

PURSUIT

ALWAYS HONEST COMPLIANCE AND ETHICS PROGRAM

Pursuit's Always Honestsm Compliance and Ethics Program consists of the following main components:

Code of Ethics

The Code of Ethics, adopted by Pursuit's Board of Directors, summarizes the minimum ethical standards that guide the business conduct of all employees, officers, and directors of our company. These standards do not cover every issue that may arise, or every situation where ethical decisions must be made, but rather set forth key guiding principles that represent company policies and establish conditions for employment at Pursuit. Pursuit is committed to enforcing these standards through effective internal systems, reporting structures, and the Always Honestsm Compliance and Ethics Program. Violators of the Code of Ethics are subject to disciplinary action, including dismissal from employment. The Code of Ethics may be viewed on Pursuit's website at [Pursuit Code of Ethics](#).

Always Honestsm Compliance and Ethics Program Manual

It is the policy of Pursuit that its employees, officers, and directors shall at all times conduct business ethically and comply with applicable laws that apply to Pursuit's business activities. The Always Honestsm Compliance and Ethics Program Manual is our guide to ethical business conduct and contains specific standards and procedures relating to the areas of greatest potential vulnerability and criminal exposure for our companies, employees, and agents. Employees, officers, and directors of Pursuit are responsible for knowing, understanding, and upholding the standards and procedures contained in our Always Honestsm Compliance and Ethics Program Manual. Violators of the standards of conduct and procedures contained in the Program Manual are subject to disciplinary action, including dismissal from employment.

Tone-At-Top

The core values of integrity, ethical behavior and legal compliance are actively and frequently communicated by senior management to employees. The Board of Directors of Pursuit is committed to the success of our Always Honestsm Compliance and Ethics Program, and the full Board receives regular management presentations concerning the program. The Audit Committee assists the Board in monitoring the compliance by Pursuit with legal and regulatory requirements, which includes receiving reports from management regarding the status of the Always Honestsm Compliance and Ethics Program.

Management Responsibility

At Pursuit, leaders must show a commitment to Pursuit's values through their actions. They must also promote a culture where ethical behavior and legal compliance are expected. Annual performance reviews of management personnel include an ethics/compliance component.

Compliance Officer and Compliance Committee

Pursuit has a Compliance Officer who is responsible for the day-to-day administration, implementation, and oversight of ongoing compliance under the Program. The Compliance Officer, together with the Compliance Committee of Pursuit, form Pursuit's Compliance Team, which is responsible for implementing and monitoring the Always Honestsm Compliance and Ethics Program throughout Pursuit.

Compliance Training and Communications

To promote compliance with applicable laws, rules, and regulations, Pursuit conducts mandatory compliance training for its employees, officers, and directors. Annually, our employees, officers and directors reaffirm their understanding of, and commitment to, the standards of business conduct provided in the Code of Ethics and Always Honestsm Compliance and Ethics Program Manual.

Duty to Report Violations

As part of Pursuit's commitment to comply with applicable laws and promote an ethical culture, every employee, officer, and director has the affirmative duty to promptly report work-related activities by officers, employees, agents, or directors that violate the law, Always Honestsm Compliance and Ethics Program or company policies. Pursuit has established a variety of ways in which persons may report actual or suspected misconduct. A failure to honestly report misconduct, once a person has reason to believe that a violation has occurred, will result in disciplinary action up to and including termination. It is the policy of Pursuit to prohibit retaliation of any kind for reports or complaints of misconduct made by an employee or agent who in good faith reasonably believes the truthfulness of the report.

Always Honestsm Hotline (800-443-4113)

In support of the Always Honestsm program and to facilitate reporting of suspected misconduct, Pursuit maintains a toll-free Always Honestsm Hotline, which is available 24 hours a day, 7 days a week for individuals to report actual or suspected misconduct, ask questions or raise concerns, without fear of retaliation. Callers have the right to remain anonymous, if they wish.

Monitoring and Auditing

Pursuit strives to ensure that the Always Honestsm Compliance and Ethics Program is followed and is effective, including monitoring and auditing to detect illegal conduct and compliance violations and using outside independent auditors to evaluate periodically the program's effectiveness. Audits also may be conducted as a proactive means of monitoring compliance in areas of actual or potential risk.

Enforcement

Pursuit enforces legal and company standards and policies through appropriate incentives to perform in accordance with the compliance and ethics program as well as through appropriate disciplinary actions evaluated on a case-by-case basis. This includes discipline of persons who are responsible for or fail to detect an offense and discipline of persons who are aware of violations but fail to report them to the Company. Discipline can include dismissal, demotion, transfer, financial penalties, and reprimands. Persons who retaliate against others who report violations will also be subject to disciplinary action.

It is Pursuit's goal to be as consistent as possible across the enterprise in the execution of disciplinary decisions. To that end, any disciplinary action, including termination of employment, based on a violation of the law or an Always Honest standard of conduct must not be taken without prior review by the operating company's President/CEO or human resources vice president, or their designees.

Response and Prevention

All reports of alleged misconduct are responded to in an appropriate manner, including formal investigations of the allegations and focused efforts to prevent similar offenses in the future. Investigations are conducted in as confidential a manner as possible, depending upon the circumstances presented.