



Integrated Security Solutions, Inc.’s Code of Business Ethics and Conduct

COMMITMENT

Integrated Security Solutions, Inc. (ISS) is committed to conducting ethical business practices in accordance with the highest standards of principled business conduct, and in accordance with ISS’s Contractor Code of Business Ethics and Conduct. ISS’s Code of Business Conduct establishes and affirms that ISS employees (‘ISS employees’ includes its acting owner(s), members, representatives, associates) understand these requirements and the expectations that are involved in any aspect of ISS’s business functions and practices with its customers, consisting of individual commercial businesses, federal government agencies, departments of State and local governments.

This Code of Business Conduct addresses rules and requirements that focus on activities associated with engaging and performing all business matters with ISS’s customers. ISS employees are responsible for seeking advice when needed, raising concerns, and reporting any potential or factual violations of ISS’s Code of Business Conduct to its Human Resources Management. ISS’s employees are directed to ask for help, when in doubt.

RAISING CONCERNS AND REPORTING MISCONDUCT

The ISS Code of Business Conduct requires ISS employees to raise concerns and report misconduct for any possible violations of the Code or its underlying policies, as well as violations of laws and regulations. This duty to report applies to all business matters and work performance by all ISS’s employees. In addition to these reporting obligations, it is imperative to report any suspicion or knowledge that there has been an act of misconduct, an ethical violation, a violation of Federal Criminal Law involving fraud, conflict of interest, bribery, or gratuities, or a violation of the Civil False Claims Act. It is the employee’s responsibility to bring the suspected act or acts to the attention of ISS’s Human Resources Management for ISS to take the appropriate steps to report the conduct to appropriate authorities. The ability to report concerns to the executive designate, in confidence is available by an ISS designated Hotline via telephone number **406-755-2506**.

If an ISS employee fails to report these types of violations or suspected violations, the employee is subject to discipline for nondisclosure, up to and including termination of employment.

VIOLATIONS AND THEIR CONSEQUENCES

Any ISS employee who violates the policies in the ISS Code of Business Conduct, including the reporting requirements, may be subject to disciplinary action, up to and including termination of employment. The specific type of disciplinary action will be based on specific circumstances and severity of each case and will be consistent with local regulations and any governing labor agreements.

NO RETALIATION

ISS’s policy is to encourage reporting of all misconduct. ISS prohibits retaliation against anyone who, in good faith, reports a concern or participates in an investigation, even if the allegation ultimately is not substantiated.

Any employee, regardless of position, found to have engaged in retaliatory conduct against another individual who has raised a business conduct concern in good faith, will be subject to disciplinary action, up to and including termination of employment. If an employee feels they have been subjected to retaliation, it is requested to promptly contact the Hotline for assistance. It must be understood that the ISS policy against retaliation does not exempt this employee from discipline if this employee has engaged in improper conduct.

ORGANIZATIONAL CONFLICTS OF INTEREST

It is prohibited for ISS employees from serving in conflicting roles that might bias their judgment, create an unfair competitive advantage, or impair objectivity including within their performance. In addition to these requirements and prohibitions, all ISS employees are directed to recognize and avoid any organizational conflicts of interest.

BRIBES AND KICKBACKS

It is expressly prohibited for ISS employees to offer or accept bribes or kickbacks from any customer, third party or associated patron form of business entity.

RECORDS MANAGEMENT

ISS employees shall retain all corporate, business and personnel records securely for the required statutory and/or regulatory period.

REQUIRED TRAINING / INTERNAL CONTROLS

ISS provides its Code of Business Conduct including periodic awareness training to all ISS employees with respect to the protocol responsibilities of this policy. and that the information effectively reaches all ISS employees. ISS periodically reviews these internal controls.

CONTACT INFORMATION

HOTLINE: 406-755-2506

www.MTISS.com

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