

Impulse Dynamics Code of Conduct



Message from our CEO



Dear Team,

Impulse Dynamics' Code of Conduct (the "Code") is a statement of our shared values that helps us operate openly, honestly, ethically, and in compliance with laws and regulations. Our Code is the cornerstone of our compliance program and guides our daily activities, decision-making and resolution of ethical challenges in accordance with our own policies and the laws, regulations, and codes that govern behavior across our industry.

Everyone at Impulse Dynamics, at all levels of the Company, is responsible for advancing our ethics-based culture and *making the right decisions at the right time and for the right reasons*. Every day, we must strive for the highest standards of patient safety, quality, and integrity in all that we do. We are expected to ask questions and raise concerns, and every manager must create an environment where those questions and concerns are welcomed and taken seriously.

We each have a responsibility to review and follow our Code and refer to it often in our work. Join me in making a commitment to uphold it in all that you do, and always seek guidance if you need additional assistance.

Thank you for following our Code, living our values, and fulfilling our most important objective:

Bringing Hope to Patients with Heart Failure.

Simos Kedikoglou *Chief Executive Officer*



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Code of Conduct

Our Code of Conduct ("Code") applies to everyone in our Company, at every level, including employees, supervisors, officers, and board members. We expect our third parties, including suppliers, distributors, agents, and consultants, to act in a way that is consistent with the principles and values of our Code when conducting business with or on behalf of Impulse Dynamics. We expect employees working with our third parties to hold them accountable.

Our Code outlines first principles and is meant to complement our existing standards, policies, procedures, and rules that we are required to follow. For further guidance, these standards, policies, procedures, and rules (including the Code) are accessible to all employees. Our Company will continue to create and update these policies as needed.

As a global Company, there may be limited circumstances where local law or other legal requirements differ from the standards set forth in our Code. Where local laws contain mandatory requirements that differ from the provisions of our Code, those local laws will prevail for employees working in those locations.

Impulse Dynamics plc, together with all of our subsidiaries and affiliates, is referred to collectively as Impulse Dynamics or the "Company".

Impulse Dynamics Mission:

To improve patients' quality of life by providing novel therapies for the heart failure community.



This Mission guides the Core Values for how we conduct business ethically, advance novel therapies, and support our employees and others.

Impulse Dynamics Core Values:

CREATIVITY

Diversity, Equity & Inclusion: Align our corporate responsibility, recruiting, and hiring strategies with Diversity, Equity & Inclusion initiatives.

Respect: Promote a culture of Respect, Professionalism, and Integrity at all levels throughout the organization.

EXCELLENCE

Winning Culture & Performance: Focus everything we do on the heart failure patients that we serve.

Goals Alignment: Achieve individual and team goals to drive corporate objectives.

TALENT

People Strategies: Recruit and retain the highest caliber staff committed to developing and compliantly promoting novel therapies.

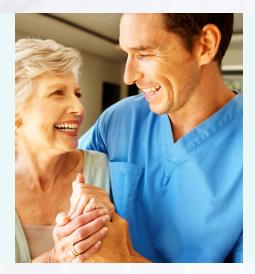
Professional Development: Invest in professional development opportunities to help our staff reach their fullest potential in service to heart failure patients worldwide.

TEAMWORK

Innovation: Foster a culture that encourages personal perspectives, creativity, and innovation.

Collaboration: Promote an environment with high levels of collaboration, transparency, and accountability.

Commitment to Our Team Members



Impulse Dynamics is committed to attracting and retaining the best talent and helping employees achieve their full potential. We hire, compensate, and promote based on qualifications, experience and skills. Additionally, we respect each employees' individual contributions and diverse perspectives. We support employees' professional growth and provide opportunities to share in the Company's success.

Hope is Here

DIVERSITY IN THE WORKPLACE

Impulse Dynamics welcomes and promotes diversity in the workplace. We value and respect all employees, their ideas, and their perspectives. We are committed to providing equal employment opportunities for all employees irrespective of their race, color, creed, religion, national origin, citizenship, gender identity or expression, sexual orientation, marital status, pregnancy status, age, medical condition, disability, military or veteran status, or any other characteristic protected by law.

AVOIDANCE OF DISCRIMINATION AND HARASSMENT

Impulse Dynamics will not tolerate discrimination or harassment of any kind based on a protected status. This includes any unwelcome or unwanted attention or discriminatory conduct based on an individual's race, color, creed, religion, national origin, citizenship, gender identity or expression, sexual orientation, marital status, pregnancy status, age, medical condition, disability, or military or veteran status. If workplace discrimination or harassment occurs, employees should report incidents as soon as possible.

Harassing behaviors can vary, but in general, they all share the purpose or effect of creating an intimidating, hostile or offensive work environment. Harassing acts can include, for example, unwanted sexual advances (whether verbal, physical, or through body language or innuendo), threats of violence, racial slurs and/or racism and offensive jokes or remarks. The same is true of bullying, which includes humiliating, insulting, intimidating, or isolating another individual.

HEALTH, SAFETY AND ENVIRONMENT

Impulse Dynamics is committed to protecting the health and safety of our customers, employees, the public and the

environment. We provide our employees with a safe and healthy workplace. We have a shared responsibility to maintain such a workplace by following health and safety rules and practices. These include reporting work-related accidents and injuries, as well as unsafe equipment, practices, or conditions. Regardless of the situation, certain behaviors are unacceptable.

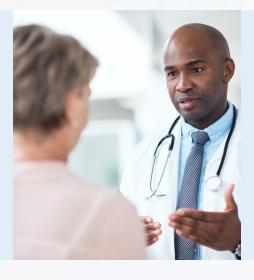
Violence and threatening behavior will not be tolerated. Violence includes threats, intimidation or attempts to instill fear in others. The use, possession, manufacture, sale, or distribution of drugs, alcohol or any other illegal substance in violation of applicable law or Impulse Dynamics' policies is prohibited on Company premises and/or on the job. We are expected to perform our duties unimpaired by drugs, alcohol or any other illegal substances.

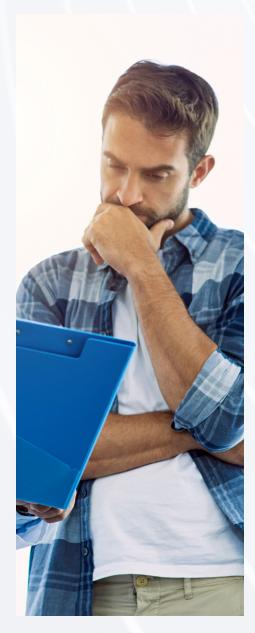
Impulse Dynamics conducts its activities in an environmentally sustainable manner to minimize negative effects on the environment. We are committed to complying with all applicable environmental laws, including those affecting air emissions, water purity, and waste disposal.



Expectations of Our Team Members

We all benefit from the Company maintaining a reputation for conducting business ethically and with integrity. Doing so builds trustful relationships and is a valuable Company asset. We all have a responsibility to maintain and enhance Impulse Dynamics' reputation.





PROTECT PATIENT, CUSTOMER AND EMPLOYEE PRIVACY

We respect the privacy rights of our employees, colleagues, patients, physicians, and other stakeholders in accordance with all relevant privacy laws. While conducting our business, we periodically need access to various types of personal information of our patients, customers, and employees. We are expected to access, use, transmit, store, and dispose of medical or other private personal information in a safe and secure way, and in accordance with applicable laws and regulations. We must know and understand the importance of our privacy and security policies and must comply with them. We are permitted to access and use only the patient information we need to perform our job duties and share information with others when there is a legitimate business reason to do so, the disclosure is not prohibited by law and is in accordance with Company policies and applicable law. Impulse Dynamics maintains appropriate physical, technical, and administrative security standards, and procedures to safeguard our patient, customer, and employee data and systems.

MANAGER AND SUPERVISOR RESPONSIBILITY

Managers and supervisors are expected to lead by example, to model and inspire ethics and integrity at work and to ensure the welfare and safety of patients. We rely upon managers and supervisors to demonstrate a strong commitment to our Mission, Core Values and the Code through their words and actions, including but not limited to:

- ensuring compliance and promoting personal accountability in others;
- ensuring that team members understand and meet their responsibilities to abide by the Code, Company policies and procedures, and relevant laws and regulations;
- creating an "open-door" environment where direct reports and other employees feel comfortable asking questions, voicing concerns, or reporting perceived misconduct;
- ensuring employees, contractors, or others who ask questions or voice their concerns are aware that the Company will not tolerate any form of retaliation for doing so; and
- raising questions or voicing concerns through the appropriate channels referenced in this Code.

Expectations of Our Team Members

PROTECT CONFIDENTIAL COMPANY INFORMATION

Information concerning Impulse Dynamics' business activities is often confidential and key to maintaining our competitive advantage. We all have a duty to use Company assets (both tangible and intangible) for legitimate purposes and to protect them from loss or unauthorized use. Disclosure of confidential information outside Impulse Dynamics could seriously damage our Company's interests. We all have a responsibility to safeguard our Company's information. Confidential information is information that is not generally known or readily available to others. This includes information such as technical knowhow and data, trade secrets, business plans, marketing and sales programs, sales figures, and changes in senior management.

In carrying out the Company's business, we may also learn confidential information about the Company's customers, distributors, or suppliers. Each of us must maintain the confidentiality of all information so entrusted to us, except when disclosure is authorized or legally mandated. We must safeguard confidential information by keeping it secure, limiting access to those who have a need to know in order to do their job, and avoiding discussion of confidential information in public areas such as planes, elevators, and restaurants and on mobile phones. This prohibition includes, but is not limited to, inquiries made by the press, analysts, investors or others. We also may not use such information for personal gain. These confidentiality obligations continue even after employment with the Company ends.

BUSINESS COURTESIES, GIFTS, AND FAVORS

Business courtesies (such as meals, gifts, and travel, etc.), excluding those involving health care professionals and government officials, may be provided or accepted only in accordance with the Company's policies and procedures. However, Impulse Dynamics believes that decisions about products and services should always be made in the best interests of patients. We do not try to earn business or influence decision-making by offering or accepting business courtesies, gifts, favors, or other transfers of value as improper inducements to decision makers.

CORPORATE OPPORTUNITIES

Employees, officers, and directors owe a duty to Impulse Dynamics to advance the Company's legitimate interests when the opportunity to do so arises. Such personnel are prohibited from directly or indirectly (a) taking for themselves personally opportunities that are discovered through the use of corporate property, information, or position, (b) using corporate property, information, or position for personal gain, or (c) competing with Impulse Dynamics.

CONFLICTS OF INTEREST

Employees, officers, and directors must act in the best interest of the

Company. A conflict of interest arises when a person's private interests could influence or interfere—or appear to interfere—with Impulse Dynamics' interests or when an employee, officer, director, or member of his or her family receives improper personal benefits as a result of his or her position at Impulse Dynamics.

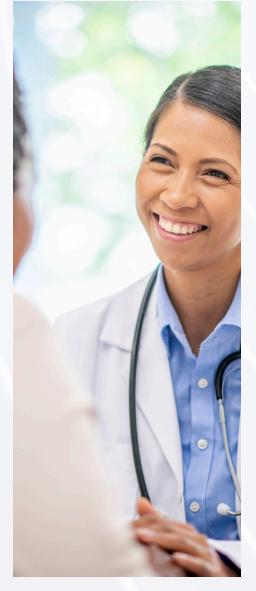


Expectations of Our Team Members

A conflict of interest can also arise indirectly. For example, a conflict of interest may arise when an employee, officer or director is also an executive officer, a major shareholder or has a material interest in a company or organization doing business with Impulse Dynamics. The existence of a conflict of interest depends upon the circumstances, including the nature and relative importance of the interests involved. Conflicts of interest are strictly prohibited unless they are disclosed to and resolved by Compliance in accordance with the Company's policies and procedures. All conflicts of interest or situations that may have the appearance of a conflict of interest should be reported promptly. Employees who are not sure whether a certain activity or situation might be or is an actual or potential conflict of interest should contact Compliance.

DISCLOSURES

The information in the Company's public communications, including in all reports and documents filed with or submitted to the SEC, must be full, fair, accurate, timely and understandable. To ensure the Company meets this standard, all employees, officers, and directors (to the extent they are involved in the Company's disclosure process) are required to maintain familiarity with the disclosure requirements, processes and procedures applicable to the Company commensurate with their duties. Each of us is prohibited from knowingly misrepresenting, omitting, or causing others to misrepresent or omit, material facts about the Company to others, including the Company's independent auditors, governmental regulators, and self-regulatory organizations.



CORPORATE & FINANCIAL RECORDS

Accurate information is essential for Impulse Dynamics' ability to meet legal and regulatory obligations. We are all responsible for recording, maintaining, and timely reporting information accurately and honestly. No employee or director may sign or submit or permit others to sign or submit on behalf of Impulse Dynamics any document or statement that he or she knows or has reason to believe is false or misleading. Additionally, Impulse Dynamics' books, records, accounts, and financial statements must be maintained in reasonable detail, must accurately reflect transactions, and must conform to legal requirements and internal controls. Records should be kept or destroyed according to record retention policies. For questions about financial records, contact the Corporate Controller.

USE OF CORPORATE ASSETS

Impulse Dynamics' workplace, materials, equipment, and third-party service providers are to be used for appropriate business purposes only. We each have a responsibility to protect these assets from theft, loss, misuse, and waste. Any suspected incident of fraud or theft should be immediately reported via the resources identified in the Code.

INSIDER TRADING

At any time Impulse Dynamics' shares are publicly traded, employees, officers, and directors are prohibited from engaging in insider trading, which is the trading in Impulse Dynamics' stock while aware of the confidential information that could, if it became public, affect the judgment of investors as to whether or not to buy, sell or hold the securities. Disclosure of any such information to others, including spouses, family, or friends, which would enable them to gain a trading benefit in Impulse Dynamics' stock not available to the general public, is also prohibited. Similar restrictions apply to trading in the stock of other companies using confidential information that an employee has access to because of his or her employment. This conduct is illegal and could subject the employee and Impulse Dynamics to civil liability and criminal penalties.

Integrity is Fundamental



Integrity is fundamental to who we are. It means doing what is right, by acting honestly and treating each other and our customers, patients, and suppliers fairly and with dignity. By acting with integrity, we reflect positively the values and reputation of the Company.

COMPLY WITH THE LAW, RULES, AND REGULATIONS

No matter where we conduct our individual work, following the laws, rules, regulations, and Company policies in the countries where we do business is not only required, but is also critical to our ability to operate and fulfill our Mission. Global laws and regulations are complex, subject to change, and often vary from country to country. This is why each of us must familiarize ourselves with and adhere to the laws, rules, regulations, and Company policies that apply to our individual work, and seek guidance whenever we have questions. Each of us must be cooperative and truthful in connection with any investigation conducted by or for the Company into possible violations of the law, rules, regulations, or Company policies. Any failure to do so will be grounds for discipline, up to and including termination.

ANTI-BRIBERY AND CORRUPTION

Corruption undermines our integrity and reputation and is contradictory to our Core Values. Impulse Dynamics is committed to complying with applicable antikickback, antibribery and anticorruption laws in all countries in which it operates and does business. No employee, director, consultant, distributor, supplier, or service provider shall offer, promise, authorize or pay a kickback, bribe, or anything of value (directly or indirectly) to an individual with the intent to obtain or reward favorable treatment in business transactions. Before giving anything of value, you should consult local laws. Just as you may not offer a bribe, you must also not accept one. If any unethical or illegal payments are requested of you by anyone, or if you believe someone is engaging in conduct that violates the Company's policies on bribery and corruption, or if you have any doubts or questions, contact Legal or Compliance for guidance.

INTERACTIONS WITH GOVERNMENT AND OTHER PUBLIC OFFICIALS

As a global business, we regularly interact with government employees and other public officials around the world. In many countries, interactions with government employees and other public officials are governed by very strict rules. In addition, laws such as the U.S. Foreign Corrupt Practices Act govern our behavior throughout the world. Interactions with government employees and other public officials must comply with these rules and be conducted with



APULSE

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Integrity is Fundamental



integrity. You should not do anything that could be viewed as an attempt to improperly influence decisions of a government, its officials, or its employees or that could be seen as encouraging government employees or public officials to violate rules that apply to them. Never offer or accept anything of value that could be seen as a bribe or kickback even if it would be permissible in the country in which the payment or gift is made. Remember that a bribe is not limited to the exchange of money but could also include the promise or giving of a gift, entertainment, travel, or a favor. Also, be aware that the concept of who is considered a government official is broadly defined and often includes employees at public hospitals among other public institutions (regardless of the person's rank or seniority within the organization, including members of the person's immediate family).

MPULSE

INTERACTIONS WITH HEALTHCARE PROFESSIONALS

Health care professionals are entrusted to care for patients' health and well-being, and it is essential that patients can trust that their interests are first and foremost. Therefore, we must ensure that our actions do not violate the trust that a patient must have in their health care provider. We do not improperly influence health care professional decision making.

We work with members of the healthcare community to ensure the continuous development and commercialization of new products, including paying them for services such as training, development, evaluation, and marketing activities. In doing so, we abide by all applicable laws, regulations, and industry guidelines when contracting with, working with, compensating, and otherwise reimbursing health care professionals in connection with their work for us. In contracting with a health care professional, we will not, under any circumstances, consider the value or volume of business, if any, generated by any health care professional with whom the Company works; and Impulse Dynamics will enforce its policies and procedures regarding interactions with such health care professionals vigorously and without exception.

SALES AND MARKETING ACTIVITIES

We are committed to marketing and selling our products in compliance with all applicable rules and regulations, and Company policies and procedures.

Our commitment also applies to all our other activities relating to the commercialization of our products, such as the collection and communication of medical and other information. Impulse Dynamics does not hire or retain people to work in our U.S. operations who have been declared ineligible by a U.S. government agency from participating in a U.S. government health care program. Any U.S. employee who is, or learns that he or she may become, such an ineligible person must immediately disclose this to Legal or Compliance.

PRODUCT PROMOTION

We represent our products and services accurately, and we will comply with applicable regulatory and legal requirements governing the marketing and sale of our products and services. Promotion and claims made about Impulse Dynamics' products shall be consistent with all applicable regulations. No public communication will be made, with the intent of promoting our products as safe and effective for any use before applicable regulatory approval is obtained, as required in the countries where we operate.

Integrity is Fundamental

COMPETITION, FAIR DEALING, AND ANTI-TRUST

We will compete for all business opportunities in the marketplace vigorously,

fairly, ethically, and legally. Additionally, as employees, officers, and directors, we must comply with all antitrust and other laws regulating competition and trade and will not discuss pricing, cost, production plans, business strategies, or any other proprietary or confidential information with our competitors.

Impulse Dynamics requires employees, officers, and directors to deal fairly with customers, suppliers, competitors, and other employees. We do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other intentional unfair dealing practice.



D Y N A M I C S

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Regulatory and Quality Excellence

Impulse Dynamics is committed to providing safe and effective devices that improve the quality of heart failure care and meet customer and regulatory requirements. This commitment is embodied in our research and development, clinical affairs, and regulatory activities.





OUR COMMITMENT TO QUALITY

As employees, officers, and directors of Impulse Dynamics we are committed to complying with all laws and regulations regarding the safety and efficacy of its products and the standards for our manufacturing plants, suppliers, and distribution. We maintain quality systems based on our various operating segments and our business. All employees, as required, shall become familiar with, and abide by, our quality system as applicable to them, and report any compromise in the quality of Impulse Dynamics' products to the applicable Impulse Dynamics personnel designated by the local quality system.

REGULATORY AFFAIRS

Our products are closely regulated by government agencies, health ministries, and other regulatory authorities worldwide. In order to ensure that those patients who may benefit from our product have access to them, we must abide by local regulatory requirements. We will acquire appropriate approvals and registrations to enter the marketplace, proper labeling controls, and all other requirements of government agencies.

CLINICAL RESEARCH

We are committed to ensuring the safety, privacy, and well-being of the patients who volunteer in our clinical trials. We fulfill our Mission by upholding the highest ethical, scientific, and clinical standards in all of our research initiatives worldwide, including through our commitment to complying with all applicable laws, regulations, and ethical guidelines and to maintaining the integrity and quality of clinical data from our sponsored studies to ensure our regulatory submissions are founded on data of the highest quality.

Regulatory and Quality Excellence

INTERNATIONAL TRADE RESTRICTIONS

Many countries in which we operate have laws controlling the import and export of technology, personal information, medical devices, and other goods.

Governments also periodically impose trade restrictions on certain countries, entities, and individuals. We must understand all Company import and export policies that apply to our job. Some countries have enacted laws that prohibit doing business with other countries. These laws are commonly referred to as boycotts or sanctions. You should contact Legal with any concerns or questions.

GOVERNMENT INSPECTIONS AND INVESTIGATIONS

From time to time, Impulse Dynamics may be contacted by, or receive requests for information from, government investigators. If an employee, officer, or director is contacted or receives a request, you should notify Legal immediately. It is the Company's policy to cooperate fully with government inspections and investigations. Employees, officers, or directors must never destroy or alter documents, lie, or make misleading statements to a government investigator, attempt to cause another employee to provide inaccurate information and/ or obstruct, mislead, or delay the communication of information or documents to government authorities. You are not permitted to provide documentation to government investigators without written preapproval from Legal.



External Communications and Engagement





We must communicate responsibly and in compliance with local laws, regulatory requirements, Company policies and procedures. The manner in which we communicate impacts the external perception and reputation of Impulse Dynamics, our employees and partners.

CORPORATE COMMUNICATIONS & SOCIAL MEDIA

All written and oral communications intended for external audiences including speeches, press releases, and presentations must be approved pursuant to Company procedures. The Internet provides unique opportunities to engage with internal and external stakeholders using a wide variety of tools, such as blogs, social networking sites, and chat rooms. These are great resources, but they are not without risk. Our use of social media should be compliant, ethical, and appropriate, and we must follow the Company's policies related thereto. We are not permitted to share confidential or proprietary information about Impulse Dynamics or our products on social networking sites or any other public forums, unless permitted to do so in adherence to Company procedures. In addition, when posting any comments about the Company's behalf, unless it is our job to do so, and we are acting in our official capacity.

CHARITABLE, EDUCATIONAL, OR HUMANITARIAN EFFORTS

We are committed to the communities in which we operate and conduct business by participation in and supporting bona fide charitable, educational, and humanitarian organizations and activities. The decision to provide support must never be intended for the purpose of improperly influencing the purchasing, leasing, recommendation, use, prescription, or coverage decisions associated with our products.



External Communications and Engagement

POLITICAL ACTIVITY

You are free to participate in personal political activity, but your involvement must be on an individual basis and on your own time and expense. When

participating in personal political activity, make it clear that your views and actions are your own and not those of Impulse Dynamics. You are not permitted to use the Company's assets or resources for any political activities without the specific prior approval of Legal. Corporate political contributions are not permitted.

Lobbying and other political activities on Impulse Dynamics' behalf are to be coordinated by Legal, and the Company is required by law to report to certain regulators regarding these activities. Therefore, anyone wishing to engage in political activities or lobbying on behalf of Impulse Dynamics, or to represent Impulse Dynamics in any way (including as a member of a trade association), must inform and obtain prior approval from Legal.





Applicability and Waivers





This Code is a statement of certain fundamental principles, policies, and procedures that govern the Company's directors, officers, and employees in the conduct of the Company's business. It is not intended to and does not create any rights in any employee, customer, client, visitor, supplier, competitor, shareholder, or any other person or entity.

Before an employee, or an immediate family member of any such employee, engages in any activity that would be otherwise prohibited by the Code, he or she must obtain a written waiver from the Board or other appropriate officer or body, and this waiver will be reported to our Audit and/or Corporate Governance Committee of the Board.

Before a director or executive officer, or an immediate family member of a director or executive officer, engages in any activity that would be otherwise prohibited by the Code, he or she must obtain a written waiver from the disinterested directors of the Board. And, to the extent required by the listing standards of any stock exchange where the Company's shares are then listed, such waiver must then be disclosed to the Company's shareholders, along with the reasons for granting the waiver.



Questions and Concerns

We work in a very complex environment where we may encounter situations with unclear or conflicting goals. If you have questions about whether an action is lawful or does not comply with our Code, seek advice.

Additionally, if you become aware of behavior that is potentially illegal, unethical, or is not consistent with our Code or Core Values, you should report this behavior as soon as possible. You should contact any of the following resources with questions, concerns or reports:

- Your supervisor or manager
- Human Resources
- Legal or Compliance
- Impulse Dynamics Hotline (see below)

Doing so protects the patients we serve, our customers, coworkers, our personal and professional integrity, and our Company's reputation. You are encouraged to ask questions and be empowered to report your concerns.

Another resource for raising questions or reporting concerns is the **Impulse Dynamics Hotline**. The Hotline is operated by a third-party hotline provider and is available 24 hours a day, seven days a week. You can either identify yourself in the report or report anonymously, if allowed by local law.

Impulse Dynamics Hotline Reporting	
Website:	Mobile Site:
impulsedynamics.ethicspoint.com	impulsedynamics.navexone.com

Toll-free Telephone Numbers:

United States: 833-254-2406

Austria: 0800 017958

0800 000 0459

Brazil:

4001208503 Germany: 0800 1818619

China:

Italy (includes San Marino, Vatican City): 800 959 187 Spain: 900876190 Sweden: 020-043 98 64

Switzerland: 0800 121 157

Uruguay: 000-413-598-5746

All reports of misconduct are taken seriously. Each report is reviewed by the Audit and/or Corporate Governance Committee of the Board or other appropriate officer or body to confirm whether further investigation is necessary and to determine the appropriate response. Violations of the Code will be subject to appropriate discipline, which for an employee may include termination of employment or, for a director, a request that such director resign. Impulse Dynamics respects the rights of all parties involved in potential misconduct and will handle all reports with discretion.

Impulse Dynamics does not tolerate retaliation against any employee who, in good faith, seeks help or reports known or suspected violations or non-compliant behavior with Company policy or the Code. Any reprisal or retaliation by individuals against an employee will be subject to disciplinary action, including potential termination of employment.

