



Mirachem, LLC

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Mirachem Employee Handbook

M-1020.1.1 Code of Business Conduct and Ethics

Revised: 15-MAR-2020 Mirachem.com/ETHICS

THIS POLICY CONTAINS IMPORTANT INFORMATION REGARDING MIRACHEM'S COMMITMENT TO THE RESPONSIBLE GOVERNANCE OF THE COMPANY AND CONDUCT OF THE COMPANY'S BUSINESS. Printed versions of this document may not reflect the most current information. The most current revisions may always be found online at Mirachem.com/ethics. Additional information may be obtained by contacting the CEO of the business unit or visiting Heritage-Crystal Clean's Corporate Governance webpage at <https://www.crystal-clean.com/corporate-governance/>.

A. PURPOSE OF POLICY

Mirachem, LLC ("Mirachem") has adopted this Code of Business Conduct and Ethics ("Code") as a supplement to the Heritage-Crystal Clean ("HCC") Code of Business Conduct and Ethics to set forth additional principles and guidelines to direct Mirachem personnel in the proper conduct of their affairs as representatives of Mirachem. This Code describes the standard of ethical business conduct expected from all Mirachem employees and contractors.

B. MIRACHEM, AN HCC COMPANY

Mirachem, LLC is a US-based Heritage-Crystal Clean Company and part of a publicly held enterprise. All policies and actions of the Company are required to be consistent with HCC policies applicable to HCC business units. Should a conflict between any provision of this Code and an applicable HCC policy be discovered, Mirachem's Senior Management Team is responsible for resolving the conflict with applicable HCC personnel and taking whatever corrective action may be necessary.

C. RESPONSIBLE MANAGER

The responsibility for developing, managing, monitoring and reviewing this Code, and all Company activities deriving from it, shall rest with the CEO of the business unit in consultation with the Mirachem's Senior Management Team.

D. COMPLIANCE SUPERVISOR

Mirachem's Senior Management Team may create necessary training and certification processes to designate employees or contractors as a Compliance Supervisor. Compliance Supervisors may be delegated to perform day-to-day monitoring, reporting, training, or advisory functions as deemed necessary or advisable to implement and manage this Code.

E. POLICY STATEMENT

It is Mirachem's policy to operate its business according to the principles of good business ethics and social responsibility. Mirachem promotes the following standards of behavior in the conduct of our business and requires that all Mirachem employees and representatives conform to these standards:

1. Compliance with the HCC Code Of Business Conduct And Ethics ("HCC Code") which can be found online by visiting Heritage-Crystal Clean's Corporate Governance webpage at <https://www.crystal-clean.com/corporate-governance/>.
2. Following both the letter and spirit of the law
3. Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest
4. Avoidance of conflicts of interest, including disclosure of any material transaction or relationship that reasonably could be expected to give rise to such a conflict
5. Full, fair, accurate, timely, and understandable disclosure in reports and documents that we file with HCC and in our other public communications
6. Compliance with applicable governmental laws, rules, and regulations
7. Ensuring that the Company's legitimate business interests, opportunities, assets, confidential information and other Commercial Purposes are always protected
8. Prompt internal reporting of violations of the Code
9. Deterrence of wrongdoing
10. Accountability for adherence to the Code

Mirachem consults a variety of external resources to inform and guide the evolution of this code. These sources include:

- The Responsible Business Alliance (formerly the Electronic Industry Citizenship Coalition)
- GoodCorporation Business Ethics Standard
- ISO 26000 Corporate Social Responsibility standards
- US Environmental Protection Agency
- United Nations Global Compact
- Asia-Pacific Economic Cooperation (APEC) Codes of Conduct
- Guiding Principles Resolution 17/4 of 16-Jun-2011 of the UN Human rights Council

F. SCOPE OF CODE

This Code applies to all Mirachem operations, employees and properties, as well as the operations, employees and properties of others who are contracted to provide services to Mirachem. All persons and operations covered by this Code are expected to be familiar with the terms and conditions contained herein. Conformance with this Code is a requirement of employment and/or contractual relationship with Mirachem, and violation of any provision of this Code may be grounds for disciplinary or other adverse action, up to including termination of employment or contract.

This Code does not provide detailed descriptions of all Company policies, nor does it limit or restrict the applicability of any other policy, unless specifically indicated herein.

G. REVISIONS

This code shall be reviewed on an annual basis by the Mirachem's Senior Management Team. It shall be revised as necessary to conform to the HCC Code, as directed by the Heritage-Crystal Clean management team, or as deemed necessary or advisable by Mirachem's Senior Management Team.

H. OTHER POLICIES OR AGREEMENTS

Mirachem maintains other policies and is party to other agreements which may touch upon topics discussed in this code. No such other policy or agreement shall contain any provision contrary to the purpose and principles of this Code, nor shall any employee or contractor be compelled or incited by any other policy or agreement to engage in conduct contrary to this Code. Any offending provision or section of such other policy or agreement shall be nullified by this Code and shall be unenforceable and of no effect.

This Code is not intended to, nor should be construed as to, revise, diminish or otherwise alter any provision of such other policy or agreement that confirms to the purpose and principles contained herein. While this Code is a statement of guiding principle, specific terms and conditions of its implementation are left to other management tools.

I. AVOIDNACE OF CONFLICTING POLICIES OR COMMITMENTS

This Code is a "top level" governance document of Mirachem, LLC. Significant care should be taken by all Mirachem employees and contractors to avoid the adoption, ratification, or execution of any policy or agreement that could potentially create conflict with or confusion about this Code. In the interests of avoiding such actual or perceived conflict or confusion, this Code shall prohibit the Company from adopting or accepting any other agreement, policy, or standard that is positioned to be, or might reasonably be construed to be, an ethics policy or other governing document describing Mirachem's principles on ensuring integrity in our governance practices. This Code shall also prohibit the Company from making other certifications or representations regarding areas covered by the Code, unless the substance of such certifications or representations is appropriately affirmed by the Code.

J. THIRD PARTY OR CUSTOMER-SPECIFIC CERTIFICATIONS; GENERAL POLICIES OR REPRESENTATIONS

Mirachem conducts business across a wide variety of industries and its products are used in many applications requiring conformity to a vast array of internal and external standards and specifications. It is common for Mirachem to be asked to certify compliance with a third-party industry standard or customer policy as part of our daily operations. Given the many business conduct standards and company-specific policies that exist, it would be irresponsible for Mirachem to represent that it could achieve ongoing compliance without conflict for each of them. For this reason, this Code prohibits any Mirachem employee or contractor to certify, represent, authorize, or agree to any general policy statement or execute any general document to this effect. This includes general purchasing terms and conditions, supplier qualification forms, vendor certification requests, or flow-down standards requirements.

Mirachem and its representatives may only authorize, accept, or execute such general certifications or agreements when they meet all the following criteria:

1. Does not conflict with this Code or any other Mirachem policy.
2. Contain only provisions or standards to which Mirachem has already represented acceptance.
3. Discuss only reasonable and customary Customer Requirements or vendor procedures necessary for efficient transaction processing and reasonable billing and collection practices.
4. Do not contain terms or conditions that are not applicable to the products or support that Mirachem provides.
5. Does not attempt to transfer legal obligation or liability to Mirachem for any situation or circumstance that is not within the reasonable scope and control of the company.

Any party that wishes to obtain Mirachem's agreement to any policy or representation that does not meet these criteria should prepare a specific document for negotiation, review, and approval according to Mirachem's contract management procedures.

To provide reasonable and appropriate assurances to customers and other interested parties, Mirachem represents that others may rely on this Code as evidence of Mirachem's commitment to responsible business practices and evidence of our day-to-day implementation of robust policies and procedures to ensure the ethical governance, social responsibility, and quality management of our Company.

K. AREAS OF CONCERN IN ETHICAL GOVERNANCE

The ethical governance of companies and ensuring the integrity of business transactions is an increasingly significant area of concern in today's world. These areas of concern tend to center on certain function within companies and Mirachem understands that customers and other interested parties have a right to understand Mirachem's policies and practices in these areas. To provide clarity and transparency concerning Mirachem's policies and practices in these areas, the following guidelines have been established as part of this Code:

1. HCC CODE

The HCC Code contains provisions concerning the following topics:

- a. Conflicts of Interests
- b. Outside Employment
- c. Gifts and Entertainment
- d. Financial Interest in Other Business
- e. Bribery or Money Laundering
- f. Confidential Information and Intellectual Property
- g. Antitrust Compliance
- h. Financial Integrity and Company Records
- i. Securities Law Disclosures and Public Communications/Trading in Company Stock
- j. Violations of the HCC Code
- k. Waivers of The HCC Code and Disclosure

2. ENVIRONMENTAL RESPONSIBILITY AND WORKER SAFETY

One of Mirachem's core beliefs is our commitment to manufacture and market safer products in the industrial workspace. This commitment extends to our own facilities and employees.

Safety is also a cornerstone value for all Heritage-Crystal Clean operations. Mirachem is answerable to HCC's corporate Environmental, Health & Safety Department, which requires that Mirachem provide ongoing safety and awareness training, utilize best practices in preventing, documenting and analyzing risks in our workplaces, ensuring employee access to proper safety and protective equipment, and proper reporting and follow up on all safety incidents and opportunities for improvement.

Mirachem is also dedicated to the principles of environmental safety. The Company maintains strict policies concerning the types of materials that may be brought onto company property, works with third-party experts to monitor our compliance with environmental regulatory and reporting laws, and regularly trains staff to evaluate and minimize risk to the environment.

3. WORKING HOURS, WAGES, BENEFITS, AN EQUAL EMPLOYMENT OPPORTUNITY

Heritage-Crystal Clean maintains a corporate Human Resources Department that has overnight responsibility on related functions throughout the Company, including Mirachem. Job Descriptions are prepared in conjunction with dedicated Human Resource professionals, and recruiting, hiring and termination processes are coordinated through the HR Department. HR policies and practices, including work schedule, time off, wage payments, benefits, promotions, and disciplinary action are standardized by and implemented through the corporate HR department.

It is Mirachem's policy to provide equal employment opportunities without regard to race, color, religion, sex, national origin, age, disability, marital status, veteran status, sexual orientation, genetic information or any other protected characteristic under applicable law. This policy relates to all phases of employment, including, but not limited to, recruiting, employment, placement, promotion, transfer, demotion, reduction of workforce and termination, rates of pay or other forms of compensation, selection for training, the use of all facilities, and participation in all company-sponsored employee activities. Provisions in applicable laws providing for bona fide occupational qualifications, business necessity, or age limitations will be adhered to by the company where appropriate.

As part of the company's equal employment opportunity policy the Company will also take affirmative action as called for by applicable laws and Executive Orders to ensure that minority group individuals, females, disabled veterans, recently separated veterans, other protected veterans, Armed Forces service medal veterans, and qualified disabled persons are introduced into our workforce and considered for promotional opportunities.

Employees and applicants shall not be subjected to harassment, intimidation or any type of retaliation because they have (1) filed a complaint; (2) assisted or participated in an investigation, compliance review, hearing or any other activity related to the administration of any federal, state or local law requiring equal employment opportunity; (3) opposed any act or practice made unlawful by any federal, state or local law requiring equal opportunity; or (4) exercised any other legal right protected by federal, state or local law requiring equal opportunity.

These policies are periodically reviewed by supervisors and shall be appropriately administered by the management team. It is the responsibility of each supervisor of the company to ensure affirmative implementation of these policies to avoid any discrimination in employment. All employees are expected to recognize these policies and cooperate with their implementation. Violation of these policies is a disciplinary offense.

4. FORCED, COERCED, OR UNDERAGE LABOR

This Code requires that Mirachem policies and practices conform to all applicable labor laws and HCC standards concerning the legal and ethical sourcing, hiring, employing, and compensating of employees. All candidates and employees shall be free from any form of force or coercion in the hiring process or during their term of employment. Mirachem does not employ or utilize labor from children under the age of 15 years of age, unless such children are part of a recognized educational program under the supervision of a duly accredited education professional employed by a credentialed institution. Children under 18 years of age may be employed under the strict protections afforded to child workers by applicable law. Mirachem requires its vendors and suppliers to provide similar assurances as a condition of doing business with the company.

5. ANTI-SLAVERY AND HUMAN TRAFFICKING

Mirachem is committed to improving our operations to prevent our unknowing participation in human rights violations. We support the objectives of the California Supply Chains Act of 2010 and Federal Acquisition Regulations 52-222-50 - Combating Trafficking in Persons. Mirachem has implemented a program to ensure that vendors make adequate representations concerning their efforts to combat human trafficking and, for key and large volume suppliers, to provide a FAR 52.222-56-compliant certification.

6. WORKPLACE STANDARDS

All persons employed by Mirachem or visiting Company facilities shall have the right to be in a safe, secure, and harassment and discrimination-free environment. This Code requires that the Company comply with all laws and HCC standards ensuring a safe and secure workplace and take all necessary steps to prevent unlawful

discrimination and all forms of sexual, verbal, emotional, or physical harassment or intimidation. Mirachem requires its vendors and suppliers to provide similar assurances as a condition of doing business with the Company.

7. CONFLICT MINERALS

Audits of Mirachem's product supply chain have failed to identify any material that is commonly, or likely to be, utilized in the conflict mineral trade. In support of the worldwide effort to prevent trafficking in these materials and comply with the provisions of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, This Code requires that Mirachem conduct an annual review of its materials inventory and mandates that its suppliers make affirmative representations concerning their efforts to combat this illegal trade.

8. PRIVACY

Mirachem respects the principles of personal and organizational privacy. As a general statement, this Code prohibits the Company from selling or otherwise transmitting personal or organizational data to an external party except as may be necessary to comply with an applicable law or regulation, complete an order or other authorized business transaction, provide necessary data to a contractor, or provide some other form of product or technical support.

As a Heritage-Crystal Clean company and part of a publicly held enterprise, Mirachem has an obligation to provide financial and other potentially sensitive customer data as part of its required reporting. Any such information is subject to the requirements of the HCC Code Of Business Conduct And Ethics and HCC's policies governing confidential information.

Mirachem is committed to the principles highlighted in the European Union's General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA). This Code shall require all employees and contractors to exercise due care and diligence when handling private information. The Company's Privacy Policy ([Mirachem.com/privacy](https://mirachem.com/privacy)) provides information on how Mirachem collects, stores, uses, and protects private information.

9. POLICIES ON GIFTS, MEAL, ENTERTAINMENT, AND ANTI-CORRUPTION

Mirachem maintains and enforces internal policies concerning gifts and the avoidance of official corruption in its dealings. All employees and contractors are also required to respect the policies of our customers and other business contacts in these areas.

10. ACCOUNTING AND FINANCIAL PRACTICES CONTROLS

As part of a publicly held enterprise, Mirachem is subject to the Sarbanes-Oxley Act of 2002 (SOX) and operates under its requirements for appropriate financial controls and company governance. Mirachem's financial reports, governance practices, management actions, and accounting control are monitored by the Heritage-Crystal Clean management team and reviewed by HCC's internal auditing department. Business results are reported to the public and the SEC via HCC's reporting.

Mirachem's accounting system follows Generally Accepted Accounting Principles (GAAP) and has been in continuous operation since 31-Dec-2012.

Mirachem does not generally conduct "cost plus" sales transactions. Products are typically offered at a firm, fixed price on a quote-to-order basis, according to either a published price list, a negotiated pricing agreement, or a standard price calculation matrix for qualified purchases. Price discount structures are based on volume purchases.

Revenue and costs are recorded under general ledger control, with overhead and production costs segregated. However, job-specific cost accounting is not generally performed.

11. EMPLOYEE CONFIDENTIALITY AGREEMENTS

This code shall prohibit the Company from requiring or enforcing any internal confidentiality or non-disclosure agreement prohibiting or otherwise restricting a party from lawfully reporting waste, fraud, or abuse related to the performance of a US Federal, State, or local government contract to a duly appointed law enforcement officer or authorized investigative agent.

L. QUALITY MANAGEMENT

As an ISO 9001:2015 certified organization, Mirachem embraces the principles of Quality Management and Continuous Improvement. Mirachem's Quality Management System (QMS) ensures that the Company operates according to accepted standards of training, product quality, and customer satisfaction, and performs appropriate management due diligence to document and audit key processes, capture and review relevant data, conduct effective risk analyses benefiting all interested parties, and ensure timely and effective action to mitigate problems and make improvements.

M. BUSINESS CONTINUITY

In order to meet its obligations to customers, employees, and other interested parties, Mirachem has developed a formal Business Continuity Plan (BCP). This plan is integrated with our QMS and other key policies and procedures. Mirachem's BCP contains provisions to guide it through many types of business disruptions, including:

- Loss or damage of our manufacturing or support facilities
- Natural disasters
- Criminal activity or terrorist events
- Pandemics
- Supply chain disruption

The Business Continuity Plan is periodically reviewed and audited as part of routine management operations.

N. DEPARTMENT OF HOMELAND SECURITY REGULATION

Mirachem is regulated by the US Department of Homeland Security (DHS) and is dedicated to its responsibility to promote domestic security and effectively prepare our business for emergency or disaster situations. As part of our regulatory compliance efforts, Mirachem has implemented policies and procedures based on established Risk Based Performance Standards (RBPS) that include the following areas of concern:

1. Intrusion prevention, detection and response
2. Personnel surety, including worker identity and employment eligibility screening
3. Information security
4. Protection of critical infrastructure and control systems
5. Business continuity planning
6. Emergency and disaster planning and response

Mirachem has a statutory obligation to comply with regulations set forth by the DHS, and plans and procedures covering regulated areas are subject to review and approval by the Department. To ensure that Mirachem complies with its obligations in this area, this Code prohibits the adoption of any procedure or standard that covers topics substantially similar to those regulated by DHS and forbids the making of any representations or certifications concerning compliance with any standard not covered by Mirachem's approved plans and procedures.

Pursuant to Presidential Policy Directive 21 (PPD-21): Critical Infrastructure Security and Resilience, a measure intended to advance a national policy to strengthen and maintain secure, functioning, and resilient critical infrastructure, Mirachem's operations are categorized as essential by the DHS Cybersecurity and Infrastructure Security Agency. Mirachem takes seriously its role as part of the nation's critical infrastructure and is operated and managed to ensure an ongoing ability to meet this responsibility.

O. US GOVERNMENT CONTRACTOR REGISTRATION

Mirachem is registered with the US government's System for Award Management ("SAM"), a Federal database used for screening and qualifying organizations to do business with government agencies. As part of the registration and qualification process, under penalty of criminal prosecution per Title 18 of the United States Code or civil liability under the False Claims Act, Mirachem makes certain certifications and representations concerning regulatory compliance in the following areas:

1. Federal Acquisition Regulations (FAR)
2. Defense Federal Acquisition Regulation Supplement (DFARS)
3. US Small Business Administration classifications
4. Disqualified persons / entities

5. Foreign Corrupt Practices Act (FCPA), U.S.C. §§78dd-1, et seq
6. NAICS and CAGE codes assigned

This registration is a matter of public record. A current list of Mirachem's certifications and representations may be found online at <https://sam.gov>.

P. MANAGEMENT ACCOUNTABILITY AND RESPONSIBILITY

As part of a publicly held enterprise, Heritage-Crystal Clean, Inc. (HCCI), Mirachem is managed and operated in compliance with the Sarbanes-Oxley Act of 2002 (Public Law 107-204, 116 Stat. 745), commonly known as SOX. Mirachem has implemented policies and procedures to ensure SOX compliance, primarily in the areas of:

1. Integrity of financial reporting
2. Record creation, retention and destruction
3. Company responsibility
4. Conflicts of interest
5. Fraud prevention and accountability
6. Financial controls
7. Authority and reporting
8. Business continuity planning
9. Emergency and disaster planning and response

Mirachem's policies and procedures on SOX-related matters are routinely audited by Heritage-Crystal Clean compliance specialists. The results of these audits and corresponding compliance representations are incorporated in HCCI's routine reporting to relevant parties.

Q. INFORMATION SECURITY

This Code mandates that the Company develop and implement policies and procedures to protect sensitive information. Areas addressed by these policies and procedures include:

1. Senior management involvement
2. Policy of least access
3. User creation, maintenance, deletion and auditing
4. Credential management
5. Intrusion prevention, detection, and response
6. Information systems maintenance and management
7. User awareness and training; establishment of best practices
8. Regulatory and contracts compliance

In 2018, Mirachem adopted the NIST Cybersecurity Framework as its master plan for implementing, maintaining, and evolving its cybersecurity efforts. Mirachem's cybersecurity program is integrated with its DHS regulatory compliance plan and is based on the NIST-800-171 standard.

As of October 2019, Mirachem has launched a program to comply with the provisions of 48 CFR § 252.204-7012 - Safeguarding covered defense information and cyber incident reporting (DFARS 252.204-7012) and obtain Cybersecurity Maturity Model Certification (CMMS) as required of US Department of Defense contractors. Subject to the evolution of the CMMC standards and certification process, this program is scheduled to be complete by December 31, 2020.

R. AUDITING AND COMPLIANCE

Mirachem's policies and procedures undergo a variety of internal, external and regulatory audits and reviews to identify strengths, weaknesses, non-conformities, or opportunities for improvements in areas covered by this Code. These include:

1. Periodic management reviews and internal audits as required by Mirachem's Quality Management System.
2. External surveillance and recertification audits performed as part of Mirachem's ISO 9001:2015 certification.
3. Periodic audits for HCC policy and SOX compliance conducted by HCC's internal auditing department.
4. Upstream external audits of HCC aggregated information provided to investors, regulators and other interested parties.

5. Safety and security reviews and audits conducted by Mirachem's management team in accordance with Company policy.
6. DHS safety and security inspections.
7. Annual re-certification of US government contractor representations.
8. Internal audits and certifications on information systems and information security controls.

S. CODE VIOLATIONS

Mirachem takes the provisions of this Code very seriously and will treat any violations of the accordingly. A failure by any covered person to comply with this Code, any applicable laws, rules, or regulations governing our business, or any other policies or requirements, may result in disciplinary or other adverse action, up to and including termination of employment or contract and, if warranted, legal action against that person.

Any disclosure or reporting of incidents involving this Code or events of sufficient severity to warrant public notification shall be addressed via HCC's legal department.

T. QUESTIONS ABOUT CODE COMPLIANCE AND REPORTING VIOLATIONS

Any person having questions or concerns about compliance with this Code should contact the CEO of the business unit or another member of the Senior Management Team. If the reporting person does not feel that the issue is being resolved or is not feel comfortable reporting it to Mirachem management, they should call the HCC Ethics Hotline at 877-571-1134, or email the Chair of the HCC Audit Committee at Audit.Report@Crystal-Clean.com.

Employees and contractors have an affirmative duty and are required to report any violations of this Code. Failure to promptly notify a member of Mirachem's Senior Management Team, the HCC Ethics Hotline, or the Chair of the HCC Audit Committee is a violation of this Code and may result in disciplinary or adverse action by Mirachem.

Any report of a breach of this Code can be discussed without fear of any form of retaliation. Anyone reporting a violation of the Code through established procedures:

1. Will be treated with respect.
2. Will have their concerns taken seriously, and if not resolved at the time of the report, will be informed of the outcome if contact information has been provided.
3. Will not be required to identify themselves.
4. Will have information treated confidentially to the extent possible without Mirachem failing to fulfill its legal obligations.

If a report that this Code has been violated is received, the Company shall respond by investigating and enforcing this Code as follows:

1. The CEO of the business unit, a member of Mirachem's Senior Management Team, or the HCC Audit Committee will take all appropriate action to investigate any reports.
 - a. The investigation results, once completed, will be reported to the CEO of the Business Unit and the Senior Management Team.
 - b. The CEO will conduct such additional investigation as they deem necessary.
 - c. If it is determined that a violation of this Code has occurred, a report will be made to the HCC CEO.
 - d. The business unit CEO will take such disciplinary or preventive action as deemed appropriate, up to and including dismissal or, in the event of criminal or other serious violations of law, notification to appropriate law enforcement authorities.
2. Further, each violation or alleged violation involving the CEO of the business unit or a member of Mirachem's Senior Management Team shall be reported to the Chairperson of the Audit Committee; if appropriate, the Chairman of the Audit Committee shall participate in any such investigation.
 - a. The investigation results, once completed, will be reported to the Audit Committee.
 - b. The Audit Committee will conduct such additional investigation as it deems necessary.

- c. If the Audit Committee determines that the CEO of the business unit or member of Mirachem's Senior Management Team has violated this Code, it will report its determination to the HCC CEO. Upon being notified that a violation has occurred, the HCC CEO will take such disciplinary or preventive action as deemed appropriate, up to and including dismissal or, in the event of criminal or other serious violations of law, notification to appropriate law enforcement authorities.

U. WAIVERS OF THE CODE AND DISCLOSURE

Any waiver of this Code for any employee or contractor must be made by the CEO of the business unit. Any waiver of the Code for the business unit CEO must be made by the HCC CEO. All Requests for Waivers will be considered on a case-by-case basis.

V. CODE SHALL BE PUBLICLY AVAILABLE

This Code, and any amendments or supplements hereto, will be available online at Mirachem.com/ethics.