

# **Bestica Code of Conduct**

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## Code of Conduct

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### Introduction

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At Bestica's, high standards of professional conduct and ethics are essential for us to achieve our goals. We rely on the good judgment of our employees, associates and agents to comply with the law, act with integrity, and safeguard the company's reputation in every situation. Our culture is based on trust, mutual respect and high standards of professional conduct and ethics. The Code of Conduct makes it clear our basic expectations of employee and all those with whom we do business.

Bestica is fully committed to maintaining a high degree of integrity, ethics and compliance, conducting every business transaction in compliance with the spirit and letter of the law and Bestica policies. Strict adherence to the Code of Conduct will help to ensure that Bestica and its employees prosper and maintain this objective of doing business with integrity.

The Code of Conduct provides an introduction to important laws and policies that must be followed. The Code of Conduct may not seem entirely new. Indeed, the Code of Conduct memorializes, organizes and summarizes various practices that have been ongoing at Bestica.

The Code of Conduct is designed to help each of us:

- Understand and follow the basic ethics and compliance rules that apply to our jobs
- Know when and where to ask for advice

### Who Must Follow This Code of Conduct?

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This Code of Conduct applies to all Bestica employees, including Field Employees, Corporate Employees, Managers, Sr. Management, and the company President. The policies and guidelines are for employees of all statuses as well; PRN, temporary, part time, and full time. It is important to remember, no one has the authority to instruct or authorize anyone to violate any law or engage in unethical conduct. This Code of Conduct may also apply to independent third parties hired by or working with Bestica.

### Your Personal Pledge to Do the Right Thing

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This Code of Conduct represents a commitment by Bestica to do business with integrity. By working with Bestica, you are agreeing to uphold this commitment. Understanding this Code of Conduct and the company policies that apply to you is an essential function of your job. Employees who fail to follow these standards put themselves, their co-workers, and Bestica at risk. Such employees are also subject to disciplinary action up to and including termination of employment.

### What About Those Who Supervise Others?

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Supervisors and managers have an affirmative duty under this Code of Conduct to:

- Set an example – showing what it means to act with integrity
- Ensure that those they supervise have adequate knowledge and resources to follow the Code of Conduct's standards
- Consult with Bestica ethics and compliance advisers to obtain clarity or support on ethics and compliance issues
- Monitor compliance of the people they supervise
- Enforce the standards of the Code of Conduct and all other related company standards
- Support employees who in good faith raise questions or concerns about compliance and integrity

- Never retaliate or permit retaliation
- Report instances of noncompliance to the proper management level

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### Does This Code of Conduct Explain All the Standards I need to Know?

This Code of Conduct is the cornerstone of Bestica’s commitment to integrity. However, this Code of Conduct is not intended to describe every law or policy that may apply to you. To learn more about the other laws, regulations, standards and policies that may apply to you, ask for clarification on the terms of the contract applicable to your work, speak with your manager or their superior, or the Compliance Officer. Your position description and orientation information from the company and your assigned facility are important resources for additional information regarding your responsibilities. Always make sure you know the additional rules that apply to you as you are responsible for them.

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### Bestica Offers Ongoing Training Opportunities for Compliance and Ethics

All Bestica employees have ongoing training opportunities available to them through the Bestica Paycom website and company newsletter. Visit the Compliance tab on [www.Bestica.com](http://www.Bestica.com) where you will find our Code of Conduct. The company newsletter also addresses relevant compliance issues with articles, employee accounts, and helpful notices. Both of the resources are important for employees from all levels at Bestica.

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### Your Duty to Speak Up

See something? Hear something? Say something!

Bestica strives to create a culture based on trust and individual responsibility. Employees may, however, encounter unethical, unsafe or illegal behavior while at work. Bestica is committed to providing a comfortable environment for employees to report such behavior. Each employee has the responsibility to speak up if something does not seem right.

Confidentiality will be maintained to the extent consistent with the best interest of the employees involved, the company and the company’s obligations to act ethically and responsibly.

Your supervisor is typically the best place to start with a compliance, safety or integrity issue. However, you may also seek advice or report concerns to any manager of Bestica or the Compliance Officer. The Compliance Officer at Bestica administers the compliance program and is accessible by calling the company headquarters in San Antonio. If you have any questions or concerns regarding any area of the Code of Conduct reach out to the Compliance Officer for guidance or clarification.

Additional methods for reporting potential compliance violations or safety concerns for investigation include:

- The employee hotline—this number goes to a confidential hotline for reporting. The number is: 469.206.8437.
- The anonymous reporting form found on the company website—this is found under the “Compliance” page at <https://bestica.com/compliance.html> and allows for you to choose if you wish to remain anonymous and if not, allows you to provide your contact information for a Compliance representative to investigate your concerns and to respond to you with an outcome. The form is sent directly to the Compliance Officer.
- Any individual or organization that has a concern about the quality and safety of patient care delivered by Bestica’s healthcare providers which has not been addressed by Bestica

management is encouraged to contact the Joint Commission at [www.jointcommission.org](http://www.jointcommission.org) or by calling the Office of Quality Monitoring at 630.792.5636.

Each year both corporate and field employee will receive a copy of the updated code of conduct and be required to sign the Code of Conduct acknowledgment form indicating they understand and will follow the basic ethics and compliance rules that apply to their job.

If a violation of this Code is found, the Company will take appropriate disciplinary action, up to and including termination. In addition, the Company may pursue any and all legal remedies available to it, including legal action.

### Anti-retaliation

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Bestica has a no tolerance policy on retaliation of ANY kind committed by ANY employee. This includes taking any action with the intent to retaliate. These policies protect any employee who makes a report in good faith of a potential violation of the Code of Conduct or participates in an investigation of any such reports. No employee making such a report in good faith will be discriminated against in terms and conditions of employment as a result of having made a report. Retaliation or a threat of retaliation is a serious violation of this Code of Conduct that will result in appropriate disciplinary action, up to and including termination of employment of anyone who retaliated against an employee.

### Conducting Business

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Bestica is fully committed to maintaining a high degree of integrity, ethics and compliance, conducting every business transaction in compliance with the spirit and letter of the law and Bestica policies. High standards of professional conduct and ethics are essential for Bestica to achieve its goals. We rely on the good judgment of our employees to comply with the law, act with integrity and safeguard the company's reputation in every situation. Our culture is based on trust, mutual respect and high standards of professional conduct and ethics. This Code of Conduct makes clear our basic expectations of our employees and all those with whom we do business.

### Whistle Blower Protection

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Bestica has a strict whistle blower protection policy to safeguard employees who report potential wrongdoing. All claims reported in good faith will be covered under this policy. After an investigation is completed, the employee who reported the potential violation is still protected whether the report was correct or incorrect. Employees are encouraged to report wrong-doing when they see or hear of it and will not be penalized for helping to keep all members of our organization doing the right thing.

### Conflicts of Interest

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Bestica understands the importance of building and maintaining the trust of our employees, clients, subcontractors and other stakeholders. Conflicts of interest, or the appearance of conflicts, jeopardize the trust in Bestica's good name. A conflict of interest may take place in any situation where a Bestica employee's personal, social, financial or political activities have the potential of interfering with their professional objectivity or position duties at Bestica. Bestica employees must avoid any situation that would create a conflict, or even the appearance of conflict, between their private interests and the interests of Bestica.

## Terms Defined

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When deciding if a situation poses a real or potential conflict of interest, employees must consider situations involving both themselves and/or their “family members.” “Family members” are defined as a spouse, domestic partner, parents, children, a spouse’s parents, the employee’s or spouse’s siblings and their spouses, and any person in the employee’s household. Also, third parties that must be considered by employees in reporting conflicts of interests are:

- Competitor – A person offering for sale, selling, or planning to offer or sell products or services in competition with Bestica, or any party with which Bestica has teamed or contracted with on a particular project.
- Client – Any person or entity who Bestica seeks as a client or who currently buys, rents, or otherwise procures from Bestica, any goods or services.
- Vendor – Any person who does or seeks to provide any goods or services to Bestica.

Conflicts of interest can take many forms; this Code of Conduct addresses several of them. It is the responsibility of each employee to do their best to prevent conflicts of interest or the appearance of them by seeking advice when there may be a conflict. It is also each employee’s responsibility to report all situations that might present a real or potential conflict of interest. Any employee that becomes aware of any transactions or relationships that may give rise to a conflict of interest must disclose the transaction or relationship. An employee’s direct supervisor or the Compliance Officer is the appropriate resources for reporting potential conflicts of interest or to ask questions.

Disclosure of a conflict may not resolve the conflict. Once a conflict is disclosed, the supervisor or Compliance Officer will work with the employee to address the risks associated with the conflict. This process may include termination of the arrangements that created the conflict.

### Presumed Conflicts which MUST be Disclosed and Resolved

Employees must disclose any of these circumstances that involve themselves or their family members:

- An employee’s position at Bestica involves dealing with a family member as a competitor, vendor, or client of Bestica
- Employment at Bestica and at any other place at the same time if that employment negatively impacts the time or attention that must be devoted to Bestica’s affairs
- Employment by Bestica and by anyone else at the same time that is a present or potential competitor, vendor, or client of Bestica
- Holding of any substantial financial interest in any competitor, vendor, or client of Bestica. “Substantial” means an interest valued at more than 50% of your annual Bestica salary. The term “financial interest” refers to any form of ownership or partial ownership, but does not include interests in publicly traded mutual funds, index funds, or similar pooling of securities. NOTE: Ownership of securities acquired as part of a stock purchase plan for employees during prior employment need not be disclosed, but additional purchases of such stock must be disclosed if in excess of 50% of Bestica salary
- Acceptance of membership on the board of directors of any competitor, vendor, or client of Bestica, or as a consultant or advisor to any such board of directors or to the management of such firm or person
- Lending money, guaranteeing debts, borrowing money, or accepting gifts or favors in a way that could appear to place an employee under obligations to a competitor, vendor or client of Bestica.

### Personal Conflicts of Interests (FAR Subpart 3.11)

In addition to conflicts arising between the interests of Bestica personnel and the interests of the company, employees, managers, and principals of Bestica may also be subject to a “personal conflict of interest,” which FAR 3.1101 defines as a “situation in which a covered employee has a financial interest, personal activity, or relationship that could impair the employee’s ability to act impartially and in the best interest of the government when performing under the contract.” Personal conflicts of interests are a special category of conflicts for Bestica employees that, in addition to the requirements above, may subject employees to specific rules under FAR Subpart 3.11. Covered employees are those that perform acquisition functions closely associated with inherently governmental functions, such as planning acquisitions, determining what supplies or services are to be acquired by the government (including developing statements of work), developing or approving any contractual documents, evaluating contract proposals, awarding government contracts, administering government contracts, terminating contracts, or determining whether contract costs are reasonable, allocable and allowable.

In the event Bestica performs a contract that includes a requirement for services by Bestica employee(s) that involve performance of acquisition functions closely associated with inherently governmental functions, and is thus subject to FAR 52.203-16, Preventing Personal Conflicts of Interest, Bestica employees will be required to submit, maintain and update detailed statements disclosing interests that might be affected by the task to which an employee has been assigned in accordance with FAR Subpart 3.11, including financial interests of the employee and their close family members. Covered employees will also be required to sign non-disclosure agreements to prohibit disclosure of non-public information accessed through performance of a government contract. Additionally, employees subject to personal conflicts of interests may be excluded from working on a particular government contract, and may be disciplined by Bestica for failing to disclose and update any personal conflicts of interests. For a complete list of requirements and obligations, see FAR Subpart 3.11.

### Confidential Information

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In the course of performing your duties, you may, from time to time, be placed in a position of trust and confidence in which you receive or contribute to the creation of confidential, proprietary and/or government sensitive information, including classified information, relative to the operations of Bestica or its clients. This confidential, proprietary and/or government sensitive information includes, but is not limited to: business, marketing, legal and accounting methods, policies, plans, procedures, strategies and techniques; information concerning Bestica’s earnings and methods for doing business; research and development projects, plans and results; trade secrets (*e.g.*, formulas, methods, processes and specifications) and technical information; trademarks; the names and addresses of Bestica’s employees, suppliers, vendors, clients and potential clients; client lists; pricing, credit and financial information; other government sensitive information (*i.e.*, classified material or HIPPA protected material from client facilities); and any other data or information relating to the business of Bestica which is not generally known by and readily accessible to the public.

You may not use or disclose this confidential, proprietary and/or government sensitive information during your employment with us or after your employment with us has ended, except as necessary in the course of performing your job responsibilities for Bestica and in furtherance of the company’s interests. In particular, all incoming calls or inquiries received concerning the company’s business activities must be referred to the appropriate manager or supervisor. If questions arise regarding materials that are protected or situations where information may be released or utilized, please contact the Compliance Officer.

With regard to classified or unclassified sensitive information, Bestica employees will strictly abide by the applicable laws and regulations.

## Protecting the confidentiality and security of Protected Health Information (PHI) and Personally Identifiable Information (PII)

All Bestica personnel shall conduct themselves in accordance with Bestica policy and all applicable laws and regulations to comply with the principle of maintaining the confidentiality of protected health information and personally identifiable information to which Bestica is given access. Bestica personnel shall comply strictly with all applicable Federal and State laws and regulations regarding the confidentiality of protected health information and personally identifiable information. If questions arise regarding the obligation to maintain the confidentiality on such information, personnel should seek guidance from the Compliance Officer.

## Information About Competitors

To compete in the marketplace, it is necessary to gather competitive information fairly. But some forms of information-gathering can violate the law. At Bestica, we are committed to avoiding illegal and improper information-gathering, so it is important to know what you can and cannot do and what you must be careful about.

Legitimate sources of competitive information include any publicly available information or that which is not subject to contractual or government disclosure restrictions. The following information should never be accepted or used by Bestica employees:

- A competitor's confidential or proprietary information, government sensitive information related to the competitor, or something similar belonging to anyone else.
- Confidential or proprietary information or government sensitive information related to a competitor in any form that new hires have from prior employers (including prior employment with the government).
- Non-public information about a competitor's bid if you are involved in bidding, especially on government contracts.
- Information on a competitor that someone offers to sell.

If you come into possession of any of the above prohibited information, contact the Compliance Officer immediately.

## Ethical Business Practices

Bestica competes for business, but some conduct in the name of competition is not consistent with the law or Bestica's commitment to integrity. Bestica and our employees should never use unfair or illegal practices such as:

- Disparaging or false statements about competitors, their products or their services
- Stealing or misusing competitor's trade secrets
- Inducing employees to break contracts with competitors
- Paying bribes to help Bestica or to hurt a competitor

If you have any questions regarding your activities or the activities of another Bestica employee, contact the Compliance Officer immediately.

## Antitrust

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Bestica is fully committed to compliance with the antitrust laws, which are designed to promote free and open competition in the marketplace. Not only does the customer benefit by getting the best product at the lowest price, but Bestica also benefits by being able to compete on a fair level playing field with competitors. The antitrust laws are complex and must be complied with strictly. Routine business decisions involving prices, terms and conditions of sale, dealings with competitors, and many other matters present problems of great sensitivity. It is therefore essential that every employee be generally aware of the antitrust laws.

The Sherman Act is the primary federal antitrust statute. The Sherman Act prohibits any agreement among competitors to fix prices, rig bids, or engage in other anticompetitive activity. Violation of the Sherman Act is a felony punishable by a fine of up to \$10 million for corporations, and a fine of up to \$350,000 or 3 years imprisonment (or both) for individuals and may subject the Company and/or the individual to suspension or debarment. In addition, collusion among competitors may constitute violations of the mail or wire fraud statute, the false statements statute, or other federal felony statutes. In addition to receiving a criminal sentence, a corporation or individual convicted of a Sherman Act violation may be ordered to make restitution to the victims for all overcharges. Victims of bid-rigging and price-fixing conspiracies also may seek civil recovery of up to three times the amount of damages suffered. Most criminal antitrust prosecutions involve price fixing, bid rigging, or market division or allocation schemes. Under the law, price-fixing and bid-rigging schemes are per se violations of the Sherman Act. This means that where such a collusive scheme has been established, it cannot be justified under the law by arguments or evidence that, for example, the agreed-upon prices were reasonable, the agreement was necessary to prevent or eliminate price-cutting or ruinous competition, or the conspirators were merely trying to make sure that each got a fair share of the market.

### Other business practices

Bestica competes for business, but some conduct in the name of competition is not consistent with the law or Bestica's commitment to integrity. Never compete by using unfair or illegal practices such as:

- Disparaging or false statements about competitors, their products or their services
- Stealing or misusing competitor's trade secrets
- Cutting off a competitor's sources of supply
- Inducing clients to break contracts with competitors
- Paying bribes to help Bestica or to hurt a competitor

If you have any questions regarding your activities or the activities of another Bestica employee, contact the Compliance Officer immediately.

## Accurate and Complete Books, Records and Accounting

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The integrity and completeness of recordkeeping is not only Bestica's policy, it is also mandated by law. Bestica is required to keep books, records, and accounts that fairly reflect the transactions and dispositions of its assets. Proper accounting for all transactions is essential to Bestica's control of its affairs and the accuracy of its financial reporting. To maintain the integrity of the accounting records, all entries in Bestica's books must be prepared carefully and honestly and must be supported by adequate documentation to provide a complete, accurate and auditable record of the transactions they describe. All employees have a responsibility to assure that their work is complete and accurate. No false or misleading entries may be made for any reasons, and no employee may assist another person in making such entries. These policies apply to all recordkeeping of financial records, and client and vendor reporting.

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## Labor and Other Costs

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Bestica employees are responsible for understanding and complying with applicable labor recording policies and procedures. Employees are also responsible for properly accounting for labor, travel, material and other costs, and ensuring that they are accurately recorded and charged to Bestica's records. These costs include, but are not limited to, normal contract work, work related to independent research and development, and bid and proposal activities. Knowingly mischarging the time that you work or falsifying your time keeping violates Bestica policy and the law. No employee shall knowingly charge time or other costs to an incorrect account or cost objective, or knowingly approve such mischarging. Transactions between Bestica and outside individuals and organizations must be promptly and accurately entered in Bestica's books in accordance with generally accepted accounting practices and principles.

Under no circumstances should you misrepresent facts or falsify records. You must promptly report such matters to your supervisor or to the Compliance Officer whenever you believe that labor time or other costs may have been recorded or charged improperly.

## When the Government is Your Client

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Bestica does business with government entities. While integrity is the foundation for all dealings with clients, special rules apply when the government is a client. Violations can result in criminal and civil penalties as well as exclusions from bidding on future government contracts.

Those involved in bidding on or providing service under a government contract need to know these rules:

- Never seek or accept confidential bid information or government sensitive information related to a competitor
- Never give or authorize the giving of any cash payment from Bestica funds to any government official
- Never give or authorize the giving of payments in goods to any government official
- Never offer or provide gifts, gratuities or entertainment to any government official without prior written approval by the Compliance Officer
- Know and follow anti-kickback rules, including restrictions on gifts by those seeking business from the government and from government contractors, including suppliers in the supply chain to such contracts
- Conform strictly to the contract's terms and conditions
- Billings must always be accurate, complete, and in full compliance with all rules and regulations
- Labor hours and other costs, especially when performed under cost-reimbursable, time and materials, and labor-cost type contracts must always be accurate, complete, and in full compliance with all rules and regulations
- Be truthful, accurate, and complete in all invoices, representations and certifications
- Know your government client's specific rules and regulations
- Do not initiate any discussions about employment with any current or former government employee or agency with whom you have had a business relationship without first consulting the Compliance Officer. This includes employment with Bestica or with a government agency.

## False Claims Act

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The False Claims Act prohibits the knowing submission of false or fraudulent claims to the federal government to obtain payment from the federal government or to decrease an obligation owed by the federal government. The False Claims Act also prohibits knowingly making false statements to the federal government to obtain a false or fraudulent claim paid by the federal government or to decrease an obligation owed to the federal government. Ensure that all statements made to government officials are accurate and to the best of your knowledge.

## Mandatory Disclosure

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The Federal Acquisition Regulation (FAR) mandates that Bestica timely disclose, in writing, to the agency Office of the Inspector General (OIG), with a copy to the Contracting Officer, whenever, in connection with the award, performance, or closeout of a Government contract or any subcontract thereunder, Bestica has credible evidence that a principal, employee, agent, or subcontractor of Bestica has committed either:

- A violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code; or
- A violation of the civil False Claims Act.

If the violation relates to an order against a Government-wide acquisition contract, a multi-agency contract, a multiple award schedule contract such as the Federal Supply Schedule, or any other procurement instrument intended for use by multiple agencies, Bestica must notify the OIG of the ordering agency and the Inspector General of the agency responsible for the basic contract.

Bestica may be suspended and/or debarred for a knowing failure by a principal to timely disclose to the Government, in connection with the award, performance, or closeout of a Government contract performed by Bestica or a subcontract awarded thereunder, credible evidence of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code or a violation of the civil False Claims Act. Bestica may also be suspended and/or debarred for a knowing failure by a principal to timely disclose to the Contracting Officer credible evidence of a significant overpayment, other than overpayments resulting from contract financing payments as defined in FAR 32.001.

If you have any questions relating to these requirements seek the guidance of the Compliance Officer. If you believe one of the various offenses detailed in this subsection have occurred, this Code of Conduct requires you to report the matter to the Compliance Officer and cooperate with any subsequent action taken.

## Gifts, Meals and Entertainment

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Bestica's business depends on creating productive successful relationships with vendors and clients. These relationships must be based on sound, fair business decisions.

Bestica employees, nor any member of their families, may not offer to, solicit from, or accept from a supplier or customer, any gift or money that could be reasonably construed to be given to influence or give the appearance to influence the recipient. You should question any gift offered or given outside of the guidelines listed below and seek written approval from the Compliance Officer before acting.

The following guidelines apply for gifts, entertainment and travel offered by Bestica employees to suppliers and clients or offered to Bestica employees from suppliers and clients. These guidelines

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recognize that modest, sensible gifts can be part of the normal course of doing business with other people.

Bestica employees may provide clients, or accept from clients or suppliers, certain promotional “premiums” (such as t-shirts, coffee mugs, pens or key chains) imprinted with the Company logo or sales information. Bestica employees may also offer clients, or accept from clients or suppliers, modest items of food, greeting cards or items with little intrinsic value (*i.e.*, coffee, donuts, and certificates). No gift outside of these guidelines may be offered, given or accepted without prior written approval by the Compliance Officer.

There are clear and generally obvious forms of gifts, entertainment and travel that are NEVER allowed and constitute a clear violation of the Code of Conduct. These include:

- Cash (including chips for gambling), loans, stock, or stock options
- Any item which is provided in direct exchange (*i.e.*, quid pro quo) for a reciprocal action
- Any item that is illegal, sexually explicit, or would violate Bestica’s commitment of respect towards all those the company deals with
- Any item offered during the process of a competitive bid or contract negotiation with a vendor or client
- Any entertainment or travel or lavish gifts (*e.g.* airlines tickets, event tickets, club memberships, expensive jewelry, a computer system, etc.)

## Environmental Compliance

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Bestica is committed to full compliance with all applicable federal, state and local environmental laws, standards, and guidelines. Not only is environmental compliance legally necessary, but it is also an important component of Bestica’s obligation to the community and good reputation. It is essential that each employee involved with regulated air emissions, water discharges, hazardous materials, or other regulated pollutants know and comply with all applicable environmental laws and guidelines. No one at Bestica may participate in concealing an improper discharge, disposal, or storage of hazardous materials or other pollutants. Any person who has reason to believe that there may have been violations of any aspect of Bestica’s environmental compliance policy shall report immediately to the Bestica’s environmental compliance officer or Compliance Officer.

## Compliance with Laws, Rules and Regulations

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All employees must respect and obey the local, state and federal laws, rules and regulations applicable to Bestica. Although not all employees are expected to know the details of these requirements, it is important to know enough to determine when to seek advice from supervisors, managers or the Compliance Officer.

If an employee is unsure of what laws, rules and regulations are applicable to their work with Bestica, they should consult their supervisor or manager, or the Compliance Officer.