

GREENFIELD RESEARCH, INC.  
CODE OF CONDUCT AND ETHICS POLICY  
EFFECTIVE SEPTEMBER 2017

*Integrity: the quality of being honest and having strong moral principles*

*Code of Conduct: a set of rules outlining the social norms and rules and responsibilities of, or proper practices for, an individual, party or organization.*

We are all responsible for protecting our culture of Integrity. A potential violation is a serious matter. If you see something or are unsure if something potentially violates the Ethics Policy, speak up. We expect everyone to let us know about any suspected violation of our Ethics Policy. We do not tolerate retaliation against anyone for raising good faith concerns.

If you have a question about the Ethics Policy or you are concerned about a potential violation of the Ethics Policy, you can:

1. Discuss the issue with your supervisor
2. Discuss the issue with another supervisor or manager
3. Contact Human Resources department

Greenfield Research, Inc. does not tolerate retaliation for asking questions or raising good faith concerns of possible violations. Your concerns are taken very seriously. We will investigate reports of possible violations. All employees are expected to fully cooperate with investigations. Violations of the Ethics Policy are subject to disciplinary action up to and including termination.

The Ethics Policy applies equally to everyone at Greenfield Research, Inc. – Company officers, employees, agents, and contract workers. Employees are expected to follow the Ethics Policy and assist fellow employees in understanding and complying with the Policy. Supervisors will help make their employees aware of the Ethics Policy’s importance and requirements, help implement programs and procedures to promote integrity. Supervisors are responsible for helping employees comply with the Ethics Policy’s requirements and its spirit.

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The Ethics Policy includes our commitment to providing safe and quality products and services. You should immediately contact the quality department or your supervisor if you believe there is any deficiency in product design, or maintenance that threatens anyone’s health or safety. Or anything that may harm the quality of our products or services or anything that may harm Greenfield Research, Inc.’s reputation.

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Sharing the Company’s confidential information is not allowed. It is your duty to respect confidential information about Greenfield Research, Inc.’s products, activities, performance and plans. Disclose confidential information only on a “need-to-know” basis, even with other Greenfield Research, Inc. employees. Secure confidential information where others cannot see when you are not reviewing it. We compete fairly and honestly. Do not use illegal or unethical means to learn a competitor’s confidential information. Protect all of Greenfield Research, Inc.’s confidential information even after you stop working with Greenfield Research, Inc.

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You may not give or receive anything of monetary value to influence business judgement unduly, or use Greenfield Research, Inc.'s information, property or authority for personal gain. Remember to promote Greenfield Research's best interest when making business decisions. Do not seek or receive personal economic gain, beyond your normal company pay, for being a Greenfield Research, Inc. officer, employee or contract worker. Disclose to your supervisor any situation in which your family, friends or business associates might profit based on your relationship with Greenfield Research, Inc. Report financial interests you and your family have in entities that do business with Greenfield Research, Inc. Do not pursue any business opportunity you discover through your association with Greenfield Research, Inc. for personal gain or the gain of any entity other than Greenfield Research, Inc. Do not work for a customer, supplier or competitor of Greenfield Research, Inc. while Greenfield Research, Inc. employs you. Think about how it will appear if you accept gifts or entertainment from suppliers or customers doing business with Greenfield Research, Inc. You may accept business gifts of minimal value. You may not directly or indirectly offer, promise or accept gifts as a condition or result of doing business with Greenfield Research, Inc.

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Use assets such as Company vehicles properly and legally, for business purposes, and for authorized personal use.

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Greenfield Research, Inc. is committed to providing safe, quality products and services. You should contact quality management personnel or your supervisor if you believe there is:

- Any deficiency in product design, installation, or maintenance that threatens anyone's health or safety
  - Anything that may harm the quality of our products or services
  - Anything that may harm Greenfield Research, Inc.'s reputation
  - Anything that may harm Greenfield Research, Inc.'s financial interests
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Greenfield Research, Inc. does not tolerate, and we actively oppose, corruption in our business. We do not tolerate bribery of individuals. We neither provide nor receive lavish or extravagant gifts. We:

- Do not offer, pay, give, or promise any favor, service, entertainment, meal, gift or other thing of value to any customer to get business, or to political officials or their family members to get preferential treatment for Greenfield Research, Inc.
  - Do not offer employment, benefits or other profitable opportunities to officials or private citizens who can provide Greenfield Research, Inc. with an economic advantage.
  - Obey all local anti-corruption and bribery laws
  - Accurately record all of your transactions including your expenses and any gifts or entertainment you provide.
  - Do not associate with business partners who engage in corrupt practices.
  - Do not tolerate retaliation for asking questions or raising good-faith concerns about a possible violation of this principal.
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Greenfield Research, Inc. keeps accurate and trustworthy books, accounts and records. Remember:

- Company books and records must be complete, accurate and reliable, following generally accepted accounting principles.
- Be precise and complete when you record transactions.
- Do not make false or misleading entries, or omit or conceal required information such as payment amount or its actual purpose
- Follow laws, regulations industry standards and Company policies when you produce, store or destroy records and documents.

- Do not keep hidden or unrecorded funds, accounts or assets.
- Maintain supporting documentation required by relevant policies.
- Anyone who falsifies, hides or manipulates records faces disciplinary action, termination and personal liability.
- If you find errors, or cannot reconcile an account, notify management so the account can be corrected.
- Follow the law and Greenfield Research, Inc. policies on document and record retention, follow procedures when destroying records or documents.

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Greenfield Research, Inc. complies with international trade laws. We follow the trade laws of all countries where Greenfield Research, Inc. conducts business concerning:

- Product labeling
- Keeping accurate records of all international transactions
- Following Greenfield Research, Inc. policies and processes when selling and shipping products to other countries or when importing anything.
- Make efforts to ensure customers, business partners, vendors, service providers, agents, consultants and distributors follow Greenfield Research, Inc. policies and procedures.
- Engage companies and business partners who agree to obey international trade laws.

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Greenfield Research, Inc. limits the use of Company resources to support political campaigns or causes. We generally do not get involved in political campaigns or political issues. We currently never offer contributions, payments or anything of value from Greenfield Research, Inc. to government employees, officials, or political candidates with the intent to influence them or gain an improper advantage for the Company.

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Greenfield Research, Inc. communicates truthfully with the public. In order to be sure our communications are truthful and accurate:

- Do not speak to the media unless you have been specifically authorized to do so.
- Take care when discussing Greenfield Research, Inc. outside the company – in public places and with friends and family, on the Internet, in public forums, blogs and social networking sites
- Never disclose private company information without prior and proper authorization
- Neither say nor imply that you represent the Company unless you're actually authorized to do so.
- Only those expressly authorized by Greenfield Research, Inc. may speak on behalf of Greenfield Research, Inc.
- If you are authorized by Greenfield Research, Inc. to speak on the Company's behalf, you must provide accurate information and avoid speculating.

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To make an ethical decision, ask yourself these questions:

1. *Is the action or decision consistent with the letter and spirit of the Ethics Policy?*
2. *Is it legal?*
3. *What would others think of my decisions or actions?*
4. *How would I feel if my actions appeared in the news media, on television or on the Internet?*

