



You're the Center of All We Do

Our Code of Conduct

Our Businesses have a reputation for conducting its business on a highly ethical level. It is important that we continue this record of integrity in the future.

Each and every employee of the Corporation and its subsidiaries is responsible for the maintenance of our fine reputation. We expect that each employee will support the Company's principles of business ethics and behave in a manner consistent with these high standards. We also expect that no employee in a supervisory position will instruct a subordinate to violate the ethical guidelines of the Corporation.

No list of rules can substitute for the exercise by anyone who represents our Company of basic morality, common decency, high ethical standards and respect for the law. If an employee is in doubt about the acceptability of a particular course of action the following test should be applied:

Assuming full public disclosure of the action, would both the employee and the Company feel comfortable from a moral, ethical and legal standpoint? If the answer is "Yes", then the action is very probably consistent with our Corporate philosophy.

If you are ever in doubt as to the appropriate legal or ethical behavior in a situation, you should seek the advice of your supervisor, and, if you are not able to come to satisfactory answer in those conversations, you should feel free to contact the President of the Company.

A number of states and other jurisdictions have adopted so-called "whistleblowing" laws. The company believes that communication and "whistleblowing" perform a valuable function in maintaining high ethical standards of conduct and reducing the risks to the Company, its employees and stockholders from conduct that does not meet the Company's high standards. Accordingly, in the unlikely event that you become aware of circumstances that appear inconsistent with our Employee Guidelines or you are instructed by a supervisor or manager to act in a manner inconsistent with our Employee Guidelines, you should review the matter with your supervisor and, if the matter is not resolved as a result of those discussions, you should contact the President of the Company to explain the details. If the facts reveal that such a violation may have occurred, the Company will investigate the situation and take appropriate action. The Company is committed to protecting responsible employees who report violations of the Employee Guidelines to management from reprisals or retribution. On the other hand, an employee who participates in or conceals a violation of the Employee Guidelines may be subject to disciplinary action, including the possibility of termination of employment.

The guidelines set forth below cover some, but by no means all, of the situations that might arise. These guidelines apply to all of our employees. Periodically, the Company may elaborate upon particular issues in separate policy statements and may adopt additional or amended guidelines.

- We are committed first and foremost to providing safe working conditions for our employees, to promoting the safe design, use and handling of our products and to complying with the laws relating to the protection of the environment. Each employee is expected to promote these goals in carrying out his or her tasks.
- The company is an Equal Opportunity Employer.

- Everything an employee does on the job is ultimately related to satisfying a customer need within the framework of our Code of Conduct. Our advancement and job security, both as a Company and as individuals depend on our ability to properly satisfy the needs of our customers.
- We expect each employee to practice and promote high professional standards in carrying out his or her tasks and in his or her relationships with other employees, suppliers, customers, stockholders and other persons having dealings with the Company.
- Consistent with these standards, employees are expected to treat each other with dignity and respect. The responsibility to treat fellow employees with dignity and respect is particularly strong in the case of those employees whose position in the Company may enable them to influence the job security, compensation, promotion or careers of other employees. This responsibility includes, among other things, the responsibility to avoid conduct demeaning to a person's race, religion, creed or national origin.
- We place a premium on honesty and fair dealing in relationships with and among our employees and in conducting our business activities. Employees are expected to be truthful in dealing with others. All written reports or responses to questions provided within the organization or to outsiders (customers, suppliers, financial institutions, governmental agencies of all kinds, other organizations and/or people with a need or right to receive information) are expected to be truthful, accurate and not misleading in anyway.
- Our products and services will be sold on their merits. We will compete vigorously and fairly in the markets we serve. We will afford our competitors the degree of respect that we expect them to afford us.
- Employees will not use improper or illegal methods to obtain information regarding our competitors.
- It is our policy to comply with the laws that affect the conduct of our business. It is the responsibility of each employee to have familiarity with the principles of law that affect the performance of his or her job, to assist the Company in complying with the law and to seek the advice of the employee's supervisor if the employee is uncertain of relevant legal principles.
- In the course of performing their duties, employees may have access to confidential information concerning other employees, such as information appearing on job applications, salary information or other confidential information concerning that employee. This information will be treated as confidential, used only for proper purposes, and divulged only to those having a "need to know."
- We will not ask or encourage employees to divulge confidential information to which they may have had access as a result of associations with other companies.
- The Company's tools, equipment, facilities and inventories, as well as its know-how, technology, market information and business plans are all valuable assets. It is the responsibility of every employee to preserve and protect the Company's assets and confidential business information and to see that they are not misused or made available to outsiders in any fashion that could be detrimental to the interests of the Company.

- No employee will place himself or herself in a position where his or her loyalty to the Company becomes divided due to a financial interest in a competitor, supplier or customer.
- The corporation forbids its employees to make illegal bribes or kickbacks intended to secure favored treatment for the Company.
- This rule applies to the use of intermediaries to make such payments. An employee who finds himself or herself in a situation calling for payments which might be construed as bribes or kickbacks should consult with his or her supervisor prior to taking action.
- The acceptance of gifts from suppliers, customers, or others having business dealings with the Company may involve a conflict of interest or create an appearance of impropriety. Accordingly, employees shall not accept any cash payments from persons having a business relationship with the Company. Employees may accept reasonable non-cash gifts having a token or nominal value from any company or individual which has, or might have, a business relationship with the Company provided that they are not intended and cannot be construed as a bribe, kickback or form of compensation to the recipient. Employees may entertain and be entertained in a manner that is customary and necessary for conducting business.
- The Company makes no political contributions anywhere. However, the Company encourages its employees to exercise their individual rights to be active in local or national politics.

We trust that we can count on all of our employees to maintain the excellent reputation of our company.

Thank you for your support.