

**Section XVII**  
**Amendment I**  
**Integrity Policy**  
**Corporate Governance: Business Code of Ethics**

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**Introduction**

Integrity is one of the core values the company embraces because in order to obtain and maintain customers for the company, we must not adopt the ideas or behaviors of a liar or a swindler. The Code echoes and expresses GEM's character, which includes the professional corporate culture, values, ideals, and philosophies. This policy will aid the company, its representatives, and you to avoid legal liability and prosecution. It is a risk management tool to help the company self-govern without outside government and/or legal agencies, and private services. Therefore, GEM will be able to address issues and resolve them on its own without interference from outsiders; for that reason, it will cause to keep the company's and your reputation in tact, maintain privacy issues, and allow management to constantly revise and implement a defaulted system that is constantly changing. Please take note that GEM is not advocating you to break any federal, state, or local laws; this policy emphasizes reporting of violations to management first. If the issue at hand is beyond the control of GEM, management will take the necessary steps to report the violations to the proper authorities. Most important, you are given the necessary avenues to address violations of the Code, company policies, and governmental laws while being anonymous in your concern(s) without facing retaliation from the company, its employees, or representatives. This policy will aid GEM with quality control, as wells as risk management; and in turn keep quality employees that embraces integrity.

Let this policy stand as a reminder to you that reporting violations is the correct, moral, and legal thing to do, regardless of the severity of the act or situation. You are one of the elements in the pursuit of the company's risk management committee to keep quality, integrity, and professionalism alive within the organization.

Please review the procedures below in dealing with legal, ethical, and moral dilemmas when you are faced with and wish to report a violation.

**Procedures for Reporting Violations**

You have the option to remain anonymous. GEM would like for you to take the following procedures (if you would like to remain anonymous please follow step number one only) in your report(s) of violation(s):

1. Contact the Chief Compliance Officer (CCO) immediately! Your Chief Compliance Officer's name is Mr. Clyde Rhodes. You may contact him by:
  - Phone: (909) 444-9500
  - Email: crhodes@go-gem.com
  - Mail: General Environmental Management  
Attention: Mr. Clyde Rhodes / CONFIDENTIAL  
3191 W. Temple Avenue  
Suite 250  
Pomona, CA 91768

If the complaint is in regards to the CCO, please follow step number four.

2. Next, notify your supervisor or manager, if necessary.
3. Wait for a response from your CCO, supervisor, or manager. If the CCO, supervisor, or manager has not contacted you within five business days, please contact him again as soon as possible. It is your responsibility to insist the CCO is notified of the situation. The CCO, your supervisor, or manager has the responsibility to address your concern(s) in a timely manner.
4. If the CCO, your supervisor or manager still has not contacted you within a period of 10 working days, please inform the Chief Executive Officer CEO, Mr. Tim Koziol. You may contact him by:
  - Phone: (909) 444-9500
  - Email: tkoziol@go-gem.com
  - Mail: General Environmental Management  
Attention: Mr. Tim Koziol / CONFIDENTIAL  
3191 W. Temple Avenue  
Suite 250  
Pomona, CA 91768
5. When and if there is no response from company's management, you may call or report the violation(s) to the proper authorities.

The Code and this policy will always be in constant revision due to regulatory laws changing and/or the company updating its files. Your CCO will notify you of any changes to this policy or the Code when they happen. Your acknowledgement of this policy is evidenced by your signature when you signed the form, "Statement of Fact: GEM's Business Code of Ethics."