information shall not be disclosed to any third party until an appropriate confidentiality agreement has been signed by that third party. Confidential Information received from a third party shall be treated as if it were THI’s Confidential Information.

However, disclosure of Confidential Information may be made for legitimate purposes such as full and complete reporting to governmental, regulatory or enforcement agencies. The above rules also apply to information which THI has obtained from a customer or supplier (or prospective customer or supplier) on condition of confidentiality. These obligations to maintain confidentiality of Confidential Information apply even if you are no longer employed by THI.

You are responsible and accountable for protecting THI’s business information, including electronic mail and voicemail, and you must take appropriate steps to protect such information. You should always try to prevent inadvertent disclosures, which may arise in either social conversations or in normal business relations with suppliers and customers.

You should handle documents containing sensitive data very carefully during working hours and must be properly secured at the end of the business day. In particular, you must pay attention to secure data stored on the computer system. You must maintain the secrecy of your password and lock sensitive or valuable equipment when not in use.

INTELLECTUAL PROPERTY

All information, technology and intellectual property, including, but not limited to, all creative materials, programs, designs, inventions, developments, strategies, etc. developed by you during the course of employment with THI belong to THI and you assign to THI all rights you may have in the information, technology and intellectual property. Even after termination of employment,



intellectual property materials shall remain with THI. You must take reasonable steps as requested by THI to confirm ownership of such materials in THI, and to enable THI to perfect and maintain its title to such information, technology and intellectual property. You waive all rights in such information, technology and intellectual property.

Use of THI's name or intellectual property by a supplier requires approval in writing by THI. THI shall not use the name or intellectual property of a supplier without the supplier's consent in writing.

POLITICAL AND CHARITABLE CONTRIBUTIONS

The use of THI's funds, goods or services as contributions to political parties, candidates, campaigns or charities is forbidden, unless authorized by the CEO, and the contribution is in accordance with any approved donations budget. Contributions include money or anything having value, such as loans, services, excessive entertainment, trips and the use of THI's facilities or assets.

WORK ENVIRONMENT AND EMPLOYEE RELATIONS

DISCRIMINATION-FREE WORK ENVIRONMENT

THI strives to maintain a work environment free of discrimination and harassment, and in which individuals are given equality of employment opportunity based upon merit and ability.

Discriminatory practices based on race, ancestry, place of origin, color, national or ethnic origin, citizenship, faith, gender, sexual orientation, religion, marital status, family status, same-sex partnership status, age, record of offences, handicap or other prohibited grounds of discrimination under applicable law will not be tolerated.

HARRASSMENT FREE AND NON-RETALIATION

It is the responsibility of each of you to help THI provide a work atmosphere free of harassing, abusive, disrespectful, disorderly, disruptive or other non-professional conduct. Sexual harassment or bullying in any form, verbal or physical, by any employee, will not be tolerated. THI requires you to show sound judgment and respect for the feelings and sensibilities of all other employees.



If you believe you have been subject to repeated harassment or offensive conduct, you may report the offense to the Human Resources Department or Direct Supervisor. THI will promptly investigate every complaint of harassment or improper or offensive conduct.

EQUAL OPPORTUNITY

THI is committed to a program to assure fair employment, including equal treatment in hiring, promotion, training and compensation, termination, and disciplinary action.

EMPLOYEE PRIVACY AND PERSONAL INFORMATION

THI believes in taking steps to protect the privacy of its employees, officers, directors, contractors, agents and other representatives. THI will not interfere in your personal life unless your conduct impairs your work performance or adversely affects the work environment or reputation of THI.

THI only collects personal information that is necessary for business, legal, security or contractual purposes, and does so only by fair and lawful means with the knowledge and consent of the individual from whom the information is being collected. Access to your personnel and medical records and the information contained therein shall be limited to those with a need to know for a legitimate business purpose. You have the right to see your own personnel record. Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the knowledge and consent of you or as required by law. Personal information shall be retained only as long as necessary for the fulfilment of those purposes and shall be kept sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used or disclosed.

THI will observe obligations of confidentiality and non-disclosure of personal information, including information of its employees and customers, with the same degree of diligence that you are expected to use in protecting confidential information of THI. THI is responsible for all personal information in its possession or custody, including information that has been transferred to a third party for processing, and you shall adhere to THI's policies and procedures in place to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. THI shall also comply with all applicable laws regulating the disclosure of personal information.

SUBSTANCE AND ALCOHOL ABUSE



The use, possession, sale, purchase and the negotiation for sale or purchase of illegal substances or alcohol on the job or on THI's property is prohibited. However, alcohol may be consumed at authorized Corporation social events. The abuse or improper use of prescription or over-the-counter drugs while on the job or on THI's property is also prohibited. You are prohibited from using drugs or alcohol in a manner which adversely affects job performance or compromises the safety of other persons. THI reserves the right to conduct random tests of employees for illegal drug use.

WORKPLACE SECURITY

THI is committed to ensuring the safety of its employees as well as the security of its assets. THI's representatives are permitted to direct the search of persons, vehicles or property located on THI's premises, in accordance with applicable laws. All employees as well as suppliers, consultants, etc. are expected to cooperate by allowing a search of their persons and property on THI's premises.

THE ENVIRONMENT AND NATURAL RESOURCES

PROTECTION OF THE ENVIRONMENT AND SUSTAINABILITY

THI is committed to the protection of the environment and natural resources. In general, THI's Environmental Policy is to meet or exceed all applicable governmental requirements and promote sustainable development that will minimize risks to the environment. THI works cooperatively with government agencies and local communities to achieve safe and effective use and disposal of all materials and resources. THI is also committed to updating its operations to improve efficiency, reduce energy use and preserve resources. You are responsible for helping achieve THI's commitment to protect the environment by:

- Being aware of and understanding all environmental requirements related to your position
- Apply best practices to prevent any environmental harm and mitigate impacts
- Comply with all environmental laws and regulations
- Conserve energy resources to the fullest extent possible consistent with sound business operations

OCCUPATIONAL HEALTH AND SAFETY

Your health and safety is a matter of paramount concern for THI. THI's policy is to provide a workplace free of hazards and to comply with all laws and regulations governing workplace health and safety. Most accidents and injuries are preventable, and to avoid needless injury, you



must follow all of THI's safety and health rules. Managers and supervisors also must know and understand the workplace safety laws and regulations that apply to their areas of responsibility and ensure compliance with them.

In order to help THI achieve its health and safety goals, you should:

- Be aware of and understand all health and safety protocols and requirements related to your position
- Apply best practices to prevent any health and safety hazards
- Comply with all health and safety laws and regulations
- Report possible safety problems to your supervisor or other appropriate management personnel
- Make suggestions regarding appropriate safety controls and warnings
- Participate in THI's safety programs on a continuing basis
- Practice safety first at home and off-the-job locations

INFORMATION TECHNOLOGY

THI's information technology systems, including computers, email, intranet and internet access, telephones and voicemail are the property of Tahoe and are to be used primarily for business purposes. THI's information technology systems may be used for minor or incidental personal messages provided that such use is kept at a minimum and is in compliance with THI policies.

You may not use THI's information technology systems to:

- Allow others to gain access to THI's information technology systems through the use of your password or other security codes
- Send harassing, threatening or obscene messages
- Send chain letters
- Access the internet for inappropriate use
- Send copyrighted documents that are not authorized for reproduction
- Make personal or group solicitations unless authorized by a senior officer
- Conduct personal commercial business
- Carry out political activities

You must use information technology systems efficiently, minimize unnecessary messages to others, and refrain from activities that will jeopardize the normal business operation of the system. Computer system passwords and/or user identifications must not be disclosed to anyone



except in accordance with THI policies. You should always use a high standard of professionalism when using THI's information technology systems.

All information of any kind (including without limitation voice communications and electronic messages) stored or transmitted on THI's systems is the property of THI, and THI has the right to inspect and/or audit any communication or material stored, downloaded, accessed, posted, transmitted or distributed on the employee's computer or voicemail at any time for any purpose, without prior notice to the employee. Communications of any nature on these systems should not be considered private communications.

COMPETITION AND TRADE STANDARDS

THI shall compete vigorously and creatively in its business activities, but its efforts in the marketplace shall be conducted in a fair and ethical manner in strict compliance with applicable competition and trade practice laws and regulations.

THI's policy is to comply with all applicable laws and regulations addressing competition and trade practices. Violations of these laws can subject THI to heavy fines and criminal and other sanctions. If you authorize or engage in acts in violation of such laws, you may also be personally subject to substantial fines and to imprisonment.

Because competition laws are complex and the application of such laws is fact-specific, you should refer matters you have questions about to your supervisor who, if necessary, should consult with THI's Legal Department.

CUSTOMS COMPLIANCE

It is the policy of THI to comply fully and in all respects with all applicable laws and regulations governing the importation of goods and services into any country. Compliance with this policy is mandatory for any employee, agent or contractor of THI that controls or is involved with any part of the importation/exportation process, commencing with the sourcing of imported goods (including such items as product samples, machine parts and raw materials) through final payment for the same.

GIFTS AND ENTERTAINMENT

You shall not use your position with THI to solicit any cash, gifts, trips or free services from any of THI's customers, suppliers or contractors for your personal benefit. Nor may any of your family members or friends use your position with THI for this purpose. Gifts or entertainment from



others should not be accepted if they could be reasonably considered to be extravagant for you, or otherwise improperly influence THI's business relationship with or create an obligation to a customer, supplier or contractor.

Guidelines to follow:

- Nominal gifts and entertainment, such as logo items, pens, calendars, caps, shirts and mugs are acceptable
- Reasonable invitations to business-related meetings, conventions, conferences or product training seminars may be accepted
- Invitations to social, cultural or sporting events may be accepted if the cost is reasonable and your attendance serves a customary business purpose such as networking (e.g. meals, holiday parties and tickets)
- Invitations to golfing, fishing, sports events or similar trips that are usual and customary for your position within THI and the industry and promote good working relationships with customers, suppliers and contractors may be accepted provided that, in the case of employees, they are approved in advance by their manager

RESPECT FOR HUMAN RIGHTS

THI respects and integrates human rights into all facets of its business. THI will only deal with suppliers who comply with applicable legal requirements and any of THI's standards relating to human rights, labor, environment, health and safety, intellectual property rights, refraining from improper payments and prohibitions against child or forced labor.

GATHERING COMPETITIVE INFORMATION

You will not use improper or illegal means of gathering information about competitors or other third parties. Theft or illegal entry and electronic eavesdropping are obviously unacceptable means of searching for competitive intelligence. You must not offer a bribe or a gift in exchange for a competitor's information nor solicit information from a competitor's ex-employee now working for THI.

RECORDING OF TRANSACTIONS AND REPORTING OF FINANCIAL INFORMATION

FINANCIAL REPORTING

The integrity of THI's financial reporting is of particular importance as shareholders rely on THI to provide complete and accurate information. The dissemination of financial statements that



contain materially misleading information can cause serious legal difficulties for both THI and its employees.

THI's books and records must fully and fairly disclose, in an accurate, timely and understandable manner, all transactions and dispositions of the assets of THI.

The integrity of THI's record-keeping and reporting systems shall be maintained at all times. You must document and record all transactions in accordance with all applicable accounting principles, laws, rules and regulations. You shall not use, authorize, or condone the use of "off-the-books" record-keeping or any other device that could be utilized to distort records or reports of THI's true operating results and financial conditions. Maintenance of falsified, inaccurate or incomplete records can subject you and THI to civil and criminal penalties.

All funds and assets are to be recorded and disclosed. Employees with responsibility for reporting financial information shall provide information that is accurate, complete, objective, timely and understandable and complies with all applicable laws relating to the recording and disclosure of financial information.

You shall not fraudulently influence, coerce, manipulate or mislead any independent public or certified accountant engaged in the performance of an audit of the financial statements.

RECORD RETENTION AND DESTRUCTION

Certain records received or generated by THI must be retained for specified periods of time; other records should be purged on a regular basis. Legal and regulatory practice requires the retention of certain records for various periods of time, particularly in the tax, personnel, health and safety, food safety, environmental and financial areas. Failure to retain documents for such minimum periods may subject THI to penalties and fines or place THI at a serious disadvantage in litigation. In addition, when litigation or a governmental investigation or audit is pending or imminent, relevant records must not be altered or destroyed until the matter is closed. Destruction of records to avoid disclosure in a legal or governmental proceeding may constitute a criminal offense.

PUBLIC RELATIONS

INTERACTION WITH THE MEDIA

THI is committed to providing, as appropriate, full and prompt disclosure to the media of material developments and events.



However, all media relations are to be coordinated through the authorized spokesperson. You should not comment on any inquiry from the media, no matter how simple and harmless the inquiry may appear. If you are asked for a statement by the media, you should explain this policy and refer the matter to the CEO.

COMPLIANCE

DISTRIBUTION OF THE CODE

Each employee of THI and its subsidiaries who has executive, managerial or supervisory responsibilities, or deals on behalf of THI with government officials or political parties or candidates, or who has access to confidential information, as well as each officer and director of THI and its subsidiaries of THI will be provided a copy of this Code. This Code is also available on THI's website, along with THI's other corporate governance policies.

At the commencement of employment and every year thereafter, each employee, officer and director who receives this Code shall sign the "Acknowledgement and Disclosure Statement" attached to this Code, which will be retained by the Human Resources Department as confirmation that each employee has read and understands the current version of this Code.

MONITORING COMPLIANCE

THI reserves the right to audit compliance with this Code. Accordingly, you shall afford any external or internal auditors full, free and unrestricted access to all of THI's operations, records, facilities and personnel and will take appropriate measures to safeguard information obtained through the audit process.

DUTY TO REPORT

You have a duty to report any violations of this Code and failure to do so may result in disciplinary action, including termination. Managers, officers and directors may also be subject to disciplinary action if they do not demonstrate the appropriate leadership to ensure compliance with the Code or do not report violations of the Code.

If you become aware of a violation or possible violation of this Code or any of THI's statements and policies, you must report that information immediately under the provisions of THI's Whistleblower Policy.



REPORTING CHANNELS

If you are concerned about conduct you believe may violate the policies of this Code, other THI policies, rules or employee performance standards or the law, consult with your supervisor or any other person in local management with whom you feel comfortable discussing the issue. If reporting a concern to your supervisor or any other person in local management is not possible or advisable for some reason, or if it does not resolve the matter, promptly contact THI's CEO.

All investigations pertaining to a breach of this Code will be carried out in accordance with the rules and procedures set out in THI's Whistleblower Policy.



APPENDIX A

ACKNOWLEDGEMENT AND DISCLOSURE STATEMENT

I acknowledge that I have received a copy of the Terre Haute Industries Code of Business Conduct (“Code”) and that I have read the Code this year. I understand the provisions of the Code and I acknowledge and accept that my continued employment or engagement may be dependent upon my compliance with the Code. I understand that THI may require that I execute renewals or alternative versions of this acknowledgement and disclosure statement. I also understand that I have an obligation to report any violation of these rules and policies in the manner set forth in the Code.

LIST OF TRANSACTIONS, AFFILIATIONS, VENTURES, PARTNERSHIPS, OUTSIDE EMPLOYMENT OR ACTIVITIES (If none, please check “I have nothing to disclose” below. If there are such disclosures or if you are not sure, list these below, using attachments if necessary.)

I have nothing to disclose.

I disclose the following:

EMPLOYEE SIGNATURE

NAME OF EMPLOYEE

DATE

TITLE

LOCATION