

It is the policy of Cleeve Technology Incorporated to conduct its business affairs in compliance with all applicable laws, statutes, rules and regulations and expects all directors, officers and employees acting on its behalf to do likewise.

In addition, business dealings among Employees and by Employees with customers, suppliers, governmental and regulatory authorities, communities and shareholders must be based on principles of honesty, integrity and the ethical standards outlined below.

Cleeve Technology shall keep proprietary information of third parties to which they have gained access in accordance with the terms of its disclosure and in strict compliance with all applicable laws and regulations.

Cleeve Technology will not solicit or accept a third party's proprietary information (whether provided by a customer or otherwise), such as bid and proposal information, or technical or price data, unless the owner of the data has agreed to its release.

Cleeve Technology shall comply fully with all anti-bribery laws applicable with the conduct of their business.

Cleeve Technology will not offer, promise, or provide any undue pecuniary or other advantage to public officials, political parties or political candidates, or to any private party, in order to obtain or retain business or gain any other improper advantage in the conduct of the business.