

ETHICS

Code of Business Ethics and Conduct

Introduction

At Argon ST , we're known as a company that cares—about our customers, about our work, about our people, about our community, and about our country.

We are a company that stands behind its commitments, and nurtures a culture based on a straightforward, open approach to doing business. Argon ST is a company that is committed to maintaining open, honest, and respectful relationships with all of our team members—employees, customers, vendors, and stockholders. We are a company based on uncompromising integrity with a track record of outstanding customer satisfaction. It boils down to two key beliefs:

(1) “Uncompromising Integrity” which means staying true to the principles of honesty, fairness, and doing the right thing without compromise, even when circumstances make it difficult.

(2) “Constant Respect for People” which means we treat others with dignity, as we would like to be treated ourselves. Constant respect applies to every individual we interact with as part of our business.

Each of us is expected to demonstrate these key beliefs in our work at Argon ST .

Purpose of the Code of Business Ethics and Conduct

This Code of Business Ethics and Conduct is a guide to help those of us who work at Argon ST -- as well as our Board of Directors, subcontractors, and those affiliated with us -- to live up to the Company's high ethical standards. This Code is not a comprehensive manual that covers every situation that we may encounter while working at Argon ST . Instead, it sets forth our standards. It highlights key issues and identifies policies and resources to help you reach decisions that will make all of us proud that we work at Argon ST .

Each of us has the personal responsibility to make sure that our actions abide by this Code of Ethics and the laws that apply to our work. If you have any questions or concerns about illegal or unethical acts, this Code gives you resources for obtaining information as well as for reporting unethical or illegal conduct.

This Code is a resource for you. You are required to read it thoroughly and to understand it. You should also refer to it any time you have a question about ethics or appropriate conduct.

Keep in mind that failure to abide by this Code will lead to disciplinary measures appropriate to the violation, including immediate dismissal. Failure to take reasonable steps to prevent, detect or report improper conduct may also result in disciplinary measures, including immediate dismissal.

The Role of Managers

Argon ST Managers are expected to lead according to our standards of ethical conduct, in both words and actions. Managers are responsible for promoting open and honest two-way communications. Managers must be positive activists and role models who show respect and consideration for each of our employees but who also diligently enforce the policies of the Company and this Code. Managers must be proactive in looking for indications that unethical or illegal conduct has occurred and are expected to take appropriate and consistent actions by follow the reporting procedures in this Code.

Our Responsibilities

The following sections detail our responsibilities to each of our constituent groups – each other, our customers, our stockholders, our competitors, our communities and our governments. A final responsibilities section addresses our particular duties with regard to avoidance of conflicts between our own interests and that of the Company. You will

notice as you read and refer to this Code that many of these responsibilities are interlocking: they affect more than one group. It's therefore easy to see how unethical behavior can have a ripple effect throughout the Company and beyond. It's also equally easy to see how conduct in accordance with this Code of Business Ethics and Conduct can benefit everyone with whom we come into contact during our work at Argon ST.

Our Responsibilities To Each Other

Respect for the Individual

We will treat each other with respect and fairness at all times, just as we wish to be treated ourselves. Insubordination and discriminatory conduct is prohibited. Employment decisions must be based on business reasons, such as qualifications, talents and achievements, and must comply with local and national employment laws. Teamwork is critical to our success; disruptive activity is prohibited.

Harassment

Abusive or harassing conduct is unacceptable and is strictly prohibited, whether verbal, physical or visual. We are encouraged to speak out when a coworker's, vendor's or customer's conduct makes us uncomfortable. Each of us has the obligation to report harassment when it occurs, regardless of whether we are the victim or just an observer. If you believe that you have witnessed or been the victim of some form of harassment, notify your Supervisor or Human Resources immediately. If you are uncomfortable doing so, contact the Ethics Hotline.

Safety and Health

We are all responsible for maintaining a safe workplace by following all safety and health rules and practices. We are responsible for immediately reporting accidents, injuries and unsafe equipment, practices or conditions to a supervisor or other appropriate person. ArgonST is committed to keeping its workplaces free from hazards. In order to protect the safety of all employees as well as that of our vendors, customers and visitors, each of us must report to work free from the influence of any substance that could prevent us from conducting work activities safely and effectively, including alcohol or drugs. The use of illegal drugs or the abuse of alcohol or prescription drugs in the workplace is grounds for immediate dismissal. Threats or acts of violence or physical intimidation, and the unauthorized possession of dangerous materials, such as explosives or firearms, are prohibited.

Our Responsibilities to Customers

Product Quality and Safety

Argon ST's reputation is valuable. To maintain that reputation, compliance with our quality processes and safety requirements is essential. We damage our good name when we ship products or deliver services that fail to live up to Argon ST 's standards.

Sales and Marketing

We build long term relationships with our customers by demonstrating honesty and integrity. All of our marketing and advertising will be accurate and truthful. Deliberately misleading messages, omissions of important facts or false claims about our products or those of our competitors are never acceptable. We must obtain business solely through legal and ethical means. False statements of any nature to the government are against the law and are strictly prohibited.

Customer Information

We must protect customer information that is sensitive, private, proprietary or confidential just as carefully as we protect our own. Only those who have a need to know should have access to customer proprietary information. Classified information is of course regulated by federal law and must be protected accordingly.

Governments

We must take special care to comply with all legal and contractual obligations in dealing with governments. National governments all around the world have specific and varied procurement laws and regulations that have been established to protect the public interest. These laws generally prohibit, or put strict limits on, gifts, entertainment and travel offered to government officials. (Guidance concerning customer gifts, travel and entertainment is in the Conflict of Interests section of this Code.) Laws also often apply to the hiring of current or recently retired officials and their families and to any conduct that may be viewed as improperly influencing objective decision making. Many other laws strictly govern accounting and billing practices applied to the fulfillment of government contracts and subcontracts.

The United States has some of the strictest laws in the world, and we must ensure that we comply with them thoroughly and at all times. As in most countries, in the United States, bribes, gratuities and kickbacks are unethical and illegal and are prohibited. False statements of any nature to the government, including false pricing, fraudulent timekeeping or billing, and the acceptance of unwarranted payments, are also prohibited. We must also understand and comply with all procurement integrity, revolving door and other conflict of interest legislation, as well as with federal and state election laws. Finally, various U.S. laws also apply to U.S. companies doing business overseas, and we are responsible for compliance with those laws in our activities abroad.

When Argon ST uses suppliers or subcontractors to fulfill its commitments, we may also be responsible for communicating these government requirements to them. Those of us who deal with government officials and contracts are responsible for knowing and complying with applicable laws and regulations.

If you have any questions on the legality of your actions or those of others, contact General Counsel. For specific issues dealing with government contracts, contact General Counsel or the Contracts Department.

Purchasing Practices

Purchasing decisions must be made based solely on Argon ST's best interests – which include legal and ethical decision-making processes. Suppliers win Argon ST's business based on product or service suitability, price, delivery and quality. Purchasing agreements must be documented and clearly identify the services or products to be provided, the basis for earning payment and the applicable fee or rate. The amount of payment must be commensurate with the services or products provided. Employees who have a financial interest in or any other type of close involvement with vendors and subcontractors must not be involved in purchasing decisions related to those vendors or subcontractors but must clearly and unambiguously remove themselves from the decision process.

Our Responsibilities To Our Stockholders

Protecting Argon ST's Assets

We have a responsibility to protect the Argon ST assets entrusted to us from loss, damage, misuse or theft. Argon ST assets such as funds, products, or property (including phones, email and Internet access) may only be used for business purposes and other purposes approved by management, and must never be used in an illegal manner or to promote illegal or unethical activities. Customer- or vendor-owned property must be treated in the same manner. Negligence or improper conduct leading to the damage of our or our affiliates' property is prohibited. Theft or unauthorized removal or possession of property is grounds for disciplinary action up to and including immediate termination.

Proprietary Information

We will safeguard all proprietary information by marking information accordingly, keeping it secure and limiting access to those who have a need to know in order to do their jobs. Proprietary information includes any information that is not generally known to the public and is helpful to Argon ST or would be harmful in the hands of competitors. It includes information that suppliers and customers have entrusted to us. The obligation to preserve proprietary information continues even after employment with Argon ST ends. The unauthorized disclosure of business “secrets” or confidential information is prohibited. If you have questions about protecting proprietary information, contact General Counsel or the Contracts Department. For concerns about protection of classified data, contact the Security Department.

Inside Information and Securities Trading

We are not allowed to trade in securities or any other kind of property based on knowledge that comes from our jobs, if that information hasn't been reported publicly. It is against the laws of the United States to trade or "tip" others who might make an investment decision based on information learned on the job. For example, using non-public information to buy or sell Argon ST stock, options in Argon ST stock or the stock of an Argon ST customer or supplier is prohibited. Individuals who violate the insider trading laws are potentially liable for civil damages, as well as criminal fines and imprisonment, and companies may face civil penalties. To avoid serious civil and criminal liability, all Argon ST employees are to keep confidential all non-public information they possess regarding Argon ST or any other publicly-traded company. In addition, certain employees are subject to regular stock reporting as well as to periodic blackouts, when no trading may be performed in Argon ST stock. . If you have any questions about securities trading or insider information, contact General Counsel.

Accuracy of Company Records

We require honest and accurate records and reporting of information in order to make responsible business decisions. This includes such data as quality, safety and personnel records, as well as financial and timekeeping records.

All financial books, records and accounts must accurately reflect transactions and events and conform both to required accounting principles and to Argon ST's system of internal controls. No false or artificial entries may be made. When a payment is made, it can only be used for the purpose spelled out on the supporting document. Knowingly false financial statements may subject employees as well as the Company to multiple criminal and civil penalties, and any employee found making a knowingly false financial statement will be disciplined accordingly, up to and including immediate termination.

Recording and Retaining Business Communications

All business records and communications must be clear, truthful and accurate. Business records and communications often become public through litigation, government investigations or the media. We will avoid exaggeration, unprofessional language, guesswork, legal conclusions or derogatory remarks or characterizations of people and companies. This applies to communications of all kinds, including e-mail and "informal" notes and memos. All communications are considered the property of Argon ST and should be retained and/or destroyed according to Argon ST's record retention policy. Argon ST has the right to investigate, read, copy and retain all communications created or stored on Argon ST property, including company-owned hard drives, Internet access, and email systems.

Communicating to External Audiences

To ensure professional and consistent handling, employees must never make any statements on behalf of Argon ST. Requests from the media should be forwarded to the Chief Executive Officer's office or via email to media@argonst.com. Unfortunately, many well-intentioned interviewees have had their version of stories misinterpreted by reporters. Argon ST employees are expected to cooperate with reasonable requests for information from government agencies and regulators, but we should consult with General Counsel before responding to any non-routine requests. (Employees are always free to choose, but do not need to choose, to speak with government agents in the course of a government investigation but should report the contact to General Counsel first.) All information provided must be truthful and accurate. We must not alter or destroy documents or records in response to an investigation or other lawful request; to do so is a violation of law. Requests for information from financial analysts and shareholders should be forwarded to the Chief Financial Officer.

Our Responsibilities To Our Competitors

Competitive Information

We must never use any illegal or unethical methods to gather competitive information. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent (including possession of protected information belonging to a prior employer), or inducing such disclosures by past or present employees of other companies is prohibited.

If information that may constitute a trade secret or confidential information of another business is obtained by mistake, or if we have questions about the legality of information gathering, we should consult with General Counsel.

Fair Competition

Argon ST and all its employees are required to comply with the unfair competition laws of each country in which we do business. These laws are complex and vary considerably from country to country. If we question whether an action may violate unfair competition laws, we should discuss it with our management and General Counsel.

Our Responsibility To Our Communities

Environmental

We will respect the environment by complying with all applicable environmental laws in all countries in which we conduct operations. Argon ST is committed to the protection of the environment to the best of our ability by minimizing the environmental impact of our operations and operating our businesses in ways that will foster a sustainable use of the world's natural resources. Notify management if hazardous materials come into contact with the environment or are improperly handled or discarded.

Our Responsibilities to Governments

Compliance with the Law

Argon ST employees are required to comply with all applicable laws and regulations wherever we do business. Perceived pressures from supervisors or demands due to business conditions are not excuses for violating the law. When we have any questions or concerns about the legality of an action, we are responsible for checking with General Counsel.

Argon ST Political Activities

No Argon ST employee may make any political contribution on behalf of Argon ST or use Argon ST's name, funds, property, equipment or services for any type of support of political parties, initiatives, committees or candidates. Similarly, employees may not request reimbursement of time or funds used in support of political activities. However, employees may voluntarily contribute a limited amount of funds per calendar year to Argon's Separate Segregated Fund (SSF), also known as a PAC,. The Argon ST PAC is a bipartisan political action committee that enables the Company to legally contribute money to elect and help keep in office those state and federal legislators and officials who make laws and policy that are beneficial to the interests of the Company. Additionally, lobbying activities or government contacts on behalf of Argon ST, other than sales activities, must be coordinated with the Chief Executive Officer.

Anti-Corruption Laws

Argon ST and its employees and vendors must comply with the anti-corruption laws of the countries in which we does business, including the U.S. Foreign Corrupt Practices Act, which applies to all its foreign business. Argon ST employees will not directly or indirectly offer or make a payment to government officials, including employees of state-owned enterprises, intended to improperly influence the conduct of business. These requirements apply both to Argon ST employees and agents, such as third party sales representatives, no matter where they are doing business. If you are authorized to engage agents, make sure you first coordinate with both General Counsel and our Manager of Import-Export Compliance.

Crossing National Borders

When importing or exporting products, services, information or technology, Argon ST will comply with applicable U.S. and other national laws, regulations and restrictions. In addition, when we travel internationally on company business we are subject to laws governing what we import and export. Argon ST employees are responsible for knowing the laws that pertain to them and for checking with the Manager of Import-Export Compliance when in doubt.

Conflicts Of Interest

General Guidance

Business decisions and actions must be based on the best interests of Argon ST , and must not be motivated by personal considerations or relationships. Relationships with prospective or existing suppliers, contractors, customers, competitors or regulators must not affect our independent and sound judgment on behalf of Argon ST. Below are several of the most common examples of situations that may cause a conflict of interest. We are required to disclose to senior management any situation that may be, or appear to be, a conflict of interest. When in doubt, it is best to disclose.

Outside Employment

Argon ST employees may not work for or receive payments for services from any competitor, customer, distributor or supplier of Argon ST's without approval of the President and General Counsel. Any outside activity must be strictly separated from our employment with Argon ST and must not harm our job performance at Argon ST .

Board Memberships

Serving on the board of directors or similar body of an outside company or government agency requires the advance approval of the President and General Counsel. Helping the community by serving on boards of directors of non-profit or community organizations is encouraged, and does not require prior approval.

Family Members and Close Personal Relationships

We may not use personal influence to get Argon ST to do business with a company in which we, our family members or our friends have a financial interest.

Investments

Argon ST employees may not allow their investments to influence, or appear to influence, their independent judgment on behalf of Argon ST . This could happen in many ways, but it is most likely to create the appearance of a conflict of interest if an Argon ST employee has an investment in a competitor, supplier, customer or distributor and his or her decisions may have a business impact on this outside party. If there is any doubt about how an investment might be perceived, it should be disclosed to General Counsel.

We are also prohibited from directly or indirectly buying or otherwise acquiring rights to any property or materials, when we know that Argon ST may be interested in pursuing such an opportunity.

Gifts

Gifts are not always physical objects – they might also be services, favors or other items of value.

Gifts to Argon ST Employees

Argon ST employees don't accept kickbacks, lavish gifts or gratuities. We can accept items of nominal value, such as small promotional items bearing another company's name. We will not accept anything that might make it appear that our judgment for Argon ST would be compromised.

Gifts Given by Argon ST Employees

Some business situations call for giving gifts. A gift from an Argon ST employee must be legal, reasonable and approved by senior management and General Counsel. Argon ST employees must never pay bribes, give gratuities or accept kickbacks. We will not provide any gift if it is prohibited by law or by the policy of the recipient's organization. For example, the employees of many governmental entities both in the U.S. and abroad are prohibited from accepting gifts. We must also be aware that the definition of “gift” may vary among government agencies, and we are responsible for knowing the difference.

Entertainment

We consider “entertainment” to include a representative of both parties at the event. Anything other than that is a gift and must be considered in light of that definition.

Entertainment of Argon ST Employees

We may accept entertainment that is reasonable in the context of business and that advances Argon's interests. For example, accompanying a business associate to a local cultural or sporting event or to a business meal would, in most cases, be acceptable.

Entertainment that is lavish or frequent may appear to influence one's independent judgment on behalf of Argon ST. If an invitation seems inappropriate, we must turn down the offer or pay the true value of the entertainment ourselves. Accepting entertainment that may appear inappropriate must be discussed with General Counsel, in advance if at all possible.

Entertainment by Argon ST

We may provide entertainment that is reasonable in the context of the business. If we have a concern about whether providing entertainment is appropriate, we will discuss it with General Counsel.

Entertainment of government officials is often prohibited by law. Again, obtain prior approval from General Counsel in each case.

Travel

1) Acceptance of Travel Expenses

Argon ST employees may accept transportation and lodging provided by an Argon ST supplier or third party only if the trip is for a business purpose and is approved in advance by the employee's supervisor. All travel accepted must be accurately recorded in our travel expense records.

2) Providing Travel

Unless prohibited by law or the policy of the recipient's organization, Argon ST may pay the transportation and lodging expenses incurred by customers, agents or suppliers in connection with a visit to an Argon ST facility or in support of an Argon ST business activity. The visit must be for a business purpose, for example, an on-site examination of equipment, contract negotiations or training.

In both cases, “business purpose” means a trade show or demonstration and does not include activity meant to unfairly influence business decisions.

All travel by government officials that is sponsored or paid for by Argon ST must be approved in advance by General Counsel.

Exceptions

Only the Chief Executive Officer is authorized to grant exceptions to this Code of Business Ethics and Conduct. When an exception is applicable to an Executive Officer, it must be granted by the Board of Directors.

Ethics Violation Reporting and Protections

Commitment

As stated in this Code of Business Ethics and Conduct, Argon ST is known as a company that cares—about our customers, about our work, about our people, about our community, and about our country.

We are a company that stands behind its commitment to uncompromising integrity and outstanding customer satisfaction. Each of us is expected to demonstrate these key beliefs in our work at Argon ST. This Code of Business Ethics and Conduct is meant to strengthen that commitment. If you know of anyone or any situation that does not meet our ethical standards, you should report your concern.

Complaint Procedures

There are several ways to file a concern. The following procedures are designed to permit you to come forward, on an anonymous basis if you wish, and be assured of prompt investigation and correction of any concerns raised. Any employee who in good faith files a concern under this policy is protected from retaliation.

Argon ST takes even the appearance of ethical misconduct seriously. Such conduct hurts the credibility and financial viability of the Company, and we expect our employees to bring such conduct to our attention. In fact, reporting unethical behavior reflects favorably on your commitment to your responsibilities while failure to report reflects negatively.

If you observe unethical behavior, there are several different courses of action you can take. An explanation of each of these alternatives follows.

While most of these alternatives allow you to report issues anonymously, you must carefully consider whether or not an anonymous report will result in elimination of the unethical or allegedly unethical conduct. Although the ethics hotline and website allow for two-way communication while still protecting your anonymity, if your identity is a material element of your complaint, the Company may be unable to take corrective action without knowing who you are. This may impact the satisfactory resolution of your complaint – so you should thoroughly assess the nature of your ethical issue.

If you wish to file a complaint or concern, you may:

- Speak directly to the person involved. Argon ST encourages employees to report concerns internally because it allows the company to become immediately aware of issues and to begin addressing them expeditiously. If you witness unethical behavior, you may start by addressing it directly with the person behaving unethically. It is possible that the person doesn't realize his or her actions are unethical. By speaking to this person directly, you are giving them the opportunity to see the error of their ways and to correct their behavior.
- If speaking directly to the person fails to correct the problem, or if you feel uncomfortable addressing the situation with them, you can explain the situation to any member of the senior management team, Human Resources, or member of the Ethics Committee.
- If you witness illegal behavior, you must immediately report it to General Counsel and the CEO or President.
- Speak directly to any member of senior management, Human Resources, or member of the Ethics Committee. The Ethics Committee consists of 5 members of Argon's management team (Chief Operating Officer, Chief Financial Officer, Human Resources Director, General Counsel, and one other member of senior management) whose charter it is to ensure the company is in compliance with this Code by investigating concerns, implementing solutions, documenting results, referring issues to the Audit Committee (on a Sarbanes-Oxley related matters), and reporting to the person who initiated the concern. The Ethics Committee also analyzes all complaints on a quarterly basis for trends and evaluates recommendations for improvement. The Ethics Committee is also tasked to perform an annual audit of the entire ethics program, including process, communication, and effectiveness.
- Use the online Ethical Advocates form to report the issue or call the Argon ST Ethics Hotline. You can access the form by visiting Argon's external website at www.argonst.com and clicking on the Ethical Advocates link. You can also go directly to the form by visiting argonst.ethicaladvocate.com. You may use the online form anonymously. Follow the instructions to document your concern, which will then be forwarded to Argon's Ethics Committee for review. The Ethics Committee will pass it on to the Audit Committee, if it concerns financial abuse. An initial response from the Ethics Committee will be posted on this site, where you can access it anonymously.

- Another option is to call the Argon ST Ethics Hotline at 800-798-8692. Your concern will be documented and forwarded to the Ethics Committee for review, who will then pass it on to the Audit Committee, if it concerns financial abuse. You may use this hotline anonymously.

- For financial fraud concerns, contact the Audit Committee of the Board of Directors using the Sarbanes-Oxley procedures. Argon ST, Inc. and its subsidiaries are committed to compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. The types of activities that are prohibited include but are not limited to: fraud and misrepresentation of financial records and activities that would preclude the fair and accurate reporting of financial matters of the company.

- If addressing the issue internally fails to solve the problem, or if you feel uncomfortable following internal channels, you may report issues of financial fraud or abuse to the Audit Committee of the Board of Directors under the Sarbanes-Oxley Act. The Audit Committee consists of 3 members of the Corporations Board of Directors whose charter it is in part to ensure that the Company is in compliance with the Sarbanes-Oxley Act of 2002. The Sarbanes-Oxley Act of 2002 requires that companies such as Argon ST establish procedures to receive and respond to complaints regarding unethical behavior in the area of financial misdeeds. If you witness unethical conduct regarding financial matters that you feel is serious enough to be brought to the attention of the Audit Committee, you should follow these procedures, which are as follows:

First, reduce the matter to writing, with the pertinent facts as known. You may do so anonymously if you wish.

Second, place the document in a sealed envelope, address the envelope to the Audit Committee, and submit it to the Human Resources Department.

Third, the Human Resources Department will forward the envelope unopened to a member of the Audit Committee by certified mail, return receipt requested.

The Sarbanes-Oxley Act protects employees who report financial misdeeds in accordance with the Act. These protections are known as “whistleblower protections” and prevent retaliation against employees for good faith reporting of financial abuses. Section 806 of the Sarbanes-Oxley Act prohibits retaliation of any kind against employees who engage in certain “whistleblowing” activities. Employers must not "discharge, demote, suspend, threaten, harass, or in any other manner discriminate against" any employee in the terms and conditions of employment because the employee participates in lawful protected conduct that is designed to expose or assist with investigations of federal fraud violations. Specifically, employee conduct that is protected from retaliation includes:

Providing information to or otherwise assisting in an investigation by a federal regulatory or law enforcement agency, any member of Congress or committee of Congress, or any person with supervisory authority over the employee or who has the authority to investigate, discover, or terminate misconduct, where such information or investigation relates to any conduct of the employer that the employee reasonably believes constitutes a violation of specified federal fraud laws, any SEC rule or regulation, or any other federal law relating to fraud against shareholders; and filing, testifying, participating in, or otherwise assisting in a proceeding relating to alleged violations of any of the federal fraud or securities laws described in (1) above.

The prohibition against retaliation extends beyond actions by the publicly-traded corporate employer. The Act also specifically prohibits retaliation by any individual officer, employee, or agent, or any contractor or subcontractor of the employer.

9. For defense procurement fraud concerns, contact the DoD Ethics Hotline.

The Department of Defense has also established a hotline at 800-424-9098. Defense procurement fraud can be reported directly to the government via this hotline. While the company would appreciate the opportunity to address any issues before they are reported via this hotline, employees are free to use the DoD hotline.

Summary

Argon ST is dedicated to maintaining an honest, ethical and safe place to work. All reported concerns will be investigated promptly and appropriate action initiated as soon as possible. Reports will be kept confidential to the extent feasible, consistent with the need to conduct an adequate investigation. Retaliation against employees who raise

concerns will not be tolerated by the company, whether such retaliation is by any officer, employee, or agent of the company or by any contractor or subcontractor of the company.