

CODE OF ETHICS

Each Director of Hooper Irrigation shall abide by the following Code of Ethics:

1. Since directors are also shareholders in Hooper Irrigation Company, they shall not take water out of turn without proper permission, nor shall they conceal attempts to manipulate water for their benefit and control over the disadvantage of other shareholders.
2. All directors have a duty to act in the best interest of Hooper Irrigation Company. If your personal interests compromise that duty, you have a conflict of interest and must avoid it. All potential conflicts of interest must be declared to the board.
3. Hooper Irrigation Company's reputation and success depend on its directors conducting business with honesty and integrity. This means that the directors will act ethically and respectfully toward each other, the shareholders, vendors and all others with whom you work.
4. Confidentiality is vital to Hooper Irrigation Company's success. You are responsible for safeguarding business information that is confidential or proprietary. Sensitive information should never be disclosed to nonauthorized individuals, inside or outside Hooper Irrigation Company without permission.
5. The integrity of Hooper Irrigation Company's financial records is critical to the operation of our business and is a key factor in maintaining the confidence and trust of our employees and shareholders. You must work diligently to ensure that all transactions are properly recorded and that all records and data owned, used, and managed by the company are accurate and complete.
6. All Hooper Irrigation Company dealings with government officials should be marked by honest and professionalism. If you are representing Hooper Irrigation Company on government matters, you should be thoroughly familiar with all applicable laws and regulations for dealing with government agencies and officials.
7. All directors are expected to adhere to the highest standards of personal conduct. To meet this expectation, directors must comply with this Code of Ethics and all company policies, as well as all federal, state and local laws.