



The Lee Company Code of Conduct and Ethics

The Lee Company (“TLC”) designs and builds state of the art products that exceed customers’ expectations for utility, performance, and quality. TLC constantly strives to improve our product designs, manufacturing processes, and quality systems. The ultimate goal is zero defects and a satisfied customer.

In pursuing that goal, our directors, officers, employees, and business partners are all expected to operate consistently with applicable laws, our contractual arrangements, and this Code of Conduct and Ethics (“Code”). This Code summarizes the key principles and rules of how we do business. No one associated with TLC is exempt from these principles and rules. We will not engage in business with those whose conduct conflicts with this Code. Because this Code cannot address every potential situation which may arise, it also serves as a source of guiding standards, and questions about its scope or application should be directed to the Chairman of the Board of Directors.

I. Human Rights & Anti-Discrimination

TLC complies with all State of Connecticut and United States Federal laws related to labor wages, hours, overtime pay, breaks, holidays and freedom of association. We also certify that we do not engage in any form of human trafficking, slavery or child labor.

A culture of equal opportunities, mutual trust, and respect is of great importance to us. It is the policy of TLC to provide equal opportunities to all employees and vendors without regards to race, color, religious creed, sex, marital status, sexual orientation, gender identity, ancestry, national origin, citizenship status, age, religion, medical condition, mental or physical disability, veteran status, military service, pregnancy, childbirth or related medical condition, genetic information or any other class or characteristic protected by federal, state or local law.

II. Anti-Corruption

Our employees and suppliers must comply with the anti-corruption laws, directives, and/or regulations that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act (“FCPA”). Employees may not bribe anyone for any reason, regardless of whether the person serves a role in government or the private sector. The FCPA, and similar laws in other countries, prohibit offering or giving anything of value, directly or indirectly, to government officials in order to obtain or retain business. Employees may not make illegal payments to directly or by or through a third party. Employees who are conducting business with the government officials of any country must contact the Chairman of the Board of Directors for guidance on the law governing payments and gifts to governmental officials.

In the course of doing business with prospective or current customers and vendors in the private sector, it is not unusual for business to take place over meals. Modest meals, gifts of nominal value and the like are acceptable. If there are any doubt as to the appropriateness of such an offering, employees are directed to seek guidance from their supervisor.

If any employee becomes aware of any potential violation of these anti-corruption principles related to TLC’s business operations, he or she must immediately notify their supervisor, who must promptly consult with the Chairman of the Board of Directors to determine the appropriate course of action.

TLC requires all of its suppliers to comply with these standards, without exception, and to provide appropriate instruction to its personnel and those with whom they do business in order to avoid any potential violations.

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III. Conflict of interest

TLC expects employees to act in the best interest of the company and with the highest integrity. Private and personal interest should not affect any business decision. TLC and its business partners should avoid any activity or situation that may lead to a conflict of interest between the parties. If any employee becomes aware of any conflict of interest, he or she must immediately notify their supervisor, who must promptly consult with the Chairman of the Board of Directors to determine the appropriate course of action. Likewise, if any business partner becomes aware of a conflict of interest the Chairman of the Board of Directors must be notified immediately.

IV. Information Protection

Our technology and knowledge give TLC a competitive advantage. We must maintain this edge by partnering with our employees and suppliers to protect our proprietary information. Employees and business partners are responsible for safeguarding TLC's confidential information and intellectual assets.

Our employees, as well as our suppliers' employees should use extreme care in protecting all types of sensitive information.

If sensitive information is to be discussed or exchanged between TLC and its business partners a mutual non-disclosure agreement will be signed.

If a supplier becomes aware of any violation of TLC's intellectual property rights, then the supplier should notify the Chairman of the Board of Directors of TLC immediately. Likewise, if any employee of TLC becomes aware of any violation of a business partner's intellectual property rights, he or she must immediately notify their supervisor, who must promptly consult with the Chairman of the Board of Directors to determine the appropriate course of action.

V. Environmental, Health, and Safety

TLC, and its suppliers, are expected to comply with all applicable environmental, health and safety laws, regulations, and directives. TLC is committed to protecting the health, safety and welfare of its employees, visitors, and others who may be affected

by their activities, and expects their suppliers will as well.

VI. Global Trade Compliance

A. Export Control Laws

TLC, and its suppliers shall comply with the laws and regulations of the United States of America (USA) relating to exports and foreign transactions, including but not limited to: the International Traffic in Arms Regulations (22 CFR, parts 120-130) and the Export Administration Regulations (15 CFR, parts 730-774). TLC certifies that it has an export compliance program in place to adhere to these regulations. TLC expects its suppliers to ensure their business practices are in accordance with all applicable laws, directives, and regulations governing the export of parts, components and technical data.

B. Conflict Minerals

TLC is a privately held corporation and is not subject to the SEC's Conflict Minerals reporting requirements. However, as a supplier to publicly traded companies TLC is committed to assisting its customers in complying with their reporting requirements. TLC has in place a system that allows for a responsible Country of Origin inquiry with its supply base.

C. Fair Competition Laws

TLC's mandate in the global marketplace is to compete fairly and honestly. Included in this mandate is the prohibition on employees discussing prices or making any formal or informal agreement with any competitor of TLC regarding prices, discounts, business terms, or the market segments and channels in which TLC competes, where the purpose or result of such discussion or agreement would be inconsistent with applicable antitrust laws. Any questions about this section or the applicable antitrust laws should be directed to the Chairman of the Board of Directors.

TLC requires that its suppliers compete in the same manner and abide by the laws that deal with agreements among competitors or resellers, price discrimination, price fixing, and other acts or situations that may unfairly reduce competition.

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D. Prevention of Money Laundering

TLC complies with all legal obligations to prevent money laundering and expressly does not participate in money laundering activities. If in doubt, employees are required to report unusual financial transactions, especially those involving cash which could give rise to suspicion of money laundering, to the Chairman of the Board of Directors for review.

VII. Quality

Suppliers must take due care to ensure their work product meets TLC's quality standards. TLC expects its suppliers to have in place quality assurance processes to identify defects and implement corrective actions and to facilitate the delivery of a product whose quality meets or exceeds the order requirements.

A. Counterfeit Parts

TLC expects its suppliers to develop, implement, and maintain effective methods and processes to detect and minimize the risk of introducing counterfeit parts and materials into its supply chain. Suppliers should have effective processes in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

VIII. Reporting of Potential Violations/Anti-Retaliation

A. Obligation to Report

All behavior (either by, or toward, personnel of TLC) which is believed to be potentially in violation of applicable laws, this Code, or otherwise unethical or improper must be immediately reported to the Chairman of the Board of Directors.

B. Anti-Retaliation

TLC is committed to an atmosphere in which employees and others feel safe to engage in honest

and candid communication, to raise questions or concerns at any time without fear of retaliation.

TLC strictly prohibits any form of retaliatory action against employees, officers or directors who raise concerns; make reports; ask questions; cooperate with an investigation; decline to participate in suspected violations of company policy or law or any other unethical or wrongful activity; or exercise a workplace right which is protected by law.

Protection from retaliation exists even if the issues raised are not confirmed following a review or investigation.

If an employee, officer, or director knowingly raises a false concern or makes a false report, provides false or misleading information in the course of an investigation, or otherwise acts in bad faith, then adverse action may result. Additionally, this anti-retaliation policy does not exempt employees from the consequences of their own misconduct or inadequate performance, and self-reporting such issues may not protect that person from adverse personnel actions and other adverse consequences.

IX. Violations

For officers and employees, behavior determined to be in violation of applicable laws, this Code, or otherwise unethical (including the failure to report a potential violation by another person or persons) can lead to adverse personnel actions, up to and including termination of employment.

Likewise for suppliers, behavior determined to be in violation of applicable laws, this Code, or otherwise unethical (including the failure to report a potential violation by another person or persons) may be cause for termination of their relationship with TLC.

X. Board of Directors

With respect to their service on behalf of TLC, all members of our Board of Directors must comply with the relevant provisions of this Code, including with respect to conflicts of interest and compliance with all applicable laws, rules and regulations.