

COMMITMENT TO ETHICAL BUSINESS CONDUCT

Energy Systems Group, LLC and its affiliates, PacificWest Energy Solutions, Inc. and Yearout Energy Services Company, LLC (hereafter “ESG”) and our employees are committed to the ethical conduct of our business. We expect the businesses that provide us with needed materials, supplies or services, to share our commitment to ethical business conduct. We respectfully ask that when conducting business with ESG, you help us meet our commitment to ethical conduct and familiarize the expectations that we set for ourselves.

The policies listed below are from our Corporate Code of Conduct.

- We do not accept items of value that could create a conflict of interest or the appearance of one. This policy is not intended to prohibit normal and customary business meals, gifts or entertainment so long as they are not extravagant and have legitimate business purposes.
- We avoid substantial financial interests in the companies with which we do business. We define a substantial interest as an investment of either \$25,000 or 5% (regardless of amount) of the ownership.
- We appreciate and serve our communities. We work to ensure that our customers and communities can trust the safety and reliability of the products we install and the services we provide.
- We value our good working relationships with government officials at all levels: local, state, and federal. We comply with the following basic guidelines:
 - We do not improperly influence government officials.
 - Any gifts, favors, entertainment or meals provided to a government employee must be approved and accompanied by an invoice detailing the fair market value of any good or service we provide.
 - We accurately record and charge costs to government contracts in accordance with the terms of particular contracts and maintain good records.
 - We strictly follow government requirements regarding classified and/or confidential information.

We request that you provide a copy of this letter to the individuals in your company who deal with our employees. Should you wish to express any concern, or if you become aware of any violation of the policies mentioned above or any other unethical conduct involving an ESG employee, please report it by contacting us directly at 812-471-5000 or through email at esg@energysystemsgroup.com.

We look forward to building a solid business relationship with you. Thank you in advance for your cooperation and support of our approach to ethical business conduct.