

LETTER FROM THE C.E.O.

Dear BioMed Realty, L.P., Employee:

BRE Edison L.P. (including BioMed Realty, L.P., and their respective subsidiaries, the “Company”) is dedicated to conducting its business consistent with the highest standards of business ethics. We have an obligation to our shareholders, employees, tenants, contractors, real estate brokers/agents, partners, lenders, community representatives and other business contacts to be honest, fair and forthright in all of our business activities.

As an employee of the Company, you are faced every day with a number of business decisions. It is your personal responsibility to uphold the Company’s high standards of business ethics in each one of these situations. It is not possible for our Code of Business Conduct and Ethics (the “Code”) to address every situation that you may face. If you use your good business judgment and experience, your business decisions are not likely to raise ethical issues. When you are faced with an ethical issue, we hope that the Code will serve as a guide to help you make the right choice.

We encourage you to take this opportunity to review our policies and to discuss any questions you may have with your supervisor or with the General Counsel directly. The guidelines set out in the Code are to be followed at all levels of this organization by our officers and employees. We rely on you to uphold our core values and conduct our business honestly, fairly and with integrity.

Sincerely,

Tim Schoen
Chief Executive Officer



CODE OF BUSINESS CONDUCT AND ETHICS

Purpose

This Code of Business Conduct and Ethics (this “Code”) contains general guidelines for conducting the business of the Company consistent with the highest standards of business ethics. This Code should be considered a minimum standard. To the extent that this Code requires a higher standard than required by commercial practice or applicable laws, rules or regulations, we adhere to these higher standards.

This Code applies to all of our officers and employees. We refer to all persons covered by this Code as “Company employees” or, simply, “employees.” We refer to any officer with a title of Executive Vice President or higher as an “executive officer.”

Vendor Code of Business Conduct and Ethics

This Code is complemented by our Vendor Code of Business Conduct and Ethics (the “Vendor Code”) applicable to our vendors and their employees, agents and subcontractors while conducting business with or on behalf of the Company. The Vendor Code is intended to promote our commitment to integrity and personal responsibility, and we expect our employees to carefully select vendors that hold themselves to high standards of business ethics, and to ensure compliance by those vendors with the guidelines and ethical standards embodied in the Vendor Code.

Seeking Help and Information

This Code is not intended to be a comprehensive rulebook and cannot address every situation that you may face. If you feel uncomfortable about a situation or have any doubts about whether it is consistent with the Company’s ethical standards, seek help. We encourage you to contact your supervisor for help first. If your supervisor cannot answer your question or if you do not feel comfortable contacting your supervisor, contact the General Counsel directly or use the EthicsPoint Reporting System, as described below.

The General Counsel is the lead attorney of the Company’s Legal Department, and may be contacted as follows:

Marie Lewis
Executive Vice President and General Counsel
BRE Edison L.P.
4570 Executive Drive, Suite 400
San Diego, CA 92121

Reporting Violations of this Code

- How to Report a Possible Violation or Concern

All employees have a duty to report any known or suspected violation of this Code, including any violation of the laws, rules, regulations or policies that apply to the Company.

If you know of or suspect a violation of this Code, immediately report the conduct to your supervisor. Your supervisor will contact the General Counsel, who will work with you and your supervisor to investigate your concern. If you do not feel comfortable reporting the conduct to your supervisor or you do not get a satisfactory response, you may contact the General Counsel directly. All reports of known or suspected violations of the law or this Code will be handled sensitively and with discretion. Your supervisor, the General Counsel and the Company will protect your confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern.

If you do not feel comfortable contacting your supervisor or the General Counsel, you may submit a report using the EthicsPoint Reporting System. This system is administered by NAVEX Global, a third party service provider. Reports may be made anonymously and confidentially as follows:

- Online: To submit a report from any computer with internet access, go to www.ethicspoint.com and, under "File a New Report via EthicsPoint" in the upper left-hand corner, enter "BioMed Realty" under "Enter Organization Name." You will be directed to a webpage dedicated to the Company. Once there, under "Select the country in which you are located," select either United Kingdom or United States. Then, under "Select the country in which the violation took place," select either United Kingdom or United States. Then click on "Continue" and follow the instructions provided on the site. Complete all information to the best of your knowledge.
- Telephone: You may call the EthicsPoint Reporting System via telephone at 1-855-435-7152 (for the U.S.) or 0800-032-8483 (for the U.K.), which is referred to as the "Reporting Line." EthicsPoint will administer the Reporting Line 24 hours per day, 365 days per year. When you call the Reporting Line, a compliance specialist will assist you in entering your report into the EthicsPoint Reporting System.

When you anonymously submit a report using the EthicsPoint Reporting System either online or via telephone, you will be asked to choose a password and will receive a unique user name known as a "Report Key." Because some relevant facts may be inadvertently omitted from the initial report, you can return to the EthicsPoint Reporting System again online or via telephone and access the original report to answer questions posed by a Company representative, and add further information that will help resolve open issues. The Company strongly suggests that you return to the EthicsPoint Reporting System to answer Company questions. This will enable you and the Company to engage in "anonymous dialogue," through which situations are not only identified but can be resolved. In certain circumstances it may be impossible for the Company to ensure absolute confidentiality and anonymity due to (a) the technology

associated with telephone systems and (b) the requirements of applicable laws, rules or regulations, or of courts or administrative authorities having jurisdictional authority.

You must not use these reporting systems in bad faith, or in a false or frivolous manner.

When possible, the Company will advise the reporting party of the results of the investigation.

- Discipline:

It is Company policy that any employee who violates this Code will be subject to appropriate discipline, which may include termination of employment. This determination will be based upon the facts and circumstances of each particular situation.

Employees who violate the law or this Code may expose themselves to substantial civil damages, criminal fines and prison terms.

The Company may also face substantial fines and penalties and may incur damage to its reputation and standing in the community. Your conduct as a representative of the Company, if it does not comply with both the law and this Code, can result in serious consequences for both you and the Company.

Policy against Retaliation

The Company prohibits retaliation against an employee who, in good faith, seeks help or reports known or suspected violations. Any reprisal or retaliation against an employee because the employee, in good faith, seeks help or files a report may result in disciplinary action, including potential termination of employment. If you believe you have been the subject of retaliation, please contact the General Counsel immediately.

Waivers of this Code

Waivers of this Code will only be granted in extraordinary circumstances. Any waiver of this Code for our employees other than executive officers may be made only by the General Counsel or Chief Executive Officer. Any waiver of this Code for our executive officers may be made only by the general partner of BRE Edison L.P. Any waiver granted shall not constitute a waiver for future purposes or bind the Company to grant any such waiver in the future.

CONFLICTS OF INTEREST

Identifying Potential Conflicts of Interest

A conflict of interest can occur when the private interest of an employee or his or her family member interferes (or reasonably appears to interfere) with the interests of the Company as a whole. You should avoid any private interest that influences your ability to act in the interests of the Company or that makes it difficult to perform your work objectively and effectively.

Identifying potential conflicts of interest may not always be clear-cut. The following situations are examples of conflicts of interest:

- Outside Employment and Service on Boards. No employee should be employed by, serve as a director of, or provide any services to a company that is a material tenant, contractor, real estate broker/agent, partner, lender, supplier or competitor of the Company. No employee should serve on a board of directors or trustees or on a committee of any entity (whether for-profit or not-for-profit) whose interests reasonably would be expected to conflict with those of the Company. Employees must obtain prior approval from the General Counsel before accepting any such board or committee position. The Company may revisit its approval of any such position at any time to determine whether service in such position is still appropriate.
- Improper Personal Benefits. No employee should obtain any material (as to him or her) improper personal benefits or favors because of his or her position with the Company. Please see “Gifts and Entertainment” below for additional guidelines in this area.
- Financial Interests. No employee should have a significant financial interest (ownership or otherwise) in any company that is a material tenant, contractor, real estate broker/agent, partner, lender, supplier or competitor of the Company. A “significant financial interest” means (a) ownership of greater than 1% of the equity of a material tenant, contractor, real estate broker/agent, partner, lender, supplier or competitor or (b) an investment in a material tenant, contractor, real estate broker/agent, partner, lender, supplier or competitor that represents more than 5% of the total assets of the employee.
- Loans or Other Financial Transactions. No employee should obtain loans or guarantees of personal obligations from or enter into any other personal financial transaction with any company that is a material tenant, contractor, real estate broker/agent, partner, lender, supplier or competitor of the Company. This guideline does not prohibit arms’ length transactions with recognized banks, brokerage firms or other financial institutions or any company that is a material tenant, contractor, real estate broker/agent, partner, lender, supplier or competitor, except that loans or guarantees of personal obligations are prohibited from any material contractors or broker/agents under any circumstances.
- Actions of Family Members. The actions of family members outside the workplace may also give rise to the conflicts of interest described above because they may influence an employee’s objectivity in making decisions on behalf of the Company. The following situations are examples of such conflicts of interest:
 - It is a conflict of interest if a family member is employed by or has a significant financial interest in a company that is a material tenant, contractor, real estate broker/agent, partner, lender, supplier or competitor of the Company.
 - It is a conflict of interest if a family member obtains loans or guarantees of personal obligations from or enters into any other personal financial transaction with any company that is a material tenant, contractor, real estate broker/agent, partner, lender, supplier or competitor of the Company to the extent such transaction is not at arms’ length.

- It is a conflict of interest if a family member receives improper personal benefits or favors as a result of an employee's position with the Company.

You should not discuss the Company's confidential information with members of your family who have such conflicting interests. For purposes of this Code, "family members" or "members of your family" include your spouse or life partner, brothers, sisters, parents, in-laws and children.

For purposes of this Code, a company is a "material" tenant of the Company if it is one of the Company's ten largest tenants in the Company's office portfolio based on annualized rent as of the most recent fiscal year. A company is a "material" contractor or a "material" supplier if the company has active engagements with the Company and/or its affiliates with financial commitments of an aggregate total of over \$5 million. A person or company is a "material" real estate broker/agent if the person or company has earned in excess of an aggregate total of \$1 million from transactions with the Company and/or its affiliates in any prior calendar year. A company is a "material" partner if either such company or the Company holds an investment in the other or the other's wholly owned or partially owned subsidiaries in excess of \$5 million in the aggregate. A company is a "material" lender if the Company has loans outstanding at any given time in excess of \$50 million from the lender. A company is a "material" competitor if the company competes in the Company's line of business and has annual gross revenues from such line of business in excess of \$100 million. If you are uncertain whether a particular company is a material tenant, contractor, real estate broker/agent, partner, lender, supplier or competitor, please contact the General Counsel for assistance.

Disclosure of Conflicts of Interest

The Company requires that employees disclose any situations that reasonably would be expected to give rise to a conflict of interest. If you suspect that you have a conflict of interest or something that others could reasonably perceive as a conflict of interest, you must report it to your supervisor or the General Counsel. Your supervisor and the General Counsel will work with you to determine whether you have a conflict of interest and, if so, how best to address it. Although conflicts of interest are not automatically prohibited, they are not desirable and may only be waived as described in "Waivers of this Code" above. Conflicts of interest of our executive officers may only be waived by the general partner of BRE Edison L.P.

CORPORATE OPPORTUNITIES

As an employee of the Company, you have an obligation to put the interests of the Company ahead of your personal interests and to advance the Company's interests when the opportunity to do so arises. If you discover or are presented with a business opportunity in the Company's line of business through the use of Company property or information or because of your position with the Company you should first present the business opportunity to the Company before pursuing the opportunity in your individual capacity. No employee may use Company property or information or his or her position with the Company for personal gain.

You should fully disclose to your supervisor the terms and conditions of each business opportunity covered by this Code that you wish to pursue. Your supervisor will contact the General Counsel and the appropriate management personnel to determine whether the Company wishes to pursue the business opportunity. If the Company waives its right to pursue the business opportunity, you may pursue the business opportunity on the

same terms and conditions as originally proposed and consistent with the other ethical guidelines set forth in this Code. Business opportunities available to executive officers may only be approved by the general partner of BRE Edison L.P.

CONFIDENTIAL INFORMATION

Employees have access to a variety of confidential information while employed at the Company. Confidential information includes all non-public information that might be of use to competitors or, if disclosed, harmful to the Company or its business partners. Employees have a duty to safeguard all confidential information of the Company or third parties with which the Company conducts business, except when disclosure is authorized or legally mandated. An employee's obligation to protect confidential information continues after he or she leaves the Company. Unauthorized disclosure of confidential information could cause competitive harm to the Company or its business partners and could result in legal liability for you and the Company.

Any questions or concerns regarding whether disclosure of Company information is legally mandated should be promptly referred to the General Counsel. You may request a copy of the Employee NDA Form (BioMed Realty, L.P., Confidentiality Agreement) from the General Counsel for more information.

COMPETITION AND FAIR DEALING

All employees should endeavor to deal fairly with fellow employees and with the Company's tenants, contractors, real estate brokers/agents, partners, lenders, suppliers, competitors and other third parties. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

Relationships with Tenants, Contractors, Real Estate Brokers/Agents, Partners, Lenders and Suppliers

Our business success depends upon our ability to foster lasting business relationships. The Company is committed to dealing with tenants, contractors, real estate brokers/agents, partners, lenders and suppliers fairly, honestly and with integrity. Specifically, employees should keep the following guidelines in mind when dealing with such companies or persons:

- Information an employee supply to tenants, contractors, real estate brokers/agents, partners, lenders and suppliers should be accurate and complete to the best of the employee's knowledge. Employees should not deliberately misrepresent information to tenants, contractors, real estate brokers/agents, partners, lenders and suppliers.
- Tenant, contractor, real estate broker/agent, partner, lender and supplier entertainment should not exceed reasonable and customary business practice. Employees should not provide entertainment or other benefits that could be viewed as an inducement to or a reward for tenant, contractor, real estate broker/agent, partner, lender or supplier decisions unless expressly approved by the Company. Please see "Gifts and Entertainment" below for additional guidelines in this area.

Relationships with Competitors

The Company is committed to free and open competition in the marketplace and throughout all business dealings. Employees should avoid all actions that could reasonably be construed as being anti-competitive, monopolistic or otherwise contrary to laws governing competitive practices in the marketplace, including Federal and state antitrust laws, such as misappropriation and/or misuse of a competitor's confidential information or making false statements about the competitor's business and business practices.

GIFTS AND ENTERTAINMENT

The giving and receiving of gifts is a common business practice. Appropriate business gifts and entertainment are welcome courtesies designed to build relationships and understanding among business partners. Gifts and entertainment, however, should not compromise or appear to compromise your ability to make objective and fair business decisions.

It is your responsibility to use good judgment in this area. As a general rule, you may give gifts or entertainment to or receive gifts or entertainment from tenants, contractors, real estate brokers/agents, partners, lenders or suppliers only if the gift or entertainment would not be viewed as an inducement to or reward for any particular business decision. All gifts and entertainment expenses should be properly accounted for on expense reports. The following specific examples may be helpful:

- Meals and Entertainment. You may occasionally accept or give meals, refreshments or other entertainment if:
 - The items are of reasonable value;
 - The purpose of the meeting or attendance at the event is business-related; and
 - The expenses would be paid by the Company as a reasonable business expense if not paid for by another party.

Entertainment of reasonable value may include food and tickets for sporting and cultural events if they are generally offered to other customers, suppliers or vendors.

- Advertising and Promotional Materials. You may occasionally accept or give advertising or promotional materials of nominal value.
- Personal Gifts. You may accept or give personal gifts of reasonable value that are related to recognized special occasions such as a graduation, promotion, new job, wedding, retirement or holiday. A gift is also acceptable if it is based on a family or personal relationship and unrelated to the business involved between the individuals.
- Gifts Rewarding Service or Accomplishment. You may accept a gift from a civic, charitable or religious organization specifically related to your service or accomplishment.

You should make every effort to refuse or return a gift that is beyond these permissible guidelines. If it would be inappropriate to refuse a gift or you are unable to return a gift, you should promptly report the gift to your supervisor. Your supervisor will bring the gift to the attention of the General Counsel, who may require you to donate the gift to an appropriate community organization. If you have any questions about whether it is permissible to accept a gift or something else of value, contact your supervisor or the General Counsel for additional guidance.

Gifts and entertainment may not be offered to or exchanged under any circumstances with any employees of Federal, state, local or foreign governments or departments. If you have any questions about this policy, contact your supervisor or the General Counsel for additional guidance.

PROTECTION AND USE OF COMPANY ASSETS

Employees should protect the Company's assets and ensure their efficient use for legitimate business purposes only. Theft, carelessness and waste have a direct impact on the Company's profitability. The use of Company funds or assets (regardless of whether for personal gain) for any unlawful or improper purpose is prohibited.

To ensure the protection and proper use of the Company's assets, each employee should:

- Exercise reasonable care to prevent theft, damage or misuse of Company property.
- Report the actual or suspected theft, damage or misuse of Company property to a supervisor.
- Use the Company's telephone system, other electronic communication services, written materials and other property primarily for business-related purposes.
- Safeguard all electronic programs, data, communications and written materials from inadvertent access by others.
- Use Company property only for legitimate business purposes, as authorized in connection with your job responsibilities.

Employees should be aware that Company property includes all data and communications transmitted or received to or by, or contained in the Company's electronic or telephonic systems. Company property also includes all written communications. Employees and other users of this property should have no expectation of privacy with respect to these communications and data. To the extent permitted by law, the Company has the ability, and reserves the right to monitor all electronic and telephonic communications. These communications may also be subject to disclosure to law enforcement or government officials.

COMPANY RECORDS

Accurate and reliable records are crucial to our business. Our records are the basis of our earnings statements, financial reports and other disclosures to the public, and guide our business decision-making and strategic planning. Company records include booking information, payroll, timecards, travel and expense reports, emails,

accounting and financial data, measurement and performance records, electronic data files, and all other records maintained in the ordinary course of our business.

All Company records must be complete, accurate and reliable in all material respects. Undisclosed or unrecorded funds, payments or receipts are inconsistent with our business practices and are prohibited. You are responsible for understanding and complying with our record keeping policy. Ask your supervisor if you have any questions.

POLITICAL CONTRIBUTIONS AND ACTIVITIES

The Company encourages its employees to participate in the political process as individuals and on their own time. Contribution and lobbying laws, however, limit the contributions the Company can make to political parties or candidates. It is Company policy that Company funds and assets shall not be used to make a political contribution to any political party or candidate, unless prior approval has been given by the Chief Executive Officer.

The following guidelines are intended to ensure that any political activity you pursue complies with this policy:

- Contribution of Funds. You may contribute your personal funds to political parties or candidates. The Company will not reimburse you for your personal political contributions.
- Volunteer Activities. You may participate in volunteer political activities during non-work time. You may not participate in political activities during work hours or otherwise use Company resources in such activities.
- Use of Company Facilities. Generally, the Company's facilities may not be used for political activities (including fundraisers or other activities related to running for office). The Company may, however, make its facilities available for limited political functions, including speeches by government officials and political candidates, with the approval of the General Counsel.
- Use of Company Name. When you participate in political affairs, you should be careful to make clear that your views and actions are your own, and not made on behalf of the Company. For instance, Company letterhead should not be used to send out personal letters in connection with political activities.
- Political Office. If you wish to hold a political office, whether elected or appointed, you must obtain prior approval from the General Counsel.

These guidelines are intended to ensure that any political activity you pursue is undertaken voluntarily and on your own resources and time. Please contact the General Counsel if you have questions about this policy.

COMPLIANCE WITH LAWS AND REGULATIONS

Each employee has an obligation to comply with all laws, rules and regulations applicable to the Company, including, without limitation:

- Antitrust. Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which the Company conducts business.
- Anti-Corruption. Avoid bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector, including the Company's vendors. Employees must comply with all applicable anti-corruption and anti-money laundering laws of any country in which they operate, including the U.S. Foreign Corrupt Practices Act. Employees must not, directly or indirectly, offer or pay anything of value (including travel, gifts, hospitality expenses and charitable donations) to any official or employee of any government, government agency, political party, public international organization or any candidate for political office for the purpose of improperly inducing such individual to misuse his or her position to promote the business interests of the Company in any respect. Employees should be honest, direct and truthful in all discussions with regulatory agency representatives and government officials.
- Licensing/Permits. Obtain all required licenses or permits to conduct business activities.
- Privacy. Comply with all laws and regulations regarding the privacy of information, data protection and cross-border data flows.
- Trade. Comply with all applicable trade controls, as well as all applicable export, re-export and import laws and regulations.

You are expected to understand and comply with all laws, rules and regulations that apply to your job position. If any doubt exists about whether a course of action is lawful, you should seek advice from your supervisor or the General Counsel.

PUBLIC COMMUNICATIONS

The Company places a high value on its credibility and reputation in the community. What is written or said about the Company in the news media and investment community directly affects our reputation, positively or negatively. Our policy is to provide timely, accurate and complete information in response to public requests (media, analysts, etc.) consistent with our obligations to maintain the confidentiality of competitive and proprietary information and to prevent selective disclosure of market-sensitive financial data. To ensure compliance with this policy, all news media or other public requests for information regarding the Company should be directed to the Company's Senior Director, Corporate Communications. The Senior Director, Corporate Communications will work with you and the appropriate personnel to evaluate and coordinate a response to the request.

ENVIRONMENT, HEALTH AND SAFETY

The Company is committed to providing a safe and healthy working environment for its employees and to avoiding adverse impacts and injury to the environment and the communities in which we do business. Company employees must comply with all applicable environmental, health and safety laws, regulations and Company standards. It is your responsibility to understand and comply with the laws, regulations and policies that are

relevant to your job. Failure to comply with environmental, health and safety laws and regulations can result in civil and criminal liability for you and the Company, as well as disciplinary action by the Company, up to and including termination of employment. You should contact the General Counsel if you have any questions about the laws, regulations and policies that apply to you.

Environment

All Company employees should strive to conserve resources and reduce waste and emissions through recycling and other energy conservation measures. You have a responsibility to promptly report any known or suspected violations of environmental laws or any events that may result in a discharge or emission of hazardous materials.

Health and Safety

The Company is committed not only to comply with all relevant health and safety laws, but also to conduct business in a manner that protects the safety of its employees. All employees are required to comply with all health and safety laws, regulations and policies applicable to their jobs. If you have a concern about unsafe conditions or tasks that present a risk of injury to you, please report these concerns immediately to your supervisor or the Human Resources Department.

EMPLOYMENT PRACTICES

The Company pursues fair employment practices in every aspect of its business. The following is intended to be a summary of our employment policies and procedures. Copies of our detailed policies are available from the Human Resources Department. Company employees must comply with all applicable labor and employment laws, including anti-discrimination laws and laws related to freedom of association, privacy and collective bargaining. It is your responsibility to understand and comply with the laws, regulations and policies that are relevant to your job. Failure to comply with labor and employment laws can result in civil and criminal liability for you and the Company, as well as disciplinary action by the Company, up to and including termination of employment. You should contact the General Counsel or the Human Resources Department if you have any questions about the laws, regulations and policies that apply to you.

Harassment and Discrimination

The Company is committed to providing equal opportunity and fair treatment to all individuals on the basis of merit, without discrimination because of race, including traits historically associated with race, such as hair texture and protective hairstyles; color; creed; gender; religion; sex; national origin; ancestry; citizenship or immigration status; pregnancy, including a woman's potential to get pregnant, childbearing, childbirth, lactation, or related medical or pregnancy-related conditions; age; marital status; registered domestic partner status; sexual orientation; gender identity and gender expression, including transgender individuals who are transitioning, have transitioned, or are perceived to be transitioning to the gender to which they identify; protected medical condition; genetic information, including testing and characteristics; physical, mental, or sensory disability, including the use of a trained dog guide or service animal; medical condition; military or veteran status, including status as an honorably discharged veteran; Civil Air Patrol status; status as an actual or perceived victim of domestic violence; certain criminal records; HIV testing; HIV/AIDS or hepatitis C status; a personal admission to

a facility for the care and treatment of a mentally ill person; taking of parental leave; political ideology; or any other consideration made unlawful by applicable federal, state or local laws. This Code also prohibits discrimination based on a perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics. The Company prohibits harassment in any form, whether physical or verbal and whether committed by supervisors, non-supervisory personnel or non-employees. Harassment may include but is not limited to offensive sexual flirtations, unwanted sexual advances or propositions, verbal abuse, sexually or racially degrading words, or the display in the workplace of sexually suggestive objects or pictures.

If you have any complaints about discrimination or harassment, report such conduct to your supervisor, the Human Resources Department, the General Counsel or the EthicsPoint Reporting System. All complaints will be treated with sensitivity and discretion. Your supervisor, the Human Resources Department and the General Counsel will protect your confidentiality to the extent possible, consistent with law and the Company's need to investigate your concern. Where our investigation uncovers harassment or discrimination, we will take prompt corrective action, which may include disciplinary action by the Company, up to and including, termination of employment. The Company strictly prohibits retaliation against an employee who, in good faith, files a complaint.

Any member of management who has reason to believe that an employee has been the victim of harassment or discrimination or who receives a report of alleged harassment or discrimination is required to report it to the Human Resources Department, the General Counsel or the EthicsPoint Reporting System immediately.

Alcohol and Drugs

The Company is committed to maintaining a drug-free work place. All Company employees must comply strictly with Company policies regarding the abuse of alcohol and the possession, sale and use of other controlled substances (including any products containing cannabis). Drinking alcoholic beverages is prohibited while on duty or on the premises of the Company, except at specified Company-sanctioned events. Possessing, using, selling or offering illegal drugs and other controlled substances (including any products containing cannabis) is prohibited under all circumstances while on duty or on the premises of the Company. Likewise, you are prohibited from reporting for work or driving a Company vehicle or any vehicle on Company business while under the influence of alcohol or any illegal drug or controlled substance.

Violence Prevention and Weapons

The safety and security of Company employees is vitally important. The Company will not tolerate violence or threats of violence in or related to the workplace. Employees who experience, witness or otherwise become aware of a violent or potentially violent situation that occurs on the Company's property or affects the Company's business must immediately report the situation to their supervisor, the Human Resources Department, the General Counsel or the EthicsPoint Reporting System.

The Company does not permit any individual to have weapons of any kind in Company property or vehicles, while on the job or offsite while on Company business. This is true even if you have obtained legal permits to

carry weapons. The only exception to this policy applies to security personnel who are specifically authorized by Company management to carry weapons.

You may request a copy of the Company's Employee Handbook from the General Counsel for more information.

CONCLUSION

This Code of Business Conduct and Ethics contains general guidelines for conducting the business of the Company consistent with the highest standards of business ethics. If you have any questions about these guidelines, please contact your supervisor or the General Counsel. We expect all Company employees to adhere to these standards.

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This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. We reserve the right to amend, supplement or discontinue this Code and the matters addressed herein, without prior notice, at any time.